

04.08.2017

Counsel for the appellant and Addl. AG for the respondents present. The learned counsel for the appellant brought to the notice of this Tribunal the order sheet dated 03.08.2016 whereby this Tribunal has directed the department to provide approved sanctioned strength of SETs as on 14.2.2007, Seniority list of SETs and list of 243 notified SETs who had been given selection grade. The learned counsel for the appellant further submitted that their cases would be disposed of if the seniority list of 243 persons is provided by the department by omitting the duplication, died and those who were already promoted and were not entitled for selection grade. To come up for submission record on 30.08.2017 before the D.B.



Member

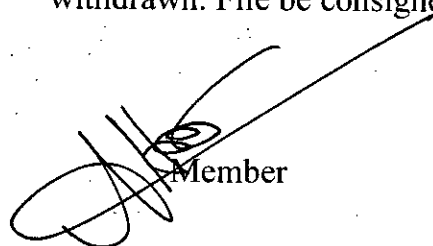

Chairman

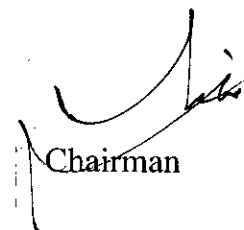
30.08.2017

Appellant alongwith counsel, Addl. AG alongwith Hameedur Rahman, AD for the respondents present. Counsel for the appellant requested for withdrawal of the appeal.

In view of the above, the present appeal is dismissed as withdrawn. File be consigned to the record room.


30-8-17


Member


Chairman


ANNOUNCED

30.08.2017

03.08.2016

Counsel for the appellant and Addl: AG for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 12.12.2016.


Member


Member

12.12.2016

Since 12th December, 2016 has been declared as a public holiday an account of 12th Rabi-ul-awal. Case is adjourned to 17.04.2017 before D.B.


Reader

17.04.2017

Counsel for the appellant present. Mr. Hameed-ur-Rehman, AD (Litigation), alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 04.08.2017 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

24.06.2015

Agent of counsel for the appellant, M/S Khurshid Khan, SO and Javed Ahmed, Supdt. alongwith Addl: A.G for respondents present. Para-wise comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 13.11.2015.


Chairman

13.11.2015

Appellant with counsel and ~~Addl~~: AG for respondents present. Arguments could not be heard due to paucity of time. Therefore, the case is adjourned to 5-4-2016 for arguments.


Member


Member

05.042016


Clerk to counsel for the appellant and AAG for respondents present. Clerk to counsel for the appellant requested for adjournment. To come up for arguments on 03.08.2016.


Member

390/13

23.12.2014

Clerk to counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Mosam Khan, AD for the respondents present. The Tribunal is incomplete. To come up for the same on 10.3.2015.


MEMBER

10.03.2015

Agent of counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1 and Mosam Khan, AD for respondent No. 4 alongwith Addl: A.G present. Requested for adjournment. To come up for written reply on 23.6.2015 before S.B.


Chairman

23.06.2015

Agent of counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1 and Javed Ahmed, Supdt. for respondent No. 4 alongwith Addl: A.G for all respondents present. Requested for adjournment. To come up for written reply/comments on 24.6.2015 before S.B.


Chairman

11.2.2014

Counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan SO, Sajjad Rashid AD, Muhammad Irshad, Supdt. and Sultan Shah, Assistant for the respondents present and requested for time. To come up for written reply on 30.4.2014.

MEMBER

MEMBER

30.04.2014

Counsel for the appellant, Mr. Muhammad Jan, GP with Khursheed Khan, SO, Sajjad Rashid, AD and Muhammad Irshad, Supdt. for the respondents present and stated that written reply prepared and placed before the respondents for signature. To come up for written reply on 30.6.2014.

MEMBER

23.6.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Khursheed Khan, SO, Sajjad Rashid AD and Imad Ahmad, Assistant for the respondents present. Respondents need further time. To come up for written reply on 15.10.2014.

MEMBER

MEMBER

15.10.2014


Junior to counsel for the appellant and Mr. Kabeerullah Khattak, Asstt. AG with Khursheed Khan, SO and Mosam Khan, AD for respondents No. 1 & 4 present and requested for time. Fresh notice be issued to respondent No.2 & 3. To come up for written reply on 23.12.2014.

MEMBER

29.08.2013

Counsel for the appellant and heard on preliminary.

Contended that the appellant has not been treated in accordance with the law/rules. He further contended that similar nature of cases have already been admitted to regular hearing. In this respect he referred to one in service appeal No.1322/12 titled Ikramullah vs Govt which has been fixed for hearing before the Hon'ble Final Bench-II on 10.10.2013. On the same analogy the instant appeal also admitted for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notice be issued to the respondents. Case adjourned to 09.12.2013 for submission of written reply before Final Bench-II.


Member.

9.12.2013

Clerk to counsel for the appellant, Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO for respondent No. 1, and Mr. Mosam Khan, AD for respondents No. 4 and Mr. Muhammad Irshad, SO for respondent No. 2 present and requested for adjournment. Fresh notice be issued to the respondent No.3. To come up for written reply positively on 11.2.2014. Reader is directed to record Note Reader in connected appeals.


MEMBER


MEMBER

*Appellant deposited
Process fee & Security
Rs. 2000/- Bank Receipt
attached with file*

9.5.2013

Munshi to counsel for the appellant present and requested for adjournment. Case adjourned to 3.7.2013 for preliminary hearing.

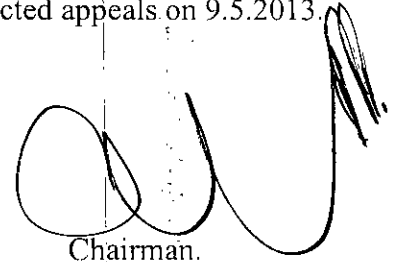

Member.

03.07.2013

Clerk to counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 29.08.2013.


Reader

3. 26.3.2013 Counsel for the appellant has sent an application requesting for adjournment in the connected appeals. To come up for preliminary hearing alongwith connected appeals on 9.5.2013.

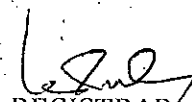
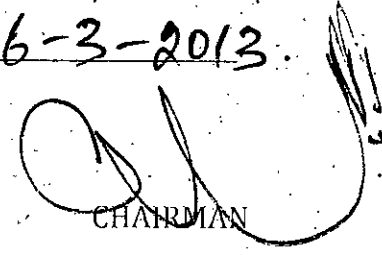
A handwritten signature in black ink, consisting of a large loop followed by a series of smaller loops and a final vertical stroke.

Chairman.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 390/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13/02/2013	<p>The appeal of Mst. Azmat Shaheen presented today by Mr. Ghulam Nabi 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	18-2-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>26-3-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

Service Appeal No. 390 / 2013

Azmat Shaheen P S T
G.G.P.S. Abdul Akbar Koroona
District Charsada.

.....Appellant


Versus

Govt. of K.P.K., through Secretary Schools & Literacy
Department, Peshawar & others.....Respondents

INDEX

S.No.	Description of Documents	Annexure	Pages
1.	Service Appeal		1-9
2.	Affidavit		10
3.	Application for Interim Relief alongwith Affidavit		11-13
3.	Copy of the Notification issued by the Government	'A'	14-15
4	Copy of the Notification dated 13.11.2012	'B'	16-30
5	Copies of the both the notifications	'C & C/1'	31-33

Through Appellant


Ghulam Nabi
Advocate, Peshawar.

BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWARService Appeal No. 390 / 2013

N.W.F. Province
 District Peshawar
 No. 404
 13/2/2013

Azmat Shaheen P S T
 G.G.PS. Abdul Akbar Koroona
 District Charsada.

.....Appellant

Versus

1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Peshawar.
2. Secretary to Govt. of K.P.K., Finance Department, Civil Secretariat, Peshawar.
3. Secretary to Govt. of K.P.K., Establishment Department Civil Secretariat, Peshawar
4. Director Elementary & Secondary Education K.P.K., Peshawar.

.....Respondents

Appeal u/s 4 of NWFP Service Tribunal Act, 1974 to the effect that the newly inducted condition of FA/FSc for the promotion to BPS-14/15 of the PST Teachers may please be set-aside and the promotion may please be granted on seniority-cum-fitness basis purely.

13/2/13

Prayer in Appeal:

On acceptance of this appeal the condition of FA/FSc from the above noted notification for the promotion of the PST Teachers may please be removed and the promotion may please be granted on seniority-cum-fitness basis.

Respectfully Sheweth:

1. That the appellants are belonging to the Education Department, all serving on the posts as mentioned against their names in the heading of the appeal.
2. That all the appellants have got at their credit on the above said post a long tenure of service extending over 20 to 40 years.
3. That previously the basic qualification for the appointment at the post of PST was fixed as Matric Certificate alongwith the PST Certificate from a recognized Institution and all the appellants were appointed on the above said posts having the said qualification as was the requirement at the time of the appointment of the appellants.
4. That the basic qualification for the post of PST was duly enhanced with basic qualification from Matric to

F.A./F.Sc in the year 2011 and many other colleagues of the appellants were then appointed on the same posts of PST having their qualification as F.A./F.Sc along with the PST Certificate.

5. That in the year 2007 a policy of upgradation was promulgated by the then Provincial Government, whereby the PTC, Teachers were upgraded from BPS-07 to BPS-12 on the basis of the length of the service. (Copy of the Notification issued by the Government is attached herewith as Annexure-'A').
6. That again a similar summary was formulated at the initial stage by the Education Department that the PST Teachers will be upgraded to BPS-15 having 22 years service, whereas the teachers having 15 years service will be upgraded to BPS-14.
7. That the above said policy was just as according to the justice and demand of the teachers community, however later on the said policy was converted from time scale to the education scale, whereby the promotion policy for the PST Teachers was formulated as under:

"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

10 years service and having qualification prescribed for initial recruitment of primary school teacher.

Primary School Teacher

BPS-14

By promotion on the basis of seniority-cum-fitness' from amongst school teachers with at least 05 years service as such and having qualification prescribed for initial recruitment of primary school teachers.

8. That thereby all the fresh appointed F.A/PST have been given the BPS-12, whereas the holders of F.A. Certificate with 10 years length of service may be upgraded/promoted to BPS-15 and the PSTs with the F.A. qualification having 05 years service may be upgraded to BPS-14. (Copy of the Notification dated 13.11.2012 is attached herewith as Annexure-'B').
9. That the appellant alongwith his other hundreds of the colleagues having their services extending from 20 to 40 years have been totally ignored and have not been given any chance of upgradation/promotion throughout

their professional career inspite of having such a long spotless tenure of service.

10. That this attitude of the respondent department to give benefit to the PST teachers with the F.A./F.Sc qualification over the teachers with the Matric qualification has been formulated without any cogent/legal grounds but just to give benefit to the blue eyed teachers of the respondent department, whom have been appointed in their tenure.
11. That all the appellants are also equally entitled to be upgraded on the basis of his tenure of service and be given the same benefit as it has been given to the other PSTs teachers having the F.A. Certificates, as the higher qualification of F.A. can not by any means made the basis for giving any sort of above said benefit to the teachers.
12. That in this respect the appellants have also moved their representation to the concerned authorities, thereby explaining their grievance, however no response whatsoever has yet been received by the appellants till the filing of this Service Appeal.
13. That the appellants having got no other efficacious/adequate now approaches this Honourable Tribunal on the following grounds amongst the others.

Grounds

- a) That act of the respondent department, thereby depriving the appellants from the above said benefit of upgradation is illegal unlawful without authority/jurisdiction, as well as being based on the malafide intentions of the respondent department is liable to be set-aside.
- b) That since hundred and hundreds of the teachers have been treated in a discriminatory manner and have been deprived of the above said benefit mere on the ground that they are not having the qualification of FA/FSc is an act unjust and without any reasonable ground, as the basic qualification at the time of the appointment of the appellant was Matric with PST and the basic qualification at the time of the appointment of the benefited teachers were FA/FSc with PST, hence no privilege can be granted to the persons, whom have been appointed on the prescribed qualification.
- c) That the appellants have been serving on the above said since long, whereas the minimum tenure of the service amongst the appellant is 18 years and the maximum tenure amongst the appellant is extended to 40 years and since long all the appellants have been waiting for their turn

to be promoted/upgraded to some higher scale, however after having a tenure of such a long legitimate expectations the appellants have been treated unlawfully without any cogent/solid grounds.

- d) That it is very respectfully submitted it has never happened that in the cases of upgradation/promotion the factor of seniority should be abolished/ignored totally and the grounds of upgradation/promotion should be made mere educational qualification, whereas the upgradation/promotion has always been made on the basis of seniority-cum-fitness and have never at the basis of higher qualification whatsoever it may be. Furthermore still it is not the higher qualification for the teachers whom have been going thorough get benefit for the above said notification, but with the passage of time as the basic qualification has been raised, hence they have been appointed on the basis of F.A./F.Sc Certificate, which said factor cannot be made a ground for their upgradation to BPS-14/15.
- e) That the said act of the respondent department is not merely illegal as well as unlawful, but is also against the very clear Articles of Constitution of

Islamic Republic of Pakistan as engraved in the basic rights of said constitution.

- f) That the appellant has got every right to be treated equally with his other colleagues and closing all the ways of upgradation/promotion for the appellant is against all the norms of justice as it has been done in the above mentioned notification dated 13.11.2012.
- g) That it will be pertinent to bring into the notice of this Honourable Tribunal that the above said benefit has also been extended to the Clerk's community, whereby the clerk's even with the Matric Certificate have been upgraded from BPS-09 to BPS-16 and similarly according to other notification dated 24th April, 2012 the Federal Government has been pleased to upgrade the PST Teachers from BPS-09 to BPS-14 including the Matriculate Teachers. (Copies of the above said both the notifications are attached herewith as Annexure-'C' & 'C/1').

It is, therefore, prayed that on acceptance of this Service Appeal the respondents may please be directed to set-aside the term of

"having qualification prescribed for initial recruitment of primary school teachers"

and the appellants may please be considered equally for the above said promotion/upgradation with the other colleagues, whom have been appointed on F.A./F.Sc basis and the above said conditions being illegal unlawful, unconstitutional and discriminatory may please be deleted from the conditions of promotion of the PST teachers to the BPS-14/15.

Any other remedy to which appellant is found entitled, in the peculiar circumstance of the case may also be granted.



