


30.06.2022

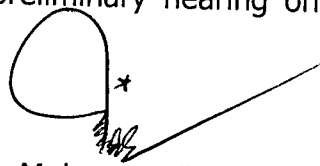
None for the appellant present.

Notices be issued to appellant and his counsel for the date fixed. To come up for preliminary hearing on ~~18.08.2022~~ before S.B.


(Fareeha Paul)
Member (E)

18.08.2022




Junior of learned counsel for the appellant present and requested for adjournment on the ground that senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 12.10.2022 before S.B.


(Mian Muhammad)
Member (E)

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 540 /2022 _____


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/04/2022	<p>The appeal of Mr. Muhammad Saeed resubmitted today by Mr. Asad Mahmood Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	<p><i>Noted</i> <i>[Signature]</i> <i>14/4</i></p>	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>20-4-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
	20.04.2022	<p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant though tried to argue the case but could not make a point pertaining to the connected documents. He therefore, requested for adjournment enabling him to properly assist the court. Adjourned. To come up for preliminary hearing on <u>30.04.2022</u> before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER(E)</p>

The appeal of Mr. Muhammad Saood Qari GHS Shpalkiwal SD Arara Adamkhel Kohat received today i.e. on 23.02.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list not attached with the appeal.
- 2- Memorandum of appeal may be got signed by the appellant.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 5- Copy of impugned order/rules is not attached with the appeal which may be placed on it.
- 6- Copy of departmental appeal against the impugned order/rules is not attached with the appeal which may be placed on it.
- 7- Annexures/documents referred to in the memo of appeal are not attached with the appeal which may be placed on it.
- 8- Wakalat nama in favour of appellant be placed on file.
- 9- Three copies/sets of the appeal along annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 538 /S.T,

Dt. 23-2- /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asad Mehmood Adv. Peshawar.

Copy of total sanctioned posts is required to be annexed with appeal. Request for obtaining copy thereof to respondent's department is already made. Time may kindly be extended.



**BEFORE KHYBER PAKHTUNWA SERVICE TRIBUNAL,
PESHAWAR**

Appeal No. 540 /2022

Muhammad Saood, Qari, Government High School Shpalkiwal SD, Dara
Adamkhel, District Kohat

VERSUS

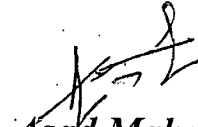
Director (E & SE) KPK, Merged Districts, Education Directorate,
Peshawar and others.

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5.	DEO letter dated 11.08.2021	D	13
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Through


Appellant


Asad Mahmood
Advocate High Court

**BEFORE KHYBER PAKHTUNWA SERVICE TRIBUNAL,
PESHAWAR**

Appeal No. _____ /2022

Muhammad Saood, Qari, Government High School Shpalkiwal SD, Dara Adamkhel, District Kohat

.....
Khyber Pakhtunkhwa
Service Tribunal

APPELLANT

Diary No. 346

Dated 23/2/2022

VERSUS

1. Director (Elementary & Secondary Education) KPK, Merged Districts, Peshawar
2. Assistant Director (Estab), Merged Areas, Education Directorate, Peshawar.
3. District Education Officer (Male), Sub-Division Dara Adam Khel, Kohat.

.....
RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER APPELLANT FOR PROMOTION AGAINST THE VACANT POST OF SST (PHYSICS/MATHS) AND OBSERVE 3% QUOTA RESERVED FOR PROMOTION OF SR. QARI'S/QARI'S TO SST (PHYSICS/MATHS) IN ITS TRUE LETTER AND SPIRIT AND AGAINST THE REJECTION ORDER DATED 26TH JANUARY, 2022 WHEREBY DEPARTMENTAL APPEAL IS REJECTED IN VIOLATION OF LAW AND PROMOTION RULES.

Filed to-day

Registrar

PRAYER:

ON ACCEPTANCE OF THIS APPEAL, THE REJECTION ORDER DATED 26TH JANUARY, 2022 MAY KINDLY BE SET ASIDE AND RESPONDENTS MAY KINDLY BE DIRECTED TO CONSIDER APPELLANT FOR PROMOTION AGAINST THE VACANT POST OF SST (PHYSICS/MATHS) BY OBSERVING 3% SHARE FOR PROMOTION FROM THE TOTAL SANCTIONED POSTS OF SST (PHYSICS/MATHS) AND APPLY THE SERVICE RULES IN ITS TRUE LETTER AND SPIRIT TO MEET THE ENDS OF JUSTICE.

