19.08.2022 Due to cancelation of tour to Camp Court, Abbottabad, case is adjourned to 21.10.2022 for the same as before.

Réader

21.10.2022

Nemo for appellant.

Notice be issued to appellant/counsel for 26.12.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.

(Rozina Rehman) Member (J)

SCANNED KPST Peshawar

Form- A

FORM OF ORDER SHEET

se No -	202/2022	

	Case No	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/02/2022	The appeal of Mr. Saif-ur-Rehman presented today by Mr. Muhammad Tasleem Khan Kaloch Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order
	<u>.</u>	please. REGISTRAR
2-		This case is entrusted to touring S. Bench at A. Abad for preliminary hearing to be put there on
		CHAIRMAN
	er i	
	18.04.2022	Nemo for appellant.
		Notice be issued to appellant/counsel for 17.06.2022
	ι	for preliminary hearing before S.B at Camp Court,
		Abbottabad.
		(Rozina Rehman) Member(J) Camp Court, A/Abad
17.0	6.2022	Nemo for appellant.
-	appe	Despite directions, notice was not issued to lant/counsel. Therefore, fresh notice be issued to appellant and
,		ounsel for 19.08.2022 for preliminary hearing before S.B at Court, Abbottabad. (Rozina Rehman)
	,	Member (J) Camp Court, A/Abad

BEFORE KHYBER PKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CHECK LIST

Case Title: <u>Suifud Rehman</u> vs Govt of KPK

S.#	Contents	Yes	No
1.	This appeal has been presented by:		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	V	
3.	Whether Appeal is within time?	レ	
4.	Whether the enactment under which the appeal is filed mentioned?	ン	
5	Whether the enactment under which the appeal is filed is correct?	~	
6.	Whether affidavit is appended?	V	
7.	Whether affidavit is duly attested by competent oath commissioner?	~	
8	Whether appeal/annexures are properly paged?	~	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	~	
10	Whether annexures are legible?	~	
11.	Whether annexures are attested?	V	
12.	Whether copies of annexures are readable/clear?	1	
, 13.	Whether copy of appeal is delivered to A.G/D.A.G?	~	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	~	
15.	Whether numbers of referred cases given are correct?		
16.	Whether appeal contains cuttings/overwriting?		1
17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this Court?	1	
19.	Whether requisite number of spare copies attached?		
20.	Whether complete spare copy is filed in separate file cover?	レンシン	
21.	Whether addresses of parties given are complete?	1-	-
22.	Whether index filed?	~	
23.	Whether index is correct?	سا	
24	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:	·
Signature:	
Dated:	

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR Veel No. 202/2022 Saif-Ur-Rehman.

...Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary elementary Secondary Education, Peshawar others......Respondents

WRIT PETITION

INDEX

S#	Description of documents	Annexure	Page#
1.	Memo of Appeal	-	1-7
2. 3.	Affidavit		8
	Correct addresses of the parties	-	9
4.	Copy of appointment order	"A"	10-11
5.	Copy of promotion notification	"B"	10-11
6.	Copy alongwith better copy of notification	"C"	19-20
7.	Copies of reserved promotion to SST(G) quota and notification	"D", "E" & "F"	21-26
8.	Copy of ACR alongwith better copy	"G"	27-28
9.	Copy of educational record document	"H"	29-31
10.	Copy of the departmental appeal	"I"	32-33
11.	Copy of writ petition and order	"Ј"	34-42
12.	Wakalat Nama	-	43

Dated 10/02/2022

<u>22</u> Saif-Ur-Rehman

(Appellant)

Through: -

M. TASLEEM KHAN KALOCH

Advocate High Court, District Courts, (Mansehra)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. _____ of 2022

Versus

- 1) Government of Khyber Pakhtunkhwa through Secretary elementary & Secondary Education, Peshawar
- 2) Director Elementary & Secondary Education, Peshawar.
- 3) District Education Officer (Male) Kolai Pallas Kohistan

...Respondents

SERVICE APPEAL UNDER SECTION 4
OF KPK SERVICE TRIBUNAL ACT
1974, FOR A DECLARATION TO THE
EFFECT THAT WITHHOLDING THE
PROMOTION ORDER/NOTIFICATION
OF THE APPELLANT AGAINST THE
POST OF SST(G) BPS-16 EXECUTIVE
BY THE RESPONDENTS. DESPITE
HAVING FULLY SATISFIED THE
ELIGIBILITY CRITERIA IS ILLEGAL,
UNLAWFUL AND WITHOUT LAWFUL
AUTHORITY.

PRAYER: -

On acceptance of the instant appeal that this Honourable Service Tribunal may graciously be pleased



to issue direction to the respondents to promote the appellant against the post of SST(G) executive under the relevant rules, order, judgment or relief which this Honourable Service Tribunal deems fit and appropriate in the circumstances of the case, may also be issued/ passed.

Respectfully Sheweth!

1) That, the appellant was initially appointed against the post of Theology Teacher (TT) BPS-15 on 20.03.2015 in Education Department of the Government of Khyber Pakhtunkhwa Kohistan.

(Copy of the appointment order is annexed as Annexure "A").

That, due to meritorious services rendered by the appellant excellent high qualified record the appellant was promoted to the post of Senior Theology Teacher Male (STT) BPS-16 on dated 23.2.2021.

(Copy of the promotion notification is annexed as Annexure "B").

3) That, the respondents issued notification on dated 3 .12.2020 and promotion criteria for the post of SCTs and PSHTs male were

Promoted against their respective quota.

(Copy along with better copy of notification os annexed as Annexure "C")

4) That , in fact the approved criteria policy to promotion for SST(G) 25% initial recruitment quota is reserved and in district 10 vacant seats were reserved for SST (General), but respondent No.2 issued a notification on dated 16.04.2021 in which department granted 30% hence the appellant is discriminated.

(Copies of reserved promotion to SST (G) quota and notification are attached as Annexure "D", "E" & "F")

5) That , according to the existing policy 4% promotion quota to SST(G) is reserved for theology teacher and Senior Theology Teacher. Though the appellant is serving in this department for may years and having high Qualification among other TTS as shown in Tentative S. List of Promotion to SST (G)

(Copy of Tentative S. List along with better copy is annexed as Annexure "G")

6) That the appellant is high qualified having M. Phill. MA, B.Ed education and eligible in all respect for the

promotion in all respect for the promotion to SST(G) no other candidate available and post quota is vacant.

(Copy of educational record document is annexed as Annexure "H").

7) That, feeling aggrieved the appellant filed a departmental appeal to respondent No. 2 on dated 09.11.2020 but nothing came out of it.

(Copy of the departmental appeal is annexed as Annexure "I").

the Honourable Peshawar High Court Abbottabad Bench on dated 18.01.2022 from where the issue was taken into consideration and hold to approach the competent authority, hence this service appeal is being filed.

(Copy of the writ petition and order is annexed as Annexure "J").

That, feeling aggrieved and having no other remedy available the appellant approach this Honourable Tribunal *interalia*, on the following amongst other grounds: -

GROUNDS: -

A) That, the appellant is naturally born bonafide citizen of Pakistan and is fully and equally on equality basis entitled to all basic and



Hadra Britis

fundamental rights as enshrined in the fundamental laws of land interpreted, guaranteed and forced by the laws of land.

- B) That, as per rules only criteria as a postulated therein as the seniority cum fitness and not vice versa.
- C) That, the appellant is discriminated and is treated in violation of Article4, 25 and 27 of the Constitution of Islamic Republic of Pakistan.
- promoted to Senior Theology
 Teacher (STT) BPS-16 while
 appellant is entitled to Secondary
 School Teacher (SST) "G" BPS-16
 because having high qualification
 and fulfilled the criteria.
- F) That, according to policy and promotion as per approved criteria of the department promotion/appointment of SST "G" in initial recruitment is reserved 25% which means 2 and half seats but on dated 16.04.2021 the respondent No. 2 appointed three candidates hence filled 30% open quota.

F) In District there were 10 posts of SST (General) were vacant.

Government filling policy as under:
25% Quota of Initial Recruitment through NTS

75% Quota fixed for Departmental Promotion, for more clear given below table" -

Cader	Posts	Total vacant Posts 10	Remarks
Initial Recruitments	25%	2.5	3 person appointed
Departmental Promotion	75%	7.5%	
СТ	40%	04	4 persons Promoted
PST	20%	02	2 persons Promoted
DM04% AT04% TT4% Qari3% Respectively	15%	1.5	Post vacant

- G) Due to not availability of candidate of this Cadre (except appellant having 4%) 5% share granted to initial recruitments, they are given 30% instead of 25% they are appointed 3 persons and 9 posts are filled one post in vacant of this Cadre. 4% is appellant right being STT 6% vacant, no candidate, Appellant requesting to grant him 6% vacant share (6%+4%=10) (one seat).
- H) That, the appellant personally met with respondent No. 2 and was appreciated the matter because in the same cadre no civil servants were eligible for promotion of SST (G), respondent No. 2 remark the appellant that there are a one cadre servant, if no candidate like DM, AT, Qari the appellant may be



considered to SST and contact with respondent No. 3, but no response has been given by respondent No. 3 till today.

I) That, any other ground will be raised at the time of argument with the prior permission of this Honourable Service Tribunal.

It is, therefore, most humbly prayed and requested that on acceptance of the instant appeal that this Honourable Service Tribunal may graciously be pleased to accept the appeal and direct the respondents to promote the appellant against the post of SST(G) executive under the relevant rules or relief which this Honourable Service Tribunal deems fit and appropriate in the circumstances of the case, may also be issued/passed.

Dated 10/02/2022

Saif-Ur-Rehman

(Appellant)

Through: -

M. TASLEÉM KHAN KALOCH

Advocate High Court, District Courts, (Mansehra)

VERIFICATION/CERTIFICATE

I, SAIF-UR-REHMAN SON OF MOLVI MEHMOOD. SENIOR THEOLOGY TEACHER, POSTED AT GOVERNMENT HIGH SCHOOL KUZ SHARIAL PALLAS, DISTRICT KOLAI PALAS KOHISTAN DO HEREBY VERIFY/CERTIFY THAT THE CONTENTS OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE SERVICE TRIBUNAL.