Appellant

Through



Ghulam Nabi
Advocate, Peshawar

BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

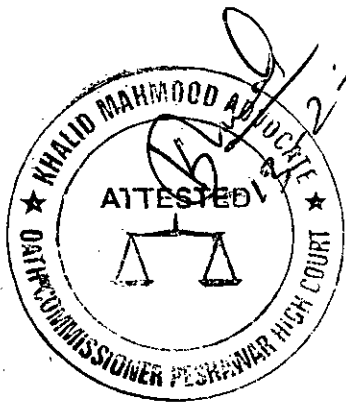

Service Appeal No. _____ / 2013

Azmat Shaheen P S T
G.G.P.S. Abdul Akbar Koroona
District Charsada.

.....Appellant

VersusGovt. of K.P.K., through Secretary Schools & Literacy
Department, Peshawar & others.....RespondentsAFFIDAVIT

I, Ghulam Nabi Advocate, Peshawar as per instructions of my client do hereby solemnly affirm and declare on oath that contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Tribunal.



Deponent

BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

C.M.No. _____ / 2013

In

Service Appeal No. _____ / 2013

Azmat Shaheen P S T
G.G.P.S. Abdul Akbar Koroona
District Charsada.

.....Appellant

Versus

Govt. of K.P.K., through Secretary
Elementary & Secondary Education,
Peshawar & others

.....Respondents

Application for temporary injunction to the effect that respondent may kindly be restrained from taking any action for the promotion of PSTs to BPS-14/15 as according to the procedure mentioned in the impugned rules/notification dated 13.11.2012

Respectfully Sheweth:

1. That the appellant has filed the above titled service appeal before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That respondent vide notification dated 13.11.2012 with regard to the fresh education policy has promulgated a new method of promotion which has violated the

promotion right of thousands of teachers including the appellant

3. That the applicant/appellant has very prima facie cause of action and is very hopeful for its ultimate success of his appeal.
4. That all the three ingredients i.e. prima facie case, balance of convenience and irreparable loss as per spirit of the rule for granting injunction is in favour of the applicant/appellant are present in the said appeal.
5. That in case the injunction as prayed for above is denied, the applicant/appellant will suffer with irreparable loss as the impugned vacancies will be fill up and there would be no chance for appellant accommodation. Therefore, it is in the interest of justice to stay further proceedings on the impugned notification till the final decision of this Honourable Tribunal.
6. That there is no legal bar in granting the injunction as prayed for above.
7. That the facts and grounds taken in the memo of appeal may kindly be considered as part and parcel of the instant application.

It is, therefore, humbly prayed that in the light of the above said submissions this Honourable Tribunal may please be kind enough to restrained the concerned respondents from taking any action in promoting the PSTs teachers on the basis of the above noted notification, thereby depriving the appellants from the right of promotion.

[Signature]
Appellant

Through

[Signature]
Ghulam Nabi
Advocate, Peshawar

AFFIDAVIT

I, Ghulam Nabi Advocate, Peshawar as per instructions of my client do hereby solemnly affirm and declare on oath that contents of the above application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Tribunal.



[Signature]
Deponent

Better Copy

Government of NWFP
Finance Department
No. SO (FR) 10-22(B)/2005
Dated: 01.10.2007

A
14

To

The Secretary to Govt. of NWFP,
Schools & Literacy Department.

Subject: UPGRDATION OF VARIOUS POSTS OF TEACHING/
CAREER STRUCTURE IN SCHOOLS AND LITERACY
DEPARTMENT GOVERNMENT OF NWFP.

Sir,

I am directed to refer to your letter No. SO(G)104/2007 dated 01.10.2007 on the subject noted above and to inform that the Chief Minister NWFP has been pleased to upgraded various posts of teachers in Schools and Literacy Department NWFP as per details given below in respect of those incumbents mentioned against each with immediate effect.

S.No	Designation/ existing Pay Scale	Qualification	Revised Pay Scale
1	Primary School Teacher PST BPS-09	F.A / FSc at lest 2 nd Division with PTC/ Diploma in Education	09
2	PST with requisite experience renamed as Head Teacher/ head Mistress of Rpmay School BPS-07	On the basis of 10 years service experience as Primary School Teacher in BPS-09	12
3	C.T BPS-09	B.A . BSc at least 2 nd Division with Diploma in Education/CT	15
4	AWICT Technical Industrial Arts/ Home Economics BPS-09	B.A/ BSc at lest 2 nd Division with Diploma in Education/ Certificate from Directorate of Curriclum and Teachers Education NWFP Abbottabad in Agro Tech/ Indsutrial Arts Home Economics.	15
5	D.M BPS-09	B.A/ B.Sc at least 2 nd Division with Drawing Master Course.	15
6.	PET BPS-09	B.A/ BSC at least 2 nd Division with JDPE.	15

21/10
/

	Qari/Qaria BPS-07	Hafiz-e-quran with SSC at least 2 nd Division and Sand in Qirat.	12
8.	SST/SST Teacher/Agri with requisite experience re name Sr. SST/Sr. SST Teacher/Sr. SST Agri BPS-16	M.A./M.Sc at least 2 nd Division with B.Ed. M.Ed/M.A. Education equivalent qualification	17
9.	DPE BPS-16	M.Sc. at least 2 nd division in (HPE)	17

2. The promotion/direct Promotion against the upgraded posts shall be made as per laid down procedure and in accordance with the Service Rules to be framed pursuant to the relevant provisions of NWFP Civil Servants (appointments, Promotion and Transfer) 1989 read with the NWFP Civil Servants Act, 1973 in the light of the meeting held on 26.09.2007 of the committee constituted vide Schools & Literacy Department Notification No. SO(G)S&L/1-4/2007 dated 01.08.2007.

Audit copy may please be prepared and sent to the Department for authentication/signature.

Section Officer (FR)

Endst of even No. & date.

Copy for information & necessary action to:-

1. Accountant General NWFP.
2. Director Schools & Literacy NWFP, Peshawar.
3. Director of Education FATA NWFP, Peshawar.
4. PSO to Chief Minister NWFP.
5. PSO to Chief Secretary NWFP.
6. PS to Secretary Finance Department NWFP.
7. All District/agency Accounts Officers in NWFP.

Attes " copy
SHEIK " AMMAD
AUK: " Court Pak,

Aud

" B " 15

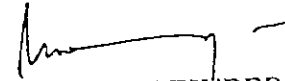
GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.



NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO(PE)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, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.


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

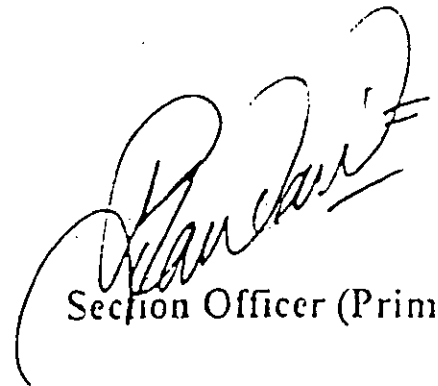
Endst. No. & Date as above.

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.

16

Director Curriculum & Teachers Education Abbottabad.
Director (PITE) Khyber Pakhtunkhwa Peshawar.
Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
Deputy Director Database(EMIS) E&SE Department.
District Coordination Officers in Khyber Pakhtunkhwa.
Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
Agency Education Officers FATA.
Governor, Khyber Pakhtunkhwa.
Chief Minister, Khyber Pakhtunkhwa.
Chief Secretary, Khyber Pakhtunkhwa.
Minister E&SE Khyber Pakhtunkhwa Peshawar.
Secretary E&SE Department.
File.


