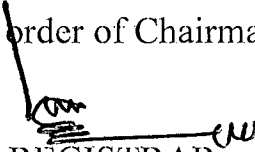


Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1475/2022

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. Amanullah Jan presented today by Mr. Abdur Rehman Mohmond Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>17-10-22</u> 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. 1475 /2022.

AMAN ULLAH JAN----- APPELLANT.

**VERSUS**

GOVERNMENT OF KHYBER PAKHTUNKHWA & OTHERS.

.....RESPONDENTS

**INDEX**

S.No	Description of Documents	Annex	Pages
A.	SERVICE APPEAL		
1.	Copy of CNIC	A	8
2.	Copy of credentials/ degree	A-1 to A-4	4-12
3.	Copy of first appointment letter Endst:No.634-59 dated 10.10.1994.	B	13-14
4.	Copy of the Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre Dated 24 <sup>TH</sup> July, 2014.	C	15-19
5.	Copy of the letter No.4954 dated 07.08.2014 of Respondent No.2 department.	D	20
6.	Copy of the said Notification Endst No. 3493-3562 dated 31.10.2014.	E	21-24
7.	Copy of letter No.2602-3 dated 09.03.2015 of the Respondent No.3.	F	25
8.	Copy of promotion order/letter Endst: No.16101-50 dated 11.10.2017 of Respondent No.3 is annexure "G"	G	26-31
9.	Copy of adjustment order Endst. No.1190-12321 Edu dated 18.10.2017.	H	32-33
10.	Copy of Notification Peshawar, dated the November 13, 2012.	I	34-37
11.	Copy of the promotion order from SPSTs BPS-14 to PSHTs BPS-15 Notification Endst. No.108-11 dated 11.01.2017	J	38-40
13.	Copy of Departmental Appeal dated 19.03.2018.	K	41-42
14.	Copy of Reminder application dated 18.04.2018.	L	43
15.	Copy of the Judgment dated 14.07.2021 of this Hon'able Tribunal in appeal No. 1266/2018 and connected appeals.	M	44-52
16.	WAKALATNAMA		53

*Amam ullah*  
Appellant

Through

*Rahman Mohmand*

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. 1475/2022.

AMAN ULLAH JAN S/O MIR ABDULLAH JAN R/O IMAMIA  
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 11.10.2017 OF RESPONDENT NO.3 FOR NON OBSERVANCE OF PROMOTION/SENIORITY ORDER OF THE APPELLANT, FROM THE DATE OF NOTIFICATION NO.SO(PE)/4-5/SSRC/MEETING/2013/TEACHING CADRE DATED 24<sup>TH</sup> JULY, 2014 FOR PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-16, PASSED BY THE GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION BASED ON DISCRIMINATION, VIOLATION OF FUNDAMENTAL RIGHT AND AGAINST KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER RULES, 1989).**

.....  
**RESPECTFULLY SHEWETH!**

1. That the Appellant is a naturally born law abiding citizen of the Islamic Republic of Pakistan and is qualified up to master of Arts and Master of Education (M.ED).(Copies of CNIC is annexure "A" and credentials/ degree is annexure "A-1 to A-4").
2. That the Appellant was appointed as Primary School Teacher (PST) on dated 10.10.1994 through Endst:No.634-59 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 GPS Shani Sehra District Kurram at Parachinar. (Copy of first appointment letter Endst:No.634-59 dated 10.10.1994 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 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 process and lastly have passed his promotion ordered through letter Endst: No.16101-50 dated 11.10.2017 after a long time, hence appellant has not been treated in accordance with law, and appellant rights secured and guaranteed under the law and constitution have been violated.(Copy of promotion order/letter Endst: No.16101-50 dated 11.10.2017 of Respondent No.3 is annexure "G" while adjustment order Endst. No.1190-12321 Edu dated 18.10.2017 is annexure "H")

9. That this order of Respondent No.3 has affected the Seniority/promotion of the Appellant because the Seniority of the SST teachers in Khyber Pakhtunkhwa and EX-FATA(Merged District) are the same and not considering the appellant from the due date adversely affect the appellant right for seniority in Subject Specialist (SS) posts in Higher Secondary School as well as Headmasters in High Schools which is clear violation of fundamental rights of Appellant and against Notification Peshawar, dated the November 13, 2012. (Copy of Notification Peshawar, dated the November 13, 2012 is annexure "I").
10. That the appellant time and again visited/requested the respondents to follow the said rules but all in vain. It is pertinent to mention here that the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department through Notification Endst. No.108-11 dated 11.01.2017 has promoted the appellant from spst bps 14 to the post of PSHTs BPS 15 with effect from 01.07.2012 . (Copy of the promotion order Notification Endst. No.108-11 dated 11.01.2017 is annexure "J")
11. That even after promotion of other colleagues of appellant, the Respondent No.3 has not observed the appellant promotion from his due date i.e 24<sup>th</sup> July,2014 according to Notification but delay the matter and lastly has ordered the promotion of the Appellant through letter Endst: No.16101-50 dated 11.10.2017 after a long time and adjustment letter No.719-24/Edu dated 15.03.2017 was issued.
12. That feeling aggrieved from the order dated 11.10.2017, the Appellant filed Departmental Appeal on dated 25.10.2017, before Respondent No.2.(Copy of Departmental Appeal dated 25.10.2017 is annexure "K").
13. That the Appellant frequently visited the office of Respondent No.3 for consideration of his departmental appeal but the official Authority delayed the matter and wants some more time for consideration, for which the appellant sent another reminder for consideration of departmental appeal on dated 15.01.2018.(Copy of Reminder application dated 15.01.2018 is annexure "L").
14. That the Appellant was informed that his departmental Appeal is under consideration and will be discussed with Respondents No. 2, but again respondents No.3 delayed the matter and lastly the appellant was informed that their other colleagues have filed their promotion appeals and he will also be treated when those appeals were finally decided.
15. That the appeals of other colleagues of the Appellant were finally decided by this Hon'able Tribunal on dated 14.07.2021 where all the appeals were accepted and the appellants in those appeals were held entitled for promotion from the date, the first batch of 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 "M")

