


13th Oct., 2022 01. Counsel for the appellant present. Mr. Naseerud Din Shah, Assistant Advocate General for the respondents present.

02. After hearing learned counsel for the appellant and learned AAG for the respondents, the Tribunal was informed that the desired relief of promotion had already been extended to the appellant and the only grievance of the appellant, now remained, is allotment of correct seniority and antedation of promotion. Learned counsel states that the appellant would be advised to approach proper forum for the same. Disposed of accordingly. Consign.

03. **Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 13th day of October, 2022.**


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

(Handwritten signature)

(Handwritten initials)

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(Fareeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman

shall be accompanied by a copy of every seniority list or order or other documents on which the respondent wishes to rely in support of his case.

(3) The written reply shall be accompanied by 4 spare copies thereof, complete in all respects and containing copies of the lists, order and documents referred to in sub-rule(2), for use of the Tribunal.

05.07.2022

Counsel was telephonically informed for the date fixed 12/10/2022. Due to non-availability of postal tickets notice was not served upon them

Nemo for the appellant.

Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments before the D.B on 12.10.2022.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

12th Oct. 2022

Mr. Abdul Saboor, Advocate junior to learned counsel for the appellant present. Muhammad Adeel Butt, Addl: AG for respondents present.

Junior to learned counsel for the appellant seeks adjournment on the ground that learned senior counsel was busy before the august Supreme Court of Pakistan. To come up for arguments on 13.10.2022 before D.B.



(Farceha Paul)
Member(Executive)

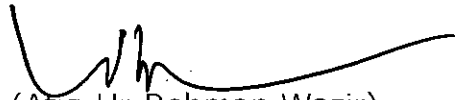
(Kalim Arshad Khan)
Chairman

6.08.2021

Junior to counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Lawyers are on general strike, therefore, case is adjourned. To come up for arguments on 15.12.2021 before D.B.



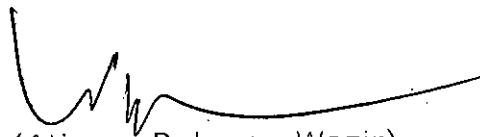
(Atiq-Ur-Rehman Wazir)
Member (E)

(Rozina Rehman)
Member (J)

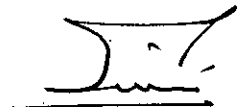
15.12.2021

Nemo for the appellant. Mr. Mujahid Khan, S.I alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for arguments on 30.03.2022 before the D.B.




(Atiq-ur-Rehman Wazir)
Member (E)



(Salah-ud-Din)
Member (J)

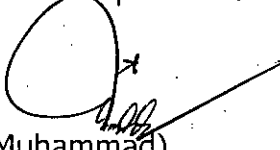
30-3-2022

Proper DB not available the case is adjourned to come up for the same as before on 5-7-2022


Reader

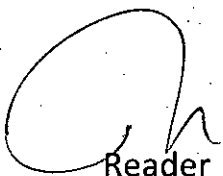
15.12.2020 Nemo for appellant. Mr. Muhammad Jan, DDA present.

On the last date of hearing, the hearing was adjourned on the strength of Reader Note while none of the parties were represented. Adjourned to 16.02.2021 for hearing before the D.B. Office shall issue notices to the parties for next date of hearing..


(Mian Muhammad)
Member(E)


Chairman

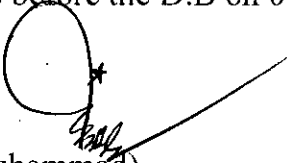
16.02.2021 Due to Pandemic of Covid-19, the case is adjourned to 27.05.2021 for the same.



Reader

27.05.2021

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Today's date was fixed on note Reader, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for arguments before the D.B on 06.08.2021.


(Mian Muhammad)
Member (E)


(Salah Ud Din)
Member(J)

Service Appeal No. 340/2015

10.02.2020


Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 16.04.2020 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member


*Due to Covid-19 the case is
adjourned. To come up for the same*

on - 13.07.2020-


Reader

13.07.2020

Due to COVID-19, the case is adjourned to 12.10.2020 before D.B.


Reader

12.10.2020

Due to incomplete Bench, the case is adjourned. To come up for the same on 15.12.2020 before D.B.


Reader

10.07.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney present. Upon query by this Tribunal as to how the appellant is qualified for promotion to the post of CT Agriculture. Learned counsel for the appellant seeks adjournment for further assistance. Adjourn. To come up for arguments on 25.09.2019 before D.B.



Member



Member

25.09.2019

Learnd counsel for the appellant present. Mr. Zia Ullah Learned Deputy District Attorney for the respondent present. Learned counsel for the appellant seeks adjournment Adjourned. To come up for arguments on 09.12.2019 before D.B



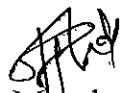
(Hussain Shah)
Member



(M. Amin Khan Kundi)
Member

09.12.2019

Lawyers are on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 10.02.2020 before D.B.



Member



Member


12.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 17.12.2018.


READER

17.12.2018

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come for arguments on 08.02.2019 before D.B


(Hussain Shah)
Member


(Muhammad Amin Khan Kundi)
Member

08.02.2019

Clerk to counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 23.04.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

23.04.2019

Clerk of counsel for the appellant and Addl. AG for the respondents present.

Due to general strike on the call of ^{Provincial} District Bar Council, instant matter is adjourned to 10.07.2019 for arguments before the D.B.


Member


Chairman

14.03.2018

Appellant absent. Learned counsel for the appellant is also absent. However, junior to learned senior counsel for the appellant present and seeks adjournment. Mr. Usman Ghani, District Attorney for the respondents present. Adjourned. To come up for arguments on 14.05.2018 before D.B.


(Muhammad Amin Khan Kundi)
Member


(Muhammad Hamid Mughal)
Member

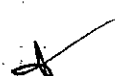
14.05.2018


Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for the same on 30.07.2018.


Reader

30.07.2018

Appellant absent. Learned counsel for the appellant is also absent. Mr. Ziaullah, Deputy District Attorney for the respondents present. Adjourned. To come up for arguments on 20.09.2018 before D.B.


(Ahmad Hassan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)

20.09.2018

Since 20 September 2018 has been declared as public holiday on account of Muharam Ul Haram. Therefore, the case is adjourned. To come up for the same on


12-11-2018


Reader

02.08.2017

Agent to counsel for the appellant and Asst: AG for respondents present. Agent to counsel for the appellant requested for time to file rejoinder. Adjourned. To come up for rejoinder and final hearing on 15.11.2017 before D.B.


(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

15.11.2017

None present for appellant. Mr. Kabeerullah Khattak, Addl. AG for the respondents present. To come up for rejoinder and arguments 11.01.2018 before the D.B.

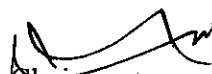

Member


Chairman

10.1.2018

Clerk of counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. To come up for arguments on 14.03.2018 before the D.B.


Member


Chairman

04.08.2016

Counsel for the appellant and Mr. Hameed ur Rehman, AD (Lit) alongwith Addl. AG for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing on

9-12-16.


Member

09.12.2016

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourned. To come up for rejoinder and arguments on 18.4.17.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

18.04.2017

Clerk of the counsel for appellant present. Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Clerk counsel for the appellant requested for adjournment on the ground that counsel for the appellant is not available today. Last chance is given for submission of rejoinder. To come up for rejoinder and arguments on 02.08.2017 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

31.07.2015

Counsel for the appellant, M/S Khurshid Khan, SO and Javed Ahmed, Supdt. alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 29.10.2015 before S.B.


Chairman

29.10.2015

Counsel for the appellant and Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 25.2.2016 before S.B.


Chairman

25.02.2016

Appellant in person and Mr. Javed Ahmed, Supdt. alongwith Addl: A.G for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity is extended subject to payment of cost of Rs. 200/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 29.4.2016 before S.B.


