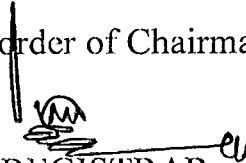


FORM OF ORDER SHEET

Court of _____

Case No. - 1638/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/11/2022	<p>The appeal of Syed Waqar Shah presented today by Mr. Khaled Rehman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

SCANNED
KPST
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1638 /2022

SCANNED
KPST
Peshawar

Syed Waqar Ahmad Appellant

Versus

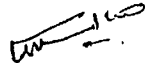
The Govt. of KPK and others Respondents

INDEX

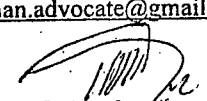
S.No.	Description of Documents	Date	Annex	Pages
1.	Memo of Service Appeal with Affidavit			1-7
2.	Notification/Amendments in Rules		A	8 - 14
3.	Letter by University of Sargodha	28.08.2021	B	15
4.	Result Card		C	16
5.	Instructions of the University of Sargodha		D	17
6.	Impugned order Notification	15.07.2022	E	18
7.	Departmental Appeal/ Representation		F	19 - 25
8.	Wakalat Nama			26

Through


Appellant


Khaled Rahman
Advocate, Supreme Court
(BC# 10-5542)
Khaledrahman.advocate@gmail.com

&


Muhammad Amin Ayub
Advocate, High Court

&


Muhammad Ghazanfar Ali
Advocate, High Court
4-B, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458
Cell # 0313-9040434

Dated: 16 /11/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1638/2022

Syed Waqar Ahmad

SPST, GPS Saad-ud-Din,

Gumbat, District Mardan.....**Appellant**

VERSUS

1. **The Govt. of Khyber Pakhtunkhwa**
through Secretary, Elementary & Secondary Education
Civil Secretariat, Peshawar.
2. **The Director,**
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, G.T. Road, Peshawar. \
3. **The Sub-Divisional Education Officer (Male),**
District Mardan
4. **Mr. Sajjad Ahmad**
SST Bio-Chemistry BPS-16
Office of the Respondent No.3**Respondents**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 15.07.2022 WHEREBY JUNIOR TO APPELLANT WAS PROMOTED TO THE POST OF SST BIO-CHEMINSTRY (BPS-16) AND APPELLANT WAS NOT CONSIDERED FOR PROMOTION ON ACCOUNT OF B.SC. DEGREE AGAINST WHICH HE FILED DEPARTMENTAL APPEAL/REPRESENTATION BUT THE SAME WAS NOT RESPONDED WITHIN THE STATUTORY PERIOD.

PRAYER:

On acceptance of the instant appeal, the impugned Notification dated 15.07.2022 may kindly be set aside and the appellant be promoted to the post SST Bio-Chemistry (BPS-16) on the basis of seniority with all back benefits.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant was initially appointed as PST way back in the year 2006. Since then he has been performing his duties to the entire satisfaction of high-ups and no complaint whatsoever has ever been raised against him during such period.
2. That the Department sought credentials/documents from the appellant and Respondent No.4 for promotion to the post of SST Bio-Chemistry (BPS-16) which were instantly submitted to the concerned quarter. It is pertinent to mention here that as per Notification dated 24.07.2014 by the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, it was held that promotion to the post SST (BPS-16) is to be made from amongst the PSTs who having at least second class Bachelor Degrees from a recognized University on need basis from the following groups with two subjects (Chemistry, Botany & Zoology) (Notification/Amendments in Rules **Annexure:-A**).
3. That appellant being eligible was quite hopeful for his promotion against the subject post but in the meantime unreasonable objection was raised by the official Respondents that the B.Sc. Degree as provided by the appellant is/was fake. The Respondent No.3 wrote a letter to the University of Sargodha for verification which was consequently replied by means of letter dated 28.08.2021 (**Annexure-B**) and the B.Sc. Degree of the appellant was found to be genuine/correct. Since the very objection was no more in field, appellant was once again in hope that he would be promoted against subject post but in vain as he was unlawfully not considered on the ground of NOC/requisite qualification.
4. That it is elucidated that appellant got admission for the B.Sc. Degree in the University of Sargodha as private/casual student in the year 2018 and completed the subject Degree on 07.01.2021 (Result Card **Annexure-C**). In this backdrop of the matter, the qualification/degree acquired by the appellant did not disturb his regular service in the Education Department rather he completed the same as per the instructions (**Annexure-D**) of the University of Sargodha wherein no condition for regular classes has been imposed upon students. It is momentous to aver here that the practical classes of the appellant were held by the said University as casual student in the month of June/July, 2018 and during

this period the Schools were/are closed due to Summer Vacations, therefore, the date and time of Practical classes did not disturb the students' precious time.

5. That appellant was eligible to be promoted to the subject post because he had provided all requisite documents including B.Sc. Degree from the recognized University but inspite of the same he was unlawfully not considered for the requisite promotion without any solid reasons and promoted Respondent No.4 junior to appellant vide impugned Notification dated 15.07.2022 (**Annexure-E**) by utterly disregarding the established rule of seniority. Appellant being disgruntled of the impugned Notification preferred Departmental Appeal/Representation (**Annexure-F**) but the same was not adjudicated within the statutory period of 90 days, hence the instant Service Appeal inter-alia on the following grounds:-

Grounds:

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Articles 4 & 10-A of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully not considered for promotion to the post of SST Bio-Chemistry (BPS-16) and promoted Respondent No.4 junior to appellant vide impugned Notification dated 15.07.2022, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That it is very much visible from the acts and omission and the impugned promotion Notification that the Department illegally wanted to deprive appellant from promotion against the subject post because the first objection in respect of fake degree was removed/clarified from the University of Sargodha but yet another objection was raised in respect of NOC which is unjust, unreasonable and not sustainable in the eye of law.
- C. That appellant is eligible, senior, over and above qualified for promotion to next higher grade but for no valid and justifiable reasons he was not considered for promotion which not only caused financial loss to appellant but also deprived the appellant from his vested right of promotion as well as damaged his career progression. The unlawful omission on the part of the Respondents cannot be justified under any canon of law, justice and fair-play. Reliance is placed on

Judgment 2013 PLC (CS) 786, 1985 SCMR 1158, 2000 PLC (CS) 697, 2021 PLC (CS) 362:

2000 PLC (CS) 697

---Rr.13.18 & 13.20---Punjab Service Tribunals Act (IX of 1974), S.4-- Constitution of Pakistan (1973), Art.4---Anti-dated promotion/confirmation---Entitlement---Civil servant despite being senior was ignored whereas juniors to him were granted anti-dated confirmation/promotion---Service record of junior officers was not better than the civil servant and Authority had not given any valid reason or justification to give the civil servant a different treatment except that powers under Rr.13.18 & 13.20 of Punjab Police Rules, 1934 were discretionary and that Authority in his discretion did not find it fit case to permit period of officiating service to be counted towards period of probation---Powers of exercising discretion vesting in Authority, must be bounded by rules of equity, fairplay and justice and could not be exercised arbitrarily and capariciouly---Failure to treat all like persons in like situations without any reasonable distinction would tantamount to discrimination which was not allowed by law arid discrimination in like situation would offend against Art. 4 of the Constitution of Pakistan (1973) and also would be violative of principles of Sharia.

- D. That appellant being a citizen of the Pakistan can acquire/obtain Degree from anywhere in the Pakistan and no law usurps this right from the appellant. Therefore, appellant provided requisite documents along with B.Sc. Degree for promotion against the subject post but was unlawfully deprived on the ground of NOC. Thus the same is not only against the vested right of promotion of appellant but also against the principle of natural justice because the University of Sargodha addressed a letter dated 28.08.2021 to Respondent No.3 declaring/ verifying the B.Sc. Degree of the appellant to be genuine/correct.
- E. That appellant did not conceal any fact from the Department in respect of the subject Degree. Moreover, as per Section-9 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-7(3) of the Khyber Pakhtunkhwa Government Servants (Appointment, Promotion and Transfer) Rules, 1989, appellant was fully eligible to be promoted against the post of SST Bio-Chemistry (BPS-16) but was unlawfully deprived, therefore, the impugned promotion Notification dated 15.07.2022 is void ab-initio.
- F. That the malafide of the Department towards the appellant is very much visible from the promotion of junior (Respondent No.4) as he was recruited against the post of PST on 21.01.2010 but in the Seniority List of 2015 his date of

appointment was sh be 25.01.2010. It is pertinent to mention here that a Complaint was filed by one Mr. Mehboob Qasim, SPST, GPS Wakilabad, Mardan in an inquiry was conducted and entries in respect of Respondent No.4 in Seniority Lists pertaining to the year 2014 to 2021 were found to be incorrect the Inquiry Report has not been provided to the appellant inspite opeated requests, which clearly suggests official Respondents wanted to mote Respondent No.4 at any cost. Moreover, the so called inquiry was onced and ex-parte as appellant was not associated with it.

G. That Govt. of Khyber Pakhtunkhwa has framed Promotion Policy for the civil servants wherein it was held that:-

"if and when an officer, after his seniority has been correctly determined or after he has been exonerated of the charges or his PER dossier is complete, or his inadvertent omission for promotion comes to notice, is considered by the Provincial Selection Board/Departmental Promotion Committee and is declared fit for promotion to the next higher basic scale, he shall be deemed to have been cleared for promotion alongwith the officers junior to him who were considered in the earlier meeting".

Moreover, Promotion Policy further stipulates the grounds of deferment that where (i) *the inter-se seniority is disputed/subjudice; (ii) disciplinary or departmental proceedings are pending; (iii) PER Dossier etc. is incomplete.* Thus denying promotion to the appellant is neither supported by the law nor the Policy governing the promotion.

H. That the departmental appeal/Representation of the appellant was not taken into consideration by the appellate authority which is in clear contravention of Rule-5 of the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules 1986 read with Section-24A of the General Clauses Act, 1897, as the Departmental Appeal of the appellant has not been decided by the appellate authority. Reliance is placed on 2010 SCMR 511, 2010 SCMR 1475, 2010 SCMR 1778, 2015 SCMR 630:-

2010 SCMR 511

"---S. 24-A---Speaking order---Scope---Public functionaries are obliged to redress grievances of citizens/their subordinates with reasons."

2010 SCMR 1475

—S. 24-A—Speaking order—Scope—Under S.24-A, General Clauses Act, 1897, even public functionaries are duty bound to decide the case after application of mind.

2010 SCMR 1778

“—Each and every public functionary is duty bound to decide cases in accordance with law.”

2015 SCMR 630

“—S. 24A—Executive authority—Discretion, exercise of—Scope—When legislature conferred a wide ranging power, it must be deemed to have assumed that the power would be, firstly, exercised in good faith, secondly, for the advancement of the objects of the legislation, and, thirdly in a reasonable manner—Where the authorities failed to regulate their discretion by the framing of rules, or policy statements or precedents, it became mandatory for the courts to intervene in order to maintain the requisite balance for the exercise of statutory power.”

