

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD.**

Service Appeal No. 7810/2020

BEFORE: KALIM ARSHAD KHAN --- CHAIRMAN
FAREEHA PAUL --- MEMBER(E)

Naveed Iqbal S/o Ghulam Rabbani, Arabic Teacher, Government High School No.3 (English Medium), Abbottabad, resident of village Banda Khair Ali Khan post Office Dobather, Tehsil and District Abbottabad.

.....(*Appellant*)

VERSUS

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

Present:

NAVEED IQBAL

Appellant

--- In person.

SYED NASEER UD DIN,

Assistant Advocate General

--- For respondents.

Date of Institution.....14.07.2020

Date of Hearing.....19.05.2022

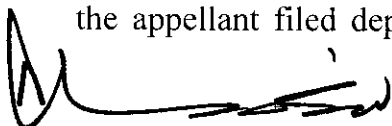
Date of Decision.....19.05.2022

JUDGEMENT.

KALIM ARSHAD KHAN, CHAIRMAN:- According to this service appeal instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 filed against impugned order dated 25.02.2020 issued under endorsement No. 2902-8, respondent No.2 had allegedly illegally deferred the appellant from promotion to the post of Arabic Teacher to Senior Arabic Teacher post, the said order

was said to be totally against the law, without jurisdiction malafide and issued on baseless facts.

02. It is alleged in the appeal that the appellant was appointed as Arabic Teacher (BS-09) on 05.04.1999, who assumed the charge on 10.04.1999 at Government Middle School Noor Mang, District Abbottabad. That on 18.11.1999, the appellant was promoted from BPS-09 to BPS-14 on the basis of prescribed qualification i.e. "Shahadat-UI-Almai" in the light notification dated 07.08.1991 issued by the provincial government. That later on, the post was upgraded to BPS-14 to BPS-15 and the post of the appellant was also upgraded to BPS-15 on 05.08.2006 in the light of notification dated 23.05.2006 issued by the Finance Department, Khyber Pakhtunkhwa Peshawar. That respondent No.3 prepared seniority list of all cadres including the Arabic Teachers in which the appellant was placed at serial No. 114 of the said seniority list. That the appellant was promoted from BPS-15 to BPs-16 on 01.05.2016 in the light of notification dated 30.06.2015 issued by the Finance Department Peshawar. That respondent No.3 issued a new seniority list on 31.12.2018 in which the appellant was placed at serial No.46. Thereafter on 11.11.2019 a meeting of the Departmental Promotion Committee was held in which the appellant was also included but respondent No.2 issued impugned promotion orders of Arabic Teacher and Senior Arabic Teacher on 25.02.2020 wherein the appellant was deferred and other teachers at serial No. 48,51 and 52 of the seniority list were promoted. Feeling aggrieved the appellant filed departmental appeal on 13.03.2020 to respondent



19/5/22

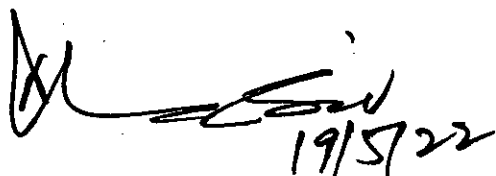
No.1 which was not responded within the statutory period, hence, the instant service appeal on 14.07.2020.

03. Notices were issued to the respondents who submitted written replies/comments and contested the appeal.

04. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

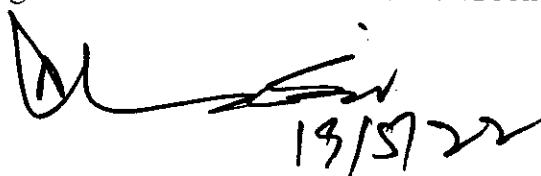
05. Appellant argued that he had not been treated according to the law and rules. That at the time of scrutiny, prior to promotion, if there was any objection/deficiency regarding the promotion/documents of appellant, they should have informed the appellant in written for removal of objection/deficiency and necessary entries in the service book is not the responsibility of the authority rather it should be done by the authority. He further contended that all the requirement of prescribed qualification for promotion were fulfilled but despite that the appellant was deferred from promotion which was against the norms of justice. Appellant concluded his arguments on the point that the impugned order dated 25.02.2020 was totally illegal, against the law and without lawful authority, hence, liable to be set aside.

06. Learned Assistant Advocate General on the other hand submitted that a meeting of Departmental Promotion Committee was convened on 11.11.019 for the purpose of promotion of Arabic Teacher to the posts of Senior Arabic Teacher and that the name of the


19/5/22

appellant was also included in the working paper however, he was deferred due to incomplete service book. He further contended that the appeal was not maintainable. He, therefore, requested for dismissal of the instant appeal.

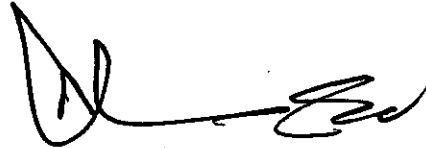
07. It appears from the undisputed record that the appellant was senior to one Qazi Muhammad Naeem as shown in the working paper, prepared for the meeting of the Departmental Promotion Committee to make promotion of four Arabic Teachers from BPS-15 to the post of Senior Arabic Teachers BPS-16 but in the column of eligibility the appellant was deferred and in the column of decision of the committee the reason was shown to be incomplete service book. Deferment from promotion is not a punishment rather a deficiency and on removal of such deficiency the one who is deferred from promotion had to be promoted from the date when his junior was promoted along with restoration of his actual seniority. It is also undisputed that the appellant was not superseded. So in a case of deferment when the reasons for deferment cease to exist the deferred officer is promoted from the date of deferment i.e. the date when his juniors were promoted and this is also provided as such in the promotion policy introduced by the Government of Khyber Pakhtunkhwa in 2009. As regards the reason that the service book of the appellant was incomplete that was a fact which apparently was beyond the control of the appellant as the service book is maintained and completed by the department/superiors and not by the officer himself. Vide notification bearing endorsement No.7389-98/EB-/Promotion/ SCT/ SDM/ SAT/


19/5/22

STT/ SPET dated 11.12.2020, though the appellant was promoted but with immediate effect whereas the department ought to have promoted the appellant from the date of deferment i.e. the date on which his juniors were promoted.

08. In the light of foregoing reason, the appeal in hand is accepted and the respondents are directed that the promotion of the appellant shall be given effect when his juniors were promoted to the post of Senior Arabic Teacher. He be also assigned the due place in seniority list. Costs shall follow the event. Consign.

09. *Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal this 19th day of May, 2022.*



(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD



(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

ORDER

19th May, 2022 Appellant in person present. Syed Naseer Ud Din, Assistant Advocate General for respondents present.

2. Vide our detailed judgement of today placed on file (containing 05pages), the appeal in hand is accepted and the respondents are directed that the promotion of the appellant shall be given effect when his juniors were promoted to the post of Senior Arabic Teacher. He be also assigned the due place in seniority list. Costs shall follow the event. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 19th day of May, 2022.*



(KALIM ARSHAD KHAN)
CHAIRMAN.
CAMP COURT ABBOTTABAD



(FAREEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

21.01.2022

Appellant in person present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

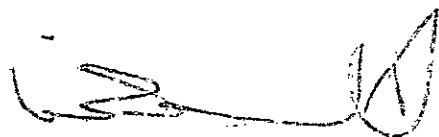
Appellant submitted rejoinder, copy of which is handed over to learned Additional Advocate General, who requested for adjournment on the ground that rejoinder has been submitted today, therefore, time may be granted to him for preparation for arguments. Adjourned. To come up for arguments on 17.02.2022 before the D.B at Camp Court Abbottabad.



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

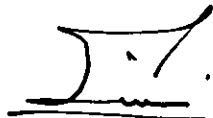


(Salah-ud-Din)
Member (J)
Camp Court A/Abad



21.09.2021

Appellant in person present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Usman Ghani, District Attorney for the respondents present and requested for adjournment for submission of reply/comments. Request is accorded with the directions to respondents to furnish reply/comments within 10 days. In case the respondents failed to submit reply/comments within stipulated time from today, they shall have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of reply/comments shall stand ceased. To come up for arguments before the D.B on 21.12.2021 at Camp Court Abbottabad.

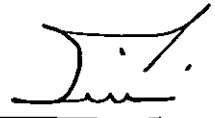


(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

21.12.2021

Appellant in person present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Joint para-wise reply on behalf of respondents No. 1 to 3 submitted, which is placed on file and copy of the same is handed over to appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 21.01.2022 before the D.B at Camp Court Abbottabad.



(Salah-ud-Din)
Member (J)
Camp Court A/Abad

(Sohail Ahmed Zeb)
Litigation Officer
Camp Court Abbottabad

15.01.2021

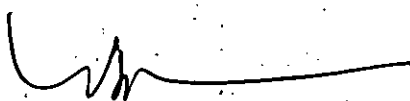
Due to COVID-19, the case is adjourned for the same on 16.02.2021 before D.B.


READER


15.02.2021

Learned counsel for the appellant and Mr. Riaz Khan Paindakhel learned Asst. AG alongwith Sohail Ahmed Zeb Litigation Officer for respondents present.

Representative of respondents requested for time to submit reply/comments. Granted. To come up for reply/comments on 20.04.2021 before S.B at Camp Court, A/Abad.


(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court, A/Abad

20-4-21. Due to COVID-19, case is adjourned to 21-9-2021 for the same.


Reader

20.11.2020

Mr. Naveed Iqbal is present in person. The sum total, of what has been agitated at the bar by the appellant himself, is that he stood senior to the officials entered at serial No. 48, 51, 52 who were promoted by deferment of his case without any reasonable and legal justification as he is senior to them being entered at serial no. 46 ibid on the pretext that his service book is incomplete. He emphasized that maintenance of service book and keeping it up to date, is the primary and rudimentary responsibility of the officials in whose custody it lies however, entries were left incomplete intentionally to keep his case at bay from those who were obviously juniors. In this regard he pointed out that his deferment was made outrightly without entry in the relevant column with entries in hand writing which speaks volume of malafide on their part. The working paper for the purpose was prepared on 11.11.2019, the impugned order was passed on 25.02.2020, the representation was made on 13.03.2020 whereas service appeal has been instituted on 14.07.2020 which is within time.