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

**GROUND:-**

- 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.
- 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 through 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

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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 like other employees of his own district as well of the other districts.**
- (B) That appellant may kindly be compensate with all back benefits from the date of Notification i.e 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 also be granted.**

*Amer ullah*  
APPELLANT

THROUGH

*Abdur Rahman Mohmand*  
ABDUR RAHMAN MOHMAND  
ADVOCATE HIGH COURT  
PESHAWAR.

**NOTE:**

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

*Abdur Rahman Mohmand*  
Advocate.

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

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

AMAN ULLAH JAN       **VERSUS**       GOVERNMENT OF  
KHYBER       PAKHTUNKHWA       THROUGH       SECRETARY  
ELEMENTARY AND SECONDARY EDUCATION PESHAWAR  
AND OTHERS.

**AFFIDAVIT:**

I, AMAN ULLAH JAN S/O MIR ABDULLAH JAN R/O IMAMIA  
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.

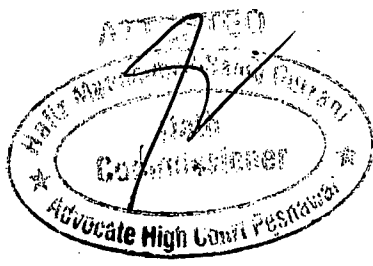
*Rev. Rahman Mohmand*

**Identified By Advocate**

*Aman Ullah*  
**DEPONENT**

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

13 OCT 2022





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

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

AMAN ULLAH JAN **VERSUS** GOVERNMENT OF KHYBER  
PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY  
AND SECONDARY EDUCATION PESHAWAR AND OTHERS.

**ADDRESSES OF THE PARTIES:**

**APPELLANT:**

AMAN ULLAH JAN S/O MIR ABDULLAH JAN R/O IMAMIA  
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

*Aman Ullah*  
APPELLANT

THROUGH

*Abdur Rahman Mohmand*

ABDUR RAHMAN MOHMAND  
ADVOCATE HIGH COURT PESHAWAR.

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

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

AMAN ULLAH JAN **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 favors adjudication of cases on merit rather on technicalities.
5. That there is no legal bar or acceptance of this petition.

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

Through

*Amamullah.*  
Appellant

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



Serial

No 014094

9

Annex "A1"

Roll No. 3301/N/2000

S

# UNIVERSITY OF SINDH



## MASTER OF ARTS

2000

This is to certify that SHANULLAH TAN S/O MIR ABDULLAH JAW.....

..... having been examined in 2000  
was found qualified for the Degree of Master of Arts in POLITICAL SC

Class: Second

Date of declaration of result 31.03.2001

*S. Ahmed*  
Controller of Examinations,  
University of Sindh

*A.B. Arif*  
Registrar,  
University of Sindh

*Mir*  
Vice-Chancellor,  
University of Sindh

Jamshoro Sindh (Pakistan) Dated 9th Feb. 2005.

Attested

ATTESTED

*Q. J. Khan*  
Assistant Agency Education  
Officer Kurram Parachinar

10 Annex "A2"

# Allama Iqbal Open University Islamabad



Serial No. 37937

Certified that Mr. / Ms. **AMAN ALLAH JAN**

Son / Daughter of **MIR ABDULLAH JAN**

Registration No: **11AKM00153** Roll No: **AL651415**

having successfully completed the prescribed requirements  
in semester **AUTUMN 2012** is awarded the degree of

*Master of Education (M. Ed.)*

He / She has secured **67 %** marks and has been placed in **B** grade.

CONTROLLER OF EXAMINATIONS



Attested

VICE-CHANCELLOR

HEAD MASTER  
G.H.S. Yarnon  
Kurram Agency

**ATTESTED**

Result declared on: **August 30, 2013**

Date of Issue: **July 21, 2014**

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

DIRECTORATE OF CURRICULUM & TEACHERS EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR

PRIMARY TEACHING CERTIFICATE (PTC)  
(ORIGINAL CERTIFICATE)

Serial No. 9501

Session 1994

Roll No. 1513

Marks Obtained 760 / 1200

Division Ist

Certified that Mr./Mrs./Miss Aman Iillah Jan

Son/Daughter of Mir Abdullah Jan is a student of

GEC(M) Jaurud

having passed the prescribed P.T.C. Examination held in 1994

is qualified to teach in Primary Schools of Elementary and Secondary Education Department.

