

- 20th July 2022 1. None for the appellant present.
 - 2. Since the inception of this appeal, the matter was fixed for more than once and notices were issued to the appellant and his counsel but since, 26.01.2020 nobody has turned up on behalf of the appellant, therefore, this appeal is dismissed for non-prosecution. Consign.
 - 3. Pronounced in open court in Camp Court Abbottabad and given under my hand and seal of the Tribunal on this 20th day of July, 2022.

* Renter

(Kalim Arshad Khan) Chairman Camp Court Abbottabad Nemo for the appellant.

Previous date was changed on Reader Note, therefore, notice for prosecution the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 29.12.2021 at Camp Court Abbottabad.

(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

29.12.2021

None present on behalf of the appellant. Notices be issued to appellant as well as his counsel for next date. Case to come up for preliminary hearing on 16.02.2022 before S.B at camp court, Abbottabad.

Chairmair
Camp Court, A/Abad

Tribut is use functional. To one of the same on 2017/22 at comp court

Form- A FORM OF ORDER SHEET

Court of			
Case No	1/29	/2021	_

.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	. 2	3
1	26.01.2020	The present appeal was returned to the counsel for the
		appellant for completion and resubmission today i.e. or 26.01.2021 he has resubmitted the same late by 365 days. The
		same may be entered in the institution register and put up to
2		the Worthy Chairman for proper order please. REGISTRAR
		This case is entrusted to touring S. Bench at A.Abad for
		preliminary hearing to be put up there on 18-06-2021
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18.	06.2021.	Due to COVID-19, tour to Abbottation Annas be
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The appeal of Mr. Mujeeb-ur-Rehman son of Muhammad Sabir Khan PST GPS Goreeni Tehsil Havelian District Abbottabad received today i.e. on 20.01.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexures-A, F and J of the appeal are illegible which may be replaced by legible/better one.

No. 210 /S.T.

Dt. <u>21 - 0 1</u> /2020.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Liaqat Adv. High Court Abbottabad.

All above objection removed and file re Sombiffed Please.

1111 26-0-2011

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

/629 Appeal No. ___/202(

Mujeeb ur Rehman son of Muhammad Sabir Khan, PST GPS, Goreeni Tehsil Havelian, District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar & Others

.....RESPONDENTS

SERVICE APPEAL

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2	Application for Suspension of Operation	7 to 8	
3	Copy of appointment order and pay slip	9+10	"A" & "B"
4	Copy of HSSC certificate	11	"C"
5	Copy of writ petition and order	12 1015	"D" & "E
6	Copy of the Policy dated 13/11/2012, 30/01/2018 and impugned order dated 18-12-2019	16 to 36	"F" "G" & "H"
7	Attested copy of the Judgment dated 07-11-2018	37 to 41	["
8	Copy of minutes of the meeting dated 08-05-2018	42 to 45	uj»
10	Wakalatnama	46	

Dated: 13/01/2020

Albhasi

..APPELLANT

Through

(Muhammad Liaqat)
(Advocate High Court, Abbottabad)



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

/629 Appeal No. ____/2020

Mujeeb ur Rehman son of Muhammad Sabir Khan, PST GPS, Goreeni Tehsil Havelian, District Abbottabad.

.....APPELLANT

Kayber Paklaukiiwa Service Tribunal

VERSUS

20/01/2020

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar.
- 2. Director, Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa Peshawar.
- 3. District Education Officer (M) Abbottabad.
- 4. Sub Divisional Education Officer (M) Lower Tanawal Abbottabad.

.....RESPONDENTS



APPEAL UNDER SECTION 4 OF NWFP (NOW KPK) SERVICE TRIBUNAL, ACT, 1974 AGAINST THE OFFICE ORDER NO.13052/ADEO(Lit) DATED 18-12-2019 ISSUED BY RESPONDANT NO.3 VIDE WHICH DEPARTMENTAL REPRSENTATION OF THE APPELLANT WAS DISMISSED WHICH IS TOTALLY AGAINST THE LAW, POLICY, WITHOUT JURISDICTION, ARBITRARILY, VOID ABINITIO, AND HAVING NO LEGAL EFFECT UPON THE VESTED RIGHTS OF THE APPELLANT.

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED ORDER ENDST: NO. 13052/ADEO(Lit) DATED 18-12-2019 ISSUED BY RESPONDANT NO.3 MAY

2/

GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY GRACIOUOSLY BE DIRECTED TO PROMOTE THE APPELLANT FROM PST BPS-12 TO SPST BPS-14 AND PSHT BPS-15 WITH ALL BACK BENEFITS AS PER NOTIFICATION NO. SO(PE)SSRC/MEETING/2012/TEACHING CADRE DATED 13-11-2012. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS PROPER IN THE CIRCUMSTANCES OF THE CASE BE GRANTED.

Respectfully Sheweth:-

- 1. That the appellant was appointed as PTC/PST on 08-11-1989 having prescribed qualification and presently working as PST BPS-13 at GPS Goreeni Lora, Tehsil Havelian, District Abbottabad. (Copy of appointment order and pay slip are annexed herewith as Annexure "A" & "B" respectively).
- 2. That the appellant passed HSSC in the year of 2015. (Copy of HSSC certificate is annexed as Annexure "C").
- 3. That after passing the HSSC petitioner move an application to respondent No. 3 for promotion according to notification dated 13/11/2012 but respondent NO. 3 did no promote the petitioner one way or other pretext. All the relevant documents are lying in the office of respondent No. 2.
- 4. That appellant being aggrieved filed writ petition before the August High Court, Abbottabad Bench in which High Court Abbottabad Bench treated the writ petition of the appellant as departmental representation and same was sent to

respondent for decision. Copy of writ petition and order is attached as Annexure "D" & "E".

5. That the request/ departmental representation of the appellant was rejected by the respondent No. 3 vide Endst: No. 13052 dated 18-12-2019 with the remarks that as per Notification dated 30-01-2018 appellant do not fulfill the requisite eligibility criteria for promotion. (Copy of the Policy dated 13/11/2012, 30/01/2018 and impugned order dated 18-12-2019 is annexed herewith as annexure "F" "G" & "H").

Now appellant seeks indulgence of this Honourable Tribunal for setting aside the impugned order dated 18-12-2019 interalia on the following amongst many others:-

GROUNDS:-

- a) That the impugned order dated 18-12-2019 against the law, facts and circumstances.
- b) That the impugned order is illegal passed in highly capricious manner which is void abinitio and without legal authority.
- c) That the respondents had illegally not consider the appellant for promotion and deprived the appellant for his legal right.
- d) That the identical issue was decided by the Honourable Peshawar High Court Abbottabad Bench in WP No. 207-A/2018 dated 07-11-2018 wherein, Honourable Court held that "there is no mention in Notification dated 30-01-2018 that the same would have retrospective effect." (Attested

copy of the Judgment dated: 07-11-2018 is annexed here with as Annexure "I").

- e) That the impugned order dated 18-12-2019 is against the Policy as a meeting was held on 08-05-2018 at committee room of E&SE KP under the chairmanship of respondent No. 2 wherein, issue of promotion was discussed at Serial No. 10 and respondent No. 2 directed all the DEOs including respondent No. 3 "that the promotion cases of PSTs to SPSTs/PSHTs must be entertained according to the previous Policy of promotion while new Rules are to be applied for new induction/recruitment." (Copy of minutes of the meeting dated 08-05-2018 is annexed herewith as Annexure "J").
- f) That the Notification dated 30-01-2018 is not applicable in the case of appellant as at the time of appointment no such terms and conditions was incorporated in the appointment order of the appellant. Hence, Notification dated 30-01-2018 has no legal value in the case of appellant as appellant is eligible for promotion in view of Notification No. SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012.
- g) That the Notification dated 30-01-2018 is silent whether the same would have retrospective or prospective effect. Hence, impugned order dated 18-18-12-2019 is liable to be set aside on this score alone.
- h) That the valuable rights of the appellant are involved.

5/

- i) That the appellant seeks leave of this Honourable Tribunal to raise additional grounds during the course of arguments with the permission of Honourable Tribunal.
- j) That the instant service appeal is well within time.
- k) That the other points shall be urged at the time of arguments.

It is, therefore, very humbly prayed that on acceptance of instant appeal impugned order issued vide Endst: No. 13052/ADEO(Lit) dated 18-12-2019 issued by respondent No.3 may graciously be set-aside and respondents may graciously be directed to promote the appellant from PST BPS-12 to SPST BPS-14 and PSHT BPS-15 alongwith all back benefits as per Notification No. SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012. Any other relief which this Honourable Tribunal deems proper in the circumstances of the case be granted.

