

19.08.2022


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


Reader

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.




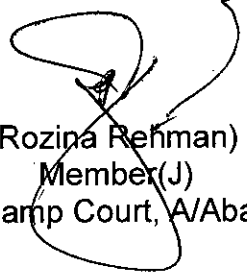


(Rozina Rehman)
Member (J)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 202/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/02/2022	<p>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 please.</p> <p> REGISTRAR</p>
2-	18.04.2022	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put there on </p> <p> CHAIRMAN</p>
	17.06.2022	<p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for 17.06.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p> (Rozina Rehman) Member(J) Camp Court, A/Abad</p>
		<p>Nemo for appellant.</p> <p>Despite directions, notice was not issued to appellant/counsel. Therefore, fresh notice be issued to appellant and his counsel for 19.08.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p> (Rozina Rehman) Member (J) Camp Court, A/Abad</p>

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Saifud Rehman vs GOVT of KPK

S.#	Contents	Yes	No
1.	This appeal has been presented by: _____		
2.	Whether Counsel / Appellant / Respondent / Déponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
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?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
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?		✓
17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
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**

Appeal No. 202/2022
Saif-Ur-Rehman.....Appellant

Versus

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

WRIT PETITION

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Dated 10/02/2022

Saif-Ur-Rehman
Saif-Ur-Rehman
(Appellant)

Through: -

M. Tasleem Khan Kaloch
M. TASLEEM KHAN KALOCH
Advocate High Court,
District Courts,
(Mansehra)

①

**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Appeal No. _____ of 2022

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

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

②

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").

- 2) 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 23.11.2021.

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

- 3) That, the respondents issued notification on dated 8.12.2020 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

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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").

- 8) That, the appellant approached to 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 *inter-alia*, on the following amongst other grounds: -

GROUND: -

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

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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 Article 4, 25 and 27 of the Constitution of Islamic Republic of Pakistan.
- D)** That, since 2015 till now appellant 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.
- E)** 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.

(6)

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%	
CT	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

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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. TASLEEM 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)

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**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Saif-Ur-Rehman.....Appellant

Versus

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

WRIT PETITION

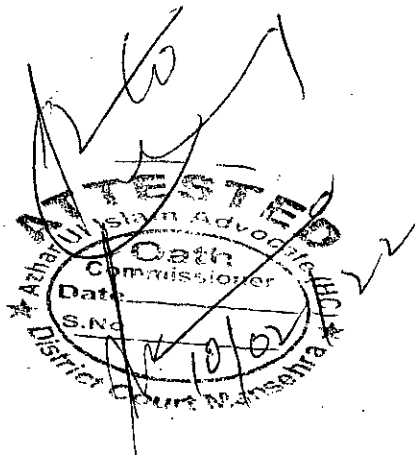
AFFIDAVIT

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)

IDENTIFIED BY: -


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



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**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Saif-Ur-Rehman.....Appellant

Versus

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

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

Phone No. 0995-47128

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ANNEXURE (A)

APPOINTMENT

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, adhoc base and on Contract under the existing policy of the Provincial Government of Khyber Pakhtunkhwa, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

Sr. No	Name	Father Name	Score	Name of School
1	Muhammad Younas	Pir Dad	108.28	GMS Basha
2	Liakat Ali	Hajab	97.71	GMS Shemal Guli Pattan
3	Karimullah	Muhammad Hamza	94.14	GMS Qala Kolai
4	Noor ul Islam	Naimattullah	93.66	GMS Hukam Abad
5	Lai Sher	Muhammed Seraj	93.21	GMS Sazin
6	Saifur Rahman	Molvi Mehmood	93.06	GMS Gulab Abad

TERMS & CONDITIONS.

1. No TA/DA is allowed.
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 age. 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. In case of resignation without notice his one-month pay/ allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificates/ Documents are verified.
8. 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.
10. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded 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 disbursing 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.

Attested
10-02-2022
JESU

District Education Officer
(Male) Kohistan

Encl: No. 2311-18 /DEO (M) KH, Dated: 20/3/2015

Copy forwarded for information and necessary action to the:-

1. District Accounts Officer Kohistan.
2. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. PA to Deputy Commissioner Kohistan.
5. Deputy District Education Officer (M) Kohistan.
6. Head Masters/Incharge concerned schools.
7. Teachers concerned.
8. Local Office.

District Education Officer
(Male) Kohistan

Better copy 10-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 Provincial government of Khyber Pakhtunkhwa, in teacher cader on the terms and conditions given below with effect from the date of their taking over charge.

S	NAME	Father name	Score	Name of school
1	Muhammad Younas	Pir Dad	108.28	Gms Basha
2	Liaqat 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 duplicate.
3. Appointment is purely on temporary and contract basis initially for one year.
4. He should not be handed over charge if he exceeds 35 years or below 18 year of age. 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 service are liable to termination on one month's notice from either side, in case of resignation without notice his one month's pay / allowances shall be forfeited to the government.
7. Pay will not be drawn until and unless a certificate documents are verified.
8. 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 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.
10. He will be governed by such rules 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 performance is found unsatisfactory during his contract period, in case of mis conduct, 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 disbursing officer are directed that before handing over charge once again their documents may be checked if they have not the require relevant qualification as per rule they may not be handed over charge of the post.

ENGLISH SIGNATURE OF
DISTRICT EDUCATION OFFICER
Male Kohistan

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

Attested
18-02-2015
[Signature]



Notif

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

ANNEXURE (B)

In pursuance of the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/10-22(E) 2010 dated 16.7.2012, the following 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.