The points so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 18.01.2021 before S.B at Camp Court, Abbottabad.

Appellant has submitted application for suspension of the DPC dated 11.09.2020 by respondent No. 2 by restraining respondents to issue the promotion order approved in the above mentioned DPC. Accordingly, the proceedings made in the DPC held on the referred to date shall remain suspended to the extent of appellant.

(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD



Appellant Deposited
Security & Process Fee

+Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 7810 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/07/2020	<p>The appeal of Mr. Naveed Iqbal presented today by him may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench for preliminary hearing to be put up there on <u>20-11-20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL
CAMP COURT, ABBOTTABAD

Service Appeal No: _____ of 2020

Naveed Iqbal S/O Ghulam Rabbani, AT Teacher, Government High School No.3 (English Medium), Abbottabad, Resident of Village Banda Khair Ali Khan Post office Dobather, Tehsil and District Abbottabad, Mobile No. 0301-8135181

....APPELLANT

Versus


1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar. (091-5210480)
2. Director of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar. (091-9210389)
3. District Education Officer (Elementary & Secondary Education) (Male), Abbottabad. (0992-9310102)

....RESPONDENTS

SERVICE APPEAL
INDEX

S. No	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE NO
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3	Copy of Notification dated 23/05/2006	B	7
4	Copy of notification dated 11/07/2012	C	8-9
5	Copy of relevant page of seniority list of 2012	D	10
6	Copy of notification dated 30/06/2015	E	11-12
7	Copy of letter dated 30/05/2016 issued by Principal GHS No.3, Abbottabad.	F	13
8	Copy of relevant page of new seniority list dated 31/12/2018	G	14-15
9	Copy of working papers of DPC dated 11/11/2019	H	16
10	Copies of the impugned notification dated 25/02/2020 and adjustment order dated 06/03/2020	I	17-25
11	Copy of departmental appeal dated 13/03/2020	J	26
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Dated 11/07/2020


(Naveed Iqbal)
(appellant in person)

BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL**CAMP COURT ABBOTTABAD**Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7189

Service Appeal No: 7810 Dated: 14/07/2020
of 2020

Naveed Iqbal S/O Ghulam Rabbani, AT Teacher, Government High School.No.3
(English Medium), Abbottabad, Resident of Village Banda Khair Ali Khan Post
office Dobather, Tehsil and District Abbottabad. Cell No.0333-5059368

....APPELLANT

VERSUS

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

....RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST IMPUGNED ORDER DATED 25/02/2020 ISSUED UNDER ENDORSEMENT NO. 2902-8 WHEREBY RESPONDENT NO. 2 ILLEGALLY DIFFERED THE APPELLANT FROM PROMOTION OF A.T TO SAT POST, THE SAID ORDER IS TOTALLY AGAINST THE LAW, WITHOUT JURISDICTION MALAFIDY AND ISSUED ON BASELESS FACTS.

Filed to-day

Registrar

14/7/20

PRAYER:

IT IS THEREFORE, RESPECTFULLY PRAYED THAT ON ACCEPTANCE OF THE INSTANT APPEAL, THE IMPUGNED NOTIFICATION DATED 25/02/2020 MAY KINDLY BE SET ASIDE / MODIFIED AND THE APPELLANT MAY KINDLY BE PROMOTED W.E.F. 25/02/2020 WITH ALL BACK BENEFITS.

Respectfully Sheweth,

FACTS

1. That, Appellant was appointed as a "Arabic Teacher" (A.T) in BPS-09 on 05/04/1999 and took over the charge on 10/04/1999 at GMS Noor Mang, District Abbottabad. **(Copy of first appointment order dated 05/04/1999 is attached as Annexure "A")**
2. That, on 18/11/1999, appellant was promoted from BPS-09 to BPS-14 at the basis of prescribed qualification i.e. "Shahadat-Ul-Almia" in the light of Notification dated 07/08/1991 issued by Government of (NWFP) KPK.
3. That, the post of Arabic Teacher was up-graded from BPS-14 to BPS-15 due to which the appellant was again promoted from BPS-14 to BPS-15 on 05/08/2006 in the light of Notification dated 23/05/2006 issued by Finance Department KPK, Peshawar. **(Copy of Notification dated 23/05/2006 is annexed as Annexure "B")**
4. That, on 11/07/2012, Respondent No.1, issued a Notification for promotion of 1/3 teachers of every cadre to next higher scale at the basis of prescribed qualification / seniority cum fitness. **(Copy of notification dated 11/07/2012 is attached as Annexure "C")**
5. That, in the light of above said Notification dated 11/07/2012, Respondent No.3 prepared seniority list of all cadres including Arabic Teachers in the month of Dec:2012, in which, the appellant was placed at Sr. No. 114 and, thus, the appellant qualified for promotion to next higher scale. **(Copy of relevant page of seniority list is attached as Annexure " D")**
6. That, on 30/06/2015, Finance Department Government of KPK, issued a notification that all the government employees who have not been promoted or have not been granted special allowance w.e.f 01/07/2010, are eligible for one-step promotion, the relevant Para of which is as under:-

" That all provincial government employees who have been upgraded en-block or individually in last five years starting from 01/07/2010 or have been granted special allowance / pay equal to 40% or more of their normal pay, shall not be entitled for the instant up-gradation"

(Copy of notification dated 30/06/2015 is attached as Annexure "E")
7. That, Appellant was promoted from BPS-15 to BPS-16 on 01/05/2016 (one Step Promotion) in the light of Notification dated 30/06/2015 issued by Finance Department KPK Peshawar, and, appellant was also granted a one pre-mature increment in the light of the notification dated 30/05/2014 issued by Finance Department KPK, Peshawar and, the than DDO (Principal GHS No.3, Abbottabad) made all the entries in the service book of appellant w.e.f.

23/05/2006 to till yet and the promotion case of appellant was referred to the District Comptroller of Accounts Abbottabad which was accepted and, thus, the original service of appellant was taken in to the custody of District Accounts office Abbottabad due to the gazetted post of appellant. **(Copy of letter dated 30/05/2016 is attached as Annexure "F")**

8. That, Respondent No.3 issued a new seniority list on 31/12/2018 in which the appellant was place at seniority list No.46. **(Copy of relevant page of new seniority list dated 31/12/2018 is attached as Annexure "G")**
9. That, on 11/11/2019, a meeting of DPC was held in which the Principal of the school of appellant (Principal GHS No.3, Abbottabad) furnished the complete file of appellant to respondent No.3 alongwith other relevant documents for the promotion of appellant from A.T to SAT post. **(Copy of working papers of DPC dated 11/11/2019 is attached as Annexure "H")**
10. That, on 25/02/2020, Respondent No.2, issued the impugned promotion orders of A.T to SAT posts and the teachers having Seniority list No.48,51 and 52 was promoted but the name of appellant was differed although the name of appellant was mentioned at Seniority list No. 46, which shows clear cut malafide on the part of respondents No.2 &3 and, on 06/03/2020, Respondent No.3 issued Adjustment order. **(Copies of the impugned notification dated 25/02/2020 and adjustment order dated 06/03/2020 are annexed as Annexure "I")**
11. That on 13/03/2020, appellant filed a departmental appeal before Respondent No.1 against the impugned notification dated 25/02/2020 which is still pending. **(Copy of departmental Appeal is attached as Annexure "J")**
12. That, the appellant assails the impugned order dated 25/02/2020 on the following amongst other grounds:-


GROUND:

- a. That, at the time of scrutiny, prior to promotion, if there was any objection/deficiency regarding the promotion / documents of appellant, then why the appellant was not informed in written to remove the objection/deficiency or to submit the requisite document.
- b. That, to complete the service book of appellant is not the responsibility of appellant.
- c. That, after 30/05/2016 the original Service Book of appellant alongwith completed file was taken in to the custody of District Comptroller of Account, Abbottabad.

- d. That, according to the DPC working papers, it is apparent that at the basis of personal grudges, appellant was deliberately deprived of from his legal right of promotion from A.T to S.A.T post.
- e. That, there was no such kind of order issued by the competent or Hire authority due to which the promotion of appellant was liable to be stopped.
- f. That, respondent No.3 intentionally make cutting in the already verified service of the appellant at page-13 of the original service book of the appellant. **(Copy of the relevant page of service book is attached as Annexure "K")**
- g. That, respondent No.3 by himself differed the appellant from promotion which was not in the jurisdiction of respondent No.3 and, thus, respondent No.3 exceeded his power.
- h. That, the appellant fulfills the requirement of prescribed qualification but inspite of that the appellant was differed from promotion only to mentally torture the appellant. **(Copies of the documents regarding prescribed qualification of appellant, are attached as Annexure "L")**
- i. That, the impugned dated 25/02/2020 is totally illegal, against the law, without jurisdiction and without lawful authority hence, liable to be set-aside.
- j. That, the instant appeal is well within time.
- k. That, the other point shall be raised at the time of argument with the prior permission of Hon'ble Tribunal.

It is therefore, respectfully prayed that the instant appeal may graciously be accepted, and impugned Notification dated 25/02/2020 may kindly be set aside / modified and the appellant may kindly be promoted w.e.f. 25/02/2020 with all back benefits. Any other relief for which the appellant is entitled and same is not asked/prayed specifically, may kindly be granted in the favour of the Appellant too.

Dated 11/07/2020


(Naveed Iqbal)
(Appellant Inperson)

AFFIDAVIT:

I, Naveed Iqbal S/O Ghulam Rabbani, AT Teacher, Government High School No.3 (English Medium), Tehsil & District Abbottabad, Resident of Banda Khair Ali Khan Post office Dobather, Tehsil and District Abbottabad, Appellant, do hereby affirm on oath that contents of instant appeal are correct and true to the best of my knowledge and belief and nothing has been suppressed from this Honourable Tribunal and instant appeal is first appeal and same nature of any other appeal is not pending before this Honourable Tribunal.

Dated 11/07/2020


DEPONENT

(5)

A

OFFICE OF THE DISTRICT EDUCATION OFFICER SECONDARY (MALE) ABBOTTABAD

OFFICE ORDER NO. 51/AE-I/ATS

Dated A'Abad the 5/4/1999

APPOINTMENT.