Dated: 13/01/2020

∆yobaşı ...APPELLANT

Through

(Muhammad Liaqat) (Advocate High Court, Abbottabad)

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

....APPELLANT

5/

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal	No.	/2020

Mujeeb ur Rehman son of Muhammad Sabir Khan, PST GPS, Goreeni Tehsil Havelian, District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar & Others

.....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Mujeeb ur Rehman son of Muhammad Sabir Khan, PST GPS, Goreeni Tehsil Havelian, District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Mbbosi DEPONENT

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. ____/2020

Mujeeb ur Rehman son of Muhammad Sabir Khan, PST GPS, Goreeni Tehsil Havelian, District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar & Others

.....RESPONDENTS

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF OPERATION OF THE ORDER NO. 10629-31 DATED 26/09/2019 TILL THE DECISION OF THE ABOVE TITLED SERVICE APPEAL.

Respectfully Sheweth:-

That the petitioner/appellant submits as under:-

- 1. That the above referred service Appeal is going to be filed in this Honourable Tribunal and instant application may please be considered as integral part of the appeal in hand.
- 2. That the service appeal of the petitioner /appellant is prima facie in nature as the impugned order dated 18/12/2018 was issued without lawful authority and clear cut violation of direction of respondent No. 2.

- 3. That the balance of connivance is also in the favour of appellant.
- 4. That in case of non suspension of operation of order dated 26/09/2019 the appeal of the appellant would become infructuous and appellant would be suffered irreparable loss.
- 5. That all the basic ingredients regarding suspension of the operation of order dated 26/09/2019 temporary injunction is fulfilled under the law.

It is, therefore, respectfully prayed that on acceptance of instant application operation of the order dated 26/09/2019 may kindly be suspended till the decision of titled Service Appeal.

Dated: 13/01/2020

AlbbasiAPPELLANT

Through

(Muhamad Liaqat) (Advocate High Court, Abbottabad)

AFFADAVIT

I, Mujeeb ur Rehman son of Muhammad Sabir Khan, PST GPS, Goreeni Tehsil Havelian, District Abbottabad, declare on oath that the contents of forgoing application are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

NOTARY RUBLIC SO (Judi):HD/4-12/2014 (42/Vot4

Oldbasi DEPONENT

ATSTRICT EDUCATION (TAL DADBOTTABLE DICTIAL

ortice Order do 39 / 17/PT. Vated A. Abal 1 1 2 / 1/198

As Appro of k, the choliman histi: Per: The appointments of the fullowing condition of ordered as P.T. Teachers in Basic For Scale-7(K.750-31-. P. Tixed plus usual allowances as admissible under the place of schools as noted against each in the interest of Public or the effect from the date of taking over charge.

s. v	lo. Name of Candidates and Address	Schools where	gen rks.
	R/O Assyry Sor (Gorceni)	600.Wagri Tutiel	The Market
Ch	Wagir S/7 /bdul Tabber . R/O 'owshera(Tajwal	Ors.Hugri Tutial	flut-
31.	Mohd Saldem 5/0 Sher Zuman R/O Tatreula Vajri Bala)	GPs, Lugri Settel	-do-
4.	Chulam Mustafa 3/0 Dal han R/O Tatreela Nagri Bala	Mos:Chah Batangi	-do- · / /-
5.	Saeedur Rehman S/O Ali Afsar R/O Wakkar Bugh(Wagri Bala)	CPS.Nakar Mujwal	-du-
6.	Sarfaraz S/O Nir Dad . R/J Tatraela (Nagri Bala)	dro.Danna (Jarda)	$-do-$, $\int_{U(x)}^{\infty}$
7:	Naseer Ahmad S/O Mohd Sadiq R/O Tatreela(Lugri Balu)	GPS. Gala Bhan	-do- ,
9,	Hub mand Sultan S/O Waiz-up Rehman-R/O Regri Balo	GPS. Nakupr Pakhu	-4
Э.	Heroonur Rashid S/D Mond Ashrai R/O Mamil Majra	CS. Kutli (Phalkota) -de-
10.	Anwar Zaib S/O Aurangzaib R/O Namli Maira	GPS.Malkote	
118	R/O Suman lar (atha	GPS. Drawcir	-do-
12.	MbHdl Caddus S/O Abdul Ghalar 3/0 Tajwal	GMS.Surjal	to- ' p. ·
13. .	Pilder S/O Abdul Gheffar . R/O Kaghien U/C Tajual.	G: S. Taghan	-do-
14.	.Shah Zaman S/O Gulab Khan R/O Vagri Tutial	GMERS Helmoole	-do- in .
15.	Javaid S/O Abdul Qadlus R/O Pasila	GPS. Donné. Surjel .	-do-
16.	Mohd Banaras S/O Khani Zamen R/O Nalkar(Uagh)	Mos: Dakhan Khhan sa	ilan -do- Ym
·17.	Mohd Ishaq S/O Mohd Ajab R/O Jhaffar	GPS.Jogimar	-do-
1ġ.	Mond Sabir S/O Mond Sadiq	GpS.Majoth	नेवार्थः । व्यक्तिः । व्यक्तिः । -do- ्रीतः जन्मः ।

Batter Gpy 9A

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE) ABBOTTABAD DISTRICT ABBOTTABAD.

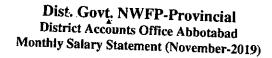
Office Order No. 39/PTC/PT Dated A.Abot the 8 711/1989

APPOINTMENT.

As approved by the chairman District Development committees ordered as P.T. Teachers in Basic Scale-7(Rs.750-31-____) Rs. 750 by PM Fixed plus usual allowances as admissible under the rules in schools as noted against each in the interest of Public services effect from the date of taking over charge.

S.No.	Name of Candidates and Address	Schools where appointed	Remarks		
1.	Mujeebur Rehman S/o Mohd Sabir R/o (Goreeni)	GPS Nagri Tutici.	-do-		
2.	Waqir S/o Abdul Jabbar R/o Nowshera (Tajwal)	GPS Nagri Tutial	-do-		
3.	Mohd Saleem S/o Sheir Zaman R/o Tatreela Nagri Bala)	GPS Nagri Tutial	-do-		
4.	Ghulam Mustafa S/o Lal Khan R/o Tatreela Nagri Bala)	Mos:Chah Batangi	-do-		
5.	Saeedur Rehman S/o Ali Afsar R/o Nakkar Bagh (Nagri Bala)	GPS Nakar Mujwal	-do-		
6.	Sarfaraz S/o Mir Dad R/o Tatreela (Nagri Bala)	GPS Danna Musrial	-do-		
7.	7. Naseer Ahmad S/o Mohd Saddiq R/o Tatreela Nagri Bala) GPS Kala Bhan				
8.	. Muhammad Sultan S/o Aziz-ur-Rehman R/o Nagri Bala GPS Nakkar Pakhu				
9.	Haroonur Rashid S/o Mohd Ashrif R/o Namli Maria	GPS Kutli (Phatiota)	-do-		
10.	Anwar Zaib S/o Aurangzaib R/o Namli Maria	GPS Malkoti *	-do-		
· 11.	Mohd Yousif S/o Mohd Yaqub R/o Sumandar Katha	GPS Brsweir	-do-		
12.	Abdul Qaddus S/o Abdul Ghafar R/o Tajwal	GMS Surjal	-do-		
13.	Dildar Khan S/o Abdul Ghaffar R/o Kanshian U/C Tajwal	GPS Tajhan	-do-		
14.	Shah Zaman S/o Gulab Khan R/o Nagri Tutial	GMPS Ikalmoola	-do-		
15.	Javaid S/o Abdul Qaddus R/o Pasala	GPS Danna Surjal	-do-		
16.	Mohd Banaris S/o Khani Zaman R/o Nakkar (Bagh)	Mos Dakhan Khhan Kalan do	-do-		
17.	Mohd Ishaq S/o Mohd Ajab R/o Jhaffar	GPS Jogimar	-do-		
18.	Mohd Sabir S/o Mohd Sadiq R/o Malsa	GPS Majoth	-do-		

AMP





Personal Information of Mr MUJIB UR REHMAN d/w/s of MUHAMMAD SABIR

Personnel Number: 00014348

CNIC: 1310108744515

Date of Birth: 14.02.1971

Entry into Govt. Service: 18.11.1989

80667879-DISTRICT GOVERNMENT KHYBE

Length of Service: 30 Years 00 Months 014 Days

Employment Category: Active Temporary

Designation: SENIOR PRIMARY SCHOOL TEA

DDO Code: AD6280-District Abbottabad

Payroll Section: 003

GPF Section: 001

Cash Center: 11

GPF A/C No: EDUAD013514

Interest Applied: Yes

GPF Balance:

215,102.00

Vendor Number: -Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 14

Pay Stage: 20

) <u>8</u> -1 <u>-</u> 0
Wage type	Amount	Wage type	
0001 Basic Pay	38,580.00	1000 House Rent Allowance	Amount
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	2,214.00
2148 15% Adhoc Relief All-2013		2199 Adhoc Relief Allow @10%	1,500.00
2211 Adhoc Relief All 2016 10%	3.036.00	2224 Adhoc Relief All 2017 10%	564.00
2247 Adhoc Relicf All 2018 10%	3,858.00	2264 Adhoc Relief All 2019 10%	3,858.00

Deductions - General

12	Wage type	Amount	Wage type	
	014 GPF Subscription 609 Income Tax	-2,620.00	3501 Benevolent Fund	Amount
_	004 R. Benefits & Death Comp:		3990 Emp.Edu. Fund KPK	-600.00
	Comp:	-600.00		-125.00

Deductions - Loans and Advances

	Loan				
		Description	Principal amount	7	
į	6505	GPF Loan Principal Instal		Deduction	Balance
			550,000.00	-15.278.00	510.444.00

Deductions - Income Tax

Payable:

6,674.44

Recovered till NOV-2019:

1,892.00

Exempted: 1668.49

Recoverable:

3,113.95

Gross Pay (Rs.):

61,124.00

Deductions: (Rs.):

-19,668.00

Net Pay: (Rs.):

41,456.00

Payec Name: MUJIB UR REHMAN

Account Number: 4126-9

Bank Details: NATIONAL BANK OF PAKISTAN, 231609 NBP LORA, Abbottabad

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address:

City: ABBOTTABAD

Domicile: NW - Khyber Pakhtunkhwa

Temp. Address: City:

Email: mujeeburrehmanabbasi786@gmail.com

Housing Status: No Official

System generated document in accordance with APPM 4.6.12.9 (SERVICES/02.12.2019/16:16:18/v1.1) * All amounts are in Pak Rupees * Errors & omissions excepted



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

ABBOTTABAD

Khyber Pakhtunkhwa (Pakistan)

and the equipment of the summer con-

387830151

PROVISIONAL & DETAILED MARKS CERTIFICATE

Rali	

87830

Group:

HUMANITIES

Part - II

Session: 2015 (Annual)

Namo:

MUJIB UR REHMAN

Father Name:

MUHAMMAD SABIR KHAN

Reg No:

8237AB/AD-inUMP14

Institution

Jointel

ABBOTTABAD

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May/June as a Private Candidate.

		Marks Obtained					otained
Subjects	Marks	Part-I		Part-II		Total	Narks in Words
		Theon	Press	Theory	Prost		
English	200	39	-	36		75	Seventy-Five
Urdu (Comp)	200	42		45	1	87	Eighty-Seven
istemyct Computsory	50	20	-	••	-	20	Twenty Only
Polision Scotes	50	+-	-	36		36	Thirty-Six
ktenic Hskry	200	62	-	48	-	110	One Hundred Ton Only
Cives	200	65	-	63		128	One Hundred Twenty-Eight
istanyai Elociae	200	74		52		126	One Hundred Twenty-Six
						582.0	Five Hundred Eighty-Two Only

Total: 1100

Remarks:

Date: 06 August, 2015

Checked By

Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated. within 30 days of the issuance date of this certificate to DISE Abbottaged. Val. us. www bisectd odu ph

Muhammad Kaleem GPS Thora Kalan District Abbottabad

Qadeer Ahmed GPS Batangi, District Abbottabad. Ż:

Muhammad Tarig GPS Lora, District Abbottabad. 3. .

Ageel Ahmed GPS Tarar, District Abbottabad, 4.:

- Muhammad Zaheer GPS Goreeni, District Abbottabad. 3... Mujeeb ur Rehman GPS Goreeni, District Abbottabad
- 6. Mir Baz Khan Fatch, District Abbottabad. 7:
- Muhammad Iqbal GPS No. 4, District Abbottabad. 8.
- Rab Nawaz 9.
- Imtiaz Khan 10.
- Muhammad Javed 11.
- Khawaja Waqar GPS Dara Amah, District Abbottabad. 1**2**.
- Sajid Mehmood 13.
- Mubarak Ali 14.
- Safdar Hussain 1.5.
- Nusrat Inbal GPS Thana Karamshah, District Abbottabad. 16.
- Zahoor Ahmed GPS Mona Changra, District Abbottabad. 17.

Shfique GPS Chehr, District Abbottabad.

... PETITIONERS

aminad Llagat

VERSUS

Govt. of Khyber Pakhtunkhwa, Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

- Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, 2., Peshawar.
- Dispact Education Officer (Male), Abbottabad. 3.
- District Account Officer, Albertabad. 4.

... RESPONDENTS

THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 FOR DECLARATION TO THE EFFECT THAT THE PETITIONERS ARE ELIGIBLE FOR PROMOTION FROM SPST BPS-14 TO PHST BPS-15 AS PER PROMOTION POLICY 2013 BUT THE RESPONDENTS ARE NOT PROMOTING THE PETITIONERS FROM THE POST OF SPST TO PHST DUE TO THE REASONS THAT AS PER NEW POLICY/RULES, NOTIFICATION DATED 30/01/2018

PROMOTION FOR PHST IS BA WHEREAS, IN

OUALIFICATION FOR PROMOTION TO THE

SAID IS FA, HENCE THE PETITIONERS ARE

ELIGIBLE TO BE PROMOTED AS PHST BPS-

POLICY

FOR UP-GRADATION/

2013

THE

OF

OUALIFICATION

OLD

15 AS PER POLICY 2013.

"THE

WRIT PETITION UNDER ARTICLE 199 OF

Muhammad Liagat

Certified to be True Copy

Certified to be True Copy

SEP 2113

Peshawar High Count Aid Bench

Authorized Under Se: 15 Evid Ordins:

PRAYER: ON ACCEPTANCE OF THE INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO UPGRADE/ PROMOTE THE PETITIONERS

2 14

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of		o de la compansión de la	* * * * * * * * * * * * * * * * * * *	
Case No	•		18	POITARIOS

Case	
Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
26.09.2019	WP No. 1008-A/2019.
	Present: Mr. Muhammad Arshad Khan Tanoli, Advocate for petitioners. ***
• :	IJAZ ANWAR, J. Through this petition under Article 199 of
	the Constitution of Islamic Republic of Pakistan, 1973,
1	petitioners Muhammad Kaleem & seventeen others have made
	the following prayer:-
aqat	That on acceptance on instant writ
	petition, respondents may graciously be
	directed to upgrade/promote the
	petitioners from SPST BPS-14 to PHCT
	BPS-15 under the old policy of 2013.
COPY	2. At the very outset, learned counsel for petitioners
A CONTRACTOR OF THE CONTRACTOR	when confronted that the question raised in the instant writ
ide Bendh	petition relates to the terms and conditions of service he
O That is the state of the stat	stated that petitioners would not press this petition
	anymore, if this writ petition is converted into
تعون	departmental representation/s and send the same to the
	respondent/department for its decision.
54	3. In view of the peculiar facts and circumstances of

ENTITIES TO SE THE CODY

the present writ petition, this Court in the larger interest of justice, and in the light of case law reported as 2017 PLC (C.S), 692 and 2004 PLC (C.S) 1240, treats the present petition as departmental representation/s of the petitioners with directions to respondent/department to consider the grievance of petitioners and decide the matter, strictly in accordance with the law, within statutory period and decisions so made be also communicated to the petitioners. In case the petitioners find themselves still aggrieved after the receipt of reply or if no reply is received, the petitioners may approach the competent forum for the redressal of their grievance.

JUDGE

JUDGE

Hon ble Justice Ijaz Anwar & Hon ble Justice Shakeel Ahmad.

ANNEXURE

COVERNMENT OF THE KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshavor, dated the November 13,2072.

No. S.C. P.F. 14. 5.558 C/Aircring/2012/Conclude Cultrer- in pursuance of the profisions commined in substance (2) officele 3 of the Klinber Pukhtunktime Civi Secretary L'Appeninument, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Occument the consultation with the Establishment Department and the Finance Department bereby lays down the method of necessaries Que libration and after conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 as the Said Appendix and the schedule therewith:

SECRETARY TO COVERNMENT OF THE KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT,

Engel No. 7. Descriptions

Copy fermarded to -

- The Secretary to Goyl, of Kityber Pakittenkhwa, Eslablishman Department.
- 2. The Secretary to Sovi, of knyber Parmenkhwa, Pinance Department.
- The Societary to Gold, of Kinyber Rachtenklines, Lew Department.
- The Decretory Knyper Pakinghikhwa, Public Service Commission Restrawer.
- The Accoment General Knyber Pakitzunkhwa Peshawar,
- The Oirector (ESSE) Knyber Pakhlunkswa Peshawar,
- The Caecior Education (FATA), Peshanes.