Prepared by [Signature]

Checked by [Signature]

Result declaration date 9/1/95

Date of Issue 11/2/2014



Attested  
[Signature]

HEAD MASTER  
G.H.S. Ya  
Kurram Agency

[Signature]  
Assistant Director (Examinations),  
Khyber Pakhtunkhwa, Peshawar.

Amal 'A3'

AAEO  
Upper Kurram

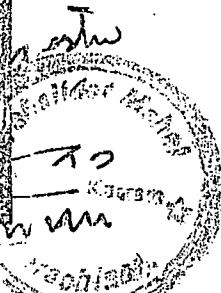
ATTESTED

Amx "A4" 18

NO. 1163 /AG DATED PARACHINAR THE 08/7/02

OFFICE OF THE POLITICAL AGENT KURRAM AGENCY

**DOMICILE CERTIFICATE**



CERTIFIED THAT MR/MRS Aman-u-llah Jan  
SON/DAUGHTER OF MR Mir Abdullah Jan BELONGS TO A  
RECOGNIZED TRIBE OF Bangash SECTION Bangash  
SUB SECTION Bangash AND HIS/HER FATHER IS/WAS A PERMANENT  
BONAFIDE RESIDENT OF VILLAGE Parachinar KURRAM AGENCY

HE/SHE IS AN ELIGIBLE CANDIDATE TO AVAIL HIMSELF/HERSELF OF THE SEAT RESERVED  
FOR TRIBAL AREAS KOHAT DIVISION KOHAT BACKWARD AREA KURRAM AGENCY

T.M. KURRAM/P.T. ALIZAI  
P.N.T. (FR)  
Ma 057/2002

Relh  
ASSISTANT  
POLITICAL AGENT  
Date Political Agent  
5-7-02

POLITICAL AGENT  
KURRAM AGENCY  
Political Agent Kurram

ATTACHED



Attested  
Assistant Agency Education  
Officer Kurram Parachinar

R/Singh Anand

## OFFICE OF THE AGENCY EDUCATION OFFICER KURRAM AGENCY PARACHINAR

APPOINTMENT/TRANSFER

Consequent upon the completion of P.T.C Training during Session 1993-94, the below mentioned appointment/transfer of P.T.C teachers are hereby ordered in the interest of public service with effect from the date of their taking over charge in B.P.S NO.7 (1480-81-2695):- 10-10-1994.

S.No	Name of Candidate/Father's Name	From	To
1.	Wajan Khan S/O Muhammad Jan	Candidate	GPS Sarak F.R against vacant post.
2.	Iaiq Jan S/O Juma Khan	"	GPS Saidali Mela Vice No.3.
3.	Dildar Hussain PTC	GPS Saidali Mela	GPS Mirmai against vacant post.
4.	Qayum Khan S/O Ghafoor Khan	Candidate	GPS Khawo Kali F.R against newly created post.
5.	Muhammad Karim S/O Fazal Rahim	"	GPS Komal Baza F.R against vacant post.
6.	Noor Marjan S/O Ghulam Jan	"	GPS Rego Kali F.R against vacant post.
7.	Jamil Hassan S/O Gul Hassan	"	GPS Sarpakh (Hashim Khan Kali) F.R against newly created post.
8.	Gul Rabi Khan S/O Noor Hassan	"	GPS Gogani F.R against vacant post.
9.	Shahid Rehman S/O Islam Badshah	"	GPS Daya F.R against vacant post.
10.	Muhammad Naqeeb S/O Muhammad Karim	"	GPS Takhtak F.R against vacant post.
11.	S.Mohsin Ali Shah S/O S.Baqir Hussain	"	GPS Sultan against newly created post.
12.	Muhammad Farooq S/O Deen Badshah	"	GPS Narari F.R against vacant post.
13.	Iqbal Hussain S/O Muhammad Noor	"	GPS Salo F.R against vacant post.
14.	Mir Hussein S/O Ali Nabi	"	GPS Khazina F.R against vacant post.
15.	Khalid Hussain S/O Muhammad Younas	"	GPS Dadmir Kali against vacant post.
16.	Habib Ali S/O Sultan Ali	"	GPS Rego Kali against newly created post.
17.	Mohsin Ali S/O Habib Ali	"	GPS Sarpakh No.1 F.R against vacant post.
18.	Muhammad Hanif S/O Haider Ali	"	GPS Machaki Kali against vacant post.
19.	Ikhtiar Hussain S/O Ali Mirza	"	GPS Khani Khel F.R against vacant post.
20.	Abbas Ali S/O Sultan Ali	"	GPS Bazai F.R against newly created post.
21.	Aman Ullah Jan S/O Mir Abdullah Jan	"	GPS Dargai No.1 against vacant post.
22.	Sardar Ali S/O Muhammad Ali	"	GPS Cum Chapper F.R against vacant post.
23.	S.Muneeb Hussain S/O S.Naqeeb Hussain	"	GPS Dar F.R against vacant post. The School is closed down. He will work at G.P.S College Colony till further order.

.....2.....

Attested

M. M. M.  
Principal  
Govt. Sheikhred Abbas Hussain  
Model High School No.2  
Parachinar District Kurram

ATTESTED



.....2.....

