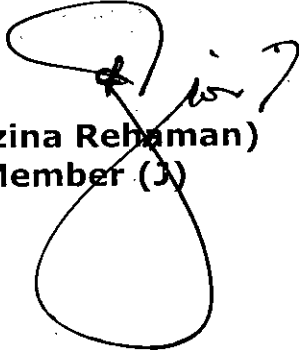


**Service Appeal No. 539/2019**

Dr. Adnan Khan, Advocate for the appellant present. Mr. Noor Zaman Khattak, District Attorney for the respondents present. Arguments heard and record perused.

2. Vide our detailed judgement containing 05 pages, placed on file of connected Service Appeal No. 538/2019 titled "Yousaf Ali Shah Vs Education Department" we have arrived at the conclusion that the Departmental Selection Committee had already recommended the appellant for promotion, and if the length of service was not complete there was a remedy of appointment on acting charge basis, after which, he would be promoted on regular basis after his length of service got completed under the rules. The impugned order vide Endst: No. 4485-90 dated 21.07.2017 is, therefore, set aside and the respondents are directed to consider the appellant for promotion as notified vide order Endst: No. 11443-44, dated 01.08.2017 subject to the condition that he may be considered as on acting charge till such time that his length of service got completed and after which he would be considered as regularly promoted. Consign.

3. *Pronounced in open court in Swat and given under our hands and seal of the Tribunal on this 7<sup>th</sup> day of July, 2022.*

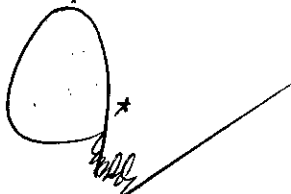
  
(Rozina Rehman)  
Member (J)

  
(FAREEHA PAUL)  
Member (E)

06.06.2022

None for the appellant present. Mr. Kabirullah Khattak,  
Addl: AG for respondents present.

On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the appellant did not appear before the court. Adjourned. To come up for arguments on 08.06.2022 before the D.B at camp court Swat. .



(Mian Muhammad)  
Member(E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

8<sup>th</sup> June, 2022

Appellant in person present. Mr. Kabirullah Khattak,  
Addl: AG for respondents present.

Counsel are on strike. To come up for arguments on 07.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)  
Member(E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

09.12.2021

Appellant present in person.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General alongwith Hussain Ali ADEO for respondents present.

Request for adjournment was made on behalf of appellant; granted. To come up for arguments on 10.02.2022 before D.B at Camp Court, Swat.



(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, Swat.



(Rozina Rehman)  
Member (J)  
Camp Court, Swat

10.02.2022

Tour is hereby canceled. Therefore, the case is adjourned to 07.04.2022 for the same as before at Camp Court Swat.



Reader

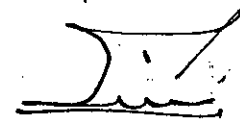
07.04.2022

Appellant alongwith his counsel present. Mr. Hussain Ali Litigation Officer alongwith Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he is proceeding for appearance in cases before Hon'ble Peshawar High Court, Mingora Bench (Dar-UI-Qaza) Swat, therefore, an adjournment may be granted. Adjourned. To come up for arguments on 06.06.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)  
Member (J)  
Camp Court, Swat



(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

06/04/2021

Due to COVID-19, the case is adjourned to

08/06/2021 for the same.

  
READER

08.10.2021

Appellant in person present.

Mr. Riaz Khan Paindakheil, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy before Hon'ble Peshawar High Court, Darul Qaza Bench. Adjourned. To come up for arguments on 09.12.2021 before D.B at Camp Court, Swat.



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



(Rozina Rehman)  
Member (J)  
Camp Court, Swat

09.12.2021

Appellant present, Swat.

~~Mohammad Riaz Khan Paindakheil, learned Assistant Advocate General along with Mussain Ail ADEO for respondents present.~~

~~Request for adjournment was made on behalf of appellant; granted. To come up for arguments on 10.02.2022 before D-B at Camp Court, Swat.~~

(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, Swat.

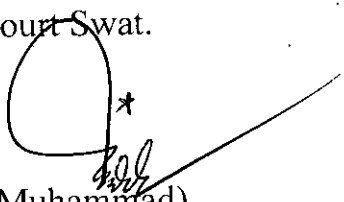
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

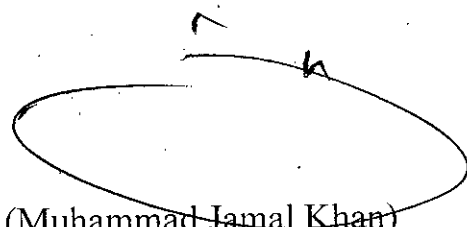
07.10.2020

Counsel for the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Hussain Ali, Litigation Officer for respondents present.

Learned counsel for the appellant requested that he has not prepared the brief and is seeking time for preparation. Time is allowed for preparation of the brief.


Adjourned to 08.12.2020 for arguments before D.B at camp court Swat.

  
(Mian Muhammad)  
Member(E)

  
(Muhammad Jamal Khan)  
Member  
Camp Court Swat

8/12/20

Due to COVID-19 case is  
adJourned. 02-02-2021

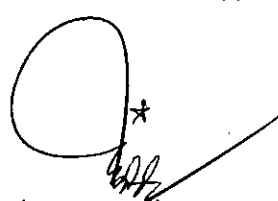
  
Reader


02.02.2021

Nemo for appellant.

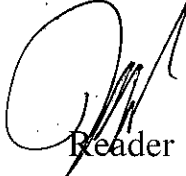
Muhammad Raiz Khan Paindakheil learned Assistant Advocate General alongwith Hussain Ali Litigation Officer for respondents present.

Notice be issued to appellant/counsel for 06.04.2021 for arguments, before D.B at Camp Court, Swat.

  
(Mian Muhammad)  
Member (E)  
Camp Court, Swat

  
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

02.06.2020 Due to Covid-19, the case is adjourned. To come up for the same on 07.07.2020, at camp court Swat.



Reader

06.07.2020 Bench is incomplete. Therefore, the case is adjourned. To come up for the same on 08.09.2020, at camp court Swat.

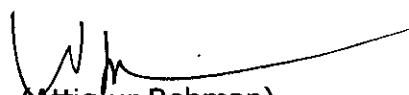


Reader


08.09.2020 Appellant alongwith junior counsel for appellant present.

Mr. Riaz Khan Paindakheil learned Assistant AG alongwith Hussain Ali Litigation Officer for respondents present.

Junior counsel for appellant requested for adjournment as senior counsel is not available; granted. To come up for arguments on 07.10.2020 before D.B at Camp Court, Swat.



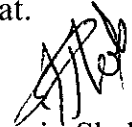
(Attiq ur Rehman)  
Member (E)  
Camp Court, Swat




(Rozina Rehman)  
Member (J)  
Camp Court, Swat

04.11.2019


Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Hussain Ali, Litigation Officer for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today. Case to come up for rejoinder if any and arguments on 08.01.2020 at Camp Court Swat.

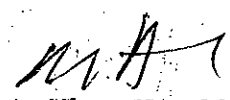
  
(Hussain Shah)  
Member  
Camp Court Swat

  
(M. Amin Khan Kundi)  
Member  
Camp Court Swat

08.01.2020

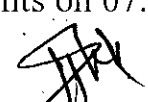
Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Hussain Ali, Litigation Officer for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 03.03.2020 for rejoinder, if any, and arguments before D.B at Camp Court Swat.

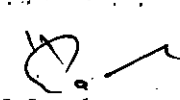
  
(Hussain Shah)  
Member  
Camp Court Swat

  
(M. Amin Khan Kundi)  
Member  
Camp Court Swat


03.03.2020

Appellant in person present. Mr. Riaz Paindakheil learned Assistant Advocate General alongwith Hussain Ali Litigation Officer present. Appellant seeks adjournment as his counsel is not available. Adjourn. To come up for arguments on 07.04.2020 before D.B at Camp Court, Swat.

  
Member

  
Member  
Camp Court, Swat.

Due to corona virus tour to camp court swat has been cancelled to come up for the same on 02/06/20

  
Qadret

01.07.2019

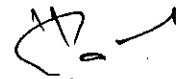
No one present on behalf of appellant. Written reply not submitted. Hussain Ali Litigation Officer representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 03.09.2019 before S.B at Camp Court, Swat.



Member  
Camp Court, Swat.

03.09.2019

Appellant in person present. M/S Johar Ali SCT and Hussain Ali Litigation Officer present and submitted written reply/comments. Adjourn. To come up for rejoinder if any and arguments on 08.10.2019 before D.B at Camp Court, Swat.



Member  
Camp Court, Swat.

08.10.2019

Appellant in person and Mian Amir Qadir, Deputy District Attorney alongwith Mr. Hussain Ali, Litigation Officer for the respondents present. Appellant seeks adjournment on the ground that his counsel is not available today. Adjourned to 04.11.2019 for rejoinder if any and arguments before D.B at Camp Court Swat.



(Hussain Shah)  
Member  
Camp Court Swat

04/11



(Muhammad Amin Khan Kundi)  
Member  
Camp Court Swat



06.05.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 18.08.2017 whereby the promotion order dated 01.08.2017 in respect of the appellant from PST to SST was withdrawn on the ground that his length of service is less than 07 years.

Points raised need consideration. The appeal is admitted for regular hearing subject to all the legal objections including the issue of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 10.06.2019 before S.B at Camp Court, Swat.

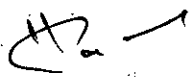
Annexed with the memo of appeal is an application for interim relief. Notice of the same be also issued to the respondents for the date fixed. In the meanwhile status quo be maintained till the date fixed at the costs and risk of the appellant in that in case the appellant fails to make out his case, he has to deposit back all the emoluments/privileges secured as SST.

Appellant Deposited  
Security & Process Fee  
16/5-19

  
Member  
Camp Court, Swat

10.06.2019


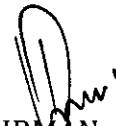
Learned counsel for the appellant present. Written reply not submitted. Toseef Ahmad Litigation Officer representative of respondent department present and requested for time to furnish written reply/comments. Granted. To come up for written reply/comments on 01.07.2019 before S.B at Camp Court, Swat.