Muhammad Liagat Advocate





The Grector Curriculum & Teachers Education Abbotiabad.

The Bireclor (PITE) Knyber Pakhtunkhwa Peshawar.

The Dispetor ESRU, Elementary & Secondary Education Knyber Pathtunkhara, Peshawar.

11. The Deputy Displor Database (EMIS) E&SE Department.

12. All Displor Coordination Officers in Knyber Pakhtunkhara.

13. All Executive District Officers Elementary & Secondary Education in Knyber Pakhtunkhara.

14. All District Accounts Officers in Knyber Pakhtunkhara (Agency Accounts Officers FATA).

15. All Agency Education Officers FATA. 16. P.S to Governor, Knyber Pakintunkhwa.

17. P.S to Chief Minister, Knyber Pakhtunkhwa.
17. P.S to Chief Minister, Knyber Pakhtunkhwa.
16. P.S to Chief Secretary Khyber Pakhtunkhwa.
15. PS to Minister E&SE Knyber Pakhtunkhwa Poshenjar.
20. PS to Secretary 2&SE Department.
21. Master File.





1	Namenciature of the post. 2. Secondary School Teacher (BPS-16).	Age	Fifty percent by promotion on the basis of sentority-cam-fitness, in the following pranaer: (i) forty per cent from amount the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Florie 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 havin qualification mentioned in column 140.3:
			(iii) four per cent from amongst it Physical Education Teachers wi at least live years acroice as str- and having qualification mercion in column No. 3:

Advocate

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			Instru with such	ner cent from amongse to crional Material Specialis attent five years sorvice and having qualificationed in column No. 31 and		
Tan (Marie Landen)			Arabic vears	per cent from emongst to Teachers with at least in service as such and havingtion mentioned in Cotus and		
		4		by initial recruitment.		
2	Senior Arabic Teacher (SAT) (BPS-16)		fitness, from amout least five years is qualification as recruitment of Arab	By promotion, on the basis of seniority-cur fitness, from amongst Arabic Teachers, with least five years service as such and havi qualification as prescribed for inte recruitment of Arabic Teacher. By promotion, on the basis of seniority-cur fitness, from amongst Theology Teachers, wi at least five years service as such and havi qualification as prescribed for initial recruitme of Theology Teacher.		
3.	Senior Theology Teacher (SIT) (B-16)	<u> </u>	finess, from amon at least five years qualification as pro- of Theology Teach			
.12.	Senier Certified Teacher (\$CTgGeneral) (BPS-16).		fitness, from an (General), with at le	the basis of seniority-on tongst Certified Teachers as five years service as surion as prescribed for initiated Teacher (General).		

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Muhammad Liaqat Advocate

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	mileo (Lacer massial Aris) (BPS-10).		By promotion on the basis of seniority-cum masss, from amongst Certified Teacher (Industrial Aris), with at least five years service as such and having qualification as prescribe for initial recruitment of Certified Teacher (Industrial Aris):
<u> </u>	Senior Cortified Teacher (Agriculture) (JPS-16).		By promotion, on the basis of seniority-cum finess, from amongst Certified Teache (Agriculture), with at feast five years service such and having qualification as prescribed having qualification as qualificat
7.	Senior Drawing Master		By promotion on the basis of sentority cur fances from amongst Drawing Masters, with
· · · · ·	(BPS-16'). Senior Certified Teacher	yl	of Drawing Master By promotion, on the basis, of semonty-cor
S.	(SCT) (Home Economics) (BPS-16).	4	Economics), with at least to as prescribed such and having qualification as prescribed mittal recruitment of Certified Teacher (Horizola Perchant Continued Tea
· 9,	Senior Physical Education Teacher (BPS-16).		By promotion, on the basis of seniority-cu fitness, from amongst. Physical Educat Teachers, with at least five years service as si and having qualification as prescribed for infectationant of Physical Education Teacher.

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Muhammad Liagat Advocate

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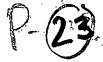
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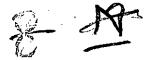
e geographic and	*	Contilicate or two years Associate Degree Education from a recognized University or eighte months Diploma in Education.	in a)	(b) sixty per cent by promotion, on the busic of seniority-cem-funess, from amongs the Primary School Head Teachers with at least five years service and having
				qualification prescribed for initia recruitment of Certified Teache (General): Provided that if no spitable candidate is available amongst the Primary School Head Teachers for uparsfer, then the posts will be filled by promotion on the basis of seniority-cum fitness, from amongst Senior Primar School Teachers with at least five year service and baving qualification prescribed for initial recruitment of Certified Teacher (General).
			in the state of th	Note: In case of non availability of suitable person for promotion; then by initial recruitment.
	(industrial Arts) (ISPS-15).	(i) Buchelor'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 (ii) Bachelor's Degree from a recognized	vears.	(b) Forty per cent by initial recruitment; and (b) sixty per cent by promotion, on the basi of seniority-cum-litness, from innonge the Primary School Head Teachers wif at least five years service and havin qualification prescribed for initia recruitment of Certified Teacher

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Muhammad Liagat Advocate







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 -		University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Conflict.	(Industrial Arts): Provided that if no suitable amongst the
. •		Teacher, Agro technical (Industrial Arts).	Primary School Head leachers to
	•		by promotion on the basis of senions
:		**************************************	Printary School Teachers with at 1821.
		and the second of the second o	qualification prescribed for initial recruiment of Certified Fencial
Í		Crescion	(Industrial Arts). Note: in case of non availability of suitable
			person for promotion, then by milit
15.	Consided Teacher (Assiculture)	(i) Bacileir's rolls one year theiring in	18 to 35 (a) Forty per cent by Initial recomment; and years. (b) sixty per cent by promotion on the basi
	(BPS-15).	Agriculture from any Government institute or	of senferity-cum-finess from among:
		Government Agrol Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or	at least five years service and having qualification prescribed for initial recruitment of Certified Teache
		ren Parkolar's Deeree with Agriculture as one of	(Agriculture):
-		the subject, from a recognized University; or (iii) Buchelor's Degree from a recognized	Provided that if no suitable candidate is available amongst the
		(iii) Bueholor's Degree from a recognized:	



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** _{jj}		any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		premision, then the posis will be follow by premotion on the busis of senior Primary funess, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).
·				Note: In case of non availability of sultable person for promotion, then by initial recruitment.
16.	Centified Teacher (Home Economics) (BPS-15).	(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro. Technical Teacher Training Center; or (ii) Certified Teacher Certificate with Planc Economics, as one of the subjects, from any Government Training school or college with Paghelor's Degree; or	18 (0 37 years	(b) sixty per cent by promotion, on the basis of seniority-cum-filness, from uniongst the Primacy School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):
		(iii) Bachelor's Degree from a recognized University with nine months training from Government Agio Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home-Economics); or		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 cumfiness, from imposts Senior Primary School Teachers with at least time years service and having qualification prescribed for initial recomment of
		Moel	•	

Muhammad Liaqat Advocate

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University with one year vocational training
from any Generalical usining center or
most unities entron one they surficing
Government Aero, Technical Feacher
Training center of the level of certified
Teacher Agro Technical (Home Economics).

Centified Teacher (Home Economics).

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

17. Drawing Muster (BPS-15).

Bachelor's Degree from a recognized University with one year Drawing Moster (DM) course Certificate:

18 to 35

- a) Fighty per cent by initial recruitment; and
- basis of seniority-constituess, froi amongst the Primary School Her Teachers with at least five years service and having qualification prescribed initial recruitment of Drawing Master.

Previded that if no suited candidate is available for promotion the on the basis of seniority-cum-littees from Senior Primary School Teache with at least five years service and have qualification prescribed for initiary recruitment of Diawing Master.

Note: In case of non-availability of suital candidate for promotion, then by inn recruitment.

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	,	The property of the second	181035	(a) Eighty per cent by initial recruitments ar
	Piscelled Education: Teacher (BPS-15).	Bachelor's Degrée from a recognized University with one year junior Diploma in Physical Education course of Asmy equivalency or other equivalent qualification.		(b) twenty per cent by promotion, on the basis of seniority-cum-finess, froumoagst the Primary School Her Teachers with at least five years, serving dualification prescribed finitial regruinment of Physical Education
				Leacher!
		··		Provided that if no suitab candidate is available for premotion the on the basis of seniority-cum-fitnes from amongst Senior Primary Scho
				Teachers with at least five years servi
	122 Z.	Ald.	· ·	initial recruitment of Physical Education
-				Note: In case of non-availability of suitab candidate for promotion, then by initiversuitable.
<u>.</u>	Printery School Head		•	By promotion, on the basis of seniority-cus
	Tender (PSFT)			filmers, from amongst Senior Primary Senior Teachers with at least ten years service at having firstification prescribed for and property senior Teacher.
	Senior Printary School Feschera BPS-14).	2 0	-	By promution, on the basis of seniority-cut fitness, from amonest Primary School Teach?