Respectfully Sheweth,

1. The appellant was initially appointed as Qari (BPS-07) on 27.08.2015 (Annexure-A) and has more than 06 years of commendable and unblemished service record at his credit.
2. Appellant is the only teacher acquiring qualification of M.Sc (Maths) in addition to his professional qualification of Bachelors of Education (B.Ed).
3. Twelve (12) posts of SST (Physics/Maths) are lying vacant since long (Annexure-B) wherein 25% is to be filled through initial appointment and 75 % is to be filled through promotion. (Copy of Rules as Annexure-C).
4. Departmental Promotion Committee (DPC) was conducted on 24th August, 2020 and some vacant posts of SST (Physics/Maths) were filled through promotion on 8th December, 2020. Despite being eligible and availability of vacant posts of SST (Physics/Maths), appellant was deferred and denied a promotion to the subject posts for having service less than five years. (Copy of DEO letter dated 11.08.2021 as Annexure-D)
5. Now after the lapse of more than six years of service, appellant having more than required length of service and he is the only eligible teacher, having qualification of M.Sc (Physics and Maths) in the seniority list (Annexure-E) of Qari/Senior Qari (Male), entitled to be promoted to the post of SST(Physics/Maths) rather than to be filled through initial appointment.
6. Respondents wrongly observed 3% share/quota for promotion from available vacant posts of SST (Physics/Maths) instead of **One Hundred and Ten (110) total sanctioned posts of SST (Physics/Maths)** (Annexure-F) and based on erroneous consideration of having 0.48% share in the promotion quota; refusing promotion to the appellant is without any lawful justification.
7. Appellant feeling aggrieved; filed departmental appeal (Annexure-G) against the impugned order which was rejected vide order dated 26th January, 2022. Hence, in the instant service appeal on the grounds inter alia: (Annex- H)

LEGAL GROUNDS:

- A. Respondents erred in observing 3% share, for promotion from Sr: Qari's/Qari's to SST(Physics/Maths), **from the 12 VACANT POSTS instead of 110 TOTAL SANCTIONED POSTS**; tantamount to denial of promotion by putting aside section 9(1) of KP Civil Servant Act 1974.
- B. As per 3% share from the 110 total sanctioned posts of SST(Phy/Maths), 3 posts are required to be filled by promotion amongst the Sr. Qari's/Qari's.

- C. Deviation from the basic principles of promotion, i.e. on the basis of seniority cum fitness amongst the eligible teachers is illegal, illogical and violation of promotion rules.
- D. The act of denying promotion to appellant and not observing quota in its true letter and spirit, despite his eligibility and availability of vacant posts, tantamount to violation of Article 25 & 38(e) of Constitution of Pakistan 1973 at respondent's end.
- E. Appellant possessing requisite qualification of M.Sc (Physics/Maths) with professional degree of B.Ed is otherwise entitled for promotion to subject post BUT denied due to non-application of service rules in its true letter and spirit and observing 3% share for promotion of Sr. Qari's/ Qari's to SST (Physics/Maths) from the available vacant posts instead of 110 total sanctioned posts.

E. Qari
Appellant

Through

Asad Mahmood
Asad Mahmood
Advocate High Court

AFFIDAVIT

It is solemnly affirm on oath that contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

ATTESTED

E. Qari
Deponent



APPOINTMENT.

Consequent upon the High Court decision vide writ petition W.P 1446-P/2015 Dated 18/05/2015 Director Education FATA Peshawar letter No.4571 dated 17/4/2015 and also approval by Deputy Commissioner/ Political Agent FR Kohat (Chairman Selection Committee) & interviewed by the Selection Committee, the following Male Candidates of FR Kohat Domicile holders are hereby appointed as Qari teachers in BPS-7 (Rs.7490-415-10940) PM plus usual Allowances with effect from the date of their taking over charge in the following schools in the interest of public service on the following terms and conditions.

S.No.	Name.	Desig:	Posted at	Remarks.
1.	Muhammad Saud	Qari	GMS Samandi Mela FR KT.	Against Vacant Qari post

TERMS AND CONDITIONS.