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

Total No. of Sanctioned Post of CT	59
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	03

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	1	Riaz Ahmad	GMS Mada Khail Abad	03/10/1987	20/03/2015	MA M.Ed	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect.
2	2	Muhammad Haq	GMS Mahreen Kolai	15/08/1988	09/03/2016	MA M.Ed	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect.
3	3	Abdullah	GMS Shalkhan Abad	15/06/1991	09/03/2016	BSc,CT	Services are placed at the disposal of DEO (M) Kolai Pallas 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
1/3 rd 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#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular DM	Qual:	Remarks
1	6	Fazal Raheem	GMS Seer Bar Palas	04/07/1975	31/12/2010	BA,DM	Services are placed at the disposal of DEO (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

Total No. of Sanctioned Post of AT	28
1/3 rd Share of SAT Posts	9
Share of Promotion Quota of SAT	100%
Already Promoted to SAT	04
Posts Available for Promotion to SAT	05
Proposed AT for Promotion to SAT	03

S#	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 DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect.

Attested
10-07-2022
[Signature]

Promotion of Senior Teachers of District Kolai Pallas Kohistan

6	Inayat Ur Rehman	GMS Mahreen Kolai	01/12/1996	09/03/2016	MA, S.Alamia	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect.
3	Ghulam Ullah	GMS Jan Bela	05/11/1987	20/03/2015	MA, S.Alamia	Services are placed at the disposal of DEO (M) Kolai Pallas Kohistan for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect.

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

Total No. of Sanctioned Post of TT	25
1/3 rd Share of STT Posts	9
Share of Promotion Quota of STT	100%
Already Promoted to STT	5
Posts Available for Promotion to STT	04
Proposed TT for Promotion to STT	02

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular TT	Qual:	Remarks
1	7	Saif ur Rehman	GMS Bar Sherial	20/05/1989	20/03/2015	MA, S.Alamia	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.
2	8	Noor ul Islam	GMS Hukam Abad	01/01/1981	20/03/2015	BA, S.Alamia	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.

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


Total No. of Sanctioned Post of PET	28
1/3 rd Share of SPET Posts	9
Share of Promotion Quota of SPET	100%
Already Promoted to SPET	6
Posts Available for Promotion to SPET	03
Proposed PET for Promotion to SPET	03

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PET	Qual:	Remarks
1	2	Saif ul Amir	GMS Dil kadow	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	Muhammiad 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 Bazni	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:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 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.
- 7 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.

Attested
10-03-2022
[Signature]



Before handing over charge 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

(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 Education
Khyber Pakhtunkhwa Peshawar

Attended
10/12/2022
[Signature]

15

NOTIFICATION

In compliance with the Notification of Director General of Secondary Education, Khyber Pakhtunkhwa, Peshawar vide Notification issued under the Order No. S259-55/199 No.4/Promotion Senior Teachers (BPS-16) Dated Peshawar, 14.09.2021 and in continuation of revised notification of even number on 15.11.2021 the following CT, DM, AT, IT and PET in BPS-15 (Male) promoted to the post of Senior CT, Senior DM, Senior AT, Senior IT and Senior PET in BPS-16 (Ns.10930-1223-64519) on usual allowance as admissible under the rules on regular basis and under the existing policy of the provincial Government on the terms and condition given below are hereby posted in the schools noted against their names in the best interest of public service with effect from the date of taking over charge.

Item No.1: PROMOTION OF CT (BPS-15) MALE TO SENIOR CT (BPS-16)

Sl. No.	Name of Teacher	Designation	Name of Present School	Name of Posted School	Grade
1	Riaz Ahmad	CT (BPS-15) to SCT (BPS-16)	GMS Madakhail Abad	GMS Gulistan Madakhail	12/1
2	Muhammad Niaz	CT (BPS-15) to SCT (BPS-16)	GMS Mairan Keld	GMS Baital	12/1
3	Abdulqadir	CT (BPS-15) to SCT (BPS-16)	GMS Madakhail Abad	GMS Baital	12/1

Item No.2: PROMOTION OF DM (BPS-15) MALE TO SENIOR DM (BPS-16)

Sl. No.	Name of Teacher	Designation	Name of Present School	Name of Posted School	Grade
1	Fazal Raheem	DM (BPS-15) to SDM (BPS-16)	GMS Sagar Bar Pafos	GMS Madakhail Abad	12/1

Item No.3: PROMOTION OF AT (BPS-15) MALE TO SENIOR AT (BPS-16)

Sl. No.	Name of Teacher	Designation	Name of Present School	Name of Posted School	Grade
1	Muhammad	AT (BPS-15) to SAT (BPS-16)	GMS Madakhail Abad	GMS Khar Shikhar	12/1
2	Inayat Ull Rehman	AT (BPS-15) to SAT (BPS-16)	GMS Mairan Keld	GMS Kharo Gudar	12/1
3	Shaham Ullah	AT (BPS-15) to SAT (BPS-16)	GMS Jan Bala	GMS Baital	12/1

Item No.4: PROMOTION OF IT (BPS-15) MALE TO SENIOR IT (BPS-16)

Sl. No.	Name of Teacher	Designation	Name of Present School	Name of Posted School	Grade
1	Saif Ull Rehman	IT (BPS-15) to SIT (BPS-16)	GMS Bar Shikhar	GMS Baital	12/1

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 10-02-2022
[Signature]

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Sl. No.	Name of Teacher	Designation	Name of Present School	Name of Proposed School
1	Sher Afzal	PEI (BPS-14) to SR-PEI (BPS-16)	GMS Buzni	GMS Buzni
2	Mohd. ...	PEI (BPS-14) to SR-PEI (BPS-16)	GMS Buzni	GMS Buzni

Note: Mr. Sher Afzal PEI BPS-14 working against BPS-16 at GMS Buzni is hereby directed to perform his duties in GMS Buzni against the vacant post of PEI (BPS-14).