Muhammad Liagai

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		•		with at least live years service as such thaving qualification prescribed for initial recruitment of Primary School Teacher.
21:	Manuary School Teacher	(i) discrincidiae or equivalent qualitication, from a recognized Board with Primary School A exchange an information Education also primare against time; or	j} veas. □	By initial recruitment on merit at Union Com- level: provided that if no suitable candidate within the Union Council is available, then if the adjacent Union Councils on merit.
		(ii) Secondary School Certificate from the secondary School Certificate from the secondary secon		
22.	Qari (BPS-12).	Intermediate with Hife-e-Quan and Quat Sarrad from a recognized Institution;	18 to 35 years.	By initial recruitment.

Muhammad Liagat

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

SCHEDULE

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

Editeditional Qualification SSC	Total Marks; 100
ACC	Marks obtained X 20 / total marks =
BATES:	Morts obvined A 201 roles inspits =
e i Arabie / Staketaruf Aleusia Fil Ulvoniul Arabia wal Jamia Iron a recognized Tantana d	Marks obtained X 19 / votal morely
Toma from a recipration Alamia Fil Victorial Arabia wal ther KENASCHA FILVEN Edu	Marks obtained X 201 total marks =
PAVPAD	Marks obtained X 15 / total marks =
the same of the sa	blocks = 05

Theology Teacher

Calcustral Qualification	Total Marks 100
4650	Murks abjained N 29 / total marks =
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Advocate



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Calegory of Qualification	Total Marks 10h
220	Mearks absoluted X 20/10/ad nowks =
Qiri Sanzel from a recognized . Instintion,	Marks obtained X 20, total marks =
HISC	Maris obtained X20 I intal works
RA/BSc	Marks obtained \$30/solot marks =
MEA/MSE/ M. Ed / MA Edu	Marks obtained X 15 / weal ments
MPhilito	Marks = 05

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

Category of Qualification	Total Marks 100 For Humanliles group at Intermediate Graduation Level	For Candidate of Science group
ESSC	Marks obtained X 201 total marks =	5 Extra nearts for ESc, 5 Extre marks for B. Se'es 5 Extra mains for M. Se will be added in the rot
BA/BSc	Morks obtained X20 total morks w	scare obteditied by a candidate during his selection
	Marks obtained X201 local marks =	
SAMEGISTES / MA FAII WhitePhD	Marks obtained X 15 (total marks =	

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Drawing Master

	The state of the s	For Condidate of Science group
Category of Qualification	Total Marks 100	
'22C	Marks obtained X 20 / total marks =	5 Extro marks for FSe, 3 Extra marks for B.Sc spa 5 Extro marks for M.Sc will be added to the total score abtained by a candidate during his selection
HSSC	Marks obtained X201 solal marks =	senre apianta by Mesting
BA/BSC	Marks obtained X 20 / soled marks 18	
DM Certificate	Marks obtained X20 / total marks =	
MAMSOM Ed / MA Edu	Marks oblained X 15 / Jobs! marks =	
MPhil/PhD	Marks = 05	

Physical Education Teacher

Privical Landauna reacte	the second secon	Par Candidate of Science group
Category of Qualification	Total Marks 100	the for teken 5 theira mucks for B.Sc. and
SSC	Marks obtained x 20 / total marks =	5 Extra marks for M.Sc will be ackied to the total serve obtained by a candidate during his selection
HSSC:	Marks obtained: X 20 / total marks =	senre amounts,
RA/BSc	Marks obtained X 201 total marks =	
JOPE or Equivalent Certificate	Marks obtained N 20 / total marks =	
MA/MSc/M.Ed / M.J. Edu ;	Marks obtained X 15.7 total marks =	
ASPhil/PhD	Merrkx = 0.5	The second secon

Muhammad Liagat



GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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NOTIFICATION

Peshawar, dated the 30th January, 2018.

No.SO(PE)4-5/SSRC/Meeting/2612/Teaching Cadre/2017: 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 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.-

against Scrial No.1, in columns No.3 and 4, for the existing entrics, the following shall be substituted, namely:

3
4
"(i) At least Second Class Bachelor's Degree or four (4) years BS Degree in the relevant subject; and

(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).

against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis.

(a) Chemistry, Botany or Zoology; or

Muhammay Llagat

(c) Humanities and other equivalent groups at degree level with linglish as subject:

nine months in service mandatory professional training at Regional lisatitute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE). l (ii)

against Serial No. 10, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely: (iii)

	3.		19 to 35 years";	
(ii)	At least Second Class Master's Degree in Arabic from a recognized University; or at least Second Class Bachelor's Degree from a recognized University with Shahadatul 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 Government from time to time; and nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	1	A. A	

against Serial No. 11, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

		19 to 35 years";
	3. See See See See See See See See See Se	19 to 33 years,
	At least Second Class Master's Degree in Islamiyat from a recognized University; or School Certificate from a recognized Board with	
1)	At least Second Class Master's Degree in Islamiyat Hour a recognized Board with at least Second Class Secondary School Certificate from a recognized Board with at least Second Class Secondary School Certificate from a recognized Board with at least Second Class Secondary School Certificate from a recognized Board with	
	at least Second Class Secondary School Certificate Holl & Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Wafaqul Mada	
	Shahadatul Alamia from a recognized Talizintiatul Transport of Covernment run Darul Uloom, as notified by	
	Uloom Saidu Sharii Swat, Darui Uloom Charagast run Darui Illoom, as notified by	
	Uloom Saidu Sharif Swat, Darul Uloom Chardagh Swat, Barul Uloom, as notified by Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by	·
	Government from time to time; and	
		•
1)	nine months in service mandatory professional during Teacher Education (PITE). Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	
	Teacher Education (KITE) of Florificial Australia -	

Advocate

Advocate

(ii)

19 to 35 years" Bachelor's Degree from a recognized University and Qirat Sanad from registered (i) Institution; and nine months in service mandatory professional training at Regional Institute for Teacher (ii) Education (RITE) or Provincial Institute for Teacher Education (PITE).

> SECRETARYTO GOVERNMENT OF KHYBER PAKHTUNKHWA **ELEMENTARY & SECONDARY EDUCATION** DEPARTMENT.

Endst: of even No & date:

- The Secretary to Government of Khyper Pakhtunkhwa, Establishment and Administration Department Peshawar.
- 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, 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 (E&SE) Department Khyber Pakhtunkhwa Peshawar.
- 43: All District Education Officers (M&F) in Khyber Pakhtunkhwa.
- 14. All District Accounts Officers in Khyber Pakhtunkhwa.
- 15. All Agency Education Officers/ Agency Accounts Officers in FATA.
- 16. PS to Governor Khyber Pakhtunkhwa. Peshawar.
- 17. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
- 18. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
- 19. PS to Minister E&SÉ Khyber Pakhtunkhwa. Peshawar.
- 20. PS to Secretary E&SE Khyber Pakhtunkhwa Peshawar.

SECTION OFFICER (Primary)

Annx H"

Advocate.

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAR



No. 3052 /ADEO LEI

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0992-9310102, 0992-330131

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EDO. Education, Add agunil.com

To

- 1. Mr. Muhammad Kaleem GPS Thora Kalan District Abbottabad.
- 2. Mv. Qadeer Ahmad GPS Batangi, District Abbottabad.
- 3. Mr. Muhammad Tariq GPS Lora, District Abbottabad.
- 4. Mr. Ageei Ahmed GPS Tarar, District Abbottabad.
- 5. Mr. Muhammad Zaheer GPS Goreeni, District Abbottabad.
- 6. Mr. Mujeeb-ur-Rehman GPS Goreeni, District Abbottabad.
- 7. Mr. Mir Baz Khan Fetch, District Abbottabad.
- 8. Mr. Muhammad Iqbal GPS No. 4, District Abbottabad.
- 9. Mr. Rab Nawaz
- 10. Mr. Imtiaz Khan
- 11. Mr. Muhammad Javed
- 12. Mr. Khawaja Waqor GPS Dara Aman, District Abbottabad.
- 13. Mr. Sajid Mehmood
- 14. Mr. Mubarak Ali
- 15. Mr. Safdar Hussain
- 16. Mr. Nusrat Iqbal GPS Thana Karamshah, District Abbottabad.
- 17. Mr. Zahoor Ahmed GPS Mora Changra, District Abbottabad.
- 18. Mr. Shafique GPS Chehr, District Abbottabad.

