

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.*

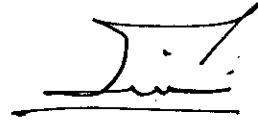


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

13.10.2021

Nemo for the appellant.

Previous date was changed on Reader Note, therefore, notice for prosecution ~~of 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

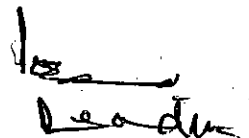
None present on behalf of the appellant. Notices be issued to appellant as well as his counsel for next date. Case to come up for preliminary hearing on 16.02.2022 before S.B at camp court, Abbottabad.



Chairman
Camp Court, A/Abad

16-2-22.

Due to retirement of chairman the
tribunal is non functional. To come up for
the same on 20/2/22, at camp court
Abbabad.

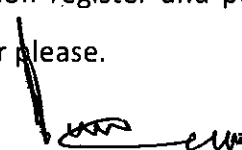
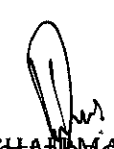


Reader

Form- A

FORM OF ORDER SHEET

Court of _____
 Case No. 1629 /2021


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.01.2020	<p>The present appeal was returned to the counsel for the appellant for completion and resubmission today i.e. on 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 the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	18.06.2021	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on 18-06-2021</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 13.10.2021.</p> <p style="text-align: right;">Reader</p>

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.

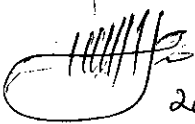
No. 210 /S.T,

Dt. 21-01 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Liaqat Adv.
High Court Abbottabad.

All above objection removed and file
re submitted Please -


26-01-2021

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

1629
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

INDEX

S #	Description	Page No's	Annexures
1	Service appeal alongwith Affidavit	01 to 06	
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 to 15	"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	"I"
8	Copy of minutes of the meeting dated 08-05-2018	42 to 45	"J"
10	Wakalatnama	46	

Dated: 13/01/2020

Through

Abbas
.....APPELLANT
(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

/

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

1629
Appeal No. /2020

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

.....APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 620

Date 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 REPRESENTATION 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

Filed to-day

Registrar

20/01/2020

2/

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 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 inter-alia on the following amongst many others:-

GROUND:-

- 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 18-12-2019 is liable to be set aside on this score alone.
- h) That the valuable rights of the appellant are involved.

- 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

Abbas
....APPELLANT

Through

Muhammad Liaqat
(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.

Abbas
....APPELLANT

6/

**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

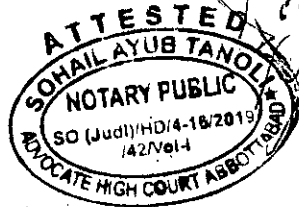
.....RESPONDENTS

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.

Abbas
DEPONENT



7/

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.

- ~~8/~~
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

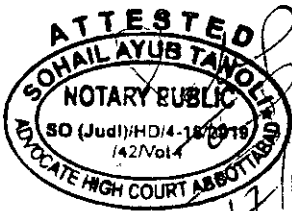
Abbasi
....APPELLANT

Through

Muhammad Liaqat
(Muhammad 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.



Abbasi
DEPONENT

9

Annex A

OFFICE OF THE DISTRICT EDUCATION OFFICER, MALAKAND DISTRICT

Office Order No. 39 / P.T./PT.
Dated A. Abal 1st 8 / 1/198

APPOINTMENT.

As Approved by the Chairman District Board, Malakand District

The appointments of the following candidates are hereby ordered as P.T. Teachers in Basic Pay Scale-(Rs. 750-31-1000) P.T. Fixed plus usual allowances as admissible under the rules in schools as noted against each in the interest of Public Service to 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 Malakand (Goreeni)	GPS. Nagri Tutial	-do-
2	Wagir S/O Abdul Jabbar R/O Nowshera (Tajwal)	GPS. Nagri Tutial	-do-
3	Mohd Saleem S/O Sher 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 Jakkar Bagh (Nagri Bala)	GPS. Nakar Mujwal	-do-
6	Sarfraz S/O Mir Dad R/O Tatreela (Nagri Bala)	GPS. Danna Daria	-do-
7	Naseer Ahmed S/O Mohd Sadiq R/O Tatreela (Nagri Bala)	GPS. Gula Bhan	-do-
8	Muhammad Sultan S/O Aziz ur Rehman R/O Nagri Bala	GPS. Nakar Pakhu	-do-
9	Haroonur Rashid S/O Mohd Ashraf R/O Namli Maira	GPS. Kutli (Phalkota)	-do-
10	Anwar Zaib S/O Aurangzaib R/O Namli Maira	GPS. Malkote	-do-
11	Mohd Yousuf S/O Mohd Yaqub R/O Sumanar (atha)	GPS. Danna	-do-
12	Mohd Qaddus S/O Abdul Ghafar R/O Tajwal	GMS. Surjal	-do-
13	Bildar S/O Abdul Ghaffar R/O Kaghien U/C Tajwal.	G. S. Taghan	-do-
14	Shah Zaman S/O Gulab Khan R/O Nagri Tutial	GPS. Ikalmool	-do-
15	Javid S/O Abdul Qallus R/O Pasala	GPS. Danna Surjal	-do-
16	Mohd Banaras S/O Khani Zaman R/O Nakar (Bagh)	Mos: Dakhan Khan Balan	-do-
17	Mohd Ishaq S/O Mohd Ajab R/O Jhaffar	GPS. Jogimar	-do-
18	Mohd Sabir S/O Mohd Sadiq R/O Maloo	GpS. Majoth	-do-

