

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1002/2013

Muhammad Shuaib,  
Theology Theacher, Govt. High School,  
Qutabgarh Takht Bhai Mardan.....Appellant.

Govt. Province  
Service No. 1003  
Date 05-6-13

Versus

1. The Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Civil Secretariat Peshawar.
2. PThe Director, Elementary & Secondary Education Dabgari Garden Peshawar.
3. The District Education Officer, Elementary & Secondary Education, (Male) Mardan.....Respondents

SCANNED  
KPST  
Peshawar

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 21.02.2013 WHEREBY 64 TTS (MALE) WERE PROMOTED TO THE POSTS OF STTS WHILE APPELLANT AT SERIAL NO.64 WAS UNLAWFULLY IGNORED AGAINST WHICH APPELLANT FILED DEPARTMENTAL REPRESENTATION ON 04.03.2013 BUT THE SAME WAS NOT DISPOSED OFF WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:

On acceptance of the instant appeal, the impugned Notification dated 21.02.2013 may graciously be

8/6/13

submitted to  
filed.  
21/6/13

Appeal No. 1002/2013

13.08.2018

Appellant Muhammad Shoaib in person alongwith his counsel Mr. Khalid Rehman, Advocate present. Mr. Hameed ur Rehman, AD(Lit) alongwith Mr. Zia Ullah learned DDA for respondents present.

The main contention of the appellant is that while issuing the impugned notification by the respondents on 21.03.2013, 67 posts as per quota, were required to be promoted but instead, 64 were promoted and at that time, the appellant was standing at Sr. no.144 whereas the last promotee was at Sr. no.142 and in case, all the 67 posts would have been filled vis promoted, then the appellant would have also been promoted but he was not considered at that time. Later on, he was promoted on 01.08.2017 but with immediate effect. So his grievance is that he has been kept deprived of the benefits available to him at the time of issuance of the impugned notification. At this stage, learned Deputy District Attorney raised preliminary objection on the jurisdiction of this Tribunal by citing the judgment of august Supreme Court of Pakistan reported in 2017 SCMR 890 and then the same followed by this Tribunal in service appeal no. 984/15 titled Badshah Islam- vs Chief Secretary Khyber Pakhtunkhwa decided on 11.10.2017. However, learned counsel for the appellant was not agreed with the objection raised by the DDA and still stressed to decide the case on merit.

The upshot of the foregoing limited discussion is that, this Tribunal is agree with the objection raised by the learned DDA, as such, placing reliance on the verdict of the august Supreme Court of Pakistan, this Tribunal lacks the jurisdiction to entertain the appeal in hand, thus disposed off accordingly, However, the appellant will be at liberty to approach the proper forum for redressal of his grievances. In the circumstances, parties are left to bear their own costs. File be consigned to the record room.

Announced:

13.08.2018

Appeal No. 1002/2013

13.08.2018

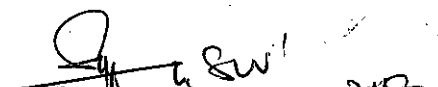
Appellant Muhammad Shoaib in person alongwith his counsel Mr. Khalid Rehman, Advocate present. Mr. Hameed ur Rehman, AD(Lit) alongwith Mr. Zia Ullah learned DDA for respondents present.

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Announced:  
13.08.2018


  
Member

  
Chairman 13-8-2018

27.07.2018

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant requested for short adjournment. Request accepted. To come up for arguments on 07.08.2018 before D.B. Admittedly the appellant has been promoted to the post of STT during the pendency of present appeal.


(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

07.08.2018

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney alongwith Mr. Hameed Ur Rehaman and Mr. Sajid ADOs for the respondents present. Learned Deputy District Attorney seeks adjournment to assist this Hon'ble Tribunal that as to whether the appellant seeks promotion or up-gradation as STT. Representative Mr. Sajid also submitted Notification dated 22.08.2017 regarding promotion of the appellant as STT. To come up for further proceedings/arguments on ~~13.08~~ 2018 before D.B .

  
(Muhammad Hamid Mughal)  
Member

  
(Muhammad Amin Kundi)  
Member

**13.02.2018**

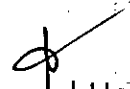
Clerk of the counsel for appellant present. Mr. Riaz Painsdakhel, Assistant AG for the respondent present. Counsel for the appellant is not in attendance due to general strike of the bar. To come up for arguments on 11.04.2018 before D.B.


  
Member

  
Chairman

**11.04.2018**

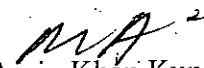
Clerk to counsel for the appellant and Mr. Muhammad Jan, Learned Deputy District Attorney present. Adjournment requested. adjourn. To come up for arguments on 25.05.2018 before D.B

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member


**25.05.2018**


Clerk of the counsel for appellant and Addl: AG for the respondents present. Arguments could not be heard due to incomplete bench. Adjourned. To come up for arguments on 27.07.2018 before D.B.

  
(M. Amin Khan Kundi)  
Member

20.06.2017

Agent to counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Agent to counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 23.10.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Gul Zeb Khan)  
Member

23.10.2017


Counsel for the appellant and Mr. Muhammad Jan Deputy District Attorney alongwith Hamid-ur-Rehman, AD (litigation) for the respondents present. Learned counsel for the appellant seeks adjournment. Granted. To come up for arguments on 07.12.2017 before D.B.

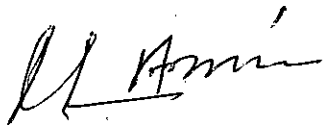
  
Member

  
Chairman

07.12.2017

Clerk of the counsel for appellant present. Mr. Riaz Ahmed Payanda Khel, Assistant AG alongwith Mr. Sajid Khan, Litigation Officer for the respondents also present. Representative of the department submitted record. Clerk of the counsel for appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 13.02.2018 before D.B.

  
(Ahmad Hassan)  
Member (E)

  
(Muhammad Amin Khan Kundi)  
Member (J)

9.6.2016

Agent to counsel for the appellant and Mr. Usman Ghani, Sr. GP for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 26.9.2016.

  
Member

  
Member

26.09.2016

None present for the appellant. Mr. Munamnad Jan, GP for the respondents present. Notice be issued to appellant and his counsel. To come up for final hearing before the D.B on 30.1.2017.

  
Member

  
Chairman

30.01.2017

Counsel for the appellant and Mr. Javed Shan, Litigation Officer alongwith Mr. Ziaullah. GP for respondents present. Both the learned counsels are of the view that seniority list as well as minutes of the meeting of the DPC are essential for just adjudication of appeal. Respondents are directed to produce attested copies of the same on or before the date fixed. To come up for final hearing on 20.06.2017 before D.B

  
Member

  
Chairman

Appellant Deposited  
Security & Process Fee



10.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Theology Teacher (BPS-15). That his name was reflecting at serial No. 144 of the seniority list and was entitled to be considered for promotion to BPS-16 on the basis of 1/3<sup>rd</sup> quota allocated for promotion but he was not considered for promotion despite his entitlement and civil servants to the extent of serial No. 142 of the seniority list were considered for promotion vide impugned order dated 21.2.2013 regarding which appellant preferred department appeal on 4.3.2013 followed by service appeal on 5.6.2013.

That the appellant is entitled to be considered for promotion with effect from the date his other colleagues were promoted. Places reliance on 2002 SCMR page 1056.

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 29.10.2015 before S.B.

  
Chairman

29.10.2015

Agent of counsel for the appellant, M/S Khurshid Khan, SO and Muhammad Haroon, Litigation Officer alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 24.2.2016 before S B.

  
Chairman

24.02.2016

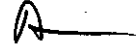
Agent of counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rahman, AD (lit.) and Javed Shah, Legal Advisor alongwith Addl: A.G for respondents present. Written reply by respondents No. 2 and 3 submitted. The learned Addl: AG relies on the same on behalf of respondent No. 1. The appeal is assigned to D.B for rejoinder and final hearing for 9.6.2016.

  
Member



22.04.2015

Agent of counsel for the appellant and Asstt: AG for the respondents present. Agent of counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 01.06.2015 before S.B.



Member

01.06.2015

Counsel for the appellant and Asstt: AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned to 07.07.2015<sup>R.P.H</sup> before S.B.



Member

07.07.2015

Clerk of counsel for the appellant and Asstt: AG for the respondents present. Clerk of counsel for the appellant requested for adjournment. To come up for preliminary hearing on 10.08.2015.



Member

12.

21.01.2015

Counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. The learned AAG requested for time to contact the respondents for submission of seniority list of the appellant. To come up for preliminary hearing on 06.02.2015.

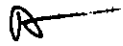


Member

13.

06.02.2015

Counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 06.03.2015.



Member

14.

06.03.2015


Counsel for the appellant and Mr. Naeem Akhtar, Legal Advisor with Asst: AG for the respondents present. Counsel for the appellant requested for adjournment. To come up for preliminary hearing on 22.04.2015.



Member

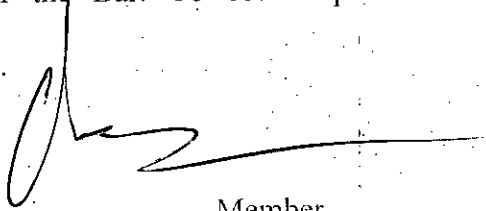
9.  
18.06.2014

Clerk of counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Clerk of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 21.08.2014.

  
Member


10.  
21.08.2014

Clerk of counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Preliminary arguments could not be heard due to General Strike of the Bar. To come up for preliminary hearing on 28.10.2014.

  
Member

11.  
28.10.2014

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Asst: AG for the respondents present. Clerk of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 21.01.2015.

  
Member

6.

25.02.2014


Clerk to counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 31.03.2014.

Member 

7.

31.03.2014

Counsel for the appellant present. Preliminary arguments partly heard. Pre-admission notice be issued to the learned GP to assist the Tribunal. To come up for preliminary hearing on 07.05.2014.

Member 

8.


07.05.2014

Clerk of counsel for the appellant present and requested for adjournment as his counsel was busy in the Peshawar High Court, Peshawar. Request accepted. To come up for preliminary hearing on 18.06.2014.

Member 


3.  
16.09.2013

Appellant with counsel present and requested for adjournment. To come up for preliminary hearing on 17.09.2013.

  
Member


4.  
17.09.2013

No one is present on behalf of the appellant. Case is adjourned. To come up for preliminary hearing on 08.10.2013.

  
Member


5.  
08.10.2013

Clerk of counsel for the appellant present and submitted and application for adjournment. To come up for preliminary hearing on 22.11.2013.