Subject: DECISION ON DEPARTMENTAL REPRESENTATIONS IN THE LIGHT OF JUDGMENT DATED 26-09-2019 PASSED IN WP NO. 1008-A/2019 TITLED MUHAMMAD KALEEM & OTHERS VS GOVT OF KHYBER PAKHTUNKHWA & OTHERS

In pursuance to the judgment of Honourable Peshawar High Court Abbottabad Bench Passed in WP No. 1008-A/2019 dated 26-09-2019, undersigned examined the case of the petitioners thoroughly.

In view of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, petitioners do not fulfill the requisite eligibility criteria for promotion, hence, departmental representations of petitioners are hereby rejected accordingly.

District Education Officer (M)

Copy forwarded for information to the:-

- 1. Additional Registrar Peshawar High Court Abbottabad Bench with reference to above referred Writ Petition.
- 2. PA to Deputy Secretary (Legal) E&SED, Khyber Pakhtunkhwa, Peshawar,

->a-District Education Officer (M) Q_Abbottabad. REGISTERED POST MOST URGENT BEING COURT MATTER

DEFICE OF THE DISTRICT EDUCATION OFFICER (M)



No. 1124/ (ADEO(Lit) Dated: / 10/2019

0992-9310102, 0992-330131

EDO Education Atd@gmail.com

To

The Director,

E&SE Khyber Pakhtunkhwa,

Peshawar.

Subject:

DECISION ON DEPARTMENTAL REPRESENTATIONS IN THE LIGHT OF JUDGMENT DATED 26-09-2019 PASSED IN WP NO. 1008-A/2019 TITLED PAKHTUNKHWA & OTHERS. GOVT.

It is submitted that Petitioners filed WP No. 1008-A/2019 before the Honourable Peshawar High Court Abbottabad Bench to effect that the petitioners are eligible for promotion from SPST (BPS-14) to PSHT (BPS-15) as per Policy 2013, but the respondents are not promoting the petitioners from the post of SPST to PSHT due to the new Recruitment Rules/Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, wherein, for qualification for upgradation for PSHT is B.A whereas, in the Policy of 2013 the qualification for promotion was F.A and Honourable Peshawar High Court Abbottabad Bench passed the judgment dated 26-09-2019 in the above referred Writ Petition and the operative part of the judgment is reproduced as under:

"In view of the peculiar facts and circumstances of the present writ petition, this Court in the larger interest of justice, and in the light of case law reported as 2017 PLC (C.S), 692 and 2004 PLC (C.S) 1240, treats the present petition as departmental representation/s of the petitioners with directions to respondent/department to consider the grievance of petitioners and decide the matter, strictly in accordance with the law, within statutory period and decisions so made be also communicated to the petitioners. In case the petitioners find themselves still aggrieved after the receipt of reply or if no reply is received, the petitioners may approach the competent forum for the redressal of their grievance." (Attested copy of judgment attached)

Furthermore, legal notice No 0005 dated 07-10-2019 was also received to this office from the office of Muhammad Liaqat Advocate High Court Abbottabad regarding the

It is, therefore, your gracious honour is requested to refer the instant case to worthy Secretary E&SE for appropriate decision.

District Education Officer (IM)

OK X Abbottabad

Dated:

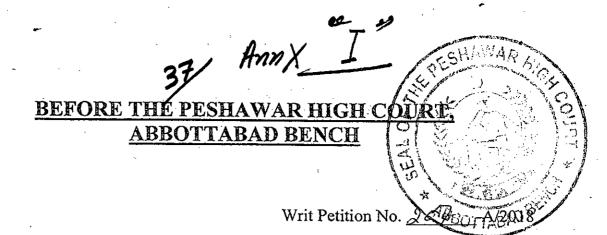
Endst: No. 1/24

Copy forwarded for information to the:

PA to Deputy Secretary (Legal) E&SED Khyber Pakhtunkhwa, Peshawar.

District Education Officer (M)

Abbottabad



Muhammad Ali son of Muhammad Manzoor, resident of Dheri Kiala, Lora, Union Council Lora, Tehsil Havelian, District Abbottabad.

...PETITIONER

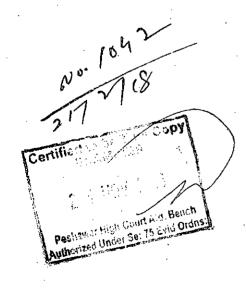
VERSUS

Much mad Liagat Advocate

District Education Officer (Male) District Abbottabad.

- 2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar.

... RESPONDENTS



WRIT PETITION UNDER ARTICLE 199 OF REPUBLIC OF **ISLAMIC** CONSTITUTION OF PAKISTAN, 1973, FOR ISSUANCE OF A DECLARATION **PETITIONER** BEING THE EFFECT THAT TO **PASSED** NTS **HAVING QUALIFIED** AND EXAMINATION WAS ENTITLED TO BE APPOINTED AS PST IN GPS NAGRI TUTIAL UNION COUNCIL NAGRI TUTIAL OR GPS RAHI UNION COUNCIL PHALLAH AS PER CLAUSE 1 OF ADVERTISEMENT PUBLISHED BY RESPONDENTS AND REFUSAL OF

2 38

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A'
FORM OF ORDER SHEET

		•
Date of Order	ORDER OR PROCEEDINGS WITH SIGNATURE OF	V." I
or Proceedings	JUDGE/JUDGES *	
1	100 mm	read of the same o
07.11.2018	W.P No. 207-A/2018.	
07.11.2010	77.1 110. 207-A/2018.	
	Present:- Mr. Awais Abbasi, Advocate for the petitioner.	
	Sardar Muhammad Asif, AAG for the respondents.	TX.
	<u> </u>	nmad Llagat
	SYED MUHAMMAD ATTIQUE SHAH, J Petitioner	•
	Muhammad Ali has invoked the constitutional jurisdiction	, .
	of this court praying that:-	•
Too United Sec. 12 Sec. 10	"On acceptance of this writ petition, the respondents may graciously be directed to forthwith issue appointment order of the petitioner on the post of PST (BPS-12) with immediate effect in GPS Nagri Tutial Union Council Nagri Tutial or GPS Rahi Union Council Phalla. Any other relief as may be deemed fit and proper in the circumstances of the case."	
	2. In essence, the case of petitioner is that as per	
-	Clause-I of the advertisement dated 30.08.2016, when no	•
₽	candidate was available in the concerned union council,	
	then the candidate from adjacent union council was to be	
2	considered and since the petitioner was hailing from the	

adjacent union council, therefore, he was required to have been appointed on the subject post.

- and contested the petition by filing their para-wise comments wherein they have relied upon the notification dated 30.01.2018 whereby amendment was made against Serial No. 1 in column No. 3 & 4 of the appendix to Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and submitted that the petitioner was not having the requisite qualification for his appointment.
- Arguments heard and record perused.
- 5. Perusal of record reveals that the respondents advertised posts of PST through advertisement dated 30.08.2016, wherein it has clearly been mentioned in clause-I of terms and conditions of advertisement that when a candidate in the concerned union council is not available, then the candidate from the adjacent union council would be considered. It is very much clear from the record as well as comments filed by the respondents that the petitioner fulfill the criteria for his appointment against the subject post.
- 6. So far as the contention of the respondents that in the light of notification No. SO (PE)4-5SSRC/Meeting/2012/Teaching Cadre/2017 dated 30.01.2018, the petitioner was lacking the requisite

Muhammad Liaqat

Cobal

qualification, is concerned, suffice it to mention that in advertisement dated 30.08.2016, the respondents advertised certain posts of Primary School Teacher (PST) and the requisite qualification for the said post was mentioned in the advertisement as Intermediate or equivalent certificate from any recognized board along with Primary School Teacher Certificate or SSC Second division along with two years Associate Degree in Education from any recognized University. Consequent to the said advertisement, several candidates including the petitioner, having qualification upto intermediate, have applied for the said post and appeared in the screening test and some of them having the same qualification, were also appointed against the vacant posts after qualifying the test and interview. Moreover, the advertisement was issued on 31.08.2016 and consequent thereof, the appointments were made on 10.04.2017, whereas the amendment in the rules through the ibid notification was made on 30.01.2018. There is no mention in the notification dated 30.01.2018 that the same would have retrospective effect, therefore, the petitioner carrying the qualification mentioned in the advertisement, would not be subject to the ibid amendment and the respondents without any whim and reason have refused to appoint him which is otherwise against the very terms and conditions of their advertisement.

