

18.08.2022

Tour to camp court Abbottabad has been cancelled, therefore, the case is adjourned on 20.10.2022 for the same.

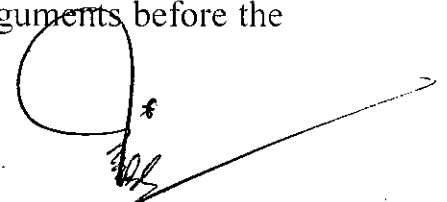


READER

20.10.2022

Nemo for the appellant. Mr. Muhammad Jan, District Attorney alongwith Mr. Sohail Ahmed Zeb, Litigation Officer for the respondents present and submitted reply/comments which are placed on file.

Previous date was changed on the strength of Reader's Note, therefore, notice be issued to the appellant as well as his counsel to attend the court on the next date. Adjourned. To come up for cost of Rs. 3000/ as well as arguments before the D.B on 26.12.2022.




(Mian Muhammad)
Member (E)

20.04.2022

Learned counsel for the appellant present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present and requested for time for submission of written reply/comments.

Respondents are directed to submit their written reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck off. To come up for submission of written reply/comments on 14.06.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)
Member (J)

Camp Court Abbottabad

14.06.2022

Appellant in person present. Mr. Adeel Butt, Additional Advocate General alongwith Inayat Rehman, Assistant Legal for the respondents present.

Last chance was given to the respondents but today learned Additional Advocate General again requested for adjournment. Requested accepted subject to cost of Rs. 3000/- to be paid on behalf of respondents. Adjourned. To come up for written reply/comments on 18.08.2022 before S.B at Camp Court Abbottabad.

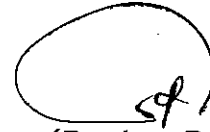


(Fareeha Paul)
Member (E)
Camp Court A/Abad

28.09.2021

Nemo for appellant.

Notice be issued to appellant for 21 / 12 / 2021 for preliminary hearing, before S.B at Camp Court, Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

21.12.2021

Nemo for the appellant. Notice for prosecution of the appeal be issued to the appellant and to come up for preliminary hearing on 19.01.2022 before the S.B at Camp Court Abbottabad.



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

19.01.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 20.04.2022 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

21/01/22



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

22.10.2020

Representative of appellant on behalf of appellant present.

Lawyers are on general strike, therefore case is adjourned to 18.01.2021 for preliminary hearing before S.B at Camp Court, Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

18.01.2021 Due to Covid-19, case is adjourned to 19.04.2021 for the same as before



Reader


19.04.2021 Due to cancellation of tour, Bench is not available. Therefore, case is adjourned to 28.09.2021 for the same as before



Reader.

17.12.2019

Appellant in person present and requested for adjournment. Adjourned to 23.01.2020 for preliminary arguments before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

23.01.2020

Appellant in person present and seeks adjournment as his counsel is not in attendance. Adjourn. To come up for preliminary hearing on 20.02.2020 before S.B at Camp Court Abbottabad.


Member
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on
22 / 10 / 20 at camp court abbottabad.



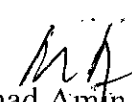


Reader

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- _____

999/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 31/07/2019 | <p>The appeal of Mr. Gohar Nazir received today by post may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 31/7/19</p> |
| 2- | 20.09.2019 | <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20-9-19</u></p> <p> CHAIRMAN</p> |
| | 22.11.2019 | <p>Appellant in person present and requested for adjournment. Adjourned to 22.11.2019 for preliminary hearing before S.B at Camp Court Abbottabad.</p> <p> (Muhammad Amin Khan Kundi) Member Camp Court Abbottabad</p> |
| | | <p>Appellant in person present and seeks adjournment to furnish additional documents. Adjourn. To come up for preliminary hearing on 17.12.2019 before S.B at Camp Court, A/Abad.</p> <p> Member Camp Court, A/Abad</p> |

Camp Court, A/Abad

**BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL
CAMP COURT, ABBOTTABAD**

Service Appeal No: 999 of 2019

Gohar Nazir S/o Gohar Rehman (S.P.E.T) Govt High School
Bagan, Tehsil & District, Abbottabad.

....APPELLANT

Versus


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

....RESPONDENTS

**SERVICE APPEAL
INDEX**

| S. No | DESCREPTION OF DOCUMENTS | ANNEXURE | PAGE NO |
|-------|--|----------|---------|
| 1 | Memo: of Service Appeal alongwith Affidavit | --- | 1 to 6 |
| 2 | (Copy of Service Book of appellant | A | 7-9 |
| 3 | Copies of promotion order as a P.E.T BPS-14 dated 25/06/1997 and adjustment order dated 22/07/1997 | B | 10-12 |
| 4 | Copies of notifications dated 20/07/1987 and order dated 13 /06/1998 | C | 13-15 |
| 5 | Copy of promotion order in BPS-16 of the appellant dated 31/02/2013 by the respondent No.3 | D | 16-17 |
| 6 | Copy of notification by Finance Department Peshawar dated 09/06/1994 | E | 18 |
| 7 | Copy of promotion orders of other P.E.Ts /S.P.E.Ts as a D.P.E dated 02/01/2018 | F | 19-21 |
| 8 | Copy of Appeal under Right to Appeal Rules 1986 | G | 22 |

Dated 30/07/2019


(Gohar Nazir)
(appellant in person)

BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL
CAMP COURT, ABBOTTABAD

Service Appeal No: 999 of 2019

Gohar Nazir S/o Gohar Rehman (S.P.E.T) Govt High School
 Bagan, Tehsil & District, Abbottabad.

Khyber Pakhtunkhwa
 Service Tribunal

Diary No. 1108

Dated 31-7-2019
APPELLANT

Versus

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

....RESPONDENTS

SRVICE APPEAL UNDER SECTION 4 OF NWFP (NOW KHYBER PAKHTUNKHWA) SERVICE TRIBUNAL ACT 1974 FOR PROMOTION OF APPELLANT AS A "D.P.E" BPS-17 WHICH IS NOT BEING GRANTED BY THE RESPONDENTS BUT THE APPELLANT IS ELIGIBLE FOR SAID PROMOTION IN THE LIGHT OF NOTIFICATION NO. FD (PRC)5-1/93 DATED 09/06/1994, WHICH IS ILLEGAL, UNLAWFUL AND WITHOUT LAWFUL JUSTIFICATION.

PRAYER:

IT IS RESPECTFULLY PRAYED BEFORE THIS HONOURABLE TRIBUNAL THAT THE INSTANT APPEAL MAY GRACIOUSLY, BE ACCEPTED AND RESPONDENTS MAY KINDLY BE DIRECTED TO PROMOTE THE APPELLANT AS A D.P.E IN BPS-17 W.E.F. 22/07/1997

Filed to-day
 Registrar

**WITH ALL BACK BENEFITS IN THE LIGHT OF NOTIFICATIONS
DATED 09/06/1994.**

Respectfully Sheweth,

FACTS

- 1) That, the appellant was appointed as (P.S.T) BPS-6, in the Elementary & Secondary Education Department at GPS Longal Khaira Gali, District Abbottabad on 27.10.1981 and presently serving as a "S.P.T" BPS-16 at Govt High School Bagan, Abbottabad. **(Copy of Service Book is attached as Annexure "A")**
- 2) That, on 25/06/1997, appellant was appointed on higher post through proper channel as a "Physical Education Teacher" (P.E.T) in BPS-14 on the basis of the prescribed qualification and adjusted at GHSS Battal, District Mansehra on 22/07/1997. **(Copies of promotion order dated 25/06/1997 and adjustment order dated 22/07/1997 are attached as Annexure "B")**
- 3) That, on 13/06/1998, appellant was promoted from BPS-14 to BPS-15 in the light of notification dated 20/07/1987 issued by Govt of N.W.F.P (Now Khyber Pakhtunkhwa) Education Department Peshawar. **(Copies of notifications dated 20/07/1987 and order dated 13 /06/1998 are attached as Annexure "C")**
- 4) That, the Govt of KPK, Elementary & Secondary Education Department Peshawar, issued a notification vide which all the Physical Education Teacher (P.E.Ts) has been granted BPS-15.