Terms and conditions:

1. They would be on probation for a period of one year extendable for not less than one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, if their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
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.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in light of this order it will be repaid. If they are wrongly promoted they will be reversed.
8. Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.
9. All DDOs of Higher Secondary/High Schools are directed to check/verify their BA degree and professional degree before draw of their pay. If any consequences arise later on all DDOs will be held responsible.

(Sd/-) SAHIB HUSSAIN
District Education Officer (Admin)
Kohat Pallas Kohistan

Order No. 103/2022 / F.No. 103/2022 (M/Ext Promotion) (K) (K) Dated: 10/02/2022

Copy of the above is forwarded to the:
Deputy Commissioner Kohat Pallas Kohistan
District Accounts Officer Kohistan KP
Deputy District Education Officer (M) KP Kohistan

Attested
10/02-2022
(Signature)

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

NOTIFICATION

In compliance with the notification of Director Elementary and Secondary Education Khyber Pakhtunkhwa vide notification issued under endstt no no 5259.65. /FileNo 6/Promotion senior teacher /(BPS/16) Dated Peshawar 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 18910.1520.64510 plus 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 date of taking over charge.

ITEM No 01 : PROMOTION OF CT BPS 15 TO SENIOR CT BPS 16

S /	NAME	DESIGNATION	Name of present school	Name of posted school	remarks
1	Riaz ahmad	Ct BPS 15 to SCT BPS 16	GMS madakhil abad	Gms jaba madakhil	A.V. P
2	Muhammad Haq	Ct BPS 15 to SCT BPS 16	GMS mahreen kolai	GHSS Battira	A.V. P
3	Abdullah	Ct BPS 15 to SCT BPS 16	GMS shalkhan abad	GHS kuz paro	A.V. P

ITEM No 02 : PROMOTION OF DM BPS 15 TO SENIOR DM BPS 16

S /	NAME	DESIGNATION	Name of present school	Name of posted school	remarks
1	Fazal ur rehman	DM BPS 15 to S DM BPS 16	GMS Seer ber palas	GHSS Maidan kolai	A.V. P

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

S /	NAME	DESIGNATION	Name of present school	Name of posted school	remarks
1	Nosherwan	AT BPS 15 to SAT BPS 16	GMS madakhial abad	GhS kuz sheryal	A.V. P
2	Inayat ur rehman	AT BPS 15 to SAT BPS 16	GMS Mahreen koli	GHS Kharo gadar	A.V. P
3	ghulamullah	AT BPS 15 to SAT BPS 16	GMS jan bela	GHSS Battira	A.V. P

ITEM No 04 : PROMOTION OF TT BPS 15 TO SENIOR TT BPS 16

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

Accepted
10-07-2022
[Signature]

10-07-2022 [Signature]

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

S /	NAME	DESIGNATION	Name of present school	Name of posted school	remarks
1	Saif ul amin	PET BPS 15 to S PET BPS 16	GMS dil kadow	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 issued from time 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 misconduct they shall be proceeded under the rule framed from time to time.
4. Charge reports should be submitted to all concerned
5. Their inter se seniority on lower post will remain intact
6. No TA/DA is allowed.
7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in light of this order will be recovered and if they are wrongly promoted they will be reversed.
8. Before handing over charge their documents may be checked, if they have not the required relevant qualification as per rules, they may not be handed over charge of the post
9. All DDOs of higher secondary schools High schools are directed to check/ verify their BA degree and professional degree before drawal of their pay if any consequence made later on all DDOs will be held responsible

ENGLISH SIGNATURE OF

ZAHID HUSSAIN

DISTRICT EDUCATION OFFICER
Male Kolai Palas Kohistan

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

Attested
10-02-2022
[Signature]



OFFICE
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DISTRICT EDUCATION OFFICER
KOLAI PALLAS KOHISTAN
www.district-education-officer.gov.pk



NOTIFICATION

In compliance with the order of Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar vide Notification issued under No.2975-80/File No.178-promotion SST (BPS-16) District Peshawar the 08.12.2020, the following SCs and PSHTs (Male) promoted to the post of SST (General) in BPS-16 (Rs.18910-1520-64510) plus usual allowances or 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 immediate.

A. Promotion to SST (General)

ITEM No.1. PROMOTION OF SCT (Male) TO THE POST OF SST (G) BPS-16 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 % SCT/CT Quota to SST (G)	04
Posts available for Promotion to SST (G)	03
Proposed SCT for promotion to SST (G)	03

S#	Name of Official	Name of Present School	Date of Birth	Date of 1 st App: as Regular CT	Qualification	Name of Adjusted School	Remarks
01	Amanullah	GHS Sharokol	03-02-1979	05-12-2014	MA/M.ED	GMS Dal Sharokol	AVP
02	Muhammad Akbar	GHS Sharokol	12-03-1977	05-12-2014	MA/M.ED	GHS Sharokol	AVP
03	Shamsi Khan	GHS Daffaira	01-05-1974	30-07-2015	MA/M.ED	GMS Jan Bela Madakhall	AVP
04	Nowab Khan	GHS Para Garhi	10-04-1978	30-07-2015	MA/M.ED	GHS Para Garhi	AVP