Consequent upon the approval of Selection Committee and qualifying the prescribed test/interview, the following candidates are hereby appointed on the post of Arabic teachers in EPS-9 @ Rs. 1605-97-3060/- P.M plus usual allowances as admissible to them under the rules in the school mentioned against each their names below with effect from the date of their taking over charge on the following terms and conditions.

S.No.	Name/Father's name and address of candidates	Marks obtained	Name of school where appointed	REMARKS.
1.	Abdul-Razzaq S/O Abdul Sattar R/O Keri Sarafali	55.31	GMS Marri	Ag: Vacant post
2.	Naveed Iqbal S/O Ghulam Rabbani R/O B. Khair Ali Khan	54.15	GMS Noormong	Ag: N.C Post
3.	Inhamur Rehman S/O Saifur Rehman R/O Beerangali	52.46	" Ali Abad	Ag: Vacant post
4.	Mohd Abu Bakar S/O Muhammad Saleem R/O Tajwal	48.40	" Malkote	--do--
5.	Muhd Safir S/O Maqboolur Rehman TT GMS Kanthiali	46.40	" Khukhriala	--do--
6.	Muhammad Hanif S/O Muhd Miskeen R/O Seer Charbi	41.85	GMS Seer	--do--
7.	Muhammad Tahir S/O Abdul Khayee R/O Pattan Kalan	39.06	GMS Beri Bagla	--do--
8.	Shahab-ud-Din S/O Abdul Qayyum R/O Tarruch Bazar A'Abad	37.79	" Taroor	--do--
9.	Q. Mohd Tayyub S/O Q. Muhd Yaqub R/O Moh: Musa Zai Nawanshehr	35.93	" Sangrary	--do--
10.	Shaukat Hussain S/O Abdul Haq TT GMS Khukhriala	35.63	" Rankote	--do--
11.	Abdul Wajid S/O Muhammad Anwar R/O B. Khair Ali Khan	33.59	GMS Ziarat Masoom	--do--

CONDITIONS:-

1. Their appointments are purely on temporarily basis and liable to termination at any time without notice or assigning reason.
2. They will have to produce age and health certificate from the M/S DHQ Hospital Abbottabad.
3. The Head of institutions is required to check all the certificate in original before handing over charge to them.
4. In case they wish to resign from service, they will have to give one month's prior notice or forfeit one month's pay in lieu of short notice.
5. The Head of institution are further required to verify the original certificates from concerned Board/University before the draw of pay.
6. They should not handed over charge, if their age exceed 33 years or below 18 years.

Contd: on page/2.

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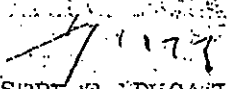
- 7. Appointment shall stand automatically cancelled if they failed to joining the post within ^{5 days} ~~one month~~ of the issue of this order.
- 8. Efforts for transfer before the completion of tenure will be disqualify him from the service.
- 9. They will be governed by such rules and regulation as prescribed by the Government from time to time for the category of Govt servant to which they belong.

(SYED BASHIR HUSSAIN SHAN)
 DISTRICT EDUCATION OFFICER (S-M)
 ABBOTTABAD.

Undst:No. 3059-86 / AE-I/ATS/A&T dated Abbottabad the 05/04 /1999

Copy to the:-

- 1. Director Secondary Education N.W.P.P. Peshawar.
- 2. District Accounts Officer Abbottabad.
- 3. ADEO (Accounts) local office.
- 4-6. Headmaster Government High School Ziarat Masoom and Seer-Abbottabad.
- 7-96. Headmaster Government Middle School Marri, Noormong, Ali Abad, Malkote, Khukhrialala, Beri Bagla, Taroor, Sangrany and Rankote-Abbottabad.
- 17-28. All concerned candidates.


 DISTRICT EDUCATION OFFICER (S-M)
 ABBOTTABAD.

S/...



①

ANNEXURE

GOVERNMENT OF N.W.F.P
FINANCE DEPARTMENT ^{B.}

NO.FD(SR.I)6-4/2005

Dated Peshawar the, May 23, 2006.

From :- The Secretary to Govt.of NWFP,
Finance Department.

To

1. The Secretary to Govt.of NWFP,
Schools & Literacy Department.
2. The Secretary to Chief Minister,
NWFP.
3. The Accountant General,
NWFP.
4. All District/Agency Accounts Officers,
NWFP.

SUBJECT:- GRANT OF PAY SCALE 15 TO ARABIC TEACHERS AND 14 TO
THEOLOGY TEACHERS.

Dear Sir,

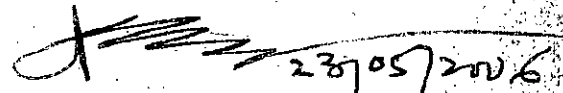
I am directed to refer the subject noted above and to state that the Chief Minister NWFP has been pleased to allow the following Pay Scales to the Arabic and Theology Teachers, who possess or acquires the following qualifications on or after the date of issue of this circular:-

S. No.	Designation/ Existing Pay Scale	Qualification	Revised Pay Scale
1.	Arabic Teacher BPS-9	<ol style="list-style-type: none"> i. SSC with Shahdatul Alamia Fil- Uloomul-Arabia Wal Islamia at least 2nd Division from Tanzimatul- Wafaqaul Madaris; OR ii. MA (Arabic) at least 2nd Division from a recognized University 	15
2.	Theology Teacher BPS-7	<ol style="list-style-type: none"> i. SSC with Shahdatul Aalia at least 2nd Division from anyone of the recognized Tanzimatul- Wafaqaul Madaris ; OR ii. BA 2nd Division with Islamic Studies and Arabic and Shahdatul Khasa from anyone of a recognized Tanzematul Wafaqaul Madaris 	14

2. This order shall take immediate effect.

Yours faithfully

ATTESTED


(AURANGZEB JADOON)
SECTION OFFICER (SR.I)

(8)

Nuzhat Ahmad
Siddiqui = 0333 5079597



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar, 11.07.2012.

NOTIFICATION:

No. SO (B & A)/1-18/E&SE/2012: Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Sr. No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/ Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	20,804 posts of the existing PSTs (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School.	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	one thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

M.A. Siddiqui

12.	Physical Education Teachers (PET's)	"do"	BS-09	(BPS-15)	All the existing posts of PET's are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
			BS-10		
			BS-12		
			BS-14		
			BS-15		
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qarin	"do"	DPS-7	(BPS-12)	All the existing posts of Qari/Qarin are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
			BPS-9		
			BPS-10		
			BPS-12		
			BPS-14		
15.	Sr.Qari/Sr.Qarin	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qarin posts are upgraded to BPS-15 and redesignated as Senior Qari/Qarin, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07/2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers

SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

(NOOR ALAM KHAN WAZIR)
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

S.No	Name of Teacher	Father's Name	School name	Domicile	BPS	Qualification		Date of Passing Professional Qualification	DOB	D/O Ist Appt:	D/O Appt: In Present Post	D/O T/O charge against the present post as untrained if so	D/O T/O in this district (after 2001)	Remarks	Fit for promotion as per new recruitment /promotion rules
						Date of passing highest Academic qualification with date of result	Professional Qualification								
1	3	4	2	5	6	7	8	9	10	11	12	13	14	15	16
97	Muhammad IRSHAD	Muhammad GULZAR	GHS Jhfar	A.Abad	15	SSC	Almia	1997	5-Feb-65	06.11.1988 as Qari	1-Jul-97			original sanad required(Almia Mardan)	YES
98	Muhammad Asif	Mir Muhammad	GHS Sherwan	A.Abad	15	FA	Arabic Hons	03.12.1996	14-Mar-75	8-Jul-97	8-Jul-97			checked from photo copy	NO
99	MUHMAD SABIR	ALI ZAMAN	GHS Namli Maira	A.Abad	9	FA	Almia	17.11.2007	27-Jan-78	25-Jul-97	25-Jul-97				YES
100	M Arshad Khan	Muhammad Iqbal	GHS Manjia	A.Abad	15	MA (Isl) / 10.10.1997	Almia / BEd	1992 / 2004	20-Jan-74	5-Mar-98	5-Mar-98				YES
101	ABDUL MANAN	M. SULEMAN	GMS Ghor	A.Abad	15	FA	Almia	14.01.1996	5-May-71	7-Mar-98	7-Mar-98				YES
102	IHZAZ ALI QURESHI	Abdul Majeed Qurashi	GHS Chammad	A.Abad	15	SSC	Almia	1993	30-Mar-71	9-Mar-98	9-Mar-98			checked from photo copy	YES
103	MUJIB AHMED	Qazi MATI UR REHMAN	GMS DEEDAL	A.Abad	15	MA (Isl)	Almia / B.Ed	1996 /	15-Mar-69	13-Mar-98	13-Mar-98			MA (Isl), B.Ed entries not signed / recorded in SB	YES
104	Hafiz ABDUL RASHID	Muhammad AKARAM	GMS Marda	A.Abad	15	SSC	Almia	1993	4-Apr-63	15-Jun-98	15-Jun-98				YES
105	ABDUR RAZAQ	Qazi MATI UR REHMAN	GMS ANDER SARI	A.Abad	15	SSC	Almia	24.03.1996	12-Jan-73	15-Jun-98	15-Jun-98				YES
106	Muhammad Zaheer	Muhammad Hassan	GHS Rajoya	A.Abad	15	SSC	sanad shah required	??	12.12.1958	19.10.1988	19/10/1998			sanad shahda required	NO
107	MUHMAD HANEEF	MUHMAD MISKEEN	GHS Seer	A.Abad	15	SSC	Almia	14/01/1996	21-May-73	5-Apr-99	5-Apr-99				YES
108	Mmuhammad Tahir	ABDUL HAYEE	GMS Beri Bagla	A.Abad	15	SSC	Almia	03.01.1997	14-Jan-71	6-Apr-99	6-Apr-99				YES
109	M Safer	Maqbool ur Rehman	GMS Khukhriala	A.Abad	15	MA (Isl) / 31.04.2004 B.Ed/12.08.2002	Almia	17.03.1997	20-Feb-73	01.03.1998	6-Apr-99			Ist Appt: TT	YES
110	SHOUKAT HUSSAIN	ABDUL HAQ	GHS Chamhalli	A.Abad	15	SSC	Almia	07.03.1998	1-May-75	28.02.1998	6-Apr-99			Ist Appt: TT	YES
111	INAM UR REHMAN	Molvi SAIF UR REHMAN	GMS LOONGAL	A.Abad	15		Almia	07.03.1998	25-Dec-74	8-Apr-99	8-Apr-99				NO
112	Muhammad ABU BAKAR	Muhammad SALIM KHAN	GHSS Tajwal	A.Abad	15	SSC	Almia	21.02.1998	23-Apr-72	9-Apr-99	9-Apr-99				YES
113	ABDUL RAZAQ	ABDUL SATTAR	GHS Zairat Masoom	A.Abad	15	SSC	Almia	15.03.1998	4-Oct-76	9-Apr-99	9-Apr-99				YES
114	Naveed Iqbal	GHULAM RABANI	GMS Todu Maira	A.Abad	15	MA (Arb) / 16.01.2012	Almia/ B.Ed (ARB)	14.01.1996 / 25.01.2007	19-Apr-75	10-Apr-99	10-Apr-99				Yes
115	Qazi Muhammad TAYYAB	Qazi Muhammad YAQOUB	GHSS Nawanshehr	A.Abad	15	SSC	ALMIA.	14.01.1996	25-May-67	15-Apr-99	15-Apr-99				YES
116	NADEEM GUL	ABDUR RASHID	GHS Lakhala	A.Abad	15	FA	Almia		2-Jun-73	10-Apr-99	1-Mar-00			Provide orig All documents	NO
117	MUHMAD NAWAZ	MIRDAZ KHAN	GHS Hamo (Azizabad)	A.Abad	15	SSC	Almia	10.03.1997	3-Feb-68	1-Mar-00	1-Mar-00				YES
118	MUHMAD FAROOQ	MUHMAD SADIQ	GHS Ghora Baz Garan	A.Abad	15	SSC	Almia	08.02.1999	19-Feb-75	1-Mar-00	1-Mar-00				YES
119	Muhammad AZAD	Miskeen Khan	GMS Keri Sarafali	A.Abad	15	FA	Almia	15.03.1998	6-Oct-77	1-Mar-00	1-Mar-00				YES
120	MUNEEB UR REHMAN	Molvi AZIZ UR REHMAN	GMS MAIRA MONDROCH	A.Abad	15	SSC	Almia	01.12.1997	12-Apr-79	07.04.199 as TT	1-Mar-00				YES



**GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)**

Dated Peshawar, the 30-06-2015

NOTIFICATION

NO.FD/SO(FR)7-20/2015 The competent authority has been pleased to accord approval to the upgradation of pay scales of the following provincial government employees with effect from 01-07-2015:

- a) Two pay scale upgradation will be allowed to all provincial government employees from BS-01 to BS-05.
 - b) One pay scale upgradation will be allowed to all provincial government employees from BS-06 to BS-15
 - c) Special Compensatory Allowance equal to difference of notional upgradation of BS-16 to BS-17 will be allowed to all provincial government employees in BS-16 in lieu of upgradation.
 - d) Upgradation will be applicable to both pay and allowances with freezing limits and other conditions currently in vogue unless revised by the government.
 - e) Pay fixation on upgradation will be applicable w.e.f. 01-07-2015 or 01-12-2015 on the option to be given by the concerned employee.
 - f) All provincial government employees who have been upgraded en-block or individually in last five years starting from 01-07-2010 or have been granted special allowance / pay equal to 40 % or more of their normal pay shall not be entitled for the instant upgradation.
2. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.
 3. All the concerned Departments will amend their respective service rules to the same effect in the prescribed manner.
 4. The above upgradation scheme shall not be applicable to employees of Autonomous Bodies, Semi Autonomous Bodies and Public Sector Companies.
 5. Explanatory note and subsidiary instructions on the subject will be issued separately.

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT**

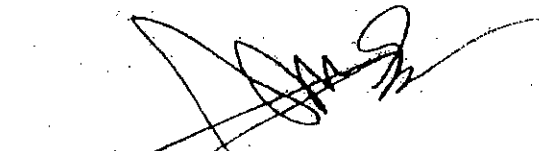
TESTED

[Handwritten signature]

Endst No. & Date even.

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

- 1) PS to Additional Chief Secretary, FATA.
- 2) All Administrative Secretaries Government of Khyber Pakhtunkhwa.
- 3) Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
- 4) Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 5) Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
- 6) Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 7) Secretary Provincial Assembly, Khyber Pakhtunkhwa.
- 8) All Heads of Attached Departments in Khyber Pakhtunkhwa.
- 9) Registrar, Peshawar High Court, Peshawar.
- 10) All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers Khyber Pakhtunkhwa.
- 11) Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
- 12) Registrar, Service Tribunal Khyber Pakhtunkhwa.
- 13) Secretary to Govt. of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
- 14) The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and Dir Khan.
- 15) The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Mansehra and Dir Lower.
- 16) The Treasury Officer, Peshawar.
- 17) All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
- 18) PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
- 19) PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 20) Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
- 21) PS to Finance Secretary.
- 22) PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department.
- 23) All Section Officers/Budget Officers in Finance Department.
- 24) Mr. Jabir Hussain Bangash, President, Class-IV Association, Civil Secretariat, Khyber Pakhtunkhwa Peshawar.
- 25) Mr. Manzoor Khan, President, Civil Secretariat Driver Association Khyber Pakhtunkhwa, Peshawar.
- 26) Mr. Akbar Khan Mohmand, Provincial President, Class-IV Association, Khyber Pakhtunkhwa, Peshawar.


(MURAD AHMED)
SECTION OFFICER (FR)

TESTED


13

**OFFICE OF THE PRINCIPAL, GOVERNMENT HIGH SCHOOL
NO.3, (ENGLISH MEDIUM) ABBOTTABAD.**

ANNEXURE

P: NO-13475

No. 278
Dated: 30/5/2016

"F"

To,

The District Account Officer,
Abbottabad.

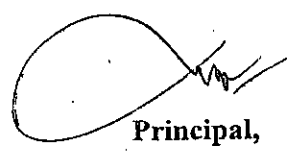
SUBJECT: UPGRADATION FROM BPS-15 TO BPS-16:

Respected Sir,

1. That, Mr. Naveed Iqbal, A.T Teacher (BPS-15) presently posted at the undersigned's School.
2. That, the Finance Department, Khyber Pakhtunkhwa, Peshawar vide Notification No.FD/SO(FR)7-20/ 2015 dated 30-06-2015 has approved the upgradation from BPS-01 to BPS-05 two step and BPS-06 to BPS-15 one step and the above named teacher is entitled for the same.
3. That, the mater of upgradation as notified in above said notification is required to be proceeded by your good office. Moreover, the above named teacher did not receive any promotion w.e.f 01-07-2010 hence he is entitled for the upgradation under the above mentioned notification.

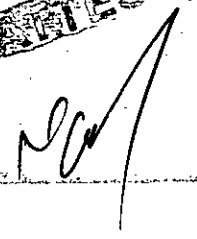
(Original service book LPC and copies of notifications, are attached herewith)

It is, therefore, requested that above named teacher may please be upgraded from BPS-15 to BPS-16 and obliged w.e.f 01.07.2015.



Principal,
G.H.S No.3, (EM)
Abbottabad.

ARTESSED



(14)
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD
FINAL SENIORITY LIST OF THE ARABIC TEACHERS B-15 DISTRICT ABBOTTABAD (31-12-2018)

S.No	Name of Teacher	Father's Name	School name	Domicile	BPS	Qualification			Date of Passing Professional Qualification	DOB	D/O Ist Apptt:	D/O Apptt: In Present Post	D/O T/O charge against the present post as untrained if so	D/O REGULARIZATION	
						Date of passing highest Academic qualification with date of result	Subject in BA/BSc	Minimum Required with Division							Professional Qualification
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	SIDDIQ UR REHMAN	HABIB UR REHMAN	GHS No.3 A/Abad	A.Abad	15	Under Primary			Almia	22.11.1992	1-Dec-62	23-Jun-85	23-Jun-85		
2	ABDUL SABOOKH	M YAQUB	GHSS Khanisapur	A.Abad	15	SSC		SSC	S.Almia	14 Rajab 1405/ 1979	18-Jun-60	12-May-83	16-Dec-85		
3	NAZIR AHMED Qurashi	ABDUL RASHID	GHS Nambal	A.Abad	15	SSC		3 rd	Almia	sanad required	15-Nov-61	12-Mar-86	12-Mar-86		
4	OBAID UR REHMAN	SAIF UR REHMAN	a	A.Abad	15	SSC			Almia	15.06.1987	13-Feb-68	10-Nov-87	10-Nov-87		
5	ABDUL QAYYUM	KHUSHAL	GMS Banda Lamba	Mansehra	15	MA (Arb) / 3rd / 05.12.1998	Arts	non Matric	Almia	10.07.1988	1-Jul-64	6-Apr-88	6-Apr-88		
6	ABDUL QADOOS	Mir Alam	GMS Choona Kari	A.Abad	15	SSC			Almia	15.06.1987	15-Apr-69	7-Apr-88	7-Apr-88		
7	ABDUL QADOOS	Hameedullah Mian	GMS Maira R.Khan	A.Abad	15	SSC		SSC 3rd	Almia	15.06.1987	19-Aug-68	14-Apr-88	14-Apr-88		
8	SYED HADYAT ULLAH SHAH	AHMAD JEE	GHS Pawa	Batgram	15	SSC		SSC 2nd	Almia	10.10.1987	1-Jan-67	28-Nov-88	28-Nov-88		
9	ABDUL QADEER	BALA KHAN	GMS Chunali	A.Abad	15	SSC		SSC 3rd	Almia	05.09.2011	3-Apr-63	1-Nov-89	1-Nov-89		
10	S MEHBOOB HUSSAIN SHAH	S QUDRAT SHAH	GMS Gali Banian	A.Abad	15	SSC		SSC 3rd	Almia	24.05.1990	10-Aug-65	1-Nov-89	1-Nov-89		
11	MEHRAJ AHMED	MUHAMMAD HAROON	GMS Banda Lamba	Battgram	15				Almia	29.09.1988	15-Feb-62	14-Mar-90	14-Mar-90		
12	ABDUL WAHEED	ABDUL HAMEED	GMS Nara	A.Abad	15	SSC			S.Almia	05.10.1987	1-Apr-68	22-Dec-90	22-Dec-90		
13	M. YAYA KHAN	Muhammad Aslam Khan	GMS Saihad	A.Abad	15	MA (Arab)	Arts	SSC 3rd	S. Almia	04.05.1991	4-Jan-70	16-May-92	16-May-92		

