

15.11.2017

No one is present on behalf of the appellant. Addl: AG for respondents present. Notices be issued to the appellant and his counsel. To come up for arguments on 16.01.2018 before D.B.

61 Y 61



(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member

16.01.2018

None present on behalf of the appellant. Mr. Muhammad Jan, Learned Deputy District Attorney for the respondents present. Case called for several times but no one appeared on behalf of the appellant. Therefore the present appeal is dismissed in default. File be consigned to the record room.



(Gul Zeb Khan)
MEMBER



(Muhammad Hamid Mughal)
MEMBER

13 13.12.2016

Counsel for the appellant and Additional AG for the respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 18.4.17 before D.B.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

14 18.04.2017


Counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 26.07.2017 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

15 26.07.2017

Counsel for the appellant and Addl: AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 15.11.2017 before D.B.


(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

26.10.2015

None present for appellant. Mr. Khurshid Khan, SO alongwith Addl. A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 28.01.2016 before S.B.

(MIRAN KHAN) MEMBER

(SALIM KHAN) MEMBER

Chairman

28.1.2016

None present for appellant. Mr. Khurshid Khan, SO alongwith Assistant AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 16.5.2016.

(MIRAN KHAN) MEMBER

(SALIM KHAN) MEMBER

Chairman

16.05.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Requested for time to rejoinder case to come up for rejoinder/arguments on 25.8.2016.

Member

Member

25.08.2016

Counsel for the appellant and Mr. Usman Ghani, Sr.GP for respondents present. Rejoinder not submitted and requested for further time to submit rejoinder. Last opportunity granted. To come up for rejoinder and arguments on 13-12-16 before D.B.

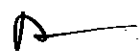
(MIRAN KHAN) MEMBER

Member

Member

25.05.2015

Clerk of counsel for the appellant present and requested for adjournment due to general strike of the Bar. To come up for preliminary hearing on 23.06.2015 before S.B.


Member

7

23.06.2015


None present for appellant. Notice to counsel for the appellant be issued for preliminary hearing for 28.7.2015 before S.B.


Chairman

8

28.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Headmaster (BPS-17) when 374 such posts of BPS-17 were up-graded to BPS-18 with effect from 1.7.2012 and on the basis of the same other officers promoted/up-graded to BPS-18 vide notification dated 25.4.2014 with immediate effect. That the appellant was ignored as by then he had retired from service on 1.11.2013. That the appellant preferred departmental appeal for granting him service benefits on the basis of up-gradation of posts with effect from 1.7.2015 which was not responded and hence the instant service appeal on 28.10.2014.

Appellant Deposited
Security & Process Fee 



That the appellant is entitled to service benefits by availing up-gradation with effect from 1.7.2012 as he was entitled to the same with effect from the said date.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.10.2015 before S.B.


Chairman



13-15-15

3,

Reader Note:

21.01.2015

Since 20th January has been declared as public holiday by the provincial government, therefore, case is adjourned to 02.03.2015 for the same.


Reader

4,

02.03.2015

Counsel for the appellant present. Requested for adjournment. Adjourned to 22.04.2015 for preliminary hearing before S.B

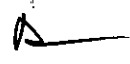


Member

5,

22.04.2015

Counsel for the appellant present. Learned counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 25.05.2015 before S.B.



Member

3. Reader Note:

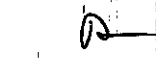
21.01.2015

Since 20th January has been declared as public holiday by the provincial government, therefore, case is adjourned to 02.03.2015 for the same.


Reader

4. 02.03.2015

Counsel for the appellant present. Requested for adjournment. Adjourned to 22.04.2015 for preliminary hearing before S.B


Member

5. 22.04.2015

Counsel for the appellant present. Learned counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 25.05.2015 before S.B.


Member

3. Reader Note:


21.01.2015

Since 20th January has been declared as public holiday by the provincial government, therefore, case is adjourned to 02.03.2015 for the same.


Reader

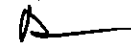
4. 02.03.2015

Counsel for the appellant present. Requested for adjournment. Adjourned to 22.04.2015 for preliminary hearing before S.B


Member

5. 22.04.2015



Counsel for the appellant present. Learned counsel for the appellant seeks adjournment. Adjourned for preliminary hearing to 25.05.2015 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1285/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate.
1	2	3
1	28/10/2014	<p>The appeal Mr. Muhammad Tahir presented today by Mr. Muhammad Anwar Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>20-1-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2	6-11-2014	

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 1885 of 2014

Muhammad Tahir.....Appellant

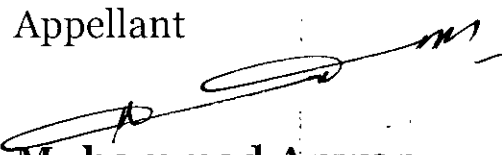
VERSUS

Govt of KPK and others.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Grounds of service appeal		1-6
2.	Affidavit		7
3.	Addressees of Parties		8
4.	Copy of letter and seniority list	A-A/1	9-15
5.	Copy of Notification dt.28.02.2012,	B	16
6.	Copy of notification/ memo	C	17
7.	Copy of Notification dt.16.09.2013.	D	18
8.	Copy of the Notification	E	19-25
9.	Copy of departmental appeal	F	26-31
10.			
11.	Wakalat Nama		32

Through Appellant


Muhammad Anwar
Advocate High Court,
Cell: 0300-9017086

Date: 27/10/2014

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 1285 of 2014

1317
28-10-2014

Muhammad Tahir,
Ex-Headmaster, GHS Palosi Mughdarzai,
Presently R/o Street No.7, Canal Town, Nasir Bagh Road,
Tehsil and District, Peshawar.....Appellant

V E R S U S

1. Govt of KPK
through Chief Secretary,
Civil Secretariat, Peshawar
2. Secretary to Govt of KPK,
Education Department,
Civil Secretariat, Peshawar
3. Director,
Elementary & Secondary Education,
KPK Peshawar.....Respondents

**Appeal u/s 4 of the Khyber
Pakhtunkhwa Service Tribunal Act,
1974 against the Notification bearing
No.SO(S/M)/1-3/2013/Promotion BPS-
17 to BPS-18, whereby posts of 353
officers of the Teaching Cadre of
Elementary & Secondary Education,
Peshawar have been upgraded from
BPS-17 to BPS-18 with immediate effect
instead of 01.07.2012, on regular basis
in the light of upgradation of 4-Tier
Formula, notified through Govt of KPK,**

28/10/14.

Finance Department Notification
No.BOV/FD/2-112/2011/04-Tier Formula
dated Peshawar the 28th Feb: 2012,
ignoring the appellant, against which
the departmental appeal dated
02.07.2014 of the appellant has not
been responded within the statutory
period of 90 days by the respondents.

Respectfully Sheweth:

1. That the appellant joined the Education Department, in the capacity of SET, on 20.12.1976, having qualification of M.A, B.Ed.
2. That the appellant was promoted to the post of Headmaster (BPS-17) on 31.08.2000 and was posted as Headmaster, GHS, Palosi Mughdarzai, Peshawar.
3. That the appellant is at Serial No.178 of the final seniority list, as stood on 13.02.2013, prepared by respondent No.3 and sent vide covering letter No.1727/File No.20/A-88/T and F.S.L B-17 (M) dated 14.02.2013 for approval of the competent authority. (Copy of the letter and seniority list are annexed as Annexure "A" & A'/1").
4. That the Govt of KPK, Finance Department through Notification No.BOV/F-D/2-112/2011-Tier Formula

dated 28.02.2012, upgraded total sanctioned strength of 5164 posts i.e. BPS-20, BPS-19, BPS-18 and BPS-17 (as on 30.09.2009) of the Teaching Cadre of Elementary & Secondary Education Department, on the basis of 4-Tier Formula carrying the ratio of 1:15:34:50 first phase effective from 01.07.2012, subject to the observance of all codal formalities. (Copy of the Notification is annexed as Annexure "B").

5. That the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar through Memo No.5257-91/A-12/Estt:-1/4/Tier dated 31.03.2012, directed all the Principals, Headmasters, SSs (Male & Female) in BPs-17 and above, working in all the Districts of Khyber Pakhtunkhwa to provide the information as detail below: -
- i. Bio-Data (length of service)
 - ii. CNIC and SCC (attested copy)
 - iii. Non-involvement certificate
 - iv. Ten photographs (passport size)
 - v. ACR (complete period of the present scale)

(Copy of the notification/ memo is annexed as Annexure "C").

6. That the appellant, being Headmaster GHS Palosi, Mughdarzai, Peshawar, in pursuance of the said memo and having more than 11 years service on BPS-17

regular post, submitted the required/ requisite information well within time to the quarter concerned.

7. That the appellant has been retired at the age of superannuation w.e.f. 01.11.2013 vide Notification bearing No.3938-4/5 LPR dated 16.09.2013. (Copy of the Notification is annexed as Annexure "D").
8. That on 20.06.2014, when the appellant visited the office of the Section Officer/ Legal Representative Elementary & Secondary Education, Civil Secretariat, KPK, Peshawar in connection with his personal affairs, he came to know there about the notification, impugned herein, whereby 353 officers of the Teaching Cadre of Elementary & Secondary Education Department were promoted with immediate effect, instead of 01.07.2012 and also ignoring the appellant. (Copy of the Notification is annexed as Annexure "E").
9. That the appellant filed departmental appeal/ representation dated 02.07.2014. (Copy annexed hereto marked "F") for the redressal of his grievance but no response from the respondents within the statutory period, hence this service appeal, on the following grounds, inter alia:

G R O U N D S:

- A. That the posts of BPS-18 were sanctioned and were available vacant w.e.f. 01.07.2012.

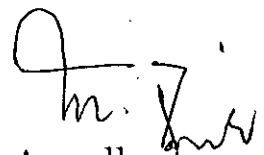
- B. That the requisite/ required qualification and length of service for upgradation/ promotion to BPS-18 was 7 years, whereas the length of service of appellant on BPS-17 upto 01.07.2012 was more than 11 years.
- C. That as per 4-Tier formula, the Finance Department upgraded a total 1765 in BPS-20, BPS-19 and BPS-18 in two phases by abolishing equal number of posts of BPS-17 as mentioned in the Notification (Annex-B).
- D. That the appellant was entitled to be promoted to BPS-18 w.e.f. 01.07.2012, as there were 374 posts of BPS-18 available on 01.07.2012.
- E. That it is settled law that civil servant holding qualification and other conditions prescribed for promotion to certain post would have right to be considered for promotion and the appellant had the required/ requisite qualification and length of service on 01.07.2012 for the promotion to BPS-18.
- F. That it is also settled law that the action of departmental authority in with holding promotion of the appellant w.e.f. 01.07.2012 is unlawful and violative of all norms of justice.
- G. That it is also settled law that where, notification, whereby mandatory benefit is allowed to a civil servant from the date legally accrued to him, is delayed or is

not issued at the time of accrual of such benefit, same can be given with retrospective effect for the reason that the civil servant cannot be made to suffer for the delay made on the part of departmental authority.


H. That any other ground, with leave of the Honourable Tribunal, will be raised at the time of hearing of the appeal and after recording of evidence, if any.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the appellant being eligible for the post of BPS-18 on 01.07.2012, may please be granted BPS-18 w.e.f. 01.07.2012, being the first phase of 4-Tier formula sanctioned and approved by the Govt of Khyber Pakhtunkhwa vide Notification No.BOV/FD-2-112/2011/04-Tier Formula dated 28.02.2012 with all back benefits.

Any other relief, which has not been asked for specifically and the Honourable Tribunal deem appropriate, may also be granted in favour of the appellant.


Appellant

Through


Muhammad Anwar
Advocate High Court,
Peshawar

Date: 27/10/2014

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____ of 2014

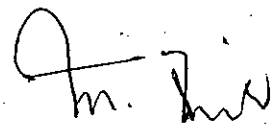
Muhammad Tahir.....Appellant

VERSUS

Govt of KPK and others.....Respondents

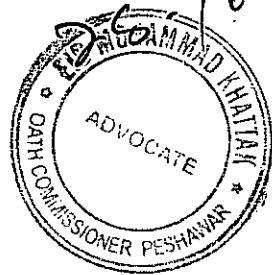
AFFIDAVIT

I, Muhammad Tahir, Ex-Headmaster, GHS Palosi Mughdarzai, Presently R/o Street No.7, Canal Town, Nasir Bagh Road, Tehsil and District, Peshawar do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

ATTESTED
10.2.14



BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____ of 2014

Muhammad Tahir.....Appellant

V E R S U S

Govt of KPK and others.....Respondents

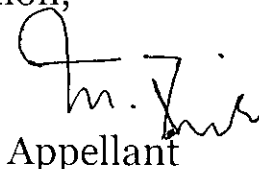
ADDRESSES OF PARTIES

APPELLANT:

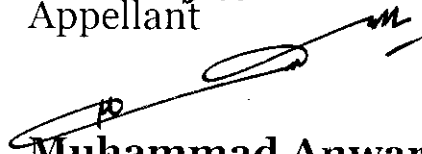
Muhammad Tahir,
Ex-Headmaster, GHS Palosi Mughdarzai,
Presently R/o Street No.7, Canal Town, Nasir Bagh Road,
Tehsil and District, Peshawar

RESPONDENTS:

1. Govt of KPK
Through Chief Secretary,
Civil Secretariat, Peshawar
2. Secretary to Govt of KPK,
Education Department,
Civil Secretariat, Peshawar
3. Director,
Elementary & Secondary Education,
KPK Peshawar


Appellant

Through


Muhammad Anwar
Advocate High Court,
Peshawar

Date: 27/10/2014

9

A measure - A

Directorate Of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar

No. 1727 / File No.20/A-88/T&F.S.L B-17 (M)

Dated Peshawar the 14.2.2013.

To The Secretary to Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Deptt:

Subject:- FINAL SENIORITY LIST OF OFFICERS BPS-17 MALE

I am directed to submit herewith ^{draft} Final Seniority List of Head Masters
/ Subject Specialists stood on 13-02-2013 for the approval of the competent
authority please.

[Signature]
14/2/2013
Deputy Director (Establishment)
Schools & Literacy Khyber Pakhtunkhwa,
Peshawar.

Endst: No. _____

Copy forwarded for information to the:-

- 1. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.

Deputy Director (Establishment)
Schools & Literacy Khyber Pakhtunkhwa,
Peshawar.

