

14th Nov, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Sohail Ahmad Zeb, Superintendent for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not made preparation for arguments. To come up for arguments on 12.12.2022 before the D.B at Camp Court Abbottabad.




(Salah Ud Din)
Member (Judicial)
Camp Court Abbottabad



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad


21th July 2022 Counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Sohail Ahmad Zeb, Litigation Officer for the respondents present.


Written reply/comments on behalf of the respondents submitted which is placed on file. A copy of the same is also handed over to the learned counsel for the appellant. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

22nd Sept 2022 Counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

At the very outset learned counsel for the appellant produce copy of a judgment passed in appeal No. 2231/2019 titled "Muhammad Iqbal-vs-Govt: of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education (E&SE) Khyber Pakhtunkhwa Peshawar and three others" who was one of the representationist and his name was found at serial No.8 of the alleged impugned order. The judgment was handed down by Rozina Rehman, Learned Member(Judicial), therefore, it is appropriate that this case be also heard by the said learned Member. To come up for arguments on 14.11.2022 before D.B at camp court Abbottabad.


(Fareeha Paul)
Member (Executive)


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

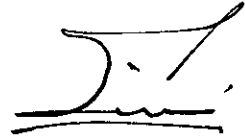
22.09.2021

Mr. Muhammad Liaqat, Advocate, for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence, the appeal is admitted to regular hearing subject to all legal and valid objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance.

File to come up for arguments before the D.B on 21.12.2021 at Camp Court Abbottabad.

Appellant Deposited
Security Process Fee

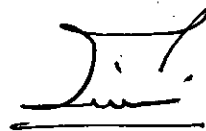


(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

21.12.2021

Clerk of learned counsel for the appellant present.
Mr. Asif Masood, DDA for respondents present.

Notices to the respondents have not been issued, therefore, notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments before S.B on 17.02.2022 at camp court Abbottabad.



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

Annexure "A"

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT, ABBOTTABAD**

Service Appeal No. 2231/2019



Date of Institution ... 26.12.2019
Date of Decision .. 17.03.2021

Muhammad Iqbal son of Abdul Kareem Khan, presently S.P.S.T
G.P.S No.4 Tehsil & District Abbottabad.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa
Peshawar and three others.

(Respondents)

Muhammad Liaqat,
Advocate

... For appellant.

Riaz Khan Paindakheil,
Assistant Advocate General

... For respondents.

ROZINA REHMAN
ATIQU UR REHMAN WAZIR

... MEMBER (J)
... MEMBER (E)


JUDGMENT

ROZINA REHMAN, MEMBER : This judgment is intended to dispose of

05 connected service appeals which are:

1. Service Appeal No.2231/2019

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar


- 2. Service Appeal No. 2234/2019
- 3. Service Appeal No. 2235/2019
- 4. Service Appeal No. 2236/2019
- 5. Service Appeal No. 2237/2019

In view of common questions of law and facts, the above captioned appeals are being disposed of by this order.

2. The relevant facts leading to filing of instant appeals are that appellants were appointed as P.T.C/P.S.T having prescribed qualification. There were duly qualified and eligible for promotion however, promotion was denied only on the strength of amendments brought about through notification dated 30.01.2018 wherein the requisite educational qualification was enhanced from Intermediate to B.A. Some of the appellants also filed Writ Petition before the august Peshawar High Court Abbottabad Bench which was treated as departmental representation and was sent to the respondents for decision which was rejected, hence, the present service appeal.

3. We have heard Muhammad Liaqat Advocate for appellant and Riaz Khan Paindakheil learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Muhammad Liaqat Advccate counsel appearing on behalf of appellants, inter-alia, contended that the order dated 18.12.2019 is against law and facts which is void ab-initio and without legal authority. He argued that the impugned order is against the policy as a meeting

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

2

~~5~~

was held on 08.05.2018 wherein issue of promotion was discussed at Serial No.10 and all the D.E.Os were directed that the promotion cases of the P.S.Ts to S.P.S.Ts/P.S.H.T must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment. Learned counsel further submitted that the notification dated 30.11.2018 is not applicable in the case of appellants as at the time of their appointment, no such terms & conditions were incorporated in the appointment order of the appellants, hence, notification mentioned above has no legal value in the case of appellants and they are eligible for promotion in view of notification dated 13.11.2012.

5. As against that learned A.A.G submitted that as per notification dated 30.11.2018, the requisite qualification for promotion is Bachelor Degree, whereas, appellants do not fulfill the requisite qualification.

6. From the record, it is evident that the respondents had issued a notification dated 13.11.2012, wherein, method of recruitment/promotion has been laid down for Primary School Teachers (P.S.T BPS-12) Senior Primary School Teachers (S.P.S.T BPS-14) and Primary School Head Teachers (P.S.H.T B.P.S-15). Criteria for promotion from P.S.T to S.P.S.T is on the basis of seniority-cum-fitness with at least five years service with Intermediate or equivalent qualification. Similarly, promotion from S.P.S.T to P.S.H.T is based on seniority-cum-fitness with at least ten years service with Intermediate or equivalent. Appellants were appointed as P.S.T who were holding


ATTESTED

J. A. MINEER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

* 32

almost 20-25 years of service with Intermediate qualification obtained during the year 2014-16. Record reveals that the appellants approached the Hon'ble Peshawar High Court in Writ Petition for their promotion on the strength of Promotion Policy 2012 and the High Court converted their petition into departmental appeals with directions to the respondents to consider their grievances and decide the same in accordance with law. The respondents accordingly processed their request but in the meanwhile, certain amendments were made in the promotion policy re-emerging as Promotion Policy 2018, wherein qualification for promotion was enhanced from Intermediate to Bachelor Degree, therefore, their requests were turned down as by now they were not eligible for promotion according to new policy. The appellants were qualified for promotion under the Policy of the year 2012 after obtaining the required qualification in 2014-16 but they were not promoted and their due right of promotion was violated. It is also evident from the Minutes of Meeting dated 16.05.2018 whereby respondent No.2 was conscious of the fact that promotions need to be done as per criteria laid down in 2012 Policy but somehow, the District Education Officer did not comply with such directions which resulted into miscarriage of justice.

7. In view of above, the instant appeals are accepted with direction to the respondents to consider the cases of promotion of the appellants as per guidelines contained in the Promotion Policy of 2012.

ATTESTED

ATTORNEY GENERAL
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

* 3/

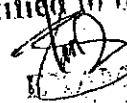
Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.
17.03.2021

(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad

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

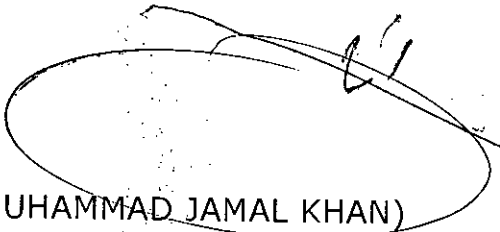
Certified to be true copy


MEMBER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 10-06-2021
Number of Words 2000
Copying Fee 22.00
Urgent 4.00
Total 26.00
Name of Copyist _____
Date of Completion of Copy 10-06-2021
Date of Delivery of Copy 10-06-2021

18.09.2020

Mr. Muhammad Liaqat, Advocate for appellant is present. According to the learned counsel in similar appeals the same order has been impugned which have already been admitted and proceedings have been conducted in pursuance thereof in which replies have been submitted and at the moment the case is fixed for arguments before D.B, therefore, it would be appropriate to fix the instant two appeals having identical nature on that very day. The request is proper and is accepted propriety demand that appeals of similar nature are to be tackled and decided simultaneously for avoiding any conflict in judgment therefore, the appeals are adjourned to 19.10.2020 on which to come up for preliminary hearing before S.B at Camp Court Abbottabad.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

19.10.2020

Nemo for appellant.

Lawyers are on general strike, therefore, the case is adjourned to 20.01.2021 for preliminary hearing, before S.B at Camp Court, Abbottabad. Notice be issued to appellant and his counsel for the date fixed.



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

20-1-21

Due to covid 19, the case is adjourned
to 22-9-2021 For the same.




Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2232/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/12/2019	<p>The appeal of Mr. Imtiaz Khan presented today by Mr. Muhammad Liaqat 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;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-02-20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to covid ,19 case to come up for the same on / / at camp court abbottabad.</p> <p style="text-align: right;">Reader</p> <p>Due to summer vacation case to come up for the same on <u>18/9/20</u> at camp court abbottabad.</p> <p style="text-align: right;"> Reader</p>

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. 2232/2019

Imtiaz Khan son of Khan Bahadur, presently PST GPS Ghar Pair Tehsil and District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & Others

.....RESPONDENTS

SERVICE APPEAL

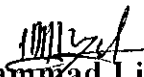
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1	Service appeal alongwith Affidavit	01 to 06	
2	Application for Suspension of Operation	7 to 8	
3	Copy of appointment order and pay slip	9 to 10	"A" & "B"
4	Copy of HSSC certificate	11 to 12	"C"
5	Copy of writ petition and order	13 to 16	"D" & "E"
6	Copy of the Policy dated 13/11/2012 and impugned order dated 18-12-2019	17 to 32	"F" & "G"
7	Attested copy of the Judgment dated 07-11-2018	33 to 37	"H"
8	Copy of minutes of the meeting dated 08-05-2018	38 to 41	"I"
10	Wakalatnama	42	

Dated: 25/12/2019

....APPELLANT

Through


(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

/

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. 2232/2019

Imtiaz Khan son of Khan Bahadur, presently PST GPS Ghar Pair Tehsil and District Abbottabad.