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- Note:-
1. The Candidates are directed to produce their health and age certificates from the Medical Supdt Agency HQ Hospital Parachinar.
  2. The age of the candidates should be between 18 to 28 years.
  3. Their appointment are purely made on temporary basis and liable to termination at any time without assigning any notice. In case they wished to resign their post, they will have to give one month prior notice, or forfeit one month pay in lieu thereof.
  4. Charge report in duplicate should be submitted to this office.

*sel - a*  
Agency Education Officer  
Kurram Agency Parachinar

Endst No 634-53/Edu Dated Parachinar the 10/10/94

Copy of the above is forwarded to the:-

- 1-23. Candidates concerned.
24. Accountant Local Office.
25. A.A.E.O Concerned.
26. Office record.

*Ad. min. ed. Parachinar*  
Agency Education Officer  
Kurram Agency Parachinar  
*J. Khan*

*[Signature]*  
**ATTESTED**



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 MA 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 (EPS-16), with at least five years service as such and having qualification mentioned in column No. 3.
				Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

  
**ATTESTED**

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

(2)

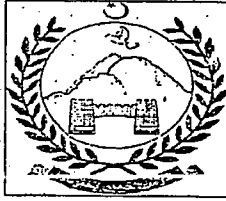
  
**ATTESTED**

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

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

(3)

(★)  
**ATTESTED**



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

(1)

**ATTESTED**

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

(2)

  
**ATTESTED**

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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.  
SPSI/PSI

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.

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

[Signature]

11/11/14

[Signature]

ATTESTED

[Signature]

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.	Muhammd Raham Jan. CT	GMS Sero Khel	GHS Mamoon Banda	-do-
3.	Muhammad Sharif PST.	GPS Gandiri Waziran	GHS Gandir Waziran	-do-
4.	Khial Dar Khan DM.	GCMHS No.1 Hangu	GCMHS No.1 Hangu	-do-

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

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

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

Sr No	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1	Sami ud Din SCT.	GCMHS No.1 Hangu	GCMHS No.1 Hangu	AVP
2	Ashraf Hussain SCT.	GHS 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 Thali	GHS Thali.	-do-
15	Muhammad Karim SCT.	GCMHS No.1 Hangu.	GCMHS No.1 Hangu.	-do-
16	Khana Din SCT.	GHS Dallon	GHS Dallon.	-do-
17	Shah Muhammad SCT.	GCMHS No.1 Hangu	GHS Shahu Khel	-do-
18	Sajad Hussain SCT.	GHS Serozai	GHS Sarozai.	-do-
19	Qabil Bad Shah SCT	GHS Togh Sari	GHS Togh Sari	-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



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**Better Copy**  
**OFFICE OF THE DISTRICT EDUCATION OFFICER**  
**(MALE) HANGU**

**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, Ibrhaimzai	-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*

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

**Terms & Conditions**

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

DISTRICT EDUCATION OFFICER  
(MALE) HANGU

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

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

DISTRICT EDUCATION OFFICER  
(MALE) HANGU

Attested

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23	Muhammad Riiaz SCT,	GHS Darshi	GHS Darshi	-do-
24	Mumtaz Gul SCT,	GHS Kahi	GHS Kahi	-do-
24	Aftab ud Din SCT,	GHS Thall	GHS Thall	-do-
25	Mujeeb ur Rehman SCT,	GHS Mianji khel	GHS Thall	-do-
26	Habib Gul P.S.T,	GHS Gandiri Waziran	GHS Gandiri Waziran	-do-
27	Faaid 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 Jah 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*

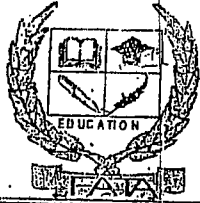
**ATTESTED**

**ATTESTED**

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Amx - 21  
OF



Jahangir

FATA SECRETARIAT I  
DIRECTORATE OF EDUCATION  
KPK, WARSAK ROAD PESHAWAR, PAKISTAN

No. 2587-2601  
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.

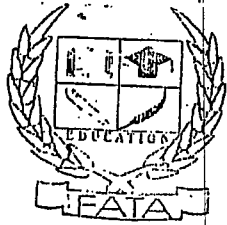
*sd*  
Deputy Directress (Estab)  
54

ATTESTED

ATTESTED

Annex - G 26

Kurram SST (M)



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. 18910-1520-64510) 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.No	Sl.No	Name of Official	Place of posting	D/O Birth	Date of Appoint; regular CT	Qualification	Remarks
1	56	Muhammad	GHS Kunj Ah Zai	25/12/1966	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	GLIS 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	GLIS 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 All	GHS Shinguk	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	1/3/2001	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
6	189	Muhammad Khan	GHS 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	6/12/2005	BSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.
8	223	Muhammad Hanif	GMS Kemal Baza	12/6/1982	13/10/2009	MSc/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Bio/Chem (BPS-16) post.

**2. PROMOTION OF PSHT/SPST/PST 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
44% Share of promotion of PSHT/SPST/PST	5
Posts available for promotion	5
Promoted through this order	3

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

**ATTESTED**



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

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

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

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

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

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

S.No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular Qari	Qualifi- cation	Remarks
1	12	Atta-ud Din	MHS 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/CTs	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 Appott; regular CT	Qualifi- cation	Remarks
1 ✓	60	Sardar Hussain	GHS Zeran	19/3/1968	25/12/1993	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
2	61	Inayat Hussain	GISHS Parachinar	2/4/1968	25/12/1993	BSc/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST Phy/Math (BPS-16) post.
3 ✓	63 ✓	Majeed Hussain	GHS 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.