ITEM No.2. PROMOTION OF PSHT (BPS-15) Male TO THE POST OF SST (G) BPS-16 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
20 % PSHT/SPST/PST Quota to SST (G)	02
Posts available for Promotion to SST (G)	02
Proposed PSHT for promotion to SST (G)	02

S#	Name of Official	Name of Present School	Date of Birth	Date of 1 st App: as Regular PST	Qualification	Name of Adjusted School	Remarks
01	Amalr Khan	GMS Bar Bara	07-01-1973	25-12-1993	BA/B.ED	GMS Bar Bara	AVP
02	Abdul Waheem	GMS Shum Jamal	05-09-1974	01-12-1994	BA/B.ED	GHS Khara Gardar	AVP

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 rules and regulations as may be issued from time to time by the Govt.

Attested
10-07-2022
[Signature]

(20) BETTER COPY

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

NOTIFICATION

In compliance with the order of Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar vide notification issued under NO .2975.80/FileNo.1/ Promotion SST (BPS.16) Dated Peshawar 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 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 immediate.

A.Pomotion to SST (General)

ITEM NO .1 PROMOTION OF SCT 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% SCT /CT Quota to SST(G)	04
Posts available for Promotion to SST(G)	04
Proposed SCT for promotion to SST(G)	04

S //	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 Madakhlal	AVP
04	Nawab khan	GHS Para Ghari	10.04.1978	30.07.2015	MA/M,ED	GHS Para Ghrhl	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 available for Promotion to SST(G)	02
Proposed PSHT for promotion to SST(G)	02

S //	Name of official	Name of Present School	Date of brith	Date of first App as Regular CT	Qualification	Name of adjusted school	Remarks
01	Amaiz khan	GPS Bar banda	07.01.1973	25.12.1993	BA/BED	GMS BAR sherval	AVP
02	Abdur rehman	GPS Shum Jumat	03.09.1974	01.12.1994		GHS Kharo Gadar	AVP

Terms and condition :

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

Attested
10-02-2022
JES



Directorate of Khyber

Primary and Secondary Education Khyber Pakhtunkhwa Peshawar

AMC

AMMUR (D)

Notification

Consequent upon the advertisement bearing No. JNF/P/019/20, and the recommendations of the Departmental Selection Committee, the following candidates are appointed to the post of SST (G) Male in BPS-16 (Rs 15500 - 18200) (BPS-16) fixed plus usual allowances as admissible under the rules on allow-
ment basis under the existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions as given below with immediate effect.

ITEM NO.1 APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

S. No.	Roll No.	Name	Enter Date	DOB	CMC	NTS Marks	Acad Marks	Total Score	School Place of Data
1	1000000000	Jan Muhammad	10/04/2000	10/04/2000	1000000000	81	27.12	108.12	Schools are placed at the disposal of DEO (M) Khyber Pakhtunkhwa
2	1000000000	Jan Muhammad	10/04/2000	10/04/2000	1000000000	59	21.43	80.43	Schools are placed at the disposal of DEO (M) Khyber Pakhtunkhwa
3	1000000000	Jan Muhammad	10/04/2000	10/04/2000	1000000000	62	20.26	82.26	Schools are placed at the disposal of DEO (M) Khyber Pakhtunkhwa

Terms and Conditions:-

- The DEO is directed to adjust/post the appointees against the schools/posts already advertised on the web-site of 175.
- No TADA is allowed.
- Charge reports should be submitted to AT concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year with immediate effect.
- They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to the Competent Authority.
- If any meritorious candidate is deprived of appointment by this order, and the Competent Authority accepts his appeal, the appointment order of the low merit candidate will be withdrawn, and the adjustment order will be released according to the merit.
- Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO (concerned). Anyone found producing bogus certificate will be reported to the law enforcing agencies for further action, and his appointment order shall be denotified from the date of its issuance.
- Their services are liable to termination on one month's notice from either side. In case of leaving the department without notice their one month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) to the effect that their certificates are verified and found correct and genuine.
- 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 expire automatically and no subsequent appeal shall be entertained.
- Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 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.
- 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.
- Before handing over charge, once again their documents may be checked by the Headmaster/Principal (concerned) and if they have not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post, and the case may be reported to the Directorate, ESSE, for withdrawal of order.
- The appointees shall take nine (09) months mandatory training at RITE or FITE.
- The DEO concerned is directed to verify the domicile namely, Jan Muhammad, at S No 3, in Item No 1 of the appointment of SST (G), of this order, from Deputy Commissioner concerned for its intaction. In case the domicile found fake, unverified or not intact, his appointment order will stand cancelled automatically.

(Hafiz Dr. Muhammad Ibrahim)

Director

Primary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encls: No 4579-86 File No: A-1 N.E. ACS, Appn. BPS-16/ dated Peshawar the 10.07.2022
Copy forwarded for information and necessary action to the
1. Assistant General M/S, Peshawar

Affected
10-07-2022
[Signature]

22

BETTER COPY

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWER.**

NOTIFICATION

Consequent upon the advertisement bearing no INF(P)19/20 and the recommendation of the Departmental selection Committee, the following candidates are appointed to the post of **SST GMale BPS 16 (Rs 1510.1520.64510) 1510 fix plus allowance and admissible under the rules on adhoc contract basis under the existing policy of the provincial government in teaching cadre on the terms and conditions given below with immediate effect**