.....**APPELLANT**
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 2331
Dated 26/12/19

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (M) Abbottabad.
4. Sub Divisional Education Officer (M) Lower Tanawal Abbottabad.

.....**RESPONDENTS**

APPEAL UNDER SECTION 4 OF NWFP (NOW KPK) SERVICE TRIBUNAL, ACT, 1974 AGAINST THE OFFICE ORDER NO.13052/ADEO(Lit) DATED 18-12-2019 ISSUED BY RESPONDANT NO.3 VIDE WHICH DEPARTMENTAL REPRESENTATION OF THE APPELLANT WAS DISMISSED WHICH IS TOTALLY AGAINST THE LAW, POLICY, WITHOUT JURISDICTION, ARBITRARILY, VOID ABINITIO, AND HAVING NO LEGAL EFFECT UPON THE VESTED RIGHTS OF THE APPELLANT.

Filed to
Registrar
26/12/19

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED ORDER ENDST: NO. 13052/ADEO(Lit) DATED 18-12-2019 ISSUED BY RESPONDANT NO.3 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY

GRACIOUSLY BE DIRECTED TO PROMOTE THE APPELLANT FROM PST BPS-12 TO SPST BPS-14 AND PSHT BPS-15 WITH ALL BACK BENEFITS AS PER NOTIFICATION NO. SO(PE)SSRC/MEETING/2012/TEACHING CADRE DATED 13-11-2012. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS PROPER IN THE CIRCUMSTANCES OF THE CASE BE GRANTED.

Respectfully Sheweth:-

1. That the appellant was appointed as PTC/PST on 27-09-1986 having prescribed qualification and presently working as SPST BPS-14 at GPS Thati Ahmed Khan Abbottabad. (Copy of appointment order and pay slip are annexed herewith as Annexure "A" & "B" respectively).
2. That the appellant passed HSSC in the year of 2014. (Copy of HSSC certificate is annexed as Annexure "C").
3. That appellant being aggrieved filed writ petition before the August High Court, Abbottabad Bench in which High Court Abbottabad Bench treated the writ petition as departmental representation and same was sent to respondent for decision. Copy of writ petition and order is attached as Annexure "D" & "E".
4. That the request/ departmental representation of the appellant was rejected by the respondent No. 3 vide Endst:

No. 13052 dated 18-12-2019 with the remarks that as per Notification dated 30-01-2018 appellant do not fulfill the requisite eligibility criteria for promotion. (Copy of the Policy dated 13/11/2012 and impugned order dated 18-12-2019 is annexed herewith as annexure "F" & "G").

Now appellant seeks indulgence of this Honourable Tribunal for setting aside the impugned order dated 18-12-2019 inter-alia on the following amongst many others:-

GROUND:-

- a) That the impugned order dated 18-12-2019 against the law, facts and circumstances.
- b) That the impugned order is illegal passed in highly capricious manner which is void abinitio and without legal authority.
- c) That the respondents had illegally not consider the appellant for promotion and deprived the appellant for his legal right.
- d) That the identical issue was decided by the Honourable Peshawar High Court Abbottabad Bench in WP No. 207-A/2018 dated 07-11-2018 wherein, Honourable Court held that *"there is no mention in Notification dated 30-01-2018 that the same would have retrospective effect."* (Attested

copy of the Judgment dated 07-11-2018 is annexed here with as Annexure "H").

e) That the impugned order dated 18-12-2019 is against the Policy as a meeting was held on 08-05-2018 at committee room of E&SE KP under the chairmanship of respondent No. 2 wherein, issue of promotion was discussed at Serial No. 10 and respondent No. 2 directed all the DEOs including respondent No. 3 **"that the promotion cases of PSTs to SPSTs/PSHTs must be entertained according to the previous Policy of promotion while new Rules are to be applied for new induction/recruitment."** (Copy of minutes of the meeting dated 08-05-2018 is annexed herewith as Annexure "I").

f) That the Notification dated 30-01-2018 is not applicable in the case of appellant as at the time of appointment no such terms and conditions was incorporated in the appointment order of the appellant. Hence, Notification dated 30-01-2018 has no legal value in the case of appellant as appellant is eligible for promotion in view of Notification No. SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012.

g) That the Notification dated 30-01-2018 is silent whether the same would have retrospective or prospective effect. Hence, impugned order dated 18-18-12-2019 is liable to be set aside on this score alone.


- h) That the valuable rights of the appellant are involved.
- i) That the appellant seeks leave of this Honourable Tribunal to raise additional grounds during the course of arguments with the permission of Honourable Tribunal.
- j) That the instant service appeal is well within time.

It is, therefore, very humbly prayed that on acceptance of instant appeal impugned order issued vide Endst: No. 13052/ADEO(Lit) dated 18-12-2019 issued by respondent No.3 may graciously be set-aside and respondents may graciously be directed to promote the appellant from PST BPS-12 to SPST BPS-14 and PSHT BPS-15 alongwith all back benefits as per Notification No. SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012. Any other relief which this Honourable Tribunal deems proper in the circumstances of the case be granted.

Dated: 25/12/2019


....APPELLANT

Through


(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.


....APPELLANT

6/

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. ____/2019

Imtiaz Khan son of Khan Bahadur, presently PST GPS Ghar Bair Tehsil and District Abbottabad.

.....APPELLANT

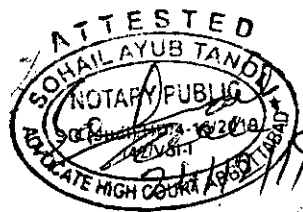
VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & Others

.....RESPONDENTS

AFFIDAVIT

I, Imtiaz Khan son of Khan Bahadur, presently PST GPS Ghar Bair Tehsil and District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.




DEPONENT

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. ____/2019

Imtiaz Khan son of Khan Bahadur, presently PST GPS Ghar Bair Tehsil and District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa & Others

.....RESPONDENTS

APPLICATION FOR SUSPENSION OF OPERATION OF
THE ORDER NO. 10629-31 DATED 26-9-19 TILL THE
DECISION OF THE ABOVE TITLED SERVICE
APPEAL.

Respectfully Sheweth:-

That the petitioner/appellant submits as under:-

1. That the above referred service Appeal is going to be filed in this Honourable Tribunal and instant application may please be considered as integral part of the appeal in hand.
2. That the service appeal of the petitioner /appellant is prima facie in nature as the impugned order dated 18/12/2018 was issued without lawful authority and clear cut violation of direction of respondent No. 2.
3. That the balance of connivance is also in the favour of appellant.

8/

4. That in case of non suspension of operation of order dated --
~~26-9-19~~ the appeal of the appellant would become infructuous and
appellant would be suffered irreparable loss.


5. That all the basic ingredients regarding suspension of the
operation of order dated ~~26-9-19~~ temporary injunction is
fulfilled under the law.

It is, therefore, respectfully prayed that on acceptance of
instant application operation of the order dated ~~26-9-19~~ may
kindly be suspended till the decision of titled Service
Appeal.

Dated: 25/12/2019

9-
...APPELLANT

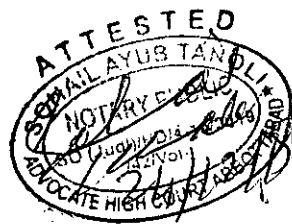
Through


(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

AFFADAVIT

I, Imtiaz Khan son of Khan Bahadur, presently PST GPS Ghar Bair
Tehsil and District Abbottabad, declare on oath that the contents of forgoing
application are correct and true according to the best of my knowledge and
belief and nothing has been suppressed from this Honorable Tribunal.