  
Member

6.  
22.11.2013

Clerk of counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 06.01.2014.

  
Member

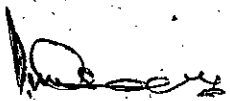
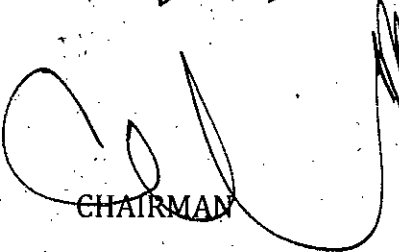
5.  
06.01.2014

Counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on the point of maintainability on 25.02.2014.

  
Member

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_  
Case No. 1002/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21/06/2013	<p>The appeal of Mr. Muhammad Shuaib resubmitted today by Mr. Khaled Rehman 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	16-7-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>16-9-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Shuaib T.T GHS Qutabharh Distt. Mardan received today i.e. on 05/06/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days:-

- 1- Annexure-A of the appeal is illegible which may be replaced by legible one.
- 2- Annexures of the appeal may be attested.
- 3- Appeal may be got signed by the appellant.

NO. 457 /S.T.,

Dt. 5/6 /2013.

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR,

KHALED REHMAN ADV. PESH.

*In*  
*resubmitted after*

*Completion*

*21/6/13*

Copy

GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

*Peshawar, dated November 13, 2012*

E)4-5/SSRC/Meeting/2012/Teaching Cadre: In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, and Transfer) Rules, 1989 and in supersession of all the Notifications issued in this behalf the Elementary and Secondary Education Department in consultation with the Government 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 Appendix attached therewith.

Sd/-

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Date as above.

ded to:

The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department.  
The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.  
The Secretary to Govt. of Khyber Pakhtunkhwa Law Department.  
The Secretary Khyber Pakhtunkhwa Public Service Commission, Peshawar.  
The Accountant General, Khyber Pakhtunkhwa Peshawar.  
The Director (E&SE) Khyber Pakhtunkhwa Peshawar.  
The Director Education (FATA), Peshawar.

ATTESTED



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GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

*Peshawar, dated November 13, 2012*

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Sd/-

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Endst: 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.

ATTACHED

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8. 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 (E&S) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officer 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.

Sd/-  
Section Officer (Primary)

**ATTESTED**

**ANNA**

*[Handwritten signature]*

APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
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:

WANTED

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					(iv) one per cent from amongst the _____ Material Specialists with at least five years service as such and having qualification mentioned in column No.3: and (v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in column No.3; and  (b) fifty per cent by initial recruitment.
2	Senior Arabic Teacher (SAT) (BPS-16)				By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
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.
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).

ATTESTED

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5.	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 Teachers (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.

**ATTESTED**

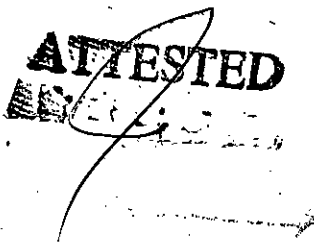
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10.	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom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

**ATTESTED**

**Better Copy**

		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		(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).  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 years service and having qualification prescribed for initial recruitment of Certified Teacher (General).  Note: In case of non availability of suitable person for promotion, then by initial recruitment.
14.	Certified Teacher (Industrial Arts) (BPS-15)	(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  (ii) 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 and having qualification prescribed for initial recruitment of Certified Teacher

**ATTESTED**  


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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 Teacher (Industrial Arts).  Note: In case of non availability of suitable person for promotion, then by initial recruitment.
15.	Certified Teacher (Agriculture) (BPS-15)	(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	(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 Teacher (Agriculture):  Provided that if no suitable candidate is available amongst the

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		University <u>with nine months training from</u> any Government Agro. Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		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 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 <u>with nine months training from</u> 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 of

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		University with one year vocational training from any Government training centre 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). Note: In case of non availability of suitable person for promotion, then by initial recruitment.
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 Years	(a) Eighty per cent by initial recruitment; and (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.  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.  Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.

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18.	Physical Education Teacher (BPS-15)	Bachelor's Degree from a recognized University with one year Junior Diploma in Physical Education course or any equivalency or other equivalent qualification.	18 to 35 Years	(a) Eighty per cent by initial recruitment; and (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 Physical Education Teacher.  Provided that if no suitable candidate is available for promotion, then 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 Physical Education Teacher.  Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.
19.	Primary School Head Teacher (PSHT) (BPS-15)		-	By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14)		-	By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

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				with at least five years service as such and having qualification prescribed for initial 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 Council level: provided that if no suitable candidate within the Union Council is available, then from 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 under:*

Arabic Teacher

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

Theology Teacher

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

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**Qari/Qaria**

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

***Certified Teacher***

***(General, Industrial Arts, Agriculture, Home Economics)***

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

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**Drawing Master**

<i>Category of Qualification</i>	<i>Total Marks 100</i>	<i>For Candidate of Science group</i>
SSC	Marks obtained X 20/total marks =	5 Extra marks for FSc, 5 Extra marks for BSc and 5 Extra marks for MSc 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/M.Sc/M.Ed/MA Edu	Marks obtained X 15/total marks =	
MPhil/PhD	Marks = 05	

**Physical Education Teacher**

<i>Category of Qualification</i>	<i>Total Marks 100</i>	<i>For Candidate of Science group</i>
SSC	Marks obtained X 20/total marks =	5 Extra marks for FSc, 5 Extra marks for BSc and 5 Extra marks for MSc 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/M.Sc/M.Ed/MA Edu	Marks obtained X 15/total marks =	
MPhil/PhD	Marks = 05	

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**Primary School Teacher**

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


**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. Deni Asnad from recognized Tanzeemat-ul-Wafaqul Madaris, 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 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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18.	Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; ar</p> <p>(b) twenty per cent by promotion, on th 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 th 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><u>Note:</u> In case of non-availability of suitab candidate for promotion, then by inti recruitment.</p>				
19.	Primary School Head Teacher (PSHT) (BPS-15).			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 inti recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum fitness, from amongst Primary School Teache

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				with at least five years service as such having qualification prescribed for initial 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 Council level; provided that if no suitable candidate within the Union Council is available, then from 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.

ACCEPTED

Annex A

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

*Peshawar, dated the November 13, 2012*

No. SD/14/4-SS/SRC/Me/109/2012/Teaching Cadre: In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Service (Recruitment, Promotion and Transfer) Rules, 1987 and in pursuance of the 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 and the various other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the following table and the schedule therewith.

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

Order No. 8/2012/SS/14

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 to Govt. of Khyber Pakhtunkhwa, Public Service Commission Peshawar
5. The Accountant General, Khyber Pakhtunkhwa Peshawar
6. The Director (ESSE) Khyber Pakhtunkhwa Peshawar
7. The Director Education (FATA), Peshawar

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1. The Director Curriculum & Teachers Education Abbottabad
2. The Director (PITE) Khyber Pakhtunkhwa Peshawar
3. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. The Deputy Director Database(E&S) E&SE Department.
5. All District Coordination Officers in Khyber Pakhtunkhwa.
6. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
7. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
8. All Agency Education Officers FATA.
9. P.S to Governor, Khyber Pakhtunkhwa
10. P.S to Chief Minister, Khyber Pakhtunkhwa.
11. P.S to Chief Secretary, Khyber Pakhtunkhwa
12. P.S to Minister E&SE Khyber Pakhtunkhwa Peshawar.
13. P.S to Secretary E&S Department.
14. Master File

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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				<p>(iv) one per cent from amongst Instructional Material Specialists with at least five years service as 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>
2.	Senior Arabic Teacher (SAT) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
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.
4.	Senior Certified Teacher (SCT)(General) (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teacher (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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	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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✓ Arabic

<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.  Note: 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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		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		(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). Provided that if no suitable candidate is available amongst the Primary School Head Teachers to 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).
				<u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
14.	Certified Teacher (Industrial Arts) (BPS-15).	(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  (b) 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 and having qualification prescribed for initial recruitment of Certified Teacher

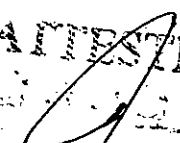
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		University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).		(Industrial Arts):  Provided that if no suitable candidate is available amongst 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).
				<u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
15.	Certified Teacher (Agriculture) (BPS-15).	(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.	(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):  Provided that if no suitable candidate is available amongst the

ATTENDED



		any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro-technical (Agriculture).		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 Teacher (Agriculture).
				<u>Note:</u> 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 of

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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 = ____
BA/BSc	Marks obtained X 20 / total marks = ____
MA Arabic / Shahadatul Atania Fil Uloomul Arabia wal Islamia from a recognized Tanzeemuatul 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 = ____
BA/BSc	Marks obtained X 20 / total marks = ____
MA/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = ____
MA Islamiat / Shahadatul Atania Fil Uloomul Arabia wal Islamia from a recognized Tanzeemuatul Wafaqul Madaris	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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Qual/Qualia

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks =
Qual Sentad 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

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 P.Sc. & Extra marks for B.Sc. and 5 Extra marks for M.Sc. will be added to the total score obtained by the 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	

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
BSC	Marks obtained x 25% Total marks	5
BNSC	Marks obtained x 20% Total marks	5
B.A.P.S.	Marks obtained x 20% Total marks	5
BM Certificate	Marks obtained x 20% Total marks	5
M.A.M.S. - M.Ed. - M.A. Ed.	Marks obtained x 15% Total marks	5
M.Phil. Ed.	Marks - 05	

Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
BSC	Marks obtained x 25% Total marks	5
BNSC	Marks obtained x 20% Total marks	5
B.A.P.S.	Marks obtained x 20% Total marks	5
B.P.P. or Equivalent Certificate	Marks obtained x 20% Total marks	5
M.A.M.S. - M.Ed. - M.A. Ed.	Marks obtained x 15% Total marks	5
M.Phil. Ed.	Marks - 05	

ATTENDED

[Signature]

20

16

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
TISSC	Marks obtained X 10 / total marks = ____	
BA/BSc	Marks obtained X 25 / total marks = ____	
PST Certificate/ Diploma in Education / ADE	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = ____	
MPhil/PhD	Marks = 05	

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 more than 30 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 false/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. Darul Ahsan from recognized Tameemat-ul-Wafaqul Madaris, Darul Uloom Saifu 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.