SAIF-UR-REHMAN (DEPONENT)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Saif-Ur-Rehman.....Appellant

Versus

WRIT PETITION

AFFIDAVIT

I, SAIF-UR-REHMAN SON OF MOLVI MEHMOOD. SENIOR THEOLOGY TEACHER, POSTED AT GOVERNMENT HIGH SCHOOL KUZ SHARIAL PALLAS, DISTRICT KOLAI PALAS KOHISTAN DO HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT NO SUCH SUBJECT MATTER WRIT PETITION HAS EVER BEEN FILED NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE SERVICE TRIBUNAL.

SAIF-UR-REHMAN (DEPONENT)

IDENTID#FED BY: -

M. TASLEEM KHAN KALOCH ADVOCATE HIGH COURT, DISTRICT COURTS, MANSEHRA

9

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Saif-Ur-Rehman.....Appellant

Versus

WRIT PETITION

CORRECT ADDRESSES OF THE PARTIES

Respectfully Sheweth!

Correct addresses of the parties are as under: -

PETITIONER

Saif-Ur-Rehman son of Molvi Mehmood. Senior Theology Teacher, Posted at Government High School Kuz Sharial Pallas, District Kolai Palas Kohistan

RESPONDENTS

- 1) Government of Khyber Pakhtunkhwa through Secretary elementary & Secondary Education, Civil Secretariat Peshawar
- **2)** Director Elementary & Secondary Education, GT Road Hashtnagri Peshawar.
- **3)** District Education Officer (Male)) Kolai Pallas Kohistan at Sair Ghazi Abad

Dated 10/02/2022

Saif-Ur-Rehman

(Appellant)

Through: -

M. TASLEEM KHAN KALOCH

Advocate High Court, District Courts, (Mansehra)



Office of the District Education Officer (Male) Kohistan



ACCOINTMENT

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of Theology Teacher in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on school base, adhoe base and on Contract under the existing policy of the Provincial Governments of Khybar PakhtunKhwa, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over

Sr.	Name	Father Name	Score	Name of School ,
3	Mulammad Younas Liagat Ali Karimullah Noor ul Islam	Pir Dad Hejab Muhammad Hamza	103.28 97.73 94.14	GMS Basha GMS Shemal Guli Pattan GMS Qala Kolai
5	Lai Sher	Naimattullah Muhammad Seraj	93.66 93.21	GMS Kukam Abad GMS Sazin
	Saif ur Raitman	Molvi Melmood	93.06	GMS Gulab Abad

TERMS & CONDITIONS.

t. No TA/DA is allowed.

Charge reports should be submitted to all concerned in duplicate.

2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of ago. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the Certificate/documents must be verified from the concerned authorities, If found producing bogus Certificate/Documents will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's notice from either side. Incase of resignation without notice his one-month pay/allowances shall be

Incase of resignation without notice his one-month pay/ allowances shall be forefeited to the Government.

Pay will not be drawn until and unless a certificates/ Documents are verified.

of He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this appointment order, his appointment will expire automatically and no subsequent appeal etc shall be entertained.

9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.

19. He will be governed by such rules and regulations as may be issued from time to

11. His services shall be terminated at any time, in case his performance is found misalisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed from time to time.

12. His appointment is made on School based, he will have to serve at the place of posting, and His service are not transferable to any other station.

13. Drawing and dishursing Officer are directed that Before handing over charge once again their documents may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

> District Education Officer (Male) Kohistan

Budst: No. <u>23</u>11-13 /DEO (M) KH, Dated: : 2.0 Copy forwarded for information and necessary action to the:

t. District Accounts Officer Kohistan.

1. District Accounts Officer Kohistan.
2. PS to the Secretary to Gout: Khyber Pakhtunkhwa E&SF Department.
3. PA to the Director E&SE Khyber Pakhtunkhwa. Feshawar.
4. PA to Deputy Commissioner Kohistan.
5. Deputy District Education Officer (M) Kohistan.

6.Heed Masters/Incharge concerned schools.

z. Feachers concerned.

3.Locui Office.

District Education Officer (Male) Kohistan

Better Coly W-A

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) KOHISTAN

NOTIFICATION

Consequent upon recommendation of the district Selection Committee, appointment of the following candidates are hereby ordered against the post of Theology Teacher in BPS 15(Rs 8500.700.29500) fixed plus usual allowances as admissible under the rules on school base, adhoc base and an contract under the existing policy of the Provencial government of Khyber Pakhtunkhwa, in teacher cader on the terms and conditions given below with effect

Hom the date of their t	aking over charge.		01100	
S NAME	Father name	Score	Name of school	
1 Muhammad Younas	Pir Dad	108.28		
² Liagat Ali	Hejab	97.71	GMS Shamal Gali Pattan	
3 Karimullah	Muhammad Hamza	94.14	GMS Qala Koli	
4 Noorul islam	Nimatullah	93.66	GMS Hukum abad	
5 Lal Sher	Muhammad Siraj	93.21	GMS Sazin	
6 Sai fur Rehman	Molvi Mehmood	93.06	GMS Gulab abad	

Terms and conditions:

- 1. No TA/DA is allowed.
- 2. Charge report should be submitted to all concerned in udblicate

3. Appiontment is purely on temporary and contract basis initially for one year,

4.he should not be handed over charge if he exceeds 35 year s or below 18 year of age age relaxtion case may be submitted to comptent authority.

5. Appiontment is subject to the condition that the certificate /documents must be verified from the concern authorities, if found producing bogus certificate Documents will be reported to the law enforcing agencies for

6.his service are lible to termination on one month,s notice from either side, in case of resignation without notice his one months pay / allowances shall be forefeited to the government.

7. pay will not be drawn until and unless a certificate documents are verified.

8.he shuld join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of issuance of this appointment order his appointment will expire automatically and no subsequent appeal etc shall be entertained.

9. Health and age certificate should be produced from the medical superintendent concerned before taking over

10 He will be governed by such ruls and regulations as may be issued from time to time by the government.

11. His service shall be terminated at any time, in case his performace is found unsatisfactory during his contract period, in case of mis conduct, he shall be preceded under the rules framed from time to time.

His appointment is made on school based . he will have to seve at the place of posting , and his service are not transferable to any other station.

13.Drawing and disbursing officer are directed that before handuing over charge once again their documents may be cheacked if they have not the require relevant qualification as per rule they may not be handed over charge of the post

> ENGLISH SIGNURE OF DISTRICT EDUCATION OFFICER

Male Kohistan

Endtt: No 2311.18e DEO (M)KH, Dated 20/03/2015



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar AMMEXWE (B)

nsequent upon the recommendation of the Departmental Promotion Committee and in overnment of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/10-22(E) 2010 dated 16.7.2012, the following CT,DM,AT,TT and PET (Male) are promoted to the posts of Senior CT, Senior DM, Senior AT and Senior PET in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect, and further they will be adjusted by the District Education Officer concerned.

Officer concerned.

ITEM No.1 PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT BPS-16 ON REGULAR BASIS

TIEM NO.1 PROMOTION OF CT (DIS-13) MADE 10	50
Total No. of Sanctioned Post of CT	39
1/3 rd Share of SCT Posts	20
Share of Promotion Quota of SCT	100%
Already Promoted to SCT	09
Posts Available for Promotion to SCT	11
Proposed CT for Promotion to SCT	

SĦ	5n #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Services are placed at the disposal of DEO
1	1	Riaz Ahmad	GMS Mada Khail Abad	03/10/1987	20/03/2015	MA M.Ed	(M) Kolai Pallas Kohistan for futth adjustment against the post of SCT in BP. 16 on regular basis with immediate effect. Services are placed at the disposal of DE (M) Kolai Pallas Kohistan for furth adjustment against the post of SCT in BP. 16 on regular basis with immediate effect.
2	2	Muhammad Haq	GMS Mahreen Kolai	15/08/1988	09/03/2016	MA M.Ed	
3	3	Abdullah	GMS Shalkhan Abad	15/06/1991	09/03/2016	BSc,CT	Services are placed at the disposal of DEO (M) Kolai Pailas Kohistan for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect.

ITEM No.2 PROMOTION OF DM (BPS-15) MALE TO THE POST OF SDM (BPS-16) ON REGULAR BASIS

Total No. of Sanctioned Post of DM	28		
1/3rd Share of SDM Posts	9		
Share of Promotion Quota of SDM	100%		
Already Promoted to SDM	8		
Posts Available for Promotion to SDM	01		
Proposed DM for Promotion to SDM	01		

S#	5n #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular DM	Qual:	Remarks
1	6	Fazal Raheen	GMS Seer Bar Palas	04/07/1975	31/12/2010	BA,DM	Services are placed at the disposal of DEC (M) Kolai Pallas Kohistan for further adjustment against the post of SDM in BPS 16 on regular basis with immediate effect.

ITEM No.3 PROMOTION OF AT (BPS-15) MALE TO THE POST OF SAT (BPS-16) ON REGULAR BASIS

28	
9	
100%	
04	
05	
03	
	28 9 100% 04 05 03

5#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular AT	Qual:	Remarks
1	5	Nosherawan	GMS Mada Khel Abad	01/01/1985	09/03/2016	MA, S.Alamia	Services are placed at the disposal of DU (M) Kolai Pallas Kohistan for furth adjustment against the post of SAT in BPS-on regular basis with immediate effect.

Attested 10-03-2022 How

		I to the second		13/ 11	omotion of !	Senior Tea	chers of District Kolai Pallas Kollistan
}	ó	Inayat Ur - Reliman -	GMS Malireen Kolai	01/12/1996	09/03/2016	MA,	Services are placed at the disposal of DLO (M) Kolar Pallas, Kohistan, for further adjustment against the post of SAT in BPS-36 on regular basis with immediate effect.
1.1	14	Ghulam Ullah	GMS Jan Bela	05/11/1987	20/03/2015	MA, S.Alamia	Services are placed at the disposal of 1mO ₂ (M) Kolai Pallas Kohistan for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect.