Section Officer (Primary)

(17)

APPENDIX

enclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
2.	3.	4.	5.
Secondary School Teacher BPS 10.	(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;

Handwritten signature

Handwritten initials

18

			<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(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</p> <p>(b) fifty per cent by initial recruitment.</p>
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.
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.
Senior Certified Teacher (SCT) (General) -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).

Handwritten initials or signature.

<p>Certified Teacher Industrial Arts) 16).</p>		<p>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).</p>
<p>Senior Certified Teacher Agriculture) BPS 16).</p>		<p>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).</p>
<p>Senior Drawing Master BPS 16).</p>		<p>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.</p>
<p>Senior Certified Teacher Home Economics) SCT BPS 16).</p>		<p>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).</p>
<p>Senior Physical Education Teacher (BPS-16).</p>		<p>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.</p>

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

Certified Teacher
(Industrial Arts)
RPS 15)

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

(Handwritten mark)

Certified Teacher
Agriculture)
B.A.

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.

- (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

(Handwritten signature)

CEA (Home Economics)
BPS 15)

	<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).</p>		<p>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).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>Teacher (Home Economics)</p>	<p>(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</p> <p>(ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or</p> <p>(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</p> <p>(iv) Bachelor's Degree, from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):</p> <p>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</p>

24

University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).

Certified Teacher (Home Economics).

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

Bachelor's Degree from a recognized University one year Drawing Master (DM) course

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.

Handwritten signature or initials.

<p>Physical Education (BPS-15).</p>	<p>Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.</p>	<p>18 to 35 years.</p>	<p>(a) Eighty per cent by initial recruitment; 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.</p> <p>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.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
<p>Primary School Head (PSHT) i).</p>			<p>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.</p>
<p>Semi-Primary School (BPS-14).</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers</p>

[Handwritten signature]

				with at least five years service as such having qualification prescribed for recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	<p>(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or</p> <p>(ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.</p>	18 to 35 years.	By initial recruitment on merit at Union C level: provided that if no suitable candidate within the Union Council is available, then 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.

SCHEDULE

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

Arabic Teacher

<u>Educational Qualification</u>	<u>Total Marks: 100</u>
SSC	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
M.A Arabic / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimiatul 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

<u>Category of Qualification</u>	<u>Total Marks 100</u>
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 = ____
M.A Islamiat / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimiatul Wafaqul Madaris	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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

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 FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
CT Certificate/ Diploma in Education /ADE.	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

Drawing Master

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

Physical Education Teacher

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

30

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 FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 10 / total marks = ____	
B.A/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 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. Deri Asnad from recognized Tazeemat-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.

Islamabad, the 24th April 2012

OFFICE ORDER

In continuation of Federal Directorate of Education's office order of even number dated 18.05.2011, consequent upon one time waiver in the conditions of qualification/experience granted by the Prime Minister vide U. O. No. 3759/PSPM/2012 dated 24.02.2012, as conveyed by the Capital Administration & Development Division vide No.F.4-23/2011-(Education) dated 23.04.2012 and on the recommendations of Departmental Promotion Committee meeting held on 24.04.2012, the following Matric Trained Teachers (BS-09) are promoted to the upgraded post of Elementary School Teacher (BS-14) w.e.f. 01.01.2011:

S.#	NAME	DATE OF BIRTH	INSTITUTION
1	ZAINAB BIBI	01.02.1953	IMS (I-V) G-6.1/2, IBD.
2	RUKHSANA JABEEN	08.12.1954	IMSG.G-6-7/4, IBD.
3	RIFAT RAANA	01.07.1953	IMSG (I-X).DHOKE GANGAL
4	KAUSAR PARVEEN	04.04.1954	IMSG (I-X). DHOKE GANGAL
5	ABIDA PARVEEN	22.10.1955	IMS (I-V). HOON DHAMIAL
6	FUKHRAJ BEGUM	01.07.1956	IMSG (I-X). DHOKE GANGAL
7	SAJIDA BIBI	05.02.1956	IMSG (I-X), G-9/1, IBD
8	GHULAM FIZA	30.03.1954	IMS (I-V) No.2, G-6/1
9	FARHANDA MASOOD	13.05.1953	IMSG (I-V).HOON DHAMIAL
10	SAEEDA KHATOON	15.08.1953	IMSG (I-X). I-10/4, IBD.
11	GHULAM SAKINA	13.04.1954	IMSG (I-V).DHOKE HASHU (FA)
12	NAJMA BIBI	22.06.1953	IMSG (I-V) G-6/4, IBD
13	AMINA BEGUM	23.07.1953	IMS (I-V). KOT HATHIAL
14	KHURSHID AKHTAR	15.05.1952	IMS (I-V). PIND PARACHA
15	KAUSAR SULTANA	02.01.1956	IMS (I-V).G-7. 3/1,IBD.
16	SURRAYYA BANO	02.06.1954	IMS (I-V). NO.5, G-10/2 IBD.
17	MASOODA AZIZ	06.06.1954	IMS (I-V). BOOKA BANGIAL
18	GULFOOZ AKHTAR	14.08.1953	IMS (I-V). UPPRA GHORA
19	GUL-E-NASREEN	04.12.1953	IMSG (I-X). SANG JANI (FA)
20	SHAMSHAD BEGUM	02.09.1954	IMSG (I-VIII).S. F-7.4, IBD.
21	PARVEEN AKHTAR	01.08.1956	IMSG (I-VIII) No.49, I-10/1
22	RUKHSANA TANVEER	14.05.1953	IMSG (I-V). MOHRI MUGHAL (FA)
23	ZAHIDA PARVEEN	03.02.1957	IMSG (I-V). MOHRI MUGHAL (FA)
24	SHAGUFTA SHAHEEN	02.06.1956	IMSG (I-X). UNIVERSITY COLONY
25	NASIM AKHTAR	15.02.1954	IMS (I-V) No. 3, E-3
26	NAJMA YASMEEN	11.10.1955	IMS (I-V). NO.3, IBD.
27	RASHIDA YASMEEN	01.04.1955	IMS (I-V). G-7.1, IBD.
28	RUKHSANA TARIQ	03.09.1955	IMS (I-V).NO.49, I-10/1, IBD
29	SHAHIDA PARVEEN	01.01.1956	IMS (I-V). KOT HATHIAL (FA)
30	SYEDA NASREEN AKHTAR	20.08.1959	IMS (I-V).NO.40, I-10/1
31	SAMIA HANAN	16.12.1959	IMS (I-V).G-7. 3/1, IBD
32	SABIRA ASHFAQ KAZMI	19.12.1953	IMSG (I-X).PIND PARCHA (FA)
33	FARHA BEGUM	13.02.1957	IMS (I-V).G-7.1,IBD.
34	NASIM AKHTAR	05.01.1957	IMS (I-V).NO.49, IBD.
35	BUSHRA KHANUM	15.10.1952	IMS (I-V).G-6.1-2, IBD.
36	JOSPHIN YOUNIS	04.01.1953	IMS (I-V) No.7,G-7/3-3
37	AZMAT UN NISA	16.10.1953	IMSG (I-V). DHALIALLA (FA)
38	SAFIA SULTANA	10.05.1959	IMS (I-X). G-8.4, IBD.
39	MUNAZA GUL	20.05.1955	IMS (I-V).PIND SIHALA (FA)
40	GHAZALA YASMEEN	15.04.1958	IMS (I-X). NOOKPUR SHAFAN (FA)
41	RAZIA ZAMAN	16.12.1959	IMS (I-V).G-7.2, IBD.
42	RUKHSANA YASMEEN	02.05.1962	FIMS (I-V).NO.36, IBD.