**ATTESTED**

## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Pll No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0809-33857  
E-mail rafiq\_kk851@yahoo.com

Annex "B"



### Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification Nos SO(R&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-300-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:

Total No. of TT (M) Posts duly verified by the DAO	202
1/3 share of Senior TT Posts	67
Share of promotion 100 %	67
Promoted to the post of Senior TT B-16.	64

Sr. No.	Sen No.	Name	Place of posting	Date of Birth	Remarks
1	1	Shamza Tabrez	GHS Sawal Dher	01/12/1958	Services placed at the disposal of DEO (M) Mardan for further posting.
2	10	Sharif Ullah	GMS Khan Pur	01/02/1954	Do
3	17	Ali Bahadar	GMS Subhat Abad	20/08/1957	Do
4	22	Muhammad Younas	GMS Chargo Chail	09/02/1961	Do
5	27	Irfanullah	GHS Baghdada	04/01/1966	Do
6	29	Aminur Rahman	GHS Takht Bhui GHS Mazdoorabad T. Bhui	20/09/1967	Do
7	30	Muhammad Burhan	GMS Bazar Rustam	15/03/1965	Do
8	36	Muhammad Ishfaq	GMS Janga	02/11/1968	Do
9	37	Muhammad Qasim	GMS Qasim Toru	01/10/1962	Do
10	40	Ahmad Saqib	GHS Shamsahd Abad Toru	25/12/1964	Do
11	41	Fateh Khan	GHS Jhangir Abad	03/10/1958	Do
12	43	Jehangir Khan	GMS Choragh Din Killi	01/01/1967	Do
13	46	Arzida Khan	GMS Baghdada	02/03/1965	Do
14	48	Muhammad Rafiq	GHS Bicket Cuni No 1	08/11/1970	Do
15	50	Masood Akhtar	GMS Kalpani	02/12/1961	Do
16	61	Hamid Ali	GMS Sarband	20/08/1968	Do
17	62	Shamsul Haq	GMS Shah Dand	15/03/1969	Do
18	63	Noor Wahid	GMS Banero Killi	13/06/1971	Do
19	65	Fozal Wahab	GMS Alalak Abad	01/02/1966	Do
20	66	Ijaz Ahmad	GHS Katha Gurhi	04/08/1962	Do
21	69	Shafiq ur Rehman	GHS Pie Sadai	04/01/1966	Do
22	71	Muhammad Ghafour	GHS Pie Sadai	03/10/1971	Do

**ATTESTED**



23	78	Muhammad Farooq	GHSS Mardan	02/12/1972	---Do---
24	80	Muhammad Naseem	GMS Bahadar Khan Koty	20/05/1972	---Do---
25	86	Syed Asif Uldin	GMS Surkh Dheri	01/02/1971	---Do---
26	87	Ghulam Ullah	GMS Tariq Abad	15/03/1976	---Do---
27	89	Hussain Ahmad	GCMS No.3	20/01/1975	---Do---
28	90	Zahoorul Haq	GHS Mohib Banda	11/01/1968	---Do---
29	91	M. Zakirul Haq	GHSS Chamtar	01/01/1972	---Do---
30	92	M. Ashraf Ali Shah	GHS Nodeh Toru	09/06/1971	---Do---
31	94	Abdul Qayyum	GHSS Mardan	30/12/1969	---Do---
32	98	Muhammad Ayaz	GMS But Seri	08/12/1973	---Do---
33	99	Muhammad Tayyab	GHS Kandar	24/05/1976	---Do---
34	101	Aziz ur Rehman	GMS Guli Bagh sld	17/01/1970	---Do---
35	102	Abdul Ghafar	GMS Spelano Dheri L.K	24/04/1970	---Do---
36	104	Diyar Khan	GHS Pati Kalan	02/09/1975	---Do---
37	105	Zia ur Rehman	GMS Surkhabi	02/06/1970	---Do---
38	106	Imran Ullah	GHS Gujrat	04/07/1975	---Do---
39	108	Rizwanul Haq	GHS Kot Takht Bhai	03/03/1975	---Do---
40	109	Molvi Muhammad Haq	GMS Sofaraz Killi	01/10/1979	---Do---
41	110	Muhammad Ayaz	GMS Shamaoon Killi	25/08/1972	---Do---
42	111	Muhammad Qureshi	GHS Sangao	30/09/1969	---Do---
43	112	Hafiz Behram Ahmad	GHSS No.1 Mardan	17/08/1971	---Do---
44	116	Lutfut Ullah	GMS Musafar Khan Killi	08/06/1969	---Do---
45	120	Syed Akbar Sabir	GHSS Takht Bhai	02/10/1977	---Do---
46	123	Muhammad Hassan	GMS Ganjai T.Bhai	20/03/1970	---Do---
47	124	Muhammad Arshad	GHSS Takht Bhai	04/01/1971	---Do---
48	125	S. Muhammad Arif	GHS Bala Garhi	13/05/1971	---Do---
49	126	Mufti Amjad Ali	GHS Khgdi Killi	15/04/1972	---Do---
50	127	Hanifullah	GHSS Hathian	02/02/1973	---Do---
51	128	Muhammad Hussain	GHSS Takkar	02/02/1973	---Do---
52	129	S. Aziz Ahmad Shah	GHS Gujrat	03/05/1974	---Do---
53	130	Said Riaz Ahmad	GMS Nawan Killi Rustam	15/05/1974	---Do---
54	132	Qazi Muhammad Ibrur	GMS Hoti Mardan	31/01/1975	---Do---
55	133	Syed Murtaza	GMS Cheena	07/03/1975	---Do---
56	134	Fazli Rahim	GMS Khazana Dheri	01/05/1976	---Do---
57	135	Muhammad Jehan Zeb Khan	GMS Sadiq Abad	14/02/1976	---Do---
58	136	Gul Bad Shah	GMS Muhammad Din Killi	24/02/1976	---Do---
59	137	S.M. Yahya Jan	GHS Gujrat	15/04/1978	---Do---
60	138	Khalid Mahmood	GMS Kot Jungara	15/04/1978	---Do---
61	139	Shaukat Ali	GMS Mir Baz Ghaz	03/02/1979	---Do---
62	140	Shamsur Rehman	GHS Baringan	01/09/1967	---Do---
63	141	Ayub Khan	GHS Katlang	22/02/1968	---Do---
64	142	Roshul Amin	GHSS Hathian	13/05/1970	---Do---

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Handwritten signature and stamp at the bottom right.



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9225340- 9225341,  
9225338, 9225339

Fax 091-9225345

E-mail rafiq\_kk851@yahoo.com

### Notification

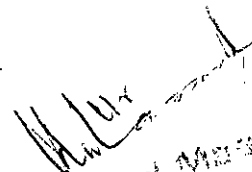
Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts, they will be posted by the District Education Officer concerned.

Total No. of sanctioned post of TTs	220
1/3 share of Senior TT Posts	72
Share of promotion 100 %	72
No of senior TT posts already filled by promotion	67
Posts available for promotion	08
Promoted to the post of Senior TT B-16 in this order	08

S. No.	S.L. No.	Name Of Official	Place Of Posting	Date Of Birth	Date Of Apptt;As Tt Regular	Remarks
1	143	Fazli Kareem	GHS Ghala	2/2/1971	24/02/2007	Services placed at the disposal of DEO (M) Mardan for further posting.
2	144	Muhammad Shoaib	GHS Qutab Garh	3/2/1971	24/02/2007	-----do-----
3	145	Abid Ur Rahman	GHSS Dheri Likpani	12/6/1972	24/02/2007	-----do-----
4	146	Gul Sher Khan	GHS Garhi Kapura	5/3/1973	24/02/2007	-----do-----
5	147	Riaz Ud Din	GMS Baido Killi	22/4/1973	24/02/2007	-----do-----
6	148	Sher Bahadar	GMS Mehter Ghundai	5/1/1974	24/02/2007	-----do-----
7	149	Aziz Ahmad	GMS Pipal	24/2/1975	24/02/2007	-----do-----
8	150	Fayaz Ali	GHSS Mohabat Abad	2/9/1975	24/02/2007	-----do-----

### **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 his performance is found unsatisfactory during probationary period. In case of misconduct, he 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.

  
 Head Master  
 CH School, Garh  
 Mardan

- 7 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 in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar. 68

Endst: No. 29-54 / File No. 1/Promotion Senior TT B-16: Dated Peshawar the 01/02/2017.

Copy forwarded for information and necessary action to the: -

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

*[Signature]*  
Dy. Director (Estab)

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

*[Signature]*



**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 <sup>rd</sup> ) 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 <sup>rd</sup> ) 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.
	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.
	Teacher of (Sr. TT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) 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.
		"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.
		"do"	Newly Upgraded/Redesignated Post	(BPS-16)	one thirds (1/3 <sup>rd</sup> ) 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

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 BPS-15 for the present incumbents to the post as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total PETs posts are upgraded to BPS-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 <sup>rd</sup> ) 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 16/07/2012

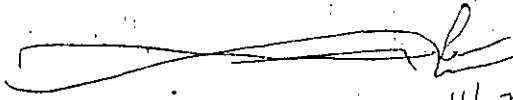
Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.  
All District Account Officers

  
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.

  
(NOOR ALAM KHAN WAZIR)  
SECTION OFFICER (B&A)  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

11/07/2012

23

TT's (M) Mardan 3

- 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 his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 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 in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

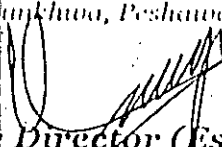
Director

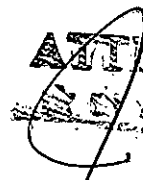
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Endst: No. <sup>41056-62</sup> / File No.1/Promotion Senior TT B-16: Dated Peshawar the 21/02/2013.

Copy forwarded for information and necessary action to the: -

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

  
21/2/2013  
Dy: Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

ATTESTED  


The Director,

Elementary and Secondary Education,

KPK, Peshawar. Through D.E.O. (M) Mardan.

Subject: Request for promotion to BPS-16 as T.T.

Sir,

It is stated respectfully that I have been teaching as T.T at GHS Qutabgarh District Mardan since 24<sup>th</sup> Feb, 2007. I submitted my file required to DEO Mardan which was completed in all respects and forwarded to the Director for promotion as per policy. The Director notified 64 teachers for promotion to BPS-16 vide Endst No: 4056-62 dated Peshawar the 21/02/2013. According to the 1/3 policy 67 T.Ts should be promoted to BPS-16 but only 64 were promoted and 03 were differed. The DEO issued list of 202 in which my serial No is 144 out of 145 who are recommended for promotion. According to 1/3 policy my number falls at No 66 out of 67.

But due to some unseen reason I was not promoted to BPS-16 although my file was complete in all respects.

Therefore, it is requested humbly that my name may please kindly be included in the seniority list of 67 T.Ts of District Mardan and obliged.