11/10/12

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

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

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

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

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

**C. SST (General)**

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

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

ATTESTED

S.No	S.I. No	Name of Official	Place of Posting	Date of Birth	Date of Appoint: as Regular CT	Qualification	Remarks
1	7	S.Hussain Afzal	GSNHSS Shalozan	15/7/1962	18/6/1987	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
2	8	Amir Habibullah Khan	GMHS Sadda	20/4/1964	8/7/1987	BA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
3	9	Mehboob Ali	GHS Borki	20/11/1987		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	GHS Alizai	11/11/1967	7/3/1993	MA/B.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.
16	48	S.Kamal Hussain	GHS Mali Kali	25/8/1969	27/4/1993	BA/M.Ed	Services placed at the disposal of AEO Kurram for further posting against SST General (BPS-16) post.

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

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

**ATTESTED**



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	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.L No	Name of Official	Place of Posting	Date of Birth	Date of Appoint: as Regular DM	Qualification	Remarks
1	1	Aleem Khan	GHS Kirman	24/12/1957	19/10/1978	MA/B.Ed	Services placed at the disposal of AEO 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 of SAT/AT	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 AT	Qualification	Remarks
1	23	S.Nabi Hussain	Kurj 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

ATTESTED



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 TA/DA is allowed for joining his duty.
- 6 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 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.

**ATTESTED**

Add: Director (Estab)  
Directorate of Education, FATA



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Annex - 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. 16/01-50 dated 11-10-2017, the following C.T/A.T/D.M/T.T and PST are hereby adjusted against the vacant SST posts in BPS-16 in the schools noted against their names with effect from 18-10-2017 :-

S #	Name of Teacher/Designation	Existing School	Place of Adjustment
1	Mr, Muhammad C.T	GHS Kunj Alizai	GHS Kunj Alizai against vacant post
2	S.Hussain Akbar Shah C.T	GHS Kirman	GHS Kirman against vacant post
3	Mr, Gohar Ali C.T	GHS Shingak	GHS Burki against vacant post
4	Mr, Ashiq Hussain C.T	GMS Parachinar	G.I.S.H.S Parachinar against vacant post
5	Mr, Muhammad Khan C.T	GHS 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 post
16	S.Mubarak Shah C.T	GHS Nastikot	G.S.A.H.M.H.S Parachinar against vacant post
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 post
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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	S.Qabil Hussain D.M	GHS Shalozan	GHS Zeran against vacant post
	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, Muhamad Ibrahim PST	GPS No.2 Parachinar	GMS Kachkina against vacant post
39	Mr, Alim Khan D.M	GHS Kirman	GMS Shakardara against vacant post
40	S.Nabi Hussain, A.T	GHS Kunj Alizai	GMS Kharlachi against vacant post
41	Mr, Arbab Hussain T.T	G.I.S.H.S Parachinar	GHS Nastikot against vacant post
42	Mr, Muhammad Bashir D.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

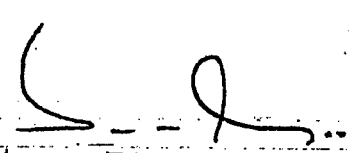
Endst No 1190-1232/Edu

Dated 18/10 /2017

Copy forwarded to the:-

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

  
**ATTESTED**

  
Agency Education Officer  
Kurram Agency Parachinar

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO. PE. 14-5/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.

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

Order No. & Date as above.

Copy forwarded to-

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

ATTESTED

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Annex-I  
Annex-I  
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- 9. The Director Curriculum & Teachers Education Abbottabad.
- 10. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 11. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 12. The Deputy Director Database (EMIS) E&SE Department.
- 13. All District Coordination Officers in Khyber Pakhtunkhwa.
- 14. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
- 15. All District Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers FATA.
- 16. P.S to Governor, Khyber Pakhtunkhwa.
- 17. P.S to Chief Minister, Khyber Pakhtunkhwa.
- 18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
- 19. P.S to Minister E&SE Khyber Pakhtunkhwa.
- 20. P.S to Secretary E&SE Department.
- 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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			<p>(iv) one per cent from amongst Instructional Material Specialists with atleast five years service such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.</p>
3.	Senior Theology Teacher (STT) (B-16)		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.</p>
4.	Senior Certified Teacher (SCT) (General) (BPS-16)		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).</p>

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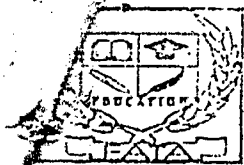
Initial Prom

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Attested

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38

Ann - "J"

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

**NOTIFICATION**

Consequent upon the recommendation of the Departmental Promotion Committee held on 02/12/2016 Endst: No.4958-65/Edu: dated 02/12/2016, Endst: No.5012-20 dated 05/12/2016, Endst: No.5066-74/Edu: dated 06/12/2016, Endst: No.5126-33/Edu: dated 07/12/2016, Endst: No.5172-79/Edu: dated 08/12/2016, Endst: No.5325-32/Edu: dated 09/12/2016, Endst: No.6774-60/Edu: dated 13/12/2016, Endst: No.6809-16/Edu: dated 14/12/2016 & in pursuance of Finance Division Regulation Wing Notification No.F.No.1(32)R-1/2015-251/2015 30<sup>th</sup> May 2016 & Director Education FATA Endst: No.8233-60 dated 08/08/2016, duly signed by S/O Secretariat & Endst: by Director Education FATA Secretariat Peshawar Director Education FATA vide 10267-300 dated 10/10/2016 & in the public interest. The following SPSTs BPS-14 are hereby promoted to the post of PSHTs BPS-15 (Rs 8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy provincial Govt: in teaching cadre w-e-f 01/07/2012.