**ITEM NO.1 APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE
BPS 16 ON ADHOC BASIS UNDER 25% OPEN QUOTA**

S	ROLL NO	NAME	FATHER NAME	DOB	CNIC	Nts marks	Acad mark	Total score	School place of disty
1	1540 0200	<i>Aziz ulhaq</i>	<i>Fuqra</i>	10.02.1 994	13402.4436 997.9	61	67.1 2	128. 12	Services are palced at the desposal of DEO Male kolyPalas Kohistan
2	2350 0548	<i>Hafiz fazalhaqhaq ani</i>	<i>Muhammad zurrar</i>	05.05.1 986	13402.9415 627.1	56	71.4 3	127. 43	Services are palced at the desposal of DEO Male kolyPalas Kohistan
3	1240 0469	<i>Jan Muhammad</i>	<i>Muhammad zareen khan</i>	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 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 the 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 checked 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 drawl of order.
15. The appointment shall take nine months mandatory training at RJTE 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

Attended
10-02-2022
[Signature]

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ANNEXURE (E)

B. Promotion : (G)

ITEM No 1 PROMOTION OF CT/SCT MALE TO TH BASIS

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

Total No of Vacant Post of SST(G)
25% Initial Recruitment Quota
75% Promotion Quota
40% CT/SCT Promotion Quota to SST(G)
20% PST/SPST /PSHT Promotion Quota to SST (G)
1% DM/SDM Promotion Quota to SST (G)
4% AT/SAT Promotion Quota to SST (G)
4% TE STT Promotion Quota to SST (G)
3% S Qan Promotion Quota to SST (G)
Already Promoted CT/SCT PST to SST (G)
Proposed for Promotion to SST (G)

Attested

10/02-2022

[Signature]

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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)

Attended
10-02-2022
[Signature]

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AMM
ANNA WRE (P)

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

NOTIFICATION

In compliance with the order of Director Elementary and Secondary Education Khyber Pakhtunkhawa vide notification issued under no 4579.36/File No 5/A.14/SST/Adhoc/Appointment/(BPS/16) Dated Peshawar 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 adhoc contract basis under the existing policy of the provincial government in teaching cadre. 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 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 fazalhaq aqani	Muham mad zurrar	05.0 5.19 86	13402.9415 627.1	56	71.4 3	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: these 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.
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
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 checked 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 draw of order.
15. The appointment shall take nine months mandatory training at RITE Or, PITE.

ENGLISH SIGNATURE OF
ZAHID HUSSAIN

DISTRICT EDUCATION OFFICER
Male Kolai Palas Kohistan

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

Attested
10-07-2022
[Signature]

26

**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 issued under no 4579.B6/File No 5/A.14/SST/Adhoc/Appointment/(BPS/16) Dated Peshawar 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 adhoc contract basis under the existing policy of the provincial government in teaching cadre. 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 suoud 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 a ver charge.
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 sastatisfactory
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 SIGNATURE OF

ZAHID HUSSAIN

DISTRICT EDUCATION OFFICER
Male Kolai Palas Kohistan

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

Attested
1992-2022
[Signature]

AMM
Annexure (G)

27

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


Sr	I/No.	Name of Teacher	Father Name	Designation	RPS	Academic Qualification	Professional Qualification	Date of Birth	Date of Ist App Govt. Service	Date of Entry in to Govt. Service	Date of App. as Trained/Regular on Present Post	Place of Posting	Domicile	CNIC No	Mobile
1	31000	TAJEER ULLAH	MUJIB KHAN	SS.TI	16	SSC	SA	06.06.1970	25.06.1992	26.06.1992	-	GHS BATAIFA	KOHISTAN	13503-0479751	-
2	370475	AZAL DAD	MUHAMMAD SADEED	SR.TI	16	SSC	SA	29.02.1981	01.12.2006	02.12.2006	-	GHS MAIDAN KOLAI	KOHISTAN	13403-0166754-3	9991-808-809
3	355045	FARHAT ULLAH	QALANBAR	SR.TI	16	SSC	S/ALM	31.12.1965	28.12.1994	29.12.1994	-	GHS PARA GARHI	KOHISTAN	13402-1154744-3	-
4	330336	ABDUL HAD	UMAR KHAN	SR.TI	16	SSC	JDP	15.12.1975	15.10.1996	16.10.1996	-	GHS KHARO GADAR	KOHISTAN	13501-2248270-5	0545-9605783
5	332718	UMMAH ULLAH	SHER AZAL	SR.TI	16	SSC	SA	01.01.1969	23.08.1997	24.02.1997	28.02.1997	GHS SHARAKCI	KOHISTAN	13402-1155354-3	0345-5649802
6	356028	FAROOB	ABEER AMAN	TI	15	-	SAHAD	1965	25.05.1993	26.05.1993	-	GMS MAHREEN KOLAI	KOHISTAN	13402-1155169-1	0344-1824120
7	335335	SAEED UR REHMAN	ISMAIL MALOOF	TI	15	-	S/ALM	01.01.1970	24.12.1995	25.12.1995	-	GMS PEELCH BELA	KOHISTAN	13402-1152631-4	-
8	325392	MUHAMMAD MARI	PIR DAD	TI	15	-	S/ALM	01.07.1970	24.12.1995	26.12.1995	-	GMS DILKANDOW	KOHISTAN	13402-1154515-1	-
9	340784	KHAN ZAMAN	HAJI MOHSIN	TI	15	-	S/ALM	1969	27.08.1997	23.08.1997	-	GMS SHALKHAN ABAD	KOHISTAN	13403-572156-4	-
10	335229	DIAR US SALAM	JAMDAR KHAN	TI	15	SSC	S/ALM	01.01.1981	05.04.1999	06.04.1999	-	GMS MADA KHAIL ABAD	KOHISTAN	15501-2263424-9	-
11	335268	ABDUL QAYUM	ASALM	TI	15	SSC	-	01.01.1974	13.08.1999	14.08.1999	-	GMS SHAMAL GALI	KOHISTAN	13403-9880849-5	0347-1853154
12	335226	BARAKAT ULLAH	SHEKH UL ISLAM	TI	15	-	S/ALM	01.07.1973	01.12.2006	04.12.2006	-	GMS SEEP BAR PALLAS	KOHISTAN	42101-6361296-1	-
13	403153	MUHAMMAD NASEEM	WANSPI	TI	15	-	PA	07.05.1985	28.06.2013	29.06.2013	-	GMS KOLAI	KOHISTAN	13201-0377266-1	-
14	725623	SARIMULLAH	AMIP HAMZA	TI	15	BA	S/ALM	20.05.1989	20.03.2015	21.03.2015	-	GMS BAR SHERIAL	KOHISTAN	42201-4980184-5	-
15	747604	SAIFUR REHMAN	MOULVI MAHMOOD	TI	15	BA	S/ALM	01.01.1981	20.03.2015	21.03.2015	-	GMS HUKAM ABAD	KOHISTAN	42201-4980184-5	-
16	744284	MOON UL ISLAM	NIMATULLAH	TI	15	BA	S/ALM	01.01.1981	20.03.2015	21.03.2015	-	GMS HUKAM ABAD	KOHISTAN	42201-4980184-5	-