Yours truly,

Muhammad Shuaib, *MHS*

T.T GHS Qutabgarh, Mardan.

Mobile No: 0314-9625644.

(24) Date. 4-3-2013

Amex (C)

The application is self explanatory kindly look into the subject cited. The applicant really deserve B.P.S. 16 as per govt. policy.

*(M) Shuaib*  
HEAD-MASTER  
G.H.S. QUTABGARH  
MARDAN

ATTESTED

No 1082 dated 4/3/2013

25

From the office of the Headmaster:  
GHS Outab Garh Mardan  
cell # 0345 2951406

Annex "D"

To  
Distt. Education officer  
Mardan.

Subj: upgradation to B.16 of Muhammad Shoaib T.T.

memo,

Enclosed please find herewith original application  
of Mr. Muhammad Shoaib T.T of this school for  
upgradation to B.P.S. 16 as per govt. policy.  
It is further stated that this officer has sent his  
complete file vide Endst No. 1061 dated 14.12.2013  
for DPC. His upgradation is delayed due to  
certain reason.  
The same is forwarded for further m/a

101667  
4/13/13  
115/11  
4/13/13  
Executive District Officer  
Mardan

Strah  
HEAD MASTER  
G.H.S. OUTAB GARH  
MARDAN.

ATTACHED



No. \_\_\_\_\_ /PF Muhammad Shoaib 11 /Dated Mardan the 30/3/2013

26

From

The District Education Officer  
(Male) Mardan.

To

Amen 'E''

The Director,  
Elementary & Secondary Education,  
Khyberpakhtun Khwa Peshawar.

Subject: - PROMOTION TO BPS-16

Memo:

I have the honour to state the appeal of Mr Muhammad Shoaib TT received from the Headmaster GHS, Qutab Garh Mardan for promotion to BPS-16 as his case has already been discussed and cleared in the D.P.C meeting held on 31.12.2012 at GCMS, for boys Mardan but due to some unknown reason his case for promotion to B-16 not included in the promotion order. His case for the above cited subject is sent herewith for your kind perusal and necessary action please.  
Encl: As above.


3167-68

District Education officer  
(Male) Mardan.

Endst: No. \_\_\_\_\_

Copy for information to the:-

1. Headmaster, GHS, Qutab Garh Mardan w/r to his No.1082  
Dated 4.3.2013.
2. Gen. file.

  
District Education officer  
(Male) Mardan.

29/3/2013  
3167

**REGISTERED**

WAKALAT NAMA

IN THE COURT OF

Mr. K. Senui *Tr*

Abid Sheikh Appellant(s)/Petitioner(s)

VERSUS

Faet Respondent(s)

I/We \_\_\_\_\_ do hereby appoint **Mr. Khaled Rehman, Advocate** in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

**AND hereby agree:-**

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this \_\_\_\_\_

Attested & Accepted by

Khaled Rehman,  
Advocate, Peshawar.

9-B, Haroon Mansion  
Khyber Bazar, Peshawar

MBS  
Signature of Executants

[Signature]

OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN

8.

Final Seniority List of TT Teachers (Male) District Mardan

Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	PPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing /App/Transf. Date	Remarks
1	1	Shamsu Tabrez MA Is Aalia	Janahuddin	TT 15	12/01/1958	Mardan	30/11/1978	30/11/1978	GHS Sawal Dher	30/11/1978	
2	2	Wahid Gul Sanad	Yad Gul	TT 15	06/07/1953	Mardan	15/12/1976	15/12/1976	GHS Toru	28/05/1979	IDT
3	3	Najeeb Ahmad Middle Aalmia	Abdul Khalig	TT 15	03/09/1952	Mardan	01/09/1976	24/10/1979	GHS Pirabad	24/10/1979	Retired 02/09/2012
4	4	Mian Khan uddin SSC Sanad Faragh	Sarafuddin	TT 15	04/09/1954	Mardan	01/12/1979	01/12/1979	GHSS Baghdadada	01/12/1979	
5	5	Mian Said FA Sanad Faragh	Said Rahman	TT 15	02/10/1954	Mardan	01/12/1979	01/12/1979	GMS Babeni	01/12/1979	IDT
6	6	Fazal Akram SSC Sanad	Muhammad Ali Jan	TT 15	01/04/1960	Mardan	02/03/1980	02/03/1980	GMS Kotki	02/03/1980	
7	7	Ihsan ullah Aafia	Muhammad Zaman	TT 15	10/05/1954	Mardan	05/05/1980	05/05/1980	GMS Lund Khwar	05/05/1980	
8	8	Rahmat Wali SSC Sanad	Abdul Wali	TT 15	01/01/1963	Mardan	13/10/1981	13/10/1981	GHS Garhi Kapura	13/10/1981	
9	9	Syed Zakirullah Jan SSC Aalmia	Syed Rehan Shah	TT 15	10/11/1952	Mardan	15/11/1982	15/11/1982	GHS Shamoza	15/11/1982	Retired 09/11/2012
10	10	Sharif Ullah MA Aalmia	Munasib Khan	TT 15	02/01/1954	Mardan	01/01/1984	01/01/1984	GMS Khan Pur	01/01/1984	
11	11	Saif ur Rehman SSC Aalmia	Said Rahman	TT 15	02/01/1951	Mardan	05/02/1984	05/02/1984	GHS Katlang	05/02/1984	
12	12	Rahmat Ullah Khan SSC Sanad	Rahmat i Haq	TT 15	22/06/1957	Mardan	27/10/1984	27/10/1984	GMS Landaki Hoti	27/10/1984	
13	13	Abdul Ghufuran BA Sanad	Mahboob ur Rahman	TT 15	10/02/1958	Mardan	28/10/1984	28/10/1984	GHS Khairabad	28/10/1984	
14	14	Shafiq ur Rahman Middle Sanad	Fazlur Rahman	TT 15	05/05/1962	Mardan	06/11/1984	06/11/1984	GMS Kopar Banda	06/11/1984	
15	15	Aziz ur Rehman UM Sanad	Fazli Rehman	TT 15	12/03/1963	Mardan	06/11/1984	06/11/1984	GMS Said Abad	06/11/1984	
16	16	Mukhtair Ahmad D.Nizami	Faiz Gul	TT 15	02/04/1960	Mardan	02/09/1985	02/09/1985	GHS Sowaryan Toru	02/09/1985	
17	17	Ali Bahadar MA Isl Sanad Faragh	Mirdad	TT 15	20/08/1957	Mardan	09/10/1985	09/10/1985	GMS Suhbat Abad	09/10/1985	
18	18	Abdul Munir SSC Sanad	Abdul Jalal	TT 15	11/03/1955	Mardan	15/12/1985	15/12/1985	GHS Babu Zai Katlang	15/12/1985	
19	19	Fazli Mabood Sanad	Qalandar Shah	TT 15	01/09/1960	Mardan	01/02/1986	01/02/1986	GMS Mashal Khan Killi	01/02/1986	
20	20	Abdur Razliq Aafia	Molvi Abdul Qudus	TT 15	16/02/1931	Mardan	11/02/1986	11/02/1986	GHS Rustam	11/02/1986	
21	21	Qanbur Rahman Sanad	Pulail	TT 15	03/03/1957	Mardan	02/09/1986	21/09/1986	GHS Garhi Daulatzi	21/09/1986	
22	22	Muhammad Younas MA Isl Sanad	Muhammad Rauf	TT 15	02/09/1961	Mardan	27/09/1986	27/09/1986	GMS GLARGO CHAIL	27/09/1986	
23	23	Naeemullah Shah Sanad	Munib Shah	TT 15	15/11/1962	Mardan	15/11/1986	15/11/1986	GCMHS Boys	15/11/1986	
24	24	Muhammad Jafar UM Sanad	Muhammad Kind	TT 15	16/11/1958	Mardan	17/11/1986	17/11/1986	GHS Ghala	17/11/1986	
25	25	Amin ul Haq Sanad	Abdul Haq	TT 15	09/06/1958	Mardan	10/12/1986	10/12/1986	GMS Anar Baiq	10/12/1986	
26	26	Habib Muhammad BA Aalmia	Fateh Muhammad	TT 15	01/01/1966	Mardan	15/11/1987	15/11/1987	GMS Farsh Chichar	15/11/1987	
27	27	Irfanullah MA Aalmia, B.Ed	Abdur Rahim	TT 15	01/04/1956	Mardan	16/11/1987	16/11/1987	GHSS Baghdadada	16/11/1987	
28	28	Abdul Khalig FA Aalmia	Abdur Razliq	TT 15	15/02/1967	Mardan	16/11/1987	16/11/1987	GMS Lund Khwar	16/11/1987	
29	29	Aminur Rahman SSC Aafia	Badshah Gul	TT 15	20/09/1957	Mardan	24/10/1988	24/10/1988	GHSS Takht Bhal	24/10/1988	

OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN

Final Seniority List of TT Teachers (Male) District Mardan

S. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	BPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing /App/Transf er Date	Remarks
30	30	Muhammad Burhan MA Isl Aalmia	Gul Muhammad	TT 15	15/03/1965	Mardan	31/10/1988	31/10/1988	GHS Mazdoorabad T.Bha	31/10/1988	
31	31	Abdur Rehman SSC Sanad	Syed Abdul Wadood	TT 15	04/05/1962	Mardan	01/11/1988	01/11/1988	GMS Cham Dheri	01/11/1988	
32	32	Muhammad Tariq SSC	Abdul Ghani	TT 15	18/03/1960	Mardan	01/12/1988	01/12/1988	GHS Mohabat Abad	01/12/1988	
33	33	Ihsan ullah FA Sanad	Ghulam Rabbani	TT 15	10/04/1968	Mardan	28/10/1989	28/10/1989	GHS Gaddar	28/10/1989	
34	34	Muhammad Yousaf FA Aalmia	Musa Jan	TT 15	01/06/1961	Mardan	30/10/1989	30/10/1989	GHS Fatima	30/10/1989	
35	35	Rahmat Jan SSC Sanad Faragh	Alam Jan	TT 15	07/06/1965	Mardan	07/11/1989	07/11/1989	GHS Hoti Landaki	07/11/1989	
36	36	Muhammad Ishfaq SSC Aalmia	Aziz ur Rehman	TT 15	11/02/1968	Mardan	21/11/1985	01/02/1990	GMS Bazar Rustam	01/02/1990	IDT
37	37	Muhammad Oasim SSC Aalmia	Ghulam Muhammad	TT 15	10/01/1962	Mardan	10/03/1990	10/03/1990	GMS Janga	10/03/1990	
38	38	Muhammad Pervez D.Com Sanad	Abdul Hakim	TT 15	19/07/1965	Mardan	04/03/1987	15/04/1990	GMS Chamrang	15/04/1990	
39	39	Sadiq Ahmad FA Sanad	Adul Hameed	TT 15	30/03/1966	Mardan	30/04/1990	30/04/1990	GHS Faram Koroona	30/04/1990	
40	40	Ahmad Saeed MA Isl Aalia	Muhammad Saeed	TT 15	25/12/1964	Mardan	16/11/1987	12/03/1991	GHS Oasim Toru	12/03/1991	
41	41	Fateh Khan MA Isl Aalmia	Alam Khan	TT 15	10/03/1958	Mardan	03/05/1988	07/09/1991	GHS Shamshad Abad Tor	07/09/1991	
42	42	Sanber Khan Sanad	Amir Shah	TT 15	02/09/1958	Charsadda	31/05/1985	26/01/1992	GMS Dako Baba	26/01/1992	IDT
43	43	Jehangir Khan FA Aalia	Usman Uddin	TT 15	01/01/1967	Mardan	01/03/1992	01/03/1992	GHS Jehangir Abad	01/03/1992	
44	44	Fazli Kanim FA Sanad	Muhammad Akram	TT 15	15/03/1965	Mardan	08/12/1966	28/03/1992	GMS Mala Dheri	28/03/1992	
45	45	Muhammad Sadiq BA Sanad Faragh	Gul Rahim	TT 15	01/03/1965	Mardan	01/04/1992	01/04/1992	GHS Khairabad	01/04/1992	
46	46	Arsala Khan MA Aalmia	Gul Mula Khan	TT 15	03/03/1965	Mardan	01/04/1992	01/04/1992	GMS Charagh Din Kili	01/04/1992	
47	47	Abdus Samad Sanad Faragh	Shafful Haq	TT 15	01/07/1967	Mardan	01/04/1992	01/04/1992	GMS Badam	01/04/1992	
48	48	Muhammad Rafiq FA D. Nizami	Mewa Din	TT 15	11/08/1972	Mardan	02/04/1992	02/04/1992	GMS Baghdada	02/04/1992	
49	49	Muhammad Sayyar MA Khassa, CT	Shamsher Ali	TT 15	08/03/1970	Mardan	12/04/1992	12/04/1992	GHS Jamal Garhi	12/04/1992	
50	50	Masood Akhtar MA Isl Sanad Faragh	Roghan Shah	TT 15	12/02/1971	Mardan	30/04/1992	30/04/1992	GHS Bicket Gunj No.1	30/04/1992	
51	51	Sadi Khan BA Aalia	Ambali Khan	TT 15	01/01/1957	Mardan	01/05/1992	01/05/1992	GHS Badar Banda	01/05/1992	
52	52	Aziz ur Rehman SSC Sanad	Abdul Sadiq	TT 15	15/12/1954	Mardan	10/06/1992	10/06/1992	GHS Lund Khwar	10/06/1992	
53	53	Ihtishamul Haq SSC Sanad	Zahoorul Haq	TT 15	20/09/1972	Mardan	09/09/1992	09/09/1992	GMS Purana Hoti	09/09/1992	
54	54	Molvi Muhammad Sadiq D. Nizami	Sheerin Muhammad	TT 15	10/04/1965	Mardan	18/05/1987	30/09/1992	GMS Kunj	30/09/1992	IDT
55	55	Shahid Ali Afsar FA Aalmia	Afsar Khan	TT 15	11/04/1973	Mardan	29/10/1992	29/10/1992	GMS Par Hoti	29/10/1992	
56	56	Asghar Ali FA Sanad	Bacha Gul	TT 15	15/03/1968	Mardan	01/11/1992	01/11/1992	GMS Mian Esa	01/11/1992	
57	57	Sahib Noor BA D. Nizami	Muhammad Noor	TT 15	09/08/1966	Mardan	05/11/1992	05/11/1992	GMS Char Gull	05/11/1992	
58	58	Imran Ali SSC D. Nizami	Taj Muhammad	TT 15	04/01/1965	Mardan	06/11/1992	06/11/1992	GHS Kata Khat	06/11/1992	

**OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN**

**Final Seniority List of TT Teachers (Male) District Mardan**

Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	BPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing / App/ Transfer Date	Remarks
58	59	Ali Rehman	Sanad Aalmia	Ghazi Khan	TT 15	04/02/1968	Mardan	16/11/1992	16/11/1992	GHS Seri Behlol	16/11/1992
60	60	Nageeb Ahmad	SSC D. Nizami	Abdul Shakoor	TT 15	10/04/1968	Mardan	04/05/1993	04/05/1993	GMS Garoo	04/05/1993
61	61	Hamid Aji	MA Isl Sanad D. Nizami	Abdur Raziq	TT 15	20/08/1968	Mardan	04/05/1993	04/05/1993	GMS Kalpani	04/05/1993
62	62	Shamsul Haq	MA Isl Sanad Faragh	Abduli Haq	TT 15	15/03/1969	Mardan	09/05/1993	09/05/1993	GMS Sarband	09/05/1993
63	63	Noor Wahid	SSC Aalia	Gul Ahmad Jee	TT 15	15/05/1971	Mardan	09/05/1993	09/05/1993	GMS Shah Dand	09/05/1993
64	64	Syed Faiz hullah	SSC D. Nizami	Syed Hidayatullah	TT 15	06/03/1971	Mardan	10/05/1993	10/05/1993	GHS Tordher	10/05/1993
65	65	Fazal Wahab	SSC Aalmia	Toor Lali	TT 15	07/01/1966	Mardan	16/05/1993	16/05/1993	GMS Buneru Killi	16/05/1993
66	66	Ijaz Ahmad	MA Isl Sanad Faragh	B Ed Abdul Rauf	TT 15	08/04/1969	Mardan	21/10/1993	21/10/1993	GMS Malak Abad	21/10/1993
67	67	S. Mushtaq Ahmad	BA B.Ed	S. Muhammad Iqbar	TT 15	15/11/1972	Mardan	21/10/1993	21/10/1993	GHS Kass Korona	21/10/1993
68	68	Fazli Haq	Sanad	Amir Ghawas	TT 15	05/01/1957	Mardan	24/11/1987	28/04/1994	GMS Salak	28/04/1994
69	69	Shafiq ur Rehman	MA (Isl) Aalmia	Abdul Wadood	TT 15	01/04/1966	Mardan	14/05/1987	14/05/1987	GHS Kathi Garhi	01/05/1994
70	70	Saeed ur Rahman	FA CT	Saifur Rahman	TT 15	19/03/1974	Swabi	08/05/1994	08/05/1994	GHS Garyala	08/05/1994
71	71	Muhammad Ghafoor	MA Isl B.Ed	Sher Azim	TT 15	15/10/1971	Mardan	26/09/1994	26/09/1994	GHSS Pir Saddi	26/09/1994
72	72	Noorul Amin	BA B.Ed	Fazli Hakim	TT 15	01/11/1973	Mardan	27/10/1994	27/10/1994	GHSS No.1 Mardan	27/10/1994
73	73	Fayaz Khan	SSC Sanad	Hakeem Khan	TT 15	20/09/1965	Mardan	13/11/1994	13/11/1994	GMS Gumbat	13/11/1994
74	74	Altequllah	SSC Aalia	Inayatullah	TT 15	22/04/1971	Mardan	24/11/1994	24/11/1994	GHS Sharqi Holi	24/11/1994
75	75	Naseer	MA Arb Sanad	Ali Muhammad	TT 15	08/11/1970	Mardan	15/12/1994	15/12/1994	GCMS No.3	15/12/1994
76	76	Muhammad Ayub Khan	FA Sanad	Zabta Khan	TT 15	14/04/1974	Mardan	18/12/1994	18/12/1994	GMS Brijli Ghar	18/12/1994
77	77	Muhammad Farid	BA Sanad	Alta Muhammad	TT 15	07/09/1974	Mardan	22/12/1994	22/12/1994	GHS Khanjar	22/12/1994
78	78	Muhammad Farooq	MA Isl M.Ed	Sher Muhammad	TT 15	12/02/1972	Mardan	18/12/1994	18/12/1994	GHSS Mardan	20/03/1995
79	79	Inayat ur Rahman	FA Sanad	Molvi Fazli Rahman	TT 15	15/10/1975	Mardan	02/09/1995	02/09/1995	GHS Bari Cham	02/09/1995
80	80	Muhammad Naseem	MA Bed Sanad	Muhammad Qamar	TT 15	20/05/1972	Mardan	01/10/1995	01/10/1995	GMS Bahadar Khan Koty	01/10/1995
81	81	Akhtar Gul	FA TT Sanad	Taza Gul	TT 15	25/03/1974	Mardan	16/10/1995	16/10/1995	GMS Junqara	16/10/1995
82	82	Ghulam Yousef	BA B.Ed	Muhammad Ibrahim	TT 15	06/04/1957	DIR	12/12/1988	06/03/1996	GHS Park Takht Bhai	06/03/1996
83	83	Muhammad Attaul Karim	SSC Sanad	Hafiz Karim Ullah	TT 15	02/05/1968	Mardan	25/05/1996	25/05/1996	GMS Bari Cham	11/09/1996
84	84	Sultan ul Azeem	SSC Sanad	Muhibul Haq	TT 15	01/01/1963	Nowshera	06/05/1992	01/03/1997	GMS Ghaz Killi	01/03/1997
85	85	Inayat Ullah	MA M.Ed	Ajab Khan	TT 15	05/06/1965	Mardan	20/02/1995	23/06/1997	GMS Mohabat Abad	23/06/1997
86	86	Syed Asif Uddin	MA Isl Bed Sanad	Syed Ihsan Uddin	TT 15	02/01/1971	Mardan	23/06/1997	23/06/1997	GMS Surkh Dheri	23/06/1997
87	87	Ghulam Ullah	MA Isl Sanad Faragh	M Ed Naziful haq	TT 15	15/03/1976	Mardan	30/06/1997	30/06/1997	GMS Tariq Abad	30/06/1997

OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN

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**Final Seniority List of TT Teachers (Male) District Mardan**

Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	BPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing /App/Transf. Date	Remarks	
88	88	Baqi Billah	FA Sanad	Muhib ul Haq	TT 15	01/04/1965	Mardan	18/12/1986	18/12/1986	GMS Afzal Abad	05/08/1997	IDT
89	89	Hussain Ahmad	MA Isl B.Ed	Abdur Razique	TT 15	20/04/1975	Mardan	05/02/1998	05/02/1998	GCMS No.3	05/02/1998	
90	90	Zahoorul Haq	FA Aalmia	Noor ul Haq	TT 15	14/04/1968	Mardan	09/02/1998	09/02/1998	GHS Mohib Banda	09/02/1998	
91	91	M. Zakirul Haq	FA Aalmia	Saif ur Rehman	TT 15	01/01/1972	Mardan	10/02/1998	10/02/1998	GHSS Chamtar	10/02/1998	
92	92	M. Ashraf Ali Shah	MA Isl B.Ed	M. Munfat Shah	TT 15	06/09/1974	Mardan	10/02/1998	10/02/1998	GHS Nodah Toru	10/02/1998	
93	93	Nihad ullah	FA Aalmia	Habib ur Rahman Bacha	TT 15	04/09/1970	Mardan	23/02/1998	23/02/1998	GHS Sokai	23/02/1998	
94	94	Abdul Cayyum	FA Aalmia	Maula Bakhsh	TT 15	30/12/1969	Mardan	24/02/1998	24/02/1998	GHSS Mardan	24/02/1998	
95	95	Hameed ur Rahman	BA Aalmia	Muhammad Zada	TT 15	07/02/1974	Mardan	26/03/1998	26/03/1998	GMS Muli Banda	25/03/1998	
96	96	M Raees Khan	SSC Sanad	Khan Bahadar	TT 15	04/01/1979	Mardan	04/04/1998	04/04/1998	GMS Railway Station	04/04/1998	
97	97	Falaz ur Rahman	FA Aalia	Habib ur Rahman	TT 15	01/03/1969	Mardan	06/04/1998	06/04/1998	GHS No. 2 Bicket Gunj	05/04/1998	
98	98	Muhanmad Ayaz	MA Isl B.Ed	Muhammad Jabeen	TT 15	12/08/1973	Mardan	19/04/1998	19/04/1998	GMS But Seri	19/04/1998	
99	99	Muhammad Tayyab	MA Isl B.Ed	Muhammad Qamar	TT 15	24/05/1976	Mardan	06/04/1999	06/04/1999	GHS Kandar	05/04/1999	
100	100	H. Shaukat Ali	FA	Mukamil Shah	TT 15	24/04/1969	Mardan	08/04/1999	08/04/1999	GHS Labour Colony	02/04/1999	
101	101	Aziz ur Rehman	MA Isl B.Ed	Noor Muhammad	TT 15	17/04/1970	Mardan	08/04/1999	08/04/1999	GMS Gulf Bagh std	05/04/1999	
102	102	Abdul Ghafar	MA Isl Aalmia	Amin ul Haq	TT 15	24/04/1970	Mardan	10/04/1999	10/04/1999	GMS Spelano Dheri L.K	10/04/1999	
103	103	Umar Gul	Aalmia	Toor Lali	TT 15	12/04/1963	Malakand	01/11/1993	01/11/1993	GHS Jewar	11/05/1999	IDT
104	104	Diyar Khan	SSC Aalmia	Tawous Khan	TT 15	09/02/1975	Mardan	20/12/1999	20/12/1999	GHS Pati Kalan	20/12/1999	
105	105	Zia ur Rehman	FA Aalmia	Gul Rehman	TT 15	06/02/1970	Mardan	23/12/1999	23/12/1999	GMS Surkhabi	23/12/1999	
106	106	Imran Ullah	MA Isl B.Ed	Ghufranullah	TT 15	07/04/1975	Mardan	23/12/1999	23/12/1999	GHS Gujrat	23/12/1999	
107	107	Rasheed Ahmad	FA Sanad Faragh	Abdur Rahim	TT 15	12/04/1975	Mardan	23/12/1999	23/12/1999	GMS Mohabat Abad	23/12/1999	
108	108	Rizwanul Haq	MA Isl Aalmia	Shereenul Haq	TT 15	03/03/1975	Mardan	27/12/1999	27/12/1999	GHS Kot Takht Bhai	27/12/1999	
109	109	Molvi Muhammad Haq	SSC Sanad Faragh	Muhammad Ayub	TT 15	10/01/1979	Mardan	28/12/1999	28/12/1999	GMS Safaraz Killi	28/12/1999	
110	110	Muhammad Ayaz	BA Aalmia	Muhammad Aleem	TT 15	25/08/1972	Mardan	05/01/2000	05/01/2000	GMS Shamaoon Killi	05/01/2000	
111	111	Muhammad Ouresh	MA Isl Aalia	Rehan Ullah	TT 15	30/09/1969	Charsadda	24/02/1998	01/10/2000	GHS Sangao	01/10/2000	IDT
112	112	Hafiz Behram Ahmad	MA Isl Aalmia, B.Ed	Sherin Khan	TT 15	17/08/1971	Mardan	11/02/1998	11/02/1998	GHSS No.1 Mardan	22/12/2000	
113	113	Noor Habib	MA Aalmia	Molvi Habib Gul	TT 15	24/10/1952	Mardan	05/05/1976	04/10/2001	GMS Banu Bnada	04/10/2001	Retired 24-10-2012
114	114	Husamud Din	SSC D. Nizami	Saad ud Din	TT 15	13/05/1956	M.Agency	06/12/1981	01/01/2002	GMS Shah Noor Pul T. Bha	01/01/2002	IDT
115	115	Muhammad Siyar	D. Nizami	Haji Muhammad	TT 15	03/10/1960	Peshawar	12/05/1989	01/06/2002	GMS Mehmood Abad	01/06/2002	IDT
116	116	Lutful Ullah	FA Sanad	Shafi Ullah	TT 15	06/08/1969	Malakand	26/09/1992	01/04/2003	GMS Musafar Khan Killi	01/04/2003	IDT

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Final Seniority List of TT Teachers (Male) District Mardan

Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	BPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing /App/Transf er Date	Remarks
117	117	Ubaid Ullah UM Aalmia	Muhib Ullah	TT 15	20/11/1956	Mardan	20/11/1976	21/01/2004	GMS Tambulak	21/01/2004	IDT
118	118	Ihsan ullah BA Sanad	Abdullah	TT 15	14/04/1981	Mardan	06/04/2004	06/04/2004	GHSS Baghichà Dheri	06/04/2004	
119	119	Muhammad Islam Sanad	Abdul Hamid	TT 15	01/11/1966	DIR	27/06/1990	01/06/2005	GMS Zandu Dheri	01/06/2005	IDT
120	120	Syed Altbar Gabir FA Aalmia	Banjar Khan	TT 15	10/02/1977	DIR	01/03/2006	08/12/2006	GHSS Takht Bhai	08/12/2006	IDT
121	121	Zawar Hussain MA Arb Aalmia, B.Ed	Ihsanullah	TT 15	14/04/1972	Mardan	22/02/2007	22/02/2007	GHS Naseer Killi	22/02/2007	
122	122	Mukhtar Alam FA Aalmia	Khan Badshah	TT 15	30/03/1964	Mardan	23/02/2007	23/02/2007	GMS Landai	23/02/2007	
123	123	Muhammad Hassan SSC Aalmia	Muhammad Ishaq	TT 15	20/03/1970	Mardan	23/02/2007	23/02/2007	GMS Ganjal T. Bhai	23/02/2007	
124	124	Muhammad Arshad SSC Aalmia	Rahman Gul	TT 15	01/04/1971	Mardan	23/02/2007	23/02/2007	GHSS Takht Bhai	23/02/2007	
125	125	S. Muhammad Arif FA Aalmia	S. Muhammad Sadiq	TT 15	13/05/1971	Mardan	17/06/2006	23/02/2007	GHS Bala Garhi	23/02/2007	
126	126	Mufti Amjad Ali MA Arb Aalmia	Khan Bahadar	TT 15	15/04/1972	Mardan	23/02/2007	23/02/2007	GHS Khadi Killi	23/02/2007	
127	127	Hanifullah MA Isl Aalmia	Abdus Sattar	TT 15	02/02/1973	Mardan	23/02/2007	23/02/2007	GHSS Hathian	23/02/2007	
128	128	Muhammad Hussain FA Aalmia	Muhammad Ishaq	TT 15	02/02/1973	Mardan	23/02/2007	23/02/2007	GHSS Takkar	23/02/2007	
129	129	S. Aziz Ahmad Shah MA Aalmia	S. Ahmad Hussain	TT 15	05/03/1974	Mardan	23/02/2007	23/02/2007	GHS Gulrat	23/02/2007	
130	130	Said Riaz Ahmad FA Aalmia	Said Anwar Ahmad	TT 15	15/05/1974	Mardan	23/02/2007	23/02/2007	GMS Nawan Killi Rustam	23/02/2007	
131	131	Noorul Haq FA Aalmia	Sabir Khan	TT 15	10/09/1974	Mardan	23/02/2007	23/02/2007	GHS Parkho Dheri	23/02/2007	
132	132	Qazi Muhammad Ibrar FA Aalmia	Qazi Fazal Badshah	TT 15	31/01/1975	Mardan	23/02/2007	23/02/2007	GMS Hoti Mardan	23/02/2007	
133	133	Syed Murtaza FA Aalmia	Syed Muhammad Nabi	TT 15	03/07/1975	Mardan	23/02/2007	23/02/2007	GMS Cheena	23/02/2007	
134	134	Fazli Rahim MA Isl Aalmia	Abdus Sattar	TT 15	05/01/1976	Mardan	23/02/2007	23/02/2007	GMS Khazana Dheri	23/02/2007	
135	135	Muhammad Jehan Zeb Khan SSC Aalmia	Abdul Hassan	TT 15	14/02/1976	Mardan	23/02/2007	23/02/2007	GMS Sadiq Abad	23/02/2007	
136	136	Gul Bad Shah FA Aalmia	Tali Zar	TT 15	24/02/1976	Mardan	23/02/2007	23/02/2007	GMS Muhammad Din Killi	23/02/2007	
137	137	S.M. Yahya Jan FA Aalmia	S. Shakirullah Ina	TT 15	15/04/1978	Mardan	23/02/2007	23/02/2007	GHS Gulrat	23/02/2007	
138	138	Khalid Mehwed MA Isl Aalmia	Husnul Maab	TT 15	15/04/1978	Mardan	23/02/2007	23/02/2007	GMS Kot Jungara	23/02/2007	
139	139	Shaukat Ali MA Arb Aalmia	Mehboobur Rahman	TT 15	02/03/1979	Mardan	23/02/2007	23/02/2007	GMS Mir Baz Ghaz	23/02/2007	
140	140	Shamsur Rahman SSC Aalmia	Gul Rahman	TT 15	09/01/1967	Mardan	24/02/2007	24/02/2007	GHS Baringan	24/02/2007	

Handwritten notes in the left margin: 12/11/13, 15/3/13, 21/22-4-2013, and other illegible scribbles.

OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN

Final Seniority List of TT Teachers (Male) District Mardan

3

Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	BPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing /App/Transf. on Date	Remarks
141	141	Ayub Khan MA Isl Aalmia	Ameer Shah	TT 15	22/02/1968	Mardan	24/02/2007	24/02/2007	GHS Kallanc	24/02/2007	
142	142	Roohul Amin FA Aalmia	Momin Khan	TT 15	13/05/1970	Mardan	24/02/2007	24/02/2007	GHSS Hathijan	24/02/2007	
143	143	Fazli Karim SSC Aafia, Aalmia	Fazli Mehboob	TT 15	02/02/1971	Mardan	24/02/2007	24/02/2007	GHS Kohi Barmol	24/02/2007	
144	144	Muhammad Shoab BA Aalmia	Muhammad	TT 15	03/02/1971	Mardan	24/02/2007	24/02/2007	GHS Outab Garh T. Bahi	24/02/2007	
145	145	Abidur Rahman SSC Aalmia	Fazli Manan	TT 15	12/06/1972	Mardan	24/02/2007	24/02/2007	GHSS Dheri Likcani	24/02/2007	
146	146	Gul Sher Khan Hon. Azab Aalmia	Shamsher Khan	TT 15	05/03/1973	Mardan	24/02/2007	24/02/2007	GHS Garhi Kacura	24/02/2007	
147	147	Riaz Uddin SSC Aalmia	Abdul Haleem	TT 15	22/04/1973	Mardan	24/02/2007	24/02/2007	GMS Baido Kili	24/02/2007	
148	148	Sher Bahadar MA Isl Aalmia	Huner Gul	TT 15	05/01/1974	Mardan	24/02/2007	24/02/2007	GMS Mehtar Ghundai	24/02/2007	
149	149	Aziz Ahmad FA Aalmia	Bashir Ahmad	TT 15	24/02/1975	Mardan	24/02/2007	24/02/2007	GMS Pepal	24/02/2007	
150	150	Fayaz Ali FA Aalmia	Mehar Muhammad	TT 15	02/09/1975	Mardan	24/02/2007	24/02/2007	GCMHS Boys	24/02/2007	
151	151	Munir Ahmad FA Aalmia	Noor ul Haq	TT 15	05/09/1976	Mardan	24/02/2007	24/02/2007	GMS Barat Khei	24/02/2007	
152	152	Siraj uddin BA Aalmia	Rahman Gul	TT 15	22/10/1976	Mardan	24/02/2007	24/02/2007	GHS Qasmi	24/02/2007	
153	153	Abdul Aziz FA Aalmia	Raham Karim	TT 15	20/12/1976	Mardan	24/02/2007	24/02/2007	GHS Gulfi Bagh	24/02/2007	
154	154	Naeemullah FA Aalmia	Abdul Ghani	TT 15	27/03/1977	Mardan	24/02/2007	24/02/2007	GHS Ghalla Dher	24/02/2007	
155	155	Mujahidul Haq BA Sanad, Aalmia	Misbah Ahmad	TT 15	01/02/1978	Mardan	24/02/2007	24/02/2007	GHS Ibrahim Khan Kili	24/02/2007	
156	156	Mushtaq Ali FA Aalmia	Aman Gul	TT 15	16/04/1978	Mardan	24/02/2007	24/02/2007	GHS Rustam	24/02/2007	
157	157	Naseem ul Haq SSC Aalmia	Abdul Haq	TT 15	02/03/1971	Mardan	26/02/2007	26/02/2007	GHS Alo Mardan	26/02/2007	
158	158	Muhammad Ibrahim SSC Aalmia	Muhammad Abdul Satar	TT 15	02/03/1977	Mardan	26/02/2007	26/02/2007	GMS Shawa Banda	26/02/2007	
159	159	Amanullah SSC Aalmia	Muhammad Khan	TT 15	09/10/1980	Mardan	26/02/2007	26/02/2007	GMS Kot Ismail Zai	26/02/2007	
160	160	Noor Ullah FA Aalmia	Karim Dad	TT 15	06/03/1979	Mardan	27/02/2007	27/02/2007	GHSS Mayar	27/02/2007	
161	161	Kifayatullah MA Isl Aalmia	Nazir Ullah	TT 15	04/02/1976	Mardan	05/03/2007	05/03/2007	GMS Sherabad	05/03/2007	
162	162	Bashir Ahmad MA Isl Khassa	Muhammad Farcoq	TT 15	15/03/1978	Mardan	08/10/2007	08/10/2007	GHS Shah Baig	08/10/2007	
163	163	Faridul Haq MA Isl Aalmia	Aminul Haq Kausar	TT 15	16/04/1978	Mardan	08/10/2007	08/10/2007	GHSS Takkar	08/10/2007	
164	164	Arshed Iqbal BA Aalmia, B.Ed	Qajeer Gul	TT 15	18/03/1980	Mardan	08/10/2007	08/10/2007	GHS Sikandari	08/10/2007	
165	165	Husnul Maab MA Isl B.Ed	Azizul Haq	TT 15	06/04/1981	Mardan	08/10/2007	08/10/2007	GHS Palo Dheri	08/10/2007	
166	166	Fazli Rahman MA Isl Aafia, B.Ed	Behram Khan	TT 15	20/05/1978	Mardan	09/10/2007	09/10/2007	GHS Saro Shah	09/10/2007	
167	167	Irfanullah FA Aalmia	Abdul Ghafoor Khan	TT 15	01/07/1978	Mardan	11/10/2007	11/10/2007	GMS Zoor Abad	11/10/2007	



OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN

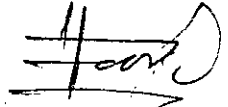
**Final Seniority List of TT Teachers (Male) District Mardan**

Sr. No.	Seniority No.	Name with Academic & Professional Qualification	Father's Name	App. Post Held	Date of Birth	Domicile	Date of entry into Govt. service	Date of Appointment on the present post	Place of posting	TT Passing (App/Transf) Date	Remarks		
168	168	Ali Rahman MA Isl	Aalmia	Sultan Muhammad	TT 15	01/01/1976	Mardan	22/10/2007	22/10/2007	gms Safi Abad	22/10/2007		
169	169	Ihteshamul Haq	FA	Aalia	Baqi Billah	TT 15	01/05/1983	Mardan	18/03/2009	18/03/2009	GMS Garyala Bala	18/03/2009	
170	170	Muhammad Asif	MA Isl	Med Alamia	Khan Bahadar	TT 15	15/06/1981	Mardan	17/02/2010	17/02/2010	GHS Toru Malra	17/02/2010	
171	171	Muhammad Amin	MA	M.Ed	Muhammad Halim	TT 15	04/02/1981	Mardan	25/10/2004	18/02/2010	GHSS Gujar Garhi	18/02/2010	
172	172	Shakinullah	MA	B.Ed	Abdul Hameed	TT 15	15/03/1983	Mardan	18/02/2010	18/02/2010	GMS Sarband	18/02/2010	
173	173	Ismail Ahmad	MA	Aalia, B.Ed	Shamroz Khan	TT 15	10/03/1983	Mardan	18/02/2010	10/02/2010	GHS Sanga Takht Rhai	18/02/2010	
174	174	Kifayatullah	MA	Khassa, B.Ed	Shahjehan	TT 15	05/04/1983	Mardan	18/02/2010	18/02/2010	GMS Bakhshali	18/02/2010	
175	175	Muhammad Yousaf	MA	Khassa	Hakeem Ullah	TT 15	10/04/1985	Mardan	18/02/2010	18/02/2010	GMS Suri Malardri	18/02/2010	
176	176	Muhammad Tawafiq	MA	Khassa	Shamand Khan	TT 15	20/04/1986	Mardan	18/02/2010	18/02/2010	GMS Anwar Khan Killi	18/02/2010	
177	177	Muhammad Israil	MA	Aalia	Molvi Abdul Khaliq	TT 15	08/04/1974	Mardan	26/10/2004	19/02/2010	GMS Khura Banda	19/02/2010	
178	178	Sajjad Ahmad	MA	Khassa	Sartaraz Khan	TT 15	12/11/1978	Mardan	10/02/2010	19/02/2010	GMS Mahal Zareenabad	19/02/2010	
179	179	Muhammad Hussain	MA	Aalmia; B.Ed	Musannif Shah	TT 15	15/04/1981	Mardan	25/10/2004	19/02/2010	GMS Hamza Khan	19/02/2010	
180	180	Fazle Mula	MA	Aalia, B.Ed	Mudul Hakeem	TT 15	02/01/1983	Mardan	19/02/2010	19/02/2010	GHS Jalala	19/02/2010	
181	181	Latif Khan	MA	Aalia	Syed Wali Ur Rahman	TT 15	03/03/1984	Mardan	19/02/2010	19/02/2010	GHS Ikram Pur	19/02/2010	
182	182	Farooq Ahmad	BA	Khassa	Hakim Hidayatullah	TT 15	04/02/1986	Mardan	19/02/2010	19/02/2010	GMS Bahi Khan	19/02/2010	
183	183	Zahid Hussain	MA	Khassa	Muffariq Shah	TT 15	15/01/1983	Swabi	19/11/2007	01/07/2011	GHSS Shahbaz Garhi	01/07/2011	IDT

Endst:No.....19204.....Dated Mardan the 31/12/2012

Copy forwarded for information and necessary action to the:-

1. Director Elementary and Secy. Education Khyber Pakhtunkhwa Peshawar.
2. District Coordination Officer Mardan.
3. All the Principals/HeadMasters of GHSS/GHS/GMS. In Mardan District.