9-
DEPONENT



APPOINTMENTS/ADJUSTMENTS

OFFICE ORDER NO. 27361 / APPOINTMENT of PTCs/JVs Dated Al. Abad, the 29.8.1984

Annex A
9

First Appointment order

As approved by the District Education Officer (M) Abbottabad Chairman District Council Abbottabad on 29.8.1984. Appointments/adjustments of the following PTCs cand dates newly sanctioned posts in Primary/vacant posts in different Schools are hereby ordered in the interest of public service with immediate effect:-- Vide No quoted above

SNO.	Name of Candidate with Address.	From	To	Remarks.
1.	Gohar Rehman S/O Sherzaman R/O Tori Sharif.		GMS.P/Khurd	Vice No. 123
2.	Chanzeb S/O Shah Zaman R/O Bandi Maira		Mosque Tikar	Vice No. 35
3.	Ali Asghar S/O Sumandar Khan R/O Sarhan.		GPS. Boghran,	Vice Mohd Ayub Transferred.
4.	Aliur Rehman S/O Nurur Rehman R/O Tandhara.		GPS. Nagaki	N/created post.
5.	Jehan Zeb S/O Khushal R/O Johana		GPS. Bagnotur	do do
6.	Imtiaz S/O Khan Bhadar R/O Kharper		GPS. Phalla	Vice Abdullah proceeded on LPR.
7.	Mohd Saddique S/O Khanizaman R/O Bandi Mansoor.		GPS. Narrian	N/created post.
8.	Mohd Munir S/O Gul Hassan R/O Maira Sydan.		GPS. Kangarmaira	do
9.	Mohd Eashir S/O Ali Dad R/O Mundra		GPS. Kuthiala	Vice No. 145
10.	Mohd. Irshad S/O Sw Walistan R/O Ghorabazgran.		GPS. Majath	N/created post.
11.	S. Abdul Hamid Shah S/O Abdur Rahim Shah R/O Darera		GPS. Mujarra	do do
12.	Abdul Qadir S/O Khaliq Dad R/O Kashka Havelian.		GPS. B/Sahib Khan	Vacant post.
13.	Mohd Riaz S/O Said Alam R/O Kuthwai.		GPS. Jandar Bari	N/created post.
14.	Karim Dad S/O Gulhab R/O Kulanda		GPS. Thasi	do do
15.	Abdul Khaliq S/O R/O Serien		GPS. Bagn(Bagnotur)	do do
16.	Mohd Anwar S/O Mohd Najer R/O Angar Bala.		GPS. Kuthiala	Vice SNO. 146
17.	Ijaz Hussain Shah B/O Boi		GPS. Tarkote	Vice No. 136
18.	Khalid Hussain Shah R/O Tori		GPS. Tarkote	Vice No. 147
19.	Ansar Khan S/O Karam Elahi R/O Shariphulgran.		GPS. Guldhook	Vice No. 37
20.	Azizulhaq S/O Azizur Rehman R/O Jobathar		GPS. Thana Khurd	N/created post.
21.	Khurshid Alam S/O Ahmed Din R/O Nawansher		GPS. Maira Mandroch	Vice No. 122
22.	Gohar Rehman S/O Khanizaman R/O Boi		GPS. Julhal	Vice No. 148 (143)
23.	Shaukat Ali S/O Abbas Ali R/O Shaheedbad		GPS. Phalla	Vice No. 103
24.	S. Irshad Hussain Shah S/O Ibrar Hussain Shah R/O Khuyan.		GPS. Seri (Lora)	Vice No. 99
25.	Barsharat Khan S/O Sarfaraz Khan R/O Thathi Faqir Sahib		GPS. Leeran	N/created post.
26.	Shaukat Hussain S/O Mohd Fareed R/O Jarra.		CPS. Gul Bondi	Vice No. 93
27.	Khurshid Nazi S/O Mohd Din R/O Nawansher		GPS. Dakhan Sydan	Vice No. 77
28.	Manzoor Ahmed S/O Miskeen R/O Banti Atti Khan		GPS. Langra	Vice No. 58

(CONTG. ON PAGE NO. 2)

151, Mohd Akram PT GPS. Gojri GPS. Qalandarabad Vice No. 152
152, Mohd Fareed JV GPS. Qalandarabad GPS. Gojri Vice No. 151

CONDITIONS.


1. Charge reports should be submitted to all concerned.
2. NO TA/DA & Transfer grant is allowed to any one.
3. New candidates are required to produce age and health certificate from medical authorities before taking over charge.
4. Fresh candidates who failed to take over charge within 15 days, their appointments will automatically stand as cancelled.
5. The appointments are purely on temporary basis and subject to termination at any time without notice and assigning any reasons.
6. The appointment is made under all services conditions laid down by the Government.
7. The Fresh candidate will get HPS No. 7 plus usual allowance.
8. In case of age exceeding 25 years or below 18 years, the candidates may not be handed over charge.

Sd/xxxxxxxxx
Chairman,
District Council, Abbottabad.

Sd/xxxxxxxxxxxxx
District Education Officer (M)
Abbottabad District Abbottabad.

Indst No. 8632-8831 / Dated Abbottabad, the 29/3 / 1984

- 1. The District Council, Abbottabad.
- 2. All ASDEOs, Local Office, Abbottabad.
- 3. Local Account Branch.
- 4. All Candidates concerned.
- 5. All Headmasters/Headteacher, Concerned Schools.
- 6. Office order file.


(MOHAMMAD YUSUF)
SUB-DIVISIONAL EDUCATION OFFICER (M)
ABBOTTABAD SUB-DIVISION ABBOTTABAD

15.1.84
15.1.85

Dist. Govt. NWFP-Provincial
District Accounts Office Abbotabad
Monthly Salary Statement (August-2018)



Anna B 10

Personal Information of Mr IMTIAZ d/w/s of KHAN BAHADAR

Personnel Number: 00009693 CNIC: 1310108439423 NTN: 0
 Date of Birth: 15.01.1965 Entry into Govt. Service: 01.09.1984 Length of Service: 34 Years 00 Months 001 Days

Employment Category: Vocational Permanent

Designation: PRIMARY SCHOOL TEACHER 80000364-DISTRICT GOVERNMENT KHYBE
 DDO Code: AD6127-DY DISTT OFFICER (M) PRY ATD
 Payroll Section: 003 GPF Section: 001 Cash Center: 07
 GPF A/C No: EDU 008635 Interest Applied: Yes **GPF Balance:** 552,192.00
 Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 13 Pay Stage: 26

Wage type		Amount	Wage type		Amount
0001	Basic Pay	41,560.00	1000	House Rent Allowance	2,091.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1968	Incentive Allowance 20%	1,000.00	2148	15% Adhoc Relief All-2013	975.00
2199	Adhoc Relief Allow @10%	671.00	2211	Adhoc Relief All 2016 10%	3,393.00
2224	Adhoc Relief All 2017 10%	4,156.00	2247	Adhoc Relief All 2018 10%	4,156.00

Deductions - General

Wage type		Amount	Wage type		Amount
3013	GPF Subscription - Rs2400	-2,400.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-50.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-1,052.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	440,000.00	-31,430.00	219,990.00

Deductions - Income Tax

Payable: 1,000.00 Recovered till August-2018: 100.00 Exempted: 400.00 Recoverable: 500.00

Gross Pay (Rs.): 62,358.00 Deductions: (Rs.): -35,657.00 Net Pay: (Rs.): 26,701.00

Payee Name: IMTIAZ
 Account Number: 8858-6
 Bank Details: NATIONAL BANK OF PAKISTAN, 230591 ABBOTTABAD CITY BRANCH ABBOTTABAD CITY BRANCH, ABBOTABAD

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: ATD Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address:
 City: Email: imtiazkharpir@gmail.com

Monthly Salary Statement (August-2018)
 District Accounts Office Abbottabad
 Dist. Govt. WFP-Provincial

10/11/18
 10/11/18

Personal Information of Mr. MITAZ Dawood KHAN BHALAIGAR
 Personnel Number: 00090832 CNIC: 1510108430453
 Date of Birth: 15-01-1967 Employee Grade: Service: 01.00 1984 Length of Service: 24 Years 00 Months 101 Days

Employment Category: Vocational Permanent
 Designation: PRIMARY SCHOOL TEACHER
 DDO Code: D/15-D/ DISTT OFFICER (M.P.R) ATD
 Pay and Allowances: Pay Scale: BPS-13
 Pay Band: BPS-13
 Pay Stage: 30
 GPF Balance: 222,192.00
 Interest Applied: Yes
 GPF Section: 001
 Cash Control: 07
 District Section: 003

Sl. No.	Wage type	Amount	Wage type	Amount
2324	Adhoc Relief All 2017 10%	4,150.00	Adhoc Relief All 2018 10%	4,150.00
2329	Adhoc Relief Allow 10%	07.00	Adhoc Relief All 2018 10%	3,393.10
1902	Incentive Allowance 20%	1,000.00	15% Adhoc Relief All 2018	972.00
1210	Convey Allowance 200%	2,328.00	Medical Allowance	1,200.00
0001	Basic Pay	41,200.00	Houses Rent Allowance	2,001.10

Deductions - General

Sl. No.	Wage type	Amount	Wage type	Amount
004	R. Benefits & Death Comp.	-1,023.00		0.00
300	Income Tax	-20.00	Emp. Edu. Fund 10%	-122.00
2013	GPF Subscription - Rs.2400	-2,400.00	Reversion Fund	-601.00

Deductions - Loans and Advances

Sl. No.	Description	Principal amount	Deduction	Balance
002	GPF Loan Principal Interest	440,000.00	31,430.00	218,990.00

Physical: 1,000.00 Recovered till August-2018: 50.00 Exempted: 400.00 Recoverable: 500.00
 Deductions - Income Tax

Gross Pay (Rs.): 67,128.00 Deductions (Rs.): -32,627.00 Net Pay (Rs.): 34,501.00

ABBOTABAD
 Head Office: NATIONAL BANK OF PAKISTAN, 250291 ABBOTTABAD CITY BRANCH
 Account Number: 8826-6
 Payee Name: MITAZ

Less: Opening Balance: Available: Landed: Balance:

Permanent Address: District: NW - Khyber Pakhtunkhwa
 City: ATD
 Temp. Address: Email: mitaz.bhalai@gmail.com
 City: Homeing Status: No Official

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



Serial No. 251457

Name: IMTIAZ KHAN
 Father's Name: KHAN BAHADAR
 Address: VILLAGE AND PO KHARPIR

Roll No. AH351458
 Registration No. 10NADO1174
 Final Semester AUT-2015

Annex G

Tehsil: ABBOTTABAD
 District: ABBOTTABAD
 has successfully completed HIGHER SECONDARY SCHOOL CERTIFICATE
 GROUP-GENERAL

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 10	0317	PAKISTAN STUDIES (C)	100	50
AUT- 10	0363	URDU-I	100	48
AUT- 10	0316	ISLAMIAT (C)	100	57
SPR- 12	0364	URDU-II	100	54
SPR- 12	0321	MUSLIM HISTORY OF SUB-CONTINENT	100	64
AUT- 12	0387	COMPULSORY ENGLISH-II	100	55
SPR- 13	0386	COMPULSORY ENGLISH-I	100	58
SPR- 14	0343	ISLAMIAT (C)	100	61
SPR- 14	0376	HUMAN RIGHTS	100	56
AUT- 14	0312	EDUCATION	100	67
AUT- 15	0346	PRINCIPLES OF COMMERCE	100	56

CREDITS: 8

Total Marks / Obtained

1100/ 626

Result Declared on AUGUST 25, 2016

Percentage / Grade 57 C

Date of issue AUGUST 31, 2016

[Signature]
Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Alama Iqbal Open University
Islamabad

12



Serial No 147762

Certified that Mr/Ms IMTIAZ KHAN

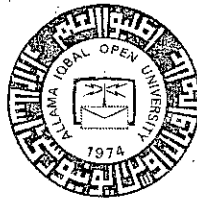
Son/Daughter of KHAN BAHADAR

Registration No 10NAD01174 Roll No AH351458

Semester Autumn 2015 having met all the requirements under
the semester system is this day awarded the

Higher Secondary School Certificate
Group - General

He/She has secured 57 %marks
and has been placed in C grade



Result declared on: August 25, 2016

Controller of Examinations

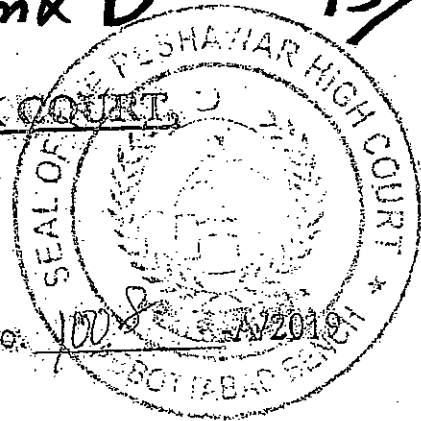
Date of issue: December 06, 2016

RMP

Muhammad

12

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH



Writ Petition No. 1008/2019

1. Muhammad Kaleem GPS Thora Kalan District Abbottabad
2. Qadeer Ahmed GPS Batangi, District Abbottabad.
3. Mahammad Tariq GPS Lora, District Abbottabad.
4. Aqeel Ahmed GPS Tarar, District Abbottabad.
5. Muhammad Zaheer GPS Goreeni, District Abbottabad.
6. Mujeeb-ur Rehman GPS Goreeni, District Abbottabad.
7. Mir Baz Khan Fatoh, District Abbottabad.
8. Muhammad Iqbal GPS No. 4, District Abbottabad.
9. Rab Nawaz
10. Imtiaz Khan
11. Muhammad Javed
12. Khawaja Waqar GPS Dara Aman, District Abbottabad.
13. Sajid Mehmood
14. Mubarak Ali
15. Safdar Hussain
16. Nusrat Iqbal GPS Thana Karamshah, District Abbottabad.
17. Zahoor Ahmed GPS Mora Changra, District Abbottabad.
- Shfiqie GPS Chehr, District Abbottabad.

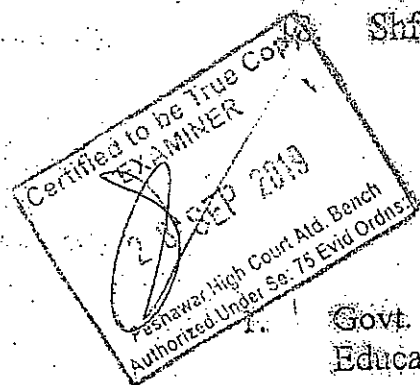
...PETITIONERS

VERSUS

1. Govt. of Khyber Pakhtunkhwa, Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

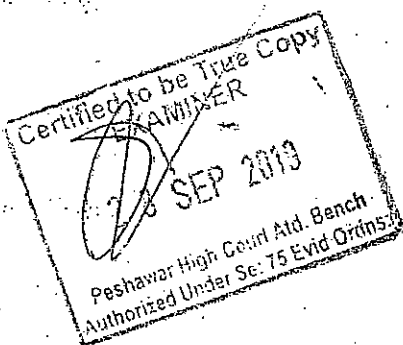
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Abbottabad.
4. District Account Officer, Abbottabad.

...RESPONDENTS



WRT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 FOR DECLARATION TO THE EFFECT THAT THE PETITIONERS ARE *SI/86* ELIGIBLE FOR PROMOTION FROM SPST BPS-14 TO PHST BPS-15 AS PER PROMOTION POLICY 2013 BUT THE RESPONDENTS ARE NOT PROMOTING THE PETITIONERS FROM THE POST OF SPST TO PHST DUE TO THE REASONS THAT AS PER NEW POLICY/ RULES, NOTIFICATION DATED 30/01/2018 QUALIFICATION FOR UP-GRADATION/ PROMOTION FOR PHST IS BA WHEREAS, IN THE OLD POLICY OF 2013 THE QUALIFICATION FOR PROMOTION TO THE SAID IS BA, HENCE THE PETITIONERS ARE ELIGIBLE TO BE PROMOTED AS PHST BPS-15 AS PER POLICY 2013.

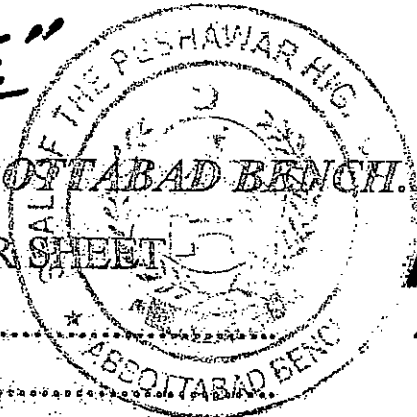
PRAYER: ON ACCEPTANCE OF THE INSTANT WRT PETITION, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO UP-GRADE/ PROMOTE THE PETITIONERS



Annex "E"

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET



Court of

Case No. of

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
26.09.2019	<p><u>WP No. 1008-A/2019.</u></p> <p>Present: Mr. Muhammad Arshad Khan Tanoli, Advocate for petitioners.</p> <p>***</p> <p><u>IJAZ ANWAR, J.</u> Through this petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioners Muhammad Kaleem & seventeen others have made the following prayer:-</p> <p style="text-align: center;"><i>That on acceptance on instant writ petition, respondents may graciously be directed to upgrade/promote the petitioners from SPST BPS-14 to PHCT BPS-15 under the old policy of 2013.</i></p> <p>2. At the very outset, learned counsel for petitioners when confronted that the question raised in the instant writ petition relates to the terms and conditions of service he stated that petitioners would not press this petition anymore, if this writ petition is converted into departmental representation/s and send the same to the respondent/department for its decision.</p> <p>3. In view of the peculiar facts and circumstances of</p>

Certified to be true Copy
 27 SEP 2019
 Peshawar High Court, Abbottabad Bench
 Authorized Under Section 15 Extraordinary

the present writ petition, this Court in the larger interest of justice, and in the light of case law reported as 2017 PLC (C.S), 692 and 2004 PLC (C.S) 1240, treats the present petition as departmental representation/s of the petitioners with directions to respondent/department to consider the grievance of petitioners and decide the matter, strictly in accordance with the law, within statutory period and decisions so made be also communicated to the petitioners. In case the petitioners find themselves still aggrieved after the receipt of reply or if no reply is received, the petitioners may approach the competent forum for the redressal of their grievance.

Sd/ JUDGE

Sd/ JUDGE

Certified to be true copy
 17 SEP 2019
 Registrar High Court
 75 Evid Ordin

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Qual/Qualia

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = _____
Qual Award from a recognized Institution	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
B.A/BSc	Marks obtained X 20 / total marks = _____
MA/MSc/M.Ed/MA Edu	Marks obtained X 15 / total marks = _____
MPhil/PhD	Marks = 05

Certified Teacher
(General, Industrial Arts, Agriculture, Home Economics)

Category of Qualification	Total Marks 100 For Humanities group at Intermediate/Graduation Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	3 Extra marks for HSSC, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = _____	
B.A/BSc	Marks obtained X 20 / total marks = _____	
CT Certificate/Diploma in Education /A.D.E.	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed/MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for P.Sc. 5 Extra marks for B.Sc. and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
DM Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for P.Sc. 5 Extra marks for B.Sc. and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

ANNEXURE "F"

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~~ANNEXURE B~~

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

~~Page~~

Peshawar, dated the November 13, 2012.

