



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

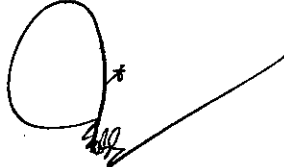
05.07.2022

Counsel was informed telephonically for the date fixed due to non-availability of postal tickets

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.



(Farrecha Paul)
Member(Executive)

(Kalim Arshad Khan)
Chairman

06.08.2021

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)

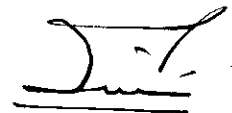
15.12.2021

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)



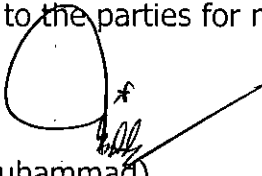
(Salah-ud-Din)
Member (J)

30-3-2022 Proper DB not available the case is adjourned to come up for the same as before on 5-7-2022


Ready

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)

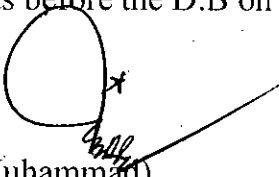

Chairman

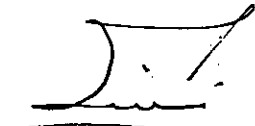
16.02.2021 Due to Pandemic of Covid-19, the case is adjourned to 27.05.2021 for the same.


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. 341/2015

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

Learned 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

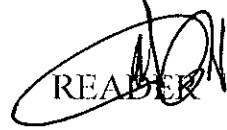
09.12.2019

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.

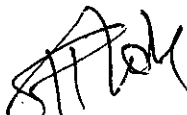

Member



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

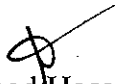

(Muhammad Hamid Mughal)
Member

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.

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



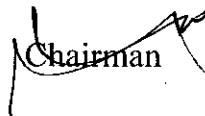
(Muhammad Hamid Mughal)
Member

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

Counsel for the appellant 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

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





Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 341/2015

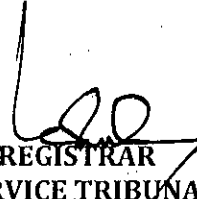
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	17.04.2015	<p>The appeal of Mr. Abdus Salam resubmitted today by Mr. Asif Ali Shah Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: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

The appeal of Mr. Abdus salam son of Abdul Waheed khan PST GPS. 1 Bannu City 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 appellatant 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. 496 /S.T.

Dt. 15/4/2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asif Ali Shah Adv. Pesh.

Respected Sir

The case is resubmitted after necessary correction, may kindly be fixed before the Honble Bench.



Advocate

Dated: 17/04/2015

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. 341 /2015

Abdus Salam.....Appellant

Versus

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

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8	Sanction Posts	F	23-
9	Seniority List	G	24
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Appellant
Through:

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

Dated: 09.04.2015

11

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

Appeal No. 341 /2015

Abdus Salam S/O Abdul waheed khan
PST, GPS BNO.1 Bannu City, District Bannu.

**N.W.F. Province
Service Tribunal
Diary No. 337
Dated 13-04-2015**

_____ Appellant

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 (M) Bannu, *Edu* **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**

Re-submitted to-day
and filed.

13/4/15

ITS TRUE LETTER AND SPIRIT AND ALL ACTS 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:02.03.2015 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.

Asif Ali Shah
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

ca 67

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. _____/2015

Abdus Salam.....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.



[Handwritten Signature]
Deponent

"7"

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. _____/2015

Abdus SalamAppellant

Versus

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

ADDRESSES OF THE PARTIES


APPELLANT

Abdus Salam S/O Abdul waheed khan
PST, GPS BNO.1 Bannu City, District 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

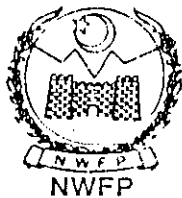
Through: 

Asif Ali Shah
Advocates High Court,
Peshawar

S.No. 3018

u 8¹ Annex - A-3

Departmental Examinations Schools & Literacy Department, NWFP



DETAILED MARKS CERTIFICATE

Name Abdul Salam Training Classes Examination CI (AGRO. II CH.)