ANNEXURE

39

District Education Officer (Male) Abbottabad

ATTESTED
Muhammad

S. No	Name of Teacher	Father's Name	School name	Domicile	BPS	Qualification				Date of Passing Professional Qualification	DOB	D/O Ist Apptt:	D/O Apptt: In Present Post	D/O T/O charge against the present post as untrained if so	D/O REGISTRATION
						Date of passing highest Academic qualification with date of result	Subject in BA/BSc	Minimum Required with Division	Professional Qualification						
40	Mmuhammad Tahir	ABDUL HAYEE	GMS Salol Bandi	A.Abad	15	SSC		SSC 2nd	Almia	03.01.1997	14-Jan-71	6-Apr-99	6-Apr-99		
41	M. Safeer	Maqbool ur Rehman	GMS Kasaki Kalan	A.Abad	15	MA (arabic)	Arts	SSC 1st	Almia /BED	17.03.1997	20-Feb-73	01.03.1998	6-Apr-99		
42	SHOUKAT HUSSAIN	ABDUL HAQ	GMS Bandi Phullan	A.Abad	15	SSC 3rd		SSC 3rd	Almia	07.03.1998	1-May-75	28.02.1998	6-Apr-99		
43	INAM UR REHMAN	Molvi SAIF UR REHMAN	GMS LOONGAL	A.Abad	15				Almia	07.03.1998	25-Dec-74	8-Apr-99	8-Apr-99		
44	Muhammad ABU BAKAR	Muhammad SALIM KHAN	GHS Suma Karaga	A.Abad	15	SSC		SSC 2nd	Almia	21.02.1998	23-Apr-72	9-Apr-99	9-Apr-99		
45	ABDUL RAZAQ	ABDUL SATTAR	GHS Zairat Masoom	A.Abad	15	SSC		SSC 2nd	Almia	15.03.1998	4-Oct-76	9-Apr-99	9-Apr-99		
✓ 46	Naveed Iqbal	GHULAM RABANI	GMS Todu Maira ✓	A.Abad	15	MA (Arb) / 16.01.2012	Arts		Almia/ B.Ed (ARB)	14.01.1996/ 25.01.2007	19-Apr-75	10-Apr-99	10-Apr-99		
47	Qazi Muhammad TAYYAB	Qazi Muhammad YAQOUB	GHSS Nawanshehr	A.Abad	15	SSC			ALMIA.	14.01.1996	25-May-67	15-Apr-99	15-Apr-99		
48	Qazi Muhammad Naeem	Molvi Muhammad Younis	GMS Shahkot	A.bad	15	BA	Arts		Oriental faculty /Almia/B .Ed	1995	18-04-1979	14-04-1999	24-02-2000		
49	NADEEM GUL	ABDUR RASHID	GHS PK Khan	A.Abad	15	FA			Almia	27-02-97	2-Jun-73	10-Apr-99	1-Mar-00		
50	MUHMAD NAWAZ	MIRDAK KHAN	GMS Noormang	A.Abad	15	SSC			Almia	10.03.1997	3-Feb-68	1-Mar-00	1-Mar-00		
51	MUHMAD FAROOQ	MUHMAD SADIQ	GHS Ghora Baz Garan	A.Abad	15	F.A		SSC 2nd	Almia	08.02.1999	19-Feb-75	1-Mar-00	1-Mar-00		
52	Muhammad AZAD	Miskeen Khan	GMS Keri Sarafali	A.Abad	15	MA/B.Ed		SSC 2nd	Almia	15.03.1998	6-Oct-77	1-Mar-00	1-Mar-00		

ATTESTED

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verified by

District Education Officer
(Male) Abbottabad

WORKING PAPER FOR DEPARTMENTAL PROMOTION COMMITTEES FOR PROMOTION OF AT TO SAT (11-11-2019)

Total No. of AT posts duly verified by DAO	171
1/3 share of SAT Posts	57
Share of promotion 100%	57
Already promoted to the post of SAT	52
Post Available for Promotion	5
Proposed For Promotion SEN-NO: 20, 51, 52 (20, 48, 51, 52)	4
Deferred for Promotion Sen No. 46	1

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Sl. No.	Sr. No.	Name of Official	Father Name	Name of School	Date of Birth	Appointment as Regular AT	Qualification		Whether eligible for promotion	Committee Decision
							Acad:	Prof:		
1	20	S. MAZHAR HUSSAIN	Syed Murtaza Shah	GMS Tori Sharif	12-02-71	09-05-96	MA Arabic		Yes	OK
	44	Muhaminad ABU BAKAR	Muhammad SALIM KHAN	GHS Suma Karaga	23-04-72	09-04-99	SSC X	S. Almia	NO	Not Eligible
	45	ABDUL RAZAQ	ABDUL SATTAR	GMS Badiar	04-10-76	09-04-99	SSC X	S. Almia X	NO	Not Eligible
	46	Naveed Iqbal	GHULAM RABANI	GHS No. 3 Atd	19-Apr-75	10-04-99	MA (Arb)	Almia/B.Ed (ARB)	Deferred	Service Record is incomplete
	47	Qazi M. Tayyab	Qazi M. Tayyab	GHSS Nawanshehr	25-05-67	15-04-99	SSC	S. Almia	NO	Not Eligible
	48	Qazi Muhammad Nageem	Molvi Muhammad Younis	GMS Shahkot	15-04-79	16-Apr-99	MA/MED Arabic	S. Almia	Yes	OK
	49	NADEEM GUL	ABDUR RASHID	GHS Pind Kargo Khan	2-Jun-73	1-Mar-00	SSC	S. Almia	NO	Not Eligible
	50	MUHAMMAD NAWAZ	MIRDAD KHAN	GMS Noormang	3-Feb-68	1-Mar-00	SSC	S. Almia	NO	Not Eligible
	51	Muhaminad Farooq	MUHAMMAD SADIQ	GHS Ghora Baz Garan	19-Feb-75	1-Mar-00	BA/MA Isl	S. Almia	Yes	OK
	52	Muhammad Azadi	Miskeen Khan	GMS Keri Sarafali	6-Oct-77	1-Mar-00	MA-Isl/BA	S. Almia	Yes	OK

- All the AT (Main) included in the panel for the promotion of SAT Post
- Hold the post on regular basis and none of them is holding the post on adhoc/acting charge/contract basis.
- Have completed the required minimum length of qualifying service and qualifications as required for promotion of SAT under the rules.
- None of them is on deputation to any organization under the Federal/provincial autonomous/International organization.
- Whether any disciplinary/departmental proceeding/Anti-corruption/Judicial inquiry is pending against them or any penalty has been imposed upon any one of them during the last five years.
- None of them is on long leave/Ex-Pakistan leave.
- Their ACRs synopsis are free from adverse remarks.
- They are alive and serving.
- Their appointment order against AT post is attached herewith.
- The seniority list of AT officials is final, undisputed and not subjudice.
- The Departmental Promotion Committee is requested to determine the suitability of the above named AT for promotion to SAT with immediate effect.

W. O. S. No. 13689-10 (4) cases are recommended for promotion
District Education Officer (Male) Abbottabad

DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

- Director (E & SE) Peshawar
- Deputy Secretary (E & SE) Peshawar
- District Education Officer (M) A. Abad
- Deputy Director (E & SE) Peshawar
- Chairman
- Member
- Member
- Member

ATTESTED

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**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUN KHAWA PESHAWAR,**

ANNEXURE

Notification

Consequent upon 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, Senior TT 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 blow 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	787
1/3 Share of SCT Posts	262
Share of Promotion Quota of SCT	100%
Already Promoted to SCT	222
Posts Available for Promotion to SCT	40
Proposed CT for Promotion to SCT	36
Deferred of Promotion	4

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	215	Muhammad Riaz	GHS Tarnawal	8.2.1962	3.12.2003	MA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
2	216	Amjad Hussain	GHSS Dalola	16.10.1966	3.12.2003	MA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
3	217	Aftar	GMS Tarhana	15.1.1968	3.12.2003	MA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
4	218	Habib-ur-Rehman	GMS Tori Sharif	5.5.1969	3.12.2003	MA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
5	219	Muhammad Zahid	GHSS Rich Bhen	6.4.1966	3.12.2003	BILS, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
6	220	M.Farooq	GHSS Dalola	25.4.1960	3.12.2003	BA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
7	221	M.Ishfaq	GHS Kukmang	13.4.1969	3.12.2003	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
8	222	Babar Ali	GMS Summa Karaga	6.1.1970	3.12.2003	BA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect

APPROVED

Promotion of Senior Teachers of District Abbottabad

18

		Ab Khan	GMS Thathi Ahmad Khan	1.4.1967	3.12.2003	BA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
	224	Muhammad Akram	GMS Shaheed Abad	2.3.1967	3.12.2003	MA, M.Ed,	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
11	225	Khurshed Ahmad	GHS Sumandar Katha	1.5.1958	3.12.2003	BA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
12	226	Iftikhar Ahmad	GHSS Langrial	4.4.1968	3.12.2003	BA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
13	228	Matloob Hussain	GHS Jhangi	4.5.1967	3.12.2003	BA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
14	229	Manzoor Ahmad	GHS Phal Kote	1.5.1966	3.12.2003	BA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
15	230	Shah Muhammad	GHS Ghora Baz Garan	17.10.1974	3.12.2003	MA, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
16	231	Ghulam Mustafa Shah	GMS Choona Kari	15.3.1977	3.12.2003	MA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
17	232	Saifur Rehman	GMS Dobather	31.5.1977	3.12.2003	MA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
18	233	Gul Khateem	GMS Mallah	22.3.1975	3.12.2003	MA, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
19	236	Muhammad Zulfiqar	GMS Kukmang	1.4.1971	3.12.2003	BA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
20	237	Muhammad Arif	GHS Kanthiali	5.5.1973	3.12.2003	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
21	238	Ashfaq Ahmad	GHS Mirpur	10.4.1971	3.12.2003	MA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
22	239	Muhammad Waseem	GHS Tarnawal	3.3.1971	3.12.2003	MA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
23	240	Fakhar Islam	GHS Nammal	4.4.1974	4.12.2003	MA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
24	241	Ejaz Ahmad	GHS Sheikh Ul Bani	30.5.1967	3.12.2003	MA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect

Promotion of Senior Teachers of District Abbottabad

19

		Muhammad Shakeel	GMS Narduba	30.4.1973	3.12.2003	BA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
26	243	Majid Iqbal	GHSS Khanspur	24.6.1976	3.12.2003	MA, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
27	245	Sajid Hussain Shah	GHS No.1 Havelian	13.3.1978	3.12.2003	MA, M.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
28	246	Muhammad Shabir	GMS Takia Hall	20.3.1979	3.12.2003	MA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
29	248	Nasir Yaqoob	JICA Dhamtour	3.1.1974	3.12.2003	BSc-MST, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
30	249	Zamir Ahmed	GHS No.1 Havelian	1.1.1978	3.12.2003	BA, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
31	251	Muhammad Iqbal	GMS Sialkote	9.6.1962	4.12.2003	BA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
32	253	S.Chanzeb	GHS Bhuraj	31.3.1969	4.12.2003	MA, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
33	254	Muhammad Hamyun	GHS Sherwan	15.5.1973	4.12.2003	MA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
34	255	Muhammad Shafique	GHS Mera Rahmat Khan	10.4.1969	19.12.2003	MA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
35	256	Arshad Khan	GHS No.3 A/Abad	10.8.1964	19.12.2003	MA, B.Ed, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect
36	257	Abid Hussain Shah	GHSS Boi	1.1.1965	19.12.2003	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad 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	183
1/3 Share of SDM Posts	61
Share of Promotion Quota of SDM	100%
Already Promoted to SDM	52
Posts Available for Promotion to SDM	8
Proposed DM for Promotion to SDM	4
Deferred of Promotion	4

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt. as Regular DM	Qual:	Remarks
1	26	Zahid Gul Khan	GHSS Muslim Abad	4.5.1970	14.5.1993	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SDM in BPS-16 on regular basis with immediate effect

DISTRICT OFFICER

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		nan Gul Khan	GMS Nawansher	7.1.1976	31.3.2002	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SDM in BPS-16 on regular basis with immediate effect
3	57	Khalid Khan	GMS Ghambeer	1.12.1965	31.3.2002	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SDM in BPS-16 on regular basis with immediate effect
4	58	Sajjad Ahmiad	GMS Keri Raiki	20.08.1975	12.3.2003	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad 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	171
1/3 Share of SAT Posts	57
Share of Promotion Quota of SAT	100%
Already Promoted to SAT	52
Posts Available for Promotion to SAT	5
Proposed AT for Promotion to SAT	4
Deferred of Promotion	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular AT	Qual:	Remarks
1	20	S.Mazhar Hussain	GMS Tori Sharif	12.2.1971	9.5.1996	MA Arabic	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect
2	48	Qazi Muhammad Naeem	GMS Shah Kot	18.4.1979	14.4.1999	MA/M.Ed S.Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect
3	51	Muhammad Farooq	GHS GHORA Baz Garan	19.2.1975	1.3.2000	MA Isl, BA S.Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect
4	52	Muhammad Azad	GMS Keri Sabar Ali	6.10.1977	1.3.2000	MA Isl, BA S.Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in BPS-16 on regular basis with immediate effect

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

Total No. of Sanctioned Post of TT	183
1/3 Share of STT Posts	61
Share of Promotion Quota of STT	100%
Already Promoted to STT	56
Posts Available for Promotion to STT	5
Proposed TT for Promotion to STT	4
Deferred of Promotion	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular TT	Qual:	Remarks
1	68	Khursheed Ahmad	GMS Hazeera	17.1.1976	1.3.2000	BA, S. Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in BPS-16 on regular basis with immediate effect

NOTIFIED

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		Alibrar Hussain Shah	GHS Kuthwal	15.4.1979	1.3.2000	MA, Isl S.Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in BPS-16 on regular basis with immediate effect
3	98	Anwar-ul-Haq	GMS Deedal	1.4.1983	12.11.2009	BA, S.Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in BPS-16 on regular basis with immediate effect
4	99	Adeel Ahmed	GMS Gali Bania	18.9.1983	6.9.2012	MA Isl MA Arbia S.Alamia, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in BPS-16 on regular basis with immediate effect

ITEM No.5 PROMOTION OF PET (BPS-15) MALE TO THE POST OF SPET (BPS-16) ON REGULAR BASIS

Total No. of Sanctioned Post of PET	188
1/3 Share of SPET Posts	63
Share of Promotion Quota of SPET	100%
Already Promoted to SPET	59
Posts Available for Promotion to SPET	4
Proposed PET for Promotion to SPET	3
Deferred of Promotion	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PET	Qual:	Remarks
1	39	Altaf Hussain	GHS Sherwan	15.3.1969	12.9.1995	BA, MHPE, JDPE,	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SPET in BPS-16 on regular basis with immediate effect
2	40	Farman Ali	GHS Makool Payeen	9.11.1975	4.12.2003	BA, JDPE	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SPET in BPS-16 on regular basis with immediate effect
3	43	Tariq Khan	GHS Rajoiya	4.3.1976	3.1.2005	BA, JDPE	Services are placed at the disposal of DEO (M) Abbottabad 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 the duty.

NOTE

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Promotion of Senior Teachers of District Abbottabad

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 light 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 the charge of the post

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 1922-06 / File No.1/Pro: Senior Teacher (BPS-16) Dated Peshawar the 25.2.2020

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Abbottabad
3. District Accounts Officer Abbottabad
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

RECEIVED

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

NOTIFICATION

In pursuance to the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification issued vide Endst No. 2902-08/File No.1 Pro: Senior Teacher BPS-16 dated 25-02-2020, the following CT, DM, AT, TT, & PET (Male) are promoted to the post of SCT,SDM,SAT,STT & SPET 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 conditions given below and they are hereby further posted against vacant post of SCT,SDM,SAT,STT & SPET (B-16) in the schools noted against their names with immediate effect.

S. NO	SEN NO	NAME OF TEACHER	NAME OF SCHOOL	DATE OF BIRTH	PLACE OF POSTING	REMARKS
CT TO SCT						
1	215	MUHAMMAD RIAZ CT	GHS TARNAWAI	08-02-1962	GHSS BANDI DHUNDAN	PROMOED AND POSTED AS SCT AGAINST VACANT POST
2	216	AMJAD HUSSAIN CT	GHSS DALOLA	16-10-1966	GCMSS ATD	PROMOED AND POSTED AS SCT AGAINST VACANT POST
3	217	AFTAR CT	GMS TARHANA	15-01-1968	GHS JHANGI	PROMOED AND POSTED AS SCT AGAINST VACANT POST
4	218	HABIB UR REHMAN CT	GMS TORI SHARIF	05-05-1969	GHS PHALKOT	PROMOED AND POSTED AS SCT AGAINST VACANT POST
5	219	MUHAMMAD ZAHID CT	GHSS RICH BHEN	06-04-1966	GHSS RICH BHEN	PROMOED AND POSTED AS SCT AT THE SAME SCHOOL AGAINST VACANT POST
6	220	MUHAMMAD FAROOQ CT	GHSS DALOLA	25-04-1960	GHSS CHAMIALI	PROMOED AND POSTED AS SCT AGAINST VACANT POST
7	221	MUHAMMAD ISHFAQ CT	GHS KUKMANG	13-04-1969	GHS MUSLIMABAD	PROMOED AND POSTED AS SCT AGAINST VACANT POST
8	222	BABAR ALI CT	GMS SUMMA KARAGA	06-01-1970	GHS KOKAL BARSIN	PROMOED AND POSTED AS SCT AGAINST VACANT POST
9	223	GULAB KHAN CT	GMS THATHI AHMED KHAN	01-04-1967	GHS PIND KARGU KHAN	PROMOED AND POSTED AS SCT AGAINST VACANT POST
10	224	MUHAMMAD AKRAM CT	GMS SHAHEED ABAD	02-03-1967	GHSS RICH BHEN	PROMOED AND POSTED AS SCT AGAINST VACANT POST
11	225	KHURSHEED AHMAD CT	GHS SUMANDAR KATHA	01-05-1968	GHSS NAGRI BALA	PROMOED AND POSTED AS SCT AGAINST VACANT POST
12	226	IFTIKHAR AHMED CT	GHSS LANGRIAL	04-04-1968	GHS SATORA	PROMOED AND POSTED AS SCT AGAINST VACANT POST
13	228	MATLOOB HUSSAIN CT	GHS JHANGI	04-05-1967	GHS KAKUL	PROMOED AND POSTED AS SCT AGAINST VACANT POST
14	229	MANZOOR AHMED CT	GCMSS ATD	01-05-1966	GCMSS ATD	PROMOED AND POSTED AS SCT AT THE SAME SCHOOL AGAINST VACANT POST
15	230	SHAH MUHAMMAD CT	GHS GHORA BAZ GARAN	17-10-1974	GHSS MOHRI BED BHEN	PROMOED AND POSTED AS SCT AGAINST VACANT POST
16	231	GHULAM MUSTAFA SHAH CT	GMS CHOONA KARI	15-03-1977	GHS DIAMTOUR	PROMOED AND POSTED AS SCT AGAINST VACANT POST
17	232	SAIF UR REHMAN CT	GMS DOBATHER	31-05-1977	GCMSS ATD	PROMOED AND POSTED AS SCT AGAINST VACANT POST
18	233	GUL KHATEEM CT	GMS MALLAH	22-03-1975	GHSS RICH BHEN	PROMOED AND POSTED AS SCT AGAINST VACANT POST
19	236	MUHAMMAD ZULFIQR CT	GHS KUKMANG	01-04-1971	GHS CHAMIALI	PROMOED AND POSTED AS SCT AGAINST VACANT POST