Member

29.4.2016

None present for the appellant. Addl. AG present. None present as representative on behalf of the respondents. Written reply not submitted despite last chance including extension of the same by cost of Rs. 200/-. Requested for further adjournment. Another last opportunity is extended subject to payment of further cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost of Rs. 1200/- on 04.08.2016 before S.B.


Chairman

3 29.04.2015

None present of appellant. The appeal be relisted for preliminary hearing and notice to counsel for the appellant be issued for 12.5.2015 before S.B.


Chairman

12.05.2015

Learned Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as SPST and entitled to be considered for promotion against 60 % quota reserved for HPST. That the appellant was not considered against the said quota and he preferred departmental appeal on 05.01.2015 which remained unresponded and hence the instant service appeal on 13.04.2015.

That the appellant is entitled to be considered for promotion as C.T Agriculture (BPS-15) and that the proceeding for initial appointment against the entire four seats is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 31.07.2015 before S.B.


Chairman

Appellant Deposited
Security & Process Fee

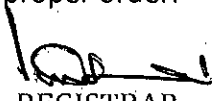



71-N-P.S

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 340/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	17.04.2015	<p>The appeal of Mr. Ihsanullah resubmitted today by Mr. Asif Ali Shah Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-4-15</u></p> <p> CHAIRMAN</p>
2	27-4-15	

The appeal of Mr. Ihsanullah son of Badi-uz-Zaman PST GPS. Kacha Bachak Ghurewala, Distt. Bannu received to-day i.e. on 13.04.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of respondent No.4 is incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexure-K is not attached with the appeal which may be placed on it.
- 3- Copy of order dated 20.2.2015 mentioned in para-11 of the memo of appeal is not attached with the appeal which may be placed on it.
- 4- Annexures-C, I and J of the appeal are illegible which may be replaced by legible/better one.
- 5- Annexures of the appeal may be attested.
- 6- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 495 /S.T.

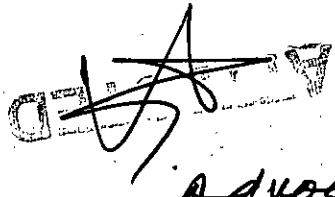
Dt. 15/4 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asif Ali Shah Adv. Pesh.

R/sir.

The case is re-submitted ^{be fixed} before the
Hon'ble Bench


Advocate

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. 340 /2015

Ihsan Ullah.....Appellant

Versus

Govt. of K.P.K. & Others..... Respondents

INDEX

S.No.	Particulars	Annexure	P.No
1	Memo of Appeal		1-5
2	Affidavit		6
3	Address of the Parties		7
4	Certificates of Appellant	"A"	8-10
5	Copies of Notifications	B&C	11-21
6	Advertisement	D	22
7	Letters	E	23-25
8	Sanction Posts	F	26
9	Seniority List	G	27
10	Applications	H	28-31
11	DPC promotion order and Letter	I&J	32-37
12	Copy of departmental appeal dated:05.01.2015 & Letter	K&L	38-39
13	Wakalathnama		


Appellant
Through: 

Asif Ali Shah
Advocates High Court,
Peshawar
Cell No.0333-9006806

Dated: 09.04.2015

12

**BEFORE K.P.K, SERVICE TRIBUNAL, K.P.K,
PESHAWAR**

Appeal No. 340 /2015

Ihsan Ullah S/O Badi-uz-Zaman;
SPST, Kacha Bachak Ghurewala, Bannu.
Appellant

**N.W.F. Province
Service Tribunal**
Diary No. 336
Dated 13-4-2015

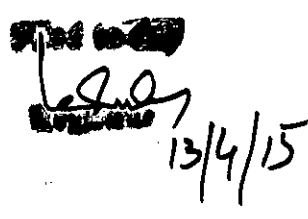
VERSUS

1. Govt. of K.P.K.; through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
 2. Director Elementary & Secondary Education K.P.K., Dabgari Garden Peshawar.
 3. District Education Officer (Male) District Bannu.
 4. Deputy District Officer^{Edle} (M) Bannu., GHS No.4, Bannu city
- Respondents

**APPEAL U/S 4 NWFP SERVICE TRIBUNAL
ACT 1974 AGAINST THE ORDER OF
RESPONDENT NO. 3 DATED:15.12.2014
WHEREBY THE APPELLANT HAS NOT BEEN
GIVEN HIS DUE POSITION FOR PROMOTION AND
NOT PROMOTED AS CT (AGRICULTURAL)
TEACHER.**

Prayer:

IT IS, HUMBLY PRAYED THAT ON ACCEPTANCE OF THIS appeal THE RESPONDENTS MAY KINDLY BE DIRECTED TO FOLLOW THE NOTIFICATION NO. SO(PE)4-5/SSRC(Teaching Cadre)2012 AND NOTIFICATION NO. SO(PE)4-5/SSRC/MEETING/2013/TEACHING CADRE IN ITS TRUE LETTER AND SPIRIT AND ALL ACTS


13/4/15

DONE AGAINST TO the POLICY BE DECLARED
VOID ABINITIO BEING AGAINST THE
FUNDAMENTAL RIGHTS GRANTED UNDER THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN.

FURTHER THE RESPONDENTS MAY KINDLY
BE DIRECTED THAT A DPC MAY KINDLY BE
HOLD FOR THE APPELLANT AND KINDLY MAY
BE GIVEN his DUE POSITION FOR PROMOTION
AND THE APPELLANT MAY BE PROMOTED AS CT
(AGRICULTURAL) TEACHER FROM 15-12-2014
WITH ALL BACK BENEFITS.

Respectfully Sheweth

FACTS:-

1. That the Appellant is permanent resident of District Bannu and as such hold domiciled certificate of the district concerned.
2. That the Appellant is serving as Primary School Teachers from his appointment till date. The Appellant having qualification of Certified Teacher Agro Technical and experience in his filed.
{Copies of Certificates are attached as annexure-A}
3. That the Government of KPK through Respondent No.1 issued a Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre dated:13/11/2012 wherein the policy for appointment/promotion and transfer has been framed in light of Civil Servants (Appointment, Promotion and Transfer) Rules 1989.
{Copy of Notification dated: 13.11.2012 is attached as annexure-B}
4. That the on April 24, 2013 the Government of KPK through Respondent No.1 made some amendments in Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre; dated:13/11/2012 through another Notification No. SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre.
{Copy of Notification dated: 24.04.2013 is attached as annexure-C}
5. That the respondent No.3 against the policy advertised the vacant posts of Certified teachers of all category including CT Agriculture in District Bannu. The teacher

community of district Bannu strongly resisted the act of the Respondent No.3 against the policy.

{Copy of advertisement is attached as annexure-D}

6. That the Respondent No.3 sought guidance from respondent No.2 and the guidance was issued with the direction to follow the rules / policy.

{Copy of letters are attached as annexure-E}

7. That there are 36 sanctioned posts of CT (Agricultural) in District Bannu in which 4 post were lying vacant according to **Annexure-D** and two others teacher were retired that's why the total vacant posts in District Bannu are more then 6.

{Copy of sanctioned post is attached as annexure-F}

8. That the Appellant is the most senior in the PSTs having qualification and CT Agriculture and entitled for promotion to the post of CT Agricultural according to policy / rules.

{Copy of seniority is attached as annexure-G}

9. That the Appellant also filed so many representations / applications for redressal of their grievances, which was processed but till date the response is awaited.

{Copy of applications are attached as annexure-H}

10. That the respondent No.2 & 3 hold a DPC meeting and promoted PSTs having qualification for CT General and left the posts of CT Agricultural vacant. When the Appellant being eligible and entitled for those vacant posts contacted the respondent No. 2 & 3, the respondents take a shelter of a letter issued by the office of Respondent No.2, "**that there will be no promotion to CT BPS-15 for specific field and all fields has been amalgamated in CT General**".