- 1) Charge report should be submitted to all concerned.
- 2) If a candidate wishes to resign his post he will give one Month prior notice or his pay for one month will be forfeited in lieu thereof.
- 3) They should produce their/his original Certificates/documents for verification/entry in S/Book.
- 4) They should produce their/his health and age Certificate from the Medical Superintendent Concerned.
- 5) They may not be handed over charge if their age is below 18 years or above 35 years age.
- 6) If they fails to report within 15 days then appointment will be treated as cancelled automatically.
- 7) If any technical legal flaw is pointed out the appointment will stand as cancelled.
- 8) Their pay will be drawn after the completion of verification process.

AGENCY EDUCATION OFFICER
FR KOHAT.

Copy for information and necessary action to the:-

- 1) Director Education FATA Peshawar.
- 2) Deputy Commissioner/ Political Agent FR Kohat.
- 3) Assistant Political Agent FR Kohat.
- 4) District Accounts Officer Kohat.
- 5) Principals/Headmasters of schools concerned.
- 6) AAEO (M) FR Kohat.
- 7) EMIS Cell FR Kohat.
- 8) Candidates Concerned.

AGENCY EDUCATION OFFICER
FR KOHAT.

WORKING PAPER**A. Promotion to Senior Teacher**

ITEM No.1 PROMOTION OF QARI (BPS-12) MALE TO THE POST OF SST PHY/MATH (BPS-16) ON REGULAR BASIS.

The case of promotion of QARI (BPS-12) to SST PHY/MATH (BPS-16) was considered and the DPC decided as under.

B. Promotion to SST PHY/MATH:**C.**

ITEM NO.1 PROMOTION OF QARI TO THE POST OF SST PHY/MATH BPS-16 ON REGULAR BASIS.

The case of promotion of QARI Male to SST PHY/MATH BPS-16 was considered and the DPC Decided as under

Total No of vacant post at SST PHY/MATH	12
25% Initial Recruitment Quota	03
75% Promotion Quota	09
50% CT/SCT Promotion Quota to SST PHY/MATH	05
20% PST/SPST/PHST Promotion Quota to SST PHY/MATH:	Nil
4% D.M/SDM Promotion Quota to SST PHY/MATH	
4% TT/STT Promotion Quota to SST PHY/MATH	0
4% AT/SAT Promotion Quota to SST PHY/MATH	
3% S.Qari Promotion Quota to SST PHY/MATH	01
Already Promoted QARI to SST PHY/MATH	0
Proposed for promotion to SST PHY/MATH	01

Sr. No.	Name of Official	Name of School	Date of Birth	Date of Appit: As Reg: Qari	Academic & Professional Qualification	Remarks
01	Mohammad Saood	GHS Shpalkival	08/09/1986	01/09/2015	B.Sc. Phy/Math B.ED	clear.

CERTIFICATE

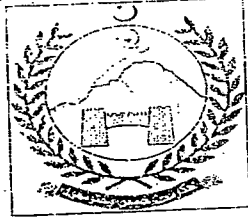
Note: (specimen of Certificate to be furnished by every DEO with the submission of promotion cases)

1. All the QARIs (Male/Female) have been included in the panel for promotion to SST PHY/MATH posts.
2. All the QARIs (Male/Female) hold the post on regular basis and none of them is on adhoc/acting charge/contract basis.
3. All the QARIs (Male/Female) have completed the required minimum length of qualifying service and qualifications as required for promotion to SST PHY/MATH under the rules.
4. None of them is deputation of any origination under the Federal/Provincial/Autonomous International Origination.


District Education Officer
Sub Div: Hassan Khel Peshawar

Annex C

6



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

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

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

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

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Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3;

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;

Provided that if no suitable candidate is available from amongst

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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty Five percent by initial recruitment.

Note:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment; each on need basis separately."

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

Endst : of even No & date:

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

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)



OFFICE OF THE EDUCATION OFFICER

Tribal Sub-Division Darra Kohat

G.O. No. 12/11 A. Tribal (Promo & Pay) 2021

No. 6061 / Dated: 11/08/2021


To

The Additional Director
NMD PeshawarSubject: APPEALS FOR DPC TO SST POSTS.

I am reference to your letter No.11286 dated 26/07/2021 on the subjected noted above & to submit detail report regarding the promotion of below mention teachers.