No. SO/P/14-5/SSRC/Meeting/2012/Teaching Cadre- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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


Encl. No. 6. Date as above.

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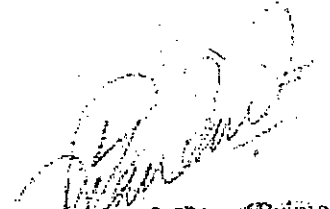
1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.

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1. The Director Curriculum & Teachers Education Abbottabad.
2. The Director (PTE) Khyber Pakhtunkhwa Peshawar.
3. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. The Deputy Director Database (EMIS) E&SE Department.
5. All District Coordination Officers in Khyber Pakhtunkhwa.
6. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
7. All District Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers FATA.
8. All Agency Education Officers FATA.
9. P.S to Governor, Khyber Pakhtunkhwa.
10. P.S to Chief Minister, Khyber Pakhtunkhwa.
11. P.S to Chief Secretary, Khyber Pakhtunkhwa.
12. P.S to Minister E&SE Khyber Pakhtunkhwa Peshawar.
13. P.S to Secretary E&SE Department.
14. Master File.


Section Officer (Primary)

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APPENDIX

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No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16)	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from a recognized University; or (ii) M.A. in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3; (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;

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				(iv) one per cent from amongst Instructional Material Specialists with atleast five years service such and having qualification mentioned in column No. 3; and (v) one per cent from amongst Arabic Teachers with at least 5 years service as such and have qualification mentioned in Column No. 3; and (b) fifty per cent by initial recruitment.
2.	Senior Arabic Teacher (SAT) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4.	Senior Certified Teacher (SCT) (General) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teacher (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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	Senior Certified Teacher (Industrial Arts) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teacher (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).
7.	Senior Drawing Master (BPS-16).		By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
8.	Senior Certified Teacher (SCT) (Home Economics) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
9.	Senior Physical Education Teacher (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

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		(i) Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamiya Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamiya from a recognized Tanzimatul Wafaqul Madaris, or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. Note: In case of non availability of suitable person for promotion, then by initial recruitment.
12.	Senior Qari (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least 5 years service as such and having qualification prescribed for initial recruitment.
13.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

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

	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment:</p>
<p>13. Certified Teacher (Agriculture) (BPS-15).</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government Institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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

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		University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).		<p>Certified Teacher (Home Economics).</p> <p><u>Note:</u> In case of non-availability of suitable person for promotion, then by initial recruitment.</p>
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed in initial recruitment of Drawing Master.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>

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	Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year Junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher. Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher. <u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.
19.	Primary School Head Teacher (PSHT) (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers.

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21.	Primary School Teacher (BPS-12)	(i) Intermediate or equivalent qualification from a recognized Board with Primary School Teacher Certificate Diploma in Education from a recognized Institute; or (ii) Secondary School Certificate from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	18 to 35 years.	with at least five years service as such having qualification prescribed for initial recruitment of Primary School Teacher. By initial recruitment on merit at Union Council level; provided that if no suitable candidate within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Saad from a recognized Institution.	18 to 35 years.	By initial recruitment.

~~P-48~~ ~~15~~ 28

SCHEDULE

Selection criterion and other conditions for direct recruitment against the below mentioned posts shall be as in

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
BA/BSc	Marks obtained X 20 / total marks = _____
M.A Arabic / Shikhsatul Uloomul Arabia wal Islamiya from a recognized Tanzeematul Wafaqul Madaris	Marks obtained X 20 / total marks = _____
Other MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____
MPhil/PhD	Marks = 05

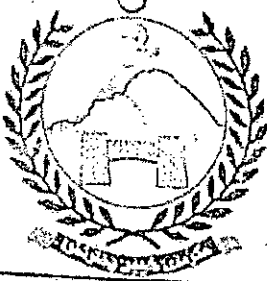
Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
BA/BSc	Marks obtained X 20 / total marks = _____
M.A MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = _____
M.A Islamiya / Shikhsatul Uloomul Arabia wal Islamiya from a recognized Tanzeematul Wafaqul Madaris	Marks obtained X 15 / total marks = _____
MPhil/PhD	Marks = 05

Annex "G"

31

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



No. 3052 / ADEO LIT

Dated: 18/12/2019

0992-9310102, 0992-330131

EDO.Education.Atd@gmail.com

To

1. Mr. Muhammad Kaleem GPS Thora Kalan District Abbottabad.
2. Mr. Qadeer Ahmad GPS Batangi, District Abbottabad.
3. Mr. Muhammad Tariq GPS Lora, District Abbottabad.
4. Mr. Aqeel Ahmed GPS Tarar, District Abbottabad.
5. Mr. Muhammad Zaheer GPS Goreeni, District Abbottabad.
6. Mr. Mujeeb-ur-Rehman GPS Goreeni, District Abbottabad.
7. Mr. Mir Baz Khan Fetei, District Abbottabad.
8. Mr. Muhammad Iqbal GPS No. 4, District Abbottabad.
9. Mr. Rab Nawaz
10. Mr. Imtiaz Khan
11. Mr. Muhammad Javed
12. Mr. Khawaja Waqar GPS Dara Aman, District Abbottabad.
13. Mr. Sajid Mahmood
14. Mr. Mubarak Ali
15. Mr. Safdar Hussain
16. Mr. Nusrat Iqbal GPS Thana Karamshah, District Abbottabad.
17. Mr. Zahoor Ahmed GPS Mora Changra, District Abbottabad.
18. Mr. Shafique GPS Chehr, District Abbottabad.

Subject: DECISION ON DEPARTMENTAL REPRESENTATIONS IN THE LIGHT OF JUDGMENT DATED 26-09-2019 PASSED IN WP NO. 1008-A/2019 TITLED MUHAMMAD KALEEM & OTHERS VS GOVT OF KHYBER PAKHTUNKHWA & OTHERS

In pursuance to the judgment of Honourable Peshawar High Court Abbottabad Bench Passed in WP No. 1008-A/2019 dated 26-09-2019, undersigned, examined the case of the petitioners thoroughly.

In view of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, petitioners do not fulfill the requisite eligibility criteria for promotion hence, departmental representations of petitioners are hereby rejected accordingly.

District Education Officer (M)
Abbottabad.

Copy forwarded for information to the:-

1. Additional Registrar Peshawar High Court Abbottabad Bench with reference to above referred Writ Petition.
2. PA to Deputy Secretary (Legal) E&SED, Khyber Pakhtunkhwa, Peshawar.

District Education Officer (M)
Abbottabad.

REGISTERED POST MOST URGENT BEING COURT MATTER
OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



No. 11241/ADEO(Lit)

Dated: 15/10/2019

32



0992-9310102, 0992-330131

EDO.Education.Atd@gmail.com

To

The Director,
E&SE Khyber Pakhtunkhwa,
Peshawar.

Subject:

DECISION ON DEPARTMENTAL REPRESENTATIONS IN THE LIGHT OF
JUDGMENT DATED 26-09-2019 PASSED IN WP NO. 1008-A/2019 TITLED
MUHAMMAD KALEEM & OTHERS VS GOVT. OF KHYBER
PAKHTUNKHWA & OTHERS.

It is submitted that Petitioners filed WP No. 1008-A/2019 before the Honourable Peshawar High Court Abbottabad Bench to effect that the petitioners are eligible for promotion from SPST (BPS-14) to PSHT (BPS-15) as per Policy 2013, but the respondents are not promoting the petitioners from the post of SPST to PSHT due to the new Recruitment Rules/Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, wherein, for qualification for upgradation for PSHT is B.A whereas, in the Policy of 2013 the qualification for promotion was F.A and Honourable Peshawar High Court Abbottabad Bench passed the judgment dated 26-09-2019 in the above referred Writ Petition and the operative part of the judgment is reproduced as under:

"In view of the peculiar facts and circumstances of the present writ petition, this Court in the larger interest of justice, and in the light of case law reported as 2017 PLC (C.S), 692 and 2004 PLC (C.S) 1240, treats the present petition as departmental representation/s of the petitioners with directions to respondent/department to consider the grievance of petitioners and decide the matter, strictly in accordance with the law, within statutory period and decisions so made be also communicated to the petitioners. In case the petitioners find themselves still aggrieved after the receipt of reply or if no reply is received, the petitioners may approach the competent forum for the redressal of their grievance." (Attested copy of judgment attached)

Furthermore, legal notice No 0005 dated 07-10-2019 was also received to this office from the office of Muhammad Liaqat Advocate High Court Abbottabad regarding the same subject matter. (Copy of legal notice attached).

It is, therefore, your gracious honour is requested to refer the instant case to worthy Secretary E&SE for appropriate decision.