{Copy of Order of DPC dated: 15.12.2015 & Letter dated:22.06.2014 are attached as annexure-I&J}

11. That the Appellant was aggrieved from this act of the Respondents preferred a departmental appeal to Respondent No.1 which was processed but not decided in the statutory period.

{Copy of departmental appeal dated:05.01.2015 & Letter dated:20.08.2015 are attached as annexure-K&L}

12. That the appellant now approaches this Honourable Tribunal against the above said order on the following grounds amongst the others:-

Grounds:



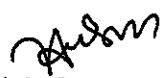
A. That the Appellant have excellent service record which clearly shows that the Appellant has been performed his

service regularly and during the said period his moral character was too excellent, hence, not holding DPC for the promotion for the Appellant by the Respondents is a great discrimination and against the rules and regulation.

- B. That the Appellant is very hardworking and punctual in his duties, therefore, no complaint received by the Respondents No. 3 & 4 against the Appellant but the Respondents unlawfully creating hurdles in the way of promotion of the Appellant, which is against the law and fundamental rights of the Appellant.
- C. That the Appellant is the most senior in his colleagues and according to rules and procedures he is entitle for promotion, but the acts of respondents not considering in the DPC meeting dated:15.12.2014 and not holding a separate DPC for the promotion of those PSTs who having qualification in specific fields like Appellant, are illegal and unlawful act, which has fallen the Appellant as well as his famy in a great mental crises, so needs interference of this Court on the quota reservation.
- D. That this conduct of the Respondents has not only enhanced the agonies of the Appellant, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on the part of the Respondent No,2&3 which needs to be judicially handled and curbed, inorder to save the poor masses and provide them an opportunity to lead their lives freely and with the enjoyment of all of their fundamental rights, which are provided for them in the Constitution of Islamic Republic of Pakistan 1973.
- E. That unless and until the proper Orders / direction of appellant promotion are not issued, serious miscarriage of justice would be caused to the Appellant and the appellant would be suffered by the Orders of the Respondents which are fanciful, suffering from patent perversity and material irregularity, needs correction from this Hon'ble Court.
- F. That the Respondents erroneously exercised their discretion against judicial principle and not considered the Appellant for promotion against the posts of CT (Agricultural), hence direction for arranging DPC for Appellant and the orders of the promotion of the Appellant according to rules would be just and proper.
- G. That the Appellant have got a constitutional right to be treated as according to the law. The appellant have the right to be considered for promotion to CT Agricultural while the respondents by an unlawful discriminatory act ignored the Appellant and give opportunity to their blue eyed for promotion, which is against the norms of justice.
- H. That the Appellant has been discriminated without any just and reasonable cause and thereby offending the fundamental rights of the Appellant as provided by the constitution of 1973.

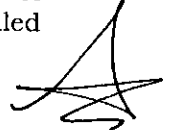
- I. That the Appellant, after running from pillar to post but of no avail, finally decided to approach this Hon'ble Court for seeking justice as no other adequate and efficacious remedy is available to them.
- J. That the Appellant reserves rights to advance other points at the time of hearing this petition.

IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE ABOVE SUBMISSIONS THE INSTANT APPEAL MAY GRACIOUSLY BE ACCEPTED AS PRAYED FOR HEREIN ABOVE.


 APPELLANT
 Through 
 Asif Ali Shah
 & 
 Haseen Ullah Gamaryani
 Advocate High Court,

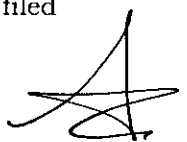
VERIFICATION:

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate 

Note:

That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Advocate 

"6"

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. _____/2015

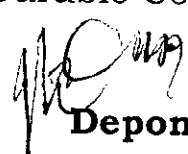
Ihsan Ullah.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

Affidavit

It is hereby solemnly affirm and declare on oath that all the contents of the instant appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from this Honourable Court.


Deponent



207

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. _____/2015

Ihsan Ullah.....Appellant

Versus

Govt. of K.P.K. & Others..... Respondents

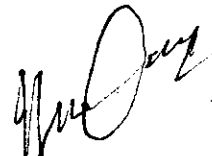
ADDRESSES OF THE PARTIES

APPELLANT

Ihsan Ullah S/O Badi-uz-Zaman;
SPST, Kacha Bachak Ghurewala, Bannu.

RESPONDENTS

1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education K.P.K., Dabgari Garden Peshawar.
3. District Education Officer (Male) District Bannu.
4. Deputy District Officer (M) Bannu.



APPELLANT

Through:

Asif Ali Shah
Advocates High Court,
Peshawar

Roll No. 37 /

Session 2004-05 8

GOVERNMENT AGRO TECHNICAL TEACHERS TRAINING CENTRE

Attested
[Signature]
Yaqoob Khan SCT(BPS-18)
GHSS Shahbaz Azmat Kheh
Bannu



Annex - A1

P E S H A W A R

PROVISIONAL CERTIFICATE

This is to certify that Mr./Miss TECANULLAH KHAN

No/D/o BADI UZ ZAMAN of District BANNU

has passed C. T. ~~Exam~~ Agriculture/ ~~Exam~~ Examination 2005

He/ She obtained 991 Marks out of 1400 and was placed in Ist division.

The result was declared on 30.12.2005 200

He/ She bears good moral character.

ATTSTED

[Signature]

[Signature]

PRINCIPAL
Govt. Agro Technical Teachers
Training Centre No.2
Peshawar

(9)

Allama Iqbal Open University
Islamabad



Serial No. 146320

Certified that Mr. / Ms. IHSAN ULLAH KHAN

Son / Daughter of BADI-UZ-ZAMAN


Registration No: 03-NBU-1033 Roll No: O-620779

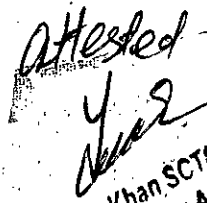
having successfully completed the prescribed requirements

in semester AUTUMN 2004 is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured 61 % marks and has been placed in B grade.


CONTROLLER OF EXAMINATIONS
SRS

Attested

Yaqoob Khan SCT (BPS-16)
GHSS Shahbaz Azmat Khel
Bannu


VICE-CHANCELLOR

Result declared on: July 26, 2005

Date of Issue: January 17, 2011

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

Serial No. 50242

10

Registration No. 6820-PBS-2000

Roll No. 4333

Session:

GOMAL UNIVERSITY

DERA ISMAIL KHAN
N. W. F. P.
PAKISTAN

Attested

Yusuf
Yaqoob Khan SCT(BPS-16)
GHSS Shannar Azmat Khel
Bannu



Provisional Certificate

This is to certify that Mr. / Miss / Mrs. INSAN ULLAH KHAN

Son / Daughter / Wife of BADI UZ ZAMAN

of the Department / Institute of PRIVATE CANDIDATE OF DISTT: BANNU

has passed MA. ANNUAL, 2003, FINAL Examination held in APRIL, 2004

in the subject of ISLAMIYAT

He / She was placed in SECOND

division, Securing 628 marks out of 1100

The examination was taken as a whole / in parts.

Dera Ismail Khan

Dated 24-12-2004

CONTROLLER OF EXAMINATIONS

11

ANNEX - B



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PE)4-S/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.

Inst. 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 (E&A), Peshawar.

Attested
AC

12



8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database(EMIS) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
15. All Agency Education 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. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.

Section Officer (Primary)

Attested
[Handwritten Signature]

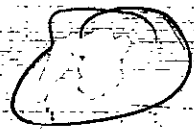
6/13/22



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

Attested

9/12/2



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

Attested
[Signature]

415



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

Attested

SECRET

416

Annex - C

205
10/7/13

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.**

NOTIFICATION

Peshawar, dated the April 24, 2013.