  
Member  
Camp Court, Swat

Form- A  
FORM OF ORDER SHEET

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

Case No. \_\_\_\_\_ 539/2019 \_\_\_\_\_

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 26/04/2019                | <p>The appeal of Mr. Noor-ul-Ahad presented today by Dr. Adnan Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR 26/4/19</p> |
| 2-    | 30-04-19                  | <p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>06-05-2019</u></p> <p style="text-align: right;"><br/>CHAIRMAN</p>  |

**BEFORE THE HON'BLE SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 539 of 2019

Noor-ul-Ahad Mian .....Appellant

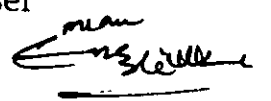
**VERSUS**

Government of Khyber Pakhtunkhwa & others.....Respondents

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| S. No. | Description  | Annexure | Pages No. |
|--------|--|----------|-----------|
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| 2.     | Affidavit  |          | 6         |
| 3.     | Addresses of parties   |          | 7         |
| 4.     | Application for grant of Interim relief                                    |          | 8-9       |
| 5.     | Copy of seniority list   | A        | 10        |
| 6.     | Copy of appointment order Endst: No. 11443-44 dated 01-08-2017             | B        | 11-14     |
| 7.     | Copy of charge assumption report   | C        | 15        |
| 8.     | Copy of order Endst: No.4485-90 dated 18-08-2017                           | D        | 16        |
| 9.     | Copy of policy   | E        | 17-23     |
| 10.    | Copy of memo of departmental appeal  | F        | 24-25     |
| 11.    | Copy of order dated 11-09-2017   | G        | 26        |
| 12.    | Copy of comments   | H        | 27-30     |
| 13.    | Copy of order dated 16-04-2019   | I        | 31-33     |
| 14.    | <del>Copy of service certificate</del><br>Copy of similar promotion orders | J        | 34-38     |
| 15.    | <del>Copy of similar promotion orders</del><br>Wakalatnama                 |          | 39        |
|        | <del>Wakalatnama</del>   |          |           |

Appellant through Counsel

**Dr. Adnan Khan, Barrister-at-Law**  
Office: Adnan Law Associates,  
Opp. Grassy ground Mingora, Swat.  
Cell: 0346-9415233

1

**BEFORE THE HON'BLE SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 539 of 2019

Noor-ul-Ahad Mian s/o Mian Muhammad r/o Serai Jukhtai  
Miandam, District Swat.

Appellant Khyber Pakhtunkhwa  
Service Tribunal

**MERSUS**

Diary No. 669

Dated 26/4/19

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Saidu Sharif, Swat.

.....Respondents

**APPEAL UNDER SECTION 4 OF THE**  
**KHYBER PAKHTUNKHWA SERVICE**  
**TRIBUNAL ACT, 1974.**

Respectfully Sheweth:

1. That appellant is a regular employee of Elementary & Secondary Education Department Khyber Pakhtunkhwa, who was initially appointed and posted as a Primary School Teacher.
2. That various posts of Secondary School Teachers (BPS-16) fell vacant in District Swat, which were to be filled by appointment by way of promotion amongst the primary school teachers.

Filed to-day

Registrar

26/4/19

3. That the appellant, at that time was not considered for the said appointment for which he preferred an appeal, which was allowed by the competent authority and later on appellant was enlisted in the relevant seniority list (Copy of seniority list is attached as Annexure "A").
4. That subsequently, the appellant was posted as Senior School Teacher at GHS Dureshkhela (Copy of appointment order Endst: No. 11443-44 dated 01-08-2017 is attached as Annexure "B").
5. That consequently, the appellant forthwith assumed charge of his post as SST (BPS-16) at his place of posting (Copy of charge assumption report is attached as Annexure "C").
6. That the appellant was performing his duties in routine, that all of a sudden received office order from respondent No.2 on 25-08-2017 (hereinafter referred to as "the impugned order") without any prior notice or intimation whatsoever, whereby the appointment order in respect of appellant in BPS-16 was withdrawn and the appellant's services were placed at the disposal of respondent No.3 (Copy of order Endst: No.4485-90 dated 18-08-2017 is attached as Annexure "D").
7. That the sole ground for issuance of the impugned order was mentioned as lack of the requisite seven years experience, apparently in violation of the relevant policy notified on 24-07-2014 (Copy of policy is attached as Annexure "E").
8. That being aggrieved as above, the appellant filed departmental appeal before respondent No.1. Needless to say that the same has

not been responded to as yet (Copy of memo of departmental appeal is attached as Annexure "F").



9. That in order to seek his legal remedy before the competent forum, the appellant approached the Hon'ble Peshawar High Court/Mingora Bench through W.P No.627-M/2017.
10. That the Hon'ble Court was pleased to grant interim relief to the effect that the appellant shall not be disturbed from his current position (Copy of order dated 11-09-2017 is attached as Annexure "G").
11. That pursuant to the Hon'ble Court's directives, the answering respondents filed their comments before the Hon'ble High Court (Copy of comments is attached as Annexure "H").
12. That the Hon'ble High Court after hearing submissions, dismissed the petition vide order dated 16-04-2019 on the ground of jurisdictional bar contained in Article 212 of the Constitution (Copy of order dated 16-04-2019 is attached as Annexure "I").
13. That being aggrieved of as above, the appellant files this appeal, *inter alia*, on the following grounds;

**GROUND:**

- A) That the impugned order is illegal, unilateral and violative of due process, hence, liable to be declared as nullity in the eyes of law.
- B) That the appellant is nowhere deficient in terms of the requisite seven years experience as prescribed by the relevant policy. The

appellant has more than ten years experience of teaching in various public and private sector schools ~~(Copy of experience certificate is attached in Annexure 3.)~~

- C) That assuming for the sake of arguments that the appellant lacks the requisite length of service as mandated by the policy, even then he is entitled to continue as SST on need basis as prescribed by S.No.1 (f)(ii) of the Policy. Needless to say that the appellant's appointment was also made on need basis for which there is no requirement of seven years experience.
- D) That even if the appellant's appointment as SSTs be deemed as irregular, even then the said order cannot be withdrawn on the principle of *locus ponentia* for the reason that there has been no fault on behalf of the appellant in the whole episode.
- E) That assuming for the sake of arguments that the relevant policy does not favour the appellant, even then the same cannot act to the detriment of appellant. It is worth mentioning that the policy was promulgated on 24-07-2014, when the appellant was already in service. As per the established principles of protection against retrospectively as reiterated by Section 6 of the General Clauses Act and Article 264 of the Constitution, any law or policy detrimental to an individual cannot apply to an incumbent, rather the same would apply prospectively.
- F) That various other employees though deficient in experience than the appellant have been promoted and retained as SST (BPS-16). Hence, on the principle of equality before the law, the appellant is

also entitled to continue as SST without being disturbed   
 (Copy of similar order is Ann. "J").  


G) That further grounds with leave of this Hon'ble Tribunal will be raised at the time of oral submissions.

It is, therefore humbly prayed that on acceptance of this appeal, the impugned order Endst: No.4485-90 be declared as illegal, the same may be set aside. Consequently, it may be ordered that the appellant shall continue his services as SST (BPS-16) as per law of the land. Any other remedy, though may not specifically prayed for but which the ends of justice would demand in the circumstances, may also be granted.



Appellant  
Through Counsel

Dr. Adnan Khan, Barrister-in-Law  
Advocate Supreme Court of Pakistan

**CERTIFICATE:**

Certified that no such like appeal has earlier been filed before this Hon'ble Tribunal on the subject matter.



Appellant  
Through Counsel

Dr. Adnan Khan, Barrister-in-Law  
Advocate Supreme Court of Pakistan.



6

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KPK**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2019

Noor-ul-Ahad Mian.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa and others

.....Respondents

**AFFIDAVIT**

I, **Noor-ul-Ahad Mian** (Appellant), do hereby solemnly affirm and declare that the contents of the above titled Appeal are true and correct to the best of my knowledge and belief. Furthermore, no such like appeal has earlier been filed before this Hon'able Tribunal or elsewhere on this subject matter

DEPONENT

*Noor-ul-Ahad Mian*

**Noor-ul-Ahad Mian**



**BEFORE THE HON'BLE SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

*Service Appeal No. \_\_\_\_\_ of 2019*

Noor-ul-Ahad Mian ..... *Appellant*

**VERSUS**

Government of Khyber Pakhtunkhwa and others

..... *Respondents*

**ADDRESSES OF THE PARTIES**

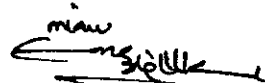
**APPELLANT:**

Noor-ul-Ahad Mian s/o Mian Muhammad r/o Serai Jukhtai  
Miandam, District Swat.

**RESPONDENTS:**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Saidu Sharif, Swat.

Appellant



Noor-ul-Ahad Mian

**BEFORE THE HON'BLE SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

*Service Appeal No. \_\_\_\_\_ of 2019*

Noor-ul-Ahad Mian s/o Mian Muhammad r/o Serai Jukhtai  
Miandam, District Swat.

.....*Appellant/Applicant*

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Saidu Sharif, Swat.

.....*Respondents*

**APPLICATION FOR SUSPENSION OF IMPUGNED ORDER**

**DATED 21-07-2017:**

- 1) That the above titled appeal is being filed before this Hon'ble Tribunal, which is yet to be fixed for regular hearing.
- 2) That during the pendency of Writ Petition as mentioned in the memo of appeal, the Hon'ble Court had granted interim relief to the appellant.
- 3) That this appeal is in continuation of the aforementioned Writ Petition, hence the same order ought to be passed in the instant appeal as well.

9

- 4) That the appellant has in prima facie a strong case. The other ingredients i.e apprehension of irreparable loss and balance of convenience also lie in grant of interim relief.

It is, therefore, humbly prayed that on acceptance of this application, operation of the impugned order be kept in suspension till the final decision of the main appeal.

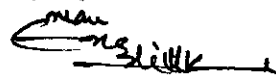
Applicant/Appellant  
Through Counsel



**Dr. Adnan Khan, Barrister-at-Law  
Advocate Supreme Court of Pakistan.**

CERTIFICATE:

It is certified that no such like application has earlier been filed before this Hon'ble Tribunal on the cited subject.