Better Copy

9A

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

Office Order No. 39/PTC/PT
Dated A.Abott the 8/11/1989

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 Tutial	-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.	Naseer Ahmad S/o Mohd Saddiq R/o Tatreela Nagri Bala)	GPS Kala Bhan	-do-
8.	Muhammad Sultan S/o Aziz-ur-Rehman R/o Nagri Bala	GPS Nakkar Pakhu	-do-
9.	Haroonur Rashid S/o Mohd Ashrif R/o Namli Maria	GPS Kutli (Phalola)	-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-

12/ Annex D

**BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH**



**Dist. Govt. NWFP-Provincial
District Accounts Office Abbotabad
Monthly Salary Statement (November-2019)**

(10)

Annex B



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

Personnel Number: 00014348 CNIC: 1310108744515 NTN:
Date of Birth: 14.02.1971 Entry into Govt. Service: 18.11.1989 Length of Service: 30 Years 00 Months 014 Days

Employment Category: Active Temporary

Designation: SENIOR PRIMARY SCHOOL TEA 80667879-DISTRICT GOVERNMENT KHYBE

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

Wage type		Amount	Wage type		Amount
0001	Basic Pay	38,580.00	1000	House Rent Allowance	2,214.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	800.00	2199	Adhoc Relief Allow @10%	564.00
2211	Adhoc Relief All 2016 10%	3,036.00	2224	Adhoc Relief All 2017 10%	3,858.00
2247	Adhoc Relief All 2018 10%	3,858.00	2264	Adhoc Relief All 2019 10%	3,858.00

Deductions - General

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-2,620.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-445.00	3990	Emp. Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	550,000.00	-15,278.00	519,444.00

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

Payee Name: MUJIB UR REHMAN

Account Number: 4126-9

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

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: ABBOTTABAD

Temp. Address:

City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Email: mujeeburrehmanabbasi786@gmail.com

AA-efed
Muhammad Liqat
Muhammad Liqat
Advocate

11

387830151



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION ABBOTTABAD

Khyber Pakhtunkhwa (Pakistan)

Annex "C"

PROVISIONAL & DETAILED MARKS CERTIFICATE

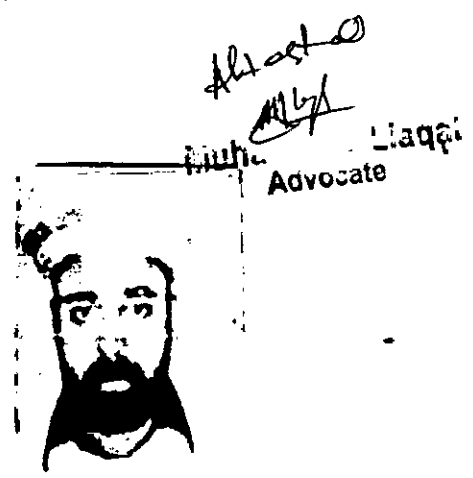
Roll No: 87830

Group: HUMANITIES

Part - II

Session: 2015 (Annual)

Name: MUJIB UR REHMAN
Father Name: MUHAMMAD SABIR KHAN
Reg No: 8237AB/AD-in/MP14
Institution/
District: 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.