No. SO(PS) 5-5/SSRC/Meeting/2013/Teaching Cadre: In pursuance of the provisions contained in sub-rule (2) of rule 5 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO(PE) 5/SSRC/Meeting/2012/Teaching Cadre dated: 13-11-2012, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix:-

(1) against Sr. No. 2, in column No. 5 for the existing entry, the following shall be substituted, namely:

By promotion, on the basis of seniority-cum-fitness, from amongst the Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with *Shakhsat ulia Fil Uloom ul Arabia wal Islamia* from *Tanzimat ul Wafaqul Madaris* / *Madaris* recognized by Higher Education Commission or *Darul Uloom Saidu Sharif Swat*, *Darul Uloom Charbagh Swat*, *Darul Uloom Chitral*, *Darul Uloom Darosh Chitral* and any other Government run *Darul Uloom*s, as notified by the Government from time to time as the case may be.

ATTESTED

Section Officer, Planning
Elementary and Secondary
Education Deptt.
Khyber Pakhtunkhwa

18

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

Enclst: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRI Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. The Deputy Director, EMIS (SR-SE) Department Khyber Pakhtunkhwa Peshawar.
12. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers in FATA.
16. All Agency Account Officers in FATA.
17. PS to Governor Khyber Pakhtunkhwa Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa Peshawar.
22. Master file

~~ATTACHED~~

Yours faithfully,

(HINA SAIED)
SECTION OFFICER (PRIMARY)

Khyber Pakhtunkhwa

(ii) against Sr. No. 3 in column No. 5 for the existing entry the following shall be substituted, namely:

By promotion on the basis of seniority-cum-fitness, from amongst the Theology Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with Shohdatul Alia Fil Uloomul Arabia wal Islamiya from Tanzimuatul Wafaqu/Madaris /Madaris recognized by Higher Education Commission or Darul Uloom Saide Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom as notified by the Government from time to time as the case may be.

(iii) against Sr. No. 4 for the existing entries the following shall be substituted, namely:

1.	2.	3.	4.	5.
4	Senior Certified Teacher (SCT) (BPS-16)			By promotion on the basis of seniority-cum-fitness, from amongst the Certified Teacher (General), Certified Teacher (Industrial Arts), Certified Teacher (Agriculture) and Certified Teacher (Home Economics) of the concerned districts with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General), Certified Teacher (Industrial Arts), Certified Teacher (Agriculture), Certified Teacher (Home Economics) or having qualification of B.Ed /MA Education /B.S Ed or equivalent qualification from recognized University or Institution, as the case may be.

Entries against serial Nos. 6 and 8 the existing entries shall respectively be deleted.

Section Officer, Primary
Elementary and Secondary
Education, District
Khyber Pakhtunkhwa



(ii) against Sr. No. 3, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with Shahdatul Alia Fil Uloomul Arabia wal Islamia from: Tanzimuatul Wafaqul Madaris /Madaris recognized by Higher Education Commission or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time, as the case may be.";

(iii) against Sr. No. 4, for the existing entries, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Senior Certified Teacher (SCT) (BPS-16).	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the Certified Teacher (General), Certified Teacher (Industrial Arts), Certified Teacher (Agriculture) and Certified Teacher (Home Economics) of the concerned districts with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General), Certified Teacher (Industrial Arts), Certified Teacher (Agriculture), Certified Teacher (Home Economics) or having qualification of B.Ed /MA Education /BS Ed or equivalent qualification, from recognized University or Institution, as the case may be.";

Attested
[Signature]

(iv) against serial No. 5, 6 and 8, the existing entries shall respectively be deleted;

Section Officer (Primary)
Elementary and Secondary
Education
Khyber Pakhtunkhwa

Yours faithfully,

[Signature]

207



207

(v) serial No. 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21 and 22 shall be renumbered as serial No. 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 and 19;

(vi) against serial No. 6, as so renumbered, in column No. 5, for the existing entry, the following shall be substituted, namely:

"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 as prescribed for initial recruitment of Physical Education Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with Senior Diploma in physical Education/Diploma in physical Education/B P.Ed or equivalent qualification from recognized University or Institution, as the case may be.";

(vii) against serial No. 9, as so amended, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Qaris, with at least five years service as such and having qualification prescribed for initial recruitment of Qari or having Intermediate with Qirat Sanad from a recognized Board/Institution, as the case may be.";

(viii) against serial No. 16, as so amended, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Primary School Teachers with at least ten years service as Senior Primary School Teacher and Primary School Teacher."; and

(ix) against serial No. 17, as so amended, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher or having qualification of CT/B.Ed /MA Education Honour /BS Ed or equivalent qualification from recognized University or Institution, as the case may be.";

Attested
[Handwritten signature]

Section Officer (Primary)
Elementary Education
District Office
Dibrugarh

Yours faithfully,

101-8/1828

4212



208

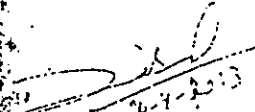
SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Encls : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
12. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers in FATA.
16. All Agency Account Officers in FATA.
17. PS to Governor Khyber Pakhtunkhwa, Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.
22. Master file

Attested

~~ATTESTED~~


(HINA SAEED)

SECTION OFFICER (PRIMARY)

Khyber Pakhtunkhwa

42

Yours faithfully,

درخواستیں منسلک ہیں

حکومت پنجاب کی سرکار نے اس کی طرف سے ایک نوکری کی آگاہی جاری کی ہے۔ اس آگاہی کے تحت اس وقت تک درخواستیں قبول کی جائیں گی جب تک کہ اس آگاہی کے تحت اس وقت تک درخواستیں قبول کی جائیں گی۔

Table with 4 columns: No. (No. 1-12), Category (e.g., CT, DM, PET, AT, TT), and Description of posts and conditions. Includes details about agricultural and industrial categories.

Table with 4 columns: Post Name, No. of Posts, and other details. Lists various posts like 'Agricultural Officer' and 'Industrial Officer'.

نوٹ: - اس آگاہی کے تحت اس وقت تک درخواستیں قبول کی جائیں گی جب تک کہ اس آگاہی کے تحت اس وقت تک درخواستیں قبول کی جائیں گی۔ اس آگاہی کے تحت اس وقت تک درخواستیں قبول کی جائیں گی۔

Reference vide Published in the News etc. dated of different items. The items at serial Screen it should be (DIR) Emergency B Khy www.khyberpaktun

Table with 4 columns: Year (2012-13), Post Name, No. of Posts, and other details. Lists various posts and their corresponding numbers.

ATTACHED

4247

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA.

No. 1123 /F.No.155/Vol:III/PST (M)

Bannu.

Dated Peshawar the 11/11/2014

To,

The District Education Officer (M)
Bannu.

Subject: - APPEAL FOR PROMOTION.

Memo:-

I am directed to enclose herewith a copy of the application in respect of Irfan Ullah PST, Gulab Naz PST and Ihsanullah PST on the subject noted above for necessary action under the existing rules/policy.

Deputy Director (Estab.)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Encls: No. _____

Copy forwarded to the:

1. P.A to Director Elementary and Secondary Education local office.

ARE-I/M-S

For necessary action
under the Rules/policy

[Handwritten signature]

1730 (100)

14/11

Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Attested

[Handwritten signature]

4282



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)E&SED/2-8/DSC /2014
Dated Peshawar the 12-12-2014

To,

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar

Subject:- APPLICATION FOR PROMOTION FROM PST TO CT
AGRICULTURE.

I am directed to refer to the subject noted above and to enclose herewith a copy of application along with its enclosures in r/o Gulap Naz & 2 others resident of District Bannu for further necessary action and report.

Encl: As Above:

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

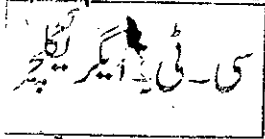
ATTACHED

"27"



Annex - G

Page 1 of 1



Office Of The Sub - Divisional Education Officer (Male) District Bannu

O/S Myran Gate, Miryan Road, Bannu.