TTEM No.3 PROMOTION OF TT (BPS-15) MALE TO THE POST OF STT (BPS-16) ON REGULAR BASIS

	the state of the s
Total No. of Sanctioned Post of TT	26
i 1/3 rd Share of STT Pasts	9
Share of Promotion Quota of STT	100%
Already Promoted to STT	5
Posts Available for Promotion to STT	01
Proposed TT for Promotion to STT	02

5#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular TT	Qual;	Remarks
1	7	Saif ur Rehman A	GMS Bar Sherial	20/05/1989	20/03/2015	MA, S.Almia	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of STT in BPS-16 on regular basis with immediate effect. Services are placed at the disposal of DEO (Services are placed at the disposal of DEO)
2	8	Noor ul	GMS Hukam Abad	01/01/1981	20/03/2015	BA, S.Almia	Services are placed at the disposition of further (M) Kolai Pallas Kohistan for further adjustment against the post of STT in BPS-16 on regular basis with immediate effect.

ITEM No.4 PROMOTION OF PET (BPS-15) MALE TO THE POST OF SPET (BPS-16) ON REGULAR BASIS

TIENTINO.4 TRUMOTION OF TELLORS TO	78
Total No.of Sanctioned Post of PET	
1/3 rd Share of SPET Posts	100%
Share of Promotion Quota of SPET	6
Already Promoted to SPET	03
Posts Available for Promotion to SPET	03
Proposed PET for Promotion to SPET	

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Appti: as Regular PET	Qual:	Remarks
1	2	Saif ul Amir	GMS Dil kandow	06/01/1971	01/,10/2009	BSC, PET	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SPET in BPS-16 on regular basis with immediate effect.
2	3	Muhammad Sharif	GMS Bar Sherial	04/04/1976	05/05/2003	BSC, PET	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SPET in BPS-16 on regular basis with immediate effect.
3	4	Mufti	GMS Bazní	06/01/1983	23/05/2014	BA, PET	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SPET in BPS-16 on regular basis with immediate effect.

Terms and Conditions:-

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

Affested 10-03-2022 As V Promotion of Senior Teachers of District Kolai Pallas Pallas Kolai Pallas Pall

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Endst: No.5259-65 / File No.6/Promotion Senior Teachers (BPS-16) Dated Peshawar the. 29/09/2021

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar

2. District Education Officer (M) Kolai Pallas Kohistan

3. District Accounts Officer Kolai Pallas Kohistan

4. Officials Concerned

5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department

6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar

7. M/File

Deputy Director (Estab) Elementary and Secondary Educ Khyber Pakhtunkhwa Peshdu

Affested 10,902-2022



For condain Education Visiber Politicalism of Director Series near than Secondain Education Visiber Politicalism heat the series is individual to the series of the series

Wen No. VPROMOTION OF GI (875-16) MALE TO FRED TO THE

1 37 Mone of Section	Designation	Name of Pleased School	. Magrapa and Legacity of the	अक्टूबर्स इ.स.स.च्या	of chi
Riez Ahmad	'ATT 4 TO DIG. 3 10 h Ave 1	GMS Madelshall Altes			
े विकासमान्य हिन्स	CT (BPS-15) to SCI (SPS-14)	iska Mohroen Kolo:	Commence of the second of the		5 (2)
1 3 Abstracts	CT (875-16) to SCT (875-14)	OMAS Stratistics Alond	CARRENTE FOR	rawan nagara	Service Service

Stem No.2: PROMOTION OF BM ISPS-15) MARE TO STATOR DM (175-15)

2 3 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Halling of fageher.	;	Designation		Rems of f	នៃមនុស្ស អ៊ុ			al Forty disch	1423	12	
1	Faigl Boheem		DM (8FS-15) to SDM (3FS-16)	į	GS93 Snor!	Son Enile	15	GHSS	lácidan Polol	;	₫4	F. 3
,			ិទ្ធសាស (គ្រីស្វែង - រស [ូ])				bermanen -	T says rem				***

ittem No 3: PROMOTION OF AT (SPS-15) MALE TO SENIOR AT (BES-16)

\$ð	Home of Jeocher	Cesignation	House of Present School	Name of Poster Scient	S. G. Arram R
	्रिक्तिक्षेत्रकार्यक्ष 	AT (873-18) H	138/s Madathall Abod	. GHS Roy Mundal	1.15
3	laggat lii Rohman	artimor (a) dr.	GAS Mainten Kolol	GHS Share Feder	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
3	Ghalam Glah	AT (675-15) 10 5A1 (875-16)	GWS Jun Belo	CHAS Balteira	(A, V.)

Chem No. 41 PROMOTION OF IT (BES-18) MALE VERY RECEIVED AND AND

-	SE Destro et localists	Designation	_ korgo of fresign isola		The same of the sa	1 0.00 <u>1</u>
	1 March 1986	TOTAL A MARCHAN CO. AND CO. AND CO.				
	and the state of the state of the same and the	77 (886-15) in	্ৰেটে ইন্ট্ৰা টান্তা হো	11.812		ſ
:	ी ्रेट्सिकि विश्वीतम्बद्धव	班(原5-14)	The second of th			"

PAREFFI

Affested 10-p2-2022

													177 - 10 4 11		
		Transfer and a					and the			9 9 29			10/2.7		
	100 to 50 to					4.7			*	The second					2.44
	4 6		the France						this .	**		7 1 2 2	The second of the second		
		正正规 "好你可能的。"	10 mm		Terretain			The second second			The same of the same		7.5		
	a made	The safe of the safe		(2010) · · ·	N-100	- No. of Supplement to the second				The second second		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	计 42 设施 一下。《		1
			227	11 - 1 - 2	74	2	at managers and there	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				a file that a stage, my			
	1 1			1 E	Pelg	CIPI, MY COLORS				21 1 1 1			The State		
		i ace di			Address of the same of	100.00			The state of the state of			1988 Table 1			
		P ARTICLES .	11 March 201	7	A			and the second of the		and the same of the same of					
		the restrict of the second	4 6 7 7 7 7		PF (Si	7.5			T 67 39 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	**************************************		and the second	4-1		
-			100	1	ラ シン えびば	1. 1.20 . 2						A company of the same of the			
13		Company of the control of	e in the second		, in the second	たべ チェン・カー	·		The same of the sa		10 A 1 1 2 1 1 2	- 54 - 10 x 2 x 1	and the second	Anna bears	
					ESC. D.C.		2 6	アイルニシャー マングラー		The second of		45 4 4	Marine Street	1144	
	10.51.7			- í i	. T. F	TOTAL SECTION .		No to the			· · · · · · · · · · · · · · · · · · ·		transfer of the property	77	
3.1		MACOS 15			er per		4	i du go-	E and the control	٠, *		arte .		97.1	化物产剂的复数
7	70 70 8	t Andrews				Fire Charles Ship		*** 14 4 4 4 4 4	75 16 4 16 4 11						
. "		7.2 (1.55.1.4)			*** 30 ac				. A						
					Could be a window	N		The second second			and I have a	491	4.4		
ο.									_		-16.46.4		7	4 .	
	والمستنفسة والمسترا	-			PAT (DP)			the Park State of the Control		- : :			al traction	4 .	100
		The second second									P familiary				
			and the same of the same of the	* * * 1.3 3	5 5 J. W. 17 C. c	34.44.4	1 . F 3 B . n	de to the		*.	harm shall, and the manife	with the same of			Country to
•			and the same of th		50% FEF 6	松彦安 ラン	· 2004/8/3	F. Michigalia							
•			and the same of	- L	500. P. EV (的声音-1人	. / APRIS	the British (er e ega sa sa sa sa	
•			The second secon	·	an Pers	的产5-1人		t Belgio				erengen in den er			
•			The second secon	1.	an. Perg	跨5-14	n Salania Parataman	发生的				erteren er en er Angeløyette i '	* (
•			The section of the se		in per	数5-14	n distribution	\$ 是 达 的自				地域农民	·		in and and a
,			Andrew Co. Stanford Co.	1.3	ad. Per j	的第5-12	a Salan	t Bank	ire of best ming			地区交出			
			Andrew and a planting of	1.	ad. Per	BF5-12		t Bearing	ter of the same and the same			地数深山			
			and the second s		in Peri	B#5-14	n Silateria	S Hearth	in the same of the			地域深兴			

Note: Att. Sher Alzal FET BPS-15 working against BPS-16 of GPSS had okal in tweeton to perform his duties in GMS Board against the yelcont post of PET (PET-TH)

Tems configurations

- i. They would be an probation for a period of one year extendable for religious care
- a they will be governed by such rules and requisitors as may be istued for a limb to
- d. Their services can be isminated at any line, in case their posit property is fortyconsideriory during probationary period. In case of adscenduct, they shot be Drockeded under the rules homed from time to fires,
- A. Charge report should be submitted to all concerns i.
- a. Anoth inter-Se-seniority on lower post will remain latant.
- E. No TAYDA ir **allowe**d.
- 7. They will give an under taking to be recorded in their terrice books to the effect that If any ever payment is made to been in light of this contact will be reported to they are wrongly premoted they will be reversed.
- S. Before handing over charge, their documents may be cheaten. If her have and for required relevent qualification as overview, they may not be basided eventure attenue.
- 9. All DDOs of Higher Secondary shigh Schools are disected to check/vedition their SA degree and professional degrae before drawl of their pay if any comessions made later on all DDOs will be held responsible

 $m_{i}(\mathbf{g}_{i}) = (m_{i}(\mathbf{g}_{i}) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i}) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i}) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i}) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i}) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i})) + (m_{i}(\mathbf{g}_{i}) + (m_{i}(\mathbf{g}_{i}))) +$ gand dissip Disidol Education Officer (Marie) Koja čelos dekala

G. N. M. C. T. L. L. . Arthough the word purpost Promotions (44 Km. Object. 11)

Capy of the above is forwarded to the: Deputy Commissioner Koloi Fallas Kohistan District Accounts Officer Kohiston KP Denniv District Education (Wear (M) ES Kabidan

AffeSfeel 10,402-2022 Agras

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) KOLAI PALLAS KOHISTAN

NOTIFICATION

In compliance with thenotification of Director Elementary and Secondary Education Khyber Pakhtunkhawa vide notification issued under endstt no no 5259.65. /FileNo 6/Promotion senior teacher /(BPS/16)Dated Peshawer The 29.10.2021 The following CT, DM AT.TT and PET in BPS 15 male promoted to the post of Senior CT, Senior DM, Senior AT, Senior TT and Senior PET in BPS 16 RS 18910.1520.64510plus usual allowance as admissible under the rules on regular basis under the existing policy of the provincial government. on the terms and conditions given below are hereby posted in the schools noted against their names in the best interest of public service with effect from the