Applicant/Appellant  
Through Counsel



**Dr. Adnan Khan, Barrister-at-Law  
Advocate Supreme Court of Pakistan.**



|                               |    |
|-------------------------------|----|
| Total No. of SST Vacant Posts | 26 |
| Promoted through this order   | 03 |

| No. | Sl. No. | Name of Teacher | Place of duty  | D/O Birth | Date of Appnt. as regular / CT | Remarks  |
|-----|---------|-----------------|----------------|-----------|--------------------------------|--|
| 1   | 207     | Ayub Hussain    | GMS GHARBAG II | 15-03-77  | 06-08-02                       | Services placed at the disposal of DEO (M) Swat for further posting against SST (General) post |
| 2   | 291     | Zakirullah      | GMS MATTA      | 10-03-88  | 01-06-12                       | do   |
| 3   | 818     | Abdul Hamid     | gms jara       | 01-04-79  | 01-06-12                       | do   |

**P. PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-16**

|  |    |
|--|----|
| Total No. of SST vacant post of SST (Phy-Maths)        | 65 |
| 25% share initial recruitment                          | 16 |
| 75% share for Promotion                                | 49 |
| 20% Share of promotion of PSHT/SPST/PST                | 13 |
| No. of SST (Phy-Maths) remained vacant in previous DPC | 03 |
| Posts available for promotion                          | 16 |
| Promoted through this order                            | 14 |

| Sr. No. | Sl. No. | Name of Teacher    | Place of duty      | D/O Birth | Date of Appnt. as regular / PST | Qualification | Remarks  |
|---------|---------|--------------------|--------------------|-----------|---------------------------------|---------------|--|
| 1       |         | Iqbal Rauan        | GPS Mingora #2     | 02-03-76  | 31-08-06                        | BSc/B.Ed      | Services placed at the disposal of DEO (M) Swat for further posting against SST (General) post |
| 2       | 1939    | Abdul Wahab        | GPS Dambara        | 06-03-77  | 31-08-06                        | BSc/B.Ed      | do   |
| 3       | 1959    | Umar Dair          | GPS Ichkanai       | 10-03-82  | 31-08-06                        | BSc/B.Ed      | do   |
| 4       | 2041    | Sher Muhammad Khan | GPS Onra           | 02-01-83  | 31-08-06                        | BSc/B.Ed      | do   |
| 5       | 2069    | Kalimullah Khan    | GPS Nazir Abad     | 01-04-74  | 02-09-09                        | BSc/B.Ed      | do   |
| 6       | 2151    | Samiullah          | GPS Gojar Tangay   | 01-07-79  | 02-09-09                        | BSc/B.Ed      | do   |
| 7       | 2212    | Yousaf Khan        | GPS Mingora #3     | 15-04-88  | 02-09-09                        | BSc/B.Ed      | do   |
| 8       | 2224    | Muhammad Ayoob     | GPS Sher Atrof     | 01-09-81  | 02-09-09                        | BSc/B.Ed      | do   |
| 9       | 2240    | Shahid Rahman      | GPS Guligram       | 11-04-83  | 02-09-09                        | BSc/B.Ed      | do   |
| 10      | 2272    | Ihsanullah         | GPS Shandal        | 17-04-83  | 02-09-09                        | BSc/B.Ed      | do   |
| 11      | 2276    | Fazal Badshah      | GPS Manyar         | 28-06-83  | 02-09-09                        | BSc/B.Ed      | do   |
| 12      | 2284    | Javid Ali          | GPS Tindodag       | 03-03-85  | 02-09-09                        | BSc/B.Ed      | do   |
| 13      | 2390    | Yousaf Ali Shah    | GPS NO.2 BAZ KHILA | 05-06-81  | 30-06-11                        | BSc/B.Ed      | do   |
| 14      | 2430    | Noor Ul Ahsan Mian | GPS MIANDA M       | 05-03-96  | 30-06-11                        | BSc/B.Ed      | CERTIFIED TO BE TRUE COPY  |

**C. SST (General)**

**L. PROMOTION OF SCT/CT TO SST (General) BPS-16**

|   |    |
|---|----|
| Total No. of SST General (M) Posts vacant Posts | 61 |
| 25% share initial recruitment                   | 15 |
| 75% share for Promotion                         | 46 |
| 40% Share of promotion of SCT/CT                | 24 |

Barister  
*Dr. Adnan*  
 Advocate High Court



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)

Swat.

(Cell # 0946 9240209-228)

**NOTIFICATION.**

Consequent upon the notification issued by the Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide his Office Endst: No.167-72/File No.2/Promotion SST BPS-16 dated Peshawar the 01.08.2017, the following SSTs (whose services were placed at the disposal of DEO (M) Swat for further adjustment) are hereby adjusted against the post in the schools noted against each in the interest of public service on regular basis under the existing policy of the Provincial Government on the terms and conditions given in the aforementioned notification of the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with immediate effect.

**SST (General)**

| S.No | Name & Designation       | Present School   | School where adjusted in B-16 | Remarks                          |
|------|--------------------------|------------------|-------------------------------|----------------------------------|
| 1    | MUHAMMAD SHER SCT        | GHS SHALPIN      | GHS SHALPIN                   | Against vacant SST-(G) Post.     |
| 2    | KHAN SAID SCT            | GHS KOTLAI       | GHS SWEGALAI                  | -do-                             |
| 3    | MUHAMMAD BADSHAH SCT     | GHS KABAL        | GHS BANDAI                    | -do-                             |
| 4    | MUHAMMAD AMBALI KHAN SCT | GHS GULIBAGH     | GHS GULIBAGH                  | -do-                             |
| 5    | IFTIKHAR HUSSAIN SCT     | GHSS MINGORA     | GHSS MINGORA                  | Against vacant SST-(G) Post.     |
| 6    | TARIQ KHAN SCT           | GHSS BARIKOT     | GHSNAWAKALAY (B)              | Against newly crated SST (G)post |
| 7    | HABIB AHMAD SCT          | GHS CHUPRIAL     | GHS CHUPRIAL                  | Against vacant SST-(G) Post.     |
| 8    | QURBAN ALI SCT           | GHSS CHARBAGH    | GHS TOHA                      | -do-                             |
| 9    | KHALIL MUHAMMAD SCT      | GHS GULIBAGH     | GHS GULIBAGH                  | -do-                             |
| 10   | BASHIR AHMAD SCT         | GHSS DEHRAI      | GHSS DEHRAI                   | -do-                             |
| 11   | IQBAL MUHAMMAD SCT       | GHS TINDODAG     | GHS MANYAR                    | -do-                             |
| 12   | BAKHT RAHMAN SCT         | GHS NO.1 MINGORA | GHS SEER                      | -do-                             |
| 13   | MUHAMMAD TAHIR SCT       | GHS ODIGRAM      | GHS ODIGRAM                   | -do-                             |

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Dr. Adnan Khan  
Advocate High Court

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|    |                         |                       |                  |                                    |
|----|-------------------------|-----------------------|------------------|------------------------------------|
| 14 | SARDAR AHMAD KHAN SCT   | GHS NO.1 MINGORA      | GHS CHITOR       | Against newly created SST (G) post |
| 15 | JAMSHID KHAN SCT        | GHS CHAIL             | GHS CHAIL        | Against vacant SST- (G) Post.      |
| 16 | MUHAMMAD ZAHIR SHAH SCT | GHSS SIJBANR          | GHSS SIJBANR     | -do                                |
| 17 | DAWOOD SHAH SCT         | GHS NAWAKALAY BARIKOT | GHS ABOHA        | -do                                |
| 18 | USMAN ALI SCT           | GHSS MINGORA          | GMS SANGOTA      | -do                                |
| 19 | RAHAM ZEB SCT           | GHSS KHWAZAKHELA      | GHSS KHWAZAKHELA | -do                                |
| 20 | FURQAN NAZ SCT          | GCMHS WADUDIA         | GCMHS WADUDIA    | -do                                |
| 21 | ISMAIL SHAH SCT         | GHSS KABAL            | GHSS KABAL       | -do                                |
| 22 | ZAFARULLAH SCT          | GHS BAHRAIN           | GHS BAHRAIN      | -do                                |
| 23 | PERWANAT KHAN SCT       | GHS MINGORA #1        | GHSS KABAL       | -do                                |
| 24 | IBRAHIM SPST            | GPS NO.1 MINGORA      | GMS DAROLAI      | -do                                |
| 25 | HAIDER ALI PHST         | GPS SARKHAZANA #1     | GMS SAR BANDA    | -do                                |
| 26 | AHMAD ALI PHST          | GPS KHAIR ABAD        | GHSS DEOLAI      | -do                                |
| 27 | KHUSHAL KHAN PHST       | GPS BALOKALAY         | GMS TALANG       | -do                                |
| 28 | GHULAM MUHAMMAD PHST    | GPS MANDAR            | GHS MATTA        | -do                                |
| 29 | BACHA ZADA PHST         | GPS KOTANAI           | GHS MANPITAI     | -do                                |
| 30 | HUSSAIN GUL PHST        | GPS GADI              | GHS SHAH DEHRAI  | -do                                |
| 31 | AHMAD HUSSAIN SAT       | GHS KOTLAI            | GHS BARA SAMAI   | -do                                |
| 32 | FAZAL RABI STT          | GHS SHAGAI            | GHS GURRA        | -do                                |
| 33 | RASHID ALI STT          | GHS BEHA              | GHS BEHA         | -do                                |
| 34 | BASHIR AHMAD SQARI      | GHS AMANKOT           | GHS AMANKOT      | -do                                |
| 35 | SERAJUL HAQ SDM         | GHS MANPITAI          | GHS SHERPALAM    | -do-                               |
| 36 | KHURSHID ALI SDM        | GHS TOPSIN            | GHSS MATTA       | -do                                |

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Dr. Adnan Khan  
Advocate High Court

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|      |                       |                 |                 |      |
|------|-----------------------|-----------------|-----------------|------|
| 15   | JAVID ALI SPST        | GPS TINDODAG    | GHSS BALOGRAM   | -do- |
| ✓ 16 | YOUSAF ALI SHAH SPST  | GPS BAZKHELA #2 | GHS DURASHKHELA | -do- |
| ✓ 17 | NOORUL AHAD MIAN SPST | GPS MIANDAM     | GHSS MIANDAM    | -do- |



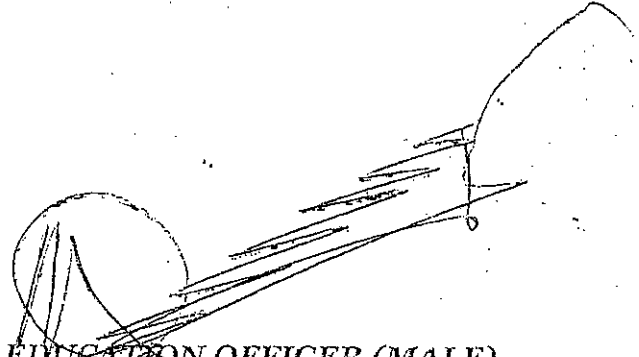
(MULLA AHMAD AMIN)  
DISTRICT EDUCATION OFFICER (MALE)  
SWAT GUL KADA

Endst No: 11443-44/

dated: 01/08/2017.