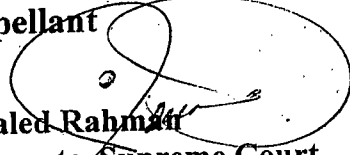
I. **That** appellants would like to offer some other additional grounds during the course of arguments when the stance of the Respondents is known to the appellants.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.


Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellants.

Through



Appellant


Khaled Rahman
Advocate, Supreme Court

&


Muhammad Amin Ayub
Advocate, High Court

&


Muhammad Ghazanfar Ali
Advocate, High Court

Dated: 16/11/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2022

Syed Waqar Ahmad Appellant

Versus

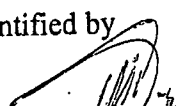
The Govt. of KPK and others Respondents

Affidavit

I, Syed Waqar Ahmad, SPST, GPS Saad-ud-Din, Gumbat, District Mardan, do hereby solemnly affirm and declare on oath that the contents of this Appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

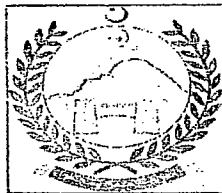

 : Deponent

Identified by


 Muhammad Amin Ayub
 Advocate, Peshawar


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

Peshawar, dated the 24th July, 2014.



NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

A

9

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

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

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent. by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="padding-left: 40px;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

- (c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

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		<p><i>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</i></p> <p><i>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:</i></p> <p><i>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</i></p> <p><i>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:</i></p> <p><i>Provided that if no suitable candidate is available from amongst</i></p>
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**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Endst : of even No & date:

- (4)
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. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
 12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
 13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
 14. All District Account Officer in Khyber Pakhtunkhwa.
 15. All Agency Education Officer in FATA
 16. All Agency Account Officer 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

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)



Ref No: EAC/ED/20/5263
Dated: 15 Aug-2021

Sub Divisional Education Officer (Male) Mardan

SUBJECT: VERIFICATION OF RESULT CARD(S) TRANSCRIPT(S) DEGREE(S)

Kindly refer to your letter application No **996** Dated **16-Aug-2021** regarding subject cited above Copy(s) of Result Card(s) Transcript(s) Degree(s) **Bachelor of Science** of the candidate **Mr. Ms. Syed Waqar Ahmad** Roll No: **31915** is/are correct as per record of this office. The same is/are attached herewith.

Admin Officer (D & V)
For Controller of Examinations



Roll No. 31915

Registration No. 13-U.S.P-20008

PASS RESULT INTIMATION



Name of the Candidate : Syed Waqar Ahmad

Father's Name : Syed Ghulam Rabbi

Institution / District : Mardan

The candidate mentioned above is hereby informed that He / She has PASSED the B.Sc 1st Annual Examination, 2020 held in September-October, 2020 obtaining 372 / 800 marks and has been placed in Second division.

Marks obtained by him / her in each subject are given below:-

Sr. No	Subjects	Detail of Marks			Marks Obtained	Maximum Marks	Remarks
		Theory					
		A	B	C			
1	English (Compulsory) B.Sc	37			37	40	
2	Islamic Studies (Compulsory)	35			35	60	
3	Pakistan Studies (Compulsory)	25			25	40	
4	Botany	15	03	23	41	200	
5	Zoology	31	17	16	64	200	
6	Chemistry	17	25	00	42	200	
Total					372	800	

Note:

This result card is issued as a notice only, errors and omissions excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper Certificate, Degree which will be issued under the Regulations in due course.

Result Declared on 07 JAN 2021

Assistant Controller of Examinations for Controller

Prepared By Computer Cell

Checked By

Name: Syed Waqar Ahmad Roll No: 31915
Father's Name: Syed Ghulam Rabbi
Address: SAADAT CLINICAL LAB NEAR IHSAN MEDICAL COMPLEX SHAMSI ROAD