DECID

*Re processed
metrop 2/15/2*

ATTESTED

Attested

[Signature]

2283
1412

391
14/2

50 (S/M)
15/2

Elementary & Secondary
Education Department

137
15/2

MONTHLY LIST OF HEADMASTER/SUBJECT SPECIALIST (MALE B-17) OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA STOOD ON 13-02-2013

Sl. No.	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post		Designation/Place of Posting	Remarks
					Date	BPS		
1	Umar Muhammad MA BEd SS (Part Study)	01.05.1955	Swat	28.02.1989	28.02.1989	17	By Promotion	SS GHSS Khwaza Khela Swat vd SO(S/M) E&SED/2012/ Incharge SS / Umar Muhammad
2	Tomash Khan M.A B.Ed	17/03/1953	Mardan	01/11/1974	08/11/1995	17	do	HM GHS Hatyan Mardan vd SO(S/M)/1-5/08/dt 20.05.2011
3	Wahid Khan M.A B.Ed	04/04/1953	Charsadda	04/11/1974	08/11/1995	17	do	HM GHS Babara Chda vd SO(S/M)/1-5/08/dt 20.05.2011
4	Cher Afzal MA BEd	29/05/1957	Dir (L)	02/12/1978	08/11/1995	17	do	HM GHS Balambat Dir (L) do
5	Mubarak Shah M.Sc B.Ed	01/09/1966	Moh.Agy.	08/11/1995	08/11/1995	17	do	SS GHSS Ghari Kapora mardan do
6	Nazli Ahmad. B.A B Ed	27/06/1960	Abbottabad	12/12/1985	08/11/1995	17	do	HM GHS Garni Noorpur do
7	Basood Ur Rehman SS	01.08.1958	Peshawar	10/11/1987	06/05/1995	17	do	SS GHSS Chamkani Peshawar sen.aw.vd so(s)/s&l/1-4/5 dt 5-9-09
8	Gudiq Ahmad M.A B.Ed	16/08/1953	Malakand	16/11/1974	26/05/1995	17	do	HM GHS Ghani Dher Malakand do
9	Muhammad Iqbal M.A B.Ed	15/02/1953	Swat	20/11/1975	30/08/1997	17	do	HM GHS Bhari Battagram do
10	Muhammad Zaman M.A B.Ed	05/06/1954	Dir	20/11/1975	30/08/1997	17	do	HM GHS Dir U do
11	Allah Nawaz M.A B.Ed	09/12/1953	Dir	25/11/1975	30/08/1997	17	do	HM GHS Sagu DIKhan do
12	Nek Bal Khan M.A B.Ed	12/04/1953	SWA	05/12/1975	30/08/1997	17	do	HM GHS Spin SWA do
13	Umar Nawaz Khan M.A B.Ed	21/01/1954	Bannu	13/12/1975	30/08/1997	17	do	HM GHS Hukamzad Dardariz Bannu do
14	Ihsanud Din M.A B.Ed	03/01/1954	DIKhan	02/07/1976	30/08/1997	17	do	HM GHS Kiri Shamoza DIKhan do
15	Muhammad Asif Khan M.A B.Ed	13/04/1953	Bannu	10/01/1976	30/08/1997	17	do	HM GHS Sero Bada Khel Bannu do
16	Muzamil Hussain M.A B.Ed	01/08/1953	Mardan	10/01/1976	30/08/1997	17	do	HM GHS Sangao Mardan do
17	Mir Aslam Khan M.A B.Ed	12/10/1953	Bannu	02/12/1975	30/08/1997	17	do	HM GHS Hakim Bharat Bannu do
18	Hanim Shah M.A B.Ed	15/01/1964	Kohat	29/06/1967	30/08/1997	17	do	HM GHS Suratti Kila Karak do
19	Abdul Ghafar M.A B.Ed	20/09/1953	Malakand	20/11/1975	30/08/1997	17	do	HM GHS Jalala Malakand do
20	Umer Niaz Khan M.A B.Ed	14/08/1953	Bannu	14/03/1976	30/08/1997	17	do	HM GHS Mamash Khel Bannu do
21	Muhammad Manzoor M.A B.Ed	15/02/1954	DIKhan	05/03/1976	30/08/1997	17	do	HM GHS Sheru Koha DIKhan do
22	Muhammad Khubaz Khan M.A B.Ed	01/03/1953	Bannu	14/04/1976	30/08/1997	17	do	HM GHS Mamash Khel Bannu do
23	Israrul Haq M.A B.Ed	20/04/1954	Dir	17/04/1976	30/08/1997	17	do	HM GHS Toda Shina Dir Lower do
24	Muhammad Zafrullah M.A B.Ed	02/10/1953	Mardan	03/09/1976	30/08/1997	17	do	HM GHS Labour Colony Mardan do
25	Wadan Gul M.A B.Ed	04/08/1955	K/Agency	15/09/1976	30/08/1997	17	do	HM GHS Spin Dhand Kh /Agency do
26	Noor Amal Khan. B.A B.Ed	05/10/1959	FR Bannu	12/08/1987	11/02/1999	17	do	HM GHS Surat Khan Killi F.R Banru do
27	Syed Shoukat Shah B.A B.Ed	01/01/1955	Khy Agency	20/06/1979	31/03/1999	17	do	HM GHS Zintara Khyber Agency do
28	Sultan Saeed M.A B.Ed	01/04/1969	karak	10/07/1999	10/07/1999	17	do	SS GHSS Usterzai Kohat do
29	Munaf Gul M.A B.Ed	01/06/1966	Kohat	05/09/1999	25/11/1999	17	do	SS GHSS Usterzai Kohat do
30	Younas Ali Khan M.A B.Ed	10/04/1973	Lakki	25/11/1999	25/11/1999	17	do	SS GHSS No. 2 DiKhan do
31	Muhammad Farooq M.A B.Ed	01/10/1969	karak	17/02/2000	17/02/2000	17	do	SS GHSS Gumbat Kohat do
32	Gul Farosh Khan M.A B.Ed	01/05/1969	Swat	10/07/1999	10/07/1999	17	do	SS GHSS Sandori Swat do
33	Sheraz Ahmed M.A B.Ed	10/03/1970	Swabi	17/02/2000	17/02/2000	17	do	SS GHSS Kabgani Swabi do

Ammer-A/1

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Approved

Sl. No.	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
34	Muhammad Parsa M.A B.Ed	01/01/1971	Bannu	10/07/1999	10/07/1999	17	By Promotion	SS GHSS Ustarzai Kohat	
35	Muhammad Nawaz M.A B.Ed	31/12/1968	Abbottabad	10/07/1999	10/07/1999	17	D/Selectee	SS GHSS Lora A. Abad	
36	Kayat Khan M.A B.Ed	20/03/1965	karak	25/11/1999	25/11/1999	? 17	do	SS GHSS Bogara Karak	
37	Lakhu Alam M.A B.Ed	01/02/1969	karak	25/11/1999	25/11/1999	? 17	do	SS GHSS Lachi Kohat	
38	Ajmal Khan M.Sc B.Ed	28/04/1971	Mardan	05/07/1999	05/07/1999	? 17	do	SS GHSS Baghicha Dheri Mardan	
39	Uzair Ahmad M.A B.Ed	20/05/1971	Haripur	10/07/1999	10/07/1999	? 17	do	SS GHSS Lora A. Abad	
40	Wilayat Khan M.A B.Ed	13/03/1962	Swat	17/02/2000	17/02/2000	? 17	do	SS GHSS Gujar Garhi Mardan	
41	Islitaq Ahmad M.A B.Ed	13/04/1969	Nowshera	19/11/1994	12/02/1999	? 17	do	SS GHSS Manki Sharif NSR	
42	Mansoor Ahmad M.A B.Ed	06/01/1973	karak	18/11/1998	18/11/1999	17	do	SS GHSS Takhat Nasrati Karak	
43	Muhammad Shoaib Khan M.A B.Ed	05/06/1970	DIKhan	10/07/1999	10/07/1999	17	do	SS GHSS Murjali DI K	
44	Naveed Ahmad M.A B.Ed	05/04/1973	Charsadda	21/02/1989	10/07/1999	17	do	SS GHSS Umarzai Charsadda	
45	Abdul Qadir M.A B.Ed	25/03/1971	FR Bannu	17/02/2000	17/02/2000	17	do	SS GHSS Shakardra Kohat	
46	Khalid Mahmood M.A B.Ed	15/05/1958	Charsadda	26/10/1983	25/11/1999	17	do	SS GHSS Utmanzai Charsadda	
47	Abid Ullah Shah M.A B.Ed	11/05/1972	Bannu	17/02/2000	17/02/2000	17	do	SS GHSS Paroa DIKhan	
48	Gul Hussain Shah M.A B.Ed	13/02/1967	Peshawar	10/07/1999	10/07/1999	17	do	SS GHSS Adazai Peshawar	
49	Muhammad Rehman M.A B.Ed	03/04/1972	FR Bannu	10/07/1999	10/07/1999	17	do	SS GHSS Berote A. Abad	
50	Farzand Ali Shah M.A B.Ed	10/04/1967	Mansehra	18/11/1999	18/11/1999	17	do	SS GHSS Jareed Mansehra	
51	Inayatur Rehman M.A B.Ed	15/09/1971	Swat	18/11/1999	18/11/1999	17	do	SS GHSS Baidara Swat	
52	Muhammad Mehdi Shah M.A B.Ed	11/01/1965	Charsadda	23/12/1989	17/02/2000	17	do	SS GHSS Utmanzai Charsadda	
53	S. Ashfaq Ali Shah M.A B.Ed	16/12/1966	Nowshera	17/02/2000	17/02/2000	17	do	SS HGSS Bagnotar A/ Abad	
54	Zia Ullah M.A B.Ed	01/11/1967	Charsadda	17/02/2000	17/02/2000	17	do	SS GHSS Dosehra Charsadda	
55	Muhammad Tariq Bahtti M.A B.Ed	31/03/1969	DIKhan	21/11/1994	03/07/1999	17	do	SS GHSS Murjali DI K	
56	Sultan Muhammad M.A B.Ed	20/05/1967	Moh: Agy	03/07/1999	03/07/1999	17	do	SS GHSS Ghalanai Moh Agency	
57	Hakim Ullah M.A B.Ed	09/01/1972	FR Bannu	03/07/1999	03/07/1999	17	do	SS GHSS Gali A. Abad	
58	Fida Muhammad M.A B.Ed	01/04/1959	Shangla	01/11/1986	03/07/1999	17	do	SS GHSS Sandavi Swat	
59	Arif Iqbal M.A B.Ed	15/03/1970	Peshawar	03/07/1999	03/07/1999	17	do	SS GHSS No.3 Peshawar City	
60	Muhammad Zaheer M.A B.Ed	16/04/1968	Abbottabad	03/07/1999	03/07/1999	17	do	SS GHSS Lora A. Abad	
61	Mumtaz Saddiqi M.A B.Ed	21/11/1962	karak	10/07/1999	10/07/1999	17	do	SS GHSS T. Nastrati Karak	
62	Muhammad Sajjad M.A B.Ed	21/05/1964	Abbottabad	10/07/1999	10/07/1999	17	do	SS GHSS Khanas Pur A. Abad	
63	Muhammad Tahir M.A B.Ed	22/04/1968	Bannu	10/07/1999	10/07/1999	17	do	SS (Eco)GTHSS Gulbahar Peshawar	
64	Abdul Nasir Khan M.A B.Ed	14/04/1969	karak	25/11/1999	25/11/1999	17	do	SS GHSS Lachi Kohat	
65	Muhammad Abid Jan M.A B.Ed	02/05/1967	Swat	25/11/1999	25/11/1999	17	do	SS GHSS Fateh Pur Swat	
66	Zahid Amin M.A B.Ed	01/05/1966	Swabi	20/08/1995	25/11/1999	17	do	SS GHSS Zaida Swabi	
67	Mateen Ullah M.A B.Ed	05/01/1971	Swabi	25/11/1999	25/11/1999	17	do	SS GHSS Kabgan Swasi	
68	Fida Muhammad M.A B.Ed	05/05/1972	Kohat	30/05/1996	25/11/1999	17	do	SS GHSS Doaba Kohat	
69	Muhammad Fiaz M.A B.Ed	14/11/1968	Haripur	03/07/1999	03/07/1999	17	do	SS GHSS T. T Ship Haripur	
70	Wasi. Ullah M.A B.Ed	10/02/1973	Mardan	03/07/1999	03/07/1999	17	do	SS GHSS Katlarg Mardan	
71	Wagar Ahmad Khan M.A B.Ed	01/05/1965	Swabi	10/07/1999	10/07/1999	17	do	SS GHSS Nizampur NSR	
72	Hamd Ullah Jan M.A B.Ed	05/05/1966	Lakki	10/07/1999	10/07/1999	17	do	SS GHSS Berote A Abad	
73	Azhar Hussain Shah M.A B.Ed	07/04/1970	Haripur	10/07/1999	10/07/1999	17	do	SS GHSS T. T. Ship Haripur	
74	Muhammad Arif M.A B.Ed	20/04/1970	Nowshera	10/07/1999	10/07/1999	17	do	SS GHSS Akbarpura, Nowshera	