S#	Name of Teacher & Present place of posting	Posted as	Remarks
1	Ihsan Ali GPS Mardan Ali Kali	GPS Mardan Ali Kali (Retired)	Promoted through DPC
2	S Nabl Hussain GPS Aka Khel	GPS Aka Khel (Retired)	----do----
3	S Ali Shah GPS Qubad Shah Khel	GPS Qubad Shah Khel	----do----
4	Raza Hussain GPS Luqman Khel	GPS Luqman Khel (Retired)	----do----
5	Safar Ali GMS Parachinar	GPS Jabba	----do----
6	Najeeb Ali GPS Malana	GPS Malana (Died)	----do----
7	Mir Hussain GPS Gambeel	GPS Gambeel (Retired)	----do----
8	Tahir Hussain GPS Yousaf Khel	GHS Malana	----do----
9	Sabir Hussain GPS Shakardara	GPS Shakardara (Retired)	----do----
10	S Nazir Hussain GPS Pokhra	GPS Pokhra	----do----
11	S Ali Raza GPS Abdullah Khan Kali	GPS Abdullah Khan Kali	----do----
12	Rahib Ali GPS Mir Alam Sahra	GPS Mir Alam Sahra	----do----
13	Gulzar Hussain GPS Shalozan	GPS Shalozan	----do----
14	Inayat Hussain GPS Shaidani Sahra	GPS Shaidani Sahra (Died)	----do----
15	Asghar Hussain GPS Gambeel	GPS Gambeel	----do----
16	Akbar Hussain GPS Abdullah Khan Kali	GPS Aka Khel	----do----
17	Mohd Ismail GPS Khairadin	GPS Alishari	----do----
18	S Inayat Hussain GPS No.1 Mali Khel	GPS No.1 Mali Khel	----do----
19	Rashid Hussain GPS Boshera No.2	GPS Boshera No.2	----do----
20	Zawar Ali GPS Prath Pewar	GPS Prath Pewar	----do----
21	Sayed Hussain GPS Dago Kali	GPS Dago Kali	----do----
22	Abbas Ghulam GPS Pewar	GPS Pewar	----do----
23	Munir Hassan GPS Zeran	GPS Zeran (Retired)	----do----
24	S Zamin Hussain GPS Qubad Shah Khel	GPS Jilamzo Kot	----do----
25	S Fazal Hussain GPS Korizgai	GPS Korizgai	----do----
26	Bakht Hussain GPS Pish Imam Colony	GPS Pish Imam Colony	----do----
27	Nawab Hussain GPS Bisatoo	GPS Bisatoo (Retired)	----do----
28	Nijat Hussain GPS Balish Khel	GPS Balish Khel	----do----
29	Hamid Hussain GPS Dangila	GPS Dangila	----do----
30	S Jabir Hussain GPS China	GPS China (Retired)	----do----
31	S Mir Athar GMS Parachinar	GPS Parachinar	----do----
32	Mehboob Hussain GPS Dalasa	GPS Dalasa (Retired)	----do----
33	Irshad Hussain GPS Jangal Kali Pewar	GPS Alam Khel	----do----
34	S Asghar Jan GPS Kharadin	GPS Kharadin	----do----
35	Rauf Hussain GPS Sahra Kali	GPS Sahra Kali	----do----
36	Asghar Jan GPS Koshar	GPS Koshar	----do----
37	S Aminul Hassan GPS Matta	GPS Matta (Retired)	----do----
38	Jabir Hussain GPS Pish imam Colony	GPS Pish imam Colony	----do----