Tentative Seniority Lisyt of PSTs (BPS-15, BPS-14 & BPS-12) for the Departmental Promotion

S.No;	Sen; S.No;	Pers; No	Teacher's Name	BPS	Date of Birth	1st Entry into Govt; Service		Academic Qualification	Professional Qualification	Result Declaration Date (RDD)		Place of Posting / School	Circle
						as	Taking over Charge			PTC	CT		
1	477	00177993	Irfan Ullah	15	08/03/1971	PST	17/04/1993	BA	PTC;C.T;(Agr;)B.Ed;	27/10/1992	12/08/2004	GPS No:1 Bannu City	
2	883	00179086	Gulap.Naz Khan	14	02/08/1972	PST	21/04/1999	BA	PTC;C.T;(Agr;)	19/09/1996	2004-2005	GPS Nazar Ali Mandew	
3	1139	00348025	Ihsan Ullah Khan	12	11/03/1980	PST	02/09/2006	MA	PTC;C.T;(Agr;)	1996-1997	?	GPS Kacha Bacak Ghoriwala	
4	1180	00357227	Abdul Salam	12	10/09/1977	PST	11/01/2007	BA	PTC;C.T;(Agr;)	27/09/2003	?	GPS No:1 Bannu City	
5	1216	00474707	Ijaz Ali Khan	12	08/09/1976	PST	18/04/2009	MA	PTC;C.T;(Agr;)	1995-1996	?	GPS Ismail Khel	

Attested

Sub Divisional Education
Officer (Male) Bannu

Annex-A

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (میل) بنوں۔

تاریخ

استھوار میں سی ٹی ایگریکچرل کوشن کرنا۔

STATEMENT OF G.P. AGRICULTURE POST IN HIGH SCHOOL BANNU DISTRICT

S.NO	Name of School	No of post	Sanction No & Date
1.	GHS NO 3 Bannu	3	NO. SOE(III)2-2/80 Vol xxxi Dated 14.7.85 NO -----do----- Dated 8.8.1982 NO SOE(iii)2-2/80 Vol xlii dated 1.8.1980
2.	GHS Azim Killa	1	NO SOE(iii)2-2/80 Vol xxi Dated 1.8.83
3.	GHS Jando Khel	1	NO SOE(iii)2-2/80 (B) dated 7.1.80
4.	GHS Ismail Khel	1	NO SOE(III)2-2/80 (B-Vol xxx dated 25/8/84
5.	GHS Bazar Ahmad Khan	2	NO SC-Ix/52-60 dated 24.1.1962 NO SOE(iii)2-2/80 vol xxv dated 1.8.1983 NO SOE(III) 2-2/80 (E) Dated 7.11.1990
6.	GHS Nar Shakrullah	1	NO SOE(III) 2-2/80 dated 30.8.1986
7.	GHS Kotka, Muhammad Khan	1	NO SOE(III) 2-2/80 Dated 30.8.1986
8.	GHS Kakki	1	NO SOE(III) 2-2/80 dated 15.10.88
9.	GHS Domel	1	NO SOE(III) 2-2/80 dated 14.7.85
10.	GHS Ghoriwala	1	NO SOE(III) 2-2/80 dated 1.8.1983
11.	GHS Lalozai	2	NO SOE(III) 2-2/80 dated 14.7.85
12.	GHS Nurar	1	NO 62 dated 8.7.83
13.	GHS Hukam Zad	1	NO Govt og WP No SC-ix-5/47-60 dated 20.2.1962
14.	GHS Mamash Khel	1	No 6624-32 Date 16/10/98
15.	GHS Bannu	1	No 7856/HE/8/21 Date 11.4.55
16.	GHS BO.I Bannu	2	No SOIX-6/55-61 Date 24.1.62, 14.7.85
17.	GHS NO 2 Bannu	3	No SOE(III) 2-2/80 Dated 14.7.85
18.	GHS Kotka Ayaz	3	No SOE(III) 2-2/80 Dated 14.7.85
19.	GHS Sero Bada Khel	1	No SOE(III) 2-2/80 Dated 14.7.85

① GHS No 3 Bannu
 ② GHS Azim Killa
 ③ GHS Jando Khel
 ④ GHS Ismail Khel
 ⑤ GHS Bazar Ahmad Khan

33
 + 3

 36

Executive District Officer
 Schools & Literacy Bannu

ATTESTED

2. 4 H 55. S.K. Bala

30
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 31
 2
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No SOE(III) 2-2/80 Dated 14.7.85

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Annex-H

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (میل) بنوں۔

اشتہار میں سی ٹی ایگریٹیک کو مشتہر کرنا۔

عنوان :-

جناب عالی!

گذارش ہے کہ ہمیں باخبر ذرائع سے معلوم ہوا ہے کہ آنے والے اشتہار میں صرف سی ٹی جنرل مشتہر ہو رہا ہے۔

جناب والا سی ٹی کے تین 3 کیٹگری ہیں۔

1۔ سی ٹی جنرل۔ 2۔ سی ٹی ٹیکنیکل۔ 3۔ سی ٹی زراعت۔

جناب والا چونکہ ہم سی ٹی زراعت ہیں؟ اور اس سے پہلے بھی تمام اشتہارات میں سی ٹی کی تمام کیٹگری علیحدہ علیحدہ مشتہر ہوئے تھے۔

اور علیحدہ علیحدہ میرٹ لیٹ کے مطابق ان کی تقرریاں ہو چکی ہیں۔

لہذا گذارش ہے کہ آنے والے اشتہار میں بھی تمام کیٹگری کو علیحدہ علیحدہ مشتہر کیے جائیں کیونکہ ڈسٹرکٹ ایجوکیشن آفس بنوں میں

اب بھی زراعت کی پانچ اور ٹیکنیکل کی ایک 1 آسامی خالی ہیں۔

شکریہ!

الغرض

مورخہ 28/12/2013

1۔ گلاب ناز 2۔ عرفان اللہ 3۔ وحید اللہ 4۔ عارف اللہ 5۔ احسان اللہ 6۔ ایم اللہ وغیرہ

Director of Education

For n. a. n. a.

to n. a. n. a.

Attested

A

Secretary To Minister for
Secondary Education
Fakhrul Khwa

3.5

12/13

بخدمت جناب سیکرٹری صاحب ایڈمنسٹریٹو اینڈ سٹڈی اینڈ ریسرچ ایجوکیشن سیکرٹری



عنوان: درخواست برائے پروفیشنل PST سے سی ای زراعت

11

جناب عالی!

خود بانہ گزارش ہے کہ ضلع بنوں میں سی ای زراعت کی چھ اسماںیں خالی ہیں۔

کے مطابق سی ای زراعت کی حالی اسماںوں میں 60 PST سے پروفیشن اور 40 initial recruitment

جناب والا! 24/11/14 کو ضلع بنوں میں ججہ منفرد ہوئی۔ اس وقت میں بیماری اور پروفیشن ہوئی تھی

لیکن ڈائریکٹر صاحب کی ایک لیٹر جو 26/12/14 کو صرف ضلع بنوں کو احتجاج کے تحت ارسال کیا

اس لیٹر نے بریف لگائی کہونکہ اس میں سی ای کے دیگر categories کو نظر انداز کیا ہے اور صرف سی ای جنرل کا ذکر کیا ہے۔ جو کہ بالیسی کے برعکس ہے۔

جناب والا بالیسی بالکل واضح ہے۔ نہ اس کے بعد کوئی اور بالیسی آئی ہے۔ اور نہ اس میں کوئی

ترمیم ہوئی ہے۔ میں بالیسی سیکرٹری کا علیحدہ علیحدہ پروفیشن اور لکھنوی کا طریقہ دونا میں

لکھنوی جناب کی خدمت میں لکھتا ہے کہ بالیسی کے مطابق ہمیں اپنا حق دیا جائے۔ اور 60

کے حساب سے پروفیشن کا حکم جاری کیا جائے۔ تمام نقول نف میں 30 زراعت کا ذکر

عین گزارش ہوگی۔

5/12/2014.