یونیورسٹی آف سرگودھا

پرائیوٹ امیدواران کیلئے ضروری ہدایت

- (1) داخلہ فارم صحیح طور پر پُر کرنا ضروری ہے۔ داخلہ فارم ہر لحاظ سے مکمل ہونا چاہئے۔ مکمل نام ستر دکر دیا جائے گا۔
- (2) ایسے امیدواران جو امتحان میں پہلی بار شرکت کر رہے ہیں وہ ایسے مضامین جن میں تعداد اور اندر دلوں کو شامل ہیں کا امتحان حصہ لھنا لڈیو کو رس کے مطابق دینے کے قابل ہوں گے۔
- (3) داخلہ فارم کے ساتھ میگزینز شاشتی کارڈ کی صدقہ فوٹو کاپی لف کرنا لازمی ہے۔ بصورت دیگر امتحانات شرکت کی اجازت نہیں دی جائے گی۔
- (4) داخلہ فارم کے محتاطہ کلموں میں اپنا نام اور ولایت انٹرنیٹ کی سڈ کے مطابق صحیح طور پر کریں۔ بصورت دیگر ترمیمیں سے بچ کر انے پر قانون کے مطابق درستی ہوگی۔
- (5) رجسٹریشن کے کام میں سرگودھا یونیورسٹی کارپوریشن برائون کریں۔ اگر پہلے رجسٹریشن نہیں ہوئی تو داخلہ فارم کے علاوہ رجسٹریشن نہیں بھی کر سکتے ہیں۔
- (6) صوبہ پنجاب سے باہر کے مستقل رہائشی امیدواران - 1650/- روپے اضافی سے وہی حدود میں جمع کریں۔
- (7) انٹرنیٹ ڈیاس کے مساوی امتحان پاس کرنے کے عرصہ دو سال بعد لی اسے اپنی ایس سی کا امتحان دیا جاسکتا ہے نیز جرمیڈ اور ان دو سال میں انٹرنیٹ ڈیاس کی امتحان میں ایک مضمون میں ملے ہوئے ہیں اور ملے شدہ مضمون انہوں نے بعد از پاس کیا ہو، کسی امتحان دینے کے قابل ہیں لیکن ان کو داخلہ فارم کے ساتھ انٹرنیٹ ڈیاس کی مساوی امتحان میں ایک مضمون میں ملے ہوئے کے ثبوت کے طور پر اصل میں رزلٹ کارڈ داخلہ فارم کے ساتھ منسلک کرنا ہوگا۔ جرمیڈ اور ان دو سال میں انٹرنیٹ ڈیاس مساوی امتحان میں دو سو سے زیادہ مضمون میں ملے ہوئے ہیں اور ملے شدہ مضمون انہوں نے بعد از پاس کئے ہوں وہی اسے اپنی ایس سی کا امتحان دینے کے قابل نہیں ہیں۔
- (8) ڈیون ایس ایس ایم کے لئے درخواست کرنے کے خواہش مند امیدواران لی اسے اپنی ایس سی پاس کرنے کے ایک سال کے اندر ایک ایک مضمون میں یا مضمون تہہ لی کے تمام مضمون مضمون میں ڈیون ایس ایس ایم کو پاس کر سکتے ہیں۔
- (9) داخلہ فارم کے محتاطہ کلم میں شہر کا نام جہاں امتحان دینا ہے تحریر کریں۔ آپ کے جو کہ شہر میں امیدواران کی مطلوبہ تعداد پوری نہ ہونے کی صورت میں یونیورسٹی کوئی بھی نڈر کی منتزلات کرنے کی اجازت ہے۔
- (10) داخلہ فارم کے محتاطہ کلم میں انٹرنیٹ ڈیاس کا امتحان پاس کرنے کا نام اور ایس اور پورڈ کا نام صحیح طور پر کریں۔ انٹرنیٹ ڈیاس کی سڈ کی صدقہ فوٹو کاپی داخلہ فارم کے ساتھ منسلک کریں۔
- (11) سرگودھا یونیورسٹی سے لی اسے اپنی ایس سی کے امتحان میں شرکت کے بعد ملے ہوئے کی صورت میں فارم کے محتاطہ کلم میں سابقہ دو سال اور ملے شدہ مضمون انٹرنیٹ ڈیاس کی سڈ کی صدقہ فوٹو کاپی منسلک کریں۔
- (12) داخلہ فارم کی مطلوبہ فوٹو یونیورسٹی آف سرگودھا کے منظور شدہ مصیبت بینک کی راج میں جمع کرانیں اور بینک چالان کی اصل میں فارم کی ضرورت ہے۔ فوٹو کاپی قابل قبول نہ ہوگی (واجبات پر جمع نہ کرانے کی صورت میں فارم داخلہ ستر دکر دیا جائے گا۔) (یونیورسٹی آف سرگودھا کی ویب سائٹ سے آن لائن جزیعہ تک چالان ہی قابل قبول ہوگا)
- (13) اگر آپ نے پرنٹنگ مل یا ایسے مضامین کا انتخاب کیا ہے تو اصل پرنٹنگ مل کے داخلہ فارم کے ساتھ منسلک کریں۔ اصل پرنٹنگ مل کے ساتھ سرگودھا یونیورسٹی یا پنجاب یونیورسٹی کے کسی ایسے کالج یا ادارے پر پیشہ دول غیر محتاطہ ہوئے ہیں اور پرنٹنگ مل کے محتاطہ کلم میں اور اس پر واضح رہن ہوگا امیدوار نے بحیثیت مڈلر یا Casualty طلبہ نم پرنٹنگ مل کے ہیں۔ اور پرنٹنگ مل ستر دکر دیا جائے گا۔ اور ہے کہ پرنٹنگ مل کے محتاطہ کلم کے اتمام کے بعد ہونے والے صرف باقی محتاطہ کلمات کیلئے قابل قبول ہیں۔
- (14) لی ایس سی کے امیدواران ستمبر 8 پر موجود ہو کر چیک سے کسی ایک گروپ کا انتخاب کریں۔ ان گروپ چیک کے علاوہ انتخاب کرنے والے امیدواران لی ایس سی کے امتحان کے لیے قابل ہوں گے۔ اور یہ شرکت پر نتائج کی ذمہ داری امیدواران پر ہوگی۔
- (15) جن امیدواران نے منظور شدہ طلبہ علم یونیورسٹی آف سرگودھا یا کسی ایسے کالج میں داخلہ لیا ہو اور اب وہ بطور پرائیویٹ امیدواران یونیورسٹی میں لی اسے اپنی ایس سی کا امتحان دے رہے ہوں تو وہ محتاطہ کلم کا کالج چھوڑنے کا اصل یونیورسٹی جو کہ داخلہ فارم کے ساتھ فوٹو 5 پر موجود ہے لازمی پر کریں اور محتاطہ کلم پر پرنٹنگ مل اور شہر کے ہیڈ سے دستخط کروائیں۔ یونیورسٹی کا کالج چھوڑنے کے کم از کم 10 روپے کے عرصے کے بعد لی اسے اپنی ایس سی کا امتحان دینا جاسکتا ہے۔
- (16) پرائیویٹ امیدواران نے داخلہ فارم کی رقم 17 گروپ کے نام سے تصدیق کرنا ہوگی (تصدیق کنندہ کا شاشتی کارڈ نام اور نام والی ہونا ضروری ہے)۔
- (17) داخلہ فارم میں کسی قسم کی کمی یا غلطی کی صورت میں آپ کو بذریعہ SMS اور Email آگاہ کیا جائے گا۔ لہذا درست موبائل نمبر اور ای میل ایڈریس درج کریں نیز آپ کی رول نمبر ستر دکر دیا جائے گا۔
- (18) ویب سائٹ پر اپ لوڈ کی جانے کی جہاں سے آپ رول نمبر ستر دکر دیا جاسکتے ہیں۔ لہذا امیدواران یونیورسٹی کی ویب سائٹ کو Regularly وزٹ کریں تاکہ آپ کو تازہ ترین معلومات مل سکیں۔
- (19) امتحان کے لیے قابل ہونے کی صورت میں یونیورسٹی کسی بھی قسم کے پرائیویٹ اجراءات کے تسلیم کی ذمہ دار نہ ہوگی۔
- (19) نوٹ: ریگولر امیدواران اپنے متعلقہ کالج کے پرنٹنگ مل سے داخلہ فارم تصدیق کروائیں اور کالج کی وساطت سے داخلہ فارم بھجوائیں۔ بصورت دیگر داخلہ فارم ستر دکر دیا جائے گا۔
- (20) داخلہ فارم جمع کروانے سے پہلے چیک کر لیا جائے کہ اس کے تمام کلم ہدایات کے مطابق درست پر کر لینے گئے ہیں اور مطلوبہ کاغذات، ساتھ لف کر دیے گئے ہیں۔