- 5) That, on 11/07/2012, Govt of KPK, Elementary & Secondary Education Department Peshawar, issued a promotion notification for Teaching Cadres under 1/3 Policy.
- 6) That, under 1/3 promotion policy dated 11/07/2012, most of the P.E.T teachers has been promoted from P.E.T (BPS-15) to S.P.T (BPS-16) vide order dated 26/02/2013 issued by respondent No.3 by the approval of respondent No.2, thus, many P.E.T teachers were promoted in BPS-16 who were most Junior from the appellant.
- 7) That, on 31/05/2013, respondent No.3 issued an order of the promotion of appellant from P.E.T (BPS-15) to S.P.T (BPS-16) by the approval of respondent No.2 in the light of the Policy dated 11/07/2012. **(Copy of promotion order dated 31/05/2013 by the respondent No.3 is attached as Annexure "D")**
- 8) That, in the notification dated 09/06/1994, issued by Govt of N.W.F.P (Now Khyber Pakhtunkhwa) it was clearly mentioned that the Selection Grade of the promoted employees, shall be BPS-17, but till now the appellant has not been granted Selection Grad-BPS-17, which is clear cut violation of Article-25 of the Constitution of Islamic Republic of Pakistan. **(Copy of notification by Finance Department Peshawar dated 09/06/1994, is attached as Annexure "E")**
- 9) That, on 02/01/2018, most of the P.E.T / S.P.E.T teachers were promote as a "D.P.E (Director Physical Education) in BPS-17, who

were most junior then the appellant. **(Copy of promotion order dated 02/01/2018, is attached as Annexure "F")**

10) That, on 02/04/2019, appellant submitted an appeal before respondent No.1 under "Right To Appeal Rules 1986" for the redressal of grievances of the appellant which was not honored by the respondent No.1. **(Copy of Appeal under Right to Appeal Rules 1986, is attached as Annexure "G")**

11) That, after passing the statutory period of 90 days and within 120 days of specific period from the submission of departmental remedy / presentation. *Hence this appeal inter-alia on the following grounds:-*

GROUND:

- a) That, the appellant submitted too many application for redressal of the grievances regarding promotion but respondents paid no heed to any of the application submitted by appellant.
- b) That, the respondents openly did the violation of the notification dated 24/08/1983 and not promoted the appellant in the light of said notification.
- c) That, respondents promoted many P.E.T teachers who were most junior then the appellant which is clear violation of Article-25 of the Constitution of Islamic Republic of Pakistan.
- d) That, according the notification dated 09/06/1994, issued by the Finance Department Peshawar, all the P.E.T teachers are eligible for


promotion into BPS-17 on the basis of prescribed qualification i.e. B.A , BSc but inspite of having a prescribed qualification, appellant has not been promoted into BPS-17 by the respondents.

- e) That, the respondents did not read over and follow the Policy of the Govt of N.W.F.P (Now Khyber Pakhtunkhwa) and deprived of the appellant from his basic and fundamental rights.
- f) That, the appellant is badly suffering from the illegal act of the respondents and also faced financial loss.
- g) That, respondents were bound under the law and Police to consider the appeal of appellant but they ignored appeal of appellant which is clear violation of Right to Appeal Rules 1986.
- h) That, the appellant is eligible for promotion as per Rule and Policy and appellant knock at the every door of justice but appellant failed to take justice from any forum.
- i) That, respondents have no right or authority to refuse the promotion of appellant as a D.P.E in BPS-17 which should be granted to the appellant in the light of Notification issued by the Finance Department, KPK, Peshawar.
- j) That, the instant Appeal is well within time and other points shall be raised during the course of arguments with the prior permission of this Hon'ble Tribunal.

PRAYER:

It is, therefore, very humbly prayed that on acceptance of instant Service Appeal, respondents may kindly be directed to promote the appellant as a D.P.E in BPS-17 w.e.f. 22/07/1997 with all back benefits in the light of Notifications dated 24/08/1993 and 09/06/1994 in the best interest of justice. Any other relief which this honourable tribunal deem fit and proper in the circumstances of the case, may also be granted to appellant.

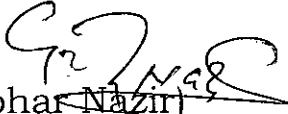
Dated 30/07/2019


(Gohar Nazir)
(Appellant In person)

AFFIDAVIT:

I, Gohar Nazir S/o Gohar Rehman (S.P.E.T) Govt High School Bagan, Tehsil & District, Abbottabad, **Appellant**, do hereby affirm on Oath that contents of instant appeal are correct and true to the best of my knowledge and belief and nothing has been suppressed from this Honourable Tribunal and instant appeal is first appeal and same nature of any other appeal is not pending before this Honourable Tribunal.

Dated 30/07/2019

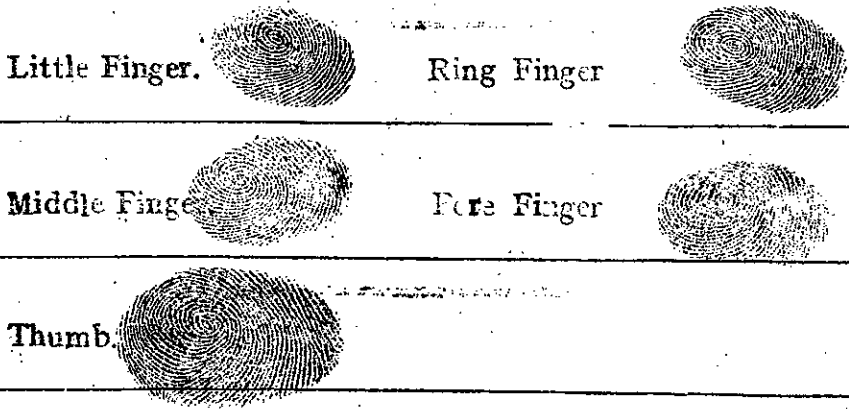
DEPONENT

(Gohar Nazir)
(Appellant In person)

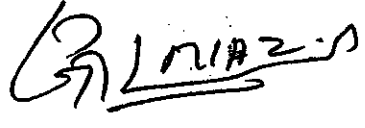
Note—The entries in this page should be renewed or re-attested at least every five years and the signature in lines 9 and 10 should be dated.