  
Noor Zada Khalozai  
Executive Distric  
Officer E&S  
EducationMardan

31/12/2012



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) MARDAN.**

**ADJUSTMENT.**

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11-07-2012 and Finance Department Endst.No.SO(FR)/FD/10-22(F)2010 dated 16-07-2012, the following Male TT's BPS-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.18910-1520-64510) plus usual allowance as admissible under the rules on regular basis under the existing policy of provincial Govt. on the term and condition given below from the date of Notification vide Director (E&SE) Peshawar Endst.No.249-54/F.No.1/Promotion Senior TT BPS-16 Dated 01-08-2017. They are hereby further adjusted in High/Higher Secondary School as noted against each in District Mardan adjusted against the vacant Senior TT BPS-16 posts as noted against each on the term and conditions as mentioned in the above referred Notification on "School based" policy with immediate effect:-

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Where Adjusted	Remarks
1	143	Fazli Kareem	GHS Ghala	02-02-71	GHS Ghala	1/3 Upgraded
2	144	Muhammad Shoaib	GHS Qatab Garh	03-02-71	GHS Qatab Garh	1/3 Upgraded
3	145	Abid Ur Rahman	GHSS Dheri Likpani	12-06-72	GHSS Dheri Likpani	1/3 Upgraded
4	146	Gul Sher Khan	GHS <i>Sikandari</i>	05-03-73	GHS Tambulak	A.V.P.
5	147	Riaz Ud Din	GMS Baido Killi	22-04-73	GHS Shah Baigh	1/3 Upgraded
6	148	Sher Bahadar	GMS Melhar Ghundai	05-01-74	GHSS Pir Saddi	A.V.P.
7	149	Aziz Ahmad	GMS Pipal	24-02-75	GHS Babozai	1/3 Upgraded
8	150	Fayaz Ali	GHSS Mohabat Abad	02-09-75	GHSS Mohabat Abad	1/3 Upgraded

The following TT is hereby adjusted on their own pay and BPS-15 in middle school noted against each with immediate effect:-

S.No	Name of Teacher	Present School	Adjusted	Remarks
1	Bashir Ahmad	GHS Shah Baigh	GMS Baido Killi	Vice S.No. 05

**Terms and Conditions:-**

- 1 They would be on probation period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed 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 TADA is allowed for joining his duty.

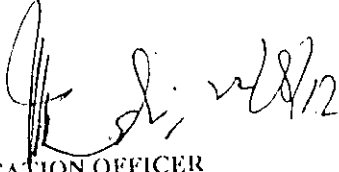

- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

81  
(IJAZ ALI KHAN)  
DISTRICT EDUCATION OFFICER  
(MALE) MARDAN.

Endst: No. 7081/G /Promotion to STT file Dated 27/08 /2017.

Copy forwarded for information and necessary action to the:-

- 1 Director Elementary & Secondary education Khyber Pakhtunkhwa Peshawar.
- 2 All the Principal/Headmaster Concerned.
- 3 District Accounts Officer Mardan.
- 4 Official Concerned

  
DISTRICT EDUCATION OFFICER  
(MALE) MARDAN 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1002 / 2013

Muhammad Shuaib TT GHS Qutabgarh Takht Bhai.....Appellant

**Versus**

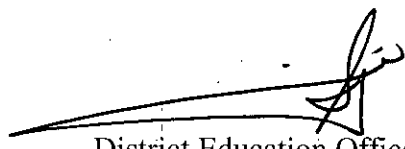
The Gov. of K.P.K. through Secretary (E & SE) & Others.....Respondents

**INDEX**

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	03

Respondents No 2 & 3

Director (E&SE) Department  
Govt. of Khyber Pakhtunkhwa

  
District Education Officer  
(Male) Mardan

34

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1002 / 2013

Muhammad Shuaib TT GHS Qatabgarh Takht Bhai.....Appellant

**Versus**

The Gov. of K.P.K. through Secretary (E & SE) & Others.....Respondents

Para wise comments on behalf of Respondents No 2 & 3.

Respectfully Sheweth,

PRELIMINARY OBJECTION:

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appellant has not come to this Honourable Tribunal with clean hands.
5. That the instant appeal is based on malafide intention and the appellant concealed the material facts, hence liable to be dismissed.
6. That the respondent / provincial govt issued notification dated 21-02-2013 in good faith and in public interest. (Copy of which is already appended as Annex-B of the instant appeal)
7. That the seniority list of the TT was prepared according to the rules and seniority cum fitness as having prescribed service duration and requisite professional qualification of the post in hand.
8. That the seniority for the promotion of the Theology Teacher was considered from having requisite professional qualification prescribed for initial recruitment of TT along with five years service particularly for Senior Theology Teacher.
9. That part from seniority, eligibility for promotion is considered from the date of taking of charge of the present post after having requisite professional qualification of that post.
10. That the promotion for TT to STT, when having same service duration, then dates of birth is considered.

FACTUAL OBJECTIONS:

1. Para No 1 pertains to record, hence no comments.
2. Para No 2 pertains to record, hence no comments.
3. Para No 3 pertains to record, however none of the officials were ignored from their due right hence no comments.
4. Para No 4 pertains to record, further more it is clear from the notification by respondent no 2 vide dated 21/02/2013 only 64 TTs were proposed to be promoted to BPS-16, while

the appellant is placed in seniority list at serial no 144 and the last promoted TT to STT is at serial no 142. As per policy "By promotion on the basis of seniority-cum fitness from amongst Theology Teacher, with at least five years service as such as having qualification as prescribed for initial recruitment of Theology Teacher" according to which the appellant is still not eligible for the post of STT being junior in cadre as well.

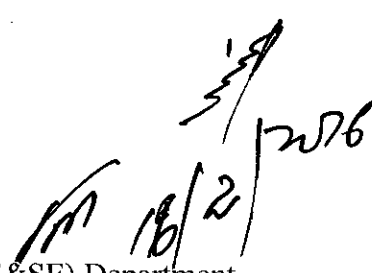
5. Para No 5 pertains to record, hence no comments.


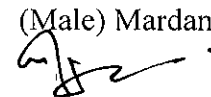
GROUNDS:

- A. Para A is incorrect, as all the officials have been dealt in accordance with rules and law.
- B. As replied in Para A.
- C. Para C is incorrect and the appellant has been dealt in accordance with the law.
- D. Para D is incorrect, No discrimination whatsoever has been made, promotion to the next grade is entertained on the basis of date of taking over charge and having requisite professional qualification for the post in hand, hence denied.

Therefore it is humbly prayed that keeping in view the above mentioned facts the instant appeal may kindly be dismissed with cost.

Respondents No 2 & 3

  
 Director (E&SE) Department  
 Govt. of Khyber Pakhtunkhwa  
 (RESPONDENTS NO 1 & 2).

  
 District Education Officer  
 (Male) Mardan  


BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No. 1002 / 2013

Muhammad Shuaib TT GHS Qutabgarh Takht Bhai.....Appellant

**Versus**

The Gov. of K.P.K. through Secretary (E & SE) & Others.....Respondents

AFFIDAVIT

I, Mr Muhammad Haroon Legal Advisor Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by respondents No 2 & 3 is true to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Deponent



Muhammad Haroon  
16101-4819092-1

Identified By:

Advocate General  
Khyber Pukhtunkhwa  
Peshawar



Before the Hon'ble Service Tribunal  
Peshawar.

Muhammad Shoaib

Govt vs

Application for Adjudgment

Respectfully sheweth

1. That the above titled case before this Court today for hearing.
2. That the Counsel for the appellant is ill due to fever and throat and he cannot attend this Court today. It is therefore humbly prayed that the case may adjourn to some other date.

Applicant  
through  
Counsel

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1002 /2013**

Muhammad Shoaib.....Appellant

Versus

DPO Mardan and others.....Respondents

---

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE  
TO REPLY FILED BY RESPONDENTS NO.2 & 3.**

---

Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering respondents are erroneous and frivolous. Appellant has approached the Tribunal with a bonafide claim having a strong cause of action and for that matter locus standi to file the appeal wherein all the facts have been brought before the Hon'ble Tribunal with no concealment of facts. Estoppel does not operate against the law. The appeal is in its correct form and shape with all necessary parties properly arrayed as Respondents and is within time.

**Facts:**

- 1&2. Being not replied hence admitted.
  
3. Reply to para-3 also admits the recommendation of appellant for promotion to the post of STT by the DPC but inspite of the same appellant was not promoted in violation of the law.

4. The reply to Para-4 of the appeal is also evasive in nature which amounts to admission. As per the impugned Notification only 64 TTs were promoted in violation of the recommendation of the DPC which is against the law. The appellant is eligible for promotion but was illegally dropped without any reason whatsoever.
5. Being not replied hence admitted.

**Grounds:**

- A. Incorrect. The appellant was not treated according to law in accordance with the principles of justice and fair-play.
- B. Being not replied hence admitted.
- C. Incorrect. Appellant was not dealt with in accordance with law rather discriminated.
- D. Misconceived. Appellant was fulfilling the conditions for promotion having the prescribed qualification and length of service but ignored without any lawful justification.

It is, therefore, humbly prayed that the reply of answering Respondents No.2 & 3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

Khaled Rahman  
Advocate, Peshawar

**Dated: 09/06/2016**

**Verified**

As per instructions that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Advocate

Service Appeal No. 1002 /2013

Muhammad Shoaib.....Appellant

Versus

DPO Mardan and others.....Respondents

---

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE  
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- C. Incorrect. Appellant was not dealt with in accordance with law rather discriminated.
- D. Misconceived. Appellant was fulfilling the conditions for promotion having the prescribed qualification and length of service but ignored without any lawful justification.

It is, therefore, humbly prayed that the reply of answering Respondents No.2 & 3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

Khaled Rahman  
Advocate, Peshawar

Dated: 09/06/2016

**Verified**

As per instructions that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Advocate

Service Appeal No. 1002 /2013

Muhammad Shoaib.....Appellant

Versus

DPO Mardan and others.....Respondents

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**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE  
TO REPLY FILED BY RESPONDENTS NO.2 & 3.**

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Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering respondents are erroneous and frivolous. Appellant has approached the Tribunal with a bonafide claim having a strong cause of action and for that matter locus standi to file the appeal wherein all the facts have been brought before the Hon'ble Tribunal with no concealment of facts. Estoppel does not operate against the law. The appeal is in its correct form and shape with all necessary parties properly arrayed as Respondents and is within time.

**Facts:**

1&2. Being not replied hence admitted.

3. Reply to para-3 also admits the recommendation of appellant for promotion to the post of STT by the DPC but inspite of the same appellant was not promoted in violation of the law.

4. The reply to Para-4 of the appeal is also evasive in nature which amounts to admission. As per the impugned Notification only 64 TTs were promoted in violation of the recommendation of the DPC which is against the law. The appellant is eligible for promotion but was illegally dropped without any reason whatsoever.
5. Being not replied hence admitted.

**Grounds:**

- A. Incorrect. The appellant was not treated according to law in accordance with the principles of justice and fair-play.
- B. Being not replied hence admitted.
- C. Incorrect. Appellant was not dealt with in accordance with law rather discriminated.
- D. Misconceived. Appellant was fulfilling the conditions for promotion having the prescribed qualification and length of service but ignored without any lawful justification.

It is, therefore, humbly prayed that the reply of answering Respondents No.2 & 3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

Khaled Rahman  
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Advocate