ITEM No 01 :PROMOTION OF CTBPS 15 T

S NAME	DESIGNATION	Name of present school	O SENIOR CT BI	PS 16
1 Riaz ahmad		,	Name of posted school	remarks
	SCT RPS 16	GMS madakhil abad	Gms jaba	A.V.P
2 Muhammad	Ct BPS 15 to	GMs mahreen	madakhil	
Haq 3 Abdullah	SCT BPS 16	kolai	GHSS Battira	A.V. P
	Ct BPS 15 to SCT BPS 16	GMs shalkhan	GHS kuz paro	A.V.P
ITEM No 02	DECAMONIC	abad		

ITEM No 02 :PROMOTION OF DM BPS 15 TO SENIOR

S NAME	DESIGNATION	Name of	O SENIOR DM B	PS 16
I Fazal ur		Lightle of breseut school	Name of posted school	remarks
rehman	DM BPS 15 to S DM BPS 16	GMS Seer	GHSS Maidan	A.V.P
	2 DROMOTION	ber palas	kolai	24. 7. 1

ITEM No 03 :PROMOTION OFAT BPS 15 TO SENIOR AT BPS 16

S NAME	DESIGNATION	Name of present school	O SENIOR AT BP	S 16
1 Nosherwan	AT BPS 15 to SAT BPS 16	GMS madakhial	Name of posted school GhS kuz sheryal	remarks A.V. P
2 Inayat ur rehman 3 ghulamulla	AT BPS 15 to SAT BPS 16	GMS Mahreen koli	GHS Kharo gadar	A.V. P
<u>h</u>	AT BPS 15 to SAT BPS 16		GHSS Battira	A.V. P

ITEM No04 :PROMOTION OF TT BPS 15 TO SENIOR TT BPS 16

S NAME	DESIGNATION	Name of present school	SENIOR TT BPS 16	-l- <u>-</u> -
1 Saifur	TT BPS 15 to S	 	Name of posted school	remarks
Rehman	TT BPS 15 to S	GMS Basr	GhS kuz sheryal	A.V.P
² Noorul	TTDDC	shrial GMS Hukum		
islam	TT BPS 16	abad	GHSS Battira	A.V.P
				}

Attestat 10-92-2022 Again 19-10 DOL DO

Beffer GPY (B) A

ITEM No05:PROMOTION OF PET BPS 15 TO SENIOR PET BPS 16

S NAME	DESIGNATION	Name of present school	Name of posted school	
1 Saif ul amin	S PET BPS 16	GMS dil kandow	GHSS Madan kolai	A.V. P
2 Mufti	PET BPS 15 to S PET BPS 16	GMS Bazni	GHSS Badakot	A.V. P

Terms and conditions:

- 1. They would be on probation for a period of one year extendable for another one year
- 2. They will be governed by such rule and regulations as may be issud from tieme to time by the government.
- 3.their service can be terminated at any time. in case their performance is found unsatisfactory during probationary period, in case of miscoundact they shall be proseededunder the rule farmed from time to time.
- 4. Charge reports should be submitted to all concerned
- 5. their inter Se seniority an lower post will remain intact
- 6. No TA/DA is allowed.
- 7. Thhey will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in light of this order will be recovered and if they are wrongly promoted they will be reversed.
- 8. Before hnading over charge their docoments may be checked. if they have not the require relevant qua lification as per rules, they may not be handed ver charge of the post
- 9.All DDOs of higher secondry schools High schools are directed to checke/ verified their Ba degree and frofessiional degree before drawal of their pay if any consequence made later on all DDOs will be held responsible

ENGLISH SIGNURE OF

ZAHID HUSSAIN

DISTRICT EDUCATION OFFICER
Male Kolai Palas Kohistan

Endtt: No 10856-64/File .100Vol. DEO (M)Estt: Promotion M Dated 23/11/2021

Affested 10-102-2022 Azin







DISTRICT EDUCATION OFFICER OLAI PALLAS KOHISTAN

tropa georegistjerbeggestjesti

HOTHCATION

OFFICE

In compliance with the order of Director Bementary and Secondary Education Sayber Pakhtenishwa Peshawar vide Roldication issued under Na.2975-80/Ale Na.1/Promption SSI (BPS-LS) Dated Peshawar the 08.12.2020. The following SCI: and FSHIs [Mole] promoted to the post of \$51 (General) in 8P5-16 (Rs,18910-1520-645(0) plus usual attowance as admissible under the rules on regular basis, under the existing, policy of the provincial Covernment on the torms and conditions given below are hereby posted in the Schools appears the Names in the best interest of public service with immediate.

A. Promotion to \$\$T [General] ን/ሃልጅ ይል ዘሁናንቱው ነብሮኒ ልተ. ተመ

TIEM No.1 PROMOTION OF SCI (Male) TO THE POST OF 55	(G) BF5-16 ON REGULAR BASIS
Total No. of Vacani Post of SST [G]	10
25 % Initial Recruitment of 55T IG)	2.5
75 % Promotion Quoto of SSF (G)	7.50
40 % SC1/C1 Quota to 551 (G)	04
Posts available for Promotion to SST [G]	D3
Proposed SCI for promotion to SST (G)	D3

5.#	Name of Official	Name of Present School	Date of Birth	Date of 1" App: #5 Regular CT	Qualification	Name of Adjusted School	Hemarks
01	Amonullah	GHS Shorakel	03-02-1979	05-12-2014	MA/M.ED	GMS Dat Sharaket	AVF
០១	Muhaeimad Akbar	GHS Shareket	12-03-1977	05-12-2014	MA/M.ED	GHS Shorokol	AVF
03	Shamsi Khas	GH55 ពីចម៉ាងវិយ	D1-05-197W	30-07-2015	MAJALED	GMS Jan Eela Madakhall	A.VP
GA	Nawab Khen	GHS Fara Gáthi	10-04-1978	30-07-2015	MA/M,ED	GHS Pere Gerhi	AVF

PROMOTION OF FINE (BPS-15) Mole TO THE POST OF SET (G) DES-TE ON REGULAR BASIS ITEM No.2.

Total No. of Vacant Post of SST (G)	74	10
25% Initial Recruitment of SST (G)	1	2.5
75% Promotion Quota of SST (G)	77	7.50
20 % PSHT/SPST/PST Quote to SST (G)		02
Posts available for Framation to SST (G)) and the second	02
Proposed PSHI for promotion to SST (G) / / /		62

5 11	Name of Official	Name of Present School	Date of Dieth	Date of 1st App: as Regular PST	Qualification	Name of Adjusted School	Remarks
131 	Amalı Khan	Gri tan Landa	07.01.1773	25-12-1993	0.3,0,ED	GMS Ser Sheriel	λ\/ 1
oz :	ಕಿರಿಡರ್ ಕೆಂಗಿಗಳಿಗಾ	GFS Shors Jornal	03-09-1974	01-12-1976	#A/8.50	GH5 Khara Gadar	AVF

Teims and condillons:

They would be an probation by a parted of one year extendable for another one year.

2. They will be presented by such reless on dissociations as may be issued from that to time by the AHESTES 10-07-2022



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOLAI PALLAS KOHISTAN

NOTIFICATION

In compliance with the order of Director Elementary and Secondary Education Khyber Pakhtunkhawa Peshawer vide notification issued underNO .2975.80/FileNo.1/ Promotion SST (BPS.16) Dated Peshawer the 08.12.2020. The following SCTs and PSHTs Male promoted to the post of SST Genral In BPS 16(RS ,18910.1520.6451) plus usual allowance as admissible under the rule on rugular basis under the existing policy of the provincial government on the terms and conditions given below are hereby posted in the schools noted against their names in the best interest of public service with immediate.

A.Pomotion to SST (General)

ITEM NO .1 PROMOTION OF SCT MALE TO THE POST OF SST G BPS ON REGULAR BASIS

T . I I I	
Total No of Vacant post of SST(G)	10
25% Initial Recruitment of SST(G)	2.5
75%Promotion Quota of SST(G)	7.50
40% SCT /CT Quota to SST(G)	04
Posts available for Promotion to SST(G)	04
Proposed SCT for promotion to SST(G)	
	04

; '/ 	Name of official	Name of Present School	Date of brith	Date of first App as Regular CT	Qualification	Name of adjusted school	Remarks
01	Amanullah	GHS Sharakot	03.02.1979	05.12.2014	MA/M,ED	GMS Dat SHARAKOT	AVP
02	Muhammad Akbar	GHHS Sharakot	12,03,1977	05.12.2014	MA/M,ED	GHS SHARAKOT	AVP
03	Shamsi Khan	GHSS Battaira	01.05.1974	30.07.2015	MA/M,ED	GMS JAN BELA Madakhial	AVP
04	Nawab khan	GHS Para Ghari	10.04.1978	30.07.2015	MA/M,ED	GHS Para Ghrhi	AVP

ITEM NO .2 PROMOTION OF PSHT MALE TO THE POST OF SST G BPS ON REGULAR BASIS

Total No of Vacant post of SST(G)	10
25% Initial Recruitment of SST(G)	2.5
75%Promotion Quota of SST(G)	7.50
40% PSHT /SPST/PST Quota to SST(G)	02
Posts availiable for Promotion to SST(G)	02
Proposed PSHT for promotion to SST(G)	02

i 7 —	Name of official	Name of Present School	Date of brith	Date of first App as Regular CT	Qualificatio n	Name of adjusted school	Remarks
1	Amaiz khan	GPS Bar banda	07.01.1973	25.12.1993	BA/BED	GMS BAR sherval	AVP '
2	Abdur rehman	GPS Shum Jumat	03.09.1 974	01.12.1 994		GHS Kharo Gadar	AVP

Terms and condition:

They would be an probation for a period of one year exlendable for another one year. They will be governed by such ruls and regulations as may be issued time to time by the government.

10-02-022 10-02-022



Directorate of Khyber

ary and Secondary Education tunkhwa Peshawar AMMELUKE (D)

Consequent upon the arrangement braining No. INTERMEDIA 20, and the recommendation the Physical Selection Committee, the following conditions are appointed to the post of \$51 (G) Male in 1978 to the the title of the 1804 to the first placement allowances as admissible under the rules on allow contract have under the example patter of the Provincial Consentrees, in Teaching Cadre on the terms and earth no 10 20 given below with immediate either.