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	39	--	36	--	75	Seventy-Five
Urdu (Comp)	200	42	--	45	--	87	Eighty-Seven
Islamic Compulsory	50	20	--	--	--	20	Twenty Only
Pakistan Studies	50	--	--	36	--	36	Thirty-Six
Islamic History	200	62	--	48	--	110	One Hundred Ten Only
Civics	200	65	--	63	--	128	One Hundred Twenty-Eight
Islamic Elective	200	74	--	52	--	126	One Hundred Twenty-Six

Total: 1100

582-C Five Hundred Eighty-Two Only

Date: 06 August, 2015

Remarks :

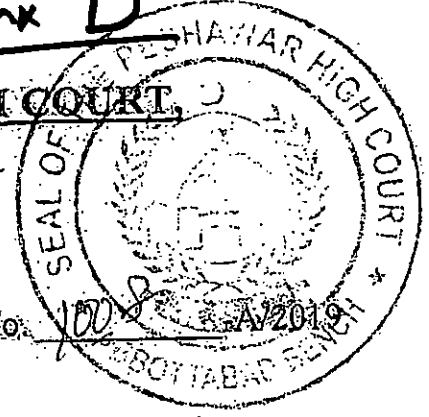
Checked By:

Controller of Examinations

12/

Annex "D"

**BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH**



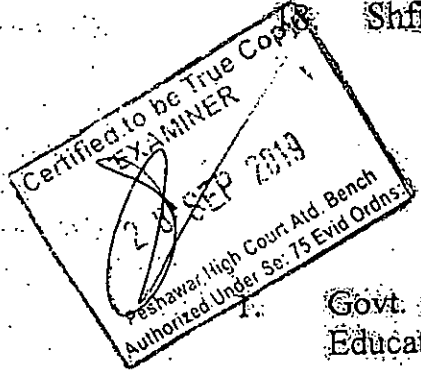
Writ Petition No. 1008 A/2019

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

Attached
Muhammad Liaqat
Adv

...PETITIONERS

VERSUS



1. Govt. of Khyber Pakhtunkhwa, Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Abbottabad.
4. District Account Officer, Abbottabad.

...RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF 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 QUALIFICATION FOR UP-GRADATION/ PROMOTION FOR PHST IS BA WHEREAS, IN THE OLD POLICY OF 2013 THE QUALIFICATION FOR PROMOTION TO THE SAID IS FA, HENCE THE PETITIONERS ARE ELIGIBLE TO BE PROMOTED AS PHST BPS-15 AS PER POLICY 2013.



Attest
Muhammad Liaqat
 Advocate

Certified to be True Copy
 EXAMINER
 23 SEP 2019
 Peshawar High Court Atd. Bench
 Authorized Under Sec. 75 Evid Ordns.

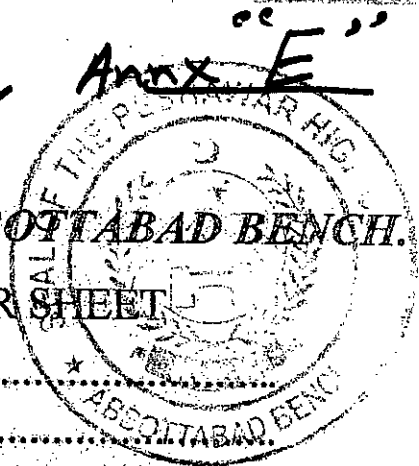
PRAYER: ON ACCEPTANCE OF THE INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO UP-GRADE/ PROMOTE THE PETITIONERS

28/14

Annex "E"

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET



Court of.....

Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
26.09.2019	<p><u>WP No. 1008-A/2019.</u></p> <p>Present: Mr. Muhammad Arshad Khan Tanoli, Advocate for petitioners. ***</p> <p><u>IJAZ ANWAR, J.</u> Through this petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioners Muhammad Kaleem & seventeen others have made the following prayer:-</p> <p style="text-align: center;"><i>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.</i></p> <p>2. At the very outset, learned counsel for petitioners when confronted that the question raised in the instant writ petition relates to the terms and conditions of service he stated that petitioners would not press this petition anymore, if this writ petition is converted into departmental representation/s and send the same to the respondent/department for its decision.</p> <p>3. In view of the peculiar facts and circumstances of</p>

Handwritten signature and stamp of Muhammad Liaqat, Advocate.

Stamp: Certified to be True Copy. Peshawar High Court, Abbottabad Bench. Authorized Under Section 15 Evid Ordns.

Handwritten signature at the bottom left of the table.