[Handwritten Signature]

Principal
I.M. 3 for Girls (I-X)
Sara Syedan (FA) Islamabad

5-397
4-556

	R BASHIR	24.2.1974	IMS (I-V), G-8/1
	ANNA KATISAR	6.6.1975	IMSG (I-X), NOORPUR SHAH.
	UMA BIBI	14.5.1985	IMS (I-V) G-6/2
	SUMAIRA CHOHAN	18.4.1984	IMS (I-V), G-11/1
	SADIA HAYAT	28.12.1983	IMSG (I-X), Pungran
588	AMPIAZ AKBA	3.7.1979	IMSG (I-X), P.E. G-5
589	GHULAM SUGHRA	03-07.1975	IMSG (I-X), PIND MALKAN
590	RASHIDA PARVEEN	2.5.1986	IMSG (I-X), CHAKSHEHZAD
591	OUDSIA RAJAB TUNJO	1.1.1981	IMSG (I-V), DHOK JERANI
592	TAHIRA JABEEN	14.01.1984	IMSG (I-V) PIND BEGWAL
593	NAZIA NARGIS	13.8.1971	IMSG (I-X), BADAI QADIR BAKHSH
594	FARZANA NASRULLAH KHAN	01.04.1974	IMSG (I-X) JAGIOT (FA)
595	GHULAM FATIMA	17.04.1974	IMSG (I-V) Severa
596	UZMA KHAN	14.10.1976	IMS (I-V) G-7/4
597	MUSSARAT SHAHEEN	06.08.1985	IMSG (I-X) GAGRI
598	ZAIB UN NISA	05.04.1982	IMSG (I-V) Kot Hatyal
599	TASLEEM AKHTAR	04.04.1959	IMSG (I-V), MOHRIAN (FA)
600	ASMA ASHFAQ	18.03.1981	IMS (I-V) E-7/4
601	BUSHRA AZIZ	12.07.1974	IMSG, Pind Pracha (FA)
602	SHAISTA BIBI	10.11.1975	IMSG (I-X) Dhoke Gangal
603	SHEEDA NAZ	02.03.1984	IMSG (I-X) Humak
604	FOZIA SIDDIQUE	01.01.1973	IMSG (I-X) Humak
605	MUKHTIAR BEGUM	01.04.1976	IMSG (I-V) Peija
606	SAMINA SALEEM AWAN		IMSG (I-V) Peija

2. The teachers working on deputation to other Departments from FDE will be considered for promotion on joining their parent department i.e. FDE.

3. The seniority of EST (BS-14) will be determined as per Civil Servants (Seniority) Rules, 1923.

4. This issues with the approval of Director General, FDE.

(Dr. Syed Tajammul-Hussain Shah)
Director Schools (Female)

Distribution:

- i. AGPR, Islamabad
- ii. PS to Secretary, CA&DD
- iii. PA to Joint Educational Advisor, CA&DD
- iv. PS to DG, FDE
- v. Director (A&C), FDE
- vi. All AEO's
- vii. All Heads of Institution
- viii. Teachers concerned
- ix. Personal Files

(Riasat Ali)

Administrative Officer (Female)

Principal
I.M.S for Girls (I-X)
Syedan (F.A) Islamabad

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUN KHWA, PESHAWAR**

Notification

Consequent upon the approval of the departmental promotion committee (DPC) meeting held on 07/08/2012, the following assistants/stenographers of Elementary & Secondary Education Department are hereby promoted/adjusted as regular superintendents/budget & Accounts Officers (B-16) in the interest of Public Service with immediate effect. C-1

S/No	Name & Designation	From	Promoted as	Remarks
1	Almas Khan Stenographer	Directorate E&SE, Khyber Pakhtun Khwa	Supdt: Estt: Directorate E&SE, K/Pakhtun Kha	Already Occupied
2	Sher Malik Assistant	AEO Mohammad	Services Placed at the disposal of DE (FATA) Peshawar for further.	
3	Mohammad Ashiq Assistant	EDO (E&SE) Abbotta Abad	EDO (E&SE) Batagraam	Against Vacant Supdt post B-16
4	Amanullah Assistant	EDO (E&SE) Tank	EDO (E&SE) Hangu	Against Vacant Supdt post B-16
5	Mohammad Ilyas Assistant	EDO (E&SE) Haripur	EDO (E&SE) Kohistan	Against Vacant Supdt post B-16
6	Nauman Ud Din Assistant	RITE (F) Bannu	EDO (E&SE) Hangu	Against Vacant Supdt post B-16
7	Altaf Hussain Assistant	EDO (E&SE) Abbotta Abad	EDO (E&SE) Battagraam	Against Vacant Supdt post B-16
8	Muhammad Ismail Assistant	RITE (F) D.I. Khan	EDO (E&SE) Karak	Against Vacant Supdt post B-16
9	Ibrahim Assistant	EDO (E&SE) Nowshera	DDO (F) Dir Upper	Against Vacant Supdt post B-16
10	Abdul Tamim Assistant	Directorate (E&SE) Khyber Pakhtun Khwa	DDO (M) Buner	Against Vacant Supdt post B-16
11	Saidul Israr Assistant	RITE (MO Thana)	EDO (E&SE) Swat	Against Vacant Supdt post B-16
12	Khadim Shah Assistant	EDO (E&SE) Charsadda	DDO (F) Timargara	Against Vacant Supdt post B-16
13	Sanaullah Assistant	DDO (F) Swabi	EDO (E&SE) Swat.	Against Vacant Supdt post B-16
14	Habib Aslam Assistant	EDO (E&SE) Mardan	EDO (E&SE) Kohistan	Against Vacant Supdt post B-16
15	Rahim Khan Assistant	EDO (E&SE) Swat	EDO (E&SE) Swat	Against Vacant Supdt post B-16
16	Jamshed Khan	EDO (E&SE) Swat	DDO (M) Timargara	Against Vacant Supdt post B-16

31

17	Sheikh AmanUllah	EDO (E&SE) D.I Khan	EDO (E&SE) D.I Khan	Against Vacant Supdt post B-16
18	Irshad Muhammad	EDO (E&SE) Swat	EDO (E&SE) Dir Upper	Against Vacant Supdt post B-16
19	Abdul Wadood	EDO (E&SE) Chitral	EDO (E&SE) Chitral	Against Vacant Supdt post B-16
20	Abdul Wadood	EDO (E&SE) Swat	EDO (E&SE) Karak	Against Vacant Supdt post B-16
21	Zubair Muhammad	EDO (E&SE) Swat	EDO (E&SE) Shangla	Against Vacant Supdt post B-16
22	Mukamil Khan	Directorate (E&SE) K/Pakhtun Khwa	DDO (M) Wari Dir	Against Vacant Supdt post B-16
23	Shamsur Rahman	Directorate (E&SE) K/Pakhtun Khwa	EDO (E&SE) Kohat	Against Vacant Supdt post B-16