Session 2003

Father's Name Abdul Wahed

Roll No. 18

Subject	Maximum Marks	Marks obtained		
		Internal	External	In words
1. Islamic Values and Pak. Ideology	100			50
2. Agr. Tech. Edu: in Pakistan	100			66
3. Developmental Psychology	100			67
4. Job Analysis and Skill Developmental	100			67
5. Methods of Teaching and Development of Instructional Material	100			75
6. Workshop School from Planning and Management	100			68
7. Student Evaluation and Guidance	100			57
8. Teaching Drawing	100			—
9. Fundamental of Wood Work, Metal Work and Electricity	100			—
10. Industrial Arts Workshop Pract.	300			—
11. Tech: Practical in Industrial Arts:	200			—
12. Drg: Lay out and Land Surveying	100			60
13. Fundamental of Agr:	100			66
14. Agr: Workshop Farm Practical	300			198
15. Tech: Practice in Agr:	200			134
16. Drg: Design and Drafting	100			
17. Fundamental of Home Ecos:	100			
18. Home Eco. Workshop Practice	300			
19. Teaching Practice in Home Eco:	200			
Total	2800 1400			908

Note: Errors/omissions excepted.

Failed/Passed _____ Division T-1

Prepared by _____

Checked by Department _____

Date of Declaration of Result _____

Deputy Director (Examination),
 Schools & Literacy Department,
 N.W.F.P., Peshawar.

Attested
ATTESTED



S.No: 21778

University of Science & Technology, Bannu

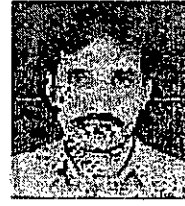
N.W.F.P (Pakistan)

Detailed Marks Certificate

MA Islamiyat(Annual) (Master in Islamiyat (Annual)) 2006-2008

Annual Examination 2009

None



Name: Abdus Salam Father's Name: Abdul Waheed

Roll No: 1947 Reg. No: 2006-UB-BP-6154

The candidate has secured the following marks and is placed in 2nd Division

S U B J E C T S	M A X I M U M M A R K S				M A R K S O B T A I N E D					
	Theo	Inter	Prac	Total	Theo	Inter	Total	Prac	Total	in Words
Al-Fiqah	100		---	100	48	0	48	---	48	FORTY-EIGHT
Im ul Kalam	100		---	100	40	0	40	---	40	FORTY ONLY
Maqabul e Adyan	100		---	100	42	0	42	---	42	FORTY-TWO
Islam aur Jadeed Maghashee Wazaryat	100		---	100	48	0	48	---	48	FORTY-EIGHT
Islami Akhlaq aur unka Tasawar	100		---	100	57	0	57	---	57	FIFTY-SEVEN
Al-Fa Voce	100		---	100	60	0	60	---	60	SIXTY ONLY
Previous			---	500			---		219	TWO HUNDRED NINETEEN
Total				1100					514	FIVE HUNDRED FOURTEEN

Errors & omissions if any are subject to subsequent rectification

The Examination was taken In Parts

Pass 33% Marks in each Subject (Written & Practical Separately) & 36% Marks in Aggregate

Prepared by: [Signature]

Checked by: [Signature]

Attested
[Signature]
Lecturer
Govt. Post Office
Bannu

Controller of Examinations
University of Science & Technology, Bannu

Result Declaration Date	06-01-2010
Issue Date	06-01-2010

Attested
[Signature]

107

Annex - B



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated the November 13, 2012

No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre

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

ndsl. 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.

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

AHCSA-01

92

2

- 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)



12

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 Tanzimutul 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 Tanzimatul 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: Note: 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

		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		(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).
14.	Certified Teacher (Industrial Arts) (BPS-15).	(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 (b) Bachelor's Degree from a recognized	18 to 35 years.	Note: In case of non availability of suitable person for promotion, then by initial recruitment. (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

34

		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).
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	18 to 35 years.	Note: In case of non availability of suitable person for promotion, then by initial recruitment. (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):
		(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or		
		(iii) Bachelor's Degree from a recognized		Provided that if no suitable candidate is available amongst the

~~APPROVED~~

		any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		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 (Agriculture).
16.	Certified Teacher (Home Economics) (BPS-15).	<ul style="list-style-type: none"> (i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center; or (ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or (iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or (iv) Bachelor's Degree, from a recognized 	18 to 35 years.	<p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p> <ul style="list-style-type: none"> (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 as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics): <p>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</p>

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Annex - C

205

12/7/13

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the April 24, 2013.