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
 Muhan Liaqat
 Advocate

Sd/ JUDGE
 Sd/ JUDGE

Certified to be True Copy
 17 SEP 2019
 Peshawar High Court, Peshawar
 Authorised Under Section 75 Evid Ordinance

ANNEXURE 16
" F "

ANNEXURE

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/15/SSRC/Meeting/2012/Teaching Cadre. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Service (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Encl. No. & Date as above

Copy forwarded to:-

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

Muhammad Liaqat
Muhammad Liaqat
Advocate


Muhammad Liaqat
Advocate

17

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


Section Officer (Primary)

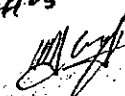
Muhammad Liaqat
Advocate

Attested

Muhammad Liaqat
Advocate

APPENDIX

18


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

Attest


Muhammad Liaqat
 Advocate

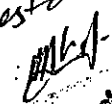
Muhammad Liaqat
 Advocate

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

Attested

 Muhammad Liaqat
 Advocate

Muhammad Liaqat
 Advocate

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

Attested

 Muhammad Liaqat
 Advocate


Muhammad Liaqat
 Advocate

Muhammad Liaqat
Advocate

		(i) Second Class Secondary School Certificate from a recognized Board with Shahadatul Alaminia Fil Uloomul Arabia wal Islamiya from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (T1) (BPS-15).	(i) Second Class Secondary School Certificate from a recognized Board with Shahadatul Alaminia from a recognized Tanzimatul Wafaqul Madaris, or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. Note: In case of non availability of suitable person for promotion, then by initial recruitment.
12.	Senior Qari (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
13.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and


Muhammad Liaqat
Advocate

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

Attested

 Muhammad Liaqat
 Advocate

Muhammad Liaqat
 Advocate

	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>	<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority cum fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment:</p>
<p>15. Certified Teacher (Agriculture) (BPS-15).</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government Institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p> <p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority cum fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

Attest of

 Munir Liaqat
 Advocate

P

	<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).</p>		<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>16. Certified Teacher (Home Economics) (BPS-15).</p>	<p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in-service training from Government Agro Technical Teacher Training Center; or</p> <p>(ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or</p> <p>(iv) Bachelor's Degree, from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics).</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p>

Muhammad Liaqat

Muhammad Liaqat
Advocate

	<p>University with one year vocational training from any Government training center or institute with nine months training from Government Agro. Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).</p>		<p>Certified Teacher (Home Economics). <u>Note:</u> In case of non-availability of suitable person for promotion, then by initial recruitment.</p>
<p>17. Drawing Master (BPS-15).</p>	<p>Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.</p>	<p>18 to 35 years.</p>	<p>(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed in initial recruitment of Drawing Master. Provided that if no suitable candidate is available for promotion on the basis of seniority-cum-fitness from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master. <u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>

AH etd
 11/5/16
 Muhammad Liaqat
 Advocate

P-46

~~26~~

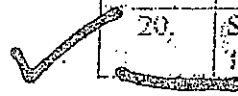
HA

26


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

Muhammad Liaqat Advocate

Muhammad Liaqat Advocate



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

Attestd

 Muhammad Liaqat
 Advocate



"BETTER COPY"

				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)	<p>i. Intermediate or equivalent from a recognized Board with Primary School Teacher Certificate / Diploma in Education from a recognized institute or</p> <p>ii. Secondary School Certificate from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.</p>	18 to 35 years	By initial 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.
22.	Qari (BPS-12)	Intermediate with Hifz-e-Quran and Qirât Sanad from a recognized institute	18 to 35 years	By initial recruitment

SCHEDULE

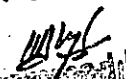
Selection criterion and other conditions for direct recruitment against the below mentioned posts shall be as in

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
B.A/B.S.	Marks obtained X 20 / total marks =
M.A Arabic / Shikhsatul Ma'arif Fil Uloomul Arabiyyah wal Islamiyyah from a recognized Tanzeematal Wafaqul Madaris	Marks obtained X 20 / total marks =
Other MA/M.Sc/M.Ed / MA Edu	Marks obtained X 15 / total marks =
M.P.H.U.P.R.D.	Marks = 05

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
B.A/B.S.	Marks obtained X 20 / total marks =
M.A/M.Sc/M.Ed / MA Edu	Marks obtained X 20 / total marks =
M.A Islamiyyah / Shikhsatul Ma'arif Fil Uloomul Arabiyyah wal Islamiyyah from a recognized Tanzeematal Wafaqul Madaris	Marks obtained X 20 / total marks =
M.P.H.U.P.R.D.	Marks = 05

Attested

 Advocate

~~100~~

P ~~119~~

~~11~~

29

Qual/Oaria

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
QW Passed from a recognized Institution	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
B.A/BSc	Marks obtained X 20 / total marks = ____
M.A/MSc/M.Ed/M.A Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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

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

A. Hasler
Advocate

~~150~~

Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc. 3 Extra marks for B.Sc. and 3 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
B.A/BSc	Marks obtained X 20 / total marks = ____	
DM Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc. 3 Extra marks for B.Sc. and 3 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
B.A/BSc	Marks obtained X 20 / total marks = ____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

Attest
Muhammad Liaqat
Advocate



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Annex G
31

NOTIFICATION

Peshawar, dated the 30th January, 2018.