District Education Officer (M)

at Abbottabad

Dated: 15/10/2019

Endst: No. 11242

Copy forwarded for information to the:

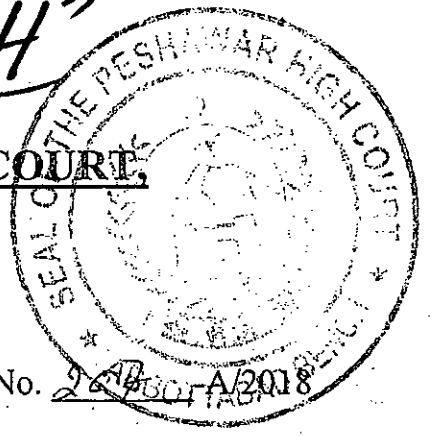
PA to Deputy Secretary (Legal) E&SED Khyber Pakhtunkhwa, Peshawar.

District Education Officer (M)

at Abbottabad

33/ Annex "H"

BEFORE THE PESHAWAR-HIGH COURT,
ABBOTTABAD BENCH



Writ Petition No. ~~247~~ A/2018

Muhammad Ali son of Muhammad Manzoor, resident of Dheri Kiala, Lora, Union Council Lora, Tehsil Havelian, District Abbottabad.

...PETITIONER

VERSUS

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

...RESPONDENTS

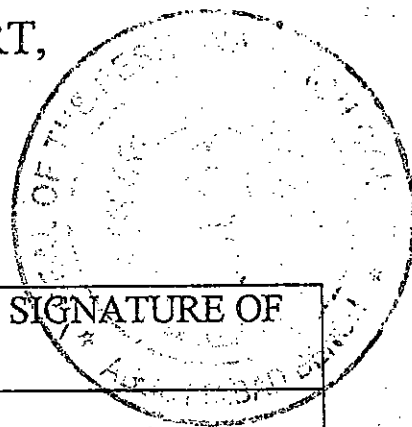
WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973, FOR ISSUANCE OF A DECLARATION TO THE EFFECT THAT PETITIONER BEING QUALIFIED AND HAVING PASSED NTS EXAMINATION WAS ENTITLED TO BE APPOINTED AS PST IN GPS NAGRI TUTIAL UNION COUNCIL NAGRI TUTIAL OR GPS RAHI UNION COUNCIL PHALLAH AS PER CLAUSE 1 OF ADVERTISEMENT PUBLISHED BY RESPONDENTS AND REFUSAL OF

No. 1042
217/18

Certified Copy
Peshawar High Court A.d. Bench
Authorized Under Sec. 75 Evld Ordns.

[Handwritten signature]

PESHAWAR HIGH COURT,
ABBOTTABAD BENCH
FORM 'A'
FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
07.11.2018	<p><u>W.P No. 207-A/2018.</u></p> <p>Present:- Mr. Awais Abbasi, Advocate for the petitioner.</p> <p>Sardar Muhammad Asif, AAG for the respondents.</p> <p>***</p> <p><u>SYED MUHAMMAD ATTIOUE SHAH, J.-</u> Petitioner</p> <p>Muhammad Ali has invoked the constitutional jurisdiction of this court praying that:-</p> <p><i>“On acceptance of this writ petition, the respondents may graciously be directed to forthwith issue appointment order of the petitioner on the post of PST (BPS-12) with immediate effect in GPS Nagri Tutial Union Council Nagri Tutial or GPS Rahi Union Council Phalla. Any other relief as may be deemed fit and proper in the circumstances of the case.”</i></p> <p>2. In essence, the case of petitioner is that as per Clause-I of the advertisement dated 30.08.2016, when no candidate was available in the concerned union council, then the candidate from adjacent union council was to be considered and since the petitioner was hailing from the</p>

adjacent union council, therefore, he was required to have been appointed on the subject post.

3. Respondents were put on notice who appeared and contested the petition by filing their para-wise comments wherein they have relied upon the notification dated 30.01.2018 whereby amendment was made against Serial No. 1 in column No. 3 & 4 of the appendix to Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and submitted that the petitioner was not having the requisite qualification for his appointment.

4. Arguments heard and record perused.

5. Perusal of record reveals that the respondents advertised posts of PST through advertisement dated 30.08.2016, wherein it has clearly been mentioned in clause-I of terms and conditions of advertisement that when a candidate in the concerned union council is not available, then the candidate from the adjacent union council would be considered. It is very much clear from the record as well as comments filed by the respondents that the petitioner fulfill the criteria for his appointment against the subject post.

6. So far as the contention of the respondents that in the light of notification No. SO (PE)4-5SSRC/Meeting/2012/Teaching Cadre/2017 dated 30.01.2018, the petitioner was lacking the requisite

qualification, is concerned, suffice it to mention that in advertisement dated 30.08.2016, the respondents advertised certain posts of Primary School Teacher (PST) and the requisite qualification for the said post was mentioned in the advertisement as Intermediate or equivalent certificate from any recognized board along with Primary School Teacher Certificate or SSC Second division along with two years Associate Degree in Education from any recognized University. Consequent to the said advertisement, several candidates including the petitioner, having qualification upto intermediate, have applied for the said post and appeared in the screening test and some of them having the same qualification, were also appointed against the vacant posts after qualifying the test and interview. Moreover, the advertisement was issued on 31.08.2016 and consequent thereof, the appointments were made on 10.04.2017, whereas the amendment in the rules through the ibid notification was made on 30.01.2018. There is no mention in the notification dated 30.01.2018 that the same would have retrospective effect, therefore, the petitioner carrying the qualification mentioned in the advertisement, would not be subject to the ibid amendment and the respondents without any whim and reason have refused to appoint him which is otherwise against the very terms and conditions of their advertisement.

7. Resultantly, while accepting this writ petition, we direct the respondent No. 1 to consider the petitioner for his appointment against the subject post in accordance with law.

Announced.
07.11.2018

JUDGE

JUDGE

Certified to be True Copy
EXAMINER
23 NOV 2018
Peshawar High Court Afd. Bench
Authorized Under Sec: 75 Evid Ordns.

Tufail*

Hon'ble Justices Lal Jan Khattak & Syed Muhammad Attique Shah.

Amma "I" 38



**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
PH: 091-9225344 / Fax: 091-9225345 Email: zulfiqarculum@kpnep.edu.pk

No. _____ Dated ____/____/2018

Near: Government Shaheed Hussain Sharif Higher Secondary School No-1 City Peshawar.

MINUTES OF THE DPEC MEETING WITH DEOs (M&F) ON May 08, 2018.

Venue: Committee room Directorate of E&SE YP, Peshawar

Timing: 09:00 AM to 04:00 PM

Chaired By: Mr. Farid Khattak Director E&SE KP, Peshawar

Participants: List Attached.

Proceedings:

A meeting was held on 08/05/2018 at Committee room of E&SE KP, Peshawar. The meeting was chaired by Mr. Farid Ahmad Khattak Director E&SE KP, Peshawar local office. The meeting started with the recitation from the holy Quran.

The participants discussed the following agenda items & agreed upon the following points:

S. #	Activity	Decisions	Responsibility
1	Construction of Group Latrines for Girls Student under Conditional Grant 2017-18	The chair directed DEOs concerned to construct group latrines (only for girls' schools) under CG 2017-18 as per the decision of Secretary E&SE in the light of court decision. Work on the rest of schemes/facilities must not be started till the decision of socio-eng meeting team.	DEOs
2	Pending facilities under CG 2014-15, 2015-16 & 2016-17	The chair shared the grievance of worthy Secretary E&SE regarding pending facilities under CG 2014-15, 2015-16 & 2016-17 on which work still not completed. He also directed DDU team to share the list of pending facilities with concern DEOs and also a copy of it may also be provided to the chair. The chair further directed the concerned DEOs to provide school wise lists of pending facilities & complete all such pending facilities and work on such facilities may also be monitored on weekly basis.	DDU team DEOs
3	Purchase of Science Equipment for Schools, F&F IT Equipment for newly created SDEOs Offices	The chair was informed by a few DEOs that their respective Deputy Commissioners are not willing to convene the purchase committee meetings for the purchase of Science Equipment, F&F and IT equipment for newly established SDEOs offices. The chair directed DEOs to constitute local committee under their personal chairmanship and ensure the utilization of the budget under the said heads up to 30 th May 2018. (The target get was set by all the DEOs)	DEOs

SC/

Note: All employees E&SE department & other interested ones, please type "Follow: Dir_ESE_KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile



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

PH: 091-9225344 / Fax: 091-9225345 Email: zofficial@khwa.gov.pk

No. _____ Dated ___/___/2018

Re: Government Shaheed Hussain Sharif Higher Secondary School No-1 City Peshawar.