No. SO(PS)s-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 Shatebatul Alia Fil Uloomul Arabia wal Islamia from Tanzimatul 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."

~~ATTACHED~~

Section Officer (Primary)
Elementary and Secondary
Education Deptt.
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 Tenzimiatul Wafaqul Madaris / Madaris recognized by Higher Education Commission or Darul Uloom Saifu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government 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.

~~ATTACHED~~

~~Against serial No. 5, 6 and 8 the existing entries shall respectively be deleted.~~

Section Officer (General)
Elementary and Secondary Education
Khyber P. Khunjerabad

(18)

18

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, ESSE 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 (MRF) 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 ESSE Khyber Pakhtunkhwa Peshawar.
21. PS to Secretary ESSE Khyber Pakhtunkhwa Peshawar.
22. Master file

(HINA SAIED)
26-4-2013

SECTION OFFICER (PRIMARY)

Khyber Pakhtunkhwa

ATTACHED

(2)

Yours faithfully,

درجہ اولیٰ میں مطلوب ہیں

حکومت گلگت بلتستان میں شہرہ آفاق اور معزز اداروں کی خدمات میں شمولیت کے لیے طلبہ کو درجہ اولیٰ میں شمولیت کے لیے درجہ اولیٰ میں شمولیت کے لیے...

Table with columns: No, Post Name, Qualification, Age Limit, etc. Includes posts like CT, Industrial, Agriculture, DM, PET, AT, TT, PST, BPS-12, BPS-7, BPS-11.

Table with columns: Post Name, No. of Posts, etc. Lists various posts and their respective numbers.

نوٹ: 1. ہر کاندیدہ کو اپنی شمولیت کے لیے درجہ اولیٰ میں شمولیت کے لیے...

www.khyberpaktunkhwa.com INF(P)01

Reference vide Published in the News etc. dated of different items. The items at ser/ Screen it should!

www.khyberpaktun

2012-13

Table with columns: Year, Amount, etc. Shows financial data for 2012-13.

Table with columns: Year, Amount, etc. Shows financial data for 2013.

Table with columns: Year, Amount, etc. Shows financial data for 2013.

Table with columns: Year, Amount, etc. Shows financial data for 2013.

www.khyberpaktun





20

Annex-E

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) PRIMARY BANNU.

No. 684

Dated 15/2/2014

To

The Director,
Elementary & Secondary Education (M),
KPK Bannu.

SUBJECT: **GUIDANCE**

Memo;

The self explanatory demands of APTA District Bannu is forwarded for guidance in order to solve the issue once for all.

Handwritten notes:
DEOM Bannu
Being at appointment authority
Salva Thuy at 2 years level the
Suleh very full much clear
and follow the full clear

Signature: [Signature]
District Education Officer
(M) Bannu.

Stamp:
District Education Officer
(M) Bannu

ATTESTED

27

22

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA.

No. 123 /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.

Endst: No. _____

[Signature]
Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar:
71

Copy forwarded to the:

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

APR-I/M-S
For necessary action under the Rules/policy
[Signature]

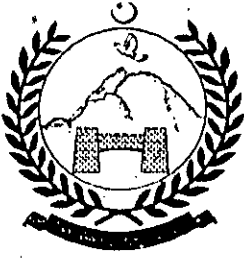
1730 (100)
14/11

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

RECEIVED
[Signature]



"22"



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 futher necessary action and report.

Encl: As Above:

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

~~AFFECTED~~

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
		1	NO -----do----- Dated 8.8.1982
2.	GHS Azim Killa ✓	1	NO SOE(iii)2-2/80 Vol xlii dated 1.8.1980
3.	GHS Jando Khel ✓	1	NO SOE(iii)2-2/80 Vol xxi Dated 1.8.83
4.	GHS Ismail Khel ✓	1	NO SOE(iii)2-2/80 (B) dated 7.1.80
		1	NO SOE(III)2-2/80 (A-Vol xxx dated 25/8/84
5.	GHS Bazar Ahmad Khan	1	NO SC-Ix/52-60 fated 24.1.1962
		2	NO SOE(iii)2-2/80 vol xxv dated 1.8.1983
6.	GHS Nar Shakrullah ✓		NO SOE(III) 2-2/80 (E) Dated 7.11.1990
7.	GHS Kotka Muhammad Khan ✓	1	NO SOE(III) 2-2/80 dated 30.8.1986
8.	GHS Rakki ✓	1	NO SOE(III) 2-2/80 Dated 30.8.1986
9.	GHS Domel	1	NO SOE(III) 2-2/80 dated 15.10.88
		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 of WP No SC-ix-5/47-60 dated 20.2.1962
14.	GHS Mamash Khel ✓	1	No 6624-32 Dated 16.10.98
15.	GHS Bannu	1	No 7856/HE/8/21 Dated 11.4.55
16.	GHS BO. I Bannu	2	
17.	GHS NO 2 Bannu ✓	3	No-501X-6/55-61 Dated 24.1.62, 14.7.85
18.	GHS Kotka Ayaz	3	
19.	GHS Sero Bada Khel	1	No, SOE(III) 2-2/80 Dated 14.7.85

① پندرہ گھنٹہ گیس
 ② پندرہ گھنٹہ گیس
 ③ پندرہ گھنٹہ گیس
 ④
 + 33 = 33
 30

Executive District Officer
 Schools & Literacy Bannu

Total
 30
 1
 31
 2
 33

2. GHS S.K. Bala

No, SOE(III) 2-2/80 Dated 14.7.85



سی۔ٹی۔ ایگریکلچر

4242

Annex - G

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		Acemic 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	

Sub Divisional Education Officer (Male) Bannu

[Handwritten signature]

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (میل) بنوں۔

Annex- H

اشتہار میں سی ٹی ایگریٹو ٹیک کو مشتہر کرنا۔

عنوان:-

جناب عالی!

گزارش 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 لیسٹ کے مطابق ان کی تقرریاں ہو چکی ہیں۔

لہذا گزارش 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, E. P.
For n. a. n. a.
The n. a. n. a. / P. n. a.

3.9
ary To Minister for
Secondary Education
Lahore

ATTACHED

خدمت جناب سیکرٹری صاحب ایگزیکیوٹو انڈسٹری ایجوکیشن سیکرٹریٹ



عنوان درخواست برائے پروموشن PST سے سی ای زراعت

11

جناب عالی!

خود بانہ گزارش ہے کہ ضلع نون میں سی ای زراعت کی چھ اسٹاپس خالی ہیں۔ بالسی 2012
کے مطابق سی ای زراعت کی حالی اسٹاپس میں 60 PST سے پروموشن اور 40 initial recruitment
جناب والا! 24/11/14 کو ضلع نون میں DPC منعقد ہوئی۔ اس وقت میں بیماری سے پروموشن ہوئی تھی
لیکن ڈائریکٹر صاحب کی ایک لیٹر جو 26/12/14 کو صرف ضلع نون کو احتجاج کے ذریعے ارسال کیا
اس لیٹر نے ہریکٹائی کیونکہ اس میں سی ای کے دیگر categories کو نظر انداز کیا ہے
اور صرف سی ای جنرل کا ذکر کیا ہے۔ جو کہ بالسی کے برخلاف ہے۔

جناب والا بالسی بالکل واضح ہے۔ نہ اس کے بعد کوئی اور بالسی آئی ہے۔ اور نہ اس میں کوئی
ترمیم ہوئی ہے۔ اس بالسی پر سیکریٹری کا علیحدہ علیحدہ پروموشن اور کھڑی کا طریقہ دینا ہے۔

لہذا جناب کی خدمت میں کہتا ہوں کہ بالسی کے مطابق ہمیں رینا حق دیا جائے۔ اور 60
کے حساب سے پروموشن کا حکم جاری کیا جائے۔ تمام نقول لف میں۔ تمام زراعت کا ذکر
سیریل نمبر کا ہے۔

5/12/2014

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8/12/14

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① گلاب ناز SPST (2) اصمان اشدان SPST (3) عبدالسلام SPST ضلع نون

1890
5/11/14
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ATTESTED

حضرت جناب ڈاکٹر بلکہ صاحب ایڈیٹمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

عنوان: PST سے سی ٹی زراعت کے پوسٹوں پر پروموشن

جناب عالی!