TESTED

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20	237	MUHAMMAD ARIF CT	GHS KANTHIALI	05-05-1973	GHS KANTHIALI	PROMOED AND POSTED AS SCT AT THE SAME SCHOOL AGAINST VACANT POST
21	238	ASHFAQ AHMED CT	GHS MIRPUR	10-04-1971	GHS NO.4 ATD	PROMOED AND POSTED AS SCT AGAINST VACANT POST
22	239	MUHAMMAD WASEEM CT	GHS TARNAWAI	03-03-1971	GISS NAWANSHEHR	PROMOED AND POSTED AS SCT AGAINST VACANT POST
23	240	FAKHAR ISLAM CT	GHS NAMMAL	04-04-1974	GHS MOOLIA	PROMOED AND POSTED AS SCT AGAINST VACANT POST
24	241	EJAZ AHMED CT	GHS SHEIKH UL BANDI	30-05-1967	GISS HARN0	PROMOED AND POSTED AS SCT AGAINST VACANT POST
25	242	MUHAMMAD SHAKEEL CT	GMS NARDUBA	30-04-1973	GHS MOOLIA	PROMOED AND POSTED AS SCT AGAINST VACANT POST
26	243	MAJID IQBAL CT	GHS BANDA PIR KHAN	24-06-1976	GCMSS ATD	PROMOED AND POSTED AS SCT AGAINST VACANT POST
27	245	SAJID HUSSAIN SHAH CT	GHS NO. 1 HAVELIAN	13-03-1978	GIIS NO.1 HAVELIAN	PROMOED AND POSTED AS SCT AT THE SAME SCHOOL AGAINST VACANT POST
28	246	MUHAMMAD SIABIR CT	GMS TAKIA HALL	20-03-1979	GIIS JARRAI	PROMOED AND POSTED AS SCT AGAINST VACANT POST
29	248	NASIR YAQOOB CT	JICA DHAMTOUR	03-01-1974	GIIS DHAMTOUR	PROMOED AND POSTED AS SCT AGAINST VACANT POST
30	249	ZAMIR AHMED CT	GHS NO.1 HAVELIAN	01-01-1978	GIIS NAGRI TUTAIL	PROMOED AND POSTED AS SCT AGAINST VACANT POST
31	251	MUHAMMAD IQBAL CT	GMS SIALKOTE	09-06-1962	GIIS CHAMIALI	PROMOED AND POSTED AS SCT AGAINST VACANT POST
32	253	S. CHANZEB CT	GIIS BIURAJ	31-03-1969	GHS CHAMIAH	PROMOED AND POSTED AS SCT AGAINST VACANT POST
33	254	MUHAMMAD HAMYUN CT	GHS SHERWAN	15-05-1973	GIIS MALSA	PROMOED AND POSTED AS SCT AGAINST VACANT POST
34	255	MUHAMMAD SHAFIQUE CT	GHS MERA RAHMAT KHAN	10-04-1969	GHS MAIRA REHMAT KHAN	PROMOED AND POSTED AS SCT AT THE SAME SCHOOL AGAINST VACANT POST
35	256	ARSHAD KHAN CT	GIIS NO.3 A/ABAD	10-08-1964	GIIS NO. 3 ATD	PROMOED AND POSTED AS SCT AT THE SAME SCHOOL AGAINST VACANT POST
36	257	ABID HUSSAIN SHAH CT	GHS BOI	01-01-1965	GISS Bagmatay	PROMOED AND POSTED AS SCT AGAINST VACANT POST
DM TO SDM						
37	26	ZAHID GUL KHAN DM	GHSS MUSLIMABAD	04-05-1970	GHS DHAMTOUR	PROMOED AND POSTED AS SDM AGAINST VACANT POST
40	53	KHAN GUL KHAN DM	GMS NAWANSHEHR	07-01-1976	GHSS HARN0	PROMOED AND POSTED AS SDM AGAINST VACANT POST
41	57	KHALID KHAN DM	GHS GHAMBEER	01-12-1965	GCMSS ATD	PROMOED AND POSTED AS SDM AGAINST VACANT POST
42	58	SAJJAD AHMAD DM	GHS KERI RAIKI	20-08-1975	GHS KHARAGALI	PROMOED AND POSTED AS SDM vide S No. 54
AT TO SAT						
43	20	S. MAZHAR HUSSAIN AT	GMS TORI SHARIF	12-02-1971	GHSS DALOLA	PROMOED AND POSTED AS SAT AGAINST VACANT POST
44	48	QAZI MUHAMMAD NAEEM AT	GMS SHAH KOT	18-04-1979	GHS SHEIKH UL BANDI	PROMOED AND POSTED AS SAT AGAINST VACANT POST
45	51	MUHAMMAD FAROOQ AT	GHS GHORA BAZ GARAN	19-02-1975	GHSS PAWA	PROMOED AND POSTED AS SAT AGAINST VACANT POST
46	52	MUHAMMAD AZAD AT	GMS KERI SARAFALI	06-10-1977	GHS KHARAGALI	PROMOED AND POSTED AS SAT AGAINST VACANT POST

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TT TO STT						
47	68	KHURSHEED AHMAD TT	GHSS BANDI DHUNDAN	17-01-1976	GHS JHANGI	PROMOED AND POSTED AS STT AGAINST VACANT POST
48	70	S. IBRAR HUSSAIN .. SHAH TT	GHS KUTHWAL	15-04-1979	GHS KUTHWAL	PROMOED AND POSTED AS STT AT THE SAME SCHOOL.
49	98	ANWAR UL HAQ TT	GMS DEEDAL	01-04-1983	GHS HADORA BANDI	PROMOED AND POSTED AS STT AGAINST VACANT POST
50	99	ADEEL AHMED TT	GMS GALI BANIAN	18-09-1983	GHS KUTHWAL.	PROMOED AND POSTED AS STT vice S.NO 55
PET TO SPET						
51	39	ALTAH HUSSAIN PET	GHS SHERWAN	15-03-1969	GHS SHERWAN	PROMOED AND POSTED AS SPET AT THE SAME SCHOOL.
52	40	FARMAN ALI PET	GHS MAKOOL PAYEEN	09-11-1975	GHS NARFEELA	PROMOED AND POSTED AS SPET AGAINST VACANT POST
53	43	TARIQ KHAN PET	GHS RAJOYA	04-03-1976	GHS BANDI ATTAI KHAN	PROMOED AND POSTED AS SPET AGAINST VACANT POST

CONSEQUENTIAL TRANSFER

54		ALLAH DAD DM	GHS KHARAGALI		GHS KERI RAIKI	Vice S.No. 42
55		SAQIB CHANAN TT	GHS KUTHWAL		GHS GALI BANIAN	Vice S.No. 50

TERMS & CONDITIONS:

1. They will 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 Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge report shall 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 undertaking 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.
8. Before handing over charge their documents may be checked, if they have not the required relevant qualifications as per rule, they may not be handed over charge of the post.
9. Their promotion is subject to the condition that their BA/BSC and BED Degrees will be verified from the concerned Universities by this office, anyone found producing bogus degrees will be reported to the law enforcing agencies for further action

sd
DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD.

Endst: No. 1883-92 /EB-/Promotion/SCT/SDM/SAT/STT/SPET Dated A.Abad the 6/3 /2020

- Copy forwarded to the:
1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
 2. District Comptroller of Accounts Abbottabad.
 3. District Monitoring Officer(IMU) Abbottabad.
 4. All the Principals/Headmasters of concerned Schools.
 5. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
 6. Sub Divisional Education Officer(M) Abbottabad, Havelian, Lora and Lower Tanwal.
 7. Budget & Accounts Officer local office.
 8. AP EMIS branch local office.
 9. All the Teachers concerned.
 10. Master File

[Signature]
DY: DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

ATTESTED

[Signature]

To

Secretary Elementary,
& Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: *Departmental Appeal Under Civil Servant Right to Appeal Rules 1986 U/S-3-1 of the Govt of KPK, against the Illegal Promotion Order from A.T to S.A.T post vide Endst:2902-08 dated 25/02/2020, issued by Director Elementary & Secondary Education, KPK, Peshawar.*

Respected Sir,

Facts leading to appeal are as under:-

1. That, impugned promotion order is totally illegal and liable to be modified on the basis of following grounds:-
 - i) That, Appellant appointed as a A.T on 10/04/1999 and now the appellant is working as a "A.T" (Arabic Teacher) at G.H.S No.3, Abbottabad.
 - ii) That, Government of KPK issued a Promotion Policy on 11/07/2012 according to which, 1/3 Teachers from every Cadre were to be promoted into next Hire Scale.
 - iii) That, on 11/11/2019 a Meeting of DPC was held under the said Promotion Policy dated 11/07/2012 in which the appellant was intentionally ignored under personal grudges and, the most junior teachers from the appellant, were promoted from A.T to S.A.T posts although the appellant was fulfilling the entire requisite requirement for promotion.
 - iv) That, on 25/02/2020, Director E&S Education issued order for recommendation of said promotions from A.T to S.A.T post in which the name of applicant was not included.
 - v) That, on 06/03/2020 vide Endorsement No. 1883-92, District Education Officer (Male) Abbottabad issued order for adjustment of the said promotes in the light of above said order dated 25/02/2020.

It is therefore very humbly prayed that on acceptance of instant Departmental Appeal, the said impugned illegal order dated 25/02/2020, may kindly be modified and appellant, may kindly be promoted from A.T to S.A.T post with all back benefits.

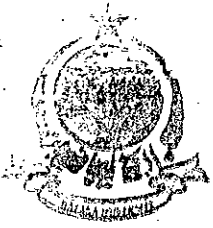
NAVEED IQBAL (A.T)
GHS, No. 3, Abbottabad
Dated: 13/03/2020

ATTESTED
[Signature]

9	10	11	12	13		14	15	
				Nature and duration of leave taken	Leave			
					Period			Government to which debitable
STOPPAGE OF 04 INCREMENTS								
Conversion of major Penalty of removal from Service into minor penalty of stoppage of 04 (four) increments for accumulative effect vide Director (ESSE) Peshawar Endst. NO. 221-26 dated 02-11-2011.								
			S-1		12			
			4-12-2012		12			
			12-2011		12			
			12-2011		12			
Dy. District Education Officer (Male) Abbottabad								
<p style="text-align: right;">Comptroller of Accounts Abbottabad</p>								
<p style="text-align: right;">District Comptroller of Accounts Abbottabad</p>								
<p style="text-align: right;">Served Verified From the Acq. Roll & Other Official Record</p>								
<p style="text-align: right;">W. E. [Signature]</p>								
<p style="text-align: right;">Dy. District Education Officer</p>								

K

Mc



HAZARA UNIVERSITY

SN0: 0143

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE ANNEXURE

MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2011

o.k.