1. Mr. Muhammad Saood Qari GHS Shpalkiwal.
2. Mr. Rehmat Salam STT GHS Darra Adam Khel.

1. Departmental committee has been scheduled on 24/08/2020, at that time Mr. Muhammad Saood Qari GHS Shpalkiwal was not eligible for promotion as per rule due to less service. Therefore he was not honored for promotion. When another letter issued regarding DPC your office letter No.92959-93021 dated 12/10/2020 date for DPC extended up to 19/10/2020. Now he is legible for promotion on completion of 5 years of service.
2. The second applicant Mr, Rehmat Salam STT GHS Darra Adam Khel is BSc (Bio/Chem) B.Ed the share of TT is 4 % and total available posts by promotion is 09. TT share equal $4/100 \times 9 = 0.36$. There is no another candidate among AT.Qari,DM, so only one candidate has right to promote among Bio/Chem:. He is eligible for promotion as per criteria. Hence detail report is submitted for onward N/A as desired please.


DISTRICT EDUCATION OFFICER
TSD DARRA KOHAT

File No. 2415
Dated 12/18/2021
Directorate of Education
Merged Areas KPK Peshawar

DA
Jin
12/16

Final Seniority List of Qari/S.Qari Male Teachers in R/O TSD Darra Kohat Corrected up to 31/08/2021

S#	Sen: No.	NAME	FATHER NAME	School	D/O Birth	Designation	BPS	Qualification		D/O Ist: App:	D/O prom:	Domicile	Remarks
								Acad:	Prof:				
1	1	Irfan ullah	M.Afzal	GMS Sra Mela	1/7/1987	S.Qari	15	MA	B.Ed	31/03/2007	1/7/2015	F.R Kohat	General
2	2	Roshan Iqbal	Najeeb Gul	GHS Suni Khel	15/12/1972	S.Qari	15	MA	B.Ed	1/4/1992	20/02/2018	F.R Kohat	General
3	3	Gul Wali	Zabta Khan	GHS Ghariba	25/01/1974	Qari	12	FA	Any Other	9/1/1993		F.R Kohat	General
4	4	Wahid Gul	Ghuncha Gul	GHS Shin Dhand	8/2/1975	Qari	12	FA	Any Other	20/10/1994		F.R Kohat	General
5	5	Abdur Rehman	Fazal Rahim	GHS D.A.K	16/08/1980	Qari	12	MA	B.ED	29/09/2008		F.R Kohat	General
6	6	M.Saud	M.Shafiq	GMS Samandi Mela	8/9/1986	Qari	12	MSC	B.ED	01/09/2015		F.R Kohat	Phy:Math
7	7	Muhd Nawaz	Madad Khan	GHS Paya		Qari	12		Tajveed	7/5/2020		F.R Kohat	
7	8	Muhd Farooq	Adil Zaman	GHS Guz Darra		Qari	12		Tajveed	7/6/2020		F.R Kohat	

CERTIFICATES

1. That the said seniority is not subjadice in court
2. that said senirotiy is final and no apeal is panding against the seniority list in this office.

(Adul Salam)
District Education Officer
TSD Darra Kohat

Endst NO _____ Dated 11-01-2022

Copy of the above is to the :-

All the Principal Head Master and head teachers

Assistant D.E.O (Male)
TSD Darra Kpohat

(Adul Salam)
District Education Officer
TSD Darra Kohat

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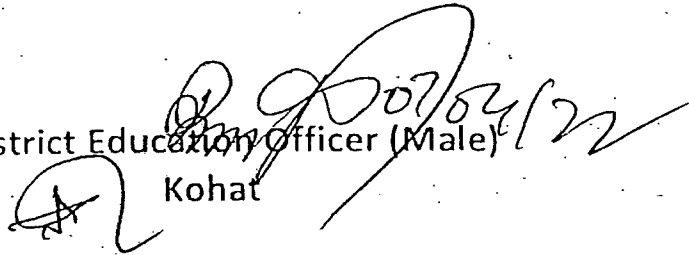
Annex-E

ANNEX - E
15

District Education Office Kohat

All sanction SST Cadre posts

S.No	Designation	BPS	Sanction
1	SST (G)	16	272
2	SST (P/M)	16	110
3	SST (B/C)	16	111
Total			493


District Education Officer (Male)
Kohat

To
The Director of Education
Elementary & Secondary Education KP/
Merged Districts Peshawar.