DISTRICT EDUCATION OFFICER (M)
KOLAI PALLAS KOHISTAN

Attested
10-02-2022
[Signature]

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

S	P/NO	Name of teacher	Father name	Desi gniti on	BPS	*Acade mic quali fi cation	Profes sional quali fi cation	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	KOHISTAN	1340301667563
3	335245	Rahmatullah	Qalandar	STT	16	SSC	SA	31.12.65	28.12.94	GHS ParaGhrhi	KOHISTAN	13402.1154744.3
4	335396	Abdul haq	Umar khan	STT	16	SSC	SA	15.12.75	15.10.96	GHS KHaroGadar	KOHISTAN	13501.2248270.5
5	332718	Inayatllah	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	TT	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	TT	15	..	SA	1.7.70	24.12.95	GMS dilkando	KOHISTAN	1340301654431
10	335229	Daar us slam	Jamdar khan	TT	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	TT	15	SSC	SA	1.1.74	13.8.99	GMS ShamalGafi	KOHISTAN	15501.2283428.9
13	403153	Muhammad Naseem	manshi	TT	15	.	SA	1.7.73	1.12.06	GMS Seer bar palas	KOHISTAN	13403.9880849.9
14	705633	Kareemullah	Amir hamza	TT	15	Ba	SA	7.5.85	28.6.13	GMS koli	KOHISTAN	42101.8381296.1
15	747604	SaifUr Rehman	MaulviMehmood	TT	15	MA/ BED	SA	20.05.89	21.3.15	GMS Bar Sheryal	KOHISTAN	1320103772661
16	744288	Noor ulislam	Nimatullah	TT	15	BA	SA	1.1.81	21.3.15	GMS Hukumabad	KOHISTAN	4220149801849.5

Attested
10-07-2022


DE 11/12/20

CD

Allama Iqbal Open Un
Islamabad

Amma

2022 (H)
31/10



29

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.

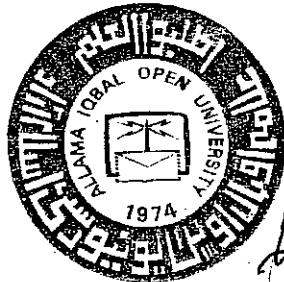
Attested
10-02-2022

CONTROLLER OF EXAMINATIONS

VICE-CHANCELLOR

Result declared on: October 12, 2021

Date of Issue: January 14, 2022



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

Serial No. 011217

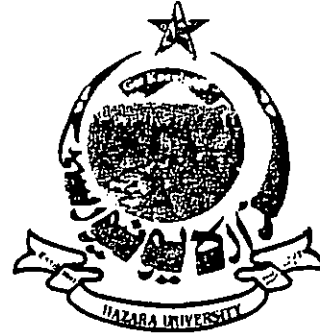
بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 14-PM-831

Roll No. 49154

HAZARA UNIVERSITY

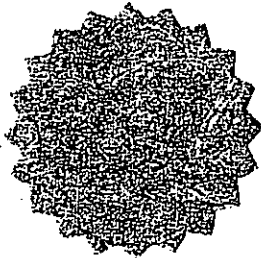
Mansehra, Pakistan

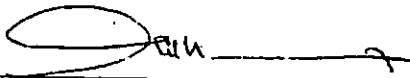


The University in recognition of the fulfilment of prescribed requirements has conferred upon
Mr / Ms Saif Ur Rehman Son / Daughter of Maulvi Mehmood

The Degree of **MASTER OF ARTS** in Islamiyat
in the examination held in August, 2017 session Annual 2017 (Private)

He / She was placed in First Division / Grade / CGPA.






Controller of Examinations

Date 13-Oct-2020



Registrar

Vice Chancellor

10-08-2022
Attested


20

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD



Serial No 828197

31

Roll No.

BF631469

Name SAIF UR REHMAN

Registration No.