No.SO(PE)4-5/SSRC/Meeting/2012/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:-

(i) against Serial No.1, in columns No.3 and 4, for the existing entries, 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).	21 to 35 years";

*Suppl
ADCE
For Compliance
as recommended*

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

3	4
(i) 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	19 to 35 years";

17/2/18

Muhammad Liaqat
Muhammad Liaqat
Advocate

- (b) Physics, Maths or Statistics; or
 (c) Humanities and other equivalent groups at degree level with English as subject;
 and
 (ii) nine months in service mandatory professional training at Regional Institute for
 Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).

32

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

3.	4.
(i) 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 (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

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

3.	4.
(i) At least Second Class Master's Degree in Islamiyat from a recognized University; or at least Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamia 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 (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

Attested
 [Signature]
 Muhammad Liaqat
 Advocate

(v) against Serial No. 13, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years";
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(vi) against Serial No. 17, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:


3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years";
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(vii) against Serial No. 18, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years";
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(viii) against Serial No. 21, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years"; and
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

Attested

Muhammad Liaqat
 Advocate

(ix) against Serial No.22. In columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Oirat Samad from registered Institution; and	19 to 35 years
(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

**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, 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.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *Approved*
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&SE Khyber Pakhtunkhwa. Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa Peshawar.

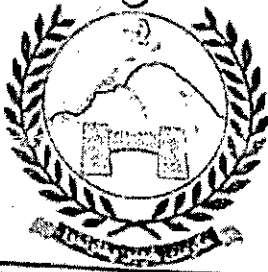
Attest
Muhammad Liaqat
Muhammad Liaqat
Advocate

[Signature]
SECTION OFFICER (Primary)

Annex "H"

35

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



No. 3052 /A/DEO LIT

Dated: 18/12/2019

0992-9310102, 0992-330131

E/DO.Education.Atd@gmail.com

To

1. Mr. Muhammad Kaleem GPS Thora Kalan District Abbottabad.
2. Mr. Qadeer Ahmad GPS Batangi, District Abbottabad.
3. Mr. Muhammad Tariq GPS Lora, District Abbottabad.
4. Mr. Aqee 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 Feteh, 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 Waqar GPS Dara Aman, District Abbottabad.
13. Mr. Sajid Mehmood
14. Mr. Mubarak Ali
15. Mr. Safdar Hussain
16. Mr. Nusrat Iqbal GPS Thana Karan Shah, District Abbottabad.
17. Mr. Zahoor Ahmed GPS Mora Changra, District Abbottabad.
18. Mr. Shafique GPS Chehr, District Abbottabad.

Att. Ad.
Muhammad Liaqat
Advocate

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.

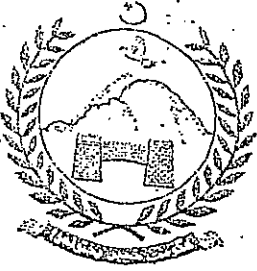
In view of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, petitioners do not fulfill the requisite eligibility criteria for promotion hence, departmental representations of petitioners are hereby rejected accordingly.

District Education Officer (M)
Abbottabad.

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.

- sd -
District Education Officer (M)
Abbottabad.



No. 11241/ADEO(Lit)

Dated: 15/10/2019

36



0992-9310102, 0992-330131

EDO.Education.Atd@gmail.com

To

The Director,
E&SE Khyber Pakhtunkhwa,
Peshawar.

Muhammad Liaqat
Advocate

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.

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 same subject matter. (Copy of legal notice attached).

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

District Education Officer (M)

of Abbottabad

Dated: 15/10/2019

Endst: No. 11242

Copy forwarded for information to the:

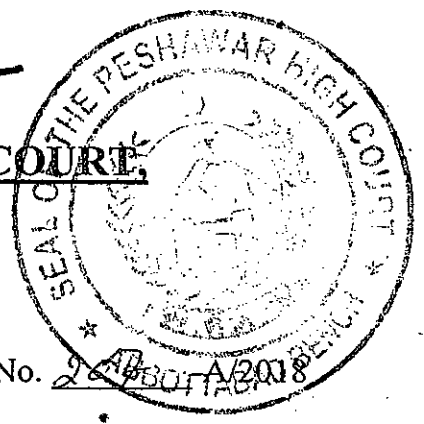
PA to Deputy Secretary (Legal) E&SED Khyber Pakhtunkhwa, Peshawar.