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

جناب والا! ایسی کے مطابق سی ٹی زراعت کے خالی پوسٹوں پر 60 PST سے پروموشن اور 40 فریش NTS کے ذریعے بھرتی ہوگی لیکن DEO صاحب بنوں ایسی سے معذرت 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

میں نوازش ہوگی

مورخہ 11/11/2014

۱۷۵۳۱
ص
۱۱/۱۱/۱۶

اعجاز عثمان

سید محمد علی صاحب

① عرفان اللہ PST (2) گلاب ناز PST (3) احسان اللہ PST 11/11/14

ضلع بنوں

ATTENDED

حکومت جناب قیامی اور صاحب محمد سعید خان

عنوان: درخواست برائے پرویشن آف پی سی سے لو آف زراعت

صاحب عالی!

جوڈمانڈ لڈاڑی ہے کہ ضلع نون میں آف زراعت کی چھ اسماعیاں جاری ہیں۔ 4 اسماعیوں کا اشتہار DEO مراد علی شاہ نے دیا تھا۔ جن کی آخری تاریخ 25.1.2013 تھی اور ان اسماعیوں پر اب تک کوئی لکھائی عمل میں نہیں آئی ہے۔ اس کے بعد 25.3.2013 کو

فصل منجانب آف زراعت DEO غورالہ سے اور مراد علی شاہ آف زراعت 26.9.14 کو DEO لڈاڑی سے دستاویز ہوئے ہیں۔ اس کے طور پر اسماعیوں کی عملی تعداد چھ تھی ہیں۔

جناب والا، بالخصوص کے مطابق 60 پرویشن Through D.P.C ہوئے اور 40 initial لکھی ہوئی۔

لیجسلاچر جناب کے دفتر میں آئے ہیں۔ کہ بالخصوص کے مطابق 60 کے حساب سے D.P.C کے دائرہ مکمل صاحب کو لکھنا ہے۔ تاہم D.P.C کا انعقاد ہوا ہے۔ لیکن ہمیں ہم عمر سے دراز سے ان اسماعیوں کے حصول کے لئے پھر رہے ہیں۔ اس کے طور پر ہمیں بہ قانون حق مل جائے گا۔

عین نویشن ہوئے۔

تاریخ: 31.10.2014

العارضین

(1) عارف ناز (P.S. Racha Bachak) P.S.T Choniwala

(2) طارق ناز (P.S. Mandew) P.S.T

(3) عمران اللہ (P.S. N03 Banau) P.S.T

ATTESTED

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 PSHT's	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	GHIS No.2 Bannur
9	176	Abdul Tawab Khan	GPS Master Dilbar Jan Derdariz	GHSS Nurur 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	GHIS No.2 Bannu
13	194	Nasr Ullah Jan	GPS Landidak	GHSS Ismail Khel
14	200	Haji Sami Ullah	GPS Kotka Feroz	GHIS Koti Sadaat
15	236	Ayub Khan	GPS Nar Dilasa Shah	GHIS Jhandu Khel
16	242	Syed Muhammad Zahir Shah	GPS Kas Kala Behram Shah	GHIS No.2 Bannu
17	251	Muhammad Qasim Shah	GPS Tooth Ghari Mira Khel	GMS Ghajan Ismail Khani

Form 22

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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 Musar Khan Jani Khel
34	373	Karam Ali Khan	GPS Multani Landi dak	GMS Hassan Khel Kheraki
35	390	M. Habib Khan	GPS Sardad 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 Khan	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

Amir

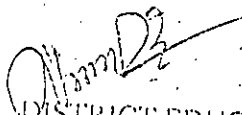
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"30"

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	GHS Hussan Khel Essaki
47	534	Shafi Ullah Khan	GPS Bhangi 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.


DISTRICT EDUCATION OFFICER
(MALE) BANNU

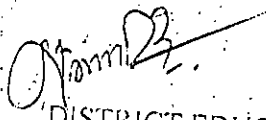
Endst: No 15116-15223


/AE-III/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.


DISTRICT EDUCATION OFFICER
(MALE) BANNU





Directorate of Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938, 9210137, 9210937,
 9210468, 0800-35857 Fax: 091-9210936,
 E-mail: rafiq_kh851@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 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.
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.