15NKN00328

Final Semester

SPR-2016

Father's Name MAULVI MEHMOOD

Address C/O NADEEM OIL SHOP PROP. HAJI FAZAL REHMAN
P/O KOMILA

Tehsil DASU

District KOHISTAN



has successfully completed BACHELOR OF EDUCATION (B.ED)

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 15	0512	PERSPECTIVE OF EDUCATION	100	75
AUT- 15	0513	SCHOOL ORGANIZATION	100	84
AUT- 15	0514	EVALUATION, GUIDANCE & RESEARCH	100	64
AUT- 15	0518	EDUCATIONAL PSYCHOLOGY	100	72
AUT- 15	0651	ENGLISH (COMPULSORY)	100	63
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

Total Credits 6

Total Marks/Obtained 900 / 621

Result Declared on JANUARY 17, 2017

Percentage/Grade 69 / B

Date of Issue FEBRUARY 01, 2017

Mansoor

Controller of Examination

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.

*Attested
10-02-2022*

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ANNEXURE

AMM

His Excellency
Director General,
Elementary & Secondary Education,
KPK Peshawar.

Subject: Appeal (Regarding promotion from T.T to SST (G) against 4% Quota)

Most esteemed Sir,
I have the honour to lay down the following few lines for your very kind order please.

- 1) That I belong to an extremely backward area of District K. Pabla
- 2) That I appointed on 20.3.2015 as Theology Teacher.
- 3) That on 25.8.2020 D.E.O (M) office has asked us for submission of application for promotion purpose.
- 4) That amongst all the T.Ts, S.Ts, A.Ts, SATU Qaris & S.Os on Jam. MA. B Ed degree holder and fit for subjected purpose.
- 5) That the D.E.O (M) office deprived me to grant me promotion to SST (G) against 4% Quota with plea that we have no 4% seat on other hand a disable person appointed as CT against 2 Quota on total 29 sanctioned posts as photo copy attached.
- 6) That there are 41 total sanctioned posts for SST (G) among 1% seat is due for 4% Quota of T.Ts, S.Ts for promotion.

Keeping in view the above mentioned facts is therefore, appealed in your excellency that you may kindly issue order for implementation of the Theology Teacher 4% Quota for promotion to SST (G) with in the bounds of pure merit and Compassionate grounds. I shall be extremely grateful to

With profound regards!

Date 9.11.2020

Your Servant,

SAIF-UH-REHMAN
S/o Maulvi Mehboob
Theology Teacher at
Government Middle School, Borsher
District: K. Pabla

Shame
Quota

20/11/20
9/11/2020

Quota
is not available

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BETTER COPY

1

His Excellency

Director General

Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Subject : **APPEAL REGARDING PROMOTION FROM TT TO SST G
AGAINST 04% QUOTA**

Most esteemed sir ,

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

- 1) That I belonged an extremely backward area of district Koly Palas kohisatan
- 2) That I appointed on 20/03/2015 as thelogy 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 degre 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 thelogy teacher 4% quota for promotion to SST G with in the bounds of pure and compassionate grounds ,I shall be extremelygratefu! ful to you.

With profound regards.

Dated 09.11.2020

Your servant

Saifur Rehman S/O

Mualvi Mehmood

Thelogy Teacher at

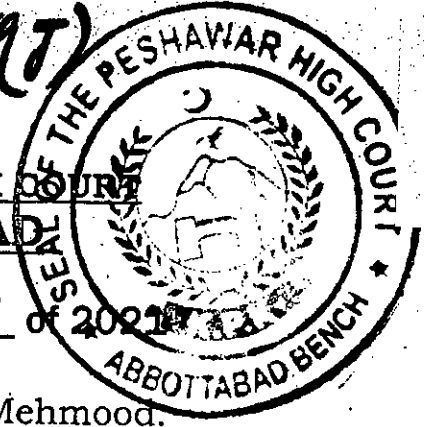
GMS bar Sheryal I

(34)

AMM (2022 J)

AMM

**BEFORE THE PESHAWAR HIGH COURT
BENCH ABBOTTABAD**



W.P. No. 1469 of 2021

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

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 THE
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.**

No. 7096
07-12-21

FILED
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
21/12/21

PRAYER: -

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

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EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Sec: 75 Evid Ordns.

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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.

Respectfully Sheweth!

1) That, the petitioner 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").

2) 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").

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

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EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Sec: 75 Evid Ordns.

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
R. M. M.

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

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

4) 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").

5) That, according to the existing policy 4% promotion quota to 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").

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

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EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Sec: 75 Evid Ordns.

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
9/1/22

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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 *inter-alia*, on the following amongst other grounds: -

GROUND: -

- 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.
- B) 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

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EXAMINER
31 JAN 2022
Peshawar High Court Ald. Bench
Authorized Under Se: 75 Evid Ordns

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ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
22/1/22

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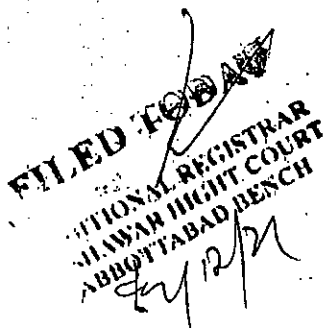
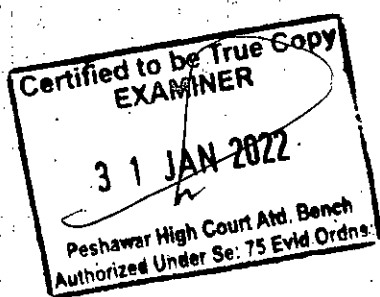
law the same is supposed to be declared as illegal and unconstitutional.