- 1. Name .. MR. GOHAR NAZIR
- 2. Race .. KARRAL
- 3. Residence VILL:- NAGRI BALA, P.O:- NAGRI BALA
TEH: DISTT: ABBOTTABAD.
- 4. Father's name and residence .GOHAR-RAHMAN
(AS ABOVE)
- 5. Date of birth by Christian era as nearly as can be ascertained
(1-8-1960) 1st Aug: N.H Sixty)
- 6. Exact height by measurement - 5-7

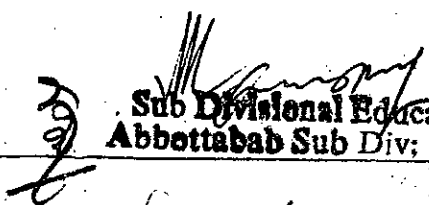
ANNEXURE
A

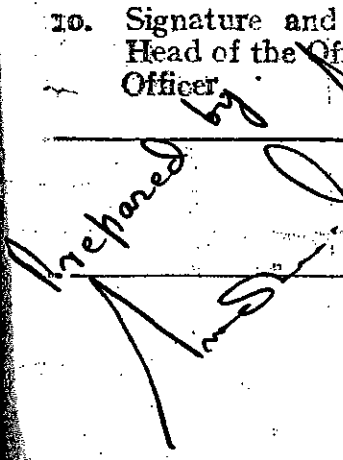
- 7. Personal marks for identification.. A mole on the right side of lips
- 8. Left hand thumb and Finger impression of (non-gazetted) officer ..



9. Signature of Government servant .. 

10. Signature and designation of the Head of the Office, or other Attesting Officer ..


Sub-Divisional Education Officer (M)
Abbottabad Sub Div; Abbottabad

Prepared by

Assistant Sub-Divisional Education Officer (Male)
Abbottabad

REGISTERED

8

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--------------|---|--|-------------------------------|--------------------------------------|--|------------------------|---------------------------------------|
| Name of post | Whether substan- tive or officiating and whether permanent or temporary | If officiating, state (i) substantive appointment or (ii) whether service counts for pension under Art. 371 C. S. R. | Pay in substantive post | Additional Pay for officiating | Other emolument falling under the term "Pay" | Date of appointment | Signature of Government servant |

SCALE No: 6 N. 315.00 (Fixed)

P.T
G. P. S
LOONGAL
(KHAIRA GALI)

Off: Temp

315.00
(Fixed)

27-10
1981

[Signature]

P.T G. P. S
NAGRI MAKOL
N. GALI (ATD)

- do -

315.00

25-10
82 A N

[Signature]

ENTRIES REVISED.

BPS - 7 Rs. 560/- Pm Fixed

B-7

560/-
1560/- Pm Fixed

1 7
83

[Signature]

GPS Nagri Makol Off
PT -
Temp

Director of the Accounts General
N.W.F.P.
Pay fixed by order of Govt dated 1980
of Rs. 560/- fixed B.C. No
of Rs. P.M. w.o.f. 12.88
with next increment on 1.12.88

[Signature]
Accounts Officer
General
N.W.F.P.

ATTESTED

[Signature]

BPS 107 Grade 560-23-1020

560/- Pm 26 5
87

[Signature]

560/- Pm
BPS 7 750 - 31-1370

[Signature]

750/- 7
87

[Signature]

781/- 1 12
87

[Signature]

97

| Office of the head of the office or other attesting officer in attestation of columns 1 to 3 | Termination of appointment (such as promotion, transfer, dismissal, etc). | Signature of the head of the office or other attesting officer. | Period and duration of leave taken | Average pay upto four months for which leave salary is debit to another Government | | Signature of the head of the office or other attesting officer | References to any recorded punishment or censure, or reward or praise of the Government Servant |
|--|---|---|---|--|--|--|---|
| | | | | Period | Government to which debit | | |
| <p>25/10/82</p> <p>25/5/87</p> <p>30/8/87</p> <p>30/12/87</p> | <p>Transfer</p> <p>Grade Revised</p> <p>Passed 100% Exam on 26/5/87</p> <p>grade revised</p> <p>Passed F.A Exam on 4/12/87</p> <p>2-Adverse</p> | <p>S.D.E.O. (M) Abbottabad</p> <p>S.D.E.O. (M) Abbottabad</p> <p>S.D.E.O. (M) Abbottabad</p> <p>S.D.E.O. (M) Abbottabad</p> | <p>25/10/82</p> <p>25/5/87</p> <p>30/8/87</p> <p>30/12/87</p> | <p>Government</p> | <p>Appointed as P.T vide S.D.E.O (M) Abbottabad Office order No: 148 dt 24-10-1981 in Seal No: 6 NS. 315. w/o fixed</p> <p>Services verified from 27-10-81 to 30-11-83 from the Acq: Rolls and other office records,</p> <p>Drawn Arrear Pay of Basis Pay Scale From 1-7-83 To 30-9-83 amounting To Rs 354/-</p> <p>Services verified from 1-12-83 to 30-11-84 from the Acq: Rolls and other office records,</p> | <p>S.D.E.O. (M) Abbottabad</p> <p>S.D.E.O. (M) Abbottabad</p> <p>S.D.E.O. (M) Abbottabad</p> | <p>30/11/83</p> <p>30/11/84</p> <p>30/11/85</p> |

Office of the Government Engineer
N.W.F.P. Pakistan.
Pay fixed in the Revised Pay Scale 1987
of Rs. 750-31-1370 (A7)
@ Rs. 750/25 in W.P.F. 1-7-1987.
with 10% increment on 1-12-1987.

TESTED
CN

S.D.E.O. (M) A. Ahar

30/11/85

843
31
4
87

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|--------------|---|---|-------------------------|--------------------------------|--|---------------------|---------------------------------|
| Name of post | Whether substantive or officiating and whether permanent or temporary | If officiating state (i) substantive appointment, or (ii) whether services counts for pension under Art. 371 C. S. R. | Pay in substantive post | Additional Pay for officiating | Other emolument falling under the term "Pay" | Date of appointment | Signature of Government servant |

| | | | | | | | |
|---|---------|-----|--------------|--|--|----------|------------------|
| LMS G.P.S. Pone Mobile Pone P.T.C. | off/ten | | Rs. 843/- PM | | | 4 12/87 | G.P.S. Pone |
| LMS, Mobile Pone | — | | Rs. 874/- | | | 1 8/88 | G.P.S. Pone |
| do G.P.S. Jora P.T.C. | — | | Rs. 905/- PM | | | 12 1/88 | G.P.S. Jora |
| G.P.S. Kalal Kot P.T.C. | — | | Rs. 905/- PM | | | 12 12/88 | G.P.S. Kalal Kot |
| — | — | | 936/- PM | | | 1 12/89 | G.P.S. Kalal Kot |
| — | — | | 967/- PM | | | 1 12/90 | G.P.S. Kalal Kot |
| Grade: - B-7 = 1095 - 60 - 1995 | | | | | | | |
| — | — | | 1455/- | | | 1 6/91 | G.P.S. Kalal Kot |
| — | — | | 1515/- | | | 1 12/91 | G.P.S. Kalal Kot |
| — | — | (3) | 1695/- | | | 26 3/92 | G.P.S. Kalal Kot |

Two Adv: want on PA and look on CT
 U.S.P. Subordinate
 Pay Band in the Revised Pay Scale 1991
 of Rs. 1455-60-1895 --- (27)
 @ Rs. 1455/- P.M. & P.T.C. 1-8-1991
 With effect from 1-12-1991.