 $\Pi L \underline{M} N Q_A$ APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE (BPS-16) ON AUHOC RASIS UNDER 25% OPEN QUOTA

No.	Red Na	NATURE	Laster Name	OOB	ENC	Nts Viele	trad Marks	Trul	School Place of Data
•		Bay Compa	The first section		i fable dajevet is	* *	£7.12	122 12	Server at Partie de Lesses at Dag Asia Nota Para Action
<u>.</u>		A STATE OF THE PARTY OF THE PAR		33.4.64	11-81 	ž.N	7, 43	117 #3	Serve repaired 12 seed of Decrete Role Plants had also
;	10 + 1 = 15 F	S. S. Con.	Manager Light Mark	13-4 13-43	1252 14434 14434 1544 1544 1544 1544 1544 15	Marketon : :	ಕಟ್ಟಿತ	122.35	Services are placed at the dependent of DEO (M). Kola, Palm Konstant

Terms and Conditions:-

- The DETEN directed to adjustipost the appointers against the achools posts already advertised on the web-site of
- เรื่องได้เกียง allenes
- 3. Charge reports thould be submitted to 30 temperand in duplicate.
- Apple himself is purely on temporary & contract basis indially for one year with immediate effect
- They should not be handed ever thorge if they exceed 35 years of below 19 years of age. Age relaxation ease may たからにない さられる ちゅうかと Carring 15日で あいたかなれない
- of any mentonious cand date is deprived of appointment by this order, and the Competent Authority accepts his appear, the appearament order of the law moral candidate will be with drawn, and the adjustment pider will be chickness according to the ment
- Appearance is subject to the execution that the conficultation/documents must be ventiled from the concerned authorities to the DEO (concerned), anyone found producing books certificate will be reported to the fan enforcing agencies for further ast the and his appointment order shall be denotified from the date of its ossuance
- 8. Their services are l'able to termination on one month's notice from either side. In case of leasing the department without notice their one month pay/allowantes than be forfested to the Government
- 9. Fay as first be drawn until and unless a certificate to the effect by DEO(concerned) to the effect that their cert licates are venified and found correct and genuine
- 10 They should you they past within 30 days of the insuance of this notification. In case of fadure to join the post within 30 days, their appointment will expire automatically and no subtriquent appeal shall be interrained
- II Health and Age certificate should be produced from the Medical Superintendent concerned before taking over C 2 T
- 12. Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period, or will be extended for another year if found satisfactory,
- 23. The appointment is made on school based. They will have to serve at the place of pointing, and their services are natiteansferable to any einer station
- 14 Before handing over charge, once again their documents may be checked by the Headmaster/Frincipal (Concerned) and if they have not acquired the relevant qualifications as per rules, they may not be handed ever the charge of the post, and the case may be reported to the Birectorate, ESSE, for with drawl of order
- 15. The 2000 ntees shall take nine (09) months mandatory training at RITE Or PITE
- 16 The DEO concerned is directed to verify the domeste namely, Jan Muhammad, at 5 No 3, in Item too 1 of the appointment of SST(G), of this order, from Deputy Commissioner concerned for its intaction, in ease the domicie found take, unsenfied or not intact, his appointment order with tand cancelled automatically

(Hafix Dr. Muhammad Ibrahim) Director

Hermitians and Secondary Education

Abiber Pakhhadhad Peshadar Ender No 2579-86 (Rie Nog Asia NST, Adbox Apper 1818 in 1 Detail Perbasar the 16, 4 2021 Copy forwarded for information and necessary action to the ... Accommoding General Abythin Published than the departs

H+5400 10-03-2-22 15=10



BETTER COPY

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWER.

NOTIFICATION

Consequent upon the advertisemet bearing no INF(P)19/20and the recommendation the Departmental selection Committee, the following candidates are appointed to the post of SST GMaleBPS 16 (Rs 1510.1520.64510)1510 fix plus ualaallwance and admissible under the rules on adhoccantract basis under the exitaind policy of the provincial government in teaching cader on the terms and condition giveb bellow with immediate effect

ITEM NOI, APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE

S	ROLL NO	NAME	FATHER NAME	DOB	CNIC .	Nts marks	Açad mark	Total score	School place of disty
1	1540 0200	Aziz ulhaq	Fuqra	10.02.1 994 ,	13402.4436 997.9	61	67.1 2	128. 12	Services are palced at the desposal of DEO Male kolyPalas Kohlstan
2	2350 0548	Hafiz fazalhaqhaq ani	Muhammad zurrar	05.05.1 986	13402.9415 627.1	56	71.4	127. 43	Services are palced at the desposal of DEO Male kolyPalas Kohistan
3	1240 0469	Jan Muhammad	Muhammad zareen khan	15.01.1 996	13202.1999 809.3	62	60.3 6	122. 36	Services are palced at the desposal of DEO Male kolyPalas Kohistan

Terms and conditions:

- 1. The DEO is directed to to adjust /post the appointees against the posts already advertised on the web site of the NTS.
- 2.No TA/ DA is allowed.
- 3. Charge reports should be submitted to all concerned in duplicate.
- 4. Appointment is purely temporary and contract basis initially for one year with immediate effect 5. They should not be handed over charge if they exceed 35 year or below 19 years of age. Age relaxation case may be submitted to the Competent Authority.
- 6.If any meritorious candidate is deprived by this order, and the Competent Authority accepts his appeal the appointment order will be reviewed according to the merit.
- 7. Appointment is subject to the condition that the certificates/ documents must be verified from the concerned authorities by the DEO(concerned) any one found producing bogus certificate—will be reported to the law enforcing agencies for further action and his appointment—shall be denotified from the date of issuance,
- 8. Their service are able to termination on one months notice from either side, in case leaving the department without notice their one month pay/ allowances shall be posted to the government
- 9. pay will not be drawn until and unless a certificate effected by the DEO Concerned the effect thes certificate are verified and found correct and genuine.
- 10. They should join their post within 30 days of the issuance of this notification in case of failure to join the post within 30 days their appointment will be expire automatically and no subsequent appeal shall be entertained.
- 11. Health and age certificate should be produced from the medical superintendent concerned before taking over charge.
- 13. The appointment is made on school based they will have to serve at the place of posting and their services are not transferable to any other station.
- 14.Before handing over charge ,once again the documents may be cheked by the Head masted /Pincipal (Concerned)and if they have not acquired the relevant qualification as per rules ,they may not be handed over the charge of the post , and the case may reported to the Directorate E&SE for with drawf of order.

10-92-2022 10-92-2022 1214

15. The appointment shall take nine months mandatory training at RITE Or .PITE .

ENGLISH SIGNATURE OF

(Hafiz Dr Muhammad Ibrahim)

Director

Elementary and secondary Education

KHYBER PAKHTUNKHWA PESHAWER

ENDS no 4579-86/File No S/A-14SST/Adhoc/Apptt:(BPS-16)Dated peshawer the 16.4.2021

23)

AMONNOE (E)

B. Promotion [(G)

ITEM NOT PROMOTION OF CT/SCT MALE TO THE BASIS

The case of Promotion of CT/SCT Male to SST(G) BP: under:

Tenal No of Vicant Post of SST(G)	
25" e Initial Recruitment Queta	
^{- देव} क श्रेरणाममध्या द्वारमक	
40% CT/SCT Promotion Qualit to SST(G)	NY TARAN MANIESTANIA
20% PST/SPST /PSHT Promotion Quota to SST (G)	
1% DM/SDM Promotion Quata to SST (G)	in the state of th
4% AT/SAT Promotion Quota to SST (G)	
4" (TI STI Premiotion Quota to SST (C)	
35 S Qan Promotion Quota to SST (G)	
Already Promoted CT/SCT PST to SST (G)	
Proposed for Pramotion to SST (G)	

Heffed 1019-2012 Jasen Beffer Copy (A)

EDUCATION DEPARTMENT,S APPROVED CRETERIA FOR PROMOTION TO SST (G)

as given below.

25% Initial Recruitment Quota	
40% SCT/CT Promotion Quota to SST(G)	
20% PSHT/SPST/PST Promotion quota to SST(G)	 -
04% SDM/DM Promotion Quota to SST(G)	
04% SAT/AT Promotion Quota to SST(G)	
04% STT/TT Promotion Quota to SST(G	
03%Qari Promotion Quota to SST(G	

Affeskel 10-02-2022 Agus





OFFICE OF THE DISTRICT LUCIA, ION OFFICER (MALE) KOLAI PALLAS KOHISTAN

NOTIFICATION

In compliance with the order of Director Elementary and Secondary Education Khyber Pakhtunkhawa vide notification issued under 4579.36/File no 5/A.14/SST/Adhoc/Appointment /(BPS/16)Dated Peshawer The 16.04.2021 The following candidates are hereby appointment/adjustment to the post of SST(GENERAL)In BPS 16Rs 18920.1520.64510) fixed plus usual allowance as admissible under the rules on adhoccantract basis under the existing policy of the provincial government in teaching cader. on the terms and conditions given below are hereby posted in the schools against their names in the best interest of public service with immediate

Item No 01 APPOINTED OF SECONDARY SCHOOL TEACHERS G MALE BPS 16
ON ADHOC BASIS UNDER 25% OPEN QUOTA

_=		100 07313	DIADEV 7:	70UPE	N QUOTA				
S	NO	NAME	FATHER NAME	D.O. B	CNIC	Nts ma rks	Acad mark	Total score	School place of DUTY
1	154 002 00	Aziz ulhaq	Fuqra	10.0 2.19 94	13402.4436 997.9	61	67.1 2	128. 12	GHS BADAKOT
2	235 005 48	Hafiz fazalhaqh aqani	Muham mad zurrar	05.0 5.19 86	13402.9415 627.1	56	71.4	127. 43	GHS KuzSheryal

Terms and conditions:

- 1. The appointment are made as per advertisement on the web site of the NTS.
- 2.No TA/ DA is allowed
- 3. Charge reports should be submitted to all concerned in duplicate.
- 4. Appointment is purely temporary and contract basis initially for one year with immediate effect 5. They should not be handed over charge if they exceed 35 year or below 19 years of age. Age relaxation case may be submitted to the Competent Authority.
- 6.If any meritorious candidate is deprived by this order, and the Competent Authority accepts his appeal the appointment order will be reviewed according to the merit.
- 7. Appointment is subject to the condition that the certificates/ documents must be verified from the concerned authorities by the DEO(concerned) any one found producing bogus certificate will be reported to the law enforcing agencies for further action and his appointment shall be denotified from the date of issuance.
- 8. Their service are able to termination on one months notice from either side, in case leaving the department without notice their one month pay/ allowances shall be posted to the government
- 9. pay will not be drawn until and unless a certificate effected by the DEO Concerned the effect thes certificate are verified and found correct and genuine.
- 10. They should join their post within 30 days of the issuance of this notification in case of failure tojoin the post within 30 days their appointment will be expire automatically and no subsequent appeal shall be entertained.
- 11. Health and age certificate should be produced from the medical superintendent concerned before taking over charge.
- 12. Theire services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period or will be extended for another year if found satisfactory
- 13. The appointment is made on school based they will have to serve at the place of posting and their services are not transferable to any other station.
- 14.Before handing over charge once again the documents may be cheked by the Head masted /Principal (Concerned)and if they have not acquired the relevant qualification as per rules they may not be handed over the charge of the post and the case may reported to the Directorate E&SE for with drawf of order.