Handwritten signature and initials.

8/12/14

ایم ایضاً رضوان

Handwritten signatures and names: 1. طالب نادر SPST, 2. احسان اقصان SPST, 3. عبدالسلام SPST

Handwritten signature and stamp: ATTACHED

1890 5/14

Handwritten signatures and stamps: 800E, DSA, 8/12

حضرت جناب ڈائریکٹر صاحب ایگرونی انڈسٹریل ایجوکیشن پنشنر

عنوان: PST سے سی ٹی زراعت کے پوسٹوں پر پروموشن

جناب عالی!

گذشتہ ہے کہ ضلع بنوں میں سی ٹی زراعت کی چھ اسامیاں خالی پڑی ہیں جن پر ابھی تک کوئی پروموشن یا تقرری نہیں ہو سکی ہے۔

جناب والا! پالیسی کے مطابق سی ٹی زراعت کے خالی پوسٹوں پر 60% PST سے پروموشن اور 40% فزیشن NTS کے ذریعہ بھرتی ہوگی لیکن DEO صاحب بنوں پالیسی سے اعتراف کر رہے ہیں۔

لہذا جناب کی خدمت میں استدعا ہے کہ DEO بنوں کو ہدایات جاری کیا جائے کہ PST سے سی ٹی زراعت کے لیے 60% کے حساب سے پروموشن دیا جائے۔

عین نوازش ہوگی

فوراً 11/11/2014

۱۷۷۳۱

۱۶/۱۱/۱۴

العامر صاحب

سید سعید علی شاہ

- ① عرفان اللہ PST
 - ② گل اپ ناز PST
 - ③ احسان اللہ PST
- (ضلع بنوں)

Attested

☆



حکومت پنجاب کی ایسی اوروں کے لیے درخواستیں منظور کرنے کے لیے

مخوالہ اور درخواست لہے پروڈکشن آپس سے جو آجے زراعت

ضابطہ عالی!

جو بائزر ڈرائنگ ہے کہ ضابطہ نوں میں آجے زراعت کی جو اصلاحیاں جاری ہیں 4 اصلاحیوں کا

اشتہار DE 50 سرکار علی شاہ کے دیا گیا۔ جن کے افری تاریخ 25.1.2013 ہے اور ان

اصلاحیوں پر ایسی تک کوئی لہری عمل میں آئی ہے۔ اس کے بعد 2013.3.5 کو

فصل مین آجے زراعت G.H.S. غوروالہ سے اور سرکار علی شاہ آجے زراعت 26.9.14

کو G.H.S. نورانی سے دیکھ کر ہوئے ہیں۔ اسی طرح حالی اصلاحیوں کی عمل شدہ

جو ضابطہ

ضابطہ عالی (پالیسی) کے مطابق 60% پروڈکشن Through D.P.C. ہوئے اور یہ 40

Initial لہری ہوگی۔

لیفٹرا ضابطہ کے تحت میں لہری ہے کہ پالیسی کے مطابق 60% حساب سے D.P.C.

آجے زراعت کے سرکار صاحب کو لہری ہے۔ نام D.P.C. کا انعقاد ہوئے۔ لیفٹرا

میں عمرہ دراز سے ان اصلاحیوں کے لیے لہری ہے ہیں۔ اس طرح ہمیں

Attested

عین وزارت جوئے

بہ قانون حق میں ہے گا۔

تاریخ 31.10.2014

الکاحیان

GP. Kacha Bachak P.S.T. Choniwala

GP. Mandan P.S.T.

GP. No. 2 Banna P.S.T.

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) BANNU**

ORDER:-

Consequence upon the recommendations of the departmental promotion committee in pursuance of the Khyber Pakhtunkhwa Elementary and Secondary Education notification No. SO(PE)/4-5/SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012 read the amendment notification No: SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24-04-2013, the following PSHT are hereby promoted to the post of C.T.(Male)BPS-15 (Rs: 18500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in teaching cadre from the date of their taking over charge.

S.No	S.L. No.	NAME	PRESENT POST AS PSHTs	PLACE OF POSTING AS C.T. B-15
1	13	Akhya Jan	GPS Sher Gul Khujari	GHSS Hakim Hawed
2	47	Muhammad Roshan	GPS Sher Gul Khujari	GMS Umar Khan Mama Khel
3	57	Nisar Khan	GPS Hakim Bharat	GMS Muhammad Khan Kakki
4	60	Naimat Ullah Shah	GPS Haji Behram	GMS Behram Chay Ghari Mamash Khel
5	101	Sher Bali Khan	GPS Zargar Mama Khel	GMS Tarket Zargar Mama Khel
6	117	Saddar Nawaz Khan	GPS Ala dad Mamash Khel	GMS Amandi Shah Jehan (Shah Niaz)
7	127	Rafi Ullah Khan	GPS Ahmad Shah Sarki Khel	GHSS Laloza
8	141	Naseeb Nawaz Khan	GPS Imtiaz Khojaram Khel	GHSS No.2 Bannu
9	176	Abdul Tawab Khan	GPS Master Dilbar Jan Derdariz	GHSS Nurar Bannu
10	178	Muhammad Saboor	GPS Nazar Ali Khan Mandew	GMS Multani Landi Dak
11	186	Khalid Mehmood	GPS Zeba Khel No.1	GMS Jhandu Khel (Farman)
12	190	Abdur Rasheed	GPS Kankai Ghora Baka Khel	GHSS No.2 Bannu
13	194	Nasr Ullah Jan	GPS Landidak	GHSS Ismail Khel
14	200	Haji Sami Ullah	GPS Kotka Feroz	GHSS Koti Sadaat
15	236	Ayub Khan	GPS Nar Dilasa Shah	GHSS Jhandu Khel
16	242	Syed Muhammad Zahir Shah	GPS Kas Kala Behram Shah	GHSS No.2 Bannu
17	251	Muhammad Qasim Shah	GPS Tooth Ghari Mira Khel	GMS Ghajan Ismail Khani

M. N. D.

Attested

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18	253	Murad Ali Khan	GPS Bhangi Khan Khujari	GMS Abdul Qadeer Shah Mandan
19	258	Zafar Iqbal	GPS Taziri Bizen Khel	GHS No.2 Bannu
20	282	Hashim Khan	GPS Dil Nawaz dad Kachkot	GHS Hebak Sherza Khan
21	286	M. Mukaram Khan	GPS Noor Shad Ullah	GHSS Mamash Khel
22	296	Farid Ullah Shah	GPS Naimat Sardi Khel	GMS Atlas Khan Beri Khel
23	299	Afsar Ali Khan	GPS Kotka Ayub Rahman	GMS Dil Nawaz Dad Kachkot
24	300	Naik Nawaz	GPS No.4 Bannu City	GHSS Lalozai
25	304	Muhammad Farid Khan	GPS Amandi Shekh Amir	GMS Amandi Shah Jehan (Shah Niaz)
26	312	Muhammad Ghani Khan	GPS Hafiz Noor Shad Ullah Shah	GHS Seru Bada Khel
27	318	Sher Ghazi	GPS Sabo Khel Khatak	GHS Ganji Daud Shah
28	331	Sana Ullah Khan	GPS Degan Shadi Khan	GHSS Lalozai
29	343	Zulqarnain Ali Shah	GPS Master Issaki Shekhan	GHSS Bannu
30	347	Sher Dar Ali	GPS Hafiz Noor Shad Ullah Shah	GHS Bazar Ahmad Khan
31	353	Bakhtiar Ali Khan	GPS No.1	GHS No.3 Bannu
32	364	Alam Zeb Khan	GPS Jadid Abadi Behram Shah	GHS No.3 Bannu
33	371	Nazir Rahman	GPS Haqqad Sra Derga	GHS Musa Khan Jani Khel
34	373	Karam Ali Khan	GPS Mulani Landi dak	GMS Hassan Khel Kheraki
35	390	M. Habib Khan	GPS Sardar Mandew	GHS No.1 Bannu
36	404	Inam Ullah	GPS Gulap Khel Murghali	GMS Dowmanza Bizen Khel
37	414	Gul Bilawar Shah	GPS Pir Khel Kakki	GHS Fazal Mitha Khel
38	418	Javed Iqbal	GPS Kachkot Asad Khan	GHSS Lalozai
39	422	Ismail Khan	GPS Saleh Khan Fazal Haq Malwana	GHS Sikandar Khel Bala
40	428	Sayed Roshan	GPS Mir Baz Barakzai	GHS Ghulalm Jan Baka Khel
41	441	Rabiaz Kharr	GPS Masoori Gul Badan Shah	GHS Mandew
42	451	Irfan Ullah	GPS No.1 Bannu City	GHS No.2 Bannu
43	466	Arshad Zahoor	GPS Shahbaz Azmat Khel No.1	GMS Gambar