Note following emoluments made may please be recovered

180/2 PM & 26 3/4
 37 2/2 Rs 2914/88
 7 93
 1 3
 1 3

ATTESTED
 CR

10

ANNEXURE
B

OFFICE OF THE DIV: DIRECTOR OF EDUCATION(S) HAZARA DIV: ABBOTTABAD.

NOTIFICATION.

Consequent upon their selection by the Departmental selection committee the Divisional Director of Education(S) Hazara Div; Abbottabad has been pleased to appoint the following PETs(M) Trained candidates at the schools noted against their names in BPS B No.9(Rs.1605-97-3060) in case Ba/BSc II Div: BPS No.14(2065-161-4410) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions:-

| S.No. | Name/Address | D/O Birth | No.of merit | School where posted. | Remarks. |
|-------|---|-----------|-------------|------------------------|--|
| 1. | Goher Nazir PTC GPS Kalsi Nagri Bala ATD Ba/B.P.Ed. | 1.8.60 | 1/50 | GMS Ziarat Bala Hrp | Vice Mr, Mohd Arshad terminated as not selected on merit. |
| 2. | Amir Shrif S/O Mohd Sharif R/O ATD Fa/JDPE. | 5.6.74 | 2/45 | GMS Ghori ATD | Vice Mr, Rukhsar terminated as not selected on merit. |
| 3. | Sabir Khan S/O Zaman Khan R/O Oghi Man: Fa/JDPE | 30.5.75 | 3/45 | GMS Devel Man: | Vice Mr, Fida Hussain terminated as not selected on merit. |
| 4. | Ejaz Ahmad S/O Abdul Khaliq R/O Matseerian Man: Fa/JDPE | 28.12.72 | 4/44 | GMS Bemble KD Man: | Vice Mr, Ejazur Rehman, terminated as not selected on merit. |
| 5. | Thair Mehmood S/O Attai Khan R/O Baffa Fa/JDPE Man: | 2.4.74 | 5/44 | GMS Kangra Colony Hrp: | Vice Mr, M.Rashid terminated as not selected on merit. |
| 6. | M.Khalid S/O Abdul Malik R/O Man: Fa/JDPE | 2.4.71 | 6/42 | GMS Hari Khatir ATD | Vice Mr Habibur Rehman terminated as not selected on merit. |
| 7. | Imtiaz Ahmad S/O Umar khan PET GMS M.M.Khel/Trd: | 4.4.73 | 7/41 | GMS Maira M.Khel KD | post already accupied. |
| 8. | M.Mustajab S/O Bala Khan R/O Nagri Bala ATD Fa/JDPE | 4.7.70 | 8/38 | GMS Mochan Da Maira | Vice Mr, Abid Shah terminated as not selected on merit. |

TERMS AND CONDITIONS:

- The will be governed by such rules and regulations inforce and as may be prescribed by the Govt time to time for the category of the the Governmaent servant to which they belog.
- The services will be liable to termination of one month's notice from either side, in case of resignation without notice one month's pay will be forefaeted in lieu thereof.
- They should join the post within one month of the issue of this notification/order.
- The inter se-seniority will be determined in accordance with the merit of Departmental Secaction Committee.

Contd:P/2.....

ATTESTED

[Handwritten signature]

5. Charge report should be submitted to all concerned.
6. They shall be on probation for a period of two years and will have to pass Departmental Examination. In case a candidate fails to qualify the Departmental Exam; he will be given one more chance. If he fails again, then his services will be terminated. On arrival/availability of trained teacher the services of untrained teacher occupies the post will be terminated.
7. Their original certificates/Degrees should be checked and verified from the concerned University/BISE/RDE and Islamic Madrasahs concerned before taking over charge.
8. Service books of the teachers must be prepared complete in all respect before heading over charge.
9. The declaration of Assets should be obtained from them immediately and placed in record.
10. They are required to produce Health and age certificates from Medical authorities concerned before taking over charge.
11. Charge report should not be given to the over age candidate. His case for age relaxation be sent to the concerned quarters.
12. Efforts for transfer before the completion of tenure will disqualify him from the service.
13. No TA/DA is allowed.
14. An undertaking shall be obtained from Master and Degree holder PTC/CT etc: that they will service the Department for at least 5 years.
15. Trained qualified candidates having qualification of B./BSC II Div: may be placed in BPS 9-14 with referring the case to this Direct rate, other will get BPS 9 untrained /unqualified teachers appointed above will be placed in BPS 9 fixed.
16. The above appointments are subject to production/verification of original Degree / certificate. the concerned Principal/Headmasters Headmistresses and DEOs, any candidates if fail to produce the requisite documents may not be allowed to take over charge and report submitted to this Directorate.
17. The services have been terminated as above have not be selected/ approved by the Department Selection Committee.
18. In case of person appointed as an untrained teachers, he will have to pass the requisite training examination within a period of 4 years failing which his services will be terminated.

NOTES. Complete information of each category (separately) in consolidated lists on the prescribed proforma (attached) along with charge report be submitted by the lower offices to this Directorate within a week positively.

14301-14330

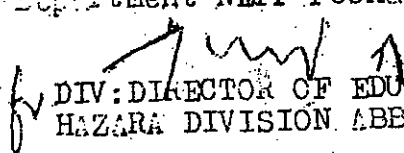
(UMER FAROOQ)
DIV: DIRECTOR OF EDUCATION(S)
HAZARA DIVISION ABBOTTABAD.

Endst: No. _____ / ZEP(M) Trained Apptt:

Dated 25.6.97 / 1997.

Copy forwarded for information to the:-

1. Accountant General NWF Peshawar.
2. Director of Secondary Education NWF Peshawar.
3. District Education Officer (M/S) in Hazara Division.
4. District Accounts Officer in Hazara Division.
5. Principals/Headmasters concerned.
6. P/S to Secretary to Govt. Education, Department NWF Peshawar.
7. Official concerned.
8. M/Fl.


DIV: DIRECTOR OF EDUCATION(S)
HAZARA DIVISION ABBOTTABAD.

ATTEST


OFFICE OF THE DIV: DIRECTOR OF EDUCATION(S) HAZARA DIV: ABBOTTABAD.

ADJUSTMENT/CORREGENDUM.

Mr, Goher Nazir BA/D.F.Ea under appointments at
PET at GMS Ziarat Bala(Haripur) (Surplus) is hereby adjusted
against the vacant D.F.E post at GHSS Battal(Mansehra) on his own
pay and grade with effect from the date of his taking over charge
in t-he interest of public service till the selectee of public service
commission NWFP Peshawar. (with this office appointment No 11/301-11/330
No 66/25/97)

- Note:-
- 1.No TA/DA and TG is allowed.
 - 2.Charge report should be submmited to all concerne-d

(UMAR FAROOQ)
DIV:DIRECTOR OF EDUCATION
(S) HAZARA DIVISION ABBOTTABAD.

Endstaⁿo. 18/52-3 /AE-IV
Copy to:-

Dated. 22/7 /1997.

- 1-2 The Dis-trict Edu-cation Officer(M/S) A.Abad,Haripur and Mansehra.
4. The Principal GHSS Battal Mans-ehra.
5. The ADE Local Directorate.
6. Office File.