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Sl. No.	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
75	Ihsan Ahmad M.A B.Ed	11/02/1969	Nowshera	10/07/1999	10/07/1999	17	D/Selectee	SS GHSS Risatpur NSR	
76	Muhammad Yousaf M.A B.Ed	21/02/1967	Lakki	10/07/1999	10/07/1999	17	do	SS GHSS Bagnator A Abad	
77	Gul Nawaz Khan M.A B.Ed	05/11/1968	Swabi	26/06/1996	10/07/1999	17	do	SS GHSS Kabgari Swabi	
78	Nigar Ahmad M.A B.Ed	20/08/1972	karak	10/07/1999	10/07/1999	17	do	SS GHSS T. Nasrati Karak	
79	Bashrat Khan M.A B.Ed	30/06/1967	Haripur	12/10/1998	17/02/2000	17	do	SS GHSS T.T Ship Haripur	
80	Bashrat Ahmad M.A B.Ed	27/03/1971	Haripur	25/11/1999	25/11/1999	17	do	SS GHSS Kot Najeebulla Hari Pur	
81	Tahir Zaman M.A B.Ed	19/06/1971	Bannu	17/02/2000	17/02/2000	17	do	SS GHSS Katgarh DIKhan	
82	Arshad Mehmood , M.Sc B.Ed	05/12/1972	Haripur	18/11/1999	18/11/1999	17	do	SS, GHSS, No 1 Hari Pur	
83	Muhammad Khalil M.A B.Ed	05/04/1963	Bannu	18/11/1999	18/11/1999	17	do	SS GHSS Esak Khel Lakki	
84	Sadar Shaheed M.A B.Ed	08/03/1972	FR Bannu	03/07/1999	03/07/1999	17	do	SS GHSS Umerzai Charsadda	
85	Eid Ullah M.A B.Ed	04/01/1973	karak	01/07/1997	18/11/1999	17	do	SS GHSS Sherpao Charsadda	
86	Rabib Khan M.A B.Ed	08/09/1966	SWA	18/11/1999	18/11/1999	17	do	SS GHSS Sheringal Dir U	
87	Rahat Ullah M.A B.Ed	07/05/1968	Dir	10/07/1999	10/07/1999	17	do	SS GHSS Mathra Peshawar	
88	Basit Saleem Shah M.A B.Ed	28/12/1969	Peshawar	10/07/1999	10/07/1999	17	do	SS GHSS Mathra Peshawar	
89	Sayed Mohsin Shah M.A B.Ed	08/03/1963	Malakand	01/11/1981	03/07/1999	17	do	SS GHSS Kot Malakand.	
90	Muhammad Farooq Khan M.A B.Ed	05/04/1967	Swabi	07/10/1995	25/11/1999	17	do	SS GHSS Totalai Bunir	
91	Iqbal Ahmad M.A B.Ed	27/04/1969	Peshawar	03/07/1999	03/07/1999	17	do	SS GHSS Khairabad Nowshera	
92	Ajmal Ahmed M.A B.Ed	16/03/1970	Mansehra	10/07/1999	10/07/1999	17	do	SS GHSS Bathal Mansehra	
93	Muhammad Luqman M.A B.Ed	04/02/1972	Kohat	25/11/1999	25/11/1999	17	do	SS GHSS Usterzai Kohat	
94	Amir Attique Sadique M.A B.Ed	06/02/1972	Haripur	25/11/1999	25/11/1999	17	do	SS GHSS Beer Haripur	
95	Muhammad Amin Syed M.A B.Ed	03/06/1972	Peshawar	25/11/1999	25/11/1999	17	do	SS GHSS Mathra Peshawar	
96	Muhammad Idrees M.A B.Ed	01/03/1970	Nowshera	25/11/1999	25/11/1999	17	do	SS GHSS Jalozai Nowshera	
97	Muhammad Asif Jan M.A B.Ed	02/05/1972	Charsadda	25/11/1999	25/11/1999	17	do	SS GHSS Oosehra Charsadda	
98	Muhammad Sohail M.A B.Ed	20/05/1971	Peshawar	03/07/1999	03/07/1999	17	do	SS GHSS Ustarzai Payan Kohat	
99	Younas Ali Shah M.A B.Ed	20/03/1964	BANNU	10/07/1999	10/07/1999	17	do	SS GHSS Mamash Khel Bannu	
100	Amir Muhammad Khan M.A B.Ed	04/04/1965	karak	10/07/1999	10/07/1999	17	do	SS GHSS G.Chishma Chitral	
101	Sohail Manzoor M.A B.Ed	01/02/1966	Abbottabad	10/07/1999	10/07/1999	17	do	SS GHSS Sagnoter A/Abad	
102	Khan Bad Shah M.A B.Ed	12/02/1967	Swabi	25/11/1999	25/11/1999	17	do	SS GHSS Hazra Khwani Peshawar	
103	Dost Muhammad M.A B.Ed	01/01/1963	karak	10/07/1999	10/07/1999	17	do	SS GHSS Lachi Kohat	
104	Muhammad Saleem M.A B.Ed	25/03/1968	Swabi	06/12/1990	03/07/1999	17	do	SS GHSS Risalpur Nowshera	
105	Shah Jehan Afridi M.A B.Ed	20/03/1969	Khy Agency	10/07/1999	10/07/1999	17	do	SS GHSS Jalozai Nowshera	
106	Masud M.A B.Ed	04/07/1969	Swabi	12/07/1998	18/11/1999	17	do	SS GHSS Kabgani Swabi	
107	Muhammad Ayaz M.A B.Ed	02/03/1971	MKD Agency	01/03/1998	25/11/1999	17	do	SS GHSS Palai Malakand	
108	Kamin Khan M.A B.Ed	10/03/1971	Dir	12/04/1990	10/07/1999	17	do	SS GHSS Wari Dir U	
109	Mukhtar Gul M.A B.Ed	10/04/1971	MKD Agency	11/10/1994	10/07/1999	17	do	SS GHSS Kot Malakand	
110	Hizb Ur Rehman M.A B.Ed	14/01/1964	Nowshera	25/04/1992	25/11/1999	17	do	SS GHSS Kheshgi Nowshera	
111	Akbar Ullah M.A B.Ed	08/03/1968	MKD Agency	25/11/1999	25/11/1999	17	do	SS GHSS Pir Sadi Mardan	
112	Sair Ul Islam M.A B.Ed	10/10/1968	karak	05/09/1996	25/11/1999	17	do	SS GHSS Shekhan Peshawar	
113	Ayaz Akbar Khan M.A B.Ed	28/02/1969	Haripur	17/02/2000	17/02/2000	17	do	SS GHSS Kot Najeebulla Hari Pur	
114	Rahmat Ullah M.A B.Ed	07/03/1970	FR Bannu	25/05/1999	25/11/1999	17	do	SS GHSS Gumbat Kohat	
115	Ifitikhar, Ali M.A B.Ed	01/04/1970	Swat	25/11/1990	25/11/1999	17	do	SS GHSS Fatehpur Swat	

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Sl. No.	Name with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appoinment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
116	M. A. B. Ed	10/03/1971	FR Bannu	17/03/1999	25/11/1999	17	D/Selectee	SS GHSS Paroa D.I.K.	
117	M. A. B. Ed	15/02/1959	FR Bannu	19/03/1990	03/07/1999	17	do	SS GHSS Bilitang Kohat	
118	M. A. B. Ed	10/04/1964	Abbottabad	01/09/1984	03/07/1999	17	do	SS GHSS Bhagnoter A/Abad	
119	M. A. B. Ed	04/12/1965	Swat	14/11/1988	03/07/1999	17	do	SS GHSS Totalai Buner	
120	M. A. B. Ed	04/04/1970	FR Bannu	03/07/1999	03/07/1999	17	do	Astt: Director P&D Directorate of ESE	
121	M. A. B. Ed	25/03/1967	Peshawar	03/07/1999	03/07/1999	17	do	SS GHSS Risalpur Nowshera	
122	M. A. B. Ed	01/01/1971	Swabi	14/02/1996	10/07/1999	17	do	SS GHSS Zaida Swabi	
123	M. A. B. Ed	03/02/1964	Mardan	03/07/1999	03/07/1999	17	do	SS GHSS Pir sadi Mardan	
124	M. A. B. Ed	05/02/1964	Mansehra	16/12/1989	10/07/1999	17	do	SS GHSS Sherpur Mansehra	
125	M. A. B. Ed	02/06/1964	Abbottabad	18/12/1999	18/11/1999	17	do	SS GHSS Jareed Mansehra	
126	M. A. B. Ed	10/02/1968	Lakki	10/07/1999	10/07/1999	17	do	SS GHSS Pir Pai Nowshera	
127	M. A. B. Ed	22/02/1968	Mardan	03/07/1999	03/07/1999	17	do	SS GHSS Palo Dheri Mardan	
128	M. A. B. Ed	03/03/1968	Swabi	11/04/1996	18/11/1999	17	do	SS GHSS Khair abad Nowshera	
129	M. A. B. Ed	13/04/1968	karak	24/10/1989	03/07/1999	17	do	SS GHSS Shakardara Kohat	
130	M. A. B. Ed	15/02/1969	SWA	03/07/1999	03/07/1999	17	do	SS GHSS Togh Bala Kohat	
131	M. A. B. Ed	01/04/1970	Mansehra	13/11/1994	10/07/1999	17	do	SS GHSS L. Nawab Mansehra	
132	M. A. B. Ed	03/11/1970	Swat	10/07/1999	10/07/1999	17	do	SS GHSS Mingawara Swat	
133	M. A. B. Ed	12/04/1971	Dir	03/07/1999	03/07/1999	17	do	SS GHSS Sheringal Dir U	
134	M. A. B. Ed	03/01/1961	Dir	03/07/1999	03/07/1999	17	do	SS GHSS Samar Bagh Dir L	
135	M. A. B. Ed	27/10/1968	MKD Agency	25/11/1999	25/11/1999	17	do	SS GHSS Paiai MKD	
136	M. A. B. Ed	03/11/1969	Mardan	25/11/1999	25/11/1999	17	do	SS GHSS Garii Kapur Mardan	
137	M. A. B. Ed	30/09/1964	Peshawar	25/11/1999	25/11/1999	17	do	SS GHSS Bagnoter A/Abad	
138	M. A. B. Ed	20/08/1963	Dir	03/07/1999	03/07/1999	17	do	SS GHSS No.1 Mardan	
139	M. A. B. Ed	12/10/1964	Peshawar	03/07/1999	10/07/1999	17	do	SS GHSS Wazir Bagh Peshawar	
140	M. A. B. Ed	04/04/1963	Mardan	03/07/1999	03/07/1999	17	do	SS GHSS Garhi Kapura Mardan	
141	M. A. B. Ed	20/03/1964	Swat	16/04/1990	10/07/1999	17	do	SS GHSS Ouch Dir L	
142	M. A. B. Ed	01/03/1964	karak	31/01/1991	03/07/1999	17	do	SS GHSS Doaba Kohat	
143	M. A. B. Ed	10/05/1965	karak	22/10/1989	03/07/1999	17	do	SS GHSS Lai Qila Dir L	
144	M. A. B. Ed	05/04/1968	karak	19/04/1994	03/07/1999	17	do	SS GHSS Umefzai Charsadda	
145	M. A. B. Ed	02/04/1969	Moh: Agy	03/07/1999	03/07/1999	17	do	SS GHSS Kalaya OrakAg	
146	M. A. B. Ed	11/01/1971	Lakki	03/07/1999	03/07/1999	17	do	SS GHSS Sarai Norang Lakki	
147	M. A. B. Ed	24/05/1967	Moh: Agy	03/07/1999	03/07/1999	17	do	SS GHSS Sherpao Charsadda	
148	M. A. B. Ed	04/12/1966	karak	06/11/1999	25/11/1999	17	do	SS GHSS Ustarzai Kohat	
149	M. A. B. Ed	03/04/1968	Mansehra	25/11/1999	25/11/1999	17	do	SS GHSS Sherpur Mansehra	
150	M. A. B. Ed	02/04/1967	Chitral	07/05/1992	03/07/1999	17	do	SS GHSS Drosh Chitra	
151	M. A. B. Ed	10/10/1967	Bannu	25/11/1999	25/11/1999	17	do	SS GHSS Esak Khet Lakki	
152	M. A. B. Ed	01/08/1968	Dir	20/12/1992	25/11/1999	17	do	SS GHSS Z. Talash Dir L	
153	M. A. B. Ed	07/07/1970	swat	25/11/1999	25/11/1999	17	do	SS, GHSS, Kishawra Swat	
154	M. A. B. Ed	01/03/1972	Haripur	25/05/2000	25/05/2000	17	do	SS, GHSS, Kot Najibullah, A/Abad	
155	M. A. B. Ed	15/02/1973	Haripur	25/11/1999	25/11/1999	17	do	SS, GHSS, Haripur	
156	M. A. B. Ed	04/12/1969	Abbottabad	24/07/1993	25/05/2000	17	do	SS, GHSS, Bagra Haripur	

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Sl. No.	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recriutment		
157	Muhammad Tufail, M.A B.Ed	10/04/1973	Moh:Agy	25/05/2000	25/05/2000	17	D/Selectee	SS, GHSS< Dosehra. CHD:	
158	Faridul Malik M.A B.Ed	28/12/1972	Abbottabad	03/04/2000	03/04/2000	17	do	SS AD(P&D) L/Directorate.	
159	Muhammad Khan M.A B.Ed	05/04/1973	Nowshera	03/01/2000	03/01/2000	17	do	SS GHSS PirPai Nowshera	
160	Muhammad M.A B.Ed	05/06/1969	Charsadda	03/03/2000	03/02/2000	17	do	SS GHSS No 2 Peshawar Cantt	
161	Muhammad Khan, M.A B.Ed	07/06/1972	Moh: Agy	07/01/1998	25/05/2000	17	do	SS, GHSS, Chamkani, Peshawar	
162	Muhammad Ahmad, M.A B.Ed	17/08/1971	karak	03/01/2000	03/01/2000	17	do	SS, GHSS, Karak	
163	Muhammad Amin M.A M.Ed	01/04/1973	Mardan	03/04/2000	03/04/2000	17	do	SS GHSS Nawasher ATD	
164	Muhammad Anan M.A B.Ed	01/10/1972	Swabi	03/04/2000	03/04/2000	17	do	SS GHSS Kheshgi NSR	
165	Muhammad Zahir Shah M.A B.Ed	25/05/1968	karak	01/02/1995	03/04/2000	17	do	SS GHSS Jehangira Banda Karak	
166	Muhammad Akbar M.A B.Ed	02/04/1969	Moh: Agy	25/05/2000	25/05/2000	17	do	SS, GHSS, Khair Abad, Nowshera	
167	Muhammad Israr Khan M.A B.Ed	15/03/1972	NWA	03/01/2000	03/01/2000	17	do	SS GHSS Eidak NWA	
168	Muhammad Bakhtiar M.A B.Ed	04/05/1972	Dir	03/04/2000	03/04/2000	17	do	SS GHSS Lal Qilla Dir L	
169	Muhammad Hussain M.A B.Ed	01/05/1970	Mardan	03/01/2000	03/01/2000	17	do	SS GHSS Manag Dargai Charsadda	
170	Muhammad Ahmad M.A B.Ed	25/03/1968	Mansehra	03/11/2000	03/11/2000	17	do	HM GHS Kirosum Kohat	
171	Muhammad Hussain M.A B.Ed	15/06/1970	Abbottabad	03/04/2000	03/04/2000	17	do	SS GHSS Berote A. Abad	
172	Muhammad Ali Khan M.A B.Ed	24/11/1962	FR Bannu	03/04/2000	03/04/2000	17	do	SS GHSS Borara Karak	
173	Muhammad Ul Hasnain M.A B.Ed	01/02/1966	Kurram Agy	03/04/2000	03/04/2000	17	do	SS GHSS Palodheri Mardan	
174	Muhammadoodur Rehman M.A B.Ed	01/04/1968	FR Bannu	03/04/2000	03/04/2000	17	do	SS GHSS Warana Karak	
175	Mr Fatch Gul M.A B.Ed	10/03/1955	Bajour Agy	15/09/1976	31/08/2000	17	By Promotion	HM GHSS, Gardi FR Bannu	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 326/2001
176	Mr Feroz Ahmad B.A B.Ed	10/04/1954	Bannu	11/12/1976	31/08/2000	17	do	HM GHS, Nurar Bannu	SET S.No 340/2001
177	Mr Rahim Ullah B.A B.Ed	02/02/1955	Mardan	18/02/1976	31/08/2000	17	do	HM GHS, Charorai Buner	SET S.No 347/2001
178	Mr Muhammad Tahir M.A B.Ed	01/11/1953	Mardan	20/12/1976	31/08/2000	17	do	HM GHS, Palosai Mughdarzai Pesh:	sen.aw.vd so(s)1-5/2007 dt 30-10-08 SET S.No 348/2001
179	Mr Sikandar Khan B.A B.Ed	21/03/1954	Abbottabad	24/12/1976	31/08/2000	17	do	HM GHS, Malsa A.Abad	SET S.No 352/2001
180	Mr Habibur Rehman B.A B.Ed	15/02/1953	D.I.Khan	20/01/1977	31/08/2000	17	do	HM GHS, Kurai DI Khan	SET S.No 357/2001
181	Mr Ghulam Saddiq B.A B.Ed	16/06/1953	D.I.Khan	03/03/1977	31/08/2000	17	do	HM GHS, Naivela DI Khan	SET S.No 367/2001
182	Mr Abdul Hamim B.A B.Ed	25/04/1954	SWA	03/01/1978	31/08/2000	17	do	HM GHS, Spin Khak SWA	SET S.No 418/2001
183	Mr Momer Hayat B.A B.Ed	08/09/1954	Bannu	29/01/1978	31/08/2000	17	do	HM GHS, Shana Wari Narayan Kohat	SET S.No 419/2001
184	Mr Zafrullah Khan B.A B.Ed	05/05/1954	Moh: Agy	20/10/1976	31/08/2000	17	do	HM GHS, Pindayali Mohmand Agency	SET S.No 444/2001