District Education Officer (M)

of Abbottabad

37/ AnnX I

**BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH**



Writ Petition No. 2/AB/2018

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

...PETITIONER

VERSUS

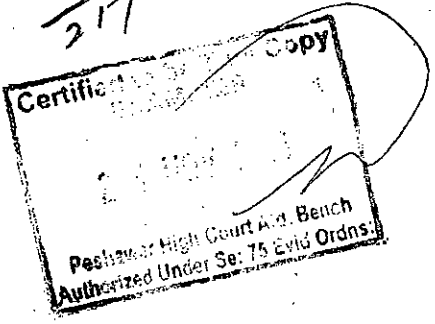
ETC
Ahmed
Muhammad Liaqat
Advocate

1. 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

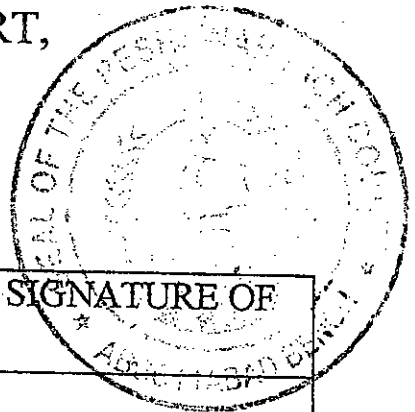
WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973, FOR ISSUANCE OF A DECLARATION TO THE EFFECT THAT PETITIONER BEING QUALIFIED AND HAVING PASSED NTS EXAMINATION WAS ENTITLED TO BE APPOINTED AS PST IN GPS NAGRI TUTIONAL UNION COUNCIL NAGRI TUTIONAL OR GPS RAHI UNION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

No. 1042
217/18



[Handwritten signature]

PESHAWAR HIGH COURT,
ABBOTTABAD BENCH
FORM 'A'
FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
07.11.2018	<p><u>W.P No. 207-A/2018.</u></p> <p>Present:- Mr. Awais Abbasi, Advocate for the petitioner.</p> <p>Sardar Muhammad Asif, AAG for the respondents.</p> <p style="text-align: right;">CTX <i>[Signature]</i> Muhammad Liaqat Advocate</p> <p style="text-align: center;">***</p> <p><u>SYED MUHAMMAD ATTIQUE SHAH, J.-</u> Petitioner</p> <p>Muhammad Ali has invoked the constitutional jurisdiction of this court praying that:-</p> <p style="text-align: center;"><i>“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.”</i></p> <p>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 considered and since the petitioner was hailing from the</p>

Certified
 I have read the original and Bench
 copies under Sec. 75 of the Constitution

M

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

3. Respondents were put on notice who appeared 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.

4. 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

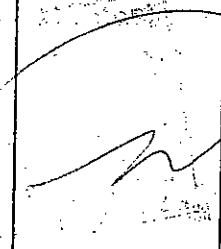
Muhammad Liaqat
Advocate

Copy
Order

}

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.

CT
 Muhammad Liaqat
 Advocate



{

41

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

JUDGE

Certified to be True Copy
EXAMINER
23 NOV 2018
Peshawar High Court Atd. Bench
Authorized Under Sec: 75 Evld Ordns.

CTO
Aet
Muhammad Liaqat
Advocate

Tufail**

Hon'ble Justices Lai Jan Khattak & Syed Muhammad Attique Shah.

42

ANNEXURE J³⁵

42

42



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT, KHYBER PAKHTUNKHWA
PHS-091-9223000/REG-091-9223000 Email: zulfikar@kpe.com

No. _____ Dated: / / 2018

Near Government Shahzeinuddin-Shah Jallal Saharooni School No. 1, Chitral Peshawar

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

Venue: Committee room Directorate of E&SE KP, Peshawar
Timing: 09:00 AM to 04:00 PM
Chaired by: Mr. Farid Khattak, Director, E&SE KP, Peshawar
Participants: Not Attached

1. Proceedings

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 Quran.

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

Sr. No.	Applicability	Decisions	Responsible
1	Construction of Group Latrines for Girls Students under Condition Grant 2017-18	The chair ordered DEOs concerned to construct group latrines (only for girls) under CG 2017-18 as per the decision of Secretary E&SE in the light of court decision. Work on the rest of schemes/facilities must not be started till the decision of socio-engineering team.	DEOs
2	Pending facilities under CG 2014-15, 2015-16 & 2016-17	The chair shared the grievance of worthy Secretary E&SE regarding pending facilities under CG 2014-15, 2015-16 & 2016-17 of which work still not completed. He also directed DDU team to share the list of pending facilities with concerned DEOs and also a copy of it may also be provided to the chair. The chair further directed the concerned DEOs to provide school wise lists of pending facilities & complete all such pending facilities and work on such schemes may also be conducted on weekly basis.	DDU team DEOs
3	Purchase of Science Equipment for Schools, F&F, IT Equipment for newly created SDEOs Offices	The chair was informed by a few DEOs that their respective Deputy Commissioners are not willing to convene the purchase committee meetings for the purchase of Science Equipment, F&F and IT equipment for newly established SDEOs offices. The chair directed DEOs to constitute local committee under their personal chairmanship and ensure the utilization of the budget under the said heads up to 30 May 2018. The target gets to be met by all the DEOs.	DEOs