میں تصدیق کرتا کرتی ہوں کہ میں نے مندرجہ بالا ہدایات اور ضوابط کا انور مطالعہ کر لیا ہے۔

دستخط امیدوار

داخلہ فارم ذاتی طور پر یا بذریعہ رجسٹرڈ ڈاک مندرجہ ذیل پتہ پر ارسال کریں۔

فارم سیکشن

شعبہ امتحانات

یونیورسٹی آف سرگودھا

website: www.su.edu.pk



-18
Promotion of SST of District Mardan
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Anna E

Notification

Consequent upon the recommendation of the Departmental Promotion Committee its meeting held on 6-7-2022 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)2010 dated 16.7.2012, the following PST (Male) is promoted to the post of SST (Bio/Chem) in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A. SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF PST/SPST TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No of Vacant post of SST (Bio/Chem)	3
25% Initial Recruitment Quota	0.75=1
75% Promotion Quota	2
20% PST/SPST Promotion Quota to SST (Bio/Chem)	0.6=1
Proposed CT/SCT for Promotion to SST (Bio/Chem)	1

S.No	Sen#	Name of official	Name of School	D.O.B	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1	1749	Sajjad Ahmed	GPS Shankar Mardan	5/12/1985	21/01/2010	MSc,M.Ed PTC	Services are placed at the disposal of DEO (M) Mardan for adjustment against the post of SST (B/C) BPS-16 on regular basis with immediate effect.

Terms and Conditions:-

- 1 He would be on probation for a period of one year extendable for another one year.
- 2 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 His Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 His Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining the duty.
- 7 He will give an under taking to be recorded in his Services books to the effect that if any over payment is made to them in light this order, will be recovered and if he is wrongly promoted, he will be reversed.
- 8 Before handing over charge, his documents may be checked. If he has not the required relevant qualification as per rules, he may not be handed over the charge of the post.
- 9 Any candidate, who has been promoted on the basis of additional subjects, his promotion is subject to outcomes of HEC.

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 8214-18 / File No.29/SST(M)Promotion Dated Peshawar the: 15/07/2022

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Mardan
3. District Accounts Officer Mardan
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

Deputy Director (Estab-M1)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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Annex F

The Secretary,
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department,
Civil Secretariat, Peshawar.

Through: Proper Channel. (DEPKM) Mardan

Subject: Departmental Appeal/Representation against the impugned Notification dated 15.07.2022 whereby junior to the appellant namely Mr. Sajjad Ahmad was promoted to the post of SST Bio-Chemistry in BPS-16 and appellant was deferred from promotion on the account of B.Sc. Degree.

Respected Sir,

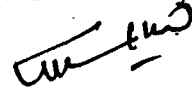
1. That appellant having been appointed as PST way back in the year 2006. Since then he has been performing his duties to the entire satisfaction of his high-ups and no complaint whatsoever has ever been raised against him during such period.
2. That the Department sought credentials/documents from the appellant and promote Mr. Sajjad Ahmad for promotion to the post of SST Bio-Chemistry (BPS-16) which were complied with and submitted to the concerned quarter. It is pertinent to mention here that as per Notification dated 24.07.2014 by the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department. It was held that promotion to the post SST (BPS-16) is to be filled from amongst the PSTs who having at least second class Bachelor Degrees from a recognized University on need basis from the following groups with two subjects (Chemistry, Botany & Zoology) (Notification/Amendments in Rules Annexure:- A).
3. That appellant was eligible and was quite hopeful for his promotion against the subject post but in the meantime unreasonable objection was raised by the concerned quarter that the B.Sc. Degree as provided by the appellant is/was faked. Later on, the University of Sargodha by means of letter dated 28.08.2021 (Annexure-B) which was addressed to Sub-Divisional Education Officer (Male), Mardan, the B.Sc. Degree was found to be genuine/correct. After removing the very objection, appellant was once again in hope that he would be promoted against subject post but in vain and he was unlawfully deferred on the ground of NOC/requisite qualification.
4. That it is elucidated that appellant got admission for the B.Sc. Degree in the University of Sargodha as private/casual student in the year 2018 and completed the subject Degree on 07.01.2021 (Result Card Annexure-C). In this backdrop of the matter, it is submitted that the degree acquired by the appellant did not disturb his regular service in the Education Department rather he completed the same as per the instructions (Annexure-D) of the University of Sargodha wherein no condition for regular classes has been imposed upon a student. It is significant to aver here that the practical classes of the appellant was held by the said University as casual student in the month of June/July, 2018 and during this period the Schools were/are closed due to summer vacations, therefore, the date and time of