4	Autonomy of HSS	The chair directed the DEOs to shift the funds under hiring of teachers (only) in Autonomy budget of HSS to the PTC accounts of the respective school to be utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring. Chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSSs/GHSSs to discuss the issues in the utilization of autonomy budget and its resolution.	DEOs
5	Release of Remaining 25% budget under Non-salary head	It was revealed that almost 70% of the budget under Non-Salary head have been utilized therefore the chair directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of Conveyance Charges for Female ASDEOs	As per the direction of the Secretary E&SE, utilization under this head is alarmingly low, therefore as per decision of the Secretary E&SE the chair further directed DEOs to submit & clear all the pending bills immediately & in future submits all such bills along with relevant documents to the account offices up to 5 th of each month for clearance. The bills of previous month (if not cleared for any reason) shall not be paid to the ASDEOs afterwards.	DEOs
7	Reporting of issues regarding budget execution to Directorate	It was revealed in the meeting that some DEOs have issues on part of DC office, DO (F&P) and District Govt. with reference to the budget execution. In this regard the Deputy Director P&D suggested that they should report such issues well in time to Directorate in order to tackle such issues immediately at proper forums.	DEOs
8	GPS Coordinates for developmental schemes	Regarding PC-1 for developmental schemes Deputy Director P&D suggested the DEOs to send GPS coordinates/ GIS map location with PC-1 for proper verification of the proposed site. Sample GPS coordinates/ GIS map sheet will be shared with all DEOs via email.	DEOs DD P&D
9	Vacant Positions	All the DEOs (Male & Female) directed to provide vacant position of all cadres & data regarding retirement of personnel (from 1 st April 2018 to 30 th September 2018) of each cadre with proper school wise STR must be sent ASAP.	DEOs DD P&D
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPSTs/PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment.	DEOs

Note: All employees E&SE department & other interested ones, please type "Follow Dir. E&SE KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA
Cell: 091-9225314 / Fax: 091-9225315 Email: zulfiqar@omilk@gmail.com

No. _____ Dated ___/___/2018

Near: Government Shaheed Hussain Sharif Higher Secondary School No-1 City Peshawar.

11	Posting/ Transfer of NTS appointed teachers	The chair directed to implement wadlock policy regarding transfer of employees appointed through NTS in addition to mutual transfers and exigency as per rules and regulations already notified	DEOs
12	Late time school visits	DEOs to ensure surprise visits of their schools after the duty hours to prevent the un-authorized use of school buildings/resources	DEOs
13	Communication with District Officials	Chair directed DEOs to respond the official calls/ SMS/ emails within the duty hours as well as after the close of business. All of them must follow the official WhatsApp group and not to quit it. The officials are advised to use the official WhatsApp group for only relevant contents /communications	DEOs
14	Scout	DEOs are directed not to follow the orders /instructions/ suggestions of personnel not related to the E&SE Department regarding scout activities	DEOs
15	Social media communication	With reference of the CS directives all the DEOs (M&F) directed to create their official district level Face book & Twitter accounts, update them regularly and share their proper links along with details of focal person with DD P&D immediately	

5742-93

Deputy Director (P&D)
E&SE Khyber Pakhtunkhwa

Endstt: No _____ Meeting minutes/DPES-I/ Dated 11/11/18

Copies communicated to;

1. PS to Director local office
2. All the DEOs (M&F) for information & proper compliance
3. Office file

Deputy Director (P&D)
E&SE Khyber Pakhtunkhwa

Note: All employees E&SE department & other interested ones please type "follow Dr. ESKP" in your mobile message & send it to 9999 to get the link of Directorate of E&SE KP Peshawar on your mobile.

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
PH:091-9225344/Fax 091-9225345 Email: zulfiqarulmalik@gmail.com

NEAR GOVERNMENT SHAHEED HUSSAIN SAIF HIGHER SECONDARY SCHOOL NO. -1 CITY PESHAWAR.

4	Autonomy of HSS	The Chair directed the DEOs shift the funds under hiring of teachers fondly in Autonomy budget of HSS to the PTC accounts of the respective school to utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSS and GGHSSs to discuss the the agues in the mutation of autonomy budget and is resolution	DEOs
5	Release of reaining 25% budget under non salary head	It was fevered that their brost to the budget under non salary have been utilized therefore the other directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of conveyance chaiges for female asdeos	As per the direction of secretary E&SE utilization under this head is alarmingly low therefore as set per decision of the secretary E&SE the Chair further directed DEOs to submit &their all pending bills immediately and in future submits all such bills along with relevant documents to teh account offices up to 5th of each month for clearance the bills of previous month not cleared for any reason not be paid to the ASDEOs afterwards	DEOs
7	Reporting of ussues regarding budget execution to directorate	It was revealed in the meeting thatsome DEOs have ussues on part of DC office DOE&P and District Govt with refrence to the execution with this regard the deputy Director PSD suggested that they should report such issues within time to directorate in order to such issues well immediately at proper forums.	DEOs
8	GPS coordinates for developmental schemes	Regarding PC 1 for developmental schemes deputy Director P&D suggested the DEPs to sent GPS coordinates GIS map location with PC 1 for proper verification of the proposed site sample GPS coordinates GIS map sheet will be shared with all DEOs by email	DEOs DD P &D
9	Vacant Positions	All the DEOs (Male & Female directed to provide vacant position of all cadres & data regarding retirement of persons from 1st April 2018 to 30th September 2018 mst be sent ASAP	DEOs DD P &D
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPSTs, PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction recruitment.	DEOs

Note: All employees E&SE department & other interested please type "Follow Dir_ESE_KP" your mobile massage and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
PH:091-9225344/Fax 091-9225345 Email: zulfiqarulmalik@gmail.com

NEAR GOVERNMENT SHAHEED HUSSAIN SAIF HIGHER SECONDARY SCHOOL NO. -1 CITY PESHAWAR.

4	Posting transfer of NTS appointments Teachers	The Chair directed to implement wedlock policy regarding transfer of employee appointed through NTS in addition to mutually transfers and agency as per rules and regulations already notified.	DEOs
5	Late time school Visit	DEOs to ensure surprise visit of schools after the duty hour to provincial un authorize of shcool buildings assurance .	DEOs
6	Communication with District Official	Chair Directed DEOs to respond the official calls/SMS Emails within the duty hours as well as after the close of business all of them must follow the official whatsapp group and not to quite if the officials are advised to use the official whatsapp group for only relevant contents /communication	DEOs
7	Scout	DEOs are directed not to follow the orders/instruction/ suggestions of personal not related to the E&SE department regarding scout activities.	DEOs
8	Social mean communication	With refrence of the S directive all the DEOs(M&F) directed to creat their official district level face book & twitter accounts update them regularly and share and share their prior this along with details of fact person with DDP&D immediately	DEOs DD P &D

Deputy director (P&D
E&SE Khyber Pakhtunkhwa

Endst No. _____ Meeting minutes/DPES-1/dated _____

Copies communicated to:

1. PS to Director Local Office
2. All the DEOs (M&F for information & proper compliance
3. Office file

Deputy director (P&D
E&SE Khyber Pakhtunkhwa

Note: All employees E&SE department & other interested please type "Follow Dir_ESE_KP" your mobile massage and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

NOTIFICATION

The Committees comprising the following officers/officials is hereby constituted to examine, check and scrutinize the documents regarding promotion from PST to SPST, SPST to PSHT, PSHT to CT, PET & DM and recommend the name of eligible candidates for promotion.

Committee	Name of Officer	Designation	Cadre	Date of Scrutiny	Place of Scrutiny
1	Babu Jehangir	SDEO (M) Abbottabad	PST to SPST	01/3/10/2019	DEO (M) Office Attd
	Muhammad Naseer	SDEO (M) Lora	do	do	do
	Zaheer Ahmed Qureshi	Superintendent			
	Naqash Khan	ASDEO Circle Abbottabad	do	do	do
	Muhammad Bashir	Assistant	do	do	do
2	Abdul Qayyum	SDEO (M) Havelian	SPST to PSHT	do	do
	Arshad Mehmood	ADEO (E) Primary			
	Syed Mehmood ul Hassan	ASDEO Circle Havelian	do	do	do
	Muhammad Saeed	B&AO Local Office	do	do	do
	Asif Khan	ASDEO Circle Dhamtour	do	do	do
	Muhammad Zaman	Assistant Local Office	do	do	do
3	Mahroof Khan	SDEO (M) Lower Tanawal	PSHT to CT, DM, PET	do	do
	Zubair Ali	ASDEO Circle P. K. Khan	do	do	do
	Irshad Ali	ASDEO Circle Nathla Gali	do	do	do
	Rab Nawaz Khan	ADEO (E) Secondary	do	do	do
	Aqeel Khan	J/C Local Office	do	do	do

Note: All the ASDEOs Circle are directed to be present during the scrutiny of documents during the above period.


 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

ndst. No. 17/1/1 /Promotion SPST to PSHT

Dated 16/4 /2019

Copy forwarded to the:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy District Education Officer (M) Local Office
3. All the Member of Committee


 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

وکالت نامہ

کورٹ فیس

بعدالت جناب سرورس ایجوکیشنل R.P.K بسکاور
 عنوان: اختیار خان گورنمنٹ R.P.K وینرہ
 منجانب: ایپل منٹ
 نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے اسے پیروی و جواب دہی کل کاروائی متعلقہ آس مقام
 محمد لیاقت ایجوکیشنل ایسٹ کورٹ

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 پر داختم 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 جزو بقایا ہو تو وکیل صاحب موصوف
 مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کے
 پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

Atteste d
 Accepted

المرقوم: 25-12-19

بمقام:

العبد

العبد

اختیار خان وکیل صاحب خان صاحب
 دس پیسے لکھ بیک ایسٹ ایسٹ

9-7-19

"A"

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

No. TB
APPEAL No.....2232..... of 20 19

Imtiaz Khan

Appellant/Petitioner

Versus

Through Secy. Educ. in Pk Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner..... Muhammad Liaqat
Advocate High Court
Abul Talab

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-1-2021 at 9:00 A.M.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court Abul Talab

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

TB

APPEAL No. 2232 of 20 19

Munir Khan

Appellant/Petitioner

Versus

Through Secy Edn: Mr. P. P. P. P.

RESPONDENT(S)

✓
Notice to Appellant/Petitioner

Munir Khan Secy Edn: Mr. P. P. P. P.
Presently at S. G. P. S. Ghaur Pan
Tehsil & Distt: M. A. B. B. B.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-1-2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court A. Road

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

“B”

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

No.

Appeal No. of 20 .. TB

2232

19

Appellant/Petitioner

Imtiaz Khan vs

Respondent

Through Secy: Edus: Pesh

Respondent No.

3

Notice to: —

Distt. Education Officer Gwat. (Male)

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.....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.....

Day of.....20

Jan:

22

7/14

at Camp Court A. Ahmed

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.

Appeal No. 2232 of 20 19

Mirza Khan Appellant/Petitioner

Versus

Through Secy. Edu: 14 Pt. Pesh: Respondent

Respondent No. 4

Notice to: Sub-Divisional Education Officer (M)
Lower Tanawal Abettabad

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 17-2-2022 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 7th Day of Jan: 2022

At Court A-Head

[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.

Appeal No. 2232 of 20 19

Muniaz Khan Appellant/Petitioner

Versus

Through Secy: K.P.C. Pesh. Respondent

Respondent No. I

Notice to: —

Genl: of K.P.C. Through Secy: Education
Peshawar.

[Handwritten signature]
20/1

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 17-2-2022 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 7th

Day of Jan 20

at Camp Court A. Shah

[Handwritten 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.

TB

Appeal No.....2232..... of 20 19

.....Miriaz Khan.....Appellant/Petitioner
Versus

.....through Serj. Edw. J. P......Respondent
Respondent No.....2

Notice to: —

Director, E.I. & Sec. Edw. Govt. of P.A.s
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.....17-2-2022.....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.....7th.....
Day of.....Jan.....20 22

at Camp Court A. Akbar
21-1-22

[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.

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2232/2019

Imtiaz KhanAppellant

VERSUS

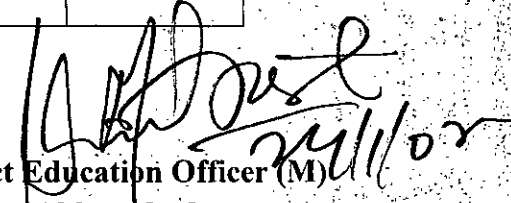
Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

INDEX

Sr.No	Description	Page Nos	Annexures
1	Comments alongwith affidavit.	01 to 04	
2	Copy of Notification dated 30-01-2018	05 to 08	"A"

Dated: 24-01-2022


District Education Officer (M)
Abbottabad.

(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD,
Appeal No. 2232/2019

Imtiaz KhanAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

Comments on behalf of Respondents are submitted as under:-

Preliminary objection:-

1. That the appellant has no cause of action to file the instant appeal.
2. That the appeal is hopelessly time barred hence, liable to be dismissed.
3. That the instant appeal is not maintainable in its present form.
4. That the appellant has no locus standi to file instant appeal.
5. That the appellant has filed the present appeal just to pressurize the respondents.
6. That the appellant has not come to this Honorable Tribunal with clean hands hence, not entitled for any relief.
7. That the appellant is estopped to sue due to his own conduct.
8. That the instant appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.
9. That the instant appeal is against the Law, Rules and Policy hence, liable to be dismissed.
10. That in view of Notification No. SO (PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 appellant do not fulfill the requisite criteria for promotion.
11. That the appellant did not challenge Notification No. SO (PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 hence, instant appeal is liable to be dismissed.
12. That it is the sole prerogative of the Executive Authorities to frame policy are amend rules in accordance with the exigencies of service to cope up with the ever changing requirements and the cannot substitute

its views in the decision of the government with regard to the policy matters.


Factual Objections:-

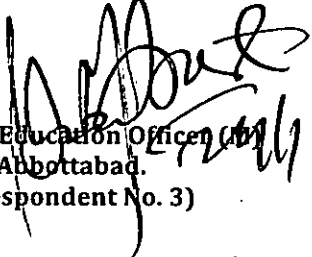
1. That the Para No. 1, of the service appeal relates to the service record.
2. That the Para No. 2, of the service appeal relates to academic record.
3. That the Para No. 3, relates to record.
4. That the Para No. 4, of the service appeal is correct as amendments regarding requisite qualification were made vide Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 as per Notification dated 30-01-2018 the requisite qualification for promotion is Bachelor Degree whereas, appellant do not fulfill the requisite qualification hence, instant appeal is against the policy and same may please be dismissed without any further proceedings. (Copy of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017, dated 30-01-2018 is annexed herewith as annexure "A").


Grounds:

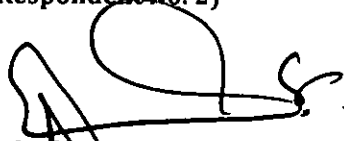
- a. That ground a, as composed is incorrect hence, denied. Impugned order dated 18-12-2019 is in accordance with the Law, Rules and Policy.
- b. That ground b, as composed is incorrect hence, denied. As replied in Para 4 of Factual Objections.
- c. That ground c, as composed is incorrect hence, denied. As replied above.
- d. That ground d, as composed is incorrect hence, denied.
- e. That ground e, as composed is incorrect hence, denied as appellant is not eligible for promotion due to non having the requisite qualification i.e. Bachelor.
- f. That ground f, as composed is incorrect hence, denied. As it is the sole prerogative of the Executive Authorities to frame policy are amend rules in accordance with the exigencies of service to cope up with the ever changing requirements and the cannot substitute its views in the decision of the government with regard to the policy matters.
- g. That ground g, as composed is incorrect hence, denied. As replied above.
- h. That ground h, as composed is incorrect hence, denied. As replied above.
- i. The respondents seek leave to raise additional grounds during the time of hearing.
- j. That ground j, as composed is incorrect hence, denied.
- k. That the respondents seek leave of this Honorable Tribunal to raise additional grounds at the time of arguments.

Under the circumstances, it is humbly prayed that the instant appeal is meritless against the law and facts, hence liable to be dismissed with cost.


Secretary (E&SED) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 1)


District Education Officer (M)
Abbottabad.
(Respondent No. 3)


Director (E&SE) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 2)


Sub Divisional Education Officer (M)
Lower Tanawal Abbottabad.
(Respondent No. 4)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.
Appeal No. 2232/2019

Imtiaz KhanAppellant

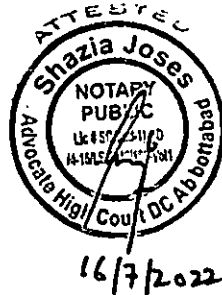
VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

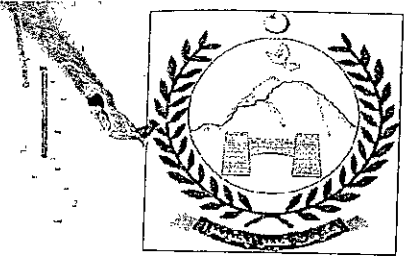
JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

AFFIDAVIT

I, Mr. Muhammad Shaukat, District Education Officer (M) Abbottabad, do hereby affirm and declare on oath that the contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.



[Handwritten Signature]
 DEPONENT
[Handwritten Date]



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

ANNEX "A" (5)

26

16/7
19-2-18

NOTIFICATION

Peshawar, dated the 30th January, 2018.

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017:- 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 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) against Serial No.1, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) At least Second Class Bachelor's Degree or four (4) years BS Degree in the relevant subject; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	21 to 35 years";

*Suppld /
ADOLE
or Complicance
is awarded*

(ii) against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis. (a) Chemistry, Botany or Zoology; or	19 to 35 years";

17/2/18

<p>(b) Physics, Maths or Statistics; or (c) Humanities and other equivalent groups at degree level with English as subject; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).</p>	
---	--

6
27

(iii) against Serial No. 10, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
<p>(i) At least Second Class Master's Degree in Arabic from a recognized University; or at least Second Class Bachelor's Degree from a recognized University with Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).</p>	<p>19 to 35 years";</p>

(iv) against Serial No. 11, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
<p>(i) At least Second Class Master's Degree in Islamiyat from a recognized University; or at least Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).</p>	<p>19 to 35 years";</p>

(v)

against Serial No. 13, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(vi)

against Serial No. 17, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(vii) against Serial No. 18, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(viii) against Serial No. 21, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years"; and

(IX)

against Serial No.22, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Qirat Sanad from registered Institution; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years".

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, 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 (E&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *A/Abad*
14. All District Accounts Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers/ Agency Accounts Officers in FATA.
16. PS to Governor Khyber Pakhtunkhwa. Peshawar.
17. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
19. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.

20.11.18
SECTION OFFICER (Primary)