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S#	Name of Teacher & Present place of posting	Posted as	Remarks
47	S Mir Arab Shah GPS Mardan Ali Kali	GPS Mardan Ali Kali	----
48	Rashid Ali GPS Sidara	GPS College Colony	----do----
49	Sayed Raza GHS Kirman	GMS Kagawaga	----do----
50	Abid Hussain GMHS Parachinar	GPS Jaro Kali	----do----
51	Niaz Ali GPS Ismail Khel Colony	GHS Boshera	----do----
52	Gui Hussain GHS Shalozan	GPS Noorki	----do----
53	Naib Hussain GPS Kanda Abbas	GPS Kanda Abbas	----do----
54	S Siraj Hussain GPS Taki	GPS Taki	----do----
55	Muhd Ibrahim GPS No.2 Parachinar	GPS No.2 Parachinar	----do----
56	S. Muhd Ali Shah GPS Balish Khel	GPS Topaki	----do----
57	Nazim Hussain GPS Dandar Sahra	GPS Dandar Sahra	----do----
58	S Wazir Hussain GMS Ibrahim Zai	GMS Ibrahim Zai	----do----
59	Muhammad Ayub GHS Ghuzgari	GHS Ghuzgari	----do----
60	Essa Hussain GPS Ghundi Khel Pewar	GPS Noorullah Kali Pewar Tangi	----do----
61	Inam Ali GPS Chapper	GPS Chapper	----do----
62	Iqbal Hussain GPS Badama	GPS Badama	----do----
63	Arbab Ali GMS Bughaki	GMS Bughaki	----do----
64	S Ilyas Hussain GHS Kirman	GHS Kirman	----do----
65	Amin Hussain GPS Karakhela	GPS Karakhela	----do----
66	Iqbal Hussain GHS Shalozan	GPS Larzar Shalozan	----do----
67	Mohsin Ali GHS Nastikot	GHS Nastikot	----do----
68	Aman Ali GPS Mirdad Khel	GPS Mirdad Khel	----do----
69	Abid Ali GPS Parachinar 2	GPS Lalmai	----do----
70	S Ibrar Hussain GPS Shaidani Sahra	GPS Maikai	----do----
71	Sayed Ali Shah GMS Kachkina	GMS Kachkina	----do----
72	S Anwar Hussain GHS Samir	GPS Yaqoobi No.2	----do----
73	Khial Hussain GPS Landi Wan	GPS Landi Wan	----do----
74	S Fida Hussain GPS Gram Kirman	GPS Gram Kirman	----do----
75	Iqbal Hussain GMS Yarda	GMS Yarda	----do----
76	Sardar Ali GPS No 2 Mali Khel	GPS No 2 Mali Khel	----do----
77	Mir Hussain GHS Zeran	GPS Musa Khel	----do----
78	Amanullah Jan GPS Dandar Sahra	GPS Shanai Sahra	----do----
79	Ajeeb Hussain GPS Taki	GPS China	----do----
80	Abbas Ali GHS Mirjamal	GHS Mirjamal	----do----
81	S Inayat Hussain GPS Duravi	GPS Duravi (Retired)	----do----
82	Sayed Ali Shah GPS Ganda	GPS Ganda	----do----
83	S Khizar Abbas GMS Parachinar	GPS Kharpochi	----do----
84	Jabir Hussain GMHS Parachinar	GMHS Parachinar	----do----
85	S Mohsin Ali Shah GHS Samir	GHS Samir	----do----
86	Sajid Hussain GMS Ahmadzal	GMS Ahmadzal	----do----
87	Abbas Ali GMS Parachinar	GPS Noor Khan Kanda	----do----
88	Aqal Zaman GPS Shakh	GPS Shakh	----do----
89	S Munib Hussain GPS Lewan Khel	GPS Lewan Khel	----do----
90	Mazhar Hussain GPS Ali Shari	GPS Bughra	----do----
91	Niaz Ali GPS Mindanak	GPS Mindanak	----do----
92	S Hassan Ali Shah GPS Balish Khel	GPS Gosar	----do----
93	S Muhd Sibtain GPS Spina Mila	GMS Yousaf Khel	----do----
94	S Amjad Hussain GHS Mali Kali	GHS Mali Kali	----do----
95	Sabar Jalil GPS Kotri	GPS Kotri	----do----
96	Masood Khan GPS Dargi Ghuzgari	GPS Ghuzgari	----do----
97	S Iftikhar Hussain GPS	GPS Ghuzgari	----do----


ATTESTED

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S#	Name of Teacher & Present place of posting	Posted as.	Remarks
106	Muhammad Rashid GHS Ghozgari	GHS Dargai Ghuzgari	----do----
107	S Iftikhar Hussain GHS Qubad Shah Khel	GPS Mula Bagh	----do----
108	Tahir Hussain GHS Kirman	GMS Khomasa	----do----
109	Nasir Hussain GHS Zeran	GHS Zeran	----do----
110	Zamin Hussain GPS Kanda Abbas	GPS Matta Kirman	----do----
111	S Shamsul Hassan GMS Alamsher	GMS Alamsher	----do----
112	Shabir Hussain GPS Japaki Kali	GPS Japaki Kali	----do----
113	Wilayat Hussain GPS Borki No.2	GPS Borki No.1	----do----
114	S Abid Hussain GPS Alishari	GHS Bughdi	----do----
115	Jabir Hussain GMPs Yousaf Khel	GHS Luqman Khel	----do----
116	Kifayat Hussain GPS Dangila	GPS Kass Luqman Khel	----do----
117	Asmat Ali GPS Lala Mian Kali	GPS Lala Mian Kali	----do----
118	Zulfiqar Ali GPS Sidara	GPS Sidara	----do----
119	S Ashiq Hussain GPS Shublan	GPS Shublan	----do----

### Terms and Conditions:


- 1) They will be on probation for a period of one year extendable for another one year.
- 2) They will be governed by such rules and regulations is issued from time to time by the government.
- 3) Their services can be terminated at any time in case their performance is found unsatisfactory during probation period in case of mis-conduct they will be preceded under the rules framed from time to time.
- 4) Charge report should be submitted to all concerned.
- 5) Their inter seniority on lower post will remain intact.
- 6) No TA/DA is allowed for joining his/her duty.
- 7) They will give an undertaking to be recorded in their service books to the effect that if any over payment made to them in the light of this order will be recovered from them and if they are wrongly promoted, it will be reversed.

  
Agency Education Officer  
Kurram Agency Parachinar

Endst.No. 108-11/Edu: Dated. 11/01/2017.