[Handwritten Signature]
for/DIV:DIRECTOR OF EDUCATION(S)
HAZARA DIVISION ABBOTTABAD.

ATTACHED
[Handwritten Signature]

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GOVERNMENT OF N.W.F.P.
EDUCATION DEPARTMENT.
NO. S.O.(S)DPE'S/76/M&F/II
DATED PESH: THE 20-7-1987.

To
The Director of Education,
(Schools), NWFP, Peshawar.

SUBJECT:- GRANT OF BS-15 TO PETS HAVING BA/BSK, SENIOR DIPLOMA
IN PHYSICAL EDUCATION QUALIFICATION.

I am directed to refer to your memo: No.2612/A-258/
notification dated, 16-7-1987 on the subject noted above and to
state that the Finance Department U.O. NO: FD(PRC)5-1/84-Vol:VII,
dated, 3-12-1985 contains the same orders which have previously been
circulated to all concerned in NWFP, vide Finance Department
letter No. FD(SR.I)1-67/82, dated, 24-8-1983. The orders of the
Provincial Government as contained in the aforesaid circular of
Finance Department are quite clear and leave no room for further
correspondence and clarification.

2. You are requested to process the cases accordingly.

Sd/-
(SHAHIBZADA FAZAL AMIN)
Section Officer (Schools)

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) N.W.F.P. PESHAWAR.

Endst: No. 7491-7537/A-258/Notification/BPS-83. Dt: Pesh: the 19.10.87.
Copy of the above is forwarded for information &
necessary action to the:-

1. Additional Directress (Schools), N.W.F.P, Peshawar.
2. All the Divl: Director of Education (S), in NWFP, along-
with a copy of the Finance Department, letter No. FD(PRC)
5-1/84-VII, dt: 3-12-1985 with the request that all such
cases may be decided accordingly.
3. All the Distt: Education Officers (M&F), in N.W.F.P.
4. Director, Bureau of Curriculum Development & Education
Extension Centre, Abbottabad.
5. Accountant General, NWFP, Peshawar.
6. All the District Accounts Officers in N.W.F.P.

Atter

Shahibzada

Mwal

Deputy Director (Schools),
for Director of Education(S),
N.W.F.P, Peshawar.

/L-Azim/

(P.T.O.)

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Government of NWFP
Finance Department

Subject:- GRANT OF BASIC PAY SCALE-15 TO THE PETS HAVING BA/BSc
(SDPE) QUALIFICATIONS--

Will Section Officer(Schools.)Govt: of NWFP, Education Department, please refer to his U.O.No.SO(S)DPE's/76/M&F/II, dated 13.11.1985 on the subject noted above.

2. According to Schedule-II of Finance Department's Circular letter No.FD(SR-i)1-67/92 dated 24.8.1983, Physical Training Instructors (High Schools/Comprehensive Schools) possessing qualifications of BA/BSc with Senior Diploma in Physical Education are entitled to BPS-15 with Selection Grade equal to 1/3rd posts in BS-17.

Sd/-----

(IFTIKHAR HUSSAIN)
Officer on Special Duty
(Pay Sell)

Section Officer(Schools)
Education Department.

U.O.NO.FD(PRC)5-1/84-VII dated Pesh:the 3-12-1985.

"Sher"
191/87

Attached
9/17/87

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OFFICE OF THE DIV: DIRECTOR OF EDUCATION(S) HAZARA DIV: A. ABAD.

AWARD OF BPS NO. 15.

The following PET teachers BA/B.P.Ed working in BPS No. 14 are hereby allowed to draw their pay in BPS No. 15 ORs. (2190-177-4845) with effect from the date of their taking over charge against the PET post in High/Higher Secondary school noted against their names as due and admissible to them under the Govt: of NWFP Finance Department Letter No. (SR-I) I-67/63 dated 24.8.83.

| S.No. | Name of teacher/School | Date of Award of BPS No. 15. | Remarks. |
|-------|--|------------------------------|--|
| 1. | Nazar Mohammad PET/BA/B.P.Ed GHS Makool Payeen Abbottabad. | 1.9.1997 | On the passing of BP.Ed and T.O charge ag: PET post in High/Higher Secy: School. |
| 2. | Gehar Nazir PET GHS Tajwal A. Abad BA/B.P.Ed. | 24.7.1997. | ----- |
| 3. | Bilbar Ali Shah PET/BA/B.P.Ed, GHS Shatial Kehistan. | 23.4.98. | ----- |

Note:- Necessary entries to this effect should be made in their service books and other relevant records.

(MOHAMMAD JAMSHED KHAN)
DIV: DIRECTOR OF EDUCATION(S)
HAZARA DIVISION ABBOTTABAD.

Encl: No. 10786-95 / AE-IV/B.P.S. Dated. 13/6 / 1998

- Copy to:-
- 1-2 The District Education Officers(M/S) Abbottabad and Kehistan.
 - 3-4 The District Accounts Officers Abbottabad and Kehistan.
 - 5. The Headmaster GHS Makool Payeen ATD a/w S/Book of S.No.1.
 - 6. The Headmaster GHS Tajwal ATD a/w S/Book of S.No.2.
 - 7. The Headmaster GHS Shatial Kehistan a/w S/Book of S.No.3.
 - 8-10 All the teachers concerned.

Jamshed Khan
for/ DIV: DIRECTOR OF EDUCATION(S)
HAZARA DIVISION ABBOTTABAD.

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[Signature]

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ANNEXURE
D

OFFICE OF THE DISTRICT EDUCATION OFFICER(M) ABBOTTABAD

NOTIFICATION

In pursuance of the Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar issued vide Endst; No:4298-4304/File No: 1/ Promotion / Senior PET B-16 Dated 28.05.2013, whereby the following Six (06) Male PET B-15 were promoted to the post of Senior PET BPS 16 (Rs.10000 - 800-34000) plus usual allowances as admissible under the rules on regular basis under the existing recruitment policy of the Provincial Government on the terms & conditions given below and are hereby adjusted at the stations noted against their names with immediate effect.

| S.No | Sen: List: No. | Name of Teacher | Name of School | Place of Posting | Remarks |
|------|----------------|------------------|---------------------|-----------------------|--|
| 1 | 51 | Gohar Nazir | GHS Bagan | GHS Bagan | Promoted and posted as SPET (B-16) against the same duty station |
| 2 | 65 | Muhammad Saeed | GHS Shekhul Bandi | GHS Shekhul Bandi | Promoted and posted as SPET (B-16) against the same duty station |
| 3 | 66 | Najam Ul Saqib | GMS Seri Khan Kalan | GHS Nakhar Khan Kalan | Promoted and posted vice Asif ur Rehman standing at S.No. 07 |
| 4 | 67 | Sohail Malik | GMS Noormong | GHSS Bagnoter | Promoted and posted vice Mr;M.Younas standing at S.No.08 |
| 5 | 68 | Masood ur Rehman | GHS Satora | GHS Satora | Promoted and posted as SPET (B-16) against the same duty station |
| 6 | 70 | Naveed Khan, | GMS Tarhana | GHS Banda Pir Khan | Promoted and posted vice Mr; Ishtiaq Ahmed standing at S.No.09 |

CONSEQUENTIAL TRANSFER ORDER

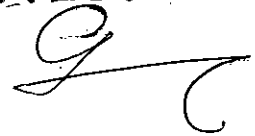
Consequential orders as a result of these promotions from S.No.07 to 09 are noted as under.

| | | | | |
|---|-----------------------------|----------------------|---------------------|---|
| 7 | Asif urRehman PET BPS-15 | GHS Nakar Khan Kalan | GMS Sari Khan Kalan | Vice Njam ul Saqib PET standing at S.No.3 |
| 8 | Muhammad Younis, PET BPS-15 | GHSS Bagnotar | GMS Noor Mang | Vice Sohail Malik PET standing at S.No.4 |
| 9 | Ishtiaq Ahmed PET BPS-15 | GHS Banda Pir Khan | GMS Tarhana | Vice Naveed Khan PET standing at S.No.6 |

Terms & Conditions:

1. On their promotion, the teacher concerned will be on probation for a period of one year in terms of section-6(2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with rule 15(1) of Civil Servant (Appointment, Promotion & Transfer) Rules 1989.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.