ATTACHED

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FRK NO. : 210935

2 Jun. 2014 2:20PM P2

				Note: of non-availability of suitable candidate for promotion, then by initial recruitment.	In case of suitable candidate for promotion, then by initial recruitment.
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

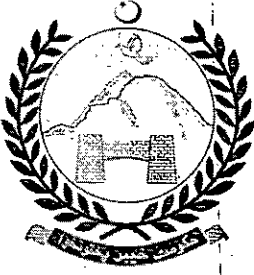
Keeping in view the above, immediately meeting of Departmental Promotion Committee be called and their promotion may be ensured against the available vacant posts of CT, DM and PET, which are not advertised. Further in future no post may be advertised for initial recruitment until their promotion quota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

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

ALLEGED

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ANNA-L



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

No. SO(PE)/E&SED/1-5/Bannu/2015

Dated Peshawar the 02-03-2015

To

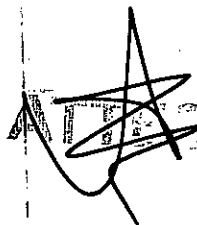
The Director,
Elementary & Secondary Education,
Peshawar.

Subject:- **Appeal 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/appeal, received from Mr. Abdus Salam , PST, GPS BNo.1 Bannu City, District Bannu, for further processing the case as per rules/policy please.

Encl:as above.


(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)


ATTACHED

حکومت جناب سیکرٹری صاحب قلم اعلیٰ سیکرٹری اینڈ سکنڈری ایجوکیشن پشاور

عنوان :- اپیل برائے پروموشن PST سے سی ٹی زراعت

جناب عالی!

مورد نام گذارش ہے کہ فدوی GPS غرا بنوں سٹی میں PST اُستاد ہے

اور 2004ء میں ایگزٹیک کالج پشاور سے سی ٹی زراعت کا کورس

مکمل کیا ہے۔ جناب والا ضلع بنوں میں سی ٹی زراعت کی کئی آسامیاں

عرضہ دراز سے خالی ہیں۔ بالخصوص کے مطابق سی ٹی زراعت کی خالی

آسامیوں پر 60% PST سے پروموشن اور 40% Initial Recruitment

ہوگی۔ مزکورہ بالخصوص میں سی ٹی کے چاروں Categories کے پروموشن

اور ترقی کا علیحدہ علیحدہ اندراج ہے۔

جناب والا 24/11/2014 کو ضلع بنوں میں DPC منعقد ہوئی۔ اس میں

سی ٹی کو پروموشن جُوئی تھی۔ لیکن ڈائریکٹر صاحب کا ایب لیٹر

جو صرف ضلع بنوں کو ارسال کیا ہے۔ اس سے Letter نے بریک ٹگائی

اور ہمیں کہنا ہوتا ہے کہ علاوہ بی بی ایم سی ٹی میں پروموشن سے خرم ہو گئی

یہذا جناب کی خدمت میں استدعا ہے کہ ڈائریکٹر صاحب کو اطلاع

جاری کی جائے۔ کہ بالخصوص کے مطابق ہمیں اپنا حق دینا

میں نوازش ہوگی

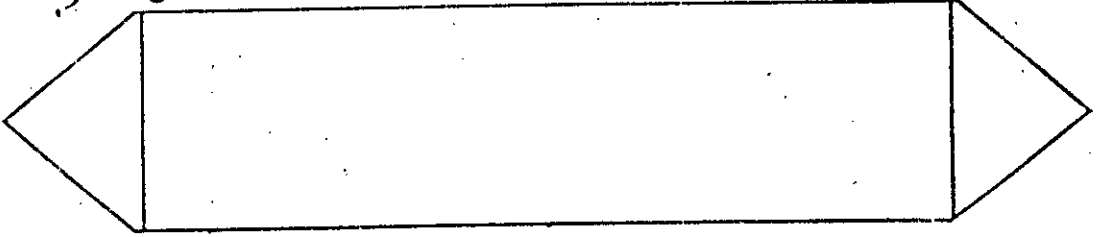
مورم 1-1-2015

150
05/01/15

العارض
A. Saleem
عبد السلام PST-12 GPS-I بنوں سٹی

ATTESTED

بعدالت جناب سرور شہزادہ سید



2015ء پنجاب ایجنٹ
عبدالسلام بنام حکومت

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام سہارن کیلئے آصف علی شاہ / حسن اللہ مگر باقی ایڈووکیٹس
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 ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یک طرفہ 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 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔
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 ہے۔

المرقوم 09 ماہ اگست 2015ء

کے لئے منظور ہے۔

Accepted

Amir

Accepted

Amir

بمقام

سہارن

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No.342/2015

Abdul Salam.....Appellant

Versus

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

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

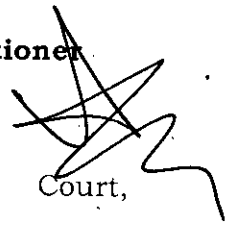
Respectfully Sheweth!

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



ALL
13.07.15

4)

BEFORE THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL PESHAWAR.
SERVICE APPEAL NO. 341/2015

Abdus Salam

Appellant

Versus

Govt: Of Khyber Pakhtoonkhwa

Respondent.

Para wise comments in joint on behalf of respondent's No. 1 to 4

Respectfully sheweth

Preliminary objections on appeal.

- 1- That the appellant has got no cause of action and locus standi.
- 2- That the instant appeal is not maintainable.
- 3- That the service appeal is bad for mis joinder and non joinder of the necessary parties.
- 4- The appeal is time barred hence liable to be dismissed.
- 5- That the appellant shall be promoted on his own turn 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 honourable tribunal as well as Govt: functionary bodies.

FACTS.

- 1- That pertains to appellant record.
- 2- That Para No.2, also pertains to appellant personal record.
- 3- That pertains to office record. However, it is relevant to mention here that appellant Gulap Naz PST and Ihsanullah PST whose service appeal bearing No. 340,342/2015 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 promoted to the post of CT on his own turn and seniority.
- 4- That the Para of the appeal pertains to official record.
- 5- That the Para of the appeal pertains to official record. For detailed reply see Para NO.3 of the facts.
- 6- That the Para pertains to record however the appellant would be promoted to the post CT amongst others 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 of CT.
- 9- Incorrect that as replied in above Para's.
- 10- Incorrect: That the promotion are made in general not in particular.
- 11-Incorrect: respondents act in accordance of Law and rules.

12-That the appellant has got no cause of action to file instant appeal.

GROUNDS.

- A- That 1st Para is relevant with appellant personal record. However no discrimination is done with appellant.
- B- Incorrect: respondents have not acted against the rules and policy. However the appellant would be promoted to the post CT amongst others on his own turn.
- C- Incorrect: see above Para's of the fact for detail.
- D- Incorrect: neither fundamental rights of the appellant have been violated nor the respondents have ill-will or personal grudges with the appellant.
- E- Incorrect: since the appellant is junior amongst other candidates hence would be promoted to the post of CT incoming promotion process whenever the posts fall vacant.
- F- Incorrect: respondents exercise powers in accordance of law, rules and 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 Para's.
- I- That the appellant has got no cause of action to file instant appeal.
- 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 Para wise comments/reply in response to Service Appeal No.341 of 2015 this Honourable Tribunal may very graciously be pleased to dismiss the same with heavy costs throughout.

DISTRICT EDUCATION OFFICER,
(MALE), BANNU

DIRECTOR,
ELEMENTARY & SECONDARY EDUCATION,
KHYBER PAKHTOONKHWA, PESHAWAR.

SECRETARY,
ELEMENTARY & SECONDARY EDUCATION,
KHYBER PAKHTOONKHWA, PESHAWAR

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

2/8/16

BEFORE THE KHYBER PAKHTOONKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO. 341/2015

39

Abdus Salam

Appellant

Versus

Govt: Of Khyber Pakhtoonkhwa

Respondent.

Para wise comments in joint on behalf of respondent's No. 1 to 4

Respectfully sheweth

Preliminary objections on appeal.

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- 3- That the service appeal is bad for mis joinder and non joinder of the necessary parties.
- 4- The service appeal has become time barred hence liable to be dismissed.
- 5- That the appellant shall be promoted on his own turn after full filling the coddle formalities. *code*
- 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 honourable tribunal as well as govt: functionary bodies.

FACTS.

- 1- That pertains to appellant record.
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- 8- Incorrect: the appellants are yet junior comparatively to other candidates hence could not be promoted to the post of CT.
- 9- Incorrect that as replied in above Para's.
- 10- Incorrect: That promotion are made in general not in particular.
- 11- Incorrect: respondents act in accordance of Law and rules.

The appellant has got no cause of action to file instant appeal.