- That appellant was eligible to be promoted against the subject post because he had provided all requisite documents including B.Sc. Degree from the recognized University but in spite of the same he was unlawfully deferred from promotion. In this pursuit, it has been stipulated in the grounds of deferment in the Promotion Policy as has been enacted by the Government of Khyber Pakhtunkhwa that where (i) the inter-se seniority is disputed/subjudice; (ii) disciplinary or departmental proceedings are pending; (iii) PER Dossier etc. is incomplete. Thus the non-promotion of the appellant is neither supported by the law nor the Policy governing the promotion.
6. That it is very much visible from the acts and omission and the impugned promotion order that the Department wanted to deprive appellant from promotion against the subject post because the first objection in respect of fake degree was clarified from the University of Sargodha and yet another objection was raised in respect of NOC which is unjust, unreasonable and not sustainable in the eye of law.
 7. That wisdom can be drawn from the letter dated 13.11.2015 (Annexure:-E) of the Higher Education Commission wherein it was held that if a student obtains degree in the private mode in one University and second is obtained from different University, this combination of degrees was allowed. Moreover, it was further held in Condition No.12 that 02 Year Degree (Science) obtained in the regular mode in one University in one Academic session/year and 02 Year Degree (Arts/Social Sciences). The Private/Distance learning mode in the same or different Universities in one academic session/year. This combination of Degree was also allowed.
 8. That appellant being a citizen of the Pakistan can acquire/obtain Degree from anywhere in the Pakistan and no law can usurp this right from the appellant. Therefore, appellant provided requisite documents alongwith B.Sc. Degree for promotion against the subject post but was unlawfully deprived on the ground of NOC. Thus the same is not only against the vested right of promotion of appellant but also against the principle of natural justice because the University of Sargodha addressed a letter dated 28.08.2021 to Sub-Divisional Education Officer (Male), Mardan declaring/verifying the B.Sc. Degree of the appellant to be genuine/correct.
 9. That appellant did not conceal any fact from the Department in respect of the subject Degree. Moreover, as per Section-9 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-7(3) of the Khyber Pakhtunkhwa Government Servants (Appointment, Promotion and Transfer) Rules, 1989, appellant was fully eligible to be promoted against the post of SST (BPS-16 but was unlawfully deprived, therefore, the impugned promotion Notification dated 15.07.2022 is void ab-initio.
 10. That the malafide of the Department towards the appellant is very much visible from the promotion of Mr. Sajjad Ahmad because he was recruited against the post of PST way back on 21.01.2010 but in the Seniority List of 2015 his date of appointment was shown to be 25.01.2010. Likewise in the Seniority Lists pertaining to the year 2014 - 2020, ^{was changed in 2021 list 25/1/2010} in this respect a complaint (Annexure:-F) was filed by one Mr. Mehboob Qasim, SPST, GPS Wakilabad, Mardan against which

be incorrect but the Inquiry Report has not been provided to the appellant inspite of so many requests. Moreover, the Department has inflicted upon appellant a major punishment of reduction to lower post in the shape of misplaced objection of NOC for the subject Degree which is also a hurdle in the way of appellant's future promotion. Furthermore, the sanctity of the B.Sc. Degree was found to be genuine and no question was ever raised by the Department in this regard.

It is, therefore, humbly requested that on acceptance of this Departmental Appeal/Representation, the impugned Notification dated 15.07.2022 may kindly be set aside and the appellant be promoted to the post of SST (BPS-16) on the basis of seniority with all back benefits.

Yours faithfully



Syed Waqar Ahmad
SPST, GPS Saad-ud-Din,
Gumbat, District Mardan.

Dated: 13 /08/2022

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) MARDAN

NOTIFICATION:

Consequent upon the advertisement published in the daily "Mashriq" Peshawar dated: 08/06/2006 and resulted interview held on 27/06/2006 by the District recruitment/selection committee, the undersigned being competent authority is pleased to appoint/approve the following PST (Male) candidates BPS-07 (Rs.2555-140-6755) plus usual allowances as admissible to them under the rules against the vacant PST post at the schools noted against each with effect from the date of their taking over charge in the interest of public service subject to the following existence terms and conditions:

UNION COUNCIL WISE MERIT 75%

S.No	R.No	Name	Father's Name	Address	School Where Appointed	Remarks
U/C ALO						
1	455	Irfan Ullah	Wajid Ullah	Alo	GPS No. 2 Pepal	Against Vacant PST Post
2	350	Majeed Ullah Shah	Gulab Noor	Alo	GPS Baghi Kheil	Against Vacant PST Post
U/C BABENI						
1	459	Zahir Rahman	Mahir Rahman	Babeni	GPS Sajid Akbar Killi	Against Vacant PST Post
2	347	Iftikhar Khan	Mirzaman Khan	Babeni	GPS Haji Muhammad Killi	Against Vacant PST Post
3	248	Muhammad Tufail	Redad Khan	Babeni	GPS Sajid Akbar Killi	Against Vacant PST Post
4	554	Saeed Khan	Muzaffar Khan	Babeni	GPS Haji Muhammad Killi	Against Vacant PST Post
5	1822 -A	Fazli Qadir	Fazli Ali	Babeni	GPS Sajid Akbar Killi	Against Vacant PST Post
6	563	Izzat Muhammad	Noor Rehman	Babeni	GPS Kodinaka	Against Vacant PST Post
7	1641	Abdus Salam	Sultan Muhammad	Babeni	GPS Shaker Dhand	Against Vacant PST Post
8	1298	Noorul Basar	Badrud Duja	Babeni	GPS Ajab Gul Banda	Against Vacant PST Post
9	1296	Ubaidur Rahman	Badrud Duja	Babeni	GPS Babeni	Against Vacant PST Post
10	1217	Rahmanud Din	Noor Rehman	Babeni	GPS Babeni	Against Vacant PST Post
U/C BABOZAI						
1	406	Masih Ullah	Habib Ullah	Babozai	GPS Roshan Abad	Against Vacant PST Post
U/C BAGHE HARAM						
1	1308	Zahid Hussain	Sadbar	Baghe Haram	GPS Tambulak	Against Vacant PST Post
2	1508	Ayub Khan	Hakeem Khan	Baghe Haram	GPS Seri Koragh	Against Vacant PST Post
3	188	Fazli Wahid	Ghulam Habib	Baghe Haram	GPS Seri Koragh	Against Vacant PST Post
U/C BAGHICHA DHERI						
1	44	Farzand Ali Bacha	Sher Zada Bacha	Baghicha Dheri	GPS But Seri No. 1	Against Vacant PST Post
U/C BAKHSHALI						
1	29	Syed Ali Shah	Syed Abdul Wahid Shah	Bakshali	GPS Zubair Dheri	Against Vacant PST Post
2	1035	Hassan Ali	Zari Bahadar	Bakshali	GPS Gul Dheri	Against Vacant PST Post
3	1034	Riaz Ali	Habib Ur Rahman	Bakshali	GPS Jafar Abad	Against Vacant PST Post
U/C BALA GARHI						
1	200	Muhammad	Gul	Bala Garhi	GPS Bala Garhi	Against Vacant

Name			Father's Name	School Where Appointed		Remarks
U/C GUJRAT						
1	1088	Waqar Ahmad	Husain Ud Din		GPS Kamargai (Gujrat)	Against Vacant PST Post
U/C GULI BAGH						
1	1964	Muhammad Zada	Lal Zafar	Guli Bagh	GPS Guli Bagh	Against Vacant PST Post
2	1591	Shah Jehan	Saeed Gul	Guli Bagh	GPS Guli Bagh	Against Vacant PST Post
U/C GUMBAT						
1	437	Aman Ullah	Gul Jar	Gumbat	GPS Anar Baig No.1	Against Vacant PST Post
2	663	Syed Waqar Ahmad	Syed G. Rabi	Gumbat	GPS Daki	Against Vacant PST Post
U/C HOTI						
1	1102	Arshad Khan	Pazeer Gu.	Hoti	GPS Purana Hoti	Against Vacant PST Post
U/C IKRAM PUR						
1	416	Sher Malik	Fazli Malik	Ikram Pur	GPS Sarjam	Against Vacant PST Post
2	1950	Muhammad Rahman	Ali Rahman	Ikram Pur	GPS Yousaf Fangi	Against Vacant PST Post
U/C JALALA						
1	267	Abdul Qasim	Fazli Subhan	Jalala	GPS Jalala No.2	Against Vacant PST Post
2	1410	Rashid Khan	Misal Khan	Jalala	GPS Khanjaryan No.1	Against Vacant PST Post
3	1876	Muhib Ullah	Zakir Ullah	Jalala	GPS Zarin Abd	Against Vacant PST Post
U/C JAMAL GRAHI						
1	471	Jamil Ud Din	Fayaz Ud Din	Jamal Grahi	GPS Jamal Grahi No.1	Against Vacant PST Post
2	1988	Muhammad Wasif	Roman Shah	Jamal Grahi	GPS Jamal Grahi No.1	Against Vacant PST Post
U/C JEHANGIR ABAD						
1	25	Lal Bacha	Hazrat Wali	Jehangir Abad	GPS Deputy Killi	Against Vacant PST Post
2	804	Qaiser Khan	Shakir Ullah	Jehangir Abad	GPS Deputy Killi	Against Vacant PST Post
U/C KANDAR						
1	31	Mumtaz Ali Shah	Syed Wali Shah	Kandar	GPS Sharif Abad No. 2	Against Vacant PST Post
2	48	Noor Zaman	Shamsut Tabraiz	Kandar	GPS Qari Abad	Against Vacant PST Post
3	105	Jan Bahadar	Habib Khan	Kandar	GPS Habib Khan Killi	Against Vacant PST Post
4	47	Zahoor Ali	Shamsut Tabraiz	Kandar	GPS Habib Khan Killi	Against Vacant PST Post
U/C KATA KHAT						
1	942	Noorul Islam	Muhammad Aqil	Kata Khat	GPS Jandher	Against Vacant PST Post
2	453	Ghufran Ali	Taj Muhammad	Kata Khat	GPS Pir Abad	Against Vacant PST Post
U/C KATLANG NO. 1						
1	679	Muhammad Khan	Muhammad Khan	Katlang -1	GPS Shero	Against Vacant PST Post
U/C KATLANG NO. 2						
1	1853	Shad Ali Khan	Noor Faraz Khan	Katlang 2	GPS Jehan Abad	Against Vacant PST Post
2	239	Ilyas Khan	Muhammad Yousaf	Katlang 2	GPS Gargo, Cheil	Against Vacant PST Post

1	533	Muhammad Tahir	Muhammad Naseem	Rustam	GPS Pando Kotti	Against Vacant PST Post
2	519	Mushtaq Ali	Ejab Gul	Rustam	GPS Nadeh Rustam	Against Vacant PST Post
3	207	Niaz Ali	Ummu Shah	Rustam	GPS Tashqand	Against Vacant PST Post
4	35	Mumtaz Khan	Shamshad Khan	Rustam	GPS Pando Kotti	Against Vacant PST Post
U/C SARO SHAH						
1	844	Imran Khan	Abdul Khaliq	Saro Shah	GPS Hashnagro Killi	Against Vacant PST Post
2	138	Naseer Ahmad	Said Moliammad	Saro Shah	GPS Baido Killi	Against Vacant PST Post
3	723	Irshad Ali	Wazir Zada	Saro Shah	GMPS Haidar Khan Killi	Against Vacant PST Post
4	510	Muhammad Ishaq	Akbar Khan	Saro Shah	GPS Shah Baig	Against Vacant PST Post
U/C SAWAL DHER						
1	5	Inamullah	Hidayat Ullah	Sawal Dher	GPS Ajab Din Killi	Against Vacant PST Post
U/C SERI BEHLOL						
1	174	Hussain Khan	Zarawar Khan	Seri Behlol	GPS Afzal Abad	Against Vacant PST Post
2	115	Sher Rahman	Said Rahman	Seri Behlol	GPS Said Amin No. 1	Against Vacant PST Post
U/C SHAH BAZ GARHI						
1	1815	Mukhtiar Ahmad	Litab Gul	Shahbaz Garhi	GPS Shahbaz Garhi No.1	Against Vacant PST Post
2	876	Tufail Ahmad	Nisar Muhammad	Shahbaz Garhi	GPS Narshak	Against Vacant PST Post
U/C SHAMAT PUR						
1	69	Naseer Ahmad	Faizur Rahman	Shamat Pur	GPS Ahmad Abad Toru	Against Vacant PST Post
2	1849	Muhammad Umair Khan	Farid Gul	Shamat Pur	GPS Anwar Khan Killi	Against Vacant PST Post
U/C SHER GARHI						
1	546	Jehanzeb	Syed Mehmood Jan	Sher Garh	GMPS Maila Masjid (S.Garh)	Against Vacant PST Post
2	1010	Tila Muhammad	Muhammad Akbar	Sher Garh	GMPS Maila Masjid (S.Garh)	Against Vacant PST Post
3	997	Muhammad Hassan	Hazrat Hassan	Sher Garh	GPS Shahid Abad	Against Vacant PST Post
U/C TAKKAR						
1	871	Shah Naseem	Muhammad Karim	Takkar	GPS Fazal Abad No.2	Against Vacant PST Post
U/C TORU						
1	1518	Abdus Sattar	Alam Khan	Toru	GPS Kass Killi	Against Vacant PST Post
2	1120	Fazli Subhan	Shad Muhammad	Toru	GPS Shamshad Abad	Against Vacant PST Post
3	527	Ijaz Ali	Nowsher Khan	Toru	GPS Kass Killi	Against Vacant PST Post
4	1559	Malik Aman	Samir Gul	Toru	GPS Sultan Abad	Against Vacant PST Post

TERMS AND CONDITIONS:

- 1- Their appointments are made purely on contract policy 2005 and will not be entitled for pension / Gratuity as per policy and are liable to termination at any time without any notice or reason.
- 2- They are required to produce health and age certificates from the concerned Medical Superintendent before taking over charge.
- 3- They are not allowed to take over charge if their age is less than 18 years and above.

- 4- Their educational/professional certificates/degree should be verified from the concerned Board/University before draw of their pay and pay should not be released till the comparison of their score with merit list maintained in this office after verification.
- 5- No TADA is allowed.
- 6- They will be governed by contract policy 2005 and other policy/rules released by the Govt. from time to time.
- 7- They are entitled for annul increment on completion of one year service.
- 8- They will take over charge of the post within 15 days.
- 9- In case of resignation they will give one month prior notice to the Department or forfeit one month's salary in Government treasury.
- 10- In case of duplication of post the appointment order of junior most will be withdrawn automatically.

(MIAN WALI MUHAMMAD)
 EXECUTIVE DISTRICT OFFICER
 (SCHOOLS & LITERACY) MARDAN

Endst: No. 23615/G /Apptt PST. Dated Mardan the, 23/12/2006

- Copy forwarded for information and necessary action to the:-
- 1- Director Schools and Literacy NWFP, Peshawar.
 - 2- District Nazim Mardan.
 - 3- District Coordination Officer Mardan.
 Officer Mardan.
 - 4- Officer (Male) Primary Mardan & Takht Bhai.
 Local Office.
 - 8- Head Teachers Concerned.
 - 9- Candidate Concerned.

ASIF 3114

EXECUTIVE DISTRICT OFFICER
 (SCHOOLS & LITERACY) MARDAN

23/12

[Handwritten signature]

WAKALAT NAMA

SCANNED
- 1 -
e-nawaz

IN THE COURT OF KPK Service Tribunal Peshawar

Syed Waqar Ahmad

Appellant(s)/Petitioner(s)

VERSUS

The Govt of KPK etc

Respondent(s)

I/We Applicant do hereby appoint **Mr. Khaled Rehman**, Advocate, Supreme Court, **Mr. Muhammad Amin Ayub & Muhammad Ghazanfar Ali**, Advocates in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

Khaled Rahman,
Advocate,
Supreme Court of Pakistan

&

Muhammad Amin Ayub
Advocate, High Court

&

Muhammad Ghazanfar Ali
Advocate, High Court

4-B, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458

Signature of Executants