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3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules from time to time.
4. Their inter-Se-Seniority on lower post will remain intact.
5. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
6. They should join their post within 15 days of the issuance of this notification. In case of failure to join their posts within 15 days of the issuance of this notification, their promotion will expire automatically and no subsequent appeals will be entertained.
7. Necessary entry shall be recorded in their original service books.
8. Charge report shall be submitted immediately to all concerned.
9. Checking of verification of all the documents shall be ensured by the DDO concerned.
10. No. TA/DA is allowed.

(MUHAMMAD RIAZ SAWATI)
DISTRICT EDUCATION OFFICER
(MALE) ABBOTTABAD

Endst: No. 4067-71 /EB-V/TT(M) Dated A.Abad the 31-5 /2013

Copy forwarded to:

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
2. Director E&SED Khyber Pakhtunkhwa Peshawar.
3. District Comptroller of Accounts, Abbottabad.
4. Deputy District Finance & Planning Officer Abbottabad
5. All the Principals of Middle/High/Higher Secondary Schools concerned
6. Budget & Accounts Officer Local Office.
7. Teachers concerned.
8. M/File.

[Signature]
DY. DISTRICT EDUCATION OFFICER
(MALE) ABBOTTABAD

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[Signature]

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Attention
ACR

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CORRIGENDUM/

Government of NWFP,
Finance Department.

No. FD(PRC)5-1/93.

Dated Pesh: the 9/06/1994.

To

The Secretary to Govt: of
NWFP Education Department.

Subject:-

Corrigendum in the Scheme of Basic Pay Scales
award of B-17 Selection Grade to B.A/B.Sc with
SDPE.

Sir,

P-71/cv

I am directed to refer to your letter No. SO(S)
1-19/90(A), dated 19th October, 1993 on the subject noted above
and to say that for the existing entries at serial No. 6 & 7
appearing under Education Department in Annexure-II to the
Finance Department's letter No. FD(SR-I)1-67/82, dated 24.8.1983
shall be deemed to have been inserted abinitio :-

| <u>Name of post</u> | <u>Existing Scale</u> | <u>Basic Scale</u> |
|--|--|--------------------------|
| Physical Training Instructor(High Schools/Comprehen- sive Schools) B.A with Senior Diploma in Physical Edu. | RNPS-8(Rs.370- 16-514/18-640- 22-750) | B-9 Rs.620- 29-1200) |
| Librarian(High Schools) B.A with Diploma in Library Science. | RNPS-14 Rs.590-30-730/ 35-1010-40-1210 | B-15(Rs.900- 55-2000) |

8/8

Your obedient servant,

(SHAKIR ULLAH)
Section Officer (PRC)

Encl: No. & date even./

Copy forwarded to the Accountant General, NWFP
Peshawar for information and necessary action.

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the 02-01-2018

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19

NOTIFICATION

No. SO(PE)2-6/DPC Meeting/Promotion from SPET-DPE/2017 (22-11-2017): On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Sixty Five (65) Male Senior Physical Education Teacher (SPET) (BS-16) to the post of Director Physical Education (DPE) (BS-17) on regular basis with immediate effect:-

| S.#. | Name and Designation | Present Address | Proposed place of posting | Remarks |
|------|---------------------------|-----------------------------------|---------------------------------|-----------------------------------|
| 1. | SHAFIQR RAHMAN SPET | GHS Totano Bandai Swat | GHSS Deloli Swat | Against Vacant post of DPE BPS-17 |
| 2. | MUHAMMAD RUSTAM KHAN SPET | GHS Khawari Mansehra | GHSS Lissan Thakral Mansehra | Against Vacant post of DPE BPS-17 |
| 3. | MUHAMMAD SULEMAN SPET | GHSS Boi Abbottabad | GHSS Peeran Mansehra | Against Vacant post of DPE BPS-17 |
| 4. | HAZRAT JAMAL SPET | GHSS Dheri Likpani Mardan | GHSS Dheri Likpani Mardan | Against Vacant post of DPE BPS-17 |
| 5. | BAKHT ZAMIN SHAH SPET | GHSS Shewa Dir Lower | GHSS Ouch Dir Lower | Against Vacant post of DPE BPS-17 |
| 6. | SAYED AMIAD ALI SPET | GHSS Biha Swat | GHSS Labat Swat | Against Vacant post of DPE BPS-17 |
| 7. | JEHANZEB KHAN SPET | GHS Kot Gabai Swabi | GHSS Utla Swabi | Against Vacant post of DPE BPS-17 |
| 8. | IRFAN ALI SPET | GHSS Behlola Charsadda | GHSS Rahmatullah Khan Charsadda | Against Vacant post of DPE BPS-17 |
| 9. | MUHAMMAD ALAM JAN SPET | GHSS Nadar FR Bannu | GHSS Darsamand Hangu | Against Vacant post of DPE BPS-17 |
| 10. | SAYED MUKAMMIL SHAH SPET | GHS Sanga Takhtbai Mardan | GHSS Pirabad Takhtbhai Mardan | Against Vacant post of DPE BPS-17 |
| 11. | SHER NABI KHAN SPET | GHS Chumurkone Chitral | GHSS Ayun Chitral | Against Vacant post of DPE BPS-17 |
| 12. | SHAFQATULLAH SPET | GHS Taru Jabba Nowshera | GHSS Jabbi Nowshera | Against Vacant post of DPE BPS-17 |
| 13. | AURANG ZEB SPET | GHS Kanju Swat | GHSS Bamakhela Swat | Against Vacant post of DPE BPS-17 |
| 14. | MUHAMMAD IQBAL SPET | GHSS Kukarai Swat | GHSS Chitor Swat | Against Vacant post of DPE BPS-17 |
| 15. | ZULFIQAR ALI SPET | GHSS Bagnotar Abbottabad | GHSS Behali Mansehra | Against Vacant post of DPE BPS-17 |
| 16. | MUHAMMAD NAWAZ SHAH SPET | GHS Kari Chitral | GHSS Morilasht Chitral | Against Vacant post of DPE BPS-17 |
| 17. | MUHAMMAD GHANI SPET | GHSS Sarseni Swat | GHSS Tall Swat | Against Vacant post of DPE BPS-17 |
| 18. | JAUHER ALI SPET | GHS Miana Doag Dir Upper | GHSS Sheringal Dir Upper | Against Vacant post of DPE BPS-17 |
| 19. | MUHAMMAD NAEEM SPET | GHS Bajna Mansehra | GHSS Jabori Mansehra | Against Vacant post of DPE BPS-17 |
| 20. | GUL BADSHAH SPET | GHS Jatgram Dir Upper | GHSS Akhgram Dir Upper | Against Vacant post of DPE BPS-17 |
| 21. | MIR ASLAM KHAN SPET | GHS Mela Shahab Khel Lakki Marwat | GHSS Khairabad Nowshera | Against Vacant post of DPE BPS-17 |
| 22. | RIASAT MEHMOOD SPET | GHSS Panian Haripur | GHSS Kahal Haripur | Against Vacant post of DPE BPS-17 |
| 23. | SULIMAN SPET | GHSS Mingora No. 2 Swat | GHSS Dherai Swat | Against Vacant post of DPE BPS-17 |
| 24. | MUHAMMAD NAWAZ SPET | GCMHS No. 1 DI Khan | GHSS Kirri Shamoza D.I Khan | Against Vacant post of DPE BPS-17 |
| 25. | RAB NAWAZ KHAN SPET | GHS Haramatala Lakki Marwat | GHSS Mian Khan Mardan | Against Vacant post of DPE BPS-17 |