15. The appointment shall take nine months mandatory training at RITE Or ,PITE.

ENGLISH SIGNURE OF ZAHID HUSSAIN

DISTRICT EDUCATION OFFICER
Male KolaiPalas Kohistan

Endtt: No 7869-76/File .150/appoint:2020:21/DEO (M)KP KH Dated 20/05/2021

AHESTECI 10-93-2022 Azis



OFFICE OF DISTRICT EDUCATION OFFICER (MALE) KOLAI PALLAS KOHISTAN

NOTIFICATION

In compliance with the order of Director Elementary and Secondary Education Khyber Pakhtunkhawa vide notification issuedunder no 4579.B6/FileNo 5/A.14/SST/Adhoc/Appointment /(BPS/16)Dated Peshawer The 16.04.2021 The following candidates are hereby appointment/adjustment to the post of SST(GENERAL)In BPS 16Rs 18920.1520.64510) fixed plus usual allowance as admissible under the rules on adhoccantract basis under the existing policy of the provincial government in teaching cader. on the terms and conditions given below are hereby posted in the schools against their names in the best interest of public service with immediate

ITEM No .01 APPOINTED OF SECONDARY SCHOOL TEACHERS G MALE BPS 16 ON ADHOC BASIS UNDER 25%OPEN QUOTA

S ROLL / NO	NAME	FATHER NAME	D.O.B	CNIC	Nts marks	Acad marks	Total score	School place of disty
1 154 002 00	AdilSheh zad	Sher Ghazi	04.1 2.19 94	13402.44 36997.9	70	51.2 8	121. 87	GMS KUNSHER

Terms and conditions:

- 1. The appointment are made as per advertisement on the web site of the NTS.
- 2.No TA/ DA is allowed.
- 3. Charge reports should be submitted to all concerned in duplicate.
- 4. Appointment is purely temporary and contract basis initially for one year with immediate effect 5. They should not be handed over charge if they exceed 35 year or below 19 years of age. Age relaxation case may be submitted to the Competent Authority.
- 6.If any meritorious candidate is deprived by this order, and the Competent Authority accepts his appeal the appointment order will be reviewed according to the merit.
- 7. Appointment is subject to the condition that the certificates/ documents must be verified from the concerned authorities by the DEO(concerned) any one found producing bogus certificate—will be reported to the law enforcing agencies for further action and his appointment—shall be denotified from the date of issuance.
- 8. Their service are able to termination on one months notice from either side, in case leaving the department without notice their one month pay/ allowances shall be posted to the government
- 9. pay will not be drawn until and unless a certificate effected by the DEO Concerned the effect thes certificate are verified and found correct and genuine.
- 10. They should join their post within 30 days of the issuance of this notification in case of failure tojoin the post within 30 days their appointment will be expire automatically and no subsequent appeal shall be entertained.
- 11. Health and age certificate should be produced from the medical superintendent concerned before taking aver charge.
- 12. Theire services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period or will be extended for another year if found satisfactory
- 13. The appointment is made on school based they will have to serve at the place of posting and their services are not transferable to any other station.
- 14.Before handing over charge once again the documents may be cheked by the Head masted /Principal (Concerned) and if they have not acquired the relevant qualification as per rules, they may not be handed over the charge of the post and the case may reported to the Directorate E&SE for with drawf of order.

15. The appointment shall take nine months mandatory training at RITE Or , PITE .

ENGLISH SIGNURE OF

ZAHID HUSSAIN

DISTRICT EDUCATION OFFICER
Male KolaiPalas Kohistan

Endtt: No 7869-76/File .150/appoint:2020:21/DEO (M)KP KH Dated 17/08/2021

AHESTED 1992-2022 FAM

HAMBIAR KHAK

SHEIKH ULISLAM

DOCMHAM IVION

AMIP HAMIA

HBRANTULLAR

ASALM

N.ANSH'

DAR US SALAM

JAECHUL OAYUM

BARKAT ULLAH

KARBAULLAR

SAIFUR REHMAIL

PROOF VERSLAM

MUHAMMAED HASEEM

335229

335283

73522€

4(13):55

705623

747604

7442335

13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOLAI PALLAS KOHSITAN TENTITIVE SENIORITY LIST OF IT, STT PROMOTION TO SST (G) AS STOOD ON 25-08-2020 Date of 1st App' Govt: Service Mabre CNIC No. of Birth Acamdemic Qualification Place of Posting Designation s of hed, Pres Falher Name Name of Teacher f/No. KOHISTAN I GHSS BATTAIRA 13403-0166755-3 25 06 1992 26.04.1992 KOHSTAL GHSS MAID 411 KOKA 54 16 SSC 13402-1154744-3 29.52,1951 01.12,2006 02.12,2006 KCHISTAN MI/LIK LARANG GHS PARA GASHI 13501-2248770-5 | 0345-9605783 5,5% 16 | 55C 31.12 1965 28.12 1994 29.12 1994 335260 \$2.77 KOHISTAN ME HAMMAD SACEE GHS KHARO GADAR 13400 1155354-3 | 0345-5649632 4/41,040 16 SSC SZAUZ 370676 15.12.1975 15 10.1996 16.10.1996 58,T) KOHISTAN DALANDAR GHS SHARAKOT CALMALUJA IDP 355040 SR.TT 16 SSC 13407 3263978-5 61 C1.1969 23.05 1997 24 02 1997 KOHISTAN LIMAR KHAN GMS MAHPEEN KOLAI DARDUL HAD 16 530 13400-1150169 1 | 0344 1854176 4 | 335396 SP.T. SAHAD 01.01 1945 25.05.1993 26.05.1993 SHES CFZAL KOHISTAN GMS PEECH BELA HAZZE TAYALL 332716 15 27.05.1993 29.05.1993 13402-1152631-MEET AMAN KOHISTAN 1765 GMS GHAZI ABAD 335208 LANGUSAF 3/AUA 5/ALM | 01.01.1970 24 12.1995 25 12 1995 13403-0165443 ISMAIL MALOON SALED DE REIDAN KOHISTAN GMS DILKANDOW 335235 01.07.1970 24.12 1995 26.12.1995 13402-1154915-1 PIP DAD SAM CAMMAPUM KOHISTAN 325392 5/ALM GMS SHALKHAN ABAD 27.08.1997 23.08.1997 HAS MORSIN 13403-572186-4 KOHISTAN 340784 KBAH ZAMAN 5/ALM GM5 MADA KHAIL ABAD 15 05.04 1999 06.04.1999

14.05.1999

01.12.2006 D4.12.2006

28.06.2013 29.06.2013

20.03.2015 21.03.2015

20.05.1989 20.03.2015 21.03.2015

1391,10,10

01,07,1973

07.05.1985

S/ALM | 01.01.1981

01.01.1974 13.08.1999

S/ALM

S/ALM

5/ALM

MA S/ALM

1.5

15

BA

KOLAI PALTAS KOHISTAN

15501-2263425-9

42101-835129c 1

13201-0377266-1

KOHISTATE 42201-49801849 5

13403-9880849-9 0347-1893167

KOHISTAIN

KOHISTAN

KOHISTAN

KOHISTAN

GMS SHAMAL GALL

GMS SEER BAR PALLAS

GMS KOLAI

GMS BAR SHERIAL

GMS HUKAM ABAD

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOLAY PALAS KOHISTAN TENTITIVE SENIORITY LIST OF TT,STT PROMOTION TO SST (G) AS STOOD ON 25-8-08-2020

S	P/NO	Name of teacher	Father name	Desi gniti on	BPS	Acade mic qualifi cation	sional	D.O.B	Date of first app as regular	Place of podting	domicle	CNIC
1	335202	SALEEMULLAH	MALAK NARANG	STT	15	SSC	SA	06.08.70	25.06.92	GHSS Bttera	KOHISTAN	1350306799807
2	370678	Fazal Dad	Muhammad saeed	STT	16	SSC	SA	29.02.81	1.12.06	GHS Madakhailkoali	KÖHISTAN	1340301667563
3	335245	Rahmatullah	Qalandar	STT	16	SSC	SA	31.1265	28.12.94	GHS ParaGhrhi	KOHISTAN	13402.1154744.3
4	335396	Abdul haq	Urnar khan	STT	16	SSC	SA	15.12.75	15.10.96	GHS KHaroGadar	KOHISTAN	13501.2248270.5
5	332718	Inayatilah	Sher Afzal	STT	16	SSC	JDP	1.1.69	23.8.97	GHS Sharakot	KOHISTAN	13402.1155354.3
6	335238	Sanoobar	Meer aman	TT	15		SA	1.1.65	25.5.93	GMS Mahreenkoli	KOHISTAN	1340232639785
7	335235	Saeed urRehman	Ismaleelmalook	177	15	SSC	SA	1965	27.5.93	GMS Peechbela	KOHISTAN	13402.11551891
8	335352	Muhammad Nabi	Pir dad	TT ·	15		SA	1.1.70	24.12.95	GMS Ghazi abad	KOHISTAN	1340211526319
9	340784	Khan zaman	Haji mohsin	Π	15		SA	1.7.70	24.12.95	GMS dilkando	KOHISTAN	1340301654431
10	335229	Daar us slam	Jamdar khan	П	15		SA	1969	28.8.97	GMS Shalkhanabad	KOHISTAN	1340211549155
11	335288	Abdul qayum	Aslam	TT	15	SSC	SA	1.1.81	5.4.99	GMS Makhailabad	KOHISTAN	13403.572186.9
12	335226	barkatullah	Shekhilislam	П	15	SSC	SA	1.1.74	13.8.99	GMs ShamalGali	KOHISTAN	15501.2283428.9
13	403153	Muhammad Naseem	manshi	П	15		SA	1.7.73	1.12.06	GMS Seer bar palas	KOHISTAN	13403.9880849.9
14 15	705633	Kareemullah	Amir hamza	π	15	Ва	SA	7.5.85	28.6.13	GMS koli	KOHISTAN	42101.8381296.1
15	747604	SaifUr Rehman	MaulviMehmood	π	15	MA/ BED	SA	20.05. 89	21.3.15	GMS Bar Sheryal	KOHISTAN	1320103772661
16	744288	Noor ulislam	Nimatullah	П	15	ВА	SA	1.1.81	21.3.15	GMS Hukumabad	KOHISTAN	4220149801849.5

Hested 10-02-2012

Allama Ighal Open Un Islamabad L





Serial No. A185325

Certified that Mr. / Ms.