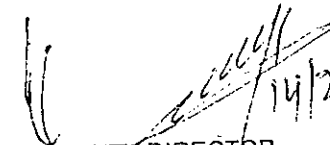
AMENDED
REJECTED

SR.No	Name of Officers with Qualification	D/O Birth	Domicile	Date of 1st; Entry in Edu; Deptt;	Regular appionment / Promtion to the present post			Designation/Place of Posting	Remarks
					Date	BPS	Method of Recruitment		
1878	Bahramand Khan BA BEd	02/04/1960	Buner	17/12/1987	24/01/2011	17	By Promotion	HM GHS Topai Buner	Notification No.SO(P1) 6/E&SE/DPC Meeting/2010 dated 27.03.2010
1879	Abdul Latif SET (Tech)	05/09/1961	Swabi	17/12/1987	24/01/2011	17	do	HM GHS Jhanda Swabi	Notification No.SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010
1880	Khan Bahadar MA BEd	15/04/1955	Malakand	07/12/1978	24/01/2011	17	do	HM GHS Agra Malakand	Notification No.SO(PE)2-6/E&SE/DPC Meeting/2010: dated 27.03.2010

CERTIFICATE:-

It is certified that the Seniority List is final and undisputed.

ATTESTED



 14/2/2013
 DEPUTY DIRECTOR
 ELEMENTARY & SECONDARY EDUCATION
 KHYBER PAKHTUNKHWA

(16)

Annexure - B.



Haji Nisar Muhammad President SOA
Sami Ullah Khalil G. Secretary SOA
Zakir Ullah Shah S.V.P SOA

GOVT: OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
NO. BOV/FD/2-112/2011/04-Tier Formula.
Dated Peshawar the 28th February, 2012.

To

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

Subject: -
Dear Sir,

UPDATION OF 04 TIER FORMULA.

I am directed to refer to your Department letter No. SO(S/M) E&SED/7-34/2012/4-Tier Structure dated 01-02-2012 on the subject noted above and to state that consequent upon the approval of the competent authority Finance Department agrees to the updation of total sanctioned strength of 5164 posts i.e. BPS-20, BPS-19, BPS-18 and BPS-17 (as on 30-09-2009) of the Teaching cadre of Elementary & Secondary Education Department, on the basis of 04-Tier Formula, carrying the Ratio of 01:15:34:50, subject to the observance of all codal formalities. The 04-Tier formula was approved and introduced previously vide Finance Department letter No. FD (SR-I) 1-41/91 dated 15-11-1992. The current updation/up gradation shall be effective in two phases, as per details elaborated below.

BPS	Existing Position			Total Up gradation Due			Total Additionality		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
BPS-20	9	4	13	36	15	51			
BPS-19	175	28	204	541	233	774	(+)27	(+)11	(+)38
BPS-18	480	119	599	1228	528	1756	(+)365	(+)205	(+)570
BPS-17	2946	1402	4348	1806	777	2583	(+)748	(+)409	(+)1157
Total	3611	1553	5164	3611	1553	5164	-1140	-625	-1765
	1st Phase effective from 01-07-2012			IInd Phase effective from 01-07-2013			Over all position on 01-07-2013		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
BPS-20	13	6	19	13	6	19			
BPS-19	183	102	285	183	102	285	(+)26	(+)12	(+)38
BPS-18	374	205	579	374	204	578	(+)566	(+)204	(+)570
BPS-17	-570	-313	-883	-570	-313	-882	(+)748	(+)409	(+)1157
Total	0	0	0	0	0	0	-1140	-625	-1765

I am to state that Finance Department further agrees to the up gradation of a total 1765 in BPS-20, BPS-19 and BPS-18 in two phases by abolishing equal number of posts in BPS-17, as per details given below.

BPS	w.e.f 01-07-2012			w.e.f 01-07-2013			Total of both phases.		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
BPS-20	13	6	19	13	6	19			
BPS-19	183	102	285	183	102	285	26	12	38
BPS-18	374	205	579	374	204	578	366	204	570
BPS-17	-570	-313	-883	-570	-313	-882	748	409	1157
Total	0	0	0	0	0	0	-1140	-625	-1765

Attested
ATTESTED

PTO

(17)

Annexure - C

Directorate of Elementary & Secy Education
Khyber Pakhtunkhwa, Peshawar.

No. 5287-91 /A-12/Estt-1/4 - tier.
Dated Peshawar the 31/3 /2012.

To

1. Director of Education
(FATA) Peshawar.
2. Director Curriculum & Teacher Education
Khyber Pakhtunkhwa Abbottabad.
3. Director PITE
Khyber Pakhtunkhwa Peshawar.
4. All Principals
RITE (M & F) in Khyber Pakhtunkhwa.
5. All the Executive District Officers
E&S Education In Khyber Pakhtunkhwa.

Subject: **UPDATION OF 4-TIER FORMULA.**

Memo:

I am directed to refer to the subject noted above and to state that all the Principals / HMs / SSs (Male & Female) in B-17 & above in respective districts may be asked to provide the following information to this office at the earliest:-

- 1) BIO DATA (Length of Service)
- 2) NIC & SSC Attested Copy.
- 3) Non Involvement Certificate.
- 4) Ten (10) Photographs Passport size.
- 5) A.C.R. (Complete period of the present scale).

	<u>MALE</u>	<u>FEMALE</u>
Bps-17	Ist Apptt: upto 2006	Ist Apptt: Upto 2008
BPS-18	All Present Officers	All Present Officers.
BPS-19	Ist Apptt: upto 2004	Ist Apptt: upto 2008

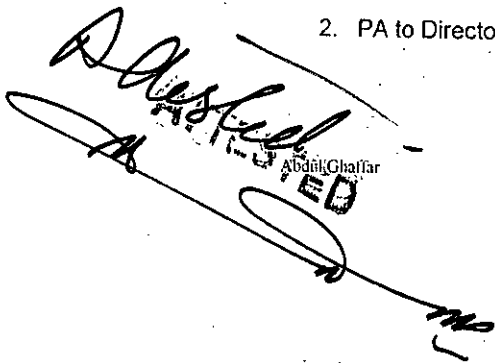

Dy: Director (Estt:)

E.No. 5292-93

Copy of the above is forwarded to the:-

1. Mr.Haji Nisar Muhammad President and Mr.Sami Ullah Khalil General Secretary
of Schools Officers Association Khyber Pakhtunkhwa.
2. PA to Director E&S Education Khyber Pakhtunkhwa Peshawar.


Dy: Director (Estt:)


Abdul Ghaffar
DIRECTOR

18
Annexure - D.

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR



NOTIFICATION.

Sanction is hereby accorded to the grant of encashment of L.P.R with effect from 01.11.2012 to 31.10.2013 (365 days) in respect of Mohammad Tahir Headmaster (BPS-17) Govt: High School Palosi Maghdar Zai, District Peshawar as due and admissible to him under the Revised Leave Rules 1981, and as per leave admissibility report issued by the Accountant General Khyber Pakhtunkhwa in pursuance of delegation of powers vested upon the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar by the competent authority vide Notification No.SOG/E&SED/1-16/2013 dated 20.08.2013.

The officer concerned shall stand retired on 31.10.2013 A.N on superannuation.

(DIRECTOR)
ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

Endst: No. 3938-41 15 LPR. Dated: 16/9/13

Copy of the above is forwarded to the:-

1. District Education Officer (M) Peshawar w/r to his No.2341 dated 05.09.2013.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Mohammad Tahir H/M G.H.S Palosi Maghdar Zai Peshawar.
4. P.A to Director Elementary & Secy: Edu: Khyber Pakhtunkhwa.

Subscribed
TESTED
M

16/9/2013
Deputy Director (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar,



Amesure E.

19

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

(Dated Peshawar the April 25, 2014)

NOTIFICATION

NO.SO(S/M) E&SED/1-3/2013/Promotion BS-17 to BS-18: The Competent Authority on the recommendations of the Provincial Selection Board is pleased to promote/appoint the following (353) Officers of Teaching Cadre of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect as under except Sr. No. 67 & 99.

Sr.#	Name	Sr.#	Name	Sr.#	Name
1	Mr. Umar Muhammad	2	Mr. Mubarak Shah	3	Mr. Saeed-ur-Rahman
4	Mr. Muhammad Zaman	5	Mr. Umar Nawaz Khan	6	Mr. Ihsan-ud-Din
7	Syed Shoukat Shah	8	Mr. Sultan Syed	9	Mr. Younas Ali
10	Mr. Muhammad Farooq	11	Mr. Gul Farooq Khan	12	Mr. Sheraz Ahmad
13	Mr. Muhammad Parsa	14	Mr. Muhammad Nawaz	15	Mr. Rayat Khan
16	Mr. Fakhri Alam.	17	Mr. Niaz Ahmad.	18	Mr. Wilayat Khan
19	Mr. Ishtiaq Ahmad	20	Mr. Mansoor Ahmad	21	Mr. Muhammad Shoaib Khan
22	Mr. Naveed Ahmad	23	Mr. Abdul Qadir	24	Mr. Khalid Mahmood
25	Mr. Abid Ullah Shah	26	Mr. Gul Hussain Shah	27	Mr. Muhammad Rahman
28	Mr. Farzand Ali Shah	29	Mr. Inayat-ur-Rehman	30	Mr. Muhammad Mehdi Shah
31	Mr. Zia Ullah	32	Mr. Muhammad Tariq Bhatti.	33	Mr. Sultan Muhammad
34	Mr. Hakim Ullah	35	Mr. Fida Muhammad	36	Mr. Arif Iqbal
37	Muhammad Zaheer	38	Mr. Mumtaz Saddiqi	39	Mr. Muhammad Sajjad
40	Mr. Muhammad Tahir	41	Mr. Abdul Nasir Khan	42	Mr. Muhammad Abid Jan
43	Mr. Zahid Amin	44	Mr. Fida Muhammad	45	Mr. Wasi Ullah
46	Mr. Hamd Ullah Jan	47	Mr. Azhar Hussain Shah.	48	Mr. Muhammad Arif.
49	Mr. Ihsan Ahmad	50	Mr. Muhammad Yousaf	51	Mr. Gul Nawaz Khan
52	Mr. Nigar Ahmad	53	Mr. Basharat Khan	54	Basharat Ahmad
55	Mr. Tahir Zaman	56	Mr. Arshad Mehmood	57	Mr. Muhammad Khalil
58	Mr. Sadar Shaheed	59	Mr. Eid Ullah	60	Mr. Rabib Khan.

Attested
[Signature]

[Signature]
25/04/14

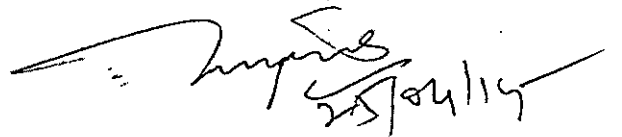
Sr.#	Name	Sr.#	Name	Sr.#	Name
61	Mr. Rahat Ullah	62	Syed Mohsin Shah	63	Mr. Iqbal Ahmad
64	Mr. Ajmal Ahmad	65	Mr. Muhammad Luqman.	66	Mr. Amir Attique Saddique
67	Mr. Muhammad Idrees	68	Mr. Muhammad Sohail	69	Mr. Younas Ali Shah
70	Mr. Amir Muhammad Khan	71	Mr. Sohail Manzoor	72	Mr. Dost Muhammad
73	Mr. Muhammad Salim	74	Mr. Shah Jehan Afridi	75	Mr. Masud
76	Mr. Muhammad Ayaz	77	Mr. Kamin Khan	78	Mr. Mukhtar Gul
79	Mr. Hizb-ur-Rehman	80	Mr. Akbar Ullah	81	Mr. Rahmat Ullah
82	Mr. Iftikhar Ali	83	Farid Ullah	84	Mr. Amrullah
85	Mr. Muhammad Nawaz	86	Mr. Muhammad Hanifa	87	Mr. Sher Daraz Khan
88	Mr. Shakir-ur-Rehman	89	Mr. Faqir Muhammad	90	Mr. Pir Zahir Shah
91	Mr. Muhammad Sajjad	92	Mr. Muhammad Bashir Khan	93	Mr. Fateh Ullah Khan
94	Mr. Ashraf Ali	95	Mr. Shafiq un Nabi	96	Mr. Nasir Mahmood
97	Mr. Amir Muhammad	98	Mr. Zulfiqar Ahmad	99	Mr. Momin Khan
100	Mr. Abid Ali	101	Mr. Shahab Uddin	102	Mr. Jameel Ahmad
103	Mr. Niaz Ali Khan	104	Mr. Ihsan ul Jah	105	Mr. Shaffi Gul
106	Mr. Nasir Muhammad	107	Mr. Inayat Ullah	108	Mr. Said Bad Shah
109	Mr. Riaz Gul	110	Mr. Shabir Ahmad	111	Mr. Muhammad Tahir Rahim
112	Mr. Sharif Ullah Khan	113	Mr. Naseer Muhammad	114	Mr. Lais Khan
115	Mr. Muhammad Shehzad	116	Mr. Muhammad Salim	117	Mr. Nasir Ahmad
118	Mr. Shoukat Ali	119	Mr. Ejaz Ahmad	120	Mr. Inayat ur Rehman
121	Mr. Muhammad Tufail	122	Mr. Sudheer Khan	123	Mr. Muhammad Amin
124	Mr. Zari Aman	125	Mr. Muhammad Zahir Shah	126	Mr. Said Akbar
127	Mr. Muhammad Israr Khan	128	Mr. Iqbal Hussain	129	Mr. Iftikhar Ahmad
130	Mr. Altaf Hussain	131	Mr. Dost Ali Khan	132	Mr. Zia ul Hasnain
133	Mr. Mehmood ur Rehman	134	Mr. Feroz Ahmad	135	Mr. Rahim Ullah
136	Mr. Sikandar Khan	137	Mr. Umer Hayat	138	Mr. Rehmat Ullah
139	Mr. Ghulam Rasool	140	Mr. Gul Chaman	141	Mr. Iqbal Said
142	Mr. Inayat Ullah	143	Mr. Zahoor Ullah	144	Mr. Khan Badshah
145	Mr. Qayyum Nawaz	146	Mr. Samandar Khan	147	Mr. Badruz Zaman
148	Mr. Muhammad Bukhar	149	Mr. Said Zarin	150	Mr. Mumtaz Khan

Attended/STED

25/04/19

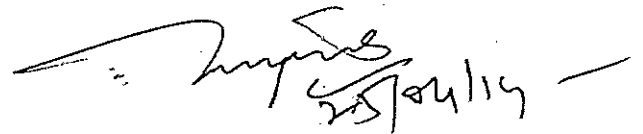
Sr.#	Name	Sr.#	Name	Sr.#	Name
151	Mr. Hamid Hussain	152	Mr. Taseer Jan	153	Mr. Muzammil Shah
154	Mr. Latif ur Rehman	155	Mr. Akbar Jan	156	Mr. Muhammad Humayun
157	Mr. Fazalur Rehman	158	Mr. Younas Ali	159	Mr. Badish Khan
160	Mr. Mir Alam Khan	161	Mr. Feroz Khan	162	Mr. Rab Nawaz
163	Mr. Jalaludin	164	Mr. Safdar Ali	165	Mr. Rooh Ullah
166	Mr. Wasiq Saeed	167	Mr. Muhammad Riaz	168	Mr. Muhammad Saleem
169	Mr. Muhammad Daud Shah.	170	Mr. Abdullah Jan	171	Mr. Islam Khan
172	Mr. Gulzar Ali	173	Mr. Ikram Ullah	174	Mr. Sawar Jan
175	Mr. Gul Roshan Din	176	Mr. Fazal Shah	177	Mr. Muhammad Pervez
178	Mr. Abdul Hameed	179	Mr. Muhammad Rehman	180	Mr. Umer Jan
181	Mr. Habibur Rehman	182	Mr. Iqbal Muhammad	183	Mr. Shahid Hayat
184	Mr. Muhammad Rauf	185	Mr. Saif Ullah	186	Mr. Ajmal Khan
187	Mr. Juma Gul Shah	188	Mr. Shaukat Ali	189	Mr. Muhammad Sadat Khan
190	Mr. Feroz Shah	191	Mr. Gul Zaman	192	Mr. Shujat Ali Khan
193	Mr. Falak Naz	194	S. Hidayat Ali Shah	195	Mr. Gul Baz Khan
196	Mr. Farid Ullah Khan	197	Mr. Muhammad Aziz Ullah	198	Mr. Najeeb Ullah
199	Mr. Muhammad Younis Khan	200	Mr. Sarfaraz Khan	201	Mr. Raham Zada
202	Mr. Kaleem Ullah	203	Mr. Noor Khan	204	Mr. Shairoz Khan
205	Mr. Muhammad Iqbal	206	Mr. Ghafoor-ur-Rehman	207	Mr. Zahid Ullah
208	Mr. Haroon Rashid	209	Mr. Anwar Jan	210	Mr. Muhammad Zia
211	Mr. Muhammad Ashraf	212	Mr. Sana Ullah	213	Mr. Hamid Ullah
214	Mr. Muhammad Rashad	215	Mr. Gulzar Khan	216	Mr. Nisar Muhammad
217	Mr. Abdul Samad	218	Mr. Kaleem Ullah	219	Mr. Altaf Hussain Shah
220	Mr. Muhammad Saleem	221	Mr. Saifullah	222	Mr. Aqal Mond
223	Mr. Jehanzeb	224	Mr. Hameed Ullah	225	Mr. Riaz Ali
226	Mr. Zahid Ullah Shah	227	Mr. Shah Imtiaz	228	Mr. Ayub Khan
229	Mr. Muhammad Kamal	230	Mr. Faizullah	231	Mr. Aleem Shah
232	Mr. Bashir Ahmad	233	Mr. Zair Gul	234	Mr. Pinda Khan
235	Mr. Ishaq Hussain	236	Mr. Muhammad Yousaf	237	Mr. Farid Ullah Khan
238	Mr. Fazle Subhan	239	Mr. Aminul Haq	240	Mr. Ajmir Khan

Attended



 25/04/15

Sr.#	Name	Sr.#	Name	Sr.#	Name
241	Mr. Gul Diat Khan	242	Mr. Sher Afzullah	243	Mr. Rahim Zada
244	Mr. Ibrar Ahmad	245	Mr. Noorul Basar	246	Mr. Ahmad Sultan
247	Mr. Muhammad Shafiq	248	Mr. Ali Gohar	249	Mr. Khizar Hayat
250	Mr. Qaiser Abbas	251	Mr. Mir Qalam Khan	252	Mr. Amanullah
253	Mr. Sharif Ullh	254	Muhammad Arif Khattak	255	Mr. Islam Ali,
256	Mr. Muhammad Anis	257	Mr. Muhammad Tariq	258	Mr. Hasnain Ali
259	Mr. Gul Muhammad	260	Mr. Abdul Monim	261	Mr. Aqal Gul
262	Mr. Gul Zahir Shah	263	Mr. Gohar Khan	264	Mr. Izhar Ali
265	Mr. Muhammad Ramzan	266	Mr. Ghulam Rasool	267	Mr. Muhammad Pervez
268	Mr. Raza Muhammad	269	Mr. Sher Nawaz	270	Mr. Fazal Qayyum
271	Mr. Zafa ullah Khan	272	Mr. Sahib Zada	273	Mr. Atlas Noor
274	Mr. Ghulam Daud	275	Mr. Nasir Khan	276	Mr. Zakir Mehmood
277	Mr. Shahid Khan	278	Mr. Muhammad Imtiaz	279	Mr. Abdul Qayyum
280	Mr. Attaur Rehman	281	Mr. Abdur Rehman	282	Mr. Javed Khan
283	Mr. Sher Ali Salam	284	Mr. Muhammad Yaseen	285	Mr. Muhammad Latif
286	Mr. Javed Ali Khan	287	Mr. Muhammad Ayaz	288	Mr. Tajamul Hussain
289	Mr. Alam Zeb	290	Mr. Abdul Haleem	291	Mr. Saif-ur-Rehman
292	Mr. Muhammad Saleem	293	Mr. Taj Nabi	294	Mr. Ghulam Akbar
295	Mr. Sabz Ali	296	Mr. Dilawar Khan	297	Mr. Farooq Ahmad
298	Mr. Muhammad Raziq	299	Mr. Shabir Hussain Shah	300	Mr. Sami Ullah Khan
301	Mr. Imal Khan	302	Mr. Muhammad Shaiq	303	Mr. Muhammad Sadique
304	Mr. Muhammad Altaf Hussain	305	Mr. Zee Gohar Saeed	306	Mr. Riaz Ahmad
307	Mr. Muhammad Sadique	308	Mr. Muhammad Shoaib	309	Mr. Mushtaq Ahmad
310	Mr. Ghulam Sarwar	311	Mr. Muhammad Saleem	312	Mr. Jehangir Khan
313	Mr. Muhammad Zafar Pervez	314	Mr. Khalil-ur-Rehman	315	Mr. Attiq-ur-Rehman
316	Mr. Lais Muhammad	317	Mr. Aman Ullah	318	Mr. Abdul Qayyum
319	Mr. Shah Zarin	320	Mr. Zahid Zaman	321	Mr. Khurshid Khan
322	Mr. Asmat Ullah	323	Mr. Malik Khan	324	Mr. Abdul Majid
325	Mr. Aziz ulhaq	326	Mr. Muhammad Waheed	327	Mr. Safdar Khan
328	Mr. Shabir Ahmad	329	Qazi Muhammad Amir	330	Mr. Bahadur Zaman
331	Mr. Ihsan ud Din	332	Mr. Hafeez Ullah Khan	333	Mr. Awalyaz

APPROVED



 25/04/19

Sr.#	Name	Sr.#	Name	Sr.#	Name
334	Mr. Muhammad Shoaib	335	Mr. Saif Ullah	336	Mr. Fida Muhammad
337	Mr. Hameed Khan	338	Mr. Muhammad Aurangzeb	339	Mr. Abdul Latif
340	Mr. Muhammad Inam	341	Mr. Muhammad Iqbal	342	Mr. Mislahuddin
343	Mr. Abdul Khaliq	344	Mr. Gul Muhammad	345	Mr. Hazrat Hussain
346	Mr. Shafi ul Haq	347	Mr. Muhammad Sher Khan	348	Mr. Khalid Khan
349	Mr. Shaida Muhammad	350	Mr. Fazal Wali	351	Mr. Haq Nawaz
352	Mr. Ismat Ullah	353	Mr. Hameed Ullah.		

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servent Act, 1973 read with rule-15(1) of the Khyber Pahtunkhwa Civil Servent (Appointment, Promotion & Transfer) rules, 1989 the above male officers of the Teaching Cadre on their promotion shall be on probation for a period of one year.

3. Consequent upon the above, the following postings/transfers are hereby ordered henceforth.

PROMOTION FROM B-17 TO B-18 MALE			
S#	Name of Officer with Designation	Proposed Place of Posting	Remarks.
1	Umar Muhammad , SS(PS),GHSS Khawaza Khela Swat.	Principal B-18 GHSS Qamber Swat.	Vice Muhammad Amin Promoted to B-19
2	Mubarak Shah, SS(Chemistry) GHSS No, 4 Mardan	SS (Chemistry) BS-18 No. 4 Mardan	Already occupied by him
3	Saeed Ur Rehman SS (Stat) GHSS Urmar Payan Peshawar	SS (Stat) B-18 GHSS No.1 Peshawar Cantt	Against Vacant Post
4	Muhammad Zaman , HM B-17 GHS Ranai Dir Lower	Principal B-18 GHS Tore Mang Dir Lower	Against Vacant Post
5	Umar Nawaz Khan, HM B-17 GHS Khan Zaman Nurar Bannu	Principal B-18 GHS Gul Zaman Bannu	His promotion will be considered w.e.f. 20.1.2014 on Notional Basis

APPROVED
[Signature]

[Signature]
25/04/19

S#	Name of Officer with Designation	Proposed Place of Posting	Remarks.
6	Ihsanud Din , SDEO(M) Tank	Principal B-18 GHS Gomal Bazar Tank	His promotion will be considered w.e.f. 2.1.2014 on Notional Basis
7	Syed Shoukat Shah HM B-17 FATA		Services placed at the disposal of ACS FATA for further posting
8	Sultan Saeed , SS(Stat) GHSS No.1 Peshawar Cantt	V/P B-18 GHSS No.1 Peshawar Cantt	Against Vacant Post
9	Younas Ali Khan , SS(Physics) GHSS Serai Naurang Lakki	SS(Physics) B-18 GHSS Serai Naurang Lakki	Already occupied by him
10	Muhammad Farooq ,SS B-17 (Chemistry) GHSS Shah Salim Karak	SS(Chemistry) B-18 GHSS Warana Karak	Vice Serial No.355
11	Gul Farosh Khan,SS(Stat) GHSS Gadezai Buner	SS(Stat) B-18 GHSS Gadezai Buner	Already occupied by him
12	Sheraz Ahmed, SS(Chemistry) GHSS Thand Koi Swabi	SS(Chemistry) B-18 GHSS Thand Koi Swab	Already occupied by him
13	Muhammad Parsa , SS(Stat)GHSS Tajazai Lakki Marwat	SS(Stat) B-18 GHSS Tajazai Lakki Marwat	Already occupied by him
14	Muhammad Nawaz , SS(Eco:)GHSS Lora Abbottabad	SS(Eco:)GHSS B-18 Lora Abbottabad	Already occupied by him
15	Rayat Khan , SS(Physics) GHSS Bogara Karak	SS(Physics) B-18 GHSS Bogara Karak	Already occupied by him
16	Fakhri Alam , SS(Physics) GHSS Hazar Khawani peshawar	SS(Physics) B-18 GHSS Chamkani peshawar	Vice Serial No.356
17	Niaz Ahmad , SS(Stat) GCMHS No.1 Haripur	SS(Stat) B-18 GCMHS No.1 Haripur	Already occupied by him
18	Wilayat Khan, SS(Chemistry) GHSS Chamtar Mardan	SS(Chemistry) B-18 GHSS Gujar Garhi Mardan	Vice Serial No. 395
19	Ishtiaq Ahmad, SS(Chemistry) GHSS Khair Abad Nowshera	V/P B-18 GHSS Khair Abad Nowshera	Against Vacant Post

Accepted & ESTED

[Signature]
25/04/14

(25)

No TA/DA will be allowed to the oppiontees for joining their duty.

CHIEF SECRETARY

Endst: of even No. & Date

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Additional Accountant General Pakistan Revenue Sub Office, Peshawar.
3. PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
4. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
5. Director, Curriculum & Teacher Education, Abbottabad.
6. Director, Provincial Institute of Teacher Education, Peshawar.
7. Director, Education FATA, FATA Secretariat Warsak Road, Peshawar.
8. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
9. District Accounts Officers concerned.
10. District Education Officers concerned.
11. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
12. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
13. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
14. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
15. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
16. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
17. Incharge EMISE E&SE Department.
18. Notification can be downloaded from our website: www.kpese.gov.pk
19. Office order file.

MUJEEB-UR-REHMAN
MUJEEB-UR-REHMAN

MUJEEB-UR-REHMAN
 25/04/19
 (MUJEEB-UR-REHMAN)
 SECTION OFFICER (SCHOOLS/MALE)

MUJEEB-UR-REHMAN
 25/04/19

28/9/2014. last date of stipulated
period.

Annexure - F:

26

ADVANCED COPY/ THROUGH PROPER CHANNEL

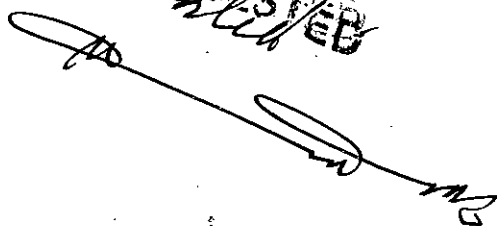
To

The Government of Khyber Pakhtunkhwa,
Through Chief Secretary Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.

Subject: REPRESENTATION/ DEPARTMENTAL APPEAL
AGAINST THE NOTIFICATION BEARING
NO.SO(S/M)E&SED/1-3/ 2013/PROMOTION BPS-17
TO BPS-18, ISSUED BY GOVT. OF KHYBER
PAKHTUNKHWA, ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT, WHEREBY 353 OFFICERS
OF TEACHING CADRE OF ELEMENTARY &
SECONDARY EDUCATION DEPARTMENT, PESHAWAR
UPGRADED FROM BPS-17 TO BPS-18 WITH
IMMEDIATE EFFECT ON REGULAR BASIS IN THE
LIGHT OF UPGRADATION OF 4 TIER FORMULA,
NOTIFIED THROUGH GOVERNMENT OF KHYBER
PAKHTUNKHWA FINANCE DEPARTMENT
NO.BOV/FD/2-112/2011/04-TIER FORMULA DATED
PESHAWAR THE 28TH FEBRUARY, 2012, FIRST PHASE
EFFECTIVE W.E.F. 01.07.2012.

Respected Sir,

I humbly submit as under:

ACCEPTED


1. That I joined the Education Department on 20.12.1976, having qualification of M.A, B.Ed.
2. That on 31.08.2000, I was promoted to the post of BPS-17 (Headmaster) and whereafter I was posted as Headmaster GHS, Palosi Maghdarzai, Peshawar.
3. That the Government of Khyber Pakhtunkhwa Finance Department, through notification No.BOV/F-D/2-112/2011/04-Tier Formula dated Peshawar the 28th February, 2012 upgraded total sanctioned strength of 5164 posts i.e. BPS-20, BPS-19, BPS-18 and BPS-17 (as on 30.09.2009) of the Teaching Cadre of Elementary & Secondary Education Department, on the basis of 4 Tier Formula carrying the ratio of 1:15:34:50 first phase effective from 01.07.2012 subject to the observance of all codal formalities. (Copy of the notification is annexed as annexure "A").
4. That the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar through memo bearing No.5287-91/A-12/Estt-1/4-Tier dated Peshawar the 31.03.2012, asked all the Principals, HMs/SSs (Male & Female) in BPS-17 and

ATTESTED
[Signature]

above, working in all the Districts of Khyber Pakhtunkhwa to provide the information as detail below:

- i. Bio DATA (length of service)
- ii. CNIC and SSC attested copy
- iii. Non-involvement certificate
- iv. Ten photographs passport size
- v. ACR (complete period of the present scale).

(Copy of the notification is annexed as annexure "B").

5. That I being Headmaster GHS, Palosi, Maghdarzai in pursuance of the said memo and having more than 11 years service on BPS-17 regular post, submitted the required/ requisite information well within time to the quarter concerned.
6. That I have been retired at the age of superannuation w.e.f. 01.11.2013 vide notification bearing No. 3938-4/5LPR dated 16-9-2013 (Copy of the notification is annexed as annexure "C").
7. That on 20.06.2014, when I visited the office of the Section Officer/ Legal Representative Elementary & Secondary Education Khyber Pakhtunkhwa, Civil Secretariat, Peshawar in connection with my

Attested
to

personal affair, I came to know about the notification bearing No.SO(S/M)E&SED/1-3/2013/Promotion BPS-17 to BPS-18, whereby 353 officers of the Teaching Cadre of Elementary & Secondary Education Department were promoted with immediate effect. (Copy of the notification is annexed as annexure "D").

8. That feeling aggrieved, and having no other adequate remedy, I request for the redressal of my grievance and upgradation/ promotion BPS-18 w.e.f. 01.07.2012 on the following grounds amongst others;

G R O U N D S:

- A. That the posts of BPS-18 were sanctioned and were available vacant w.e.f. 01.07.2012.
- B. That the requisite qualification and length of service for promotion to BPS-18 was 7 years whereas my length of service on BPS-17 was more than 11 years.
- C. That as per 4-Tier Formula, the post of BS-18 have not been create d, rather the same number of post of BPS-17 have been upgraded from BPS-17

Approved
[Signature]

to BPS-18 and I was eligible for upgradation w.e.f. 01.07.2012 at the time of notification bearing No.BOV/FD/2-112/2011/4-Tier Formula dated 28.02.2012 and thus the appellant/ applicant is entitled to be promoted w.e.f. 01.07.2012 as the post of the appellant/ applicant according to seniority was upgraded from BPS-17 to BPS-18.

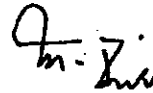
- D. That it is settled law that civil servant holding qualification and fulfilling other conditions prescribed for promotion to certain post would have right to be considered for promotion.
- E. That it is also settled law the action of Departmental Authority in withholding promotion of civil servant from the date of eligibility and occurrence of vacancy would be unlawful and violative of all norms of justice.
- F. That it is also settled law that where, notification, whereby monetary benefit is allowed to a civil servant from the date it legally accrued to him, is delayed or is not issued at the time of accrual of such benefit, same can be given with retrospective effect for the reason that the civil servant cannot be made to suffer for the delay made on the part of Departmental Authority.

M
A. K. S.
TESTED
M

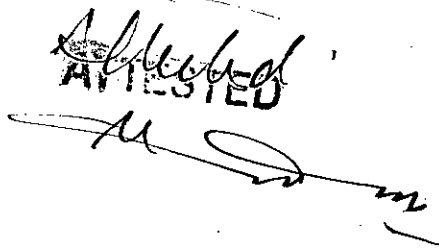
It is, therefore, humbly prayed that on acceptance of this representation/ departmental appeal/ review, I being eligible for the post of BPS-18 on 01.07.2012, may please be granted BPS-18 w.e.f. 01.07.2012, being the 1st phase of 4-Tier Formula, sanctioned and approved by the Government of Khyber Pakhtunkhwa vide No.BOV/FD/2-112/2011/04-Tier Formula dated 28.02.2012 with all back benefits.

Dated: 2/7/2014

Appellant

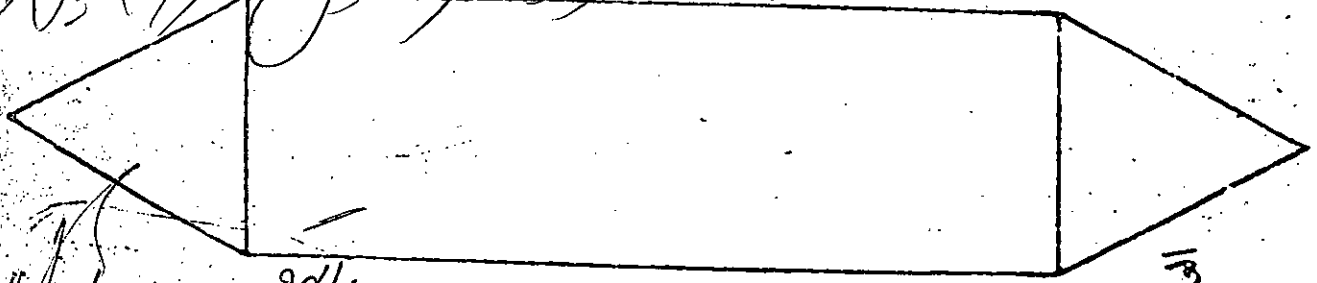


Muhammad Tahir
Ex-Headmaster,
GHS Palosi, Maghdarzai
R/o Canal Town, Nasir Bagh
Road Street No.7, Peshawar



ATTESTED

بعدالت صحتاً - سرور میں سرپرستوں کی طرف سے منظور شدہ



2014
مقام: منجانب سرپرستوں کی طرف سے
بنام صورت

محمد طاہر

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر انکم

مقدمہ مندرجہ مضمون بہلا میں اپنی طرف سے واسطے پیروی و جواب وہی دکل کاروائی متعلقہ آن مقام کے لئے گھنٹہ گھر کے لئے مقررہ کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا نیز دیکھیں صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برطلف دیے جواب وہی اور اقبال دعویٰ اور بصورت دگری کرنے اجراء اور وصولی چیک در پیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق نہ رہیں پر دستہ ذکر کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا دگری کیغرض یا اپیل کی برآمدگی اور موقوفی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور دیکھیں یا مختار قانونی کو اپنے ہمراہ یا اپنی جگہ تقررہ کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جلد مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پمداختہ منظورہ قبول ہوگا و دوران مقدمہ میں جو چیزیں درجہ اتوائے مقدمہ کے سبب سے ہوگا۔ اگلے کے مستحق دیکھیں صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ یہ ہو یا حد سے باہر ہو تو دیکھیں صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا ذکات نامہ لکھ دیا کہ سند رہے۔

27/10/2014

المترجم

Attested and accepted

محمد طاہر

(Signature)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 1285/2014.

Muhammad Tahir, Ex-H/M, GHS, Palosi, Maughdharzai Distt: Pesh:.....**Appellant**

VERSUS

Secretary E&SE, Deptt: Govt: of Khyber Pakhtunkhwa & others..... **Respondents**

Parawise comments for & on behalf of Respondents No. 1-3.

Respectfully Sheweth,

The Respondents submit as under:-

Preliminary Objections:-

1. The appellant has got no cause of action/ locus standi.
2. The instant appeal is badly time barred.
3. The appellant has concealed the material facts from this Hon 'able Tribunal, hence is liable to be dismissed on this score.
4. The appellant has not come to this Hon 'able Tribunal with clean hands.
5. The appellant has filed the instant appeal on malafide intentions just to pressurize the Respondents for illegal service benefits.
6. The present appeal is liable to be dismissed for mis-joinder & non joinder of necessary parties.
7. The instant appeal is against the prevailing law and rules.
8. The appellant is estopped by his own conduct to file the instant appeal.
9. The instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
10. That the impugned Notification dated 25-04-2014 is legally competent and is liable to be maintained in favour of the Respondents.
11. That the appellant is not entitled for the grant of the relief he has sought from this Hon'able Tribunal.
12. That this Hon'able Tribunal has got no jurisdiction to entertain the instant service appeal.
13. That the instant Appeal is barred by Law.
14. That the Appellant has got retired form official service vide Notification dated 14-02-2014 w.e.f 13-02-2013 against the said post. So he has no locus standi to file the Appeal.

FACTS.

1. Para-1 needs no comments being relates to the Service record of the appellant.
2. Para-2 is also needs no comments being pertains to the service record of the Appellant.
3. Para-3 is correct to the extent that the appellant has been placed at S.No. 178 of the mentioned seniority list as stood on 13-02-2013 prepared and maintained by the Respondent No. 3 whereas rest of the para pertains to the office record, hence needs no comments.

4. Para-4 is correct that the Finance Department, Govt: of Khyber Pakhstunkhwa vide Notification No. BOV/FD/2-112/2011/4-Tier Formula dated 28-10-2012 has been please to up-grade the total sanction posts of various Teaching Cadres in BS-17, 18, 19 & 20 (as on 30-09-2009) at ratio of 01:15:34:50: under the 4-tier formula subject to the observance of all codal formalities.

However, it is further submitted that the Appellant could not be promoted against the BS-18 headmaster post in the light of the above referred formula on the grounds that he has got retired from his official service vide Notification dated 14-02-2014 w.e.f 13-02-2013, hence he has been draft/rejected for the grant of promotion in BS-18 vide the impugned Notification dated 25-04-2014 issued by the Respondent No. 2 in the interest of public service and with immediate effect. (Copies of the cited notifications ~~is~~ attached as Annex-A).

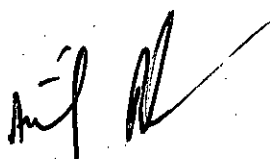
5. Para-5 is correct, that the Respondent No. 3 has sought the mentioned documents for the purpose of preparation of working papers and onward placing of the same before the PSB, Meeting.
6. Para-6 is incorrect & mis-leading on the grounds that the Appellant has got retired from his official service on 14-02-2014 w.e.f 13-02-2013 whereas the dates of PSB meeting and impugned Notification are much later than the date of the retirement of the Appellant, hence he has not been considered for the grant of promotion in BS-18 against the H/M post in the Respondent Department.
7. Para-7 is correct to the extent that the appellant has got retired from his official service at the age of superannuation, hence he has not been considered for the grant of promotion in BS-18 in the Respondent Department.
8. Para-8 is correct to the extent that the Respondent No. 2 has been please to issue the impugned Notification dated 25-04-2014 in favour of 353 officials of Teaching Cadres from BS-17 to BS-18 under the 4-tier formula wherein the Appellant could not be included on the grounds as mentioned in the foregoing paras.
9. Para-9 is incorrect and denied no Department Appeal has been filed by the Appellant, neither any such record what so ever is available in the office of the replying Respondent till date. However, the Respondent further submit on the following grounds inter-alia.

GROUND.

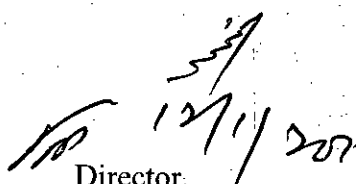
- A. Incorrect and denied: The appellant has got retired from his official service on the dated as mentioned above, whereas the Respondent No. 2 has been pleased to grant promotion to 253 eligible officials of Teaching Cadre vide Notification dated 25-04-2014 in the light of the recommendations of the PSB, hence the said is liable to be maintained in favour of the Respondents.

- B. Incorrect and denied, detailed reply has been given in the above paras of the instant reply, hence no comments.
- C. Incorrect and denied. The Appellant has got retired from his service prior to the PSB meeting and issuance of the impugned Notification dated 25-04-2014. Therefore, he has been rejected for the grant of promotion in BS-18 in the light of the above made submissions.
- D. Incorrect and denied. The statement of the Appellant is mis-leading as there were 353 vacant posts as mentioned in the impugned Notification dated 25-04-2014, hence the plea of the Appellant is liable to be dismissed.
- E. Incorrect and denied, Detailed reply has been given above, hence no further comments.
- F. Incorrect and denied, Detailed reply has been given above, hence no further comments.
- G. Incorrect and denied, The Appellant has been found ineligible for the grant of promotion in BS-18 on the grounds of his retirement prior to the PSB meeting and issuance of the impugned Notification of the Respondent No. 2, hence the statement of the Appellant in this ground is also deserves to be struck down in favour of the Respondents.
- H. Legal, however, the Respondents seek leave this Hon'able Tribunal to advance addl: grounds/record at the time of arguments on main appeal.

In view of the above made submissions, it is, therefore, most humbly requested that this Honourable Tribunal may very graciously be pleased to dismiss the appeal in hand with cost in favour of the Respondents.


Secretary
Elementary & Secondary Education,
Department

(Respondent No. 1 & 2)


Director,
Elementary & Secondary Education,
Department.

(Respondent No. 3)

Ammeru-AB

19

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the April 25, 2014

NOTIFICATION

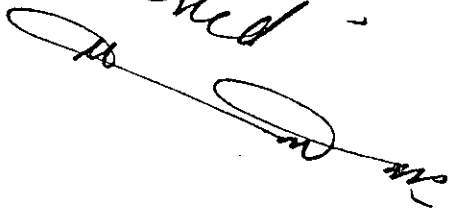
NO.SO(S/M) E&SED/1-3/2013/Promotion BS-17 to BS-18: The Competent Authority on the recommendations of the Provincial Selection Board is pleased to promote/appoint the following (353) Officers of Teaching Cadre of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect as under except Sr. No. 67 & 99.

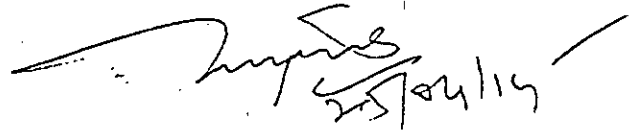
Sr.#	Name	Sr.#	Name	Sr.#	Name
1	Mr. Umar Muhammad	2	Mr. Mubarak Shah	3	Mr. Saeed-ur-Rahman
4	Mr. Muhammad Zaman	5	Mr. Umar Nawaz Khan	6	Mr. Ihsan-ud-Din
7	Syed Shoukat Shah	8	Mr. Sultan Syed	9	Mr. Younas Ali
10	Mr. Muhammad Farooq	11	Mr. Gul Farooq Khan	12	Mr. Sheraz Ahmad
13	Mr. Muhammad Parsa	14	Mr. Muhammad Nawaz	15	Mr. Rayat Khan
16	Mr. Fakhri Alam.	17	Mr. Niaz Ahmad.	18	Mr. Wilayat Khan
19	Mr. Ishtiaq Ahmad	20	Mr. Mansoor Ahmad	21	Mr. Muhammad Shoaib Khan
22	Mr. Naveed Ahmad	23	Mr. Abdul Qadir	24	Mr. Khalid Mahmood
25	Mr. Abid Ullah Shah	26	Mr. Gul Hussain Shah	27	Mr. Muhammad Rahman
28	Mr. Farzand Ali Shah	29	Mr. Inayat-ur-Rehman	30	Mr. Muhammad Mehdi Shah
31	Mr. Zia Ullah	32	Mr. Muhammad Tariq Bhatti.	33	Mr. Sultan Muhammad
34	Mr. Hakim Ullah	35	Mr. Fida Muhammad	36	Mr. Arif Iqbal
37	Muhammad Zaheer	38	Mr. Mumtaz Saddiqi	39	Mr. Muhammad Sajjad
40	Mr. Muhammad Tahir	41	Mr. Abdul Nasir Khan	42	Mr. Muhammad Abid Jan
43	Mr. Zahid Amin	44	Mr. Fida Muhammad	45	Mr. Wasi Ullah
46	Mr. Hamd Ullah Jan	47	Mr. Azhar Hussain Shah.	48	Mr. Muhammad Arif.
49	Mr. Ihsan Ahmad	50	Mr. Muhammad Yousaf	51	Mr. Gul Nawaz Khan
52	Mr. Nigar Ahmad	53	Mr. Basharat Khan	54	Basharat Ahmad
55	Mr. Tahir Zaman	56	Mr. Arshad Mehmood	57	Mr. Muhammad Khalil
58	Mr. Sadar Shaheed	59	Mr. Eid Ullah	60	Mr. Rabib Khan.

Attended

Signature
25/04/14

Sr.#	Name	Sr.#	Name	Sr.#	Name
61	Mr. Rahat Ullah	62	Syed Mohsin Shah	63	Mr. Iqbal Ahmad
64	Mr. Ajmal Ahmad	65	Mr. Muhammad Luqman.	66	Mr. Amir Attique Saddique
67	Mr. Muhammad Idrees	68	Mr. Muhammad Sohail	69	Mr. Younas Ali Shah
70	Mr. Amir Muhammad Khan	71	Mr. Sohail Manzoor	72	Mr. Dost Muhammad
73	Mr. Muhammad Salim	74	Mr. Shah Jehan Afridi	75	Mr. Masud
76	Mr. Muhammad Ayaz	77	Mr. Kamin Khan	78	Mr. Mukhtar Gul
79	Mr. Hizb-ur-Rehman	80	Mr. Akbar Ullah	81	Mr. Rahmat Ullah
82	Mr. Iftikhar Ali	83	Farid Ullah	84	Mr. Amrullah
85	Mr. Muhammad Nawaz	86	Mr. Muhammad Hanifa	87	Mr. Sher Daraz Khan
88	Mr. Shakir-ur-Rehman	89	Mr. Faqir Muhammad	90	Mr. Pir Zahir Shah
91	Mr. Muhammad Sajjad	92	Mr. Muhammad Bashir Khan	93	Mr. Fateh Ullah Khan
94	Mr. Ashraf Ali	95	Mr. Shafiq un Nabi	96	Mr. Nasir Mahmood
97	Mr. Amir Muhammad	98	Mr. Zulfiqar Ahmad	99	Mr. Momin Khan
100	Mr. Abid Ali	101	Mr. Shahab Uddin	102	Mr. Jameel Ahmad
103	Mr. Niaz Ali Khan	104	Mr. Ihsan ul Jah	105	Mr. Shaffi Gul
106	Mr. Nasir Muhammad	107	Mr. Inayat Ullah	108	Mr. Said Bad Shah
109	Mr. Riaz Gul	110	Mr. Shabir Ahmad	111	Mr. Muhammad Tahir Rahim
112	Mr. Sharif Ullah Khan	113	Mr. Naseer Muhammad	114	Mr. Lais Khan
115	Mr. Muhammad Shehzad	116	Mr. Muhammad Salim	117	Mr. Nasir Ahmad
118	Mr. Shoukat Ali	119	Mr. Ejaz Ahmad	120	Mr. Inayat ur Rehman
121	Mr. Muhammad Tufail	122	Mr. Sudheer Khan	123	Mr. Muhammad Amin
124	Mr. Zari Aman	125	Mr. Muhammad Zahir Shah	126	Mr. Said Akbar
127	Mr. Muhammad Israr Khan	128	Mr. Iqbal Hussain	129	Mr. Iftikhar Ahmad
130	Mr. Altaf Hussain	131	Mr. Dost Ali Khan	132	Mr. Zia ul Hasnain
133	Mr. Mehmood ur Rehman	134	Mr. Feroz Ahmad	135	Mr. Rahim Ullah
136	Mr. Sikandar Khan	137	Mr. Umer Hayat	138	Mr. Rehmat Ullah
139	Mr. Ghulam Rasool	140	Mr. Gul Chaman	141	Mr. Iqbal Said
142	Mr. Inayat Ullah	143	Mr. Zahoor Ullah	144	Mr. Khan Badshah
145	Mr. Qayyum Nawaz	146	Mr. Samandar Khan	147	Mr. Badruz Zaman
148	Mr. Muhammad Bukhar	149	Mr. Said Zarin	150	Mr. Mumtaz Khan

Attended -



 25/04/19

Sr.#	Name	Sr.#	Name	Sr.#	Name
151	Mr. Hamid Hussain	152	Mr. Taseer Jan	153	Mr. Muzammil Shah
154	Mr. Latif ur Rehman	155	Mr. Akbar Jan	156	Mr. Muhammad Humayun
157	Mr. Fazalur Rehman	158	Mr. Younas Ali	159	Mr. Badish Khan
160	Mr. Mir Alam Khan	161	Mr. Feroz Khan	162	Mr. Rab Nawaz
163	Mr. Jalaludin	164	Mr. Safdar Ali	165	Mr. Rooh Ullah
166	Mr. Wasiq Saeed	167	Mr. Muhammad Riaz	168	Mr. Muhammad Saleem
169	Mr. Muhammad Daud Shah.	170	Mr. Abdullah Jan	171	Mr. Islam Khan
172	Mr. Gulzar Ali	173	Mr. Ikram Ullah	174	Mr. Sawar Jan
175	Mr. Gul Roshan Din	176	Mr. Fazal Shah	177	Mr. Muhammad Pervez
178	Mr. Abdul Hameed	179	Mr. Muhammad Rehman	180	Mr. Umer Jan
181	Mr. Habibur Rehman	182	Mr. Iqbal Muhammad	183	Mr. Shahid Hayat
184	Mr. Muhammad Rauf	185	Mr. Saif Ullah	186	Mr. Ajmal Khan
187	Mr. Juma Gul Shah	188	Mr. Shaukat Ali	189	Mr. Muhammad Sadat Khan
190	Mr. Feroz Shah	191	Mr. Gul Zaman	192	Mr. Shujat Ali Khan
193	Mr. Falak Naz	194	S. Hidayat Ali Shah	195	Mr. Gul Baz Khan
196	Mr. Farid Ullah Khan	197	Mr. Muhammad Aziz Ullah	198	Mr. Najeeb Ullah
199	Mr. Muhammad Younis Khan	200	Mr. Sarfaraz Khan	201	Mr. Raham Zada
202	Mr. Kaleem Ullah	203	Mr. Noor Khan	204	Mr. Shairoz Khan
205	Mr. Muhammad Iqbal	206	Mr. Ghafoor-ur-Rehman	207	Mr. Zahid Ullah
208	Mr. Haroon Rashid	209	Mr. Anwar Jan	210	Mr. Muhammad Zia
211	Mr. Muhammad Ashraf	212	Mr. Sana Ullah	213	Mr. Hamid Ullah
214	Mr. Muhammad Rashad	215	Mr. Gulzar Khan	216	Mr. Nisar Muhammad
217	Mr. Abdul Samad	218	Mr. Kaleem Ullah	219	Mr. Altaf Hussain Shah
220	Mr. Muhammad Saleem	221	Mr. Saifullah	222	Mr. Aqal Mond
223	Mr. Jehanzeb	224	Mr. Hameed Ullah	225	Mr. Riaz Ali
226	Mr. Zahid Ullah Shah	227	Mr. Shah Imtiaz	228	Mr. Ayub Khan
229	Mr. Muhammad Kamal	230	Mr. Faizullah	231	Mr. Aleem Shah
232	Mr. Bashir Ahmad	233	Mr. Zair Gul	234	Mr. Pinda Khan
235	Mr. Ishaq Hussain	236	Mr. Muhammad Yousaf	237	Mr. Farid Ullah Khan
238	Mr. Fazle Subhan	239	Mr. Aminul Haq	240	Mr. Ajmir Khan

Attended

25/04/14

Sr.#	Name	Sr.#	Name	Sr.#	Name
241	Mr. Gul Diat Khan	242	Mr. Sher Afzullah	243	Mr. Rahim Zada
244	Mr. Ibrar Ahmad	245	Mr. Noorul Basar	246	Mr. Ahmad Sultan
247	Mr. Muhammad Shafiq	248	Mr. Ali Gohar	249	Mr. Khizar Hayat
250	Mr. Qaiser Abbas	251	Mr. Mir Qalam Khan	252	Mr. Amanullah
253	Mr. Sharif Ullh	254	Muhammad Arif Khattak	255	Mr. Islam Ali
256	Mr. Muhammad Anis	257	Mr. Muhammad Tariq	258	Mr. Hasnain Ali
259	Mr. Gul Muhammad	260	Mr. Abdul Monim	261	Mr. Aqal Gul
262	Mr. Gul Zahir Shah	263	Mr. Gohar Khan	264	Mr. Izhar Ali
265	Mr. Muhammad Ramzan	266	Mr. Ghulam Rasool	267	Mr. Muhammad Pervez
268	Mr. Raza Muhammad	269	Mr. Sher Nawaz	270	Mr. Fazal Qayyum
271	Mr. Zafa ullah Khan	272	Mr. Sahib Zada	273	Mr. Atlas Noor
274	Mr. Ghulam Daud	275	Mr. Nasir Khan	276	Mr. Zakir Mehmood
277	Mr. Shahid Khan	278	Mr. Muhammad Imtiaz	279	Mr. Abdul Qayyum
280	Mr. Attaur Rehman	281	Mr. Abdur Rehman	282	Mr. Javed Khan
283	Mr. Sher Ali Salam	284	Mr. Muhammad Yaseen	285	Mr. Muhammad Latif
286	Mr. Javed Ali Khan	287	Mr. Muhammad Ayaz	288	Mr. Tajamul Hussain
289	Mr. Alam Zeb	290	Mr. Abdul Haleem	291	Mr. Saif-ur-Rehman
292	Mr. Muhammad Saleem	293	Mr. Taj Nabi	294	Mr. Ghulam Akbar
295	Mr. Sabz Aji	296	Mr. Dilawar Khan	297	Mr. Farooq Ahmad
298	Mr. Muhammad Raziq	299	Mr. Shabir Hussain Shah	300	Mr. Sami Ullah Khan
301	Mr. Imal Khan	302	Mr. Muhammad Shaiq	303	Mr. Muhammad Sadique
304	Mr. Muhammad Atif Hussain	305	Mr. Zee Gohar Saeed	306	Mr. Riaz Ahmad
307	Mr. Muhammad Sadique	308	Mr. Muhammad Shoaib	309	Mr. Mushtaq Ahmad
310	Mr. Ghulam Sarwar	311	Mr. Muhammad Saleem	312	Mr. Jehangir Khan
313	Mr. Muhammad Zafar Pervez	314	Mr. Khalil-ur-Rehman	315	Mr. Attiq-ur-Rehman
316	Mr. Lais Muhammad	317	Mr. Aman Ullah	318	Mr. Abdul Qayyum
319	Mr. Shah Zarin	320	Mr. Zahid Zaman	321	Mr. Khurshid Khan
322	Mr. Asmat Ullah	323	Mr. Malik Khan	324	Mr. Abdul Majid
325	Mr. Aziz ulhaq	326	Mr. Muhammad Waheed	327	Mr. Safdar Khan
328	Mr. Shabir Ahmad	329	Qazi Muhammad Amir	330	Mr. Bahadur Zaman
331	Mr. Ihsan ud Din	332	Mr. Hafeez Ullah Khan	333	Mr. Awalyaz

Atif Hussain
Atif Hussain

Muhammad Atif Hussain
 25/04/19

Sr.#	Name	Sr.#	Name	Sr.#	Name
334	Mr. Muhammad Shoaib	335	Mr. Saif Ullah	336	Mr. Fida Muhammad
337	Mr. Hameed Khan	338	Mr. Muhammad Aurangzeb	339	Mr. Abdul Latif
340	Mr. Muhammad Inam	341	Mr. Muhammad Iqbal	342	Mr. Mislahuddin
343	Mr. Abdul Khaliq	344	Mr. Gul Muhammad	345	Mr. Hazrat Hussain
346	Mr. Shafi ul Haq	347	Mr. Muhammad Sher Khan	348	Mr. Khalid Khan
349	Mr. Shaida Muhammad	350	Mr. Fazal Wali	351	Mr. Haq Nawaz
352	Mr. Ismat Ullah	353	Mr. Hameed Ullah.		

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servent Act, 1973 read with rule-15(1) of the Khyber Pahtunkhwa Civil Servent (Appointment, Promotion & Transfer) rules, 1989 the above male officers of the Teaching Cadre on their promotion shall be on probation for a period of one year.

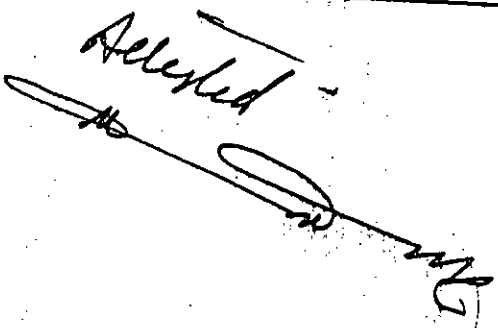
3. Consequent upon the above, the following postings/transfers are hereby ordered henceforth.

PROMOTION FROM B-17 TO B-18 MALE			
Sr.#	Name of Officer with Designation	Proposed Place of Posting	Remarks
1	Umar Muhammad , SS(PS),GHSS Khawaza Khela Swat.	Principal B-18 GHSS Qamber Swat.	Vice Muhammad Amin Promoted to B-18
2	Mubarak Shah, SS(Chemistry) GHSS No, 4 Mardan	SS (Chemistry) BS-18 No. 4 Mardan	Already occupied by him
3	Saeed Ur Rehman SS (Stat) GHSS Urmay Payan Peshawar	SS (Stat) B-18 GHSS No.1 Peshawar Cantt	Against Vacant Post
4	Muhammad Zaman , HM B-17 GHS Ranai Dir Lower	Principal B-18 GHS Tore Mang Dir Lower	Against Vacant Post
5	Umar Nawaz Khan, HM B-17 GHS Khan Zaman Nurar Bannu	Principal B-18 GHS Gul Zaman Bannu	His promotion will be considered w.e.f. 20.1.2014 on Notional Basis

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25/04/14

S#	Name of Officer with Designation	Proposed Place of Posting	Remarks.
6	Ihsanud Din , SDEO(M) Tank	Principal B-18 GHS Gomal Bazar Tank	His promotion will be considered w.e.f. 2.1.2014 on Notional Basis
7	Syed Shoukat Shah HM B-17 FATA		Services placed at the disposal of ACS FATA for further posting
8	Sultan Saeed , SS(Stat) GHSS No.1 Peshawar Cantt	V/P B-18 GHSS No.1 Peshawar Cantt	Against Vacant Post
9	Younas Ali Khan , SS(Physics) GHSS Serai Naurang Lakki	SS(Physics) B-18 GHSS Serai Naurang Lakki	Already occupied by him
10	Muhammad Farooq ,SS B-17 (Chemistry) GHSS Shah Salim Karak	SS(Chemistry) B-18 GHSS Warana Karak	Vice Serial No.355
11	Gul Farosh Khan,SS(Stat) GHSS Gadezai Buner	SS(Stat) B-18 GHSS Gadezai Buner	Already occupied by him
12	Sheraz Ahmed, SS(Chemistry) GHSS Thand Koi Swabi	SS(Chemistry) B-18 GHSS Thand Koi Swab	Already occupied by him
13	Muhammad Parsa , SS(Stat)GHSS Tajazai Lakki Marwat	SS(Stat) B-18 GHSS Tajazai Lakki Marwat	Already occupied by him
14	Muhammad Nawaz , SS(Eco:)GHSS Lora Abbottabad	SS(Eco:)GHSS B-18 Lora Abbottabad	Already occupied by him
15	Rayat Khan , SS(Physics) GHSS Bogara Karak	SS(Physics) B-18 GHSS Bogara Karak	Already occupied by him
16	Fakhri Alam , SS(Physics) GHSS Hazar Khawani peshawar	SS(Physics) B-18 GHSS Chamkani peshawar	Vice Serial No.356
17	Niaz Ahmad , SS(Stat) GCMHS No.1 Haripur	SS(Stat) B-18 GCMHS No.1 Haripur	Already occupied by him
18	Wilayat Khan, SS(Chemistry) GHSS Chamtar Mardan	SS(Chemistry) B-18 GHSS Gujar Garhi Mardan	Vice Serial No. 395
19	Ishtiaq Ahmad, SS(Chemistry) GHSS Khair Abad Nowshera	V/P B-18 GHSS Khair Abad Nowshera	Against Vacant Post

Accepted -



 25/04/14

85

4. No TA/DA will be allowed to the oppointees for joining their duty.

CHIEF SECRETARY

Endst: of even No. & Date

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Additional Accountant General Pakistan Revenue Sub Office, Peshawar.
3. PSO to Chief Minister Khyber Pakhtunkhwa, Peshawar.
4. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
5. Director, Curriculum & Teacher Education, Abbottabad.
6. Director, Provincial Institute of Teacher Education, Peshawar.
7. Director, Education FATA, FATA Secretariat Warsak Road, Peshawar.
8. Manager Printing Press Khyber Pakhtunkhwa, Peshawar.
9. District Accounts Officers concerned.
10. District Education Officers concerned.
11. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
12. PS to Additional Chief Secretary FATA, FATA Secretariat Warsak Road, Peshawar.
13. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
14. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
15. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
16. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
17. Incharge EMISE E&SE Department.
18. Notification can be downloaded from our website: www.kpese.gov.pk
19. Office order file.

Assisted

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25/04/14

(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

[Handwritten signature]
25/04/14

Before the service tribunal KPK
Peshawar

Muhammed Tahir vs Court.

Application for permission
to deposit the security
fee

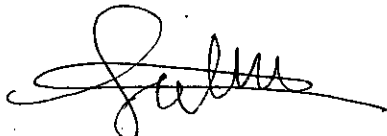
Respectfully sheweth:

- 1- That the above titled service appeal was admitted on 28-7-015 and is fixed for 26-10-015.
- 2- That the petitioner/appellant due to domestic problems was unable to deposit the security fee.

Adm
27-08-15

It is, therefore, humbly prayed that the petitioner/appellant may kindly be allowed to deposit the security fee.

Dated: 26 $\frac{8}{015}$

Muhammed Tahir
Through counsel


BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR

In Re:

Service Appeal No. 1285/ 2014

Muhammad Tahir.....Appellant

V E R S U S

Secretary E&SE and others.....Respondents

**Rejoinder to the comments submitted
by respondents No. 1 to 3.**

Respectfully Sheweth:

All preliminarily objections raised by respondents No. 1 to 3, are vexatious, irrelevant, without footing and not supported by a single piece of evidence, hence are liable to be discarded.

1. The appellant has a cause of action/locus standi.
2. The appeal of the appellant is well within time. Preliminary objection is irrelevant and without footing.
3. All the material facts have been mentioned in the appeal. The respondents have not shown any thing contrary to the appeal in the shape documentary evidence.
4. That the appellant come to the court with clean hands, the objection of respondents is without any proof.
5. That the respondents have not shown any malafide, hence the objection is irrelevant.

6. That all the necessary parties have been arrayed by appellant and there is no mis-joinder and non-joinder of necessary parties.
7. That appeal of the appellant is within the preview of law and rules.
8. That the objection raised by the respondents is false as no proof of estoppel is attached with the comments.
9. That the appeal of the appellant is maintainable in its present form and circumstances of the issue.
10. That the impugned notification dated 25/04/2014 is illegal to the extent of appellant as the post of BPS-18 were upgraded on 01/07/2012 and appellant was eligible to be promoted to BPS-18 with effect from 01/07/2012.
11. That the appellant is entitled for the grant of relief claimed in the appeal.
12. That the Hon'ble Tribunal has got the jurisdiction to entertained appeal of the appellant.
13. That the objection of the respondents irrelevant. The appeal of the appellant is not barred by any law.
14. That though the appellant has got retired from service on 31/10/2013 but the post of BPS-18 against which the appellant was working, was available with effect from 01/07/2012 and therefore the appellant is entitled to be promoted from 01/07/2012.

ON FACTS:

1. Paras No 1-2 of the comments need no rejoinder as Paras of the appeal have not been objected.

3. Para No. 3 the appeal is correct in toto whereas partial rejection of the para by the respondents is incorrect.
4. Paras No. 4 of the appeal is correct and the respondents have also admitted the notification bearing No. BOV/FD/2-112/2011/4-TIER formula dated 28/02/2012. The respondents misstated by showing the appellant retired from service w.e.f 13/02/2013. Actually, the appellant got retired from serve w.e.f. 31/10/2013, besides, the respondents have discriminated the appellant as some of the officers mentioned in the notification dated 25/04/2014 have been promoted to BPS-18 despite the fact that they were retired prior to the impugned notification (Annexure-E of the appeal).
5. Para No. 5 needs no reply/rejoinder being admitted correct.
6. Para No. 6 of the comments is based on misstatement, hence denied whereas para of the appeal is correct.
7. Para 7 of the comments is incorrect, wrongly drafted whereas para of the appeal is correct.
8. Para 8 of the comments admits the facts that 353 official of teaching cadre were promoted from BPS-17 to BPS-18 under the four TIER formula but the appellant could not be included on the sole ground of his retirement on 31/10/2013, so the comments of respondents on the one hand admits that the post under 4-TIER formula upgraded w.e.f 01/07/2012 but the appellant was dropped due to his retirement on 31/10/2013. The appellant is entitled to BPS-18 w.e.f from 01/07/2012.
9. Para 9 of the comments is incorrect, wrongly been drafted whereas para of the appeal is correct.

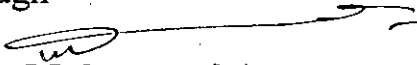
GROUND

- A. Grounds A and B of the comments are incorrect, hence denied, whereas ground of the appeal are correct.
- C. Ground C of the comments has wrongly been drafted, hence denied, whereas ground of the appeal is correct and the appellant is entitled to the post of BPS-18 w.e.f 01/07/2012 as per notification issued under the 4-TIER formula on 28/02/2012.
- D. Ground D of the comments is incorrect, hence denied, whereas ground of the appeal is correct, the respondents have wrongly mentioned in their comments that there were 353 vacant post as mentioned in the impugned notification dated 25/04/2014 whereas the factual position is that the post of 374 BPS-17 were upgraded w.e.f 01/07/2012 and the appellant was working against one of the post of BPS-18 w.e.f 01/07/2012.
- E. Grounds E and F of the comments are incorrect, hence denied, whereas grounds of the appeal are correct.
- G. Ground G of the comments is incorrect, whereas ground of the appeal is correct. The respondents have ignored the appellant from promoting to BPS-18 on the ground of his retirement. The appellant was in service w.e.f 01/07/2012 and was working against the post of BPS-18 till his retirement on 31/10/2013, hence the appellant is entitled to all the benefits of BPS-18 w.e.f 01/07/2012.
- H. In response to Ground H it is submitted that the appellant with leave of the Hon'ble Tribunal will advance additional grounds at the time of final hearing of the case.

It is, therefore, most humbly prayed that the appeal of the appellant may please be allowed and the appellant may please be granted BPS-18 w.e.f 01/07/2012 with all back benefits, being the 1st Phase of 4-TIER formula sanctioned and approved by government of KPK vide notification No. DOV/FD/2-112/2011/04-TIER formula dated 28/02/2012.

Appellant

Through


Muhammad Anwar
Advocate High Court,
Peshawar

Date: 31/12/2016

AFFIDAVIT

As per instruction of my client

I do hereby solemnly affirm and declare on oath that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief.


DEPONENT

12-2-16
Commissioner
F/ Muhammad Khattak (ASC)
License No. 961/14-4-2014
Peshawar High Court Peshawar
CNIC: 17301-7401834-5