NOTE: All employees E&SE department have to attend the meeting on time & follow the E&SE code of conduct & discipline. No mobile phones are allowed in the meeting room. If any DEO fails to attend on time, the same will be reported to the Director, E&SE KP, Peshawar.

38

ANNEXURE J

Batter Copy

~~XXXXXXXXXX~~ 338
"1"

42A



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

No. / Dated / / 2018

Near: Government Shaheed Hussain Siarri 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

Timing: 09:00 AM to 04:00 PM

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

Participants: List Attached

Proceedings

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 Quran.

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

S.No.	Activity	Decisions	Responsibility
1	Construction of Group Latrines for Girls Students under Conditional Grant 2017-18	The chair directed DEOs concerned to construct group latrines (only for girls' schools) under CG 2017-18 as per the decision of Secretary E&SE in the light of court decision. Work on the rest of schemes/facilities must not be started till the decision of socio-engineering team.	DEOs
2	Pending facilities under CG 2014-15, 2015-16 & 2016-17	The chair shared the grievance of worthy Secretary E&SE regarding pending facilities under CG 2014-15, 2015-16 & 2016-17 on which work still not completed. He also directed DDU team to share the list of pending facilities with concern DEOs and also a copy of it may also be provided to the chair. The chair further directed the concerned DEOs to provide school wise lists of pending facilities & complete all such pending facilities and work on such facilities may also be monitored on weekly basis.	DDU team DEOs
3	Purchase of Science Equipment for Schools, F&F, IT Equipment for newly created SDEOs Offices	The chair was informed by a few DEOs that their respective Deputy Commissioners are not willing to convene the purchase committee meetings for the purchase of Science Equipment, F&F and IT equipment for newly established SDEOs offices. The chair directed DEOs to constitute local committee under their personal chairmanship and ensure the utilization of the budget under the said heads up to 30 th May 2018 (The target get was set by all the DEOs).	DEOs

Note: All employees E&SE department & other interested ones please type "Follow Dir ESE KP" in your mobile message & send it to 10101 to get free tweets of Directorate of E&SE KP Peshawar on your mobile.



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

Pik: 091-9225344 / Fax: 091-9225345 Email: ed@kpemulkp.gov.pk

43/

29

No.

Dated ___/___/2018

Secr. Government, Shindeed Hussain, Shorif, Higher Secondary Schools, Peshawar City, Peshawar

4	Autonomy of HSS	The chair directed the DEOs to shift the funds under hiring of teachers (only) in Autonomy budget of HSS to the PTC accounts of the respective school to be utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring. Chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSSs/IGHSSs to discuss the issues in the utilization of autonomy budget and its resolution.	DEOs
5	Release of Remaining 25% budget under Non-Salary head.	It was revealed that almost 75% of the budget under Non-Salary head have been utilized therefore the chair directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of Conveyance Charges for Female ASDEOs.	As per the direction of the Secretary E&SE, utilization under this head is alarmingly low. Therefore as per decision of the Secretary E&SE the chair further directed DEOs to submit & clear all the pending bills immediately & in future submit all such bills along with relevant documents to the account offices up to 5 th of each month for clearance. The bills of previous month if not cleared for any reason, shall not be paid to the ASDEOs afterwards.	DEOs
7	Reporting of issues regarding budget execution to Directorate	It was revealed in the meeting that some DEOs have issues on part of DO office, DO (F&P) and District Govt. with reference to the budget execution. In this regard the Deputy Director P&D suggested that they should report such issues well in time to Directorate in order to tackle such issues immediately at proper forums.	DEOs
8	GPS Coordinates for developmental schemes	Regarding PC-1 for developmental schemes Deputy Director P&D suggested the DEOs to send GPS coordinates GIS map location with PC-1 for proper verification of the proposed site. Sample GPS coordinates GIS map sheet will be shared with all DEOs via email.	DEOs DD P&D
9	Vacant Positions	All the DEOs (Male & Female) directed to provide vacant position of all cadres & data regarding retirement of personnel (from 1 st April 2018 to 30 th September 2018) of each cadre with proper school wise STR must be sent ASAP.	DEOs DD P&D
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPSTs/PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment.	DEOs

Alfred
Muhammad Jagat
Advocate

NOTE: All employees (E&SE department & other interested ones) please type "Follow Dir_ESE_KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.