SAIF UR REHMAN

Son / Daughter of

MAULVI MEHMOOD

Registration No :

15NKN00328

Roll No: BP772687

having completed the prescribed requirements in semester

AUTUMN 2018

is awarded the degree of:

MASTER OF PHILOSOPHY IN ISLAMIC STUDIES

He/She has secured 71 % marks and has been placed in A grade.

Chi

CONTROLLER OF EXAMINATIONS

Result declared on: Oct

October 12,2021

Date of Issue:

January 14,2022

AZ/M OPE

VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

Serial No. 011217

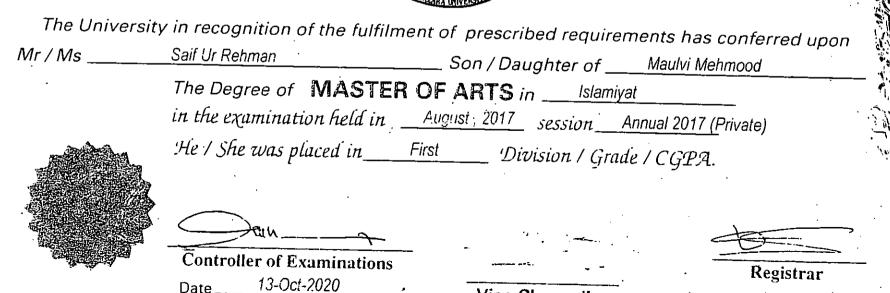


Registration No.	<u>14-PM-831</u>
Roll No	49154

HAZARA UNIVERSITY

Mansehra, Pakistan





Vice Chancellor

10-02-7022 10-02-7022

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

Serial No

828197

Roll No.

Registration No.

Final Semester

BF631469

15NKN00328 SPR-2016

SAIF UR REHMAN

Father's Name MAULVI MEHMOOD

C/O NADEEM OIL SHOP PROP HAJI FAZAL REHMAN

P/O KOMILA

Tehsil

aenbLA

DASU

Distract

KOHISTAN

has successfully completed

BACHELOR OF EDUCATION (B.ED)

The detail of passed courses

Semester	Course	Title of Courses	•	Ma	rks
	Code		-	Maximum	Obtained
AUT - 15	0512	PERSPECTIVE OF EDUCATION		100	75
AUT- 15 -	0513	SCHOOL ORGANIZATION		100	84
AUT- 15	0514	EVALUATION, GUIDANCE & RESEARCH	i	100	64
AUT- 15	0518	EDUCATIONAL PSYCHOLOGY		100	72
AUT- 15	0651	ENGLISH (COMPULSORY)	-	100	, , <u>, </u>
AUT- 15	0652	ISLAM, PAKISTAN AND MODERN WORLD		100	69
SPR- 16	0517	TEACHING OF PAKISTAN STUDIES		100	65
SPR- 16	0654	ISLAMIAT AND ITS TEACHING		100	68
SPR- 16	0655	WORKSHOP		100	61
	į	•			
	1			ļ	
	: :				
		•	•		
				}	
				!	ļ.
	*		•	-	
					ĺ
	. :			!	
		·			1 •
	į				
-					!
					!
	1	·			
	1			<u>L.,,</u> ,	J

Total Credits

Result Declared on JANUARY 17,2017 FEBRUARY 01,2017 Total Marks/Obtained Percentage/Grade

900

69

Controller of Examination

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer an 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.

Director General

Director General Elementry & Secondary Education, KPK Plananar.

Subject: Appeal (Regarding promotion from T.T to Sit (

Most esteemed Si, Share the honour to lay down the following few le for your very kind order blease.

1) That I belong to an extremely backward area of Dist k. Polar

2, That a appointed on 20.3.2215 as Theology Teacher.

3. That OF 25.8.20 20 D. E.O (M) office has asked us for Submission of application for Transaction to

Sub-mission of application for premotion purpose. In That among all the TIT, & SIT, ATI SATUROXISES DOLO ON

Jan MA. BEd degree holder and fil-for subjected purp 5, That the DEO(M) office deprived me to grant me promotion to SST (G) against 4/ P. Bluste Walth Plea like wichene no f

Sw) on therhand a disable person appointed as I against ?

Queta on total 39 sanctionted posts as photo copy attacked

6. That there are 41 total Santioned posts for Est

6, That there are 41 total Santiened posts for 55T ca, among

is therefore, appealed in your excellency that you man Kindly I some order for implementation of the Theology Je 4 ! Quality for promotion to SST(G) Kills in the bounds of pure; and Compressionate grounds, I shall be extremely 140

1-11/4 prefound regards!

DATE 9.11. 2020

Should a Collins

Jour Sociarity

SAIF-UR-REHMAN S/O Mawer: Mehmand Jeology Teacher at Gaminddle Saharl Borkher District: Hother K. Pallok

Justen Gentry

His Excellency Director General

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawer

Subject : APPEAL REGARDING PROMOTION FROM TT TO SST GAGAINST 04%QUOTA

Most esteemed sir,

I have the hounour to lay down the following few line for you very kindly order pease.

1) That I belonged an extremely backward area of district Koly Paias kohisatan

2) That I appointed on 20/03/2015 as the logy teacher

- 3) That on 25/08/2020 DEO M office asked us for submission of application for promotion purpose.
- 4) That among all the TT ,STT,AT ,SAT on I am MA Bed degree hoder and fit for subjected purpose.
- 5) That the DEO M office deprived me to grant me promotion to SSG against 4% quota with plea that we have no posts.
- 6) Sir onther hand a disable person appointed as CT against 2%quota on total 39 sanctioned posts
- 7) That there are total 41sanctioned posts for SST G among 1% seat is due for 4% quota of TT.STT for promotion.

 Keeping in view the above mentioned facts is therefore, appealed in your excellency that you may kindly issu order for implementation of the theology teacher 4% quota for promotion to SST G with in the bounds of pure and compassionate grounds, I shall be extremelygrateful ful to you.

With profound regards.

Dated 09.11.2020

Your servant
Saifur Rehma S/O
Mualvi Mehmood
Thelogy Teacher at
GMS bar Sheryal l

34) AMILIMATY

BENCH ABBOTTABAD

W.P. No. 1469 0(2

Versus

1) Government of Khyber Pakhtunkhwa through Secretary elementary & Secondary Education, Peshawar

2) Director Elementary & Secondary Education, Peshawar.

3) District Education Officer (Male) Kolai Pallas Kohistan

...Respondents

WRIT PETITION UNDER ARTICLE 199 READ WITH ARTICLE 4, 25 AND 27 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973, FOR A DECLARATION TO THE EFFECT THAT WITHHOLDING THE **PROMOTION** ORDER/NOTIFICATION OF PETITIONER AGAINST THE POST OF SST(G) BPS-16 EXECUTIVE BY THE RESPONDENTS. DESPITE HAVING FULLY SATISFIED THE ELIGIBILITY CRITERIA IS ILLEGAL, **UNLAWFUL** AND WITHOUT LAWFUL AUTHORITY.

10.00 /2 /2/

PRAYER: -

On acceptance of the instant writ petition that this Honourable Court may graciously be pleased to issue

Certified to be True Copy
EXAMINER

3 1 JAN 2022

Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordns



direction to the respondents to promote the petitioner against the post of SST(G) executive under the relevant rules or any other writ. order relief which this Honourable Court deems fit and appropriate in the circumstances of the case, may also be issued/ passed.

Respectfully Sheweth!

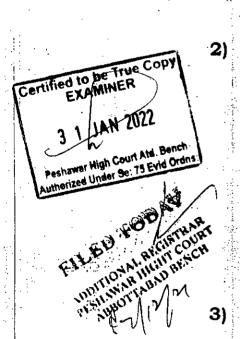
That, the petitioner was initially appointed against the post Theology Teacher (TT) BPS-15 on 20.03.2015 in Education Department of the Government of Khyber Pakhtunkhwa Kohistan.

> (Copy of the appointment order is annexed as Annexure "A").

That, due to meritorious services rendered by the petitioner excellent high qualified record the petitioner was promoted to the post of Senior Theology Teacher Male (SST) BPS-16 on dated 23.11.2021.

(Copy of the promotion notification is annexed as Annexure "B"].

That, the respondents notification on dated 31.12.2020 and promotion criteria for the post



of SCTs and PSHTs male were promoted against their respective quota.

(Copy alongwith better copy of notification is annexed as Annexure "C").

That, in-fact the approved criteria policy to promotion for SST(G) 25% initial promotion quota is reserved for promotion quota, but respondent No. 2 issued a notification on dated 16.04.2021 in which department granted 30% hence the petitioner is discriminated.

(Copies of reserved promotion to SST(G) quota and notification are attached as Annexure "D", "E" & "F")

That, according to the existing 4% promotion policy quota SST(G) is reserved for theology teacher and Senior Theology Teacher. Though the petitioner is serving in this department for many years and no adverse entry against the petitioner in his ACR nor any complaint was ever moved against the petitioner.

(Copy of ACR alongwith better copy is annexed as Annexure "G").