Munar dvocate

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7. Resultantly, while accepting this writ petition, we direct the respondent No. 1 to consider the petitioner for his appointment against the subject post in accordance with law.

Announced. 07.11.2018

JUDGE

J'U D Ğ E

Certification to the True Copy

Pachaviar High Court Atd. Bench

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Let or

Muhammad Liagat

Tufail/*

Hon'ble Justices Lal Jan Khattak & Syed Muhammad Attique Shah

12 ANNEXURE T 36

FDIRECTOTCATIF OF BLIGHTEN AYDLAY & SUCCEMDARY DOCATION DEPARTMENT KINYURU PAKTITINKI MA PULDYI 927536/Lot (VI 92558) Emply zullagazulmatk@ain@logn

Doied / 72010.

ं Neon: Government ShoheedHussnain-Sherif Illahai Setgg dar sehpalike-1 Chy Peshavian

MINOTES OF THE OPEC MEETING WITH DEOS (NEWF) ON MAY 08, 2018.

Vanue i de Committee room Directorale of ERSE KP. Pachaval. 1

Timing \$200,000 AM to 04.00 PM;

Chaired Bynsalds Faildtkhattakiolitetion E85E Kistremawar

Patticipanis zajyvattachod



Proceedings

Ameeling viss held on 08/05/2018; ar Committee coom of PRSE KP. Peshavia: The meetlog

Was chaired by Mr. Hand Abhad khallak Diestor E&SERP, Peshawar local office. The meeting

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e participants discussed the following agendatiems & agreed upon the Tollowing points:

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and the state of t	s oʻconstavte iocal committee	
\$	ichairna stip and ensure the foelunded the said heads up to 30.	
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DIRECTORATE OF BURMENATRAY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKITTUNKHWA PH: 091-9225344/Fox: 091-9225345 Emoil: 2010norulingth@qimall.com

Near: Government ShaheedHussnain Sharif Higher Secondary School No-1 City Peshawar.

MINUTES OF THE DPEC MEETING WITH DEOS (M&F) ON May 08, 2018

Venue Committee room Directorate of E&SE KP, Peshawar 109:00 AM to 04:00 PM

Chaired By: Mr. Farid Khattak Duector E&SE KP Peshawar

Participants: List Attached

LA CONTRACTOR SECTION

A meeting was held on 08/05/2018 at Committee room of E&SE KP, Peshawar. The meeting was chaired by Mr. Farid Ahmad Khattak Director E&SE KP, Peshawar local office. The meeting started with the recitation from the holy Qurant

The participants discussed the following agenda items & agreed upon the following points:

٠.	14 C 711 4	TAX - Michael Colors and Colors and		3, 40
	اچوراو نیات این ا	Activity with the	Decisions The Control of the Control	Responsibility
1	4	Construction of	The chair directed DEOs concerned to construct group	
į	* X 14	Group Catrines for	latines long for gris' schools) under CG 2017-18 as	
	$\{j_i\}_{i=1}^{n}$	Girls Students	Fai the decision of Secretary ESSE in the light of coun	
. }	.,	under Conditional	decision. Work on the rest of schemes/facilities must	DEOs
		'Grant 2017- 18	not be started till the decision of socio-engineering) <u> </u>
	-	Change 20 (17 (0,	team to the second seco	** , , ,
	, ,		The chair shared the grievance of worthy Secretary	in the same of the
	3.0	The second second	E3SE regarding pending lackales under CG 2014-15;	
	9.0	Fig. 19 - The second	2015, 16 & 2016-17 on which work still not completed	
	F 2. 18	Parama institut	He also directed DDU team to share the ast of pending	Article With the
		Penging tricilities	lacishes with concern DEOs and also a copy of a may	DDU team
4	· • 6 · ·		also be provided to the chair. The chairs further	DEOs.
4		2015-16 & 2016-17	directed the concerned DEOs to provide school vise	ALCOHOLOS A
J			lists of pending factives & complete all such pending	
ij			factives and work on such facilities may also be	
	Î.	14 15 . 15 . 15 . 15 .	monacred on weekly basis	
1			The chair was informed by a few DEOs that their ?	
Ĵ,	2 4 2		respective Deputy Commissioners are not willing to	
-		Purchase of	convene the purchase commiltee meetings for the	
4		Science Equipment	purchase of Science Equipment, F&F and IT	
ł	3	ifor Schools, F&F, 🐣	barroman for party services and the	
. [IT Equipment for	equipment for newly established SDEOs offices. The	DEOs
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	nevily created 📆 🗍	chair grected DEOs to constitute local committee	
J	7	SDEOs Offices	Under their personal chairmanship and ensure the	
ì	法实出	的。这种是中国的	utilization of the budget under the said heads up to 30	
i	** Y **	Activities of the fit of the	May 2018 (The taiget get was set by all the DEOs)	
4	33 X Y Y	2 3 May 1 1 1 2 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1	The Part of the Control of the Contr	

Noic All employees E&SE departments outer interested ones, please type Follow Dir ESE RP yourmobile message &send it to 510104 to get free tweets of Directorate of E&SE RP Peshawar on y mobile

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DIRECTORATE OF ELEMENATRAY & SECONDARY EDUCATION DEPARTMENT KITYBER PAKITUNKITWA PR. 091-9225344/Fax: 091-9225345 Eminth: 1011/0001011milks@nmail.com

		191-9225344/Fax 091-9225345 Eniall: xolligarota	uiksynmail cam	
		Nn Dated 1 777	716	
	Med Coleman	Shelles de Campagna de la compagna d		aide (a
	1			
		I had chair directed the DEOs to shall the facult modes		
·		is the king of leachers (only) in Autonomy business of 1935 to	k J	
35: 34		(The FIC accounts of the respective school to be	• •	•
		ublized on need basis linough PYCs afterwards in the)	
	Autonomy of HSS	new session only for the same purpose of iming. Chair	DEOs	. I 6
		also directed the DEOs to conduct weekly meeting with	2203	H,
į		concerned principals of GHSSalGGHSSa to discuss	•	. <u>M</u>
<u>.</u>	•	the issues in the utilization of butonomy budget and its		
40.00		resolution.	Militar.	A V
	Release of	It was revealed that aloosi 70 to of the budget under		. 179
1.	Remaining 25%	Non-Salary head have been useded mereiore the chair.		:
1.):5	proget most hon-	directed DEOs to write a letter to thair respective DO	250	
j · - · · ·	Solary head.	TRP: for the release of remaining 25% budges	9EQs	:
	1. 001017 11536.	i-immediately	:	:
<u>}</u>		As per the direction of the Secretary E&SE interestion		<u>'</u>
		most this head is spanningly low toticions as ost		;
1	Dettermen	decision of the Secretary ESSE the chair further		<u> </u>
	Utilization of Conveyance	directed DEOs to stromit & clear all the pending bills	<i>:</i>	•
. S .		mondales for device of the sentent one		
. · · · ·	Charges for	mmedialery & in future submits all such bits along with relevant documents to the account offices up to 5° of	DEGs	!
: :	Female ASDEOs.	search would for cleanaires. This pais of brealors would have a search would be searched outside ab to 2, of		
] , "		til not cleared for any reason; shall not be paid to the		•
	į	ASCEOS alterwards .		
	Annual or and the second of the second or and th	if was revealed in the meeting that some DEOs have	ه	•
Į ,		restres on part of DC office DO (FSP) and Distret	;	:
į	Reporting et issues.	Govi, with reference to the proget execution in this	•	
. 7	्राध्यभवास्य प्रम्पद्रमः	legard the Deputy Orector PSD suggested that they		
	execution to	sportguebott anch issues melt to time to gundloste in	DEO:	
	i Directorale	a series to purple services of the first form \$0.0000 is in		
i		octás to tachie such issues immediatory ai proper forums.		•
	Andrew Control of the	The Contraction of the Contracti	en a treep mages and a color	٠
]		Regarding PC-1 for developmental schemes Deputy	****	
} '€'	GPS Coordinates	Director PSD suggested the DSDs to send GPS		<u>.</u>
-\$	for developmental	doordmalest GIS map location with PCH for proper	0805	-
	schemes	ventication of the proposed site Sample GPS	od pao	
		coordinates OIS map sheet will be shared with all-		
	-	DEOs vio email.	•	•
	<u> </u>	All the DEOs (Male & Female) directed to provide	س دود سیان سے بلیسی فیشفدسفیشف سید	٦
ė.	Vacant Posttons	vacant position of all cadres & data regarding	en en	
ļ ;	i i romant lossedes, · ·	retirement of personnel from 1" April 2018 to 36"	DEOs	
		September 2018) of each cadre with proper school	054 QQ	٠.
ļ- -	<u></u>	wise STR must be sent ASAP	· !	:
· <u></u> .		The Chair directed the DEOs that the promotions	and in the other dates of a second contract of the second	7
10	d Oramoliska	cases of PST to SPSTarPSHTs must be entertained	•	
	Promobons	according to the previous policy of promotion while	DECS	9
[2,5,3]		new rules are to be applied for new	• • •	ř.