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Account Swat.
3. The Deputy DEO (M) local Office.
4. The Principal/Head Master Concerned.
5. The Supdt: Secy: local Office.
6. The B&AO local Office.
7. The Candidates concerned.
8. PA to DEO Local Office.



DISTRICT EDUCATION OFFICER (MALE)  
SWAT GUL KADA

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*Adnan Khan*  
Barrister  
*Dr. Adnan Khan*  
Advocate High Court

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*Mu*

OF 03/11/2017  
1905 3072 3M





**SST (Sc-I) BIO/ CHEM**

|    |                     |                    |                  |                                   |
|----|---------------------|--------------------|------------------|-----------------------------------|
| 1  | GOHAR ALI SPST      | GPS GHALIGAY       | GHS GHALIGAY     | Against newly created SST (G)post |
| 2  | IMRAN SPST          | GPS GULIGRAM       | GHS GULIGRAM     | -do-                              |
| 3  | TALIMAND KHAN SPST  | GPS KOZ SHAWAR     | GHS LABAT        | -do-                              |
| 4  | FAZAL MABOOD SPST   | GPS MATTA          | GHS MATTA        | -do-                              |
| 5  | ZIAULLAH SPST       | GPS JURBANDAI      | GHS CUPRIYAL     | -do-                              |
| 6  | ABUBAKAR SPST       | GMPS GIRI DAD      | GHS TOPSIN       | -do-                              |
| 7  | MUHAMMAD NAWAB SPST | GPS ONRA DHERAI    | GHS BEHA         | -do-                              |
| 8  | BACHA NAWAB SPST    | GPS ARCHALAI       | GHS GODA         | -do-                              |
| 9  | RASHID AHMAD SPST   | GPS MAHAK          | GHS TOTANOBANDAI | -do-                              |
| 10 | SARANZEB SPST       | GPS #2 FATEHPUR    | GHSS FATEHPUR    | -do-                              |
| 11 | REHAN ALI SPST      | GPS TANGAI SHAH    | GHS SIRSINAI     | -do-                              |
| 12 | FARMAN ALI SPST     | GPS KOZA BAMAKHELA | GHSS BAMAKHELA   | -do-                              |
| 13 | JAVID SPST          | GPS DAGAY          | GHS KOTLAI       | -do-                              |

**SST(Sc-II) MATHS/ PHYSICS**

|    |                         |                  |                  |      |
|----|-------------------------|------------------|------------------|------|
| 1  | ARSHAD HUSSAIN SCT      | GMS CHARBAGH     | GHSS CHARBAGH    | -do- |
| 2  | ZAKIRULLAH SCT          | GHS MATTA        | GHS MATTA        | -do- |
| 3  | ABDUL HAMID SCT         | GMS JARE         | GHS RAHAT KOT    | -do- |
| 4  | IQBAL RAWAN SPST        | GPS MINGORA #2   | GHSS MINGORA     | -do- |
| 5  | ABDUL WAHAB SPST        | GPS DAMBARA      | GHSS KHWAZAKHELA | -do- |
| 6  | UMAR DAIR SPST          | GPS ICHKANAI     | GHSS SAKHRA      | -do- |
| 7  | SHER MUHAMMAD KHAN SPST | GPS ONRA         | GHS BEHA         | -do- |
| 8  | KALIMULLAH KHAN SPST    | GPS NAZAR ABAD   | GHS SHER PALAM   | -do- |
| 9  | SAMIULLAH SPST          | GPS GOJAR TANGAY | GHS GULIGRAM     | -do- |
| 10 | YOUSAF KHAN SPST        | GPS MINGORA #3   | GHS MINGORA      | -do- |
| 11 | MUHAMMAD AYAZ SPST      | GPS SHER ATRAF   | GHS CHITOR       | -do- |
| 12 | SHAHI RAHMAN SPST       | GPS GULIGRAM     | GCMHS WADUDIA    | -do- |
| 13 | IHSANULLAH SPST         | GPS SHANDAL      | GHS LABAT        | -do- |
| 14 | FAZAL BADSHAH SPST      | GPS MANYAR       | GHS GHALIGAY     | -do- |

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Barrister  
*Dr. Salman Khan*  
Advocate High Court

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# SWAT EDUCATION DEPARTMENT

Department of Elementary & Secondary Education, Swat.  
Govt. of Khyber Pakhtunkhwa.



Tel: 0946-9240209 - 9240228

Web: www.sed.edu.pk

Online Portal: www.swateducation.com

Email: swateducation@gmail.com

## CHARGE REPORT

(For Transferred or Promoted Employee Only)

Certified that Miss./Mr. NOOR-UL-AHAD MIAN Father Name MIAN MUHAMMAD  
 Resident of SERAI (JUKHTAI) P.O MIANDAM is hereby transferred/Promoted against the post of  
SST-II BPS. 16 at (School Name) GHSS MIANDAM SWAT  
 from (School Name) GPS JUKHTAI Post PST BPS 12  
 under the District Education Officer Order Endstt No: 11443-44 Dated 01-08-2017

Signature of the  
 Transferred Official

### FOR HEAD OF THE SCHOOL ONLY

File No. \_\_\_\_\_

Certified that we have on the (fore/afternoon) 1.8.2017 of this day (date) \_\_\_\_\_  
 respectively and gave a charge of post SST-II (Phy. mat) in above mentioned school to this charge report holder,  
 and received her require documents file for school record.

Seal & Signature  
 Head of the School  
 Govt. Higher Secondary School  
 Miandam, Distt: Swat.

Tick to whom Copy of the above is forwarded to:

1. Heads of the concern schools.
2. ASDEO Circle Office
3. The Sub Divisional Education Officer (SDEO) Swat.
4. Deputy District Education Officer (Dy. DEO) Swat.
5. District Education Officer (DEO) Office Swat.
6. District Account Officer Swat.
5. Concern for his/her Record.

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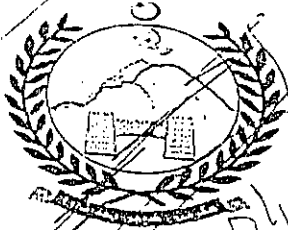
Barrister  
 Dr. Aibman Khan  
 Advocate High Court

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**Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

**OFFICE ORDER.**

The promotion order in respect of the following officials form PST to SST (Phy-Maths) BPS-16 issued vide Notification No. 167-72 Dated 01-09-2017 is hereby withdrawn as their length of service is less than 7 years.

| Sr No. | Seniority No | Name of official  | Place of posting   | D/O apptt; as P regular |
|--------|--------------|-------------------|--------------------|-------------------------|
| 13     | 2390         | Yousaf Ali Shah   | GPS No.2 Baz Khela | 30-06-2011              |
| 14     | 2430         | Noor Ul Ahad Mian | GPS, Miandam       | 30-06-2011              |

Furthermore their services are hereby placed at the disposal of District Education Officer (Male) Swat for further posting against vacant posts of PST.

Director

4485-90  
Endst: No. \_\_\_\_\_ / File No.3/A-14/SST/Adhoc/Apptt;  
Dated Peshawar the 21/07/2017.

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa, Peshawar.
  2. District Education Officer (Male) Swat.
  3. District Accounts Officer Swat.
  4. Official concerned.
  5. PS to Secretary to Govt. of Khyber Pakhtunkhwa, E&SE Department, Peshawar.
  6. PA to Director Local Directorate.
  7. Master File.

CIT-C  
[Signature]

[Signature] 18/8/17 ✓  
Dy. Director (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

[Signature] 19/8/17 ✓

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Barrister  
Dr. Adnan Khan  
Advocate High Court

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25/8/17



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

Peshawar, dated the 24<sup>th</sup> July, 2014.

**NOTIFICATION**

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

**AMENDMENTS**

**In the Appendix,-**

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

| 1   | 2                           | 3   | 4              | 5  |
|-----|-----------------------------|---|----------------|--|
| "1. | Subject Specialist (BPS-17) | i. At least second class Master's Degree or four years BS Degree in the relevant subject; and<br><br>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.<br><br>Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial |

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Barrister  
Advocate High Court

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|    |                                      |   |             |   |
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|    |                                      |   |             | recruitment; and<br>(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:<br><br>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;<br><br>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<br><br>(b) fifty percent by initial recruitment"; and |

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Dr. Adnan Khan  
Advocate High Court

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(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),<br/>Or<br/>(b) (Physics, Maths "A" or "B" or Statistics)<br/>Or<br/>(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="text-align: center;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p> |

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*Dr. Adnan Khan*  
Advocate High Court

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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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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;

(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:

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;

(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:

Provided that if no suitable candidate is available from amongst

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Dr. Adnan Khan  
Advocate High Court**

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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty Five percent by initial recruitment.

**Note:**

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

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*Dr. Adnan Khan*  
Advocate High Court

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

**Endst : of even No & date:**

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. 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

**CERTIFIED TO  
BE A TRUE COPY**



Barrister  
*Dr. Adnan Khan*  
Advocate High Court

C.T.C  
*[Signature]*

**(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)**

The Secretary  
Elementary & Secondary Education  
Khyber Pakhtunkhwa  
Peshawar.

(24)

Ann  
"F"

Through : Proper Channel

Subject : APPEAL AGAINST THE OFFICE ORDER ENDST: NO. 4485-90 OF THE DIRECTORATE OF  
ELEMENTARY AND SECONDARY EDUCATION, GOVT. OF KHYBER PAKHTUNKHWA.