Note

1. Charge report should be submitted to all concerned.

(Muhammad Rafiq Khattak)
DIRECTO

Endst: No. 612.52/A.23/MS/Promoted/Adjuste/2012, detail Peshawar the 02/08/2012 copy of the above forwarded to the:

1. PS to Minister for Elementary & Secondary Education Department K/Pakhtun Khwa.
2. PS to Secretary Govt of Khyber Pakhtun Khwa Elementary & Secondary Education Department.
3. Director Curriculum & Teachers Education Khyber Pakhtun Khwa Abbatta Abad.
4. Director of Education (FATA) Peshawar.
5. Director Provincial Institute of Teachers Educ: Khyber Pakhtun Khwa Peshawar.
6. Accountant General Khyber Pakhtun Khwa Peshawar.
7. District Accounts Officers Concerned:
8. Agency Accounts Officers Concerned:
9. Executive District Officers (E&SE) Concerned.
10. Agency Education Officers Concerned.
11. Deputy District Officer (E&SE) Concerned.
12. Superintendents Concerned.
13. PA to Director Elementary & secondary Edu: Khyber Pakhtun Khwa Peshawar.
14. PA to Additional Director (Estt) & (Dey) local office.
15. Master file.

Deputy Directory (E&SE)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No: 390/2013

Mst: Azamt Shaheen PST GGPS Abdul Akbar Koroona District charsadda
...Appellant

VERSUS

Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar &
others -----Respondents

PARAWISE COMMENTS FOR AND ON BEHALF OF THE RESPONDENTS 1 to 4.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary objections

- 1 That the appellant has no cause of action/locus standi.
- 2 That the appellant has not come to this Hon! able Tribunal with clean hands.
- 3 That the appellant has concealed the material facts from this Hon! able Tribunal, hence liable to be dismissed.
- 4 That this Hon! able Tribunal has got no jurisdiction to entertain the instant appeal.
- 5 That the instant appeal is not maintainable in its present form.
- 6 That the instant appeal is badly time barred.
- 7 That the appellant is not entitled for the grant of up-gradation to BPS-15.
- 8 That the present appeal is against the relevant rules & policy.
- 9 That the instant appeal is bad for misjoinder & non joinder of the necessary parties.
- 10 That the appellant has been treated as per rules & policy.
- 11 That the appellant is estopped by her own conduct to file the present appeal before this Hon! able Tribunal.
- 12 That the preset appeal is not maintainable in its present form.

ON FACTS

- 1 That the Para-I needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 is also needs no comments being pertains to the appellant.
- 3 That Para-3 is incorrect & misleading, the factual position with regard to the plea of the appellant regarding the appointment against PST post with qualification of SSC with the PTC certificate from the recognized Institution remains that the said policy was for the purpose of initial appointment against the said post whereas, the appellant is seeking his

up-gradation from BPS-12 to 14/15 having different criteria of seniority cum fitness from amongst PST with at least 10-years service as such having qualification of FA/F. Sc along-with other relevant prescribed qualification from the recognized Institutions. The appellant could not qualify the said criteria for up gradation against PST post in BPS-14 /15, hence she could not be upgraded in the light of the mandatory provisions of the current policy for the PST post.

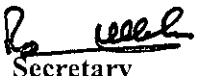
- 4 That Para-4 is incorrect & misleading on the grounds that the appellant lacks the prescribed qualification for up-gradation against the said post in BPS-14/15 as she has herself admitted that the prescribed qualification for said post has been enhanced from SSC to HSSC, hence she is not entitled for the grant of up gradation in BPS-14/15 in the presence of the current policy of the Provincial Government. (Annex A).
- 5 That Para-5 is incorrect & denied, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 6 That Para-6 is incorrect, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 7 That Para-7 is incorrect & misleading, the appellant has been treated as per prevailing policy regarding up gradation from BPS-12 to 14/15 on the basis of facts & circumstances of the case of the appellant as mentioned in Para-3 & 4.
- 8 That Para-8 is incorrect & denied, the respondents have acted as per current policy for up gradation against the PST post from BPS-12 to 14/ 15 wherein, the appellant could not qualify / meet the set criteria & qualification for the said purpose, hence could not be upgraded against the said post by the respondents.
- 9 That Para-9 is correct, detail reply/grounds regarding her in-eligibility for upgradation against PST post in BPS-14/15 have been mentioned in Par-3 & 4, hence no comments..
- 10 That Para-10 is also incorrect & denied, reply of this Para has already been given in the above mentioned Para-3 &4, hence no further comments.
- 11 That Para-11 is incorrect & denied, the appellant is not entitled for the grant of up-gradation against the PST post under the criteria of the current policy.
- 12 That Para-12 is incorrect & denied, the appeal of the appellant is not maintainable under Section-3 & 4 of the Service Tribunal Act 1974.
- 13 That Para-13 needs no comments being legal, however, the respondents submit on the following grounds inter alia :-


ON GROUNDS


- A That ground-A is incorrect & misleading, the appellant has correctly been treated as per law, rules & policy in the instant case.
- B That ground-B is also incorrect & denied, the appellant has been treated as per law & current up-gradation policy & found not eligible for up-gradation against the PST post from BPS-12 to 14/15, according to the current policy.
- C That Ground-C is also incorrect & denied, detail reply regarding the eligibility of the appellant for up gradation was her basic qualification, which resulted her rejection against up gradation against PST post in BPS-14/15.
- D That ground-D is incorrect & misleading, detail reply of this ground has been given in the above mentioned paras, hence no comments.


- E That ground-E is also incorrect & misleading as the act of the respondents is within legal parameter in the light of the criteria of the current policy of up gradation.
- F That ground-F is incorrect & denied, the appellant has been treated as per law, rules & policy in the instant case and found not eligible for up gradation against the said post as mentioned in the above paras.
- G That Ground-G is incorrect & denied, each & every cadre has its own criteria & qualification for up gradations whereas the present cadre is totally different from the other teaching cadres/post & the appellant could not qualify the criteria for up-gradation, hence she has been rejected on the grounds as mentioned in para-3 & 4.

In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the respondent Department.


Secretary
Finance Department Khyber
Pakhtunkhwa, Peshawar


Secretary
(Estab.) Department Khyber
Pakhtunkhwa, Peshawar


Director
E&SE Khyber Pakhtunkhwa,
Peshawar.


Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No: 390/2013

Mst: Azamt Shaheen PST GGPS Abdul Akbar Koroona District charsadda
...Appellant

VERSUS

Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar &
others -----Respondents

PARAWISE COMMENTS FOR AND ON BEHALF OF THE RESPONDENTS 1 to 4.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary objections

- 1 That the appellant has no cause of action/locus standi.
- 2 That the appellant has not come to this Hon! able Tribunal with clean hands.
- 3 That the appellant has concealed the material facts from this Hon! able Tribunal, hence liable to be dismissed.
- 4 That this Hon! able Tribunal has got no jurisdiction to entertain the instant appeal.
- 5 That the instant appeal is not maintainable in its present form.
- 6 That the instant appeal is badly time barred.
- 7 That the appellant is not entitled for the grant of up-gradation to BPS-15.
- 8 That the present appeal is against the relevant rules & policy.
- 9 That the instant appeal is bad for misjoinder & non joinder of the necessary parties.
- 10 That the appellant has been treated as per rules & policy.
- 11 That the appellant is estopped by her own conduct to file the present appeal before this Hon! able Tribunal.
- 12 That the preset appeal is not maintainable in its present form.