Ahmad

Attested

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44	488	Muhammad Rasool Khan	GPS Shamadi Kala	GHS No.2 Bannu
45	588	Naseer Ullah Khan	GPS Saeed Tughal Khel	GHS Mandan Bannu
46	532	Akbar Jan	GPS Kotka Sherzad	GMS Hussain Khel Essaki
47	534	Shafi Ullah Khan	GPS Bhangal Khel Dilawar Khan	GHS Jan Killa Suurani
48	548	Maqsood Khan	GPS Niaz Bada Mir Abass	GHS No.1 Bannu
49	571	Abid Ullah Anwar	GPS No.1 Bannu City	GHS No.3 Bannu
50	572	Ghulam Riaz Khan	GPS Shabaraz Mandew	GHS Mandew
51	573	Gul Naib Khan	GPS Rab Nawaz Barakzai	GMS S.K Bala

Note:-

- 1- No TA/DA is allowed.
- 2- Charge report should be submitted to all concerned.
- 3- Promotion is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO(M) Bannu. Expenditure on verifications will be borne by the appointees.
- 4- He should join his post within fifteen days of the issuance of this notification. In case of failure to join the post within stipulated period, his promotion will stand expired, automatically and no subsequent appeal etc shall be entertained.

(Signature)
DISTRICT EDUCATION OFFICER
(MALE) BANNU

Endst: No 15116-15223 /AE-II/CT

Dated: 15 /12 /2014

Copy for information and necessary action to:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Bannu.
3. The PS to the Secretary to Govt of Khyber Pakhtunkhwa E&SE Department.
4. The Head of Institution Concerned Schools.
5. Sub Div: Education Officer (Male) Bannu.
6. The Accountant Middle Schools (Male) Local Office.
7. The Teacher concerned.
8. EMIS Bannu.
9. Master File.

(Signature)
DISTRICT EDUCATION OFFICER
(MALE) BANNU

Attested

(Signature)



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938, 9210407, 9210957,
9210468, 0800-35857 Fax: 091-9210936,
E-mail: rafiq_kk857@yahoo.com

No. 06 / Management Cadre / Estab
Dated Peshawar the 02/06/2014.

To

The District Education Officer,
(Male) Bajaur.

Subject: OBSERVANCE OF PROMOTION QUOTA OF PRIMARY SCHOOL TEACHERS.

Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department notified Service Rule for Teaching Cadre in consultation with the Establishment Department and the Finance Department under 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, and laid down the method of recruitment for the following posts vide Notification No. , No.SO. (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Peshawar dated the November 13, 2012 which is reproduced below:-

S No	Nomenclature of the post.	Minimum qualification and experience for Initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.	18 to 35 years.	(a) Forty per cent by initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years' service and having qualification prescribed for initial recruitment of Certified Teacher (General); Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years' service and having qualification prescribed for initial recruitment of Certified Teacher (General). Note: In case of non-availability of suitable person for promotion, then by initial recruitment.
2.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years' service and having qualification prescribed for initial recruitment of Drawing Master; Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years' service and having qualification prescribed for initial recruitment of Drawing Master

Attested



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938, 9210437-9210957,
9210468, 0800-33357 Fax: 091-9210936,

E-mail: rafiq_kk851@yahoo.com
No. 66 / Management Cadre / Estab

Dated Peshawar the 22/06/2014.

To

The District Education Officer,
(Male) Bannu.

Best Copy

Subject: OBSERVANCE OF PROMOTION QUOTA OF PRIMARY SCHOOL TEACHERS.

Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department notified Service Rule for Teaching Cadre in consultation with the Establishment Department and the Finance Department under 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, and laid down the method of recruitment for the following posts vide Notification No., No.SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Peshawar dated the November 13, 2012 which is reproduced below:-

S No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.	18 to 35 years.	(a) Forty per cent by initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years' service and having qualification prescribed for initial recruitment of Certified Teacher (General). Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years' service and having qualification prescribed for initial recruitment of Certified Teacher (General). Note: In case of non-availability of suitable person for promotion, then by initial recruitment.
	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years' service and having qualification prescribed for initial recruitment of Drawing Master. Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years' service and having qualification prescribed for initial recruitment of Drawing Master.





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FORM NO. 1216/85

2 Jun. 2014 2:30PM P2

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

In District Bannu, the following numbers of posts were lying vacant and which were to be filled in the following manner specified in the Rules as stated above.

SNo	Detail of Vacancies	CT	DM	PET
1	Total Vacancies were to be filled	74 ✓	29	26
2	Promotion Quota	44	6	5
3	Initial Recruitment Quota	30	23	21
Total Advertised Posts for initial recruitment		74	29	26

Keeping in view the above, immediately meeting of Departmental Promotion Committee be called and their promotion may be ensured against the available vacant posts of CT, DM and PET, which are not advertised. Further in future no post may be advertised for initial recruitment until their promotion quota is not fully observed.

Muhammad Rafiq Khattak
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Attested

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Amir K



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)/E&SED/5-1/General /2015
Dated Peshawar the 20-02-2015

To,

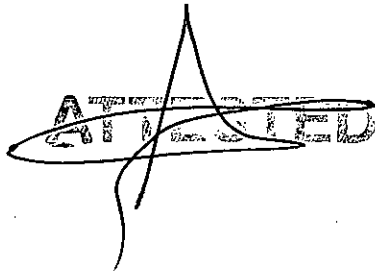
The Director,
E&SE Peshawar.

Subject: - **Appeal for promotion from SPST to CT (Agriculture).**

I am directed to refer to the subject noted above and to enclose herewith an appeal from Mr. Ihsan Ullah Khan s/o bade Uz Zaman SPST, Kacha Bachak Ghurewala District Bannu which is self Explanatory, forwarded for further necessary action as per rules/policy.

