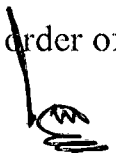


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1473/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2022	<p>The appeal of Mr. Alim Khan presented today by Mr. Abdur Rehman Mohmond Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 17-10-22 notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR <i>av</i></p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

S.A.No. 1473/2022.

ALIM KHAN SST GENERAL ----- APPELLANT.

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS.

.....RESPONDENTS /

INDEX

S.No	Description of Documents	Annex	Pages
A.	SERVICE APPEAL		
1.	Copy of CNIC	A	8
2.	Copy of credentials/ degree	A-1 to A-4	9-12
3.	Copy of appointment letter Endst:No.223669-97dated 17.10.1978.	B	13
4.	Copy of the Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre Dated 24 TH July, 2014.	C	14-18
5.	Copy of the letter No.4954 dated 07.08.2014 of Respondent No.2 department.	D	19
6.	Copy of the said Notification Endst No. 3493-3562 dated 31.10.2014.	E	20-23
7.	Copy of letter No.2602-3 dated 09.03.2015 of the Respondent No.3.	F	24
8.	Copy of promotion order/letter Endst: No.16101-50 dated 11.10.2017 of Respondent No.3 is annexure "G"	G	25-30
9.	Copy of adjustment order Endst. No.1190-12321 Edu dated 18.10.2017.	H	31-32
10.	Copy of Notification Peshawar, dated the November 13, 2012.	I	33-36
11.	Copy of the up gradation Endst: No.4041-4090/File No.1/Promotion Senior CT B-16 dated 28.02.2017.	J	37-39
12.	Copy of adjustment letter No.719-24/Edu dated 15.03.2017.	K	40-41
13.	Copy of Departmental Appeal dated 19.03.2018.	L	42-43
14.	Copy of Reminder application dated 18.04.2018.	M	44-
15.	Copy of the Judgment dated 14.07.2021 of this Hon'able Tribunal in appeal No. 1266/2018 and connected appeals.	N	45-53
16.	WAKALATNAMA		54

Aj Bhai
Appellant
Rahman

Through

Abdur Rahman Mohmand Advocate. **CELL:03005991598**

Mohmand Law Chamber Charsadda Road Near Faqirabad Police Station

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

S.A.No. 1473/2022.

ALIM KHAN S/O FAIZ ULLAH KHAN SST GENERAL (BPS-16) P.O. PARA CHINAR ZERRAN MULA BAGH TEHSIL UPPER KURRAM DISTRICT KURRAM.

----- **APPELLANT.**

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY AND SECONDARY EDUCATION SECRETARIATE BUILDING PESHAWAR.
2. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.
3. THE DIRECTOR EDUCATION NEWLY MERGED DISTRICTS WARSAK ROAD, PESHAWAR.

.....**RESPONDENTS.**

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST ORDER DATED 11.10.2017 OF RESPONDENT NO.3 FOR NON OBSERVANCE OF PROMOTION/SENIORITY ORDER OF THE APPELLANT FROM THE DATE OF NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 FOR PROMOTION OF SCT/CT TO SST (Phy-Maths) BPS-16, PASSED BY THE GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION BASED ON DISCRIMINATION, VIOLATION OF FUNDAMENTAL RIGHT AND AGAINST KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER RULES, 1989).

.....
RESPECTFULLY SHEWETH!

1. That the Appellant is a naturally born law abiding citizen of the Islamic Republic of Pakistan and is qualified up to master of Science and Master of Education (M.ED). (Copies of CNIC is annexure "A" and credentials/ degree is annexure "A-1 to A-4").
2. That the Appellant was appointed as Certified Teacher (CT) on dated 19.09.1998 through Endst:No.1855-91 by the Respondents department and has performed his duties on different locations

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with honesty and full devotion and has been a responsible, hard worker, skillful, dutiful, punctual and obedient teacher and presently the Appellant has promoted to the post of Secondary School Teacher (SST BPS-16) and is posted at GISHS District Kurram at Parachinar. (Copy of appointment letter Endst:No.1855-91 dated 19.09.1998 is Annexure "B").

3. That the Respondent No.1 i.e Government of Khyber Pakhtunkhwa Elementary and Secondary Education through NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 had issued criteria for promotion of teachers to next grades, which was equally applicable to provincial as well as employees working in Ex-FATA. (Copy of the Notification No.SO(PE)/4-5/SSRC/Meeting/2013/ Teaching Cadre Dated 24TH July, 2014 is annexure "C").
4. That the Respondent No.2, Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through letter No.4954 dated 07.08.2014 and letter No.4874 dated 06.08.2014 requested Respondent No.3 to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules. (Copy of the letter No.4954 dated 07.08.2014 of Respondent No.2 department is annexure "D").
5. That after requesting again and again by the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through different letters Respondent No.3 delayed the process and did not consider the Appellant from his due date of promotion.
6. That following the above mentioned same Notification, the District Education Officer Male Hangu through Endst No.3493-3562 dated 31.10.2014 promoted 49 SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs, to the post of SST (Bio-Chem), SST (Phy-Maths), SST(General) BPS-16. (Copy of the said Notification Endst No. 3493-3562 dated 31.10.2014 is annexure "E").
7. That after quit length of time, through letter Endst. No.2602-3 dated 09.03.2015, the Respondent No.3, wrote a letter to all the then Agency Education Officers ex-FATA to prepare category wise list (Male/Female) as per given proforma along with photo copies of the documents of the candidates for promotion against the post of SST. (Copy of letter No.2602-3 dated 09.03.2015 of the Respondent No.3 is annexure "F").
8. That the Respondent No.3 has not observed the appellant promotion from his due date i.e 24th July,2014 according to Notification but delay the process and lastly have passed his promotion ordered through letter Endst: No.16101-50 dated 11.10.2017 after a long time, hence appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.(Copy of promotion order/letter Endst No.16101-50 dated 11.10.2017 of Respondent No.3 is annexure "G" while adjustment order Endst. No.1190-12321 Edu dated 18.10.2017 is annexure "H")

3

9. That this order of Respondent No.3 has affected the Seniority/promotion of the Appellant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and EX-FATA(Merged District) are the same and not considering the appellant from the due date adversely affect the appellant right for seniority in Subject Specialist (SS) posts in Higher Secondary School as well as Headmasters in High Schools which is clear violation of fundamental rights of Appellant and against Notification Peshawar, dated the November 13, 2012. (Copy of Notification Peshawar, dated the November 13, 2012 is annexure "I").
10. That the appellant time and again visited/requested the respondents to follow the said rules but all in vain. It is pertinent to mention here that the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department through Notification Endst. No.4041-4090/File No.1/Promotion Senior CT B-16 dated 28.02.2017 passed up gradation order of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department and the same order was applied upon appellant, hence on dated 28.02.2017 the appellant was upgraded to Sr.CT with effect from 20.02.2013. (Copy of the up gradation Endst: No.4041-4090/File No.1/Promotion Senior CT B-16 dated 28.02.2017 is annexure "J")
11. That even after promotion of other colleagues of appellant, the Respondent No.3 has not observed the appellant promotion from his due date i.e 24th July,2014 according to Notification but delay the matter and lastly has ordered the promotion of the Appellant through letter Endst: No.16101-50 dated 11.10.2017 after a long time and adjustment letter No.719-24/Edu dated 15.03.2017 was issued. (Copy of adjustment letter No.719-24/Edu dated 15.03.2017 is annexure "K")
12. That feeling aggrieved from the order dated 11.10.2017, the Appellant filed Departmental Appeal on dated 25.10.2017, before Respondent No.2.(Copy of Departmental Appeal dated 25.10.2017 is annexure "L").
13. That the Appellant frequently visited the office of Respondent No.3 for consideration of his departmental appeal but the official Authority delayed the matter and wants some more time for consideration, for which the appellant sent another reminder for consideration of departmental appeal on dated 15.01.2018.(Copy of Reminder application dated 15.01.2018 is annexure "M").
14. That the Appellant was informed that his departmental Appeal is under consideration and will be discussed with Respondents No. 2, but again respondents No.3 delayed the matter and lastly the appellant was informed that their other colleagues have filed their promotion appeals and he will also be treated when those appeals were finally decided.
15. That the appeals of other colleagues of the Appellant were finally decided by this Hon'able Tribunal on dated 14.07.2021 where all the appeals were accepted and the appellants in those appeals were held entitled for promotion from the date, the first batch of

4

their other colleagues at provincial level were promoted in the year 2014 with all consequential benefits.

(Copy of the Judgment dated 14.07.2021 of this Hon'able Tribunal in appeal No. 1266/2018 and connected appeals is annexure "N")

16. That due to the above mentioned reasons since seniority of the appellant was disturbed, Appellant had therefore locus standi to file this appeal, hence **Appellant** has no option but to knock the door of this honorable Court for his fundamental rights guaranteed under the constitution of Islamic republic of Pakistan, 1973.

GROUNDS:-

- I. That the Appellant has not been treated in accordance with law, and his rights secured and guaranteed under the law and constitution have been violated.
- II. That as per rules the respondents are duty bound to follow the APT Rules and the specified quota, but the same are not being followed by the respondents for a long time which is clear violation of fundamental rights of Appellant. Moreover the same APT Rules 1989, have been following in all Govt. Departments since its inception.
- III. That the Appellant has the required eligibility to promote since the Appellant has fulfilled the required criteria and job experience but was not promoted after quite long time but even when the Respondents No.1 to 2 promoted the appellant from dated 24th July, 2014, Respondents No.3 did not consider the same from its due date but delayed the process.
- IV. That the discrimination as observed by the respondents with Appellant is highly deplorable and condemnable, being unlawful, unconstitutional, without authority, without jurisdiction, against the norms of natural justice and equity and against the law on subject, hence liable to be declared as such.
- V. That the acts of the respondents No.3 & 4 not making promotion order of the Appellant from 24th July, 2014 is against the law and rules and as such the respondents are under obligation to make his promotion order according to the said Notification dated 24th July, 2014.
- VI. That the act of respondent No.4 not providing the category wise list (Male/Female) as per proforma along with photo copies of documents of the candidates for promotion against the post of SST is based on malafide, on ulterior motive and against the norm of natural justice.
- VII. That the action on the part of the Respondents have adversely affecting Appellant financial rights as protected by the constitution and the Appellant be treated at par like other employees of other District who were promoted from the 24th July, 2014 and as such to be equally dealt in accordance with the law and rules.

(5)

- VIII. That even the Appellant reported the matter to the respondents though various applications to observe the meritocracy policy but respondents are not issuing appropriate direction in this regard because Appellant is suffering for no fault on her part and as such all the appropriate direction needs to be issued to the respondents for complete redressal of the grievances of Appellant.
- IX. That the Appellant seek the permission of this Hon'able court to rely on additional grounds at the hearing of this petition.

It is therefore, most humbly prayed that on acceptance of the instant appeal:

- (A) An appropriate direction may please be issued and the promotion order of the Appellant may kindly be ordered from the date of Notification i.e 24th July, 2014 by convening the meeting of DPC immediately like other employees of his own district as well of the other districts.**
- (B) That appellant may kindly be compensate with all back benefits from the date of Notification i.e 24th July, 2014 till the disposal of this Service Appeal.**
- (C) And any other relief not specifically prayed and to which the Appellant is found entitled may also be granted.**

Aj Shuj

APPELLANT

THROUGH

Abdur Rahman Mohmand

ABDUR RAHMAN MOHMAND
ADVOCATE HIGH COURT
PESHAWAR.

NOTE:

No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'able Tribunal.

Advocate.

Abdur Rahman Mohmand

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

S.A.No...../2022

ALIM KHAN **VERSUS GOVERNMENT OF KHYBER
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY
AND SECONDARY EDUCATION PESHAWAR AND OTHERS.**

AFFIDAVIT:

I, ALIM KHAN S/O FAIZ ULLAH KHAN SST GENERAL (BPS-16)
P.O. PARA CHINAR ZERRAN MULA BAGH TEHSIL UPPER
KURRAM DISTRICT KURRAM, do hereby solemnly affirm and
declare on oath that the contents of the instant appeal are true
and correct to the best of my knowledge and belief and, that
nothing has been concealed or kept secret from this Hon'able
court.

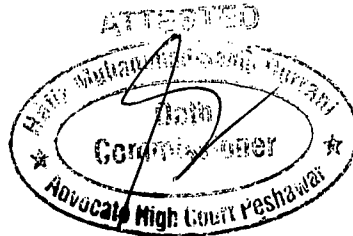
Identified By Advocate



**ABDUR RAHMAN MOHMAND
ADVOCATE HIGH COURT, PESHAWAR.**



DEPONENT



7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

S.A.No...../2022.

ALIM KHAN **VERSUS** GOVERNMENT OF KHYBER
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY
AND SECONDARY EDUCATION PESHAWAR AND OTHERS.

ADDRESSES OF THE PARTIES:

APPELLANT:

ALIM KHAN S/O FAIZ ULLAH KHAN SST GENERAL (BPS-16) P.O.
PARA CHINAR ZERRAN MULA BAGH TEHSIL UPPER KURRAM
DISTRICT KURRAM.

RESPONDENTS:

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY ELEMENTARY AND SECONDARY EDUCATION
SECRETARIATE BUILDING PESHAWAR.
2. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.
3. THE DIRECTOR EDUCATION NEWLY MERGED
DISTRICTS WARSAK ROAD, PESHAWAR.

.....

DATED:10.09.2022


APPELLANT

THROUGH



ABDUR RAHMAN MOHMAND
ADVOCATE HIGH COURT PESHAWAR.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

S.A.No...../2022.

ALIM KHAN **VERSUS** GOVERNMENT OF KHYBER
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY AND
SECONDARY EDUCATION PESHAWAR AND OTHERS.

APPLICATION FOR CONDINATION OF DELAY IN ABOVE
TITLED CASES IF ANY.

1. That the impugned appeals are filed before this Hon'able court and is fixed for today.
2. That there are some delay in the above titled appeals but the said delay was never intentional but due to verbal promises of the respondents.
3. That the Respondent No.3 hand over the matter in dispute to Respondents No.2 who accompanied the appellatant to civil secretariat Peshawar to resolve the issue but the respondents delayed the matter.
4. That even law favours adjudication of cases on merit rather on technicalities.
5. That there is no legal bar on acceptance of this petition.

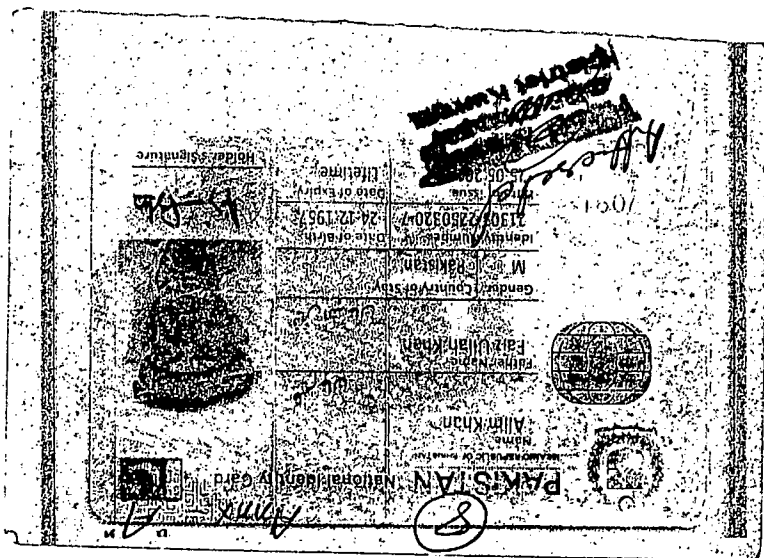
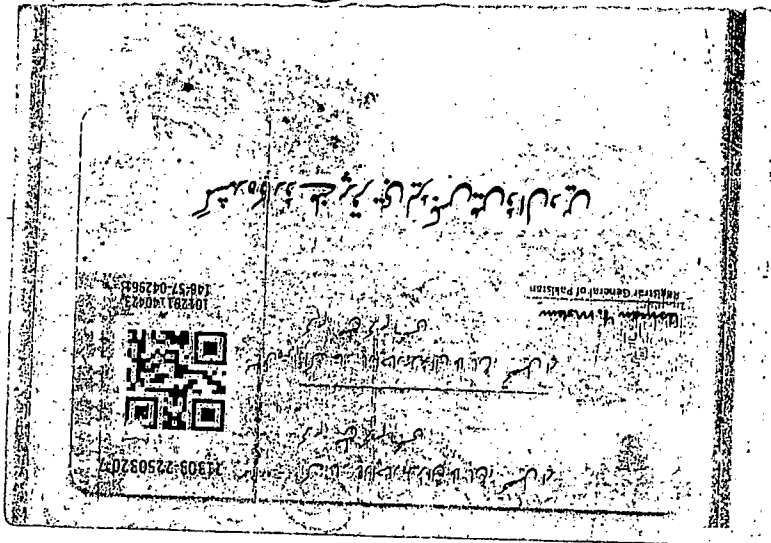
It is therefore requested that on acceptance of this petition the above titled appeal may kindly be condoned in the best interest of justice.

Through

Aj Farid
Appellant

Abdur Rahman Mohmand
Abdur Rahman Mohmand
Advocate High Court
Peshawar.

ATTESTED



University of Peshawar

(Pakistan)

Session: Annual 1996

ALIM KHAN SON OF FAIZ ULLAH KHAN

and a student

of KURRAM AGENCY having passed the prescribed examination

held in APRIL, 1997, is this day admitted by the University of Peshawar

to the Degree of

Master of Arts

in the SECOND Division.

The subject of Examination being FASHTO

The Examination was taken as a whole / in parts.

[Signature]

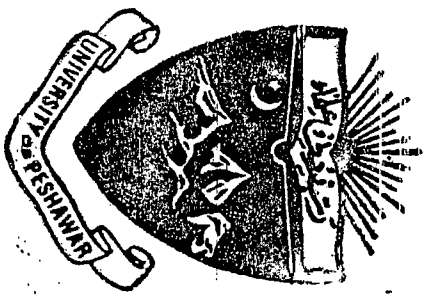
[Signature]
Assistant District Officer P & D Kurram
Attest

Serial No: 021889

Registered No: 84-P/A-11382

Roll No. 10171

Result declared on SEPTEMBER 25, 1997



Countersigned

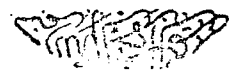
[Signature]
Vice-Chancellor

ATTESTED

5

9

University of Jeshawat
(Pakistani)



ATTESTED

[Signature]

Session ANNUAL 1994

ALIM KHAN / SON of FAIZ-U-LLAH KHAN / and a student

of KURMAN AGENCY / having passed the prescribed examination

in DECEMBER 1994, is hereby admitted by the University of Jeshawat to the degree of

Bachelor of Education

In the Division in Theory

In the Division in Teaching Practice

In the Division in Aggregate

She/He also passed as additional/optional subject.

Assistant District Registrar
Officer P&D Kurman

[Signature]

The Examination was taken as a whole / in parts.

[Signature]
Registrar

Countersigned

[Signature]
Vice-Chancellor



Registered No. 84-P/A-11382

Enrollment No. 525

Result declared on MAY 21, 1995

Serial No 006155

10

Amir - A/2

Annex - A/3

EDUCATION DEPARTMENT;

N.-W.F.P., PESHAWAR,



CERTIFICATE OF TEACHING.

Q. No. 1
ATTESTED

Marks obtained... 458/1200... /1000X

Division... Third.

ROLL NO.....558.....

Certified that..... Alim. Khan.....

born on 24-12-1957..... (Twenty Fourth..... Ninteen hundred and Fifty Seven.....) December

son/Daughter of..... Faiz-u-llah. Khan.....

resident of..... Mula. Bagh..... Tehsil..... Parachinar..... District..... Kurram Agency.

having passed the Certificate of Teaching Examination held in 19 90 is qualified to teach in the Middle Department of an Angle-Vernacular School.

Trained at the Government Training School, .. Private.....

Attested
Amir
Assistant District Education Officer P&D Kurram

Dated Peshawar,

The..... 14-11-19 90.

Amirullah
Registrar,
Departmental Examinations,
Education Department, Peshawar.

(11)

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DOMICILE CERTIFICATE

Certified that Mrs. Alim Khan s/o Faizullah Khan

belongs to a recognised tribe of Para Section Chamkani

Sub Section Lisiani and his father

is/was a permanent bonafide resident of village Mullahbagh Kurram

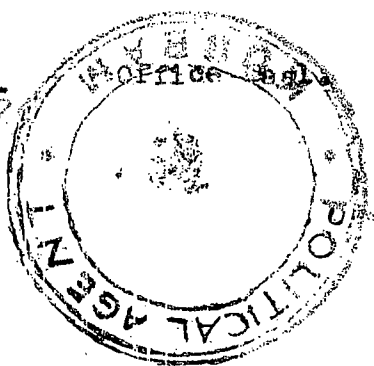
Agency. He is an eligible candidate to avail himself of the seats

reserved for the Tribal Areas of Peshawar Division Peshawar Backward

Areas (Kurram Agency.)

Tehsildar Mulla Khan : Political Officer Political Agent,
Tehsildar Nawal Khan : Kurram. Kurram.

No: 6613
Dated 08/7



Attested
[Signature]

[Signature]
ATTESTED

(13)

OFFICE OF THE DIRECTOR OF EDUCATION (FACIL.) N.W.F.P. PESHAWAR

OFFICE ORDER

APPOINTMENTS & TRANSFERS

Consequent upon the selection of untrained Drawing Masters for training the following appointments and transfers of Drawing Masters are hereby ordered with effect from the dates of their taking over charge in the interest of public service. Fresh candidate will get Rs. 315/- PM fixed plus usual allowances as admissible under the rules:

Sr:No.	Name & Designation	Proposed posting	Remarks
1.	Mr. Arab Nawaz D.M GMS, Gul Shah Jan Kot (NWA)	GMS, Haji Far Jan Kili (Mohmande)	vice Jehanzeb selected for DM training.
2.	Mr. Ghaffar Ali, DM GMS, Ghowa Khowa (SWA)	GMS, Gul Shah Jan Kot (NWA)	vice Sr:No. 1
3.	Mr. Said Rais Khan, DM GMS, Tooti Bagh (Orakzai Agency)	GMS, Watoen (FR Jannu)	vice Ghulam Rasim selected for DM training
4.	Mr. Mohammad Iqbal, DM GMS, Tiarza (SWA)	GMS, Tooti Bagh (Orakzai)	vice Sr:No. 3
5.	Mr. Fida Hussain Shah S/O Sohna Shah Trd: candidate	GMS, Margoona (SWA)	Against vacant DM post
6.	Sh: Habbil Gul S/O Sh: Mijan Gul (Mat: with Drg:)	GMS, Dadinsai Tangi (SWA)	--do--
7.	Mr. Rehmanullah S/O Shad Amir (Mat: with Drg:)	GMS, Toppi (NWA)	vice Javed Iqbal whose services have been terminated.
8.	Mr. Shafiq Ahmad S/O Abdur Rahim (Mat: with Drg:)	GMS, Ashorwal (FR Kohat)	vice Anwar Iqbal Untai whose services are terminated on account of wilful absence from duty.
9.	Mr. Aleem Khan S/O Faizullah Khan (Trd: Candidate)	GMS, Amal Kot (Kurram)	vice Khadim Hussain selected for DM training.
10.	Mr. Mohd Yousof S/O Gulab Noor (Mat: with Drg:)	GMS, Datta Kheil (NWA)	vice Nawab Khan selected for DM training
11.	Mr. Shamsul Arifin S/O Fazli Amin (Mat: with Drg:)	GMS, Ghowa Khowa (SWA)	vice Ghaffar Ali transferred at S.No. 2
12.	S. Israr Hussain S/O S. Mohd Jaffar (Mat: with Drg:)	GMS, Borki (Kurram)	Against vacant post
13.	S. Sadiq Hussain S/O S. Dadchsh Hussain (Mat: with Drg:)	GMS, Ibrahimzai (Kurram)	--do--

Aleem Khan S/O
Faizullah Khan
S/O Mullah Bagh
Kurram Agency

Attested
Amaze

GOVERNMENT OF PESHAWAR
N.W.F.P.

ATTESTED

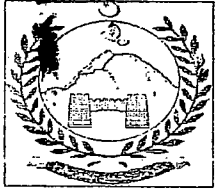
- Notes:-
1. Charge reports should be submitted in duplicate to all concerned.
 2. Their appointment is being made purely on temporary basis and is liable to termination at any time without notice and without assigning any reason. In case they wish to resign their post they shall have to give one month's notice to the Selection Committee.
 3. Their original Qualification, date of birth and domicile certificate should be checked before they are handed over charge of the post and attested copies thereof be kept on the record.
 4. TA/DA and transfer grant is not allowed.
 5. They should be sent to the Agency/Civil Surgeon concerned for Medical Examination the day on which they report their arrival for duty and no pay should be drawn for them unless and until they produce their medical and Agency certificate from the said Surgeon.
 6. Their verification roll of character and antecedent should be got completed and verified from the authorities concerned.
 7. The pay scale and service rules would be subject to revision in accordance with the orders to be passed by the Govt of N.W.F.P from time to time.
 8. They should not be handed over charge of the post if they are below (18) or above (30) years of age, if they fail to resume charge within two weeks, their vacancies should be reported to this office ATONCE.
 9. The appointment order of Aleem Khan S/O Faizullah Khan at Govt Middle School, Ibrahimzai, issued under Endst: No. 20233-97/A-1/DM Vol: II, dated 31.3.1978 is hereby cancelled.

H. Hidayatullah
(PRSG HEDAYATULLAH KHAN)
DIRECTOR OF EDUCATION
(S) (PA) NWFP, PESHAWAR.

223669-97
Endst: No. /A-1/DM(70) Vol: I Dated 20/11/78

Copy forwarded for information and necessary action to the:-

- 1) Private Secretary to Adviser to WIA Zone "B" for Education,
- 2-5) Distt: Inspector of Schools, Miranshah, SWA Bank, Qraizai at Mangu and Kurran, Peshawar.
- 6-9) Head Master, Govt High School, Haji Yar Jan Killi, Tarsa, Datta Khel and Akhorwal.
- 10-19) Head Master, Govt Middle School, Gul Shah Jan Kot, Ghova Khova, Tooti Bagh, Wateen, Margoosa, Badinzai, Tangi, Tappi, Ibrahimzai, Borki and Anai Kot.
- 20-28) Candidates concerned.
29. TA clerk in local Directorate.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

(1)

ATTESTED

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

(2)



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

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

(3)

(Signature)
ATTESTED



17

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

(1)

[Signature]
ATTESTED

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

Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar.
No. 4954/F.No. SST Promotion to SS Posts
Dated Peshawar the 7/8 2014

To
The Director of Education (FATA),
FATA Secretariat Warsak Road, Peshawar.

Subject: - DEPARTMENTAL PROMOTION FROM SCTS/CT/SDM/DM/ SAT/ AT/ST/TT & S, QARIES/QARIES TO THE POST OF SSTs (BS-16 REGULAR.
SPT/PSI

Memo:
In continuation of this Directorate letter No. 4874 date 06-08-2014 on the subject cited above and to request you to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules already conveyed to you under the above cited letter number and date under intimation to all concerned.

7/8/14
Deputy Director (Estb)
Elementary & Secy: Education
Khyber Pakhtunkhwa
7/9/14

Endst: No. _____

Copy of the above is forwarded for information to:-

1. PS to Minister for E&SE Khyber Pakhtunkhwa.
2. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department.
3. PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar.

Deputy Director (Estb)
Elementary & Secy: Education
Khyber Pakhtunkhwa

7/9/14
ATTESTED

7/9/14
ATTESTED

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24/07/2014, the following SCTs/CTs/DMs/SATs/STTs/Ts/Qari/PSHTs/SPSTs and PSTs are hereby promoted to the post of SST (Bio-Chem) SST (Phy-Maths) SST (General), noted against each BPS-16 (Rs:10000-8000-34000) plus usual allowance as admissible under the rules on regular basis under the existing policy of the Provincial Govt, on the terms and condition given below with immediate effect and further they all are hereby adjusted against vacant posts noted against each on "School based"

**A. 1. PROMOTION OF SCT/CT/PHST/SPST TO THE POST OF SST
(Bio-Chem) BPS-16**

Sr No	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1	Mr. Shabab Hussain CT	GHS Shahu Khel	GHS Lodhi Khel	AVP
2	Muhammd Raham Jan. CT	GMS Sero Khel	GHS Mamoon Banda	-do-
3	Muhammad Sharif PST	GPS Gandiri Waziran	GHS Gandir Waziran	-do-
4	Khial Dar Khan DM	GCMHS No.1 Hangu	GCMHS No.1 Hangu	-do-

**PROMOTION OF SCT/CT/PHST/SPST TO THE POST OF SST
(Phy-Maths) BPS-16**

Sr No	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1	Mr. Muhammad Yousaf SCT	GHS Naryab	GHS Naryab	AVP
2	Noor Sahib Khan CT	GHS, Muhammad Khawaja	GHS, Muhammad Khawaja	-do-
3	Azmat Ali CT	GHS Ibrahimzai	GCMHS No.1 Hangu	-do-
4	Majeed Gul CT	GHS Kahi Hangu	GHS Kahi	-do-
5	Rehmat Khan CT	GHS No.2 Hangu	GHS No.2 Hangu	-do-
6	Muhammad Hilal CT	GHS Ibrahimzai	GCMHS No.1 Hangu	-do-
7	Qayum Gul CT	GHS Thall	GHS, Sarozai Hangu	-do-
8	Amir Khanan CT	GMS Alwara Miia	GHS, Bilyamina	-do-
9	Abdul Samad PST	GPS No.2 Chapri Naryab	GHS, Shanawori Naryab	-do-

**PROMOTION OF SCT/CT/PHST/SPST TO THE POST OF SST
(GENERAL) BPS-16**

Sr No	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1	Sami ud Din SCT	GCMHS No.1 Hangu	GCMHS No.1 Hangu	AVP
2	Ashraf Hussain SCT	GHS Naryb	GHS Naryb	-do-
3	Saeed ud Din SCT	GHS Karbogha	GHS Darsamand	-do-
4	Inab Gul SCT	GHS Kahi	GHS Kahi	-do-
5	Aman ullah Khan SCT	GHS Mianji Khel	GMS Qadri Banda	-do-
6	Nizam Khan SCT	GHS Serozai	GMS Tari Banda	-do-
7	M. Murad Khan	SCT GCMHS No 1 Hangu	GCMHS No 1 Hangu	-do-
8	Mr. Mumtaz Ullah SCT	GHS Karbogha	GHS, Torawori	-do-
9	Gul Qadeer Ahmad SCT	GHS Togh Sarai	GHS, Togh Sarai	-do-
10	Habib Ali SCT	GHS Ibrahimzai	GHS, Ibrahimzai	-do-
11	Muhammad Raheem SCT	GHS Bagato	GMS, Turki Banda	-do-
12	Ain ullah SCT	GHS Togh Sarai	GHS Togh Sarai	-do-
13	Shafi ur Rehman SCT	GHS Chamba Gul	GHS Chamba Gul	-do-
14	Ihsan ud Din SCT	GHS Thall	GHS, Chamba Gul	-do-
15	Muhammad Karim SCT	GCMHS No.1 Hangu	GHS Thall	-do-
16	Khana Din SCT	GHS Dallen	GCMHS No.1 Hangu	-do-
17	Shah Muhammad SCT	GCMHS No.1 Hangu	GHSS Dallen	-do-
18	Sajad Hussain SCT	GHS Serozai	GHS, Shahu Khel	-do-
19	Qabil Bad Shah SCT	GHS Togh Sari	GHS Sarozai	-do-
20	Muslim Bad Shah SCT	GHS Shanawori Naryab	GHS, Shanawori Naryab	-do-
21	Munawar Khan SCT	GHS Chamba Gul	GMS, Togh Chaper	-do-

Attested

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NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No.SO (PE)/4-5/SSRC/Meetin/2013/Teaching Cadre dated 24.07.2014, the following SCTs/CTS/DMS/SATs/STTS /TTs/Qari/PHSTs/SPSTs and PSTs are hereby promoted to the post of SST (Bio-Chem) SST (Phy-Math) SST (General) noted against teach BPS-16 (Rs.10000-800-34000) plus usual allowance as admissible under rules on regular basis under the existing policy of the provincial Govt, on the terms and condition given below with immediate effect and further they all are hereby adjusted against vacant posts noted against each on "school based

A. 1. Promotion of SCT/CT/PHST/SPST to the post of SST
(Bio-Chem) BPS-16

Sr. No.	Name of Official	Presence place of posting	Name of school	Remarks
1.	Mr. Shabab Hussain CT	GHS Shahu Khel	GHS Lodhi Khel	AVP
2.	Muhammad Rahim Jan, C.T.	GMS Sero Khel	GHS Mamoon Banda	-do-
3.	Muhammad Sharif, P.S.T.	GPS Candiri Waziran	GHS Gandir Waziran	-do-
4.	Khial Dar Khan DM	GCMHS No.1, Hangu	GCMHS No.1, Hangu	-do-

Promotion of SCT/CT/PHST/SPST to the post of SST
(Phy-Maths) BPS-16

Sr. No.	Name of Official	Presence place of posting	Name of school	Remarks
1.	Mr. Muhammad Yousaf SCT	GHS Naryab	Where adjusted	
2.	Noor Sahib Khan CT	GHS Muhammad Khawaja	GHS Naryab	AVP
3.	Azmat Lai CT	GHS Ibrahimzai	GHS Muhammad Khawaja	-do-
4.	Majeed Gul CT	GHS Kahi Hangu	GCMHS No.1 Hangu	-do-
5.	Rehmat Khan CT	GHS No.2 Hangu	GHS Kahi	-do-
6.	Muhammad Hilal CT	GHS Ibrahimzai	GHS, NO.2, Hangu	-do-
7.	Qayum Gul CT	GHS Thall	GCMHS No.1 Hangu	-do-
8.	Amir Khanan CT.	GMS Alwara Mila	GHS, Sarozai Hangu	-do-
9.	Abdul Samand, P.S.T.	GHS No.2 Chapri Naryab	GHS, Bilyamina	-do-
			GHS Shanawori Haryab	-do-

Promotion of SCT/CT/PHST/SPST to the post of SST

General BPS-16

Sr. No.	Name of Official	Presence place of posting	Name of school	Remarks
1.	Mr. Muhammad Yousaf SCT	GCMHS No.1 Hangu	Where adjusted	
2.	Noor Sahib Khan CT	GHS Naryab	GCMHS No.1 Hangu	AVP
3.	Azmat Lai CT	GHS Karbogha	GHS Naryab	-do-
4.	Majeed Gul CT	GHS Kahi	GHS Darsamand	-do-
5.	Rehmat Khan CT	GHS Mianji Khle	GHS Kahi	-do-
6.	Muhammad Hilal CT	GHS Serozai	GMS Qadri Banda	-do-
7.	Qayum Gul CT	SCT GCMHS No.1, Hangu	GMS Tari Banda	-do-
8.	Amir Khanan CT.	GHS Karbogha	GCMHS No.1, Hangu	-do-
9.	Abdul Samand, P.S.T.	GHS Togh Sarai	GHS, Toawari	-do-
10.	Habibi Ali SCT	GHS Ibrahimzai	GHS, Togh Sarai	-do-
11.	Muhammad Raheem, SCT	GHS Bagoto	GHS, Ibrhaimzai	-do-
12.	Ain Ullah SCT,	GHS Togh Sarai	GMS, Turki Banda	-do-
13.	Shafi ur Rehman SCT,	GHS Chamba Gul	GHS Togh Sarai	-do-
14.	Ihsan ud Din, SCT,	GHS THall	GHS, Chamba Gul	-do-
15.	Muhammad Karim SCT	GCMHS No.1, Hangu	GHS Thall,	-do-
16.	Khana Din SCT,	GHSS Dallan	GCMHS No.1, Hangu	-do-
17.	Shah Muhammad SCT	GCMHS No.1 Hangu	GHSS Dallan	-do-
18.	Sajad Hussain SCT,	GHS Serozai	GHS Shahu khel	-do-
19.	Qabil Bad Shah SCT	GHS TOghsari	GHS Serozai	-do-
20.	Muslim Bad Shah SCT	GHS Shanawori Naryab	GHS Khazina	-do-
21.	Munawar Khan, SCT	GHS Chamba Gul	GHS Shanawori Naryab	-do-
			GMS, Togh Chaper	-do-

Attested

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ATTESTED

1. Muhammad Riaz SCT.	GHS Darshi	GHS Darshi	-do-
2. Mumtaz Gul SCT.	GHS Kahi	GHS Kahi	-do-
3. Afrah ud Din SCT.	GHS Thall	GHS Thall	-do-
4. Mujeeb ur Rehman SCT.	GHS Mianji Khel	GHS Thall	-do-
5. Habib Gul PST.	GHS Gandiri Waziran	GHS Gandiri Waziran	-do-
6. Farid Khan PST.	GPS Shaikhhan Banda	GMS Wach Bazar.	-do-
7. Muazam Ali PST.	GPS Ibrahimzai No. 1	GHS Ibrahimzai.	-do-
8. Shfaq Hussain PST.	GPS Chapri Hangu.	GHS Shahu Khel.	-do-
9. Wali Muhammad Khan PST.	GPS Srazmaka No. 1	GMS Azimi Banda	-do-
10. Jamil Ahmad PST.	GPS Shanawori Hangu	GHS Shanawori Hangu	-do-
11. Mr. Muhammad Sadique PST.	GPS Jadedd Banda	GMS Sero Khel	-do-
12. Muhammad Iqbal PST.	GPS No. 4 Hangu.	GHS Shanawori Hangu.	-do-
13. Khalid Mehmood PST.	GPS Warasta No 1.	GMS Darband	-do-
14. Rabil Kha Jan PST.	GPS Navi Dand	GHS Chapri Waziran	-do-
15. Hayat Munanmad Khan PST.	GPS Shekh Wali Korona	GHS Chapri Waziran	-do-
16. Muhammad Nauman PST.	GPS No. 1 Sero Zai.	GHS Mamoon Banda.	-do-
17. Musam Gul PST.	GPS Chamba Gul	GMS Amar Chma	-do-
18. Bait Ullah SDM.	GHS Bagato	GHS Bagato.	-do-
19. Awal Noor Khan SDM.	GHSS Dallan	GHS Mamoon Banda	-do-
20. Saif ur Rehman SDM.	GHS Muhammad Khawaja	GHS Muhammad Khawaja	-do-
21. Nazir Ullah SAT.	GHS Muhammad Khawaja	GHS Kotki Bala	-do-
22. Mr. Hidayat Ullah SAT.	GCMHS No. 1 Hangu	GMS Barh Abas Khel	-do-
23. Mr. Abdur Rehman SAT.	GHS No. 2 Hangu.	GHS No 2 Hangu	-do-
24. Salih Din STT.	GCMHS No. 1 Hangu.	GMS Samana.	-do-
25. Bakhtiar Ahmad Shakir TT	GMS Shamal Din	GMS Torawori.	-do-
26. Ijaz Ahmad TT	GCMHS No. 1	GHS No. 2 Hangu.	-do-
27. Abdur Rehman Qari	GHSS Doaba	GHSS Doaba	-do-
28. Zia ul Haq Qari	GCMHS No. 1 Hangu.	GMS Hangu.	-do-

Terms & Conditions

1. They would be on a probation for a period of One Year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their Service Services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se-Seniority will remain intact.
6. No TADA etc is allowed for joining his duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that if any overpayment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
8. They will be governed by such rules and regulation as may be issued from time to time by government.
9. Their posting will be made on school based they will have to served at the place of posting and their services is not transferable to any other station.
10. Before taking over charge once again their documents may be check if they have not the required relevant qualification as per rules they may not be handed over charge of the post.

DISTRICT EDUCATION OFFICER
(MALE) HANGU

Endst No 3493-3562/ SST Promotion/Estab Dated Hangu the 31.10.2014

1. Copy of the above is forwarded for information and necessary action to the.
2. Accountant General Khyber Pakhtun Khwa Peshawar.
3. PS to Secretary to Government of Khyber Pakhtun Khwa Elementary & Secondary Education Department Peshawar.
4. PA to Director Elementary & Secondary Education Khyber, Pakhtun Khwa Peshawar
5. District Account Officer Hangu
6. All Principals/Headmasters concerned
7. SDEC (Male) Hangu
8. Accountant Middle School Local Office
9. Official concerned
10. Master File.

DISTRICT EDUCATION OFFICER
(MALE) HANGU

Attested

ATTESTED

ATTESTED

23. Muhammad Riaz SCT,	GHS Darshi	GHS Darshi	-do-
24. Mumtaz Gul SCT,	GHS Kahi	GHS Kahi	-do-
24. Aftab ud Din SCT,	GHS Thall	GHS Thall	-do-
25. Mujeeb ur Rehman SCT,	GHS Mianji khel	GHS Thall	-do-
26. Habib Gul P.S.T,	GHS Gandiri Waziran	GHS Gandiri Waziran	-do-
27. Farid Khan P.S.T	GPS Shaikan Banda	GMS Wach Bazar	-do-
28. Muazam Ali P.S.T	GPS Ibrhaimzai No.1	GHS Ibrahimzai	-do-
29. Ishiq Husain P.S.T	GPS Chapri Hangu	GHS Shahu Khel	-do-
30. Wali Muhammad Khan P.S.T	GPS Srazamaka No.1	GMS Azimi Banda	-do-
31. Jamil Ahmad P.S.T	GPS Shanawori Hangu	GPS Shanawori Hangu	-do-
32. Mr. Muhammad Sadique P.S.T	GPS Jadded Banda	GMS Sero Khel	-do-
33. Muhammad Iqbal P.S.T	GPS No.4, Hangu	GMS Shanawori Hangu	-do-
34. Khalid Mehmood P.S.T	GPS Warasta No.1	GMS Darband	-do-
35. Rabil Kha Jan P.S.T	GPS Navi Dand	GHS Chapri Waziran	-do-
36. Hayat Muhammad Khan P.S.T	GPS Sheikh Wali Korona	GHS Chapri Waziran	-do-
37. Muhammad Nauman P.S.T	GPS No.1 Sero Zai	GMS Mamood Banda	-do-
38. Musam Gul P.S.T	GPS Chamba Gul	GMS Anar Chima	-do-
39. Bait Ullah SDM	GHS Bagoto	GMS Bagoto	-do-
40. Awal Noor Khan SDM	GHS Dallan	GHS Mamoon Banda	-do-
41. Saif ur Rehman SDM	GHS Muhammad Khwaja	GHS Muhammad Khwaja	-do-
42. Nazir Ullah SAT,	GHS Muhammad Khwaja	GHS Kotki Bala	-do-
43. Mr. Hidayat Ullah SAT,	GCMHS No.1, Hangu	GMS Barh Abas Khel	-do-
44. Mr Abdur Rehman SAT,	GHS No.2, Hangu	GMS No.2 Hangu	-do-
45. Salih Din SST	GCMHS No.1, Hangu	GMS Samana	-do-
46. Bakhtiar Ahmad Shakir TT	GMS Shamal Din	GMS Torawori	-do-
47. Ijaz Ahmad TT	GCMHS No.1	GHS No.2 Hangu	-do-
48. Abdur Rehman Qari	GHSS Doaba	GHSS Doaba	-do-
49. Zia ul Haq Qari	GCMHS No.1, Hangu	GMS Hangu	-do-

TERMS AND CONDITION:-

1. They would be on probation for a period of one year extendable for a further period of one year.
2. They will be governed by such rules and regulations as and when issued from time to time by the provincial Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se seniority remain intact.
6. NO TADA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in the list of this order will be recovered and if he/she is wrongly promoted, he/she will be reverted.
8. They will be governed by such rules and regulation as many be issued from time to time by government.
9. Their posting will be made on school based they will have to served at the place of posting and their services is not transferable to any other station.
10. Before taking over charge once again their documents may be check if they have not the required relevant qualification as per rules they may not be handed over charge of the post.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) HANGU

Endst. No.3493-3562/SST promotion/Estab Dated Hangu the 31.10.2014
Copy of the above is forwarded for information and necessary action to tile.

1. Accountant General Khyber Pakhtunkhwa, Peshawar
2. PS to Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.
3. PA to Director Elementary & Secondary Education Department, Peshawar.
4. All principles/Headmasters/ concurred
5. SDEO (Male) Hangu
6. Accountant Middle School Local Office
7. Official concerned.
8. Master File

Attested

ATTESTED

ATTESTED

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Annx - F



Jahangir

FATA SECRETARIAT
DIRECTORATE OF EDUCATION
KPK, WARSAN ROAD PESHAWAR, PAKISTAN

NO. 2587-2601
DATED 9-3-15
E-6 UP GRADATION

MOST IMMEDIATE.

To

All the Agency Education Officers
In FATA.

Subject. DEPARTMENTAL PROMOTION FROM THE POST OF
SCTS/CT/SDM/DM/SAT/AT/STT/TT&S, QARIESQARIES TO THE
POST OF SSTs (BS-16) Regular.

Memo;

I am directed to enclose herewith the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa letter No.4954/F.No.SST promotion to SST posts dated 7/8/2014 alongwith criteria on the above noted subject.

Keeping in view the criteria; kindly prepare category wise list (Male/Female) as per below proforma alongwith photo copies of documents of the candidate for promotion against the post of SST for onward submission to the quarter concerned please.

S.No	Name of Teachers	Name of School	Desig;	BPS.	Academic Qualification	Professional Qualification	Date of 1st Apptt; on present post.	Domicile

Sd/
Deputy Directress (Estab)

Endst;No. 2602-3 / Dated 9-3 2015.

Copy to;

1. Deputy Director (Estab) Elementary & Secondary Khyber Pakhtunkhwa w/r to his letter mentioned above and telephonic discussion with Supdt; (Estab) E&SE Khyber Pakhtunkhwa that the information as per proforma may be checked & necessary guidance may be intimated if any please.
2. P.A to Director Education FATA.

P
Attested

Sd/
Deputy Directress (Estab)

ATTESTED

P
ATTESTED



FATA SECRETARIAT
DIRECTORATE OF EDUCATION
KHYBER PAKHTUNKHWA, WARSAK ROAD PESHAWAR, PAKISTAN
PHONE. 091-9210166 FAX 091-9210216

No. _____ Date ____/____/2017

Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of Kurram Agency, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each in RPS-16 (Rs. 18910-2520-64510) plus usual allowances, as admissible under the rules on regular basis under the existing policy, on the terms and condition given below, with immediate effect in the interest of public service.

A. SST (Bio/Chem)

1. PROMOTION OF SCT/CT TO SST (Bio/Chem) BPS-16.

Total No. of SST vacant post of SSTs (Bio/Chem)	
25% share initial recruitment	24
75% share for Promotion.	6
40% Share of promotion of Senior CT/CT	18
Posts available for promotion	9
Promoted through this order	9
	8

S.No	Sl.No	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular CT	Qualification	Remarks
1	56	Muhammad	GHS Kung Ali Zai	23/1/1966	25/12/1993	Bsc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
2	58	S. Hussain Akbar Shah	GHS Kirman	5/8/1966	25/12/1993	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
3	96	Muhammad Qasim Ull Din	GHS Angori	2/3/1975	19/9/1998	M.Sc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
4	108	Gohar Ali	GHS Shingok	29/10/1968	21/9/1998	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
5	131	Ashiq Hussain	GMS Parachinar	23/3/1963	1/3/2001	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
6	189	Muhammad Khan	GHS Pekar	2/3/1972	16/9/2004	MSc (Hon)/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
7	199	Wahid Hussain	GMS Karakhela	3/1/1979	6/12/2005	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
8	223	Muhammad Hanif	GMS Kemal Baza	12/6/1982	13/10/2009	MSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

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2. PROMOTION OF PSHT/SPST/PST TO SST (Bio/Chem) BPS-16.

Total No. of SST vacant post of SSTs (Bio/Chem)	
25% share initial recruitment	24
75% share for Promotion.	6
64% Share of promotion of PSHT/SPST/PST	18
Posts available for promotion	5
Promoted through this order	5
	3

S.No	Sl.No	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular PST	Qualification	Remarks
1	76	S. Anwar Hussain	GPS Yaqoobi No-2	3/10/1966	31/10/1994	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

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2	356	Qaim Hussain	GPS Aka khej	26/4/1981	13/10/2009	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
3	366	Sajid Hussain	GMS Yardah	17/3/1984	13/10/2009	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

3. PROMOTION OF S.TT/IT TO SST (Bio/Chem) BPS-16.

Total No. of SST vacant post of SSTs (Bio/Chem)	24
25% share initial recruitment	6
75% share for Promotion.	18
4 % Share of promotion of S.TT/IT	01
Posts available for promotion	01
Promoted through this order	01

S. No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular DM	Qualifi- cation	Remarks
1 ✓	164	S.Ahmad Shah	GHS Qubadshakh el	10/4/1979	1/9/2003	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

4. PROMOTION OF S.Qari/Qari TO SST (Bio/Chem) BPS-16.

Total No. of vacant Posts of SST (Bio/Chem)	24
25% share initial recruitment	6
75% share for Promotion.	18
4 % Share of promotion of S.Qari/Qari	01
Posts available for promotion	01
Promoted through this order	01

S.No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular Qari	Qualifi- cation	Remarks
1	12	Atta-ud Din	GHS Sadda	30/12/1981	1/9/2004	MSc.M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

B. SST (Phy-Maths)

1. PROMOTION OF SCT/CT TO SST (Mph/Maths) BPS-16.

Total No. of SST vacant post of SST (Phy-Maths)	24
25% share initial recruitment	6
75% share for Promotion.	18
40 % Share of promotion of Senior CT/CT's	10
Posts available for promotion	10
Promoted through this order	10

S.N o	Sl: N o.	Name of Officials	Place of posting	D/O Birth	Date of Appott; regular CT	Qualifi- cation	Remarks
1 ✓	60	Sardar Hussain	GHS Zeran	19/3/1968	25/12/1993	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
2	61	Inayat Hussain	GISHS Parachinar	2/4/1968	25/12/1993	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
3 ✓	63 ✓	Majeed Hussain	GHS Luqmankhe	17/4/1969	25/12/1993	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
4	64	S.Sajjad Hussain	GISHS Parachinar	26/4/1969	25/12/1993	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further pposting against SST Phy/Math (BPS-16) post.
5	75	Muhammad Sadiq Khan	GHS Makhizai	18/2/1970	5/10/1995	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.

11/10/12

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6	106	Anjad Hussain	GSIHS Parachinar	4/10/1967	21/9/1998	MSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
7	107	S.Mubarak Shah	GHS Mastikot	16/4/1968	21/9/1998	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
8	112	Ashiq Hussain	GHS Kirman	8/2/1966	1/10/1998	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
9	113	Kamal Hussain	GHS Mirjamal	4/4/1965	3/11/1998	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
10	125	Muhib Ali	GHS Nastikot	5/4/1966	11/11/2000	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.

2. PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-16

Total No. of SST vacant post of SSTs (Phy-Maths)	24
25% share initial recruitment	06
75% share for Promotion.	18
20 % Share of promotion of PSHT/SPST/PST.	05
Posts available for promotion	05
Promoted through this order	03

S.N	Sl:No.	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular PST	Qualification	Remarks
1	98	Amanullah Jan	GPS Shani Sehra	5/5/1970	9/1/1995	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
2	148	S.Shahid Iqbal Shah	GPS Dand Dad Mir	10/11/1964	27/2/1998	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
3	305	Javid Hussain	GMS Parachina	1/4/1977	1/9/2005	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.

ITEM NO.3. PROMOTION OF STT/TT TO SST (Phy-Maths) BPS-16 ON REGULAR BASIS.

The case of promotion of STT/TT to the post of SST (Phy-Maths) BPS-16 was considered and the DFC recommended as under:-

Total No. of SST vacant post of SSTs (Phy-Maths)	24
25% share initial recruitment	06
75% share for Promotion.	18
04 % Share of promotion of Senior TT/TT	01
Posts available for promotion	01
Promoted through this order	01

S.N	Sl:No.	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular TT	Qualification	Remarks
1	163	Muzahir Ali	GHS Pewar	4/4/1975	1/9/2003	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.

C. SST (General)

1. PROMOTION OF Sr; CT/CT TO SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	12
75% share for Promotion.	36
40 % Share of promotion of Sr; CT/CT	16
Posts available for promotion	16
Promoted through this order	16

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S. No	S.I. No	Name of Official	Place of Posting	Date of Birth	Date of Appoint: as Regular CT	Qualification	Remarks
1	7	S.Hussain Afzal	GSNHSS Shalozan	15/7/1962	18/6/1987	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
2	8	Amir Habibullah Khan	GMHS Sadda	20/4/1964	8/7/1987	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
3	9	Mehboob Ali	GHS Borki	20/4/1958	29/11/1987	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
4	14	Israr Hussain	GSNHSS Shalozan	12/4/1963	29/11/1987	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
5	20	Dildar Hussain	GISHS Parachinar	6/9/1965	17/10/1989	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
6	25	Khadim Hussain	GHS Kunj Ali Zai	7/5/1960	14/11/1990	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
7	29	Jehan Muhammad	GHS Chappri	20/2/1963	14/11/1990	MA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
8	30	S.Muhammad Ali Shah	GHS Kirman	3/3/1963	14/11/1990	MA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
9	35	Zinat Hussain	GISHS Parachinar	6/4/1962	22/10/1991	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
10	40	S.Ahmad Raza	GISHS Parachinar	5/2/1965	5/3/1992	MA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
11	41	Mansab Ali	GHS Kirman	1/3/1966	5/4/1992	MA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
12	42	S.Iqbal Hussain	GISHS Parachinar	1/2/1966	27/5/1992	MA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
13	43	AbdulGhayur Khan	GHS Bilyamin	1/11/1957	22/11/1992	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
14	44	S.Imdad Hussain	GHS Qubadshakhel	8/3/1971	2/3/1993	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
15	46	Janan Hussain Alizai		11/11/1967	7/3/1993	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
16	48	S.Kamal Hussain	GHS Mali Kali	25/8/1969	27/4/1993	BA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.

3. PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	48
25% share initial recruitment	12
75% share Promotion.	36
20% Share for promotion of PSHT/SPST/PST	8
Posts available for promotion	8
Promoted to fill this order	8

S.No	S.I. No.	Name of Official	Place of Posting	Date of Birth	Date of Appoint: regular PST	Qualification	Remarks
1	15	Muhammad Yaqub Khan	GPS Khapayana	6/5/1963	25/1/1986	MA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.

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2	16	Khan Muhammad	GPS Tangai	25/12/1962	20/8/1986	MA/	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.
3	25	Irshad Hussain	GPS Alankhel	6/4/1967	17/9/1987	MA/M.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.
4	33	Muhammad Rehman	GPS Sakhi Ahmad Shah	27/1/197	17/1/1990	BA/B.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.
5	42	Abid Hussain Khan Kali	GPS Abdullah	20/2/1969	24/9/1991	BA/B.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.
6	46	Rashid Ali	GPS College Colony	15/3/1968	22/10/1991	BA/M.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.
7	49	Gul Hussain	GPS Noorki	22/4/1965	4/3/1992	BA/B.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.
8	52	Muhammad Ibrahim	GPS No-2 Parachinar	29/1/1971	4/3/1992	MA/B.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.

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3. PROMOTION OF SDM/DM TO SST (General) BPS-.

Total No. of SST General (M) Posts vacant Posts	24
25% share initial recruitment	6
75% share for Promotion.	18
4 % Share of promotion of SDM/DM	1
Posts available for promotion	1
Promoted through this order	1

S. No	S.I. No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular DM	Qualification	Remarks
1	1	Aleem Khan	GHS Kirman	24/12/1957	19/10/1978	MA/B.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.

4. PROMOTION OF SAT/AT TO SST (General) BPS-16 ON REGULAR BASIS

The case of promotion of SAT/AT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	6
75% share for Promotion.	18
4 % Share of promotion of SAT/AT	1
Posts available for promotion	1
Promoted through this order	1

S. No	S.I. No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular AT	Qualification	Remarks
1	23	S.Nabi Hussain	Kunj Ali Zai	1/1/1969	1/9/2000	MA/B.Ed	Services placed at the disposal of AEO Kurrām for further posting against SST General (BPS-16) post.

5. PROMOTION OF STI/TT TO SST (General) BPS-16.

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	6
75% share for Promotion.	18
4 % Share of promotion of STI/TT	1
Posts available for promotion	1
Promoted through this order	1

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S.No	S.L. No	Name of Official	Place of Posting	Date of Birth	Date of Appoint as Regular TP	Qualification	Remarks
1		Arbab Hussa	ISHS Parachinar	1/4/1970	26/11/1989	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16)

5. PROMOTION OF S.Qari/Qari (General) BPS-16.

Total No. of vacant Posts (General)	24
25% share initial recruitment	6
75% share for Promotion	18
4 % Share of promotion of S.Qari/Qari	1
Posts available for promotion	1
Promoted through this order	1

S.No	S.L. No	Name of Official	Place of Posting	Date of Birth	Date of Appoint as Regular TP	Qualification	Remarks
1	10	Aziz Ahmad	GHS Ghuzghari	10/7/1978	1/9/2004	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by the Provincial Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/She will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the AEO concerned.

(Hashim Khan)
Director Education FATA

Dated Peshawar the 11/10/2017.

Endst: No. 16101-50

Copy forwarded for information and necessary action to the:-

1. Accountant General (PR) Sub Office, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Agency Education Officer Kurram Agency.
4. Agency Accounts Officer Kurram Agency.
5. PS to ACS FATA.
6. PS to the Secretary SSD, FATA Secretariat, Peshawar.
7. PS to the Secretary Finance Department FATA Secretariat Peshawar.
8. PA to Director Education, FATA.
9. Promotees Concerned.
10. M/File.

11/10/17
Addl. Director (Estab)
Directorate of Education, FATA

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OFFICE OF THE AGENCY EDUCATION OFFICER
KURRAM AGENCY AT PARACHINAR

P.NO.0926311391 Fax No.0926311391

Email:- kysah110@gmail.com

ADJUSTMENT

Consequent upon the approval by Departmental Selection Committee and Director of Education FATA Peshawar Endst No. 16/01-50 dated 11-10-2017, the following C.T/A.T/D.M/T.T and PST are hereby adjusted against the vacant SST posts in BPS-16 in the schools noted against their names with effect from 18-10-2017 :-

S #	Name of Teacher/Designation	Existing School	Place of Adjustment
1	Mr, Muhammad C.T	GHS Kunj Alizai	GHS Kunj Alizai against vacant post
2	S.Hussain Akbar Shah C.T	GHS Kirman	GHS Kirman against vacant post
3	Mr, Gohar Ali C.T	GHS Shingak	GHS Burki against vacant post
4	Mr, Ashiq Hussain C.T	GMS Parachinar	G.I.S.H.S Parachinar against vacant post
5	Mr, Muhammad Khan C.T	GHS Pawan	GHS Pawan against vacant post
6	Mr, Wahid Hussain C.T	GMS Karakhela	G.I.S.H.S Parachinar against vacant post
7	S.Anwar Hussain PST	GHS Samir	GHS Mahoora against vacant post
8	Mr, Qaim Hussain PST	GPS Kundizar	GHS Mali Kali against vacant post
9	Mr, Sajid Hussain PST	GMS Yardah	GHS Mali Kali against vacant post
10	S.Ahmad Shah T.T	GHS Qubadshah Khel	GHS Bughdi against vacant post
11	Mr, Sardar Hussain C.T	GHS Zeran	GHS Qubadshah Khel against vacant post
12	Mr, Inayat Hussain C.T	G.I.S.H.S Parachinar	G.I.S.H.S Parachinar against vacant post
13	Mr, Majeed Hussain C.T	GHS Luqman Khel	G.S.N.H.H.S.S Shalozan against vacant post
14	S.Sajjad Hussain C.T	G.I.S.H.S Parachinar	G.I.S.H.S Parachinar against vacant post
15	Mr, Amjad Hussain C.T	G.I.S.H.S Parachinar	G.S.A.H.M.H.S Parachinar against vacant
16	S.Mubarak Shah C.T	GHS Nastikot	G.S.A.H.M.H.S Parachinar against vacant
17	Mr, Ashiq Hussain C.T	GHS Kirman	GHS Kirman against vacant post
18	Mr, Kamal Hussain C.T	GHS Mir Jamai	GHS Mir Jamal against vacant post
19	Mr, Muhib Ali C.T	GHS Nastikot	GHS Nastikot against vacant post
20	Mr, Aman Ullah Jan PST	GPS Shnai Sehra	G.S.A.H.M.H.S Parachinar against vacant
21	Mr, Javid Hussain PST	GMS Parachinar	GHS Mali Kali against vacant post
22	Mr, Muzahir A.T	GHS Pawan	GHS Pawan against vacant post

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23	S.Qabil Hussain D.M	GMS Shakardara	GHS Zeran against vacant post
24	S.Hussain Afzal C.T	G.S.N.H.H.S.S Shalozan	GMS Karakhela against vacant post
25	Mr, Mehboob Ali C.T	GHS Burki	GHS Burki against vacant post
26	Mr, Israr Hussain C.T	G.S.N.H.H.S.S Shalozan	GIS Bughdi against vacant post
27	Mr, Dildar Hussain C.T	G.I.S.H.S Parachinar	GMS Bughaki against vacant post
28	Mr, Khadim Hussain C.T	GHS Kunj Alizai	GHS Amalkot against vacant post
29	S.Ahmad Raza C.T	G.I.S.H.S Parachinar	GMS Khomosa against vacant post
30	Mr, Mansab Ali C.T	GIS Kirman	GHS Kirman against vacant post
31	S.iqbal Hussain C.T	G.I.S.H.S Parachinar	GHS Bughdi against vacant post
32	S.Imdad Hussain C.T	GHS Qubadshah Khel	GHS Qubadshah Khel against vacant post
33	S.Kamal Hussain C.T	GHS Mali Kali	GMS Jallander against vacant post
34	Mr, Irshad Hussain PST	GPS Alam Khel Pewar	GHS Terimangal against vacant post
35	Mr, Abid Hussain PST	GPS Abdulilah Khan Kali	GHS Shingak against vacant post
36	Mr, Rashid Ali PST	GPS College Colony	G.I.S.H.S Parachinar against vacant post
37	Mr, Gul Hussain PST	GPS Noorki	GMS Mirmai against vacant post
38	Mr, Muhamad Ibrahim F.T	GPS No.2 Parachinar	GMS Kachkina against vacant post
39	Mr, Alim Khan D.M	GHS Kirman	GMS Shakardara against vacant post
40	S.Nabi Hussain A.T	GHS Kunj Alizai	GMS Kharlachi against vacant post
41	Mr, Arbab Hussain T.T	G.I.S.H.S Parachinar	GHS Nastikot against vacant post
42	Mr, Muhammad Bashir E.M	GHS Pewar	GHS Shingak against vacant post
43	Mr, Gulfam Hussain T.T	GHS Kirman	GHS Zeran against vacant post

S. No - 39
Alim Khan SAM
GHS Kirman

S. No 36
Rashid Ali PST
GPS College Colony

Agency Education Officer
Kurram Agency Parachinar

Endst No 1190-1232 Edu

Dated 18/10 /2017

Copy forwarded to the:-

1. Director of Education FATA Peshawar with reference to his No.cited above please.
2. Principals/Headmasters concerned.
3. Agency Accounts Officer Kurram Agency
4. Teachers concerned
5. Office file.

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Agency Education Officer
Kurram Agency Parachinar

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

Handwritten signatures and notes in Urdu at the top right of the page.

No. SO. PE.14-S/SSRC/Meeting/2012/Teacher Cadres- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Order No. & Date as above.

Copy forwarded to:-

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

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

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Section Officer (Primary)

(Handwritten initials)

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APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16)	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3; (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3.

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3/11

4% DM

4% PET

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			(iv) one per cent from amongst Instructional Material Specialis with atleast five years service such and having qualificati mentioned in column No. 3; and
			(v) one per cent from amongst Arabic Teachers with at least fi years service as such and havi qualification mentioned in Colur No.3; and
2.	Senior Arabic Teacher (SAT) (BPS-16)		(b) fifty per cent by initial recruitment.
3.	Senior Theology Teacher (STT) (B-16)		By promotion, on the basis of seniority-cu fitness, from amongst Arabic Teachers, with least five years service as such and havi qualification as prescribed for init recruitment of Arabic Teacher.
4.	Senior Certified Teacher (SCT) (General) (BPS-16)		By promotion, on the basis of seniority-cu fitness, from amongst Theology Teachers, wi at least five years service as such and havi qualification as prescribed for initial recruitme of Theology Teacher.
			By promotion, on the basis of seniority-cu fitness, from amongst Certified Teache (General), with at least five years service as stu and having qualification as prescribed for initi recruitment of Certified Teacher (General).

1%

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AT

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DM(M)

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FATA SECRETARIAT
Directorate of Education
 Warsak Road Peshawar, Pakistan
 Phone: 091-9210166 Fax 091-9210216

No. _____ /
 dated ____/____/20__

Annex - J

Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt: of Pakistan Finance Division (Regulation Wing) Notification No.1(32)R-1/2015-582/2016 dated 25.7.2016 Islamabad, SO (Edu) Notification No.FS/SO(Edu)/SSD/Up-Gradation/2882-94 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-60 dated 8.8.2016, the following DM (M) B-15 are hereby promoted to the post of Sr.DM (M) B-16 (Rs.15880-1280-54280) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with effect from 20.2.2013 and further they will be posted in the Govt: Higher Secondary / High Schools by the Agency Education Officer concerned against the newly upgraded Sr.DM BPS-16 posts.

Total No. of DM (M) Posts duly verified by the AAO	78
1/3 share of Senior DM Posts	26
Share of promotion 100%	26
Already promoted to B-16 SDM	Nil
No of Senior DM Posts available for promotion	26
Recommended for promotion to Sr. DM	26

S#	Sen: No.	Name	Name of school	Date of Birth	Date of Apptt: charge as regular DM	Remarks
1	1	Alim Khan	GMS Shakardara	24/12/1957	19/10/1978	Services placed at the disposal of AEO Kurram for further posting.
2	2	Sayed Ali Shah	GMS Yousuf Khel	20/3/1955	10/01/1980	Services placed at the disposal of AEO Kurram for further posting.
3	3	Tahir Ali	GHS Kirman	24/10/1961	10/05/1980	Services placed at the disposal of AEO Kurram for further posting.
4	8	Habib Hussain	GHS Shalozan	18/8/1960	10/01/1982	Services placed at the disposal of AEO Kurram for further posting.
5	10	Muhammad Bashir	GHS Pewar	28/3/1964	10/01/1982	Services placed at the disposal of AEO Kurram for further posting.
6	14	S Mubarak Shah	GMS Karakhela	02/12/1966	09/01/1984	Services placed at the disposal of AEO Kurram for further posting.
7	15	S Basharat Hussain	GHS Bughdi	14/8/1966	09/01/1984	Services placed at the disposal of AEO Kurram for further posting.
8	16	Sayed Hussain	GMS Ali Shari	26/3/1967	03/01/1986	Services placed at the disposal of AEO Kurram for further posting.

(Signature)
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9	17	Qul Hussain	Teran	07/09/1964	08/01/1986	Services placed at the disposal of AEO Kurram for further posting.
10	18	Saifullah		05/09/1964	31/05/1987	Services placed at the disposal of AEO Kurram for further posting.
11	21	Rafiq Hussain	GMS Kharlachi	06/01/1964	14/11/1990	Services placed at the disposal of AEO Kurram for further posting.
12	23	Liaqat Ali	GHS Kharlachi	06/09/1963	20/10/1991	Services placed at the disposal of AEO Kurram for further posting.
13	25	Ghulam Muhammad	GISHS Parachinar	04/01/1968	22/11/1992	Services placed at the disposal of AEO Kurram for further posting.
14	20	Hidayat Hussain	GHS Dilyamine LK	16/04/1962	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
15	27	Qambar Ali	CMS Khomasa	03/11/1970	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
16	28	S Gulfam Hussain	GHS Kirman	02/11/1971	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
17	29	Tajir Hussain	GHS Qubad Shah Khel	01/01/1972	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
18	30	Mohd Tahir	GMS Arawali LK	12/01/1967	01/09/1994	Services placed at the disposal of AEO Kurram for further posting.
19	31	Rias Khan	GHS Uchat LK.	01/12/1966	01/09/1995	Services placed at the disposal of AEO Kurram for further posting.
20	32	Amir Rehman	GMS Tarai	03/12/1967	01/09/1995	Services placed at the disposal of AEO Kurram for further posting.
21	35	Muhammad Ilyas	GHS Bagan LK.	13/04/1968	25/05/1996	Services placed at the disposal of AEO Kurram for further posting.
22	38	Shaban Ali	GHS Mali Khel	05/04/1971	27/2/1998	Services placed at the disposal of AEO Kurram for further posting.
23	39	Amir Jan	GHS Badama	18/11/1967	20/9/1998	Services placed at the disposal of AEO Kurram for further posting.
24	40	Aziz Ullah	GHS Makhi Zai LK	04/01/1976	20/9/1998	Services placed at the disposal of AEO Kurram for further posting.
25	41	Siraj Ali	GMS Bughaki	04/01/1967	21/9/1998	Services placed at the disposal of AEO Kurram for further posting.

Terms & Conditions:

1. They would be on probation for a period of one year, extendible for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

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4. Charge report should be submitted to all concerned.
5. Their Inter Se Seniority on the lower post will remain intact.
6. No TAVDA is allowed for joining him/her duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that any over payment is made to him in the light this order will be recovered and if he is wrongly promoted, he will be reversed.

(Hashim Khan)
Director Education FATA

Endst: No. 4041-4080 /File No.1/Promotion Senior CT B-16 dated 28/12/2017

Copy for information and necessary action is forwarded to the:

1. Accountant General (PR) Sub Office, Peshawar.
2. Agency Education Officer, Kurram Agency.
3. Additional Agency Education Officer Kurram.
4. Agency Accounts Officer, Kurram Agency.
5. PS to Additional Chief Secretary FATA
6. PS to Secretary SSD, FATA.
7. PS to secretary Finance.
8. PA Director Education, local Directorate.
9. Official concerned.
10. Master File.

11
17/02/28/12/17
Addl: Director (Estab)
Directorate of Education, FATA


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Annex "K"

OFFICE OF THE AGENCY EDUCATION OFFICER
KURRAM AGENCY AT PARACHINAR
Phone.No.0926311391 Fax No.0926311391
Email:- kysah110@gmail.com

ADJUSTMENT OF SDM MALE (BPS-16)

Consequent upon the Promotion order issued by the Director Education FATA KP Peshawar vide Endst: No: 4041-4090/File No 1/ Promotion Senior DM B-16 Dated 28.2.2017 the following SDMs BPS-16 are hereby adjusted against the post of SDM in the School noted against their names on the terms and conditions given below in the best interest of Public Service w.e.f 20.2.2013

Sen: No.	Name of Teacher	Name of school	Name of School where adjusted	Remarks of adjustment/Posting
1	Alim Khan	GMS Yousafkhel	GHS Kirman	Against SDM post
2	Sayed Ali Shah	GMS Yousuf Khel	GHS Luqman Khel	Rtd: Adjusted for post pension benefits.
3	Tahir Ali	GHS Kirman	GHS Samir	Rtd: Adjusted for post pension benefits.
4	Habib Hussain	GSNHHSS Shalozan	GSNHHSS Shalozan	Against his origl:post
5	Muhammad Bashir	GHS Pewar	GHS Pewar	Against his origl:post
6	S Mubarak Shah	GMS Kachkeena	GHS Malana	Against SDM post
7	S Basharat Hussain	GMS Ali Shari	GSNHHSS Shalozan	Against SDM post
8	Sayed Hussain	GHS Bughdi	GHS Bughdi	Against his origl:post
9	Gul Hussain	GHS Zeran	GHS Zeran	Against his origl:post
10	Rafiq Hussain	GHS Nasti Kot	GHS Nasti Kot	Against his origl:post
11	Liaqat Ali	GMS Kharlachi	GHS Shingak	Against SDM post
12	Ghulam Muhammad	GISHS Parachinar	GISHS Parachinar	Against his origl:post
13	Qambar Ali	GMS Khomasu	GSIAHS Mali Kali	Against his SDM post
14	S Gulfam Hussain	GHS Zeran	GHS Zeran	Against his origl:post
15	Tajir Hussain	GHS Qubad Shah Khel	GHS Qubad Shah Khel	Against his origl:post
16	Shaban Ali	GMS Ibrahim Zai	GHS Mali Khel	Against his SDM post
17	Siraj Ali	GMS Bugnaki	GSAHMHS Parachinar	Against his SDM post

Terms and Conditions:

- 1) They will be on probation for a period of one year extendable for another one year
- 2) They will be governed by such rules and regulations is issued from time to time by the government.
- 3) Their services can be terminated at any time in case their performance is found unsatisfactory during probation period in case of mis-conduct they will be preceded under the rules framed from time to time
- 4) Charge report should be submitted to all concerned
- 5) Their inter seniority on lower post will remain intact
- 6) No TA/DA is allowed for joining his/her duty


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Kurram Agency Parachinar

7) They will give an undertaking to be recorded in their service books to the effect that if any over payment made to them in the light of this order will be recovered from them and if they are wrongly promoted, they will be reversed

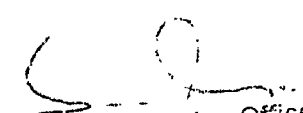
CONSEQUENTIAL TRANSFER
DM BPS-15

S.No:	Name of Teacher	Name of School	Name of School where adjusted	Remarks of adjustment/Posting
1	Iqbal Hussain	GHS Kirman	GHS Yousaf Khel	Vice S.No:1
2	Zahir Ali	GHS Malana	GMS Kachkina	Vice S.No:6
3	Sahwat Hussain	GSNHSS Shalozan	GMS Ali Shari	Vice S.No:7
4	Gul Hussain	GHS Mali Khel	GMS Ibrahimzai	Vice S.No:23
5	Qamar Ali	GHS Mali Kali	GMS Khumasa	Vice S.No:15
6	Irshad Hussain	GHS Shingak	GMS Kharlachi	Vice S.No:12
7	Waris Ali	GAHMHS Parachinar	GMS Boghak	Vice S.No:26
8	S.Iftikhar Hussain	GHS Luqman Khel	GHS Luqman Khel	Vice S.No:2
9	S.Qabil Hussain	GHS Samir	GHs Samir	Vice S.No:3


(SYED HUSSAIN AFRIDI)
Agency Education Officer
Kurram Agency Parachinar

Endst.No. 719-24 /Edu Dated. 15.3.2017

- Copy to the;
1. Director Education FATA Secretariat Peshawar
 2. Accountant General Khyber Pakhtunkhwa Peshawar.
 3. Agency Accounts Officer Kurram Agency at Parachinar.
 4. AAEOs Local Office
 5. Official concerned
 6. Office file.
 7. *All the concerned DDOS.*


Agency Education Officer
Kurram Agency Parachinar


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Ann "L"

TO,

THE DIRECTOR EDUCATION FATA
FATA SECRETARIAT DIRECTORATE OF EDUCATION
KHYBER PAKHTUNKHWA, WARSAK ROAD
PESHAWAR.

DEPARTMENTAL APPEAL AGAINST ORDER DATED
11.10.2017 FOR DISCRIMINATION, VIOLATION OF
FUNDAMENTAL RIGHT AND NON OBSERVANCE OF
PROMOTION/SENIORITY OF THE APPELLANT FROM THE
DATE OF NOTIFICATION NO.SO(PE)/4-
5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY,
2014 FOR PROMOTION OF STT/TT TO SST (GENERAL) BPS-
16.

.....
RESPECTED SIR!

Appellant submits as under:

1. That the Appellant was appointed as Drawing Master (DM) on dated 17.10.1978 through Endst:No.223669-97 by your worthy department and has performed his duties on different locations with honesty and full devotion and has been a responsible, hard worker, skillful, dutiful, punctual and obedient teacher and presently the Appellant has promoted to the post of Secondary School Teacher (SST BPS-16) and is posted at GHS Kirman District Kurram at Parachinar.
2. That the Government of Khyber Pakhtunkhwa Elementary and Secondary Education through NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 and recommendation of the Departmental Promotion Committee has promoted the Appellant to the post of Secondary School Teacher (SST BPS-16).
3. That the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through letter No.4954 dated 07.08.2014 and letter No.4874 dated 06.08.2014 requested you to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules.
4. That after requesting again and again by the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through different letters your worthy office delayed the process and did not consider the Appellant for his due promotion.
5. That following the above mentioned same Notification, the District Education Officer Male Hangu through Endst No.3493-3562 dated 31.10.2014 promoted 49 SCTs/CTs, SDMs/DMs,


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SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs, to the post of SST (Bio-Chem), SST (Phy-Maths), SST(General) BPS-16.

6. That your August office has not observed the appellant promotion from his due date i.e 24th July,2014 according to Notification and has order the same through letter Endst No.16101-50 dated 11.10.2017, So Appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.
7. That this order of your office has affected the Seniority/promotion of the Appellant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and FATA are the same and not considering the appellant from the due date adversely affect the appellant right for seniority in Subject Specialist in Higher Secondary School as well as Headmasters in High Schools which is clear violation of fundamental rights of Appellant.
8. That the discrimination as observed by this office with Appellant is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms of natural justice, equity and against the law on subject, hence liable to be declared void ab initio.
9. That the act of your good office' not making promotion order from the date of Notification of Khyber Pakhtunkhwa i.e 24th July,2014 is based on malafide, and ulterior motive.
10. That the action on the part of your good office has been affecting adversely appellant financial rights as protected by the constitution and the Appellant be treated at par like other employees who are promoted and as such to equally dealt in accordance with the law and rules.

It is therefore, most humbly prayed that on acceptance of the instant appeal an appropriate direction may please be issued and the promotion order of the Appellant may kindly be ordered from the date of Notification i.e 24th July,2014 and any other relief not specifically prayed and to which the Appellant is found entitled may also be granted.

ATTESTED

DATED:25-10-2017

Aj Khan
APPELLANT

ALIM KHAN S/O FAIZ ULLAH KHAN SST GENERAL (BPS-16) P.O. PARA CHINAR ZERRAN MULA BAGH TEHSIL UPPER KURRAM DISTRICT KURRAM.

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Annex "M"

TO,

**THE DIRECTOR EDUCATION FATA
FATA SECRETARIAT DIRECTORATE OF
EDUCATION KHYBER PAKHTUNKHWA, WARSAK
ROAD PESHAWAR.**

REMINDER FOR CONSIDERATION OF DEPARTMENTAL APPEAL AGAINST UNJUST ORDER DATED 11.10.2017 FOR DISCRIMINATION, VIOLATION OF FUNDAMENTAL RIGHT AND NON OBSERVANCE OF PROMOTION/SENIORITY OF THE APPELLANT FROM THE DATE OF NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24TH JULY, 2014 FOR PROMOTION OF PSHT/SPST/PST TO SST (GENERAL) BPS-16.

.....
RESPECTED SIR!

Appellant submits as under:

That in continuation of the departmental appeal dated 25.10.2017 on the subject cited above and to request you that the promotion order of the Applicant may kindly be ordered from the date of Notification i.e 24th July,2014 because your August office has not observed the applicant promotion from his due date i.e 24th July,2014 according to Notification and has order the same through letter Endst No.16101-50 dated 11.10.2017, So Applicant has not been treated in accordance with law, and applicant rights secured and guaranteed under the law and constitution have been violated. Furthermore this order of your office has affected the Seniority/promotion of the Applicant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and FATA are the same and not considering the applicant from the due date adversely affect the applicant right for seniority in Subject Specialist in Higher Secondary School as well as Headmasters in High Schools which is clear violation of fundamental rights of Applicant.

It is therefore requested that applicant promotion order may kindly be reviewed in the light of the departmental appeal dated:25.10.2017 in the best interest of justice.

DATED:15-01-2018

APPLICANT

Alim Khan
ALIM KHAN S/O FAIZ ULLAH KHAN SST GENERAL
(BPS-16) P.O. PARA CHINAR ZERRAN MULA BAGH
TEHSIL UPPER KURRAM DISTRICT KURRAM.

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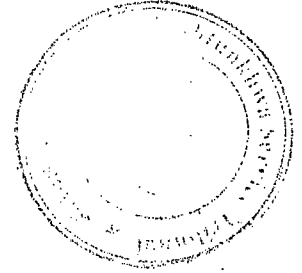
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Annex "N"

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1266/2018

Date of Institution ... 09.10.2018
Date of Decision ... 14.07.2021



Afzal Shah SST (BIO/CHEM BPS-16) Government High School Sandu Khel
Mohmand Agency Government of Khyber Pakhtunkhwa Education Department.
... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary and
Secondary Education Secretariat building Peshawar and eight others.
... (Respondents)

MR. HIDAYAT ULLAH KHATTAK &
MR. ABDUR REHMAN MOHMAND
Advocates

... For Appellants

MR. MUHAMMAD RIAZ AHMED PAINDAKHEIL
Assistant Advocate General

... For Respondents

MR. SALAH-UD-DIN ...
MR. ATIQ-UR-REHMAN WAZIR ...

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):- This judgment shall dispose of
the instant Service Appeal as well as the following connected Service Appeals as
common question of law and facts are involved therein.


- 1) Service Appeal bearing No.1267/2018 titled "Abi Hayat Versus Government of
Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education
Secretariat building Peshawar and others",

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- 2) Service Appeal bearing No. 1268/2018 titled "Shams Ur -Rahman Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 3) Service Appeal bearing No. 1269/2018 titled "Karim Khan Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 4) Service Appeal bearing No. 1270/2018 titled "Abdul Hakim Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 5) Service Appeal bearing No. 1271/2018 titled "Stana Gul Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 6) Service Appeal bearing No. 1272/2018 titled "Mohammad Idress Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 7) Service Appeal bearing No. 1273/2018 titled " Mansoor Ahmad Khan Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 8) Service Appeal bearing No. 1274/2018 titled " Khial Zada Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 9) Service Appeal bearing No. 1275/2018 titled "Nizam-ud-Din Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 10) Service Appeal bearing No. 1276/2018 titled "Sher Mohammad Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".


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ATTESTED

SECRETARY
KHYBER PAKHTUNKHWA
PESHAWAR

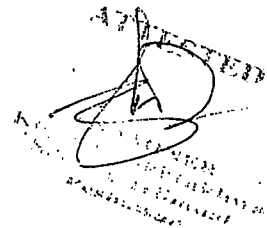
- 11) Service Appeal bearing No. 1277/2018 titled "Rahmat Said Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 12) Service Appeal bearing No. 1278/2018 titled "Javid Akhter Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 13) Service Appeal bearing No. 1279/2018 titled "Munawar Khan Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 14) Service Appeal bearing No. 1280/2018 titled "Said Alam Shah Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 15) Service Appeal bearing No. 1281/2018 titled "Lateef Ullah Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 16) Service Appeal bearing No. 1282/2018 titled "Mst. Khalida Safi Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 17) Service Appeal bearing No. 1283/2018 titled "Zar Gul Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 18) Service Appeal bearing No. 1284/2018 titled "Imtiaz Gul Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 19) Khaista Sher Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".

ATTESTED

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

- 20) Service Appeal bearing No. 327/2019 titled "Abdul Hamid Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 21) Service Appeal bearing No. 651/2018 titled "Sabeel Hassan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 22) Service Appeal bearing No. 652/2018 titled "Anwar Ali Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 23) Service Appeal bearing No. 653/2018 titled "Javed Hassan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 24) Service appeal bearing No. 654/2018 titled "Luqman Hakeem Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 25) Service Appeal bearing No. 655/2018 titled "Aziz-ur-Rehman Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 26) Service Appeal bearing No. 656/2018 titled "Muhammad Muneer Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 27) Service Appeal bearing No. 657/2018 titled "Mst. Shah Begum Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 28) Service Appeal bearing No. 658/2018 titled "Munir Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 29) Service Appeal bearing No. 659/2018 titled "Mst. Fahmeeda Begum Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 30) Service Appeal bearing No. 660/2018 titled "Muhammad Baz Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 31) Service Appeal bearing No. 661/2018 titled "Hanif Jan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 32) Service Appeal bearing No. 662/2018 titled "Sher Afzal Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".


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- 33) Service Appeal bearing No. 663/2018 titled "Mst. Dil Taj Begum Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 34) Service Appeal bearing No. 664/2018 titled "Raees Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 35) Service Appeal bearing No. 665/2018 titled "Syed Hijab Hussain Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 36) Service Appeal bearing No. 666/2018 titled "Eid Muhammad Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 37) Service Appeal bearing No. 667/2018 titled "Fazal Hakeem Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 38) Service Appeal bearing No. 668/2018 titled "Syed Zamir Hussain Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 39) Service Appeal bearing No. 669/2018 titled "Janat Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 40) Service Appeal bearing No. 670/2018 titled "Ayan Ali Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".
- 41) Service Appeal bearing No. 671/2018 titled "Sohail Khan Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".

02. Brief facts of the case are that the appellants are primarily aggrieved by inaction of the respondents to the effect that promotions of the appellants were delayed for no good reason, which adversely affected their seniority positions as well as sustained financial loss. The appellant, Mr. Afzal Shah and 18 others were serving under Agency Education Officer, Mohmand Agency (Now District Mohmand) and the appellant Mr. Khaista Sher and 22 others were serving under Agency Education Officer, Orakzai Agency (Now District Orakzai). All the appellants were promoted to the post of Secondary School Teachers (SST) (BPS-16) vide order dated 11-10-2017, which, as per stance of the appellants were required to be to be promoted in 2014.

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KHYBER PAKHTUNKHWA
CIVIL SECRETARIAT
PESHAWAR

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Feeling aggrieved, the appellants preferred respective departmental appeals against the impugned order dated 11-10-2017, which were not responded to, and hence the appellants filed service appeals in this Tribunal with prayers that promotions of the appellants may be considered from 24-07-2014 or the date when other employees serving in settled districts were promoted along with all back benefits.

03. Written reply/comments were submitted by the respondents.

04. Learned counsel for the appellant Mr. Afzal Shah and 18 others has contended that the appellants have not been treated in accordance with law and their rights secured under law and constitution have been violated; that the respondents delayed promotions of the appellants for no good reason, which adversely affected their seniority positions and made them junior to those, who were promoted at settled district level in 2014; that the delay occurred due to lethargic attitude of respondents, otherwise the appellants were equally fit for promotion like their counterparts working in settled districts; that the appellants were discriminated which is highly deplorable, being unlawful and contrary to the norms of natural justice; that inaction on part of the respondents have adversely affected financial rights of the appellants as protected by the Constitution. He further added that the appellant be treated at par like other employees of districts who were promoted in 2014 in pursuance of notification dated 24-07-2014 and shall equally be dealt with in accordance with law and rules.

05. Learned counsel for the appellant Mr. Khaista Sher and 22 others mainly relied on the arguments of the learned counsel for the appellant Mr. Afzal Shah and 18 others with further arguments that departmental appeals of the appellants were not considered and the appellants were condemned unheard; that as per constitution every citizen is to be treated equally, while the appellants have not been treated in accordance with law, which need interference.

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06. Learned Assistant Advocate General appeared on behalf of respondents has contended that as per Para-VI of promotion policy, promotions are always made with immediate effect and not with retrospective effect; that promotion is neither a vested right nor it can be claimed with a retrospective effect. Reliance was placed on 2005 SCMR 1742. Learned Assistant Advocate General argued that promotions of the appellants were made in accordance with law and rule and no discrimination was made. He further argued that some of the appellants submitted successive appeals, which is violation of Rule 3(2) of Appeal Rules, 1986. Learned Assistant Advocate General prayed that appeals of the appellants being devoid of merit may be dismissed.

07. We have heard learned counsel for the parties and have perused the record.

08. A perusal of record would reveal that all the appellants were employees of the provincial government, who were deputed to serve in Ex-FATA under the control of Director of Education Ex-FATA, whereas their other colleagues working in settled districts were working under the control of Director of Education at provincial level. The provincial Government vide Notification dated 24-07-2014 had issued criteria for promotion of teachers to next grades, which was equally applicable to provincial as well as employees working in Ex-FATA. To this effect, the provincial directorate of Elementary & Secondary Education KP vide letter dated 07-08-2014 had asked the Directorate of Education Ex-FATA to fill in the vacant posts of SST in Ex-FATA by promotion of in-service teachers under the existing service rules. The said letter lingered in the Directorate of Ex-FATA for almost seven months, which finally was conveyed to all Agency Education Officers vide letter dated 09-03-2015 with directions to submit category wise lists of candidates for promotion against the post of SST. Agency Education Officers took another two years and seven months, while submitting such information to the directorate of Ex-FATA and finally the appellants


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Ex-FATA

were promoted vide order dated 11-10-2017. On the other hand, the office of the District Education Officer in the settled district took timely steps and the promotions were made possible in the same year i.e. 2014. Placed on record is a Notification dated 01-11-2014 issued by District Education Officer Charsada, whereby promotions had been made in pursuance of the Notification dated 24-07-2014 in the same year, whereas promotions in Ex-FATA were made in 2017 with delay of more than three years. Placed on record is another Notification dated 14-03-2017 issued by Directorate of Education Ex-FATA promoting Certified Teachers (CT) (BPS-15) to the post of Senior CT (BPS-16) w.e.f 20-02-2013, negating their own stance that promotions are always made with immediate effect. Similarly placed teachers was extended the benefit of their promotion with retrospective effect, however the respondents are denying the same to the appellants for the reasons best known to them. The material available on the record, would suggest that the appellants were treated with discrimination.

09. The appellants are primarily aggrieved by the inaction of the respondents to the effect that all the appellants were otherwise fit for promotion to the post of SST, but their promotions were delayed due to slackness of the directorate of education, which adversely affected their seniority position as well as suffered financially due to intentional delay in their promotions. The respondents also did not object to the point of their fitness for further promotion at that particular time.

10. We have observed that seniority of the appellants as well as their other counterparts working at Districts level had been maintained at Agency/District level before their promotion to the post of SST, whereas upon promotion to the post of SST, the seniority is maintained at provincial level and the appellants who were promoted in 2017 in comparison to those, who were promoted in 2014, would definitely find place in the bottom of the seniority list maintained at provincial level with dim future prospects of their further promotions, as well as they were kept

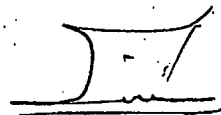
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GENERAL
EDUCATION
PUNJAB

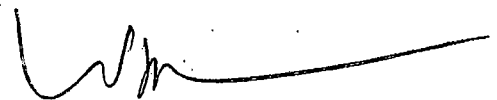
deprived of the financial benefits accrued to them after promotion for no fault of them, hence they were discriminated. It was noted with concern that the only reason for their delayed promotion was slackness on part of directorate of education Ex-FATA and its subordinate offices at Agency level, which had delayed their promotions for more than three years for no fault of the appellants.

11. In view of the foregoing discussion, the instant appeals are accepted and all the appellants are held entitled for promotion from the date, the first batch of their other colleagues at provincial level were promoted in the year 2014 with all consequential benefits. Parties are left to bear their own costs. File be consigned to record room.


ANNOUNCED
14.07.2021



(SALAH-UD-DIN)
MEMBER (JUDICIAL)






(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

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Peshawar

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قیمت 50 روپے	44508	  
ایڈوکیٹ: عبد الرحمن لکھنوی بار کونسل/ایسوسی ایشن نمبر: 10-0611 رابطہ نمبر: 0300-5991598		
پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

بعدالت جناب: سر جس ٹریبلونل لٹلر

مناجب:	دعویٰ:
Appellant	
علیہ خان	علت نمبر:
بنام	مورخہ:
گورنمنٹ وکسپہ	جرم:
	تھانہ:
باعت تحریر آگے	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام لٹلر کیلئے عبد الرحمن لکھنوی ایڈوکیٹ کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

18/10/2022

المرقوم:

المقام _____

Abelur Rehman
 Advocate
 نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Attested &
 Accepted

Abelur Rehman

المقام _____
 علیہ خان ولد لکھنوی ایڈوکیٹ صاحبین کے اختیار سے
 صدر باغ، گلشن ایڈم، ضلع کوٹلی، ایس