Note: All employees EESE department & either interested ones, pludse type Follow Dir ESE KP" in reumselule massage Seenil It to "10101" to get free tweets of Directorate of ESSE KP Peshawar on your

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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA PH:091-9225344/Fax 091-9225345 Email: zulfigarulmalik@gmail.com

NEAR GOVERNMENT SHAHEED HUSSAIN SAIF HIGHER SECONDARY SCHOOL NO. -3 CITY PESHAWAR.

- 2	Autonomy of HSS	The Chair directed the DEO Lie	-,
	() () () () () () () ()	The Chair directed the DEOs shift the founds under	DEOs
:		hiring of teachers fondly in Autonomy budget of	
<u> </u>		HSS to the PTC accounts of the respective school to	
Ì		utilized on need basis through PTCs afterwards in	
ĺ		the new session only for the same purpose of hiring	
Ì		chair also directed the DEOs to conduct weekly	
		meeting with concerned principals of GHSS and	
		GGHSSSs to discuss the the agues in the mutation	
<u> </u>		of autonomy budget and is resolution	
5	i reality	It was fevered that their prost to the budget under	DEOs
	† 25% budget under	non salary have been utilized therefore the other	0203
	non salary head	directed DEOs to write a letter to their respective	
		DO (F&P) for the release of remaining 25% budget	
		immediately.	
6	Utilization of	As per the direction of secretary E&SE utilization	
	conveyance chaiges	under this head is alarminated to	DEOs
	for femile asdeos	under this head is alarmingly low therefore as set	
	, , , , , ,	per decision of the secretary E&SE the Chair further	
İ		directed DEOs to submit &their all pending bills	
		immediately and in future submits all such bills	r
		along with relevant documents to teh account	
	• • • • • • • • • • • • • • • • • • •	offices up to 5th of each month for clearance the	
		bills of previous month not cleared for any reason	
! 	ļ	not be paid to the ASDEOs afterwards	
7	Reporting of ussues	It was rayagled in the	DEOs
	regarding budget	ussues on part of DC office DOE&P and District Govt	DEOS
	execution to	with refrence to the execution with this regard the	
	directorate	deputy Director PSD suggested that they should	
r		report such isues within time to directorate in order	,
	,	to such issues well immediately at proper forums.	
8	GPS coordinates for	Pagarding BC (fam devel	
	developmental	Director P&D suggested the DEPs to the Open	DEOs
	l schemes	Director P&D suggested the DEPs to sent GPS	DD P
		coordinates GIS map location with PC 1 for proper	&D
		verification of the proposed site sample GPS	
•		coordinates GIS map sheet will be shared with all	
	Varant D	DEOs by email	
	Vacant Positions	All the DEOs (Male & Female directed to provide [DEOs
		vacunt position of all cadres & cata regarding 2	DD P
	1	retirement of persons from 1st April 2018 to 30th 8	₿D
		September 2018 mst be sent ASAP	
10	Promotions	The Chair disease of the DEC	DEOs
i		cases of PST to SPSTs, PSHTs must be entertained	,203
		according to the previous policy of promotion while	
		new rules are to be applied for new induction	.
}	,	recruitment.	
		Teororicit.	

Note:

All employees E&SE department & other interested please type "Follow Dir_ESE_KP" your mabile massage and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.



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DIRECTORATE OF ELEMENTARY S. SECONDARY DUCATION DEPARTMENT KHYBER PAKHTUNKHWA PH:091-9225344/Fax 091-9225345 Email: zulfigarulmalik@gmail.com

NEAR GOVERNMENT SHAHEED HUGSAIN SAIF HIGHER SECONDARY SCHOOL NO. -1 CITY PESHAWAR.

	<u></u>		
4	NTS appointments Teachers	The Chair directed to implement wedlock policy regarding transfer of employee appointed through NTS in addition to mutually transfers and agency as per rules and regulations already notified.	
5	Late time school Visit	DEOs to ensure surprise visit of schools after the duty hour to provincial un authorize of shcool buildings assurance.	DEOs
	Communication with District Official	Chair Directed DEGs to respond the official calls/SMS Emails within the duty hours as well as after the close of business all of them must follow the official whatsapp group and not to quite if the officials are advised to use the official whatsapp group for only relevant contents /communication	DEOs
7	Scout	DEOs are directed not to follow the orders/instruction/ suggestions of personal not related to the E&SE department regarding scout activities.	DEOs
l	Social mean communication	With refrance of the S directive all the DEOs(M&F) directed to creat their official district level face book & twitter accounts update them regularly and share and share their prior this along with details of fact person with DDP&D immediately	DEOs DD P &D

Deputy director (P&D E&SE Khyber Pakhtunkhwa

Endst No	_ Meeting minutes/DPES-1,	/dated
Copies commun	icated to:	

- 1. PS to Director Local Office
- 2. All the DEOs (M&F for information & proper compliance)
- 3. Office file

Deputy director (P&D E&SE Khyber Pakhtunkhwa

Note:

All employees E&SE department & other interested please type "Follow Dir_ESE_KP" your mobile massage and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.

ICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

The Committees comprising the following officers/officials is hereby constituted to examine, check and scrutinize the documents regarding promotion from PST to SPST, SPST to PSHT, PSHT to CT, PET & DM and recommend the name of eligible candidates for promotion.

Committee	Name of Officer	Designation	Cadre	Date of Scrutiny	Place of Scrutiny
1.	Babu Jehangir	SDEO(M) Abbottabad	PST to SPST	01-3/10/2019	DEO (M) Office Atd
	Muhammad Naseer	SDEO(M) Lora	-do-	-do-	•do-
	Zaheer Ahmed Qureshi	Superintendent			
	Nagash Khan	ASDEO Circle Abbottabad	-do-	-do-	-do-
	Muhammad Bashir	Assistant	-do-	-do-	-do-
2.	Abdul Qayyum	SDEO(M) Havelian	SPST to PSHT	-do-	-do-
	Arshad Mehmood	ADEO (E) Primary			
	Syed Mehmood ul Hassan	ASDEO Circle Havelian	-do-	-do-	-do∙
	Muhammad Saeed	B&AO Local Office	-00-	-do-	-do-
	Asif Khan	ASDEO Circle Dhamtour	-do-	-do-	-do-
	Muhammad Zaman	Assistant Local Office	-do-	-qo∙	-do-
3	Mahroof Khan	SDEO(M) Lower Tanawal	PSHT to CT, DM, PET	-do-	-do-
	Zubair Ali	ASDEO Circle P.K.Khan	-do-	-do-	-do-
	Irshad Ali	ASDEO Circle Nathia Gali	-do-	-do-	·do·
	Rabnawaz Khan	ADEO (E) Secondary	-do-	-do-	-do-
	Aceel Khan	J/C Local Office	-do-	-do-	·do-

Note: All the ASDEOs Circle are directed to be present during the scrutiny of documents during the τύονε period.

Endst: No. 1069 Promotion SPST to PSHT

DISTRICT EDUCATION OFFICER (M)

ABBOTTABAD

Dated 7.6 G /2019

Copy forwarded to the:-

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar 1.

Deputy District Education Officer (M) Local Office, 2.

All the Member of Committee.

DISTRICT EDUCATION OFFICER (M) TABBOTTABAD

وكالت تامم

بعدالت من سروس شريع الم المراك ور عنوان: حسب الركال بنام كور أن الله على دير مناب: ريسلان المراي ن

نوعيت مقدمه:

باعث تحريراً نكه 🗽

مقدمه مندرجه میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

- Endiles 200, 200 — ie Wi

کودکیل مقرر کر کے اقر ارکرتا ہوں کہ صاحب موصوف کومقدمہ کی کل کا روائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ وتقرر ثالث و فیصلہ برحلف ودینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روییہ وعرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ ندکور کی کل پاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختہ مجھ کومنظور و قبول ہوگا۔دوران مقدمہ جوخر چہ وہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہویا حد ہے باہر ہوتو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابندنہ ہوں گے۔نیز درخواست بمراداستجارت نالش بصیغہ مفلسی کے دائر کرنے اوراس کی

Accepted

پیردی کا بھی صاحب موصوف کوا ختیار ہوگا۔ لبذاوكالت نامة حرير كردياتا كدسندرب_ 13/01/2016 Allenda