Encl above:-


(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)


ATTACHED

خدمت جناب سیکرٹری صاحب محکمہ ایلنمنٹری اینڈ سیکنڈری ایجوکیشن ایسٹون

14/12/2014 DEESE عنوان: اپیل برائے پروموشن SPST سے سی ٹی زراعت

1-2/Bannu

Annex - L جناب عالی

11/11/15
11/11/15
11/11/15

خود بانہ گزارش ہے کہ فروری 2015 میں ایڈیشنل کالج ایسٹون سے سی ٹی زراعت کا کورس مکمل کیا ہے۔

ضابطہ والد ضمیمہ نمبر 1 میں سی ٹی زراعت کی آئی ایس ایس عمر حد درجہ حافی میں

بالنسب کے مطابق سی ٹی زراعت کی خالی ایس ایسوں پر 2015 PST سے پروموشن اور 40

Initial Recruitment ہوگی۔ درج ذیل بالنسب میں سی ٹی کے حافیوں Categories

SPST DSA

کے پروموشن اور کیری کا علیحدہ علیحدہ اندراج ہے۔

جناب والا! 24/11/2014 کو ضمیمہ نمبر 1 میں SPST سٹیگ منظور ہوئی اس میں

سی ٹی کو پروموشن سونپی گئی۔ لیکن ڈائریکٹر صاحب کا آرڈر لیٹر جو صرف ضمیمہ نمبر 1 کو

ارسال کیا ہے اس لیٹر نے ہر ایک کو خالی اور ہمیں رضامت نہ دلا۔ یعنی ہم سی ٹی میں

پروموشن سے محروم ہو گئے۔

لہذا جناب کی فرمائش سے متعلق ہے کہ ڈائریکٹر صاحب کو اطمینان بخاری کی جائے

کہ بالنسب کے مطابق ہمیں رضامت دے دیں۔ عین گزارش ہوگی۔

Govt. of Punjab
Elementary & Secondary
Education Department

S.A. Dity No. 149

11/11/15

Ministry of Education
Education Department

S.A. (A) Dity No. 2692

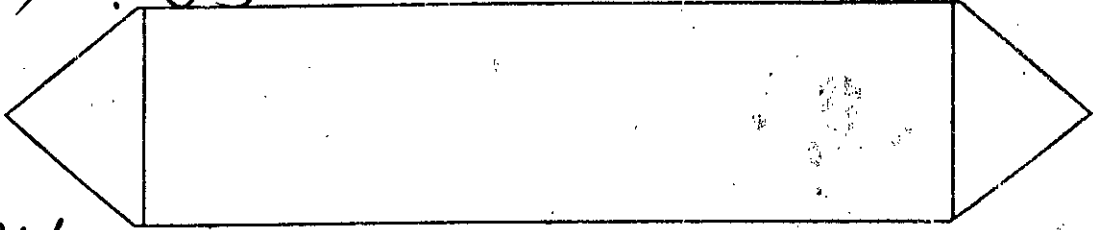
6.1.15

اصحان اللہ خان ولا برائے الزمان SPST ضمیمہ نمبر 1

ATTACHED



بعدالت جناب سروس ٹریبونل لیسٹاؤر



2015ء پنجاب ایڈوائس
احسان اللہ خان نام حکومت

مورخہ
مقدمہ
دعویٰ سروس ایپل
جرم

باعث تحریر آنکہ

آن مقام لیسٹاؤر کیلئے اے صف علی شاکہ / حسن اللہ خان کی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زراہیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی ہنملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند رہے۔

انرقوم 09 ماہ اگست 2015

کے لئے منظور ہے۔

Accepted
Author

لیسٹاؤر

Accepted
[Signature]

بمقام

Service Appeal No: 340/2015

Ihsan Ullah Khan, Bannu.

...Appellant

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others. Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No:1-4.

Respectfully Sheweth :-

The Respondents submit as under :-

Preliminary Objections

- 1 That the Appellant has got no cause of action / locus standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the Service Appeal is bad for mis joinder & non joinder of necessary parties..
- 5 That the Appellant shall be promoted on his own terms after full filling the codal formalities.
- 6 That any category of candidate can be promoted to the post of CT. Hence the appeal is liable to be dismissed.
- 7 That the appellant is going to waste to the valuable time of this Honorable Tribunal as well as Govt: functionary bodies.

ON FACTS

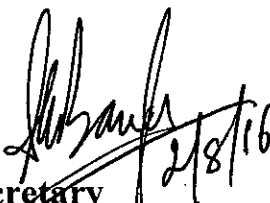
- 1 That Para-I, pertains to appellant record.
- 2 That Para-2 is also pertains to appellant personal record.
- 3 That Para-3' pertains to office record. However it is relevant to mention here that appellant Gualp Naz PST & Abdus Salam PST whose service appeal bearing No: 341 & 342/ 2015 are pending for adjudication have been promoted to the post of CT on their own turn as well as seniority cum fitness. ~~The appellant shall also be promoted to the post of CT on his own turn & seniority, according to rules on the subject.~~
- 4 That the Para of the appeal pertains to official record.
- 5 That the Para of the appeal pertains of the official record for detailed reply see Para-3 of the facts.
- 6 That the Para pertains to record. However, the appellant would be promoted to the post of CT amongst other on his own turn.
- 7 Incorrect. All the posts have been filled either in shape of new appointments through NTS or through promotion.

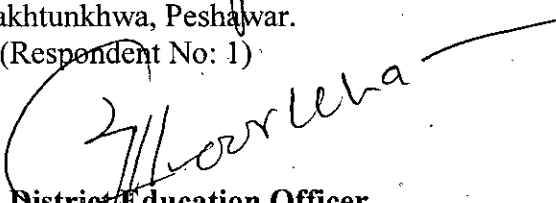
- 8 Incorrect. The appellant is yet junior comparatively to other candidates. Hence could not be promoted to the post CT.
- 9 Incorrect. That as replied in above paras.
- 10 Incorrect. That the promotions are made in General not in particular.
- 11 Incorrect. The Respondents act in accordance of law & rules.
- 12 That the appellant has got no cause of action of file instant appeal.


GROUNDS

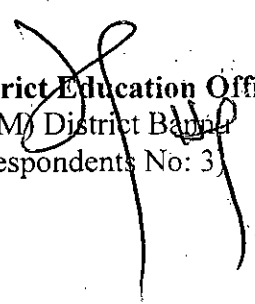
- A That Ist Para is relevant with appellant personal record. However no discrimination is done with appellant.
- B Incorrect. Respondents have not acted against the rules & policy . However the appellant would be promoted to the post CT amongst other on his own turn.
- C Incorrect. See above paras of the fact for detail.
- D Incorrect. Neither fundamental rights of the appellant have been violated, nor the Respondents have ill-will or personal grudge with the appellant.
- E Incorrect. Since the appellant is junior amongst other candidates have would be promoted to the post of CT in coming promotion process wherever the posts fall vacant.
- F Incorrect. Respondents exercise powers in accordance of law, rules & policy of the Govt:
- G correct. That appellant has got constitutional rights to be treated as according to law, while the Respondents have not done any discrimination with the appellant.
- H Incorrect. As replied in above paras.
- I That the appellant has got no cause of action to file instant appellant.
- J That the Respondents reserve the right to advance other points at the time of final hearing of the instant appeal.

It is therefore, very humbly prayed that on acceptance of these Parawise Comments / reply in response to Service Appeal No: 340/2015, this Honorable Tribunal may very graciously be pleased to dismiss the same with heavy costs through out.


Secretary
(E&SE) Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


Dy: District Education Officer
(M) District Bannu
(Respondents No:4)


Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar


District Education Officer
(M) District Bannu
(Respondents No: 3)

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No.340/2015

Ihsan Ullah.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

APPLICATION FOR GRANT OF PERMISSION TO
DEPOSIT THE SECURITY AMOUNT/SERVICE
CHARGES.

Respectfully Sheweth!

The petitioner most humbly submits as under:-

1. That the above cited appeal is pending adjudication before this Hon'ble Tribunal which is fixed for 31/07/2015.
2. That on the previous date of hearing the petitioner was directed to deposit the security amount.
3. That the clerk of petitioner was busy in his LLB examination and the petitioner was in the impression that the amount has been deposited but due to clerk examination the same was not deposited, hence, this application.
4. That the delay was not intentional but due to the aforementioned reason.
5. That for the safe administration of justice there is no legal embargo for allowing this application.

Appellant / Petitioner

Through:

Asif Ali Shah
Advocates High Court,
Peshawar

Nk
13.07.15