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|-----|----------------------------|---------------------------------------|---------------------------------|--|
| | WAHEED U ZAMAN SPET | GHS Gandyali Payan Kohat | GHSS Ibrahimzai Hangu | Against Vacant post of DPE BPS-17 |
| 27. | MUHAMMAD WALI SPET | GHS Bilawar Khan Bannu | GHSS Nandraka Kohat | Against Vacant post of DPE BPS-17 |
| 28. | IQBAL ZAMAN SPET | GHSS Pinda Khel Bannu | GHSS Muhammad Khwaja Hangu | Against Vacant post of DPE BPS-17 |
| 29. | BADSHAH SAUD SPET | GHS Heroshah Malakand | GHSS Kot Malakand | Against Vacant post of DPE BPS-17 |
| 30. | GUL ZARIF KHAN SPET | GHH Matora Lakki Marwat | GHSS Katti Garhi Mardan | Against Vacant post of DPE BPS-17 |
| 31. | MUHAMMAD ARSHAD SPET | GHS Sikandar Janubi Di Khan | GHSS Ghala Dher Mardan | Against Vacant post of DPE BPS-17 |
| 32. | BALQIAS KHAN SPET | GHS Surdag Karak | GHSS Karbogha Sharif Hangu | Against Vacant post of DPE BPS-17 |
| 33. | MUHAMMAD NAQIB SPET | GHSS Landi Kachi Kohat | GHSS Khadezai Kohat | Against Vacant post of DPE BPS-17 |
| 34. | ALAM ZEB SPET | GHS Chamkani Peshawar | GHSS Garhi Ghulam Shah Peshawar | Against Vacant post of DPE BPS-17 |
| 35. | MUHAMMAD SAJID SALEEM SPET | GHSS Dhenda Haripur | GHSS Jatipend Haripur | Against Vacant post of DPE BPS-17 |
| 36. | ADEEL ASHTAR SPET | GHSS Bherkund Mansehra | GHSS Gali Badral Mansehra | Against Vacant post of DPE BPS-17 |
| 37. | ABDUS SAMAD SPET | GHS Kot Attal Sharif Di Khan | GHSS Gaddar Mardan | Against Vacant post of DPE BPS-17 |
| 38. | SHAFIQ UR REHMAN SPET | GHS Jang Khel Lakki Marwat | GHSS Badar Banda Mardan | Against Vacant post of DPE BPS-17 |
| 39. | SAEED AHMAD SPET | GHSS Nagri Bala Abbottabad | GHSS Nagri Bala Abbottabad | Against Vacant post of DPE BPS-17 |
| 40. | SHAHZADA KHAN SPET | GHSS Baghra Haripur | GHSS Bareela Haripur | Against Vacant post of DPE BPS-17 |
| 41. | AKHTAR ZAIB SPET | GHS Jozê Battagram | GHSS Thakot Battagram | Against Vacant post of DPE BPS-17 |
| 42. | MIAN WAHIB SHAH SPET | GHS Ganshal Buner | GHSS Aboha Swat | Against Vacant post of DPE BPS-17 |
| 43. | KHURSHID IQBAL SPET | GHS Subhan Khwar Momand Agency | GHSS Chaghar Matti Peshawar | Against Vacant post of DPE BPS-17 |
| 44. | LIAQAT ALI SPET | GHS Naway Kalay Momand Agency | GHSS Sharqi Hoti Mardan | Against Vacant post of DPE BPS-17 |
| 45. | JAHANGIR KHAN SPET | GMS Trikh Talai SWA | GHSS Ziarat Masoom Abbottabad | Against Vacant post of DPE BPS-17 |
| 46. | IFTIKHAR ALI SPET | GHS Jalbai Swabi | GHSS Tarakai Swabi | Against Vacant post of DPE BPS-17 |
| 47. | FARIDOOD SPET | GHSS Zalam Kot Malakand | GHSS Khairabad Dir Lower | Against Vacant post of DPE BPS-17 |
| 48. | MUHAMMAD NASIM SPET | GHS Kiri Raiki Abbottabad | GHSS Tajwal Abbottabad | Against Vacant post of DPE BPS-17 |
| 49. | AMAL KHAN SPET | GHS Dara Adam Khel FR Kohat | GHSS Urmar Bala Peshawar | Against Vacant post of DPE BPS-17 |
| 50. | MUHAMMAD ILYAS SPET | GHS Muhammad Khal Kalay Khyber Agency | GHSS Chanai Swabi | Against Vacant post of DPE BPS-17 |
| 51. | SAJID MEHMOOD SPET | GHSS No. 1 Mansehra | GHSS Trappi Mansehra | Against Vacant post of DPE BPS-17 |
| 52. | QAZI MUHAMMAD ISHAQ | GCMHS Battagram | GHSS Paimal Sharif Battagram | Against Vacant post of DPE BPS-17 |
| 53. | MUHAMMAD HANIF SPET | GHSS Jalgali Mansehra | GHSS Jalgali Mansehra | Against Vacant post of DPE BPS-17 |
| 54. | SULTAN MEHMOOD SPET | GHS Manzini Karak | GHSS Togh Sarai Hangu | Against Vacant post of DPE BPS-17 |
| 55. | SHAMROZ KHAN SPET | GHS No. 2 Haripur | GHSS Sarai Naimat Khan Haripur | Against Vacant post of DPE BPS-17 |
| 56. | FARID ULLAH SHAH SPET | GHSS Sarai Naurang Lakki Marwat | GHSS Sarai Naurang Lakki Marwat | Against Vacant post of DPE BPS-17 |
| 57. | MUSHARAF KHAN SPET | GHS Mangala Lakki Marwat | GHSS Khanjar Mardan | Against Vacant post of DPE BPS-17 |
| 58. | NIAMAT ULLAH KHAN SPET | GHS No. 2 Lakki City | GHSS Wanda Amir Lakki Marwat | Against the newly created post of DPE BPS-17 |