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.

E) 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.

G) 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



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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.
- I) That, the notices have been sent to all respondents through registered cover and proper court fee of Rs. 500/- has been affixed.
- J) That, any other ground will be raised at the time of argument with the prior permission of this Honourable Court.

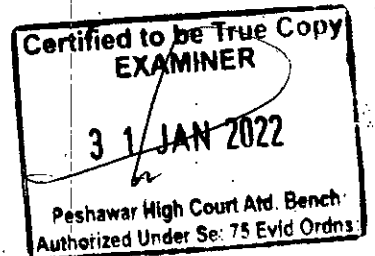
It is, therefore, most humbly prayed and requested that on acceptance of the instant writ petition that this Honourable Court may graciously be pleased to issue direction to the respondents to promote the petitioner against the post of SST(G) executive under the relevant rules or any other writ, order 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)



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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)

Certified to be True Copy
EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Sec: 75 Evid Ordns.

FILED
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH


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**BEFORE THE PESHAWAR HIGH COURT
BENCH ABBOTTABAD**

WP 1469/21

Saif-Ur-Rehman.....Petitioner

Versus

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

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.

[Signature]

SAIF-UR-REHMAN
(DEPONENT)

IDENTIFIED BY: -

[Signature]

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

13201-037766-1

AFFIDAVIT

S.No: 6660/86 Receipt No: 86

Certified that the above was verified on Solemn
affirmation At before me on this

6 day of Dec 2021, by
Saif ur Rehman son of Molvi Mehmood
R/o Teacher who was identified by school
WP & National Police who is personally known to me

Oath Commissioner
(Additional Registrar)
Peshawar High Court Abbottabad Bench

FILED FOR
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
[Signature]

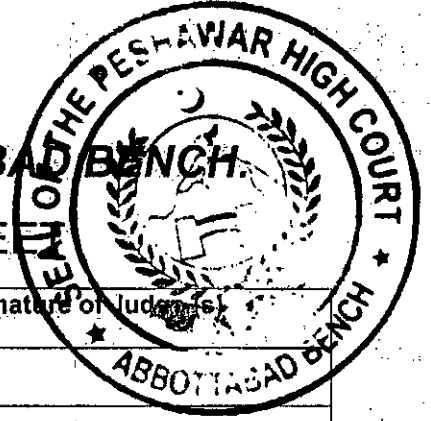
Certified to be True Copy
EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordna.

6/12/21

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PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s)
1	2
18.01.2022	<p><u>WP No. 1469-A/2021</u></p> <p>Present: Muhammad Tasleem Khan, Advocate, for the petitioner.</p> <p style="text-align: center;">***</p> <p><u>MOHAMMAD IBRAHIM KHAN, J.-</u> 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.</p> <p>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.</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p>

Certified to be True Copy
EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Sec. 75 Evid Ordna

DBAM No. 548

BC No. 15-5711

Name of Advocate محمد سلیم خان کلون

S.No

11022

Fee Rs. 100/-



2020-21

General Secretary
District Bar Association
Manshra

وکالت نامہ

بعدالت: جناب ضیور مختونخواں سروس ٹریبیونل بشاور

عنوان: سفیر الرحمن بنام: حکومت ضیور مختونخواں

منجاب: سائٹ Appellant نوعیت مقدمہ: سروس ٹریبیونل Promotion

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام..... بشاور..... کے لئے

محمد سلیم خان کلون ایڈووکیٹ ضیور مختونخواں

کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رد بروعدالت حاضر ہوتا رہوں گا اور بوقت پکارے

جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ

میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علاوہ

کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ پکھری کے علاوہ

کسی اور جگہ سماعت ہوا یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار

نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست

بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبیہ وصول

کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دثاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا

بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف

کر بشرط ادا ایسی علیحدہ محتاتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیر مشر کو

بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو

اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت

میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداخت وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

مورخہ 10 فروری 2022ء

ACCEPTED

سفیر الرحمن
ایڈووکیٹ
ضیور مختونخواں
بشاور

"A"

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

No. *Razaf*

TR A/A

APPEAL No. *202* of 20

Saif ur Rehman

Appellant/Petitioner

Versus

Through Secy. (ESSE) Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner *Counsel M. Tasleem Khan Kaloch*
(Advocate)

High Court DIST & Court At Mansehra

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8:00 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
At Abad.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. TB AIA

No. *Regd*

APPEAL No. *202* of 20

Saif ur Rehman

Appellant/Petitioner

Versus

Through Sayy (CESF) Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner *Saif ur Rehman s/o*
Molvi mehmoed STT Posted at
GHS Kuz Sharial Pallas DIST Kolai
Palas Kohistan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8.40 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
AIAbad.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No. *Razq*

TB A/A

APPEAL No. *202* of 20

Saif ur Rehman

Appellant/Petitioner

Versus

Through Secy. (CRSE) Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner *Counsel M. Tasleem Khan Kaka*
(Advocate)

High Court DIST. & COURT A Manshera

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *17-6-22* at *8:00 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/Abad*

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No. *1234*

TB A1A

APPEAL No. *202* of 20

Saif ur Rehman

Appellant/Petitioner

Versus

Through Sayy (ESSE) Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Saif ur Rehman S/O

Molvi mehmood STT Posted at

*GHS KU 2 Sharid Pallas Distt Kotai
Pallas Kohistan*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal

on *17-6-22* at *8:00 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
A1A bed.*

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.