ON FACTS

- 1 That the Para-I needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 is also needs no comments being pertains to the appellant.
- 3 That Para-3 is incorrect & misleading, the factual position with regard to the plea of the appellant regarding the appointment against PST post with qualification of SSC with the PTC certificate from the recognized Institution remains that the said policy was for the purpose of initial appointment against the said post whereas, the appellant is seeking his

up-gradation from BPS-12 to 14/15 having different criteria of seniority cum fitness from amongst PST with at least 10-years service as such having qualification of FA/F. Sc along-with other relevant prescribed qualification from the recognized Institutions. The appellant could not qualify the said criteria for up gradation against PST post in BPS-14 /15, hence she could not be upgraded in the light of the mandatory provisions of the current policy for the PST post.


- 4 That Para-4 is incorrect & misleading on the grounds that the appellant lacks the prescribed qualification for up-gradation against the said post in BPS-14/15 as she has herself admitted that the prescribed qualification for said post has been enhanced from SSC to HSSC, hence she is not entitled for the grant of up gradation in BPS-14/15 in the presence of the current policy of the Provincial Government. (Annex A).
- 5 That Para-5 is incorrect & denied, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 6 That Para-6 is incorrect, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 7 That Para-7 is incorrect & misleading, the appellant has been treated as per prevailing policy regarding up gradation from BPS-12 to 14/15 on the basis of facts & circumstances of the case of the appellant as mentioned in Para-3 & 4.
- 8 That Para-8 is incorrect & denied, the respondents have acted as per current policy for up gradation against the PST post from BPS-12 to 14/ 15 wherein, the appellant could not qualify / meet the set criteria & qualification for the said purpose, hence could not be upgraded against the said post by the respondents.
- 9 That Para-9 is correct, detail reply/grounds regarding her in-eligibility for upgradation against PST post in BPS-14/15 have been mentioned in Par-3 & 4, hence no comments.
- 10 That Para-10 is also incorrect & denied, reply of this Para has already been given in the above mentioned Para-3 &4, hence no further comments.
- 11 That Para-11 is incorrect & denied, the appellant is not entitled for the grant of up-gradation against the PST post under the criteria of the current policy.
- 12 That Para-12 is incorrect & denied, the appeal of the appellant is not maintainable under Section-3 & 4 of the Service Tribunal Act 1974.
- 13 That Para-13 needs no comments being legal, however, the respondents submit on the following grounds inter alia :-

ON GROUNDS


- A That ground-A is incorrect & misleading, the appellant has correctly been treated as per law, rules & policy in the instant case.
- B That ground-B is also incorrect & denied, the appellant has been treated as per law & current up-gradation policy & found not eligible for up-gradation against the PST post from BPS-12 to 14/15, according to the current policy.
- C That Ground-C is also incorrect & denied, detail reply regarding the eligibility of the appellant for up gradation was her basic qualification, which resulted her rejection against up gradation against PST post in BPS-14/15.
- D That ground-D is incorrect & misleading, detail reply of this ground has been given in the above mentioned paras, hence no comments.


- E That ground-E is also incorrect & misleading as the act of the respondents is within legal parameter in the light of the criteria of the current policy of up gradation.
- F That ground-F is incorrect & denied, the appellant has been treated as per law, rules & policy in the instant case and found not eligible for up gradation against the said post as mentioned in the above paras.
- G That Ground-G is incorrect & denied, each & every cadre has its own criteria & qualification for up gradations whereas the present cadre is totally different from the other teaching cadres/post & the appellant could not qualify the criteria for up-gradation, hence she has been rejected on the grounds as mentioned in para-3 & 4.

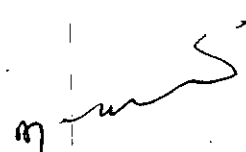
In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the respondent Department.


Secretary

Finance Department Khyber
Pakhtunkhwa, Peshawar


Secretary
(Estab:) Department Khyber
Pakhtunkhwa, Peshawar


Director
E&SE Khyber Pakhtunkhwa,
Peshawar.


Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No: 390/2013

**Mst: Azamt Shaheen PST GGPS Abdul Akbar Koroona District charsadda
...Appellant**

VERSUS

Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar &
others -----Respondents

PARAWISE COMMENTS FOR AND ON BEHALF OF THE RESPONDENTS 1 to 4.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary objections

- 1 That the appellant has no cause of action/locus standi.
- 2 That the appellant has not come to this Hon! able Tribunal with clean hands.
- 3 That the appellant has concealed the material facts from this Hon! able Tribunal, hence liable to be dismissed.
- 4 That this Hon! able Tribunal has got no jurisdiction to entertain the instant appeal.
- 5 That the instant appeal is not maintainable in its present form.
- 6 That the instant appeal is badly time barred.
- 7 That the appellant is not entitled for the grant of up-gradation to BPS-15.
- 8 That the present appeal is against the relevant rules & policy.
- 9 That the instant appeal is bad for misjoinder & non joinder of the necessary parties.
- 10 That the appellant has been treated as per rules & policy.
- 11 That the appellant is estopped by her own conduct to file the present appeal before this Hon! able Tribunal.
- 12 That the preset appeal is not maintainable in its present form.

ON FACTS

- 1 That the Para-I needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 is also needs no comments being pertains to the appellant.
- 3 That Para-3 is incorrect & misleading, the factual position with regard to the plea of the appellant regarding the appointment against PST post with qualification of SSC with the PTC certificate from the recognized Institution remains that the said policy was for the purpose of initial appointment against the said post whereas, the appellant is seeking his

up-gradation from BPS-12 to 14/15 having different criteria of seniority cum fitness from amongst PST with at least 10-years service as such having qualification of FA/F. Sc along-with other relevant prescribed qualification from the recognized Institutions. The appellant could not qualify the said criteria for up gradation against PST post in BPS-14 /15, hence she could not be upgraded in the light of the mandatory provisions of the current policy for the PST post.


- 4 That Para-4 is incorrect & misleading on the grounds that the appellant lacks the prescribed qualification for up-gradation against the said post in BPS-14/15 as she has herself admitted that the prescribed qualification for said post has been enhanced from SSC to HSSC, hence she is not entitled for the grant of up gradation in BPS-14/15 in the presence of the current policy of the Provincial Government. (Annex A).
- 5 That Para-5 is incorrect & denied, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 6 That Para-6 is incorrect, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 7 That Para-7 is incorrect & misleading, the appellant has been treated as per prevailing policy regarding up gradation from BPS-12 to 14/15 on the basis of facts & circumstances of the case of the appellant as mentioned in Para-3 & 4.
- 8 That Para-8 is incorrect & denied, the respondents have acted as per current policy for up gradation against the PST post from BPS-12 to 14/ 15 wherein, the appellant could not qualify / meet the set criteria & qualification for the said purpose, hence could not be upgraded against the said post by the respondents.
- 9 That Para-9 is correct, detail reply/grounds regarding her ineligibility for upgradation against PST post in BPS-14/15 have been mentioned in Par-3 & 4, hence no comments.
- 10 That Para-10 is also incorrect & denied, reply of this Para has already been given in the above mentioned Para-3 &4, hence no further comments.
- 11 That Para-11 is incorrect & denied, the appellant is not entitled for the grant of up-gradation against the PST post under the criteria of the current policy.
- 12 That Para-12 is incorrect & denied, the appeal of the appellant is not maintainable under Section-3 & 4 of the Service Tribunal Act 1974.
- 13 That Para-13 needs no comments being legal, however, the respondents submit on the following grounds inter alia :-

ON GROUNDS

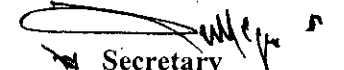
- A That ground-A is incorrect & misleading, the appellant has correctly been treated as per law, rules & policy in the instant case.
- B That ground-B is also incorrect & denied, the appellant has been treated as per law & current up-gradation policy & found not eligible for up-gradation against the PST post from BPS-12 to 14/15, according to the current policy.
- C That Ground-C is also incorrect & denied, detail reply regarding the eligibility of the appellant for up gradation was her basic qualification, which resulted her rejection against up gradation against PST post in BPS-14/15.
- D That ground-D is incorrect & misleading, detail reply of this ground has been given in the above mentioned paras, hence no comments.