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|-----|---------------------|---------------------------|-----------------------------|---|
| 59. | ALLAH NAWAZ SPET | GHS Haleemzai Charsadda | GHSS Gul Bela Peshawar | Against Vacant post of DPE BPS-17 |
| 60. | GHULAM SARWAR SPET | GHSS Shodag Charsadda | GHSS Qasim Toru Mardan | Against Vacant post of DPE BPS-17 |
| 61. | HAMID ALI KHAN SPET | GHS Miani Swabi | GHSS Salim Khan Swabi | Against Vacant post of DPE BPS-17 |
| 62. | JAVED KHAN SPET | GHS Seri Haripur. | GHSS Beer Haripur. | Against Vacant post of DPE BPS-17 |
| 63. | ISMAL SPET | GHSS Nudeh Payan Peshawar | GHSS Garhi Sherdad Peshawar | He will actualize his promotion against the vacant post of DPE BPS-17 in GHSS Garhi Sherdad, Peshawar and report back to GHSS Nudeh Payan Peshawar as DPE (BS-17) against the post of DPE (BS-18) in his own pay & scale. |
| 64. | JAN ZADA SPET | GHS Khas Koroona Mardan | GHSS Naseer Killi Mardan | Against Vacant post of DPE BPS-17 |
| 65. | MURAD SHAH SPET | GHS Sakhakot Malakand. | GHSS Ikrampur, Mardan | Against Vacant post of DPE BPS-17 |

2. On their promotion, the Director Physical Education (DPE) concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No. TA /DA allowed.

SECRETARY

Endst. No. & date as above.

Copy to:

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
3. The Accountant General Khyber Pakhtunkhwa, Peshawar.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
6. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification on E&SE Department website (www.kpese.gov.pk).
7. The District Education Officers, Elementary & Secondary Education concerned.
8. The District Accounts Officers concerned.
9. PS to Secretary E&SE Department.
10. Director Physical Education (DPE) concerned.
11. Office File.


SECTION OFFICER PRIMARY

ATTESTED



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To,

The Secretary E&S Education Department,
Khyber Pakhtunkhwa, Peshawar.

ANNEXURE
9

Subject: APPEAL UNDER RIGHT TO APPEAL RULES, 1986 (3)

Respected Sir,

It is very humbly submitted as under:-

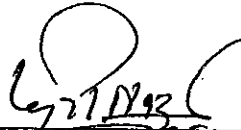
1. That appellant was appointed as a PST, on 27/10/1981 in Elementary & Secondary Department, Abbottabad.
2. That, on 23/07/1997, appellant was appointed through proper channel as a "Physical Education Teacher" (P.E.T) in BPS-14, on the basis of prescribed qualification.
3. That, on 13/06/1998, appellant was promoted from BPS-14 to BPS-15 in the light of notification dated 24/08/1983, issued by Govt of NWFP (now KPK), Finance Department Peshawar.
4. That, in the said notification, it was clearly mentioned that the selection Grade of the said promoted employees, shall be BPS-17, but till now the appellant has not been granted Selection Grade-BPS-17, which is violation of Article-25 of the Constitution of Islamic Republic of Pakistan.
5. That, on 11/07/2012, Govt of KPK, Elementary & Secondary Education Department Peshawar issued a promotion notification under 1/3 formula.
6. That, under 1/3 promotion formula, PET teacher has been promoted from PET To SPET, (BPS-15 to BPS-16), vide order dated 26/02/2013, issued by DEO (Male) Abbottabad by the approval of Director E&SE, KPK, Peshawar, thus, many PET teacher, were promoted in BPS-16, who were most junior from the appellant.
7. That, on 28/05/2013, appellant was promoted from BPS-15 to BPS-16 (PET to SPET), vide the said notification dated 11/07/2012 with immediate effect.

It is therefore, humbly prayed that on acceptance of instant Appeal, the Appellant may kindly be granted Selection Grade BPS-17, in the light of notification dated 24/08/1983, with all back benefits. Any other relief for which the appellant deserves under Rules.

(All relevant documents are attached here with the appeal.)

Dated:

02-4-2019


GOHAR NAZIR (S.P.E.T)
GHS BAGAN, DISTRICT, ABBOTTABAD
.....(APPELLANT)

ATA 6706321
 0301 3032856-0912260182
 0346. 9580488
 GMS (PET)

GOVERNMENT OF NWFP
 FINANCE DEPARTMENT

(Regulation Wing)

NO.FD/SO(FR)/10-22(B)/2007Vol-11
 Dated Peshawar, the 12.11.2008

To

Secretary to Govt. of NWFP,
 Elementary & Secondary Education Department,
 Peshawar.

Subject: - UPGRADATION OF THE VARIOUS POSTS OF THE TEACHERS / CAREERS STRUCTURE IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT, GOVERNMENT OF NWFP.

Dear Sir,

I am directed to refer to your letter No. SO(B&A)/1-18/2008/Upgradation dated 03-11-2008 on the subject noted above and to state that competent authority has approved the upgradation of the following posts in Elementary & Secondary Education Department with effect from 01-10-2007.

| S.NO | Existing Designation and Pay Scale | Qualification | Upgraded Scale |
|------|------------------------------------|--|------------------------|
| 1 | DM (BPS-09) | BA/BSc/ equivalent qualification with Drawing Master Course. | BPS-15 (one time only) |
| 2 | PET (BPS-09) | BA/BSc/ equivalent qualification with DPE. | BPS-15 (one time only) |

Audit may be prepared and sent to this department for authentication.

Yours faithfully,

5/12

(MOHAMMAD ALAM)
 SECTION OFFICER (FR)

5610
 4.10

کورٹ فیس

وکالت نامہ

بعدالت سروس ٹراٹمنٹ کیس پورٹ اسٹاپ

عنوان: گوہر نزیہ بنام گورنمنٹ کپن وی ۵

منجانب: گوہر نزیہ

نوعیت مقدمہ: سول اپیل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام ایسٹ آباد کے لیے گوہر نزیہ و جہان اربوہ کوٹھال پورٹ اسٹاپ کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔ Accepted

المرقوم: 19/01/2022

بمقام: ایسٹ آباد

العبد العبد

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

18

Appeal No. 999 of 20 19

Gohar Nazim Appellant/Petitioner

Versus

Through Secy. Educ. Dept. Pesh. Respondent

Respondent No. 3

Notice to: — Distt. Education officer, Ede-2 Sec. Education
(Male) Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....20-4-2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....25/4.....

Day of.....Jan.....20 22

at Camp Const A. Ahead

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

7B

Appeal No. 999 of 2019

Gabbar Nazki Appellant/Petitioner

Versus

Through Secy. Educ. & Sci. Edu. Peshawar Respondent

1412

Respondent No. I

Notice to: —

Genl. of U.S.P. Through Secy. Educ. & Sci. Edu. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 20.12.22 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 25/12/22 Day of Jan 2022

at Comp Court A Road

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

7B

Appeal No.....999..... of 20 19

.....Appellant/Petitioner
Geetav Nazir
Versus

.....Respondent
through Secy. Edu. Dept. Peshawar
Respondent No.....2.....

Notice to: — *Director, Edu. & Sec. Education Dept. of KPDC Peshawar.*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....*20-11-2022*.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....*25.11*.....
Day of.....*Jan*.....20 *22*

at Camp Court Road
[Signature]

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.