That, the petitioner is high qualified having MA, B.Ed education and eligible in all respect for the promotion in all respect for the

Certified to be True Copy
EXAMINER

3 1 IAN 2022

Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordns

5)

PARTITIONAL RECIPIONER

SPOTTONAL RECIPIONER

SPECIAL PROPERTY OF THE PROPERTY



promotion to SST(G) no other candidate available and post is vacant.

(Copy of educational record document is annexed as Annexure "H").

7) That, feeling aggrieved the petitioner filed a departmental appeal to respondent No. 2 on dated 09.11.2020 but nothing came out of it.

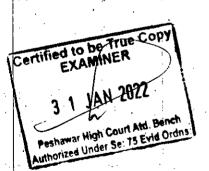
(Copy of the departmental appeal is annexed as Annexure "I").

That, feeling aggrieved and having no other remedy available the petitioner approach this Honourable Court interalia, on the following amongst other grounds:

GROUNDS: -

B)

- A) That, the petitioner is naturally born bonafide citizen of Pakistan and is fully and equally on equality basis entitled to all basic and fundamental rights as enshrined in the fundamental laws of land interpreted, guaranteed and forced by the laws of land.
 - That, as per rules only criteria as a postulated therein as the seniority cum fitness and not vice versa.
- C) That, even if any notification or policy is contradictory to the mother



law the same is supposed to be declared as illegal and unconstitutional.

- D) That, the petitioner is discriminated and is treated in violation of Article 4, 25 and 27 of the Constitution of Islamic Republic of Pakistan.
- That, since 2015 till now petitioner promoted to Senior Theology Teacher (STT) BPS-16 while petitioner is entitled to Secondary School Teacher (SST) "G" BPS-16 because having high qualification and fulfilled the criteria.
- F) That, according to police and promotion as per approved criteria of the department promotion/appointment of SST "G" in initial recruitment is reserved 25% which means 2 and half seats but on dated 16.04.2021 the respondent No. 2 appointed three candidates hence filled 30% open quota.

That, the petitioner post is vacant yet and fulfilled the criteria and this Honourable Peshawar High Court Peshawar in writ petition No. 3398-P/2014 vide judgment and order dated 04.02.2015 has categorically

Certified to be True Gopy
EXAMINER

3 1 JAN 2022

Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordns.

FITED FOR ALL THANKS



held that only rules are to be followed and not the caprices and whims of the officers.

- H) That, from every angle the petitioner is entitled to be promoted as SST "G" BPS-16 with effect from 16.04.2021 with all back benefits of arrears, promotion and seniority.
- That, the notices have been sent to all respondents through registered cover and proper court fee of Rs. 500/- has been affixed.
- That, any other ground will be raised at the time of argument with the prior permission of this Honourable Court.

It is, therefore, most humbly prayed and requested that on acceptance of the instant writ petition that this Honourable Court may graciously be pleased to issue direction to the respondents to promote the petitioner against the post of SST(G) executive under the relevant rules or any other writ, order or relief which this Honourable Court deems fit and appropriate in the circumstances of the case, may also be issued/passed.

Dated 01/12/2021

Saif-Ur-Rehman

(Petitioner)

Through: -

M. TASLEEM KHAN KALOCH

Advocate High Court, District Courts, (Mansehra)

Certified to be True Copy EXAMINER

3 1 JAN 2022

Peshawar High Court Atd. Bench Authorized Under Se: 75 Evid Ordns

·维德特(《大学》(1915年)(1915年)(1915年)

FILED FOR THE TOURT



VERIFICATION

I, SAIF-UR-REHMAN SON OF MOLVI MEHMOOD. SENIOR THEOLOGY TEACHER, POSTED AT GOVERNMENT HIGH SCHOOL KUZ SHARIAL PALLAS, DISTRICT KOLAI PALAS KOHISTAN DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING WRIT PETITION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE COURT.

SAIF-UR-REHMAN (DEPONENT) 为"那么"的基本。"如何的是GP模型。



ADDITIONAL RECIETARE
PESSIVED TRANSPORTATION OF THE PERSON OF THE PERSON



BEFORE THE PESHAWAR HIGH COURT BENCH ABBOTTABAD

W/ 1469 1/2/

Saif-Ur-Rehman.....Petitioner

Versus

WRIT PETITION

AFFIDAVIT

I, SAIF-UR-REHMAN SON OF MOLVI MEHMOOD. SENIOR THEOLOGY TEACHER, POSTED AT GOVERNMENT HIGH SCHOOL KUZ SHARIAL PALLAS, DISTRICT KOLAI PALAS KOHISTAN DO HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT NO SUCH SUBJECT MATTER WRIT PETITION HAS EVER BEEN FILED NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE COURT.

SAIF-UR-REHMAN (DEPONENT)

IDENTIDFIED BY: -

M. TASLEEY KHAN KALOCH ADVOCATE HIGH COURT, DISTRICT COURTS, MANSEHRA 13201-037766-1

MANSEHRA A	FFIDAVIT	The second	
S.No: 6660 18		pt No: _ 86	
Certified that the	aboye was ve	rified on Solemn	
affirmation	bef day.of	ore me on ans	
Sort we flet	magn gla 1	Melfi Mana	C
RIO Fache	The Hay Identi	lly Kright is the	, ř.

Oath Commissione
Auditional Registrar)
Frshawar Hight Court Abbottabad Bench

ADDITIONAL RECUE COURT
PESSIONAL PROPERTY AND PROPERTY AN

Certified to be True Copy
EXAMINER

3 1 JAN 2027

Peshawar High Court Atd. Bench Authorized Under Se: 75 Evid Ordna



PESHAWAR HIGH COURT, ABBOTTABA



Date of Order of Proceedings with Signature of Judga 1 2 4880713200 18.01.2022 WP No. 1469-A/2021

Present: Muhammad Tasleem Khan, Advocate, for the

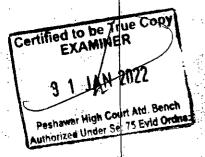
petitioner.

MOHAMMAD IBRAHIM KHAN, J.- At the very outset, learned counsel for the petitioner stated at the bar that he would not press this petition anymore, if the same is treated as representation and sent to the competent authority for consideration.

In view of the above, this petition is treated as representation and the office is directed to send the same to the competent authority for consideration and decision of the same in accordance with law within a shortest possible time.

JUDGE

JUDGE



who who who who sales who sales	यार यहर यहर यहर यह	र कर कर कर कर कर
DBAM No	S.No 11022	SOCIATOR
BC No. 18-5711	Fee Rs. 100/-	
Name of Advocate 2500 C15 15		
	كالنك نامه	2020-21
	Di	General Georgians strict Bar Association Mansehra
- jty figur	, 10/0/0/3	
	_	•
بنام: على من المركزة والله المركزة الم	, , , , , , , , , , , , , , , , , , ,	عنوان: مسفر
نوعیت مقدمہ: <u>کو سی اسی</u> ۱۵۰۸ ۱۵۸۸ ۱۵۸۸	AREGUM	مخاب: سانکر
نچررآ نکه پچررآ نکه	اعده	
· · · · · · · · · · · · · · · · · · ·	ب سے ن بالا میں اپنی طرف سے برائے پیروی وجوار	
1/2/8/200	20 1/2:1: 1 - 1 - 1	در ین مقدمه خوار
ے بر میم بر معرف میں میں میں ہوتا رہوں گا اور بوقت پکارے ۔۔۔۔۔۔ پر متحار خاص رو بروعدالت حاضر ہوتا رہوں گا اور بوقت پکارے ۔		
یر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ	•	7 " 1
دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچبری کے علاوہ	گیا تو وکیل موصوف اس کے کسی طرح ذمه،	میرے خلاف ہؤ
پیردی کرنے کے مجاز نہ ہوں گے۔اگر مقدمہ بچہری کے علاوہ 🔛	ی کے مقررہ اوقات سے پہلے یا بروز تعطیل	کی اور جگه کچهر
ماعت ہونے پرمظہر کوکوئی نقصان پنچے تو وکیل موصوف ذمہ دار ا	ت ہوا یا کچبری کے اوقات کے آگے بیچھے۔ ۔	ن کی اور جگه ساع
اء ڈگری ونظر ثانی اپیل نگرانی دائر کرنے نیز ہرقتم کی درخواست میں کی تھا ہے گئی میں ہوری میں نے مقتر میں میں ا		
وگا۔اور کسی حکم یا ڈگری کے اجراء کرانے اور قشم کا روپیہ وصول سے الثہ رہنس والسنٹ بریں قرار عربا کیا ہے۔ انہے میں عالم	ل کرنے اور اسپر دستخط کرنے کا بھی اختیار ہ میں مضام میں زیر مشریریں	بيان على وتفيد لؤ
سپر د ثالثی وراضی نامه و دستبر داری و اقبال دعویٰ کا اختیار بھی ہوگا یحکم امتناعی یا فیصلہ قبل از ڈ گری اجرائے ڈ گری بھی وکیل موصوف	یے اور داش کرنے کا ہر م کا بیان دیے اور تن گی مقد . ۔ امنسوخی ڈگری کیطر فر در خواسہ	الرائے اور دسیدا
بر ورت بدوران مقدمه یاا بیل وگرانی کسی دوسرے وکیل یا بیرسٹرکو	. معنی عندسه یا سون و رو سرد میرورد. لمحد ه محنتانه ادا کرنے کا محاز ہو نگااور بصورت ض	جورت اول ور کریشه طاله انتگاری
امریس وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو م	یعدہ معمر کریں اور مشیر قانونی کو بھی اس یے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس	ر. او بحائے خود ماات
ىوف كو پورااختيار ہوگا كەمقدمەكى بىردى نەكرى <u>ن ادرالىي حالت</u>	تاریخ پیثی ہے پہلے ادانہ کروں گا تو وکیل موص	الاستالي تا اورا گر پورې فيس
ساخته پرداخته وکیل موصوف مثل ذات خودمنظور وقبول ہوگا۔	یل موصوف کے برخلاف نہیں ہو گا مجھے کل	میں میرا مطالبہ و
ررہے۔مضمون وکالت نامہ کن لیا ہے اور اچھی طرح سمجھ لیا ہے۔	ر دیا ہے اور دستخط / انگوٹھا ثبت کر دیا ہے تا کہ سن	لبذا وكالت نامه كو
2022 Sur 10 315		1.3
Mr.		
		1 1/2
ACCEPTED		MP,