Dear Sir

With due adoration this is to state that:

- 1) We have been promoted from PSTs to SSTs.
- 2) The promotion is granted on-need base, vide office order-Endst: No. 114443-44, dated: 01/08/2017, after appeal against ineligible candidates.
- 3) The promotion is made on revised approval of Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa after deferment of the ineligible candidates.
- 4) Unfortunately another order Endst: No. 4485-90 of the aforesaid authority has been issued against the promoted employees on dated: 21/07/2017
- 5) If the promoted employees were not eligible then why they are promoted.
- 6) The policy has the possibility of need base promotion and need is lucid because according to the approval 02 posts of SSTs-II are still unfilled after promoting the appellants in PSTs quota while 23 posts of CTs are available for promotion.
- 7) We've joined new posts and have been performing duties as SSTs (Physics, Math)
- 8) No prior notice has been issued to us for **Personal Hearing** and a direct order is issued which is illegal.
- 9) In nearly past, promotions are granted to the employees of education, (i.e. Mr. Ghani Akbar DM to SST-II; appointment year 2010 and promotion year 2015 and some others.) in District Swat, having less than five years of services. You may check those records.
- 10) In the meanwhile, we have received invitations from the KPPSC and NTS for participation in the scrutiny process for various posts i.e Zilladar in irrigation Deptt. and Assistant Director Ministry of Overseas Pakistani. But we ignored due to already joined posts in BPS-16.

Therefore, you are requested to **restitute** the promotion order Endst: No. 114443-44, dated: 01-08-2017 for the best interest of the students as well as country to sustain the light of education and sweep out the darkness of ignorance.

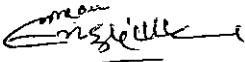
Docs Attached:

- a) Approval
- b) Office Orders
- c) Charge Report


Thanking you!

Yours truly

1) Noor Ul Ahad Mian  
SST-II, GHSS Miandam Swat  
CNIC: 15602-7490702-7

Sign:   
Date: 28/08/2017

2) Yousaf Ali Shah  
SST-II, GHS Drushkhela Swat  
CNIC: 15601-1020140-7

Sign:   
Date: 28/08/2017

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Annex 'G'

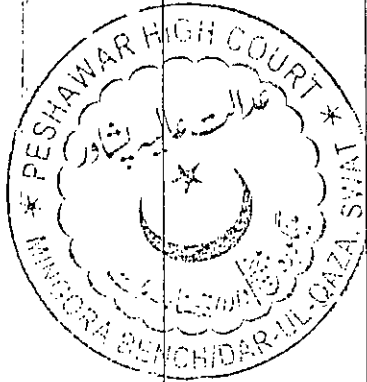
PESHAWAR HIGH COURT, MINGORA BENCH

FORM OF ORDER SHEET

Court of .....

Case No..... of.....

| Serial No. of order or proceeding | Date of Order or Proceedings | Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary.  |
|-----------------------------------|------------------------------|---|
| 1                                 | 2                            | 3   |
|                                   | 11.09.2017                   | <p><u>W.P 627-M/2017</u></p> <p><b>Present:</b> Barrister Dr. Adnan Khan, Advocate for Petitioners.</p> <p style="text-align: center;">***</p> <p>Respondents No.2 &amp; 3 be put on notice to file their para-wise comments to the writ petition within fortnight. Adjourned to a date in office.</p> <p><b><u>INTERIM RELIEF</u></b></p> <p>Notice to the other side. In the meanwhile, the petitioners are still enjoying the position of the promotion, therefore, they shall not be disturbed.</p> <p style="text-align: right;"><b>Sd. Musarat Hilali-J</b></p> <p style="text-align: right;"><b>Sd. Muhammad Nasir Mahfooz-J</b></p> <p style="text-align: center;"><b>Certified to be true copy</b></p> <p style="text-align: center;"><b>EXAMINER</b><br/>Peshawar High Court, Mingora/Kar-ul-Qaza, Swat<br/>Incorporated by the Proclamation of Qanoon-e-Shahadat Order 1984</p> <p>S.No..... 668</p> <p>Name of Applicant.....</p> <p>Date of Presentation of Application..... 13/9/17</p> <p>Date of Revocation of Court..... 13/9/17</p> <p>No. of Copies..... 02</p> <p>Cost Paid For.....</p> <p>Fees Charged..... 06/-</p> <p>Date of Delivery of Copies..... 13/9/17</p> |



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Comments A<sup>um</sup>

BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH / DARULOAZA SWAT "H"

Writ petition No. 627-M/2017

1. Yousaf Ali Shah S/O Muhammad Rahim R/O Bara Dureshkhela District Swat.
2. Noor-ul-Ahad Mian S/O Mian Muhammad R/O Serai Jukhtai, District Swat.....Petitioners

**Versus**

1. Government of Khyber Pakhtun Khwa Through Secretary Elementary and secondary education Peshawar
  2. Director Elementary and Secondary Education Khyber Pakhtun Khwa at Peshawar.
  3. District Education officer (Male) Swat
  4. District Accounts officer, Saidu Sharif Swat.
- ..... Respondents.

**Parawise Comments on Behalf of the Respondent No.2 & 3**

**Respectfully shewith**

**Preliminary objections**

1. That the petitioners are not aggrieved persons within the meaning of Article 199 of the constitution of Islamic republic of Pakistan.
2. That the petitioners have no cause of action / locus standi, because the petitioners have two alternate remedies in the shape of filling an appeal/ representation for redressal of their grievances (if any) and then the learned service tribunal has exclusive domain to resolve the matters founded on the terms and conditions of the service, hence without exhausting these remedies, the instant petition is not maintainable.
3. That the petitioners have not come to this honourable court with clean hands.
4. That the petitioners have filled this instant writ petition just to pressurize the respondents.
5. That the instant Writ petition is against the prevailing law and rules.
6. That the petitioners have filled the instant Writ petition on malafide motives.
7. That the instant Writ petition is not maintainable in the present form and above in the present circumstances of the issue.
8. That the fact in issue pertains to the terms and conditions of the service, hence, the jurisdiction of this honourable court is specifically ousted under the expressed provisions of Article: 212 of the constitution.
9. That the petitioner has concealed the material facts from this honourable court.

**FACTS**

1. That the Para No.1 is correct.
2. That the Para No.2 is correct to the extent of the vacant posts, however only 20 % quota is reserved for promotion to SST from amongst Primary School Head Teachers/Senior Primary School Teachers/Primary School Teachers with at least seven years service as such.
3. That the Para No.3 is correct. However they have not the relevant seven years experience on the post of PST.
4. That the Para No.4 is incorrect, the petitioners have been promoted to the post of Secondary School Teacher.
5. That the Para No.5 is correct.
6. That the Para No.6 is irrelevant, hence, no comments.
7. That the Para No.7 is the repetition of the above Para, hence, no comments.
8. That the Para No.8 is correct to the extent of the withdrawal order, the rest of the Para is incorrect and not admitted. According to the policy, twenty percent from amongst Primary School Head Teachers will be promoted with at least seven years service. Provided that if no suitable candidate is available from amongst the primary school Head teachers for promotion then the post shall be filled by promotion, on the bases of

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seniority-cum-fitness, from the amongst senior primary school teachers with at least seven years service as senior primary school teacher as such. Provided Further that if no suitable candidate is available from amongst Senior primary school teachers for promotion then the post shall be filled by promotion, on the bases of seniority-cum-fitness, from the amongst primary school teachers with at least seven years service as such. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment. (Policy as

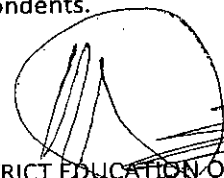
Annexure A)


- 9. That detail reply has been given in Para No.8 above.
- 10. That the Para No. 10 is incorrect and not admitted. The petitioners have two alternate remedies in the shape of filling an appeal/ representation for redressal of their grievances (if any) and then the learned service tribunal has exclusive domain to resolve the matters founded on the terms and conditions of the service, hence without exhausting these remedies, the instant petition is not maintainable. That the instant Writ petition of the petitioner is bereft of any merit hence, liable to be dismissed inter-alia following grounds.

GROUNDS

- A. That the Para No. A is incorrect and not admitted. The withdrawal order of the petitioners in not illegal, voliative or null.
  - B. That the Para No.B is incorrect and not admitted. The term used in policy is quiet clear which is as "at least seven years service as such" which means that only the service as PSHT/SPST/PST is acceptable. There are no provisions for the services in private schools.
  - C. That the Para No.C is correct, however subject to eligibility which is at least seven years service. More over as stated in the foregoing Paras, if no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
  - D. That the Para No. D is irrelevant, hence no comments.
  - E. That the Para No. E is incorrect and not admitted. The petitioners are working in the respondent department as PSTs; they have not been deprived of their previous posts as PST.
  - F. That the Para No. F is absolutely incorrect and not admitted. The petitioners are working as PST BPS-12 not BPS-16. As far as participation in the process of the posts advertised through Public service commission or NTS is concerned it is irrelevant, Hence no comments.
  - G. That the Para No. 7 is incorrect and not admitted. That the fact in issue pertains to the terms and conditions of the service, hence, the jurisdiction of this honourable court is specifically ousted under the expressed provisions of Article: 212 of the constitution.
  - H. That the Para No.H is irrelevant, hence No comments.
- It is therefore very humbly prayed that the instant writ petition of the petitioner may be dismissed with cost in favour of the respondents.

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 DISTRICT EDUCATION OFFICER (M)  
 SWAT AT GULKADA

  
 DIRECTOR ELEMENTARY & SECONDARY  
 EDUCATION KPK PESHAWAR

(29)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWAT AT GULKADA

OFFICE ORDER

The mutual transfer of the following SST is hereby ordered to the school noted against each on their own pay and scale from the date of their taking over charge in the interest of public service.

| S.NO | NAME OF TEACHER/<br>POST | FROM              | TO                | REMARKS     |
|------|--------------------------|-------------------|-------------------|-------------|
| 1    | Noorul Ahad, SST(S-II)   | GHS No. 1 Mingora | GHSS Miandam      | Vice S.No.2 |
| 2    | Fazal Khaliq, SST(S-II)  | GHSS Miandam      | GHS No. I Mingora | Vice S.No.1 |

Note: - 1. No. TA/DA is allowed.

2. Charge reports should be submitted to all concerned.

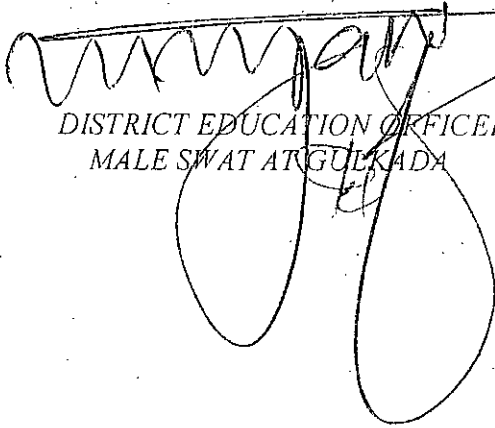
(NAWAB ALI)  
DISTRICT EDUCATION OFFICER  
MALE SWAT AT GULKADA

Endst.No. 1286-88 /Transfer/SST

Dated. 13 / 8 / 2018

Copy to the:-

1. District Comptroller of Accounts Swat at Saidu Sharif.
2. Principal/Headmasters Concerned.
3. Budget & Accounts Officer Local Office.
4. Teachers, Concerned.
5. PA to DEO Local Office.

  
DISTRICT EDUCATION OFFICER  
MALE SWAT AT GULKADA

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWAT AT GULKADA

ADJUSTMENT

Consequent upon non availability of SST S-II post/position code at GHSS Miandam Swat, the undersigned is please to adjust Mr. Noorul Ahad Mian SST (S-II) of the above school at GHS No. 1 Mingora Swat against vacant post of SST-2 with immediate effect in the interest of public service

NOTE: - 1.No TA/DA is allowed.

2. Charge reports should be submitted to all concerned.

(NAWAB ALI)

DISTRICT EDUCATION OFFICER  
(MALE) SWAT AT GULKADA

Endst.No. 1170-73 /SST/Adjustment

Dated. 9/8/ /2018

Copy to the:-

1. District Accounts Officer Swat at Saidu Sharif.
2. Principal, GHSS Miandam Swat
3. Headmaster, GHS No. 1 Mingora Swat.
4. PA to DEO Local Office.
5. Teacher Concerned.

DISTRICT EDUCATION OFFICER  
(MALE) SWAT AT GULKADA

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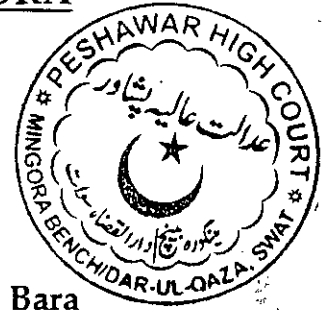
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**BEFORE THE PESHAWAR HIGH COURT, MINGORA**  
**BENCH, SWAT**

(Original Jurisdiction)

W.P No. 627 M/2017



1. Yousaf Ali Shah s/o Muhammad Rahim r/o Bara Dureshkhela District Swat.
2. Noor-ul-Ahad Mian s/o Mian Muhammad r/o Serai Jukhtai Miandam, District Swat.

.....Petitioners

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Saidu Sharif, Swat.
4. District Accounts Officer, Saidu Sharif Swat.

.....Respondents

**WRIT PETITION UNDER ARTICLE**  
**199 OF THE CONSTITUTION OF**  
**ISLAMIC REPUBLIC OF PAKISTAN,**  
**1973:**

**ATTESTED**

Examiner  
Peshawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.

**Respectfully Sheweth:**

Brief facts giving rise to the instant petition are as under;

1. That petitioners are regular employees of Elementary & Secondary Education Department Khyber Pakhtunkhwa, who

FILED TODAY

07 SEP 2017

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JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT,  
MINGORA BENCH (DAR-UL-QAZA), SWAT  
(Judicial Department)

W.P. No. 627-M/2017  
With Interim Relief  
& CM No. 1447/2018

JUDGMENT

Date of hearing: 16.04.2019

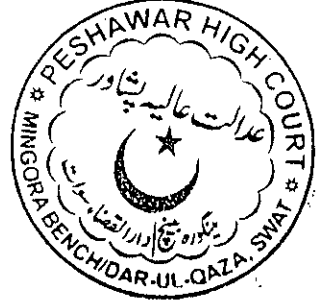
Petitioners:- (Yousaf Ali Shah & another) by  
Barister Dr. Adnan Khan.

Respondents:- (Govt: of KPK and others) by  
Mr. Rahim Shah, Astt: Advocate General.

SYED ARSHAD ALI , J.- Through the instant writ petition, the petitioners seek constitutional jurisdiction of this Court with the following prayer:-

*"It is, therefore humbly prayed that on acceptance of this petition, the impugned order Endst: No. 4485-90 be declared as illegal, the same may also be set aside. Consequently, it may be ordered that the petitioners shall continue their services as SST (BPS-16) as per law of the land. Any other remedy, though may not specifically prayed for but which the ends of justice would demand in the circumstances, may also be granted."*

2. In essence, the grievances of the petitioners are that when they were promoted by the competent authority to the post of Secondary School Teacher (BPS-16) on the recommendations of the Departmental Promotion Committee, then the



**ATTESTED**

Examiner  
Peshawar High Court Bench  
Mingora Dar-ul-Qaza, Swat.

NAWAB DB: Mr. Justice-Rooh-ul-Amin Khan  
Mr. Justice Syed Arshad Ali

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respondents had no right to pass the impugned order, whereby their promotion was withdrawn.

3. The learned counsel for the petitioners has argued that since the petitioners were promoted on the recommendations of the Departmental Promotion Committee, hence their order of promotion could only be withdrawn by the said Departmental Promotion Committee and not by the respondent No. 2. In this regard, he has placed reliance on "Muhammad Israr, ASI and 138 others v/s Govt. of Khyber Pakhtunkhwa and others (2017 PLC (C.S.) 1128).

4. Be that as it may, the matter essentially relates to the enforcement of terms and conditions of civil servants, hence in view of the clear jurisdictional bar contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 ("*Constitution*"), this Court has no jurisdiction to entertain any petition relating to the enforcement of terms and conditions of the civil servants. Hence, this petition being not maintainable is dismissed as such along with CM.

Announced  
Dt: 16.04.2019

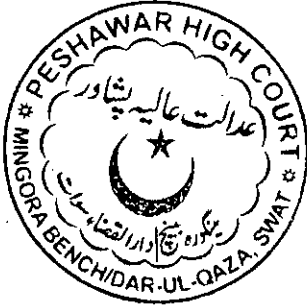
*Rooh-ul-Amin*  
JUDGE

*Syed Arshad Ali*  
JUDGE

NAWAB DB: Mr. Justice Rooh-ul-Amin Khan  
Mr. Justice Syed Arshad Ali

Office  
18/04/2019

C.T.C  
*Ali*



S.No. .... 19  
Name of Applicant ..... *Arshad Ali*  
Date of Presentation of Application ..... 19-4-19  
Date of Completion of Copies ..... 19-4-19  
No of Copies ..... 23  
Urgent Fee .....  
Fee Charged .....  
Date of Delivery of Copies ..... 19-04-19

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EXAMINER

Peshawar High Court, Mingora/Dar-ul-Qaza, Swat  
Announced Under Article 87 of Qanoon-e-Shahadat Order 1934

(34)

Annex J

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION SWAT AT GUL KADA

OFFICE ORDER

Consequent upon the meeting of the District Selection Committee held on 21.05.2012 Under the chairmanship of the Executive District Officer Elementary & Secondary Education Swat, the undersigned being competent authority is pleased to issue appointment order of the following candidates against DM vacant post and posted at the school noted against each in BPS: 09 (Rs. 6200-380-17600) plus usual allowances as due and admissible to them under the Rules except section No.19 of Khyber Pukhtun Khwa Rule 1973 subject to the following terms & conditions.

DM MALE 50 % OPEN MERIT

|    |   |                        |                  |
|----|---|------------------------|------------------|
| 1  | Mr. Noor Muhammad S/o Muhammad Rashid     | Gharib Abad Kariju     | GHS: Labar       |
| 2  | Mr. Hamidullah S/o Shah Jehan             | Manglor                | GMS: Chuan Garai |
| 3  | Mr. Arshad Iqbal S/o Amir Zaman           | J/C GGHS: Aboha        | GHS: Kedam       |
| 4  | Mr. Ghani Akbar S/o Abdul Kabir           | Tita Bat Khwaza Khela  | GHS: Chuprial    |
| 5  | Mr. Rashid Ahmad Khan S/o Ghulam Muhammad | Damana Madyan          | GHS: Qandil      |
| 6  | Mr. Wali Ahmad S/o Rashid Ahmad           | Langar Khwaza Khela    | GMS: Fazil Banda |
| 7  | Mr. Amir Ullah S/o Habib Khan             | Landay Dakorak         | GMS: Charma      |
| 8  | Mr. Iqbal Hussain S/o Muhammad Room       | Mian Gul Abad Charbagh | GHS: Pindha      |
| 9  | Mr. Samiullah S/o Ashnagaray              | Village & Po Manglor   | GMS: Drola       |
| 10 | Mr. Rehan S/o Shah Nawaz                  | Chuprial               | GHS: Gwama       |

TERMS & CONDITIONS:

- The amended section 19 will be applicable in case of civil servants who were appointed to a pensionable post on regular basis before 1<sup>st</sup> day of July 2001, having regular service without any break and have applied through their department shall be given an option either to retain the benefit of pension and gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident Fund allowed to them under their new appointment.
- All Degrees/ Certificates will be verified from the concerned Board/ University by the DDO concerned on the expenses of the candidate concerned within one month after taking over charge.
- The new appointee should submit challan / bank draft in the name of contractor of Examination of the concerned Board/ University along with photocopies of the testimonials to the DDO concerned for verification within FIFTEEN DAYS after taking over charge.
- In case any certificate/ Degree found incorrect/ fake or unverified the appointment of the candidate concerned shall be cancelled automatically.
- The original certificate /Degree and health & age certificate of the candidate should be checked before handing over charge to him by the head of the concerned school.
- They will not be handed over charge if their age is less than 18 years or more than 38 years. Charge report should be submitted to all concerned.
- They will be governed by terms and conditions as prescribed by the government from time to time.

**CERTIFIED TO BE TRUE COPY**

Barrister

*Dr. Abrar Khattak*  
Advocate High Court

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BETTER COPY (OF RELEVANT TEXT)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY  
& SECONDARY EDUCATION SWAT AT GULKADA

OFFICE ORDER:

Consequent upon the meeting of the District Selection Committee held on 21.05.2012 under the chairmanship of the Executive District Officer Elementary & Secondary Education Swat, the undersigned being competent authority is pleased to issue appointment order of the following candidates against DM vacant post and posted at the school noted against each in BPS-09 (Rs.6200-380-17600) plus usual allowances as due and admissible to them under the Rules except section No.19 of Khyber Pukhtunkhwa Rule 1973 subject to the following terms & conditions.

DM MALE 80% OPE N MERIT

|    |   |                        |                 |
|----|---|------------------------|-----------------|
| 1  | Mr. Noor Muhammad S/o Muhammad Rashid     | Gharib Abad Kanju      | GHS Labat       |
| 2  | Mr. Hamidullah s/o Shah Jehan             | Manglor                | GMS Cham Gharai |
| 3  | Mr. Arshad Iqbal s/o Amir Zaman           | J/C GGHS Aboha         | GHS Kedam       |
| 4  | Mr. Ghani Akbar s/o Abdul Kabir           | Tita Bat Khwaza Khela  | GHS Chuprial    |
| 5  | Mr. Rashid Ahmad Khan s/o Ghulam Muhammad | Damana Madyan          | GHS Qandil      |
| 6  | Mr. Wali Ahmad s/o Rashid Ahmad           | Langar Khwaza Khela    | GMS Fazil Banda |
| 7  | Mr. Amir Ullah s/o Habib Khan             | Landay Dakorak         | GMS Charma      |
| 8  | Mr. Iqbal Hussain s/o Muhammad Rome       | Mian Gul Abad Charbagh | GHSS Baidara    |
| 9  | Mr. Samiullah s/o Ashnagaray              | Village & PO Manglor   | GMS Drolai      |
| 10 | Mr. Rehan s/o Shah Nawraq                 | Chuprial               | GHS Gwalerai    |

CERTIFIED TO  
BE TRUE COPY

*Dr. Adnan Khan*  
Barrister  
Advocate High Court

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OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
Swat

(Cell # 0946 9240209-228)

**NOTIFICATION.**

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the notification Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide his Office Endst: No.965-71/File No.2/Promotion SST BPS-16 dated Peshawar the 03.07.2015 and No.3745-52 F.No.2/Promotion SST B-16 dated 15.07.2015 Government of the Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance department Endorsement NO.SO(FR)/FD/10-22 N(E)/2010 Dated 16.07.2012, the following Male S.CT, PSHT/SPST/PST, S.DM, S.AT, STT are hereby promoted to the post of SST BPS-16 (10000-800-34000) plus usual allowances as admissible under the rules on regular basis and school based under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further they are adjusted in the school noted against their name against the newly upgraded Senior S.DM BPS-16 Posts in the interest of public service.

**A. SST-I (Bio-Chem)**

| S# | Name of Teacher          | Present place of duty in | School where adjusted in B-16 | Remarks                   |
|----|--------------------------|--------------------------|-------------------------------|---------------------------|
| 1  | Mr. Fazal Ghaffar S.CT   | GHS, Shawar              | GHS, Sijbanr                  | Against SST-I vacant post |
| 2  | Mr. Fazal Subhan S.CT    | GHSS, Mingora            | GHSS, Mingora                 | -do-                      |
| 3  | Mr. Khandan S.CT         | GHS, Chamtalai           | GHS, Tarogay                  | -do-                      |
| 4  | Mr. Ihsanullah SPST      | GPS, Gul Kada            | GHS, Amankot                  | -do-                      |
| 5  | Mr. Haider Ali SPST      | GPS, Totano Bandai       | GHS, Totano Bandai            | -do-                      |
| 6  | Mr. Fazal Akbar SPST     | GPS, Deran Patay Matta   | GHS, Barawal                  | -do-                      |
| 7  | Mr. Javed Mian SPST      | GPS, Ossar               | GHS, Sher Palam               | -do-                      |
| 8  | Mr. Nasarullah Khan SPST | GPS, Totano Bandai       | GHS, Kanju                    | -do-                      |
| 9  | Mr. Sher Alam Khan SPST  | GPS, Mashu Banda         | GHS, Nazar Abad               | -do-                      |
| 10 | Mr. Attaullah SPST       | GPS, Tanghanr            | GHS, Sakhra                   | -do-                      |
| 11 | Mr. Rahmat Qajum SPST    | GPS, Mirjanai            | GHS, Sirsenai                 | -do-                      |
| 12 | Mr. Muhammad Fayoon PSHT | GPS, Sharif Abad Kabal   | GHSS, Kabal                   | -do-                      |

**B. SST-II (PHY: MATHS)**

|    |                           |                     |                     |                            |
|----|---------------------------|---------------------|---------------------|----------------------------|
| 13 | Mr. Habibullah Khan S.CT  | GHS, Tali           | GHS, Taran          | Against SST-II vacant post |
| 14 | Mr. Mahboob Ali Shah S.CT | GHSS, Kabal         | GHSS, Kabal         | -do-                       |
| 15 | Mr. Fazal Wadood S.CT     | GHS, Kas Shingrai   | GHS, Ser            | -do-                       |
| 16 | Mr. Ihsanullah S.CT       | GHS, No. 4 Mingbora | GHS, No. 4 Mingora  | -do-                       |
| 17 | Mr. Muhammad Khan S.CT    | GHS, Manai          | GHS, Asharay        | -do-                       |
| 18 | Mr. Gul Faraz Khan S.CT   | GHS, Deolai         | GHS, Deolai         | -do-                       |
| 19 | Mr. Khalid Khan S.CT      | GHS, No. 3 Mingora  | GHS, No. 3 Mingorta | -do-                       |
| 20 | Mr. Bashir Ahmad S.CT     | GHS, Nazar Abad     | GHS, Sher Palam     | -do-                       |
| 21 | Mr. Inayatullah SPST      | GPS, Ganorai        | GHS, No. 3 Mingora  | -do-                       |

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Barrister

صداقت بک سیکرٹری ایڈمنسٹریشن  
لیات پلازہ سیدوردوز و ملا بابا کلا  
کوہستان

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|                         |                                  |                    |                     |   |
|-------------------------|----------------------------------|--------------------|---------------------|---|
| 22                      | Mr. Samiullah SPST               | GPS, Shah Dehrai   | GHS, Shah Dehrai    | -do-  |
| 23                      | Mr. Fayaz Ahmad SPST             | GPS, Sinpora       | GHS, Shawar         | -do-  |
| 24                      | Mr. Muhammad Javed SPST          | GPS, Sinpora       | GHS, Labat          | -do-  |
| 25                      | Mr. Niaz Ahmad SPST              | GPS, Ditpanai      | GHS, Matta          | -do-  |
| 26                      | Mr. Naeem Anwar Shah SPST        | GPS, Nasrat        | GHS, Shalhand       | -do-  |
| 27                      | Mr. Ghani Akbar D.M              | GHS, Baboo         | GHSS, Kalam         | -do-  |
| 28                      | Mr. Anwar Ali S. CT              | GHSS, Barikot      | GHS, Kanju          | -do-  |
| 29                      | Mr. Taj Bacha SPST               | GPS, Gadi Kabal    | GHS, Shah Dehrai    | -do-  |
| 30                      | Mr. Muhammad Saleem SPST         | GPS, No.1 Odigram  | GHS, Amankot        | -do-  |
| 31                      | Mr. Hidayatur Rahman SPST        | GPS, Barikot       | GHS, No.3 Mingora   | -do-  |
| 32                      | Mr. Ihsanullah SPST              | GPS, Kandowgay     | GHS, Asala          | -do-  |
| 33                      | Mr. Sardar Ali SPST              | GPS, Tindodag      | GHS, Chitawar       | -do-  |
| 34                      | Mr. Muhammad Khan SPST           | GPS, Enzar Kolalai | GHS, Sakhra         | -do-  |
| <b>C. SST (GENERAL)</b> |                                  |                    |                     |   |
| 35                      | Mr. Muhammad Zarin Farooqi S. CT | GCMHS, Wadudia     | GCMHS, Wadudia      | Vice M. Amin SST proceeding on retiring w.e.f 1/8/2015. |
| 36                      | Mr. Jftikhar Ahn ad S. CT        | GHSS, Mingora      | GH, Parrai          | Against vacant SST(G) Post -do-                         |
| 37                      | Mr. Syed Khurshid Ali S. CT      | GHS, No.3 Mingora  | GHS, Dardyal        | -do-  |
| 38                      | Mr. Umar Ali S. CT               | GHS, Islompur      | GMS, Azad Banda     | -do-  |
| 39                      | Mr. Muhammad Saleem Khan S. CT   | GHSS, Mingora      | GMS, Areen          | -do-  |
| 40                      | Mr. Jamshid Khan S. CT           | GHS, Chail         | GHS, Chail          | -do-  |
| 41                      | Mr. Shamsul Wahab PSHT           | GPS, Totano Bandai | GHS, Totano Bandai  | -do-  |
| 42                      | Mr. Abdul Shakoor PSHT           | GPS, Sirsenai      | GPS, Tall           | -do-  |
| 43                      | Mr. Bahri Karan PSHT             | GPS, No.3 Mingora  | GHS, Kidam          | -do-  |
| 44                      | Mr. Muhammad Ishaq S. DM         | GHS, Totano Bandai | GHS, Qalagay        | -do-  |
| 45                      | Mr. Sultan Muhammad S. AT        | GHSS, Charbagh     | GHS, Banjot         | -do-  |
| 46                      | Mr. Muhammad Ishaq S. TT         | GHS, Qambar        | GHSS, Shannoza      | -do-  |
| 47                      | Mr. Haroon Bacha S. CT           | GHS, Matta         | GHS, Gal Shawar     | -do-  |
| 48                      | Mr. Ghawas Al. Khan S. CT        | GHS, Bamakhela     | GMS, Poochar        | -do-  |
| 49                      | Mr. Hazrat Hussain S. CT         | GHSS, Mingora      | GHS, Sakhra         | -do-  |
| 50                      | Mr. Toti Rahmin S. CT            | GHS, No.1 Mingora  | GHS, Dardyal        | -do-  |
| 51                      | Mr. Muhammad Yaqoob Khan S. CT   | GHS, Balogram      | GHS, Khazana        | -do-  |
| 52                      | Mr. Fazal Wadood S. CT           | GHS, Bandai        | GHS, Bandai         | -do-  |
| 53                      | Mr. Azizullah S. CT              | GHS, Ningolai      | GMS, Bajar          | -do-  |
| 54                      | Mr. Hidayatullah S. CT           | GHS, Matta         | GHS, Shawar         | -do-  |
| 55                      | Mr. Hamayun S. CT                | GHSS, Mingora      | GMS, Balokalay      | -do-  |
| 56                      | Mr. Muhammad Amin PSHT           | GPS, Serai Barikot | GHS, Manai          | -do-  |
| 57                      | Mr. Fazal Ahad PSHT              | GPS, Tall          | GHS, Tall           | -do-  |
| 58                      | Mr. Ihsanullah PSHT              | GPS, Tangi Shalpin | GHS, Ashoran        | -do-  |
| 59                      | Mr. Shafiqur Rahman PSHT         | GPS, No.1 Toha     | GMS, Koo Malam Jaha | -do-  |
| 60                      | Mr. Nadar Khan PSHT              | GPS, Sarkhuna      | GHS, Kidam          | -do-  |

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|----|------------------------|-----------------|--------------|------|
| 61 | Mr. Nisar Ahmad PSHT   | GPS, Aligrama   | GHS, Laikot  | -do- |
| 62 | Mr. Pashmin S. DM      | GHS, Tarogay    | GHS, Topsin  | -do- |
| 63 | Mr. Fazal Malik S. IT  | GHS, Chamatalai | GHS, Shalpin | -do- |
| 64 | Mr. Liaqat Ali S. Qari | GHS, Shin       | GMS, Anakar  | -do- |

**TERMS & CONDIATION.**

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt. :
3. Their Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed time to time.
4. Charge report should be submitted to all concerned in duplicate.
5. Their Inter-Se-seniority on lower post will remain intact.
6. No. TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their Service Book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Prof. MUHAMMAD UZAIR ALI)  
DISTRICT EDUCATION OFFICER (MALE)  
SWAT GUL KADA

Endst No: 6872 - 79

dated: 23/07/2015

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Account Swat.
3. The Deputy DEO (M) local Office.
4. The Principal/Head Master Concerned.
5. The Supdt. Secy: local Office.
6. The B&AO local Office.
7. The Candidates concerned.
8. PA to DEO Local Office.

صدقات بیک سیکرٹری ایڈمنسٹریٹو  
لیاقت پلازہ سید درویش بازار بابا سہیل  
مکھڑہ سوات

DISTRICT EDUCATION OFFICER (MALE)  
SWAT GUL KADA


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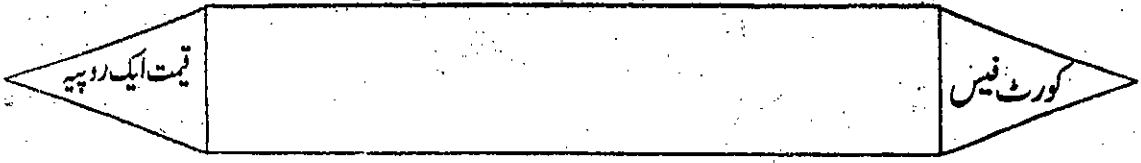
Barrister  
Dr. Adnan Khan  
Advocate High Court

Page 3 of 3

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بعدالت  حنیبر نختونخواہ سروکس ٹریبونل پشاور

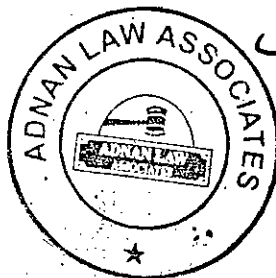


مورخہ 22 اپریل 19۹۰ء منجانب اسپلانٹ  
مقدمہ نورا الاحد بنام حکومت وغیرہ  
دعویٰ سروکس اسپل جرم  
باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور/ کیمپ کورٹ سوات کے سرمد بیبر سردا لٹر عزیزان خان مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی نقل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے کو جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے المرقوم 22 ماہ اپریل 19۹۰ء

العبد گ واہ شہد العبد

کے لئے منظور ہے



بمقام پشاور/ سوات

Barrister  
Dr. Adnan Khan  
Advocate Supreme Court of Pakistan

نورالاحد سوات وکل سوات

**BEFORE THE KHYBER PAKTUN KHWA SERVICE TRIBUNAL AT CAMP COURT  
SWAT.**

Service Appeal No. 539/2019

Noorul Ahad Mian S/O Mian Muhammad R/O Serai Jukhtai Miandam District  
Swat. ....Appellant

**Versus**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and secondary education Khyber Pakhtunkhwa at Peshawar.
3. District Education officer (Male) Swat.

.....Respondents.

**Parawise Comments on Behalf of the Respondents**

**Respectfully shewith**

**Preliminary objections**

1. That the appellant is not an aggrieved person within the meaning of section 4 of the service tribunal Act, 1974.
2. That the appellant has no cause of action / locus standi.
3. That the appellant has not come to this honorable court with clean hands.
4. That the appellant has filed this instant service appeal just to pressurize the respondents.
5. The present service appeal is liable to be dismissed for non-joinder/miss joinder of necessary parties.
6. That the instant service appeal is against the prevailing law and rules.
7. That the appellant has filed this instant Writ service appeal on malafide motives.
8. That the instant service appeal is not maintainable in the present form, and above in the present circumstances of the issue.
9. That the appellant <sup>is</sup> ~~has~~ estopped by his own conduct.
10. That the appellant has concealed the material facts from this honorable tribunal.

**FACTS**

1. That the Para No.1 is correct.
2. That the Para No.2 is correct to the extent of vacant posts, however, only 20 % quota is reserved for promotion to SST from amongst Primary School Head Teachers/ Senior Primary School Teachers/ Primary School Teachers with at least seven years service as such.

3. That the Para No.3 is correct. However, he had not the relevant seven years experience on the post of PST.
4. That the Para No.4 is correct to the extent of the posting of the appellant, however, his promotion order was withdrawn later on due to lacking the relevant/ mandatory experience.
5. That the Para No. 5 is correct, however, the detail reply of this Para has been given in the foregoing Paras.
6. That the Para No.6 is incorrect and not admitted. According the policy, 20 % from amongst Primary School Head Teachers will be promoted with at least seven years service. Provided that if no suitable candidate is available from amongst the Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Primary School Teachers with at least seven years service as Senior Primary School Teacher as such. Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Teachers with at least seven years service as such. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment. **(Policy as Annexure A)**
7. That the Para No.7 is incorrect and not admitted. The seven years experience is the minimum requisite experience on the mentioned above posts for promotion to SST.
8. That the Para No.8 is correct to the extent of the appeal. However his appeal was not been accepted on the reasons that he was lacking the mandatory seven years experience.
9. That the Para No.9 is correct.
10. That the Para No.10 is correct. However their writ petition was dismissed later on, on the grounds of jurisdiction.
11. That the Para No.11 is correct.
12. That the Para No.12 is correct.
13. That the instant service appeal of the appellant is bereft of any merit, hence liable to be dismissed inter alia following grounds.

### **GROUND**

- A. That the Para No. A is incorrect and not admitted. The impugned order is not illegal, unilateral and violative of due process. The respondent department has acted upon the rules framed by the provincial Government.
- B. That the Para No. B is incorrect and not admitted. The stance of the appellant in this Para is quite astonishing. No one can claim promotion on the basis of experience of any private school. The

wording of the policy is very much clear. 20 % quota for promotion has been reserved from amongst the PSHT/SPST/PST with at least seven years service as such. There are no provisions for the experience of private schools.

- C. That the Para No. C is incorrect and not admitted. As stated in the foregoing Paras, it is clearly mentioned in the said policy that if suitable candidates are not available in the relevant cadre, then the posts shall be filled by initial recruitment.
- D. That the Para no. D is irrelevant, hence no comments.
- E. That the Para No.E is incorrect and not admitted. There was no policy for promotion from amongst PSTs to SST before the said policy. On the one hand the appellant claims promotion on the basis of the said policy and on the other hand he made the said policy as impugned.
- F. That the Para No.F is irrelevant to the present issue, hence no comments.
- G. That the Para No. G is irrelevant, hence no comments. However respondents also seek permission of this Honorable Tribunal to raise further grounds at the time of arguments.

It is, therefore, very humbly prayed that the instant service appeal of the appellant may be dismissed with cost in favor of the respondents.

*Verdict*

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DISTRICT ATTORNEY  
SWAT  
20.7.18

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DISTRICT EDUCATION OFFICER (M)  
SWAT AT GULKADA

*[Handwritten signature]*  
DIRECTOR,

ELEMENTARY AND SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA

*[Handwritten signature]*  
SECRETARY,

ELEMENTARY AND SECONDARY  
EDUCATION PESHAWAR



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

Peshawar, dated the 24<sup>th</sup> July, 2014.

**NOTIFICATION**

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

**AMENDMENTS**

**In the Appendix,-**

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

| 1  | 2                           | 3  | 4              | 5  |
|----|-----------------------------|--|----------------|--|
| 1. | Subject Specialist (BPS-17) | <p>i. At least second class Master's Degree or four years BS Degree in the relevant subject; and</p> <p>ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.</p> | 23 to 35 years | <p>(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.</p> <p><b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial</p> |

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Barrister  
*Dr. Adnan Khan*  
Advocate High Court

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|    |                                      |   |             | recruitment; and<br>(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:<br><br>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;<br><br>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<br><br>(b) fifty percent by initial recruitment"; and |

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 Barrister  
 Dr. Adnan Khan  
 Advocate High Court

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*[Signature]*

(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);<br/>Or<br/>(b) (Physics, Maths "A" or "B" or Statistics)<br/>Or<br/>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p> | 21 to 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>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> |

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Advocate High Court

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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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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;

- (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:

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;

- (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:

Provided that if no suitable candidate is available from amongst

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Barrister  
*Dr. Adnan Khan*  
Advocate High Court

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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty Five percent by initial recruitment.

**Note:**

I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.

✓ II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. 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

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Barrister  
Dr. Adnan Khan  
Advocate High Court

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(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

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