Copy to the;

1. Director Education FATA Secretariat Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Agency Accounts Officer Kurram Agency at Parachinar.
4. AAEOs Local Office.
5. Official concerned.
6. Office file.

  
Agency Education Officer  
Kurram Agency Parachinar

  
**ATTESTED**

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Anna "K"

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 PSHT/SPST/PST TO SST (Phy,  
Maths) BPS-16**

.....  
**RESPECTED SIR!**

Appellant submits as under:

1. That the Appellant was appointed as PTC on dated 10.10.1994 through Endst:No.634-59 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 GPS Shani sehra 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 Khyber Pakhtunkhwa through letter No.4954 dated 07.08.2014 and letter No.4874 dated 06.08.2014 requested you to fill the vacant posts of SST (General/Science) in Government Higher Secondary/High & Middle Schools (M&F) FATA by promotion of in-service teachers under the existing rules.
4. That after requesting again and again by the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa through different letters your worthy office delayed the process and did not consider the Appellant for his due promotion.
5. That following the above mentioned same Notification, the District Education Officer Male Hangu through Endst No.3493-3562 dated 31.10.2014 promoted 49 SCTs/CTs, SDMs/DMs,

  
**ATTESTED**

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

6. That your August office has not observed the appellant promotion from his due date i.e 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 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.

ATTESTED

*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

*Amanullah*  
APPELLANT

AMAN ULLAH JAN S/O MIR ABDULLAH JAN R/O IMAMIA  
COLONY PARA CHINAR TEHSIL UPPER KURRAM  
DISTRICT KURRAM.

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Annex "L"

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

*Ammanullah.*

AMAN ULLAH JAN S/O MIR ABDULLAH JAN R/O  
IMAMIA COLONY PARA CHINAR TEHSIL UPPER  
KURRAM DISTRICT KURRAM

  
**ATTESTED**

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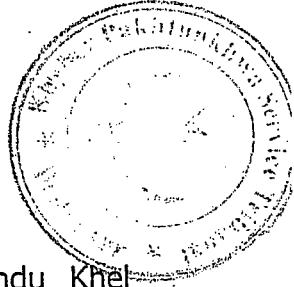
Amal M

**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**

**ATTESTED**  
Signature and stamp of the Member (Executive).

- 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".

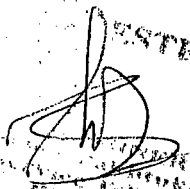
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- 11) Service Appeal bearing No. 1277/2018 titled "Rahmat Said Versus Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Secretariat building Peshawar and others".
- 12) Service Appeal bearing No. 1278/2018 titled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

  
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- 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".

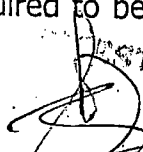
  
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Khyber Pakhtunkhwa  
Civil Secretariat, Peshawar

- 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 to be promoted in 2014.

  
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Civil Secretariat  
Peshawar

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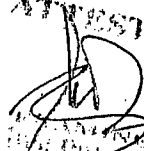
Feeling aggrieved, the appellants preferred respective departmental appeals against the impugned order dated 11-10-2017, which were not responded to, and hence the appellants filed service appeals in this Tribunal with prayers that promotions of the appellants may be considered from 24-07-2014 or the 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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K. S. KHAN  
Secretary  
Service Tribunal  
Peshawar

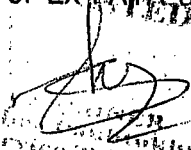


06. Learned Assistant Advocate General appeared on behalf of respondents has contended that as per Para-VI of promotion policy, promotions are always made with immediate effect and not with retrospective effect; that promotion is neither a vested right nor it can be claimed with a retrospective effect.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

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

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

  
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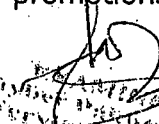
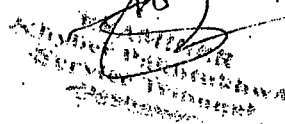
(10)

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)

Certified to be true copy

Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 4-1-22

Number of Warrants 3600

Copies 38/-

Date of Delivery of Copy 5-1-22

Date of Delivery of Copy 5-1-22

ATTACHED

قیمت 50 روپے	44509			
ایڈوکیٹ: عبد الرحمن گھمن		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بارنومل/ایسوسی ایشن نمبر: 10-0611				
رابطہ نمبر: 0300.5991598				

بعدالت جناب: سر وس ٹریبلونل پشاور

منجانب: Appellant	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
<b>باعث تحریر آنکہ</b>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کارروائی متعلقہ  
آن مقام کے آئی جی کے لیے عبد الرحمن گھمن ایڈوکیٹ کو وکیل مقرر  
کر 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  
دائرہ 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 وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا سناختہ پر داخیت منظور و قبول ہوگا  
دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم:  2022  
PESHAWAR BAR ASSOCIATION  
KHYBER PAKHTUNKHWA

مقام: پشاور کے لیے منظور ہے

Abdul Rehman Mohmand Attested  
Value Accepted

نوٹ: اس وکالت نامہ کی نوٹوگانی ناقابل قبول ہوگی۔

اصان اللہ خان ولد صاحب عبد اللہ خان ساکن اصحاب طاہری یادگار  
گھمن ایڈوکیٹ ڈسٹریکٹ کورٹ