ANWAR-G sh / Jahanzaib
25/11/21
16

Subject: Appeal for consideration of appointment of SST (MATHS/PHY) Post through DPC.

Respected Sir,

Humbly It is requested that I Mr. Muhammad Saood s/o Muhammad Shafique had been appointed as Qari teacher in Education Department TSD Darra Kohat Vide DEO order No. 115 dated: 27/08/2015. I have done M.Sc Maths with professional qualification of B.Ed from University of Peshawar as a regular student. It is stated for your kind information that the departmental promotion committee held for various categories promotion to the higher scales and posts. I also submitted my files and documents for promotion from Qari to SST (Maths/Phy) through DEO office. Now on dated 05/12/2020 Director of Education KP issued promotion orders for various posts but I remain dropped from the mentioned promotion for the reason that department has no vacant posts but still now there are Two (2) SST (Maths/Phy) vacant posts in Education department TSD Darra Kohat. I also submitted my appeal Dairy No. 3530 on date: 10/12/2020 for consideration to Director of Elementary and Secondary Education KP. I fulfill all the requirements for promotion. In the last for DPC was extended to 19/10/2020 and I am suitable for promotion because I have combination of Maths + Physics in B.Sc with B.Ed and completed five years of service.

Now it is requested please consider my name for SST (Maths/Phy) promotion or inquiry may please be ordered to properly probe the matter.

Thanks

Yours Sincerely,

Muhammad Saood Saood

CNIC #: 22401-9286301-7

Contact No. 0305-9234023

Qari at GHS Shpalkiwal TSD Darra Kohat

Mr. DPC (1/11/21)
Mr. H. Saood
Mr. H. Saood
Mr. H. Saood

1708
25/11/21



DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

Annex-H

(17)

NO. 1152 DATED 24/11/2022

To

The District Education Officer (Male),
SD Dara Adam Khel Kohat

Subject: - APPEALS FOR DPC TO SST POSTS.

I am directed to refer to your letter No. 6061 Dated 11-08-2021 on the subject cited above and to state that there were Twelve (12) posts of SST (P/M) Male vacant in your respective Sub Division, out of which 03 posts were allocated for Initial Recruitment @ 25 % Quota and 09 posts for Departmental Promotion @ 75% Quota. The share of TT @ 04% Quota and Qari @ 03% Quota is just 0.48 & 0.36 respectively, which is not applicable as per the existing rules and policy.

Keeping in view the above mentioned facts, the Competent Authority is pleased to reject the appeals in respect of the following teachers.

1. Mr. Rahmat Salam STT GHS Dara Adam Khel Kohat.
2. Muhammad Saood Qari GHS Shpalkiwal SD DAK Kohat.

I am further directed to ask you to inform the teachers concerned accordingly.

Assistant Director (Estab)
Merged Areas

Endst: No. 1152

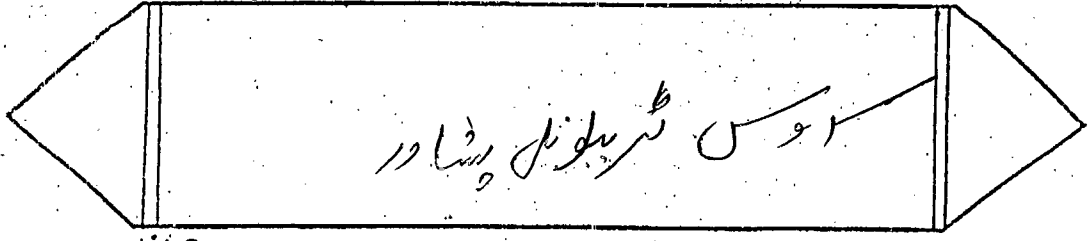
Copy of the above is forwarded to the:-

1. PA to Director Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab)
Merged Areas

AD-CE

بعدالت



2 مخانب

بنام
Mahamud Saad

Vs

سورخہ
مقدمہ
دعویٰ
جرم

Education Dept

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام _____ کیلئے _____ اور _____ کے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو یہی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted
[Signature]

20

ماہ

المرقوم

_____ واہ العب _____

کے لئے منظور ہے۔

بمقام