- E That ground-E is also incorrect & misleading as the act of the respondents is within legal parameter in the light of the criteria of the current policy of up gradation.
- F That ground-F is incorrect & denied, the appellant has been treated as per law, rules & policy in the instant case and found not eligible for up gradation against the said post as mentioned in the above paras.
- G That Ground-G is incorrect & denied, each & every cadre has its own criteria & qualification for up gradations whereas the present cadre is totally different from the other teaching cadres/post & the appellant could not qualify the criteria for up-gradation, hence she has been rejected on the grounds as mentioned in para-3 & 4.

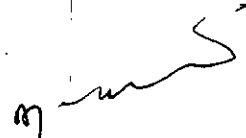
In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the respondent Department.


Secretary

Finance Department Khyber
Pakhtunkhwa, Peshawar


Secretary
(Estab:) Department Khyber
Pakhtunkhwa, Peshawar


Director
E&SE Khyber Pakhtunkhwa,
Peshawar.


Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No: 390/2013

**Mst: Azamt Shaheen PST GGPS Abdul Akbar Koroona District charsadda
...Appellant**

VERSUS

Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar &
others -----Respondents

PARAWISE COMMENTS FOR AND ON BEHALF OF THE RESPONDENTS 1 to 4.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary objections

- 1 That the appellant has no cause of action/locus standi.
- 2 That the appellant has not come to this Hon! able Tribunal with clean hands.
- 3 That the appellant has concealed the material facts from this Hon! able Tribunal, hence liable to be dismissed.
- 4 That this Hon! able Tribunal has got no jurisdiction to entertain the instant appeal.
- 5 That the instant appeal is not maintainable in its present form.
- 6 That the instant appeal is badly time barred.
- 7 That the appellant is not entitled for the grant of up-gradation to BPS-15.
- 8 That the present appeal is against the relevant rules & policy.
- 9 That the instant appeal is bad for misjoinder & non joinder of the necessary parties.
- 10 That the appellant has been treated as per rules & policy.
- 11 That the appellant is estopped by her own conduct to file the present appeal before this Hon! able Tribunal.
- 12 That the preset appeal is not maintainable in its present form.

ON FACTS

- 1 That the Para-1 needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 is also needs no comments being pertains to the appellant.
- 3 That Para-3 is incorrect & misleading, the factual position with regard to the plea of the appellant regarding the appointment against PST post with qualification of SSC with the PTC certificate from the recognized Institution remains that the said policy was for the purpose of initial appointment against the said post whereas, the appellant is seeking his

up-gradation from BPS-12 to 14/15 having different criteria of seniority cum fitness from amongst PST with at least 10-years service as such having qualification of FA/F. Sc along-with other relevant prescribed qualification from the recognized Institutions. The appellant could not qualify the said criteria for up gradation against PST post in BPS-14 /15; hence she could not be upgraded in the light of the mandatory provisions of the current policy for the PST post.

- 4 That Para-4 is incorrect & misleading on the grounds that the appellant lacks the prescribed qualification for up-gradation against the said post in BPS-14/15 as she has herself admitted that the prescribed qualification for said post has been enhanced from SSC to HSSC, hence she is not entitled for the grant of up gradation in BPS-14/15 in the presence of the current policy of the Provincial Government. (Annex A).
- 5 That Para-5 is incorrect & denied, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 6 That Para-6 is incorrect, detail reply of this Para has already been given in Par-3 & 4, hence no further comments.
- 7 That Para-7 is incorrect & misleading, the appellant has been treated as per prevailing policy regarding up gradation from BPS-12 to 14/15 on the basis of facts & circumstances of the case of the appellant as mentioned in Para-3 & 4.
- 8 That Para-8 is incorrect & denied, the respondents have acted as per current policy for up gradation against the PST post from BPS-12 to 14/ 15 wherein, the appellant could not qualify / meet the set criteria & qualification for the said purpose, hence could not be upgraded against the said post by the respondents.
- 9 That Para-9 is correct, detail reply/grounds regarding her in-eligibility for upgradation against PST post in BPS-14/15 have been mentioned in Par-3 & 4, hence no comments.
- 10 That Para-10 is also incorrect & denied, reply of this Para has already been given in the above mentioned Para-3 &4, hence no further comments.
- 11 That Para-11 is incorrect & denied, the appellant is not entitled for the grant of up-gradation against the PST post under the criteria of the current policy.
- 12 That Para-12 is incorrect & denied, the appeal of the appellant is not maintainable under Section-3 & 4 of the Service Tribunal Act 1974.
- 13 That Para-13 needs no comments being legal, however, the respondents submit on the following grounds inter alia :-

ON GROUNDS

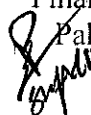
- A That ground-A is incorrect & misleading, the appellant has correctly been treated as per law, rules & policy in the instant case.
- B That ground-B is also incorrect & denied, the appellant has been treated as per law & current up-gradation policy & found not eligible for up-gradation against the PST post from BPS-12 to 14/15, according to the current policy.
- C That Ground-C is also incorrect & denied, detail reply regarding the eligibility of the appellant for up gradation was her basic qualification, which resulted her rejection against up gradation against PST post in BPS-14/15.
- D That ground-D is incorrect & misleading, detail reply of this ground has been given in the above mentioned paras, hence no comments.


- E That ground-E is also incorrect & misleading as the act of the respondents is within legal parameter in the light of the criteria of the current policy of up gradation.
- F That ground-F is incorrect & denied, the appellant has been treated as per law, rules & policy in the instant case and found not eligible for up gradation against the said post as mentioned in the above paras.
- G That Ground-G is incorrect & denied, each & every cadre has its own criteria & qualification for up gradations whereas the present cadre is totally different from the other teaching cadres/post & the appellant could not qualify the criteria for up-gradation, hence she has been rejected on the grounds as mentioned in para-3 & 4.

In view of the above made submissions, it is requested that this Hon! able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the respondent Department.


Secretary

Finance Department Khyber
Pakhtunkhwa, Peshawar

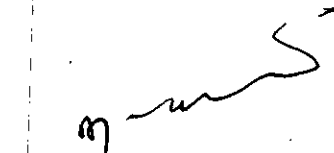



Secretary

(Estab:) Department Khyber
Pakhtunkhwa, Peshawar



Director
E&SE Khyber Pakhtunkhwa,
Peshawar.



Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar