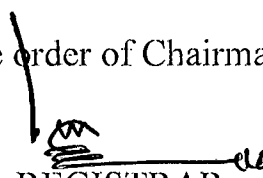


Form- A

## FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 1474/2022

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. Amjid Hussain presented today by Mr. Abdur Rehman Mohmond Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <del>17-10-22</del> Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.

S.A.No. 1474/2022.

AMJAD HUSSAIN----- APPELLANT.

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS.

.....RESPONDENTS

INDEX

S.No	Description of Documents	Annex	Pages
A.	SERVICE APPEAL		
1.	Copies of CNIC is annexure "A	A	7
2.	credentials/ degree-is annexure "A-1 to A-4"	A-1 to A-4	8-11
3.	Copy of first appointment letter Endst: No.1855-91 dated 19.9.1998.	B	12-13
4.	Copy of the Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre Dated 24 <sup>TH</sup> 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.	G	25-30
9.	Adjustment order Endst. No.1190-1232/Edu dated 18.10.2017.	H	31-32
10.	Copy of Notification Peshawar, dated the November 13, 2012.	I	33-36
11.	Copy of Departmental Appeal dated 25.10.2017.	J	37-38
12.	Copy of Reminder application dated 15.01.2018.	K	39
13.	Copy of the Judgment dated 14.07.2021 of this Hon'able Tribunal in appeal No. 1266/2018 and connected appeals.	L	40-48
14.	WAKALATNAMA		49

AD/

Appellant

Through

Abdur Rahman Mohmand Advocate. CELL:03005991598  
Mohmand Law Chamber Charsadda Road Near Faqirabad Police Station

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

**S.A.No. 1474/2022.**

AMJAD HUSSAIN S/O GUL ALI R/O ZERRAN ZORR KALAY  
MEER KALA ROAD BAROTHA COLONY PARA CHINAR 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 28.02.2018 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 24<sup>TH</sup> JULY, 2014 FOR PROMOTION OF Sr.CT/CT TO SST (GENERAL) 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 Bachelor of Arts and Bachelor of Education (B.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) through Endst: No.1855-91 dated 19.9.1998 by the Respondents 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 GISHS Parachinar. (Copy of first appointment letter Endst: No.1855-91 dated 19.9.1998 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 24<sup>TH</sup> 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 24<sup>TH</sup> 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 & 4 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 24<sup>th</sup> July,2014 according to Notification but delay the matter and lastly have ordered other colleagues of the appellant who have same seniority according to seniority list as appellant through letter Endst No.16101-50 dated 11.10.2017 after a long time and again left the Appellant without any promotion, 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.1190-1232/Edu dated 18.10.2017 is annexure "H").
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 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 "J").
11. 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 "K").
12. 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.
13. 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 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 "L")
14. 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 24<sup>th</sup> July,2014, Respondents No.3 did not consider the same from its due date but delayed the process.

- 4
- 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 24<sup>th</sup> 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 24<sup>th</sup> 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 24<sup>th</sup> July, 2014 and as such to equally dealt in accordance with the law and rules.
  - 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 24<sup>th</sup> July, 2014 by convening the meeting of DPC immediately with the other employees of his own district as well of the other districts.***
- (B) That Appellant may kindly be compensated with all back benefits from the date of Notification i.e 24<sup>th</sup> 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 be granted.***

APPELLANT  
THROUGH

ABDUR RAHMAN MOHMAND  
ADVOCATE HIGH COURT  
PESHAWAR.

NOTE:

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

Advocate.

5

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

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

AMJAD HUSSAIN **VERSUS** GOVERNMENT OF KHYBER  
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY AND  
SECONDARY EDUCATION PESHAWAR AND OTHERS.

**AFFIDAVIT:**

I, AMJAD HUSSAIN S/O GUL ALI R/O ZERRAN ZORR KALAY MEER  
KALA ROAD BAROTHA COLONY PARA CHINAR 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**

15 OCT 2022

ATTESTED



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

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

**AMJAD HUSSAIN VERSUS GOVERNMENT OF KHYBER  
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY AND  
SECONDARY EDUCATION PESHAWAR AND OTHERS.**

**ADDRESSES OF THE PARTIES:**

**APPELLANT:**

AMJAD HUSSAIN S/O GUL ALI R/O ZERRAN ZORR KALAY MEER  
KALA ROAD BAROTHA COLONY PARA CHINAR 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.**

**AMJAD HUSSAIN      *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 appellant 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.

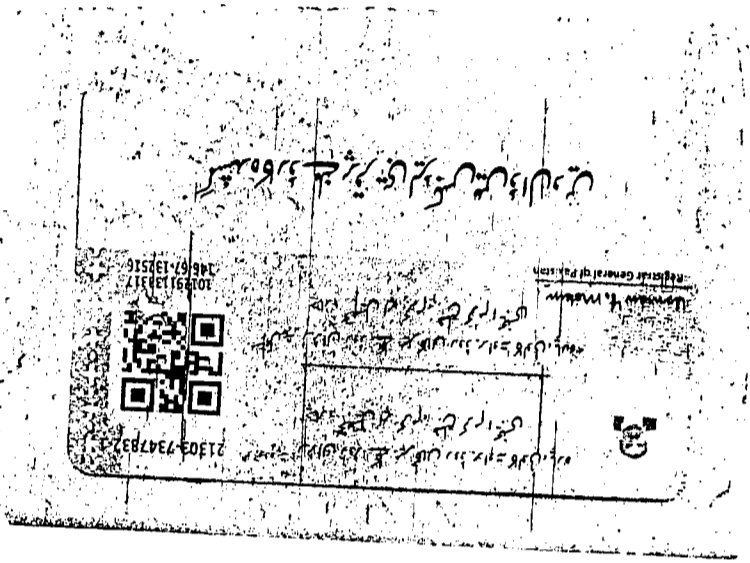
***It is therefore requested that on acceptance of this petition the above titled appeal may kindly be condoned in the best interest of justice.***

  
Appellant

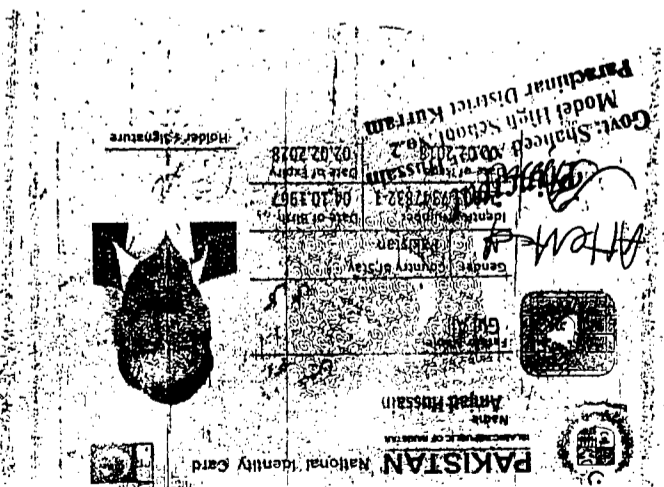
Through

  
**Abdur Rahman Mohmand**  
Advocate High Court  
Peshawar.

ATTE D



ATTESTED



# University of Karachi

کراچی یونیورسٹی



FACTULTY OF SCIENCE

Faculty of Science

whereas

AMAD HUSSAIN

S/O

GUL ALI

has pursued a course of study prescribed by this University for the Degree of Master of Science in PHYSICS having been placed in SECOND class. It is hereby certified that he/she has been duly admitted to the degree of Master of Science in this University.

the requisite examination, held in 1993

in the Faculty of Science and has passed

Master of Science in PHYSICS

by this University for the Degree of

Master of Science in this University.

Head of Office - Chancellor

Registrar

Dated Karachi, the 18TH AUGUST 1994

AH 01/24

Govt. Secy

AMAD HUSSAIN  
S/O  
GUL ALI

ATTESTED

(Signature)

چانسلر

19 9 2

کراچی یونیورسٹی

قراچی یونیورسٹی کے رجسٹرار کے پاس  
اپنا تصدیقی ضابطہ پیش کیا گیا ہے جس میں  
درج ذیل تفصیلات درج ہیں۔  
اس میں 1993 میں  
اساتذہ کرام کے ذریعے فراہم کیے گئے  
جسٹریفیکیشن کے مطابق

(Signature)

ایم۔ اے۔ سی

Roll No. 1-6120531

39691

نمبر شمار

All India Open University  
Rural Deptt



علامہ اقبال ان اوپن یونیورسٹی

AMJAD HUSSAIN

99-AKA-0009

Regn. No.

امجد حسین

رہنوش نبر

GUL ALI

گل علی

بن / بنت

son/daughter of

having completed the prescribed requirements

بھارت میں مطلوبہ شرائط تکمیل کر کے

thereby being entitled to be awarded the degree of

کے

Bachelor of Education

بی۔ ایڈ

ATTESTED

(Signature)

He/She secured 60 % marks and was placed

60 فیصد نمبر لے کر بی۔ ایڈ کی ڈگری حاصل کی۔

in B grade.

Vice Chancellor

وائس چانسلر

Jalambad

Dated: 22ND DEC. 2000

Controller of Examinations

کنٹرولر امتحانات

This degree is to be read in conjunction with the Transcript, issued separately.

Govt. Shabeed Abrar Hussain Model High School No.2  
Parsipur District Kurram

(Signature)

تاریخ 22 دسمبر 2000

مقام

(Signature)

Amol 'A2'

# EDUCATION DEPARTMENT, N.-W.F.P., PESHAWAR,



## CERTIFICATE OF TEACHING.

ROLL NO. 2496 ✓

Marks obtained 550/1200 /1000

Division Second ✓

Certified that Amjid Hussain ✓

born on 4-10-1967 ✓ (Fourth October Nineteen hundred and Sixty Seven)

Son/Daughter of Gul Ali ✓

resident of xxx Tehsil Parachinar District Kurram Agency

having passed the Certificate of Teaching Examination held in 19<sup>95</sup>, is qualified to teach in the Middle Department of an Angle-Vernacular School.

Trained at the Government Training School, Private

ATTESTED

Attested

*Principal*  
Govt. Shahheed Ahyar Hussain  
Model High School No.2  
Parachinar District Kurram

10  
Amd 'A3'

Dated Peshawar,  
The 25-5-96

VERIFIED

*M. J. Anwar*  
Registrar,  
Departmental Examinations,  
Education Department, Peshawar.

By: Registrar

*Handwritten signature*

No 1300 /AG, dated Parachinar the 21/8 /1983.

Office of the Political Agent, Kurram

Domicile Certificate

Certified that Mr Anjad Hussain  
son of Bul Ali belongs to recognised tribe of  
Shia Dangarh Section Hassan Zai Sub Section Garama Khel  
and his father is/was a permanent bonafide resident of village  
Tan Kurram Agency.

He is an eligible candidate to ~~XXX~~ avail himself  
of the seats reserved for the Tribal Areas of Kohat Division, Kohat  
Backward Areas Kurram Agency.

S. Anwar Ali Shah  
(S. Anwar Ali Shah)  
T.M. Kurram

Sarwar Jan  
(Sarwar Jan)  
A.P.A. UK

Sangi Harjan Khan  
(Sangi Harjan Khan)  
Political Agent, Kurram

25/16/8/83

Office Seal

No 140  
18.8.83

Attested  
Muhammad  
Principal  
Govt. Shauheed Abrar Hussain  
Model High School No.2  
Parachinar District Kurram

R  
ATTESTED



17 Annex 'B'

OFFICE OF THE REGIONAL DIRECTOR OF EDUCATION FATA KOHAT

APPOINTMENT.

Consequent upon the approval of the Departmental Selection Committee, the following CT (Trained) Candidates are Temporarily appointed/Adjusted on Rs. 1605/-PM in BPS-9 and Rs. 2065/-PM in BPS No. 14 for those who are B.A/B.Sc in 2nd Division or on their own Pay and BPS (in case of serving personnel, which ever is beneficial to them) plus usual Allowances as admissible under the Rules with effect from the dates of their taking over charge in the School noted against their names :-

Sr / Merit No.	Name of Candidate with Father Name With Home Address.	School where Appointed	Remarks
1/1.	Ihsanullah S/O Habibullah of Sara Gala (U.K)	GMS Daradar	Against Vacant Post.
2/2.	Sabir Hussain S/O Ali Hussain of Malana (U.K)	"Kharlachi	- do -
3/4.	Ali Majan S/O Noor Alam Khan of Malana(U.K)	" Kimal Baza	" Newly created Post
4/5.	Guhar Ali S/O Manzar Ali of Boorki(U.K)	GMS Chuzgarhi	Against Vacant Posts
5/6.	Umar Gul S/O Juma Gul of Sada (L.K)	" Dadama	- do -
6/7.	Abdullah Khan S/O Sadin Khan of Makhizai (L.K)	" Beyamina	- do -
7/8.	S.Mohammad Hussain S/O S.Ali Hussain of Shingak(U.K)	GMS Chuz Garhi	- do -
8/9.	Safeer Alam S/O Mir Alam Jun of Ali Zai (L.K)	GMS Bilyameena	- do -
9/11.	Doost Ali S/O Yousaf Ali of Pewar (U.K)	GMS Ghuz Garhi	- do -(SSC requir -ed).
10/12.	Ashiq Hussain S/O Sardar Hussain of Amalkoot(L/K)	GMS Minatoo	Against Vacat Post
11/13.	S.Amin Hussain S/O Sayed Abbass of Koobad Shah Khel.(U.K)	GMS Kimal Baza	" Newly created Post.
12/14.	Fazalur Rehman S/O Nawaz Khan of Sada (L.K)	GMS Badama	Against vacant post.
13/16.	Nijat Ali S/O Mardan Ali of Malana (U.K)	GMS Khazina	Against newly created post.
14/18.	Naib Ali S/O Sher Ali of Ali zai (L.K).	GMS Shakar dara	Against vacant Post.
15/19.	Khadim Nabi S/O Ali Nabi of Ziran(U.K)	GMS. Khazina	Against newly created post.
16/21.	Jalal Mohammad S/O Noor Mohammad of Makhizai (L.K).	GMS Dogar	Against vacant post.
17/23.	Ashiq Hussain S/O Mohammad Nazir of Karman (U.K)	GMS Angoori	- do -
18/24.	Rauf Hussain S/O Sarwar Hussain of Shalozan(U.K)	GMS Boghdai	- do-(SSC require
19/25.	Mohammad Israfeel S/O Muzafar Khan of Makhazai (L.K).	GMS Dogar	Against vacant post.
20/26.	Anjad Hussain S/O Gul Ali of Ziran(U.K)	GMS Sanda Garhi	Against newly created post.
21/27.	Dildar Hussain S/O Ahmed Ali of Ziran (U.K).	GMS Sanda Garhi	- do -
22/28.	S.Mubarak Shah S/O Madir Shah of Parachinar (U.K)	GMS Tarimangal	Against vacant Post.
23/29.	Asimud Din S/O Abdul Karim of Angoori (FR A)	GMS Angoori	- do

*Amended*

*[Signature]*

HEAD MASTER  
G.H.S Nastikot  
Kurram Agency

ATTESTED

P.....2

- Mohammed Alam Jan S/O Hoor Ali GHS Angoori Against vacant Posts.  
of Ziran (U.K)
- 31. Aurangzib S/O Sayed Akbar CMS Minatoo - do -  
of Sakhi Ahmed Shah (L.K)
- 32. Imtiaz Hussain S/O Inayat Hussain CMS Boghdai - do -  
of Luqman Khel (U.K)
- 27/33. Zulficar Ali Shah S/O S.Yakha Shah GHS Tarimangal - do -  
of Shalozan (U.K)
- 28/34. Iqbal Hussain S/O Sardar Hussain CMS Shakar Dara - do -  
of Boorki (U.K)

TERMS & CONDITIONS: N.B. The candidates at M.No. 3,10,15,17,20 &22 are O/Agc.

1. Charge report should be submitted in duplicate to all concerned.
2. The appointment are made purely on temporary basis & liable to termination at any time without assigning any reason/notice. If the candidate wants to resign he will have to give one month prior notice of forefight one month's full pay in lieu thereof.
3. They will not be entitled to get pay unless their Domiciles/National Identity Card and their academic professional qualifications are got verified from the concerned Official/Institutions for which the DDO's will be responsible.
4. NO TA/DA & Transfer Grant is allowed to any one.
5. They should produce their Health & Age Certificate from M/S , Agency Surgeon concerned.
6. The pay scale & Service rules should be subject to the revision in accordance with the orders to be passed by the Govt; of NWFP from time to time.
7. They should not be handed over charge if their Age exceeds 35 Years or is less then 18 Years except those who have rendered Govt;/Afghar Refugees Services OR entitled for relaxation equal to their service Period upto the Maximum of 10 Years.
8. If they failed to take over Charge within Fifteen days their appointment will be automatically be considered as cancelled.
9. No candidate be handed over charge of the post of leave vacancy, if conveyed arronously vacant by the AEO concerned. Such cases the immediately detected and conveyed through special messenger in such cases, the services the last dates will be terminated by the affectee's concerne

(MOHAMMAD ROSHAN KHAN)  
REGIONAL DIRECTOR OF  
EDUCATION FATA KOHAT.

Endst No. 1655-91 Dated Kohat 19/9/99.

Copy to the :-

1. Director of Education FATA NWFP Peshawan.
2. Agency Education Officer Kurram Agency.
3. Principal/Headmaster Concerned.
4. Candidate concerned.

REGIONAL DIRECTOR OF  
EDUCATION FATA KOHAT.

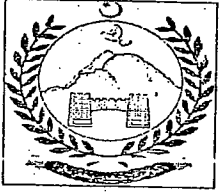
HEAD MA  
GHS Na  
Kurram A

ATTESTED



14

Ann - C



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> 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.  <b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

ATTESTED

(1)

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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**ATTESTED**

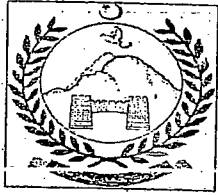
(2)

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>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 25 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>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>

ATTESTED

17



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> 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.  <b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

ATTESTED

(1)

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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*[Signature]*  
**ATTESTED** (2)

ATA of B - P  
SLV PA

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(19)

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.  
*S.P.S.I./P.S.I.*

Memo:

In continuation of this Directorate letter No. 4874 dated 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  
*7/8/14*

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

*7/8/14*  
*7/8/14*

*7/8/14*  
**ATTESTED**

**ATTESTED**

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) HANGU  
Phone # 0925-621083

**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:10000-800-34000) 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"

**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	Muhammad Raham Jan. CT	GMS Serc 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 Mila	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 Naryab	GHS Naryab	-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 Thall	-do-
15	Muhammad Karim SCT	GCMHS No.1 Hangu	GCMHS No.1 Hangu	-do-
16	Khana Din SCT	GHS Dallah	GHS Dallah	-do-
17	Shah Muhammad S	GCMHS No.1 Hangu	GHS Shah Khel	-do-
18	Sajad H	GHS Serozai	GHS Sarozai	-do-
19	Abil B	GHS Togh Sari	GHS Sarozai	-do-
20	Muslim	GHS Shanawori Naryab	GHS Sarozai	-do-
21	Munawar	GHS Chamba Gul	GMS Togh Chapri	-do-

**ATTESTED**

*Attested*

**ATTESTED**

21

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) HANGU

**Better Copy**

**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 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 Lai 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 Mila	GHS, Bilyamina	-do-
9.	Abdul Samand, P.S.T.	GHS No.2 Chapri Naryab	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 Where adjusted	Remarks
1.	Mr. Muhammad Yousaf SCT	GCMHS No.1 Hangu	GCMHS No.1 Hangu	AVP
2.	Noor Sahib Khan CT	GHS Naryab	GHS Naryab	-do-
3.	Azmat Lai CT	GHS Karbogha	GHS Darsamand	-do-
4.	Majeed Gul CT	GHS Kahi	GHS Kahi	-do-
5.	Rehmat Khan CT	GHS Mianji Khle	GMS Qadri Banda	-do-
6.	Muhammad Hilal CT	GHS Serozai	GMS Tari Banda	-do-
7.	Qayum Gul CT	SCT GCMHS No.1, Hangu	GCMHS No.1, Hangu	-do-
8.	Amir Khanan CT.	GHS Karbogha	GHS, Toawari	-do-
9.	Abdul Samand, P.S.T.	GHS Togh Sarai	GHS, Togh Sarai	-do-
10.	Habibi Ali SCT	GHS Ibrahimzai	GHS, Ibrahimzai	-do-
11.	Muhammad Raheem, SCT	GHS Bagoto	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 Thall,	-do-
15.	Muhammad Karim SCT	GCMHS No.1, Hangu	GCMHS No.1, Hangu	-do-
16.	Khana Din SCT,	GHSS Dallan	GHSS Dallan	-do-
17.	Shah Muhammad SCT	GCMHS No.1 Hangu	GHS Shahu khel	-do-
18.	Sajad Hussain SCT,	GHS Serozai	GHS Serozai	-do-
19.	Qabil Bad Shah SCT	GHS TOghsari	GHS Khazina	-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

ATTESTED



Muhammad Riaz SCT	GHS Darshi	GHS Darshi	-do-
Mumtaz Gul SCT	GHS Kahi	GHS Kahi	-do-
Aftab ud Din SCT	GHS Thall	GHS Thall	-do-
Mujeeb ur Rehman SCT	GHS Mianji Khel	GHS Thall	-do-
Habib Gul PST	GHS Gandiri Waziran	GHS Gandiri Waziran	-do-
Fazid Khan PST	GPS Shaikhani Banda	GMS Wach Bazar	-do-
Muazam Ali PST	GPS Ibrahimzai No.1	GHS Ibrahimzai	-do-
Ishfaq Hussain PST	GPS Chapri Hangu	GHS Shahu Khel	-do-
Wali Muhammad Khan PST	GPS Srazmaka No.1	GMS Azimi Banda	-do-
Jamil Ahmad PST	GPS Shanawori Hangu	GHS Shanawori Hangu	-do-
Mr. Muhammad Sadique PST	GPS Jadedi Banda	GMS Sero Khel	-do-
Muhammad Iqbal PST	GPS No.4 Hangu	GHS Shanawori Hangu	-do-
Khalid Mehmood PST	GPS Warasia No.1	GMS Darband	-do-
Rabil Kha Jan PST	GPS Navi Dand	GHS Chapri Waziran	-do-
Hayat Munamirad Khan PST	GPS Shekh Wali Korona	GHS Chapri Waziran	-do-
Muhammad Nauman PST	GPS No.1 Sero Zai	GHS Mamoon Banda	-do-
Musam Gul PST	GPS Chamba Gul	GMS Anar Chma	-do-
Bait Ullah SDM	GHS Bagato	GHS Bagato	-do-
Awal Noor Khan SDM	GHSS Dallon	GHS Mamoon Banda	-do-
Saif ur Rehman SDM	GHS Muhammad Khawaja	GHS Muhammad Khawaja	-do-
Nazir Ullah SAT	GHS Muhammad Khawaja	GHS Kotki Bala	-do-
Mr. Hidayat Ullah SAT	GCMHS No.1 Hangu	GMS Barh Abas Khel	-do-
Mr. Abdur Rehman SAT	GHS No.2 Hangu	GHS No.2 Hangu	-do-
Salih Din STT	GCMHS No.1 Hangu	GMS Samana	-do-
Bakhtiar Ahmad Shakir TT	GMS Shamal Din	GMS Torawori	-do-
Ijaz Ahmad TT	GCMHS No.1	GHS No.2 Hangu	-do-
Abdur Rehman Qari	GHSS Doaba	GHSS Doaba	-do-
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 proceeded 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 TA/DA 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

23. Muhammad Riaz SCT,	GHS Darshi	GHS Darshi	-do-
24. Mumtaz Gul SCT,	GHS Kahi	GHS Kahi	-do-
24. Attab 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. Ishfq 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 TA/DA 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 file.

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*  
**ATTESTED**

24

(188)

Annex - "OF"



Jhangir

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

NO. 2582-2601  
DATED 9-3-15  
E-6 IIP 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 Ist 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.

*(Signature)*  
**ATTESTED**

*(Signature)*  
**ATTESTED**

*(Signature)*  
Deputy Directress (Estab)  
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**ATTESTED**

25 Ann "G"

Kurram SST (M) ③



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 24<sup>th</sup> 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 BPS-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)	24
25% share initial recruitment	6
75% share for Promotion.	18
40% Share of promotion of Senior CT/CT	9
Posts available for promotion	9
Promoted through this order	8

S.N o.	Sl:No o.	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular CT	Qualification	Remarks
1	56	Muhammad	GHS Kunj Ali Zai	13/3/1966	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 Urd 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 Shingak	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	23/3/1968	1/2/2001	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
6	189	Muham. Khan	GHS Pesar	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	2/2005	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
8	223	Muhan Hanif	Kemal	13/1/2009		MSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

**2. PROMOTION OF ST/ST (Bio/Chem) BPS-16.**

Total No. of SST vacant post	24
25% share initial recruitment	6
75% share for Promotion	18
40% Share of promotion of Senior CT/CT	5
Posts available for promotion	5
Promoted through this order	3

S.N o.	Sl:No.	Name of Official	Place of posting	D. Birth	Date of appoint; regular PST	qualification	Remarks
1	76	S.Amwar 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 khe	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/TT 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/TT	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 Appoint: as Regular DM	Qualification	Remarks
1	164	S.Ahmad Shah	GHS Qubadshakhe	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 Appoint: as Regular Qari	Qualification	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	S.L No	Name of Officials	Place of posting	D/O Birth	Date of Appoint; regular CT	Qualification	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 Luqmanke	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 posting 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.

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6	106	Amjad Hussain	GISHS 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 tikot	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 o.	Sl:N o.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular PST	Qualif- cation	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 o.	Sl:N o.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular TT	Qualif- cation	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: us 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	11/11/1957	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.

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

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

S.No	S.I. No	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular PST	Qualification	Remarks
1	15	Muhd Yaqoob Khan	GPS Khapyang	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/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
3	25	Irshad Hussain	GPS Alamkhel	6/4/1967	17/9/1987	MA/M.Ed	Services placed at the disposal of AEO Kurram 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 Kurram 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 Kurram 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 Kurram 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 Kurram for further posting against SST General (BPS-16) post.
8	52	Muhammad Ibrahim	GPS No-2 Parachina	29/1/1971	4/3/1992	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.

### 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	Qualifi-cation	Remarks
1	1	Alee. Khan	GHS Kirman	24/12/1957	19/10/1978	MA/B.Ed	Services placed at the disposal of AEO Kurram 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 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	Qualifi-cation	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 Kurram 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 TT	Qualification	Remarks
1	51	Arbab Hussain	GISHS 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) post.

### 5. PROMOTION OF S.Qari/Qari 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 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 TT	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 TADA 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

Endst: No. 16101-50

Dated Peshawar the 11/10/2017.

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

ATTESTED



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Amal - H

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. 16101-50 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 :-

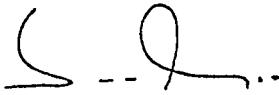
S #	Name of Teacher/Designation	Existing School	Place of Adjustment
1	Mr, Muhammad C.T	GHS Kunj Alizai	GHS Kunj Alizai against vacant post
2	S.Hussain Akbar Shah C.T	GHS Kirman	GHS Kirman against vacant post
3	Mr, Cohar Ali C.T	GHS Shingak	GHS Burki against vacant post
4	Mr, Ashiq Hussain C.T	GMS Parachinar	G.I.S.H.S Parachinar against vacant post
5	Mr, Muhammad Khan C.T	GHS Pewar	GHS Pewar 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 Jamal	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 Ali T.T	GHS Pewar	GHS Pewar 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	GHS 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	GHS 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 Abdullah 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, Mul. ad Ibrahim PST	GPS No.2 Parachinar	GMS Kachkina against vacant post
39	Mr, Alin M	GHS Kirman	GMS Shakardara against vacant post
40	S.Nabi Hussain	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 L.M	GHS Pewar	GHS Shingak against vacant post
43	Mr, Gulfam Hussain T.T	GHS Kirman	GHS Zeran against vacant post

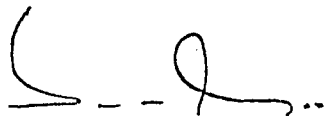
  
Agency Education Officer  
Kurram Agency Parachinar

Endst No 1190-1234 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.

  
**ATTESTED**

  
Agency Education Officer  
Kurram Agency Parachinar

Annex - I

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/4-5/SSRC/Meeting/2012/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 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.

Encl. No. & Date as above.

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

Copy forwarded to:-

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

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Handwritten signature and stamp: (APTA) ... 03159159555 ...

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- 10. The Director Curriculum & Teachers Education Abbottabad.
- 11. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 12. The Director ESRU, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 13. The Deputy Director Database (E&S) E&SE Department.
- 14. All District Coordination Officers in Khyber Pakhtunkhwa.
- 15. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
- 16. All Agency Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers, FATA.
- 17. P.S to Governor, Khyber Pakhtunkhwa.
- 18. P.S to Chief Minister, Khyber Pakhtunkhwa.
- 19. P.S to Chief Secretary, Khyber Pakhtunkhwa.
- 20. P.S to Minister E&SE Khyber Pakhtunkhwa Peshawar.
- 21. Master file.

Section Officer (Primary)

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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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4% PET

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			(iv) one per cent from amongst 1 Instructional Material Specialis with atleast five years service such and having qualificati mentioned in column No. 3; and
			(v) one per cent from amongst 1 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.
			By promotion, on the basis of seniority-cui fitness, from amongst Arabic Teachers, with least five years service as such and havi qualification as prescribed for init recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16)		By promotion, on the basis of seniority-cui fitness, from amongst Theology Teachers, wi at least five years service as such and havi qualification as prescribed for initial recruitme of Theology Teacher.
4.	Senior Certified Teacher (SCT) (General) (BPS-16)		By promotion, on the basis of seniority-cui fitness, from amongst Certified Teache (General), with at least five years service as su and having qualification as prescribed for initi recruitment of Certified Teacher (General).

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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 24<sup>TH</sup> 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 Certified Teacher (CT) through Endst: No.1855-91 dated 19.9.1998 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 GISHS 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 24<sup>TH</sup> 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 Khy. 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, 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 24<sup>th</sup> July, 2014 according to Notification and

  
**ATTESTE**



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 24<sup>th</sup> 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 24<sup>th</sup> July,2014 and any other relief not specifically prayed and to which the Appellant is found entitled may also be granted.*

DATED:25-10-2017

*AMJAD HUSSAIN*  
APPELLANT

AMJAD HUSSAIN S/O GUL ALI R/O ZERRAN ZORR KALAY  
MEER KALA ROAD BAROTHA COLONY PARA CHINAR  
TEHSIL UPPER KURRAM DISTRICT KURRAM

*(Signature)*  
**ATTESTED**

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 24<sup>TH</sup> 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 24<sup>th</sup> July,2014 because your August office has not observed the applicant promotion from his due date i.e 24<sup>th</sup> 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

*Amjad Hussain*  
AMJAD HUSSAIN S/O GUL ALI R/O E AN ZORR  
KALAY MEER KALA ROAD BAROTH C ONY  
CHINAR TEHSIL UPPER KURRAM I ST KURRAM  
P

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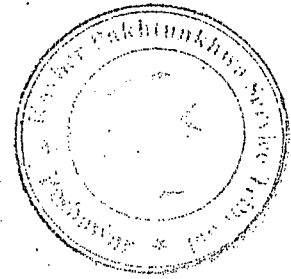
Amal "L"

**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 ...

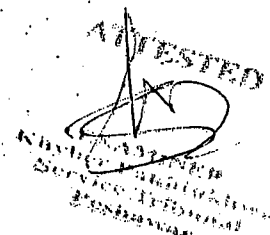
MEMBER (JUDICIAL)  
MEMBER (EXECUTIVE)

**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",

**ATTESTED**



- 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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SECRETARY  
SECRETARIAT  
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) Kista Sher Versus Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others".

  
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SECRETARIAT  
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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SECRETARY  
CIVIL SECRETARIAT  
PESHAWAR

- 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 promoted in 2014.

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TESTED  
 [Signature]  
 CHIEF SECRETARY  
 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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**ATTESTED**  
  
MEMBER  
Tribunal



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.

*Wm*

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 20-07-2014 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 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

*Wm*  
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 Director of Education  
 Ex-FATA

*Wm*  
**ATTESTED**

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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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)**

Date of Presentation of Application 4-1-22

Number of Copies 3600

Cost 38/-

Stamp 38/-

Date of Delivery of Copy 5-1-22

Date of Delivery of Copy 5-1-22

Certified to be true copy




FC MEMBER

Khyber Pakhtunkhwa

Service Tribunal

Peshawar

ATTES TO

قیمت 50 روپے	44510			
ایڈویکٹ: عبدالرحمن محمد		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: 10-0611		بجائے جناب: سر س شریونی لال		
رابطہ نمبر: 0300-5991548				

مخانب:	Appellant
دعویٰ:	
علت نمبر:	
مورخہ:	
جرم:	
تھانہ:	

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام کیسٹیکل عدلہ عبدالرحمن محمد کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی 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 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو کوئی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا سناختہ پر داخیت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جاتہ اتوائے 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

12/10/2022  
PESHAWAR BAR ASSOCIATION  
KHYBER PAKHTUNKHWA

المقام: پشاور

Abelur Rehman Michmand Attested  
Accepted

نوٹ: اس وکالت نامہ کی نوک کاپی ناقابل قبول ہوگی۔

ایک کسٹیکل عدلہ علی صاحبین ذیل ان ذیل کے حکم سے حکم دیا گیا ہے  
 جس نے، کسٹیکل عدلہ علی صاحبین ذیل ان ذیل کے حکم سے حکم دیا گیا ہے