43-A

Better copy

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

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

4	Autonomy of HSS	The Chair directed the DEOs shift the funds under hiring of teachers fondly in Autonomy budget of HSS to the PTC accounts of the respective school to utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSS and GGHSSs to discuss the the agues in the mutation of autonomy budget and is resolution	DEOs
5	Release of reaining 25% budget under non salary head	It was fevered that their brost to the budget under non salary have been utilized therefore the other directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of conveyance chaiges for female asdeos	As per the direction of secretary E&SE utilization under this head is alarmingly low therefore as set per decision of the secretary E&SE the Chair further directed DEOs to submit &their all pending bills immediately and in future submits all such bills 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 not be paid to the ASDEOs afterwards	DEOs
7	Reporting of ussues regarding budget execution to directorate	It was revealed in the meeting thatsome DEOs have ussues on part of DC office DOE&P and District Govt with refrence to the execution with this regard the deputy Director PSD suggested that they should report such issues within time to directorate in order to such issues well immediately at proper forums.	DEOs
8	GPS coordinates for developmental schemes	Regarding PC 1 for developmental schemes deputy Director P&D suggested the DEPs to sent GPS coordinates GIS map location with PC 1 for proper verification of the proposed site sample GPS coordinates GIS map sheet will be shared with all DEOs by email	DEOs DD P &D
9	Vacant Positions	All the DEOs (Male & Female directed to provide vacant position of all cadres & data regarding retirement of persons from 1st April 2018 to 30th September 2018 mst be sent ASAP	DEOs DD P &D
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPSTs, PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction recruitment.	DEOs

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.

49

DIRECTORATE OF PRIMARY, TRAY & SECONDARY
EDUCATION DEPARTMENT KHIBER PAKISTAN
PH: 0322-5111111 FAX: 0322-5111111 Email: info@kpe.gov.pk

No. _____ Date: 15/11/2019

Notes: Government Schools, Private Schools, Madaris and other schools of all districts

1. All DEOs are directed to implement and follow policy regarding transfer of employees appointed through NPS in addition to mutual transfer and college as per rules and regulations already notified.	DEOs
2. DEOs to ensure strict observance of their schools. They are not to permit unauthorized use of school building as court.	DEOs
3. DEOs are directed to respond via official calls/ SMS/ emails within the duty hour as well as after the close of business. All of them must follow the official WhatsApp group and not to quit it. The officials are directed to use the official WhatsApp group for only relevant contents/communications.	DEOs
4. DEOs are directed not to follow the orders/instructions/suggestions of personnel not related to the E&SE Department regarding school activities.	DEOs
5. With reference of the CS directives of the DEOs (M&F) directed to create their official district level Face book & Twitter accounts, update them regularly and share their operations along with details of local person with DD-P&D immediately.	DEOs

CTD
M&F
15/11/2019

M&F
15/11/2019

Deputy Director (P&D)
E&SE Khyber Pakhtunkhwa

End in No. _____ Sent by (Signature/DPES) / Date: 15/11/2019

- 1. Copy to Director's office
- 2. All the Districts for information & proper compliance (Office)

Deputy Director (P&D)
E&SE Khyber Pakhtunkhwa

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

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

4	Posting transfer of 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.	DEOs
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
6	Communication with District Official	Chair Directed DEOs 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 personni not related to the E&SE department regarding scout activities.	DEOs
8	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 communicated 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 message and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.

OFFICE 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			
	Naqash 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	-do-	-do-	-do-
	Asif Khan	ASDEO Circle Dhamtour	-do-	-do-	-do-
	Muhammad Zaman	Assistant Local Office	-do-	-do-	-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 above period.

Indst: No. 10/19-21 /Promotion SPST to PSHT

sd
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Dated 26/9 /2019

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy District Education Officer (M) Local Office
3. All the Member of Committee.

AH
Muh. *Liqaat*
Advocate

Liqaat
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

وکالت نامہ

کورٹ فیس

بعدالت جناب سر جسٹریٹ پی ایچ آر

عنوان: محمد الرحمان بنام گورنمنٹ آف پاکستان

منجانب: ایڈووکیٹ / جناب الرحمان

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

محمد رحمان ایڈووکیٹ صاحب کے

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے 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 پرداختہ مجھ کو منظور و

قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 13/01/2020

Accepted

بمقام:

العباد

العباد

محمد الرحمان ولد محمد صہب خان سکس ایم گریڈ بی بی عیسیٰ پورہ

بصطلاح

تاریخ