Roll No: 30529 Reg No: 04-P-1073
 Name: Naveed Iqbal F/ Name: Ghulam Rabbani
 Institution/ District: HARIPUR Subject: Arabic

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				382	THREE HUNDRED EIGHTY-TWO	
Religious Literature (Al-Hadith)	100		92		92	NINETY-TWO	Pass
Modern Literature (Prose & Poetry)	100		90		90	NINETY	Pass
Literary History of Arabs	100		66		66	SIXTY-SIX	Pass
Rhetoric (Al-Balaghat)	100		90		90	NINETY	Pass
Essay Writing	100		92		92	NINETY-TWO	Pass
General Viva Voice	100		75		75	SEVENTY-FIVE	Pass
Total:					1100		
Percentage:					80.64		
Division:					FIRST		
					887	EIGHT HUNDRED EIGHTY-SEVEN	

Print Date: 28-03-2012

Checked By:

Errors and omissions are subject to subsequent rectification.
 Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

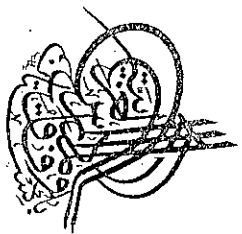
Controller Examinations
 Hazara University, Mansehra
 16 January, 2012

ATTESTED

رسالة التخرُّج



شهادة التخرُّج



الأحمد لله رب العالمين، والصلاة والسلام على خاتمة الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة
 وفاق الدراسات العربية بباكستان، تشهد بأن الشيخ خالد مبراني بن خالد مبراني من إيسط آباد
 المولود في عام ١٣٩٥هـ/١٩٧٥م قد أتمه الدراسة الشهائية في جامعة بنوريه كابل أفغاني ونجح في امتحانها النهائي المنعقد
 تحت إشراف وفاق الدراسات العربية في سبتمبر ١٤١٨هـ بتقدير جيد جداً وبمكافأة ١٩٩٨
 ورئيس الوفاق إذ يمنحه هذه الشهادة بوصفه بتفوقه الذي ويقال الله عز وجل إن يسالك به سبيل العلم الكمايين؛

بني محمد والي

بني محمد والي

بني محمد والي

بني محمد والي

رقم التسجيل ٣٤٥٨٨

رقم بابوس ١٥٢٠

الأبحاث ٦٠-٣٨٤

محل الإصدار: الجامعة الإسلامية

التاريخ: ١٩٧٨/١٢/١٤



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TESTED

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1

BEFORE THE KHYBER PAKHTUKHWA SERVICE TRIBUNAL
CAMP COURT, ABBOTTABAD

Application No. /2020

IN

Service Appeal No.7810/2020

Naveed Iqbal S/O Ghulam Rabbani, AT Teacher, Government High School No.3 (English Medium), Abbottabad; Resident of Village Banda Khair Ali Khan Post office Dobather, Tehsil and District Abbottabad. Cell No.0333-5059368

....APPELLANT

VERSUS

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

....RESPONDENTS

APPLICATION FOR SUSPENSION OF THE DPC DATED 11/09/2020 HELD BY RESPONDENT NO.2 AND, RESPONDENTS MAY GRACIOUSLY BE RESTRAINED TO ISSUE THE PROMOTION ORDER APPROVED IN THE ABOVE MENTIONED DPC.

Respectfully Sheweth,

1. That, the title appeal is pending before this Hon'ble Tribunal and fixed for hearing today on 20/11/2020 against the impugned illegal promotion order dated 25/02/2020, issued by respondent No.2.

2. That, in the impugned notification, 03 most junior Arabic teachers were promoted from AT (BPS-15) to SAT (BPS-16) in the light DPC held on 11/11/2019.
3. That, after that, another DPC was held on 11/09/2020 in which 06 more most junior Arabic Teachers (BPS-15) were approved for promotion to SAT (BPS-16) and notification in this regard is expected to be issued very soon but the applicant, once again, was not considered for the promotion.

It is therefore, very humbly requested that on acceptance of the instant application, order be issued for suspension of the DPC dated 11/09/2020 held by the respondent No.2 and respondents may graciously be restrained to issue the promotion order approved in the above mentioned DPC.

Dated: 20/11/2020


Naveed Iqbal.....Appellant

(In Person)

Certificate:

Certified that the contents of the foregoing application are true and correct to the best of my knowledge and belief and nothing is concealed by this Hon'ble Tribunal.

Dated: 20/11/2020


DEPONENT

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

Appeal No. 7810/2020

Naveed IqbalAppellant


VERSUS

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

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

INDEX

Sr.#	Description	Page No's	Annexure
1	Joint Parawise Comments alongwith Affidavit	01 to 04	
2	Copy of Notification No. 9389-98 dated 11-12-2020	05 to 07	"A"


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

01/12/2021

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

Appeal No. 7810/2020

Naveed IqbalAppellant

VERSUS

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

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NOS. 1 TO 3

RESPECTFULLY SHEWETH:-

Comments on behalf of respondents are submitted as under:-

Preliminary Objections:-

1. That the appellant has no cause of action to file the instant service appeal.
2. That the instant appeal is time barred. Hence liable to be dismissed.
3. That the instant appeal is not maintainable in its present form.
4. That the appellant has no locus standi to file instant appeal.
5. That the appellant has filed the present appeal just to pressurize the respondents.
6. That the appellant has not come to this Honorable Tribunal with clean hands hence, not entitled for any relief.
7. **That this Honourable Tribunal has got no jurisdiction to entertain the present appeal as per judgment reported as 2013-SCMR-99.**
8. **That the appellant has been promoted against the post of SAT vide Notification issued under Endst: No. 9389-98 dated 11-12-2020.**
9. That the appellant is estopped to sue due to his own conduct..
10. That the instant appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
11. That the instant appeal is against the rules and policy of the Government.

 **Factual Objections:-**

1. That Para No. 01, of the service appeal relates to the service record of the appellant hence, need no comment.
2. That Para No. 02, of the service appeal relates to service record.
3. That Para No. 03, of the service appeal relates to record.
4. That Para No. 04, of the service appeal also relates to record.
5. That Para No. 05, of the service appeal relates to record.
6. That Para No. 06, of the service appeal relates to record.
7. That Para No. 07, of the service appeal relates to record.
8. That Para No. 08, of the service appeal relates to record.

9. That Para No. 09, of the service appeal is correct to the extent that DPC was held on 11-11-2019 and the name of appellant was included in the working paper for Departmental Promotion Committee for Promotion of Arabic Teacher to Senior Arabic Teacher at serial No. 4 but the promotion case of the appellant was deferred due to the remarks that the service book of the appellant was incomplete. (Copy of working paper has already been annexed as Annexure "H" at page No. 16 of the service appeal).
10. In reply to Para No. 10 of the service appeal it is submitted that the promotion case of the appellant from Arabic Teacher to Senior Arabic Teacher the promotion case of the appellant was deferred due to the remarks that the service book of the appellant was incomplete. Further submitted that Notification dated 25-02-2020 was issued after observing all the codal formalities and the appellant has been promoted against the post of SAT vide Notification issued under Endst: No. 9389-98 dated 11-12-2020 as the name of appellant falls at serial No.26. (Copy of Notification No. 9389-98 dated 11-12-2020 is annexed herewith as annexure "A").
11. That Para No. 11, of the service appeal relates to record.

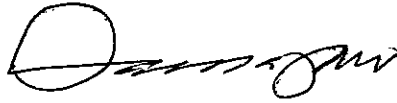
Grounds:-

- a. In reply to ground a, comprehensive reply has already been given in Para No. 9 of the factual objections.
- b. That the ground b, as composed is incorrect hence, denied.
- c. That the ground c, as composed is incorrect hence, denied.
- d. That the ground d, as composed is incorrect hence, denied.
- e. That the grounds e, of the service appeal as composed is incorrect hence, denied.
- f. That the ground f, of the service appeal as composed is incorrect hence, denied.
- g. That the ground g, of the service appeal as composed is incorrect hence, denied.
- h. That the ground h, of the service appeal as composed is incorrect hence, denied as comprehensive reply has already been given in Para No. 9 of the factual objections.
- i. That the ground i, of the service appeal as composed is incorrect hence, denied. Notification dated 25-02-2020 was issued after observing all the codal formalities.
- j. That the ground j, of the service appeal as composed is incorrect hence, denied.
- k. No comment.
- l. That the respondents seek leave of this Honourable Tribunal to raise additional points/grounds during the course of arguments.

It is, therefore, very humbly prayed that in the light of forgoing comments the service appeal in hand may graciously be dismissed with cost throughout.



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



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



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

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

Appeal No. 7810/2020

Naveed IqbalAppellant

VERSUS

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

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

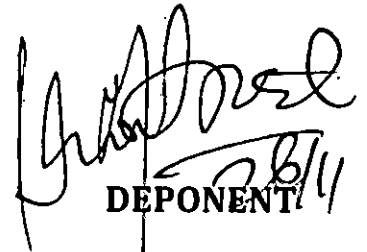
PESHAWAR CAMP COURT ABBOTTABAD

AFFIDAVIT

Naveed Iqbal

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

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS


DEPONENT

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

Ann-A (5)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

NOTIFICATION

In pursuance to the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Notification issued vide Endst No. 2658-63/File No.1 Promotion SCT BPS-16 dated 08-12-2020, the following CT, DM, AT, TT and PET, (Male) are promoted to the post of SCT, SDM, SAT, STT and SPET, in BPS-16 (Rs 18910-1520-64510) respectively plus us usual allowances as admissible under the Rules on regular basis under the existing policy of the provincial Government on the terms and conditions given below and they are hereby further posted against vacant post in the schools noted against their names with immediate effect.

S. NO	SEN NO	NAME OF TEACHER	NAME OF SCHOOL	DATE OF BIRTH	PLACE OF POSTING	REMARKS
CT TO SCT						
1.	73	MURTAZA KHAN CT	GHSS Muslimabad	07-01-1970	GHS No.1 Havelian	Promoted and Posted as SCT Against Vacant Post
2.	258	Muhammad Zaheer CT	GHS Boi	20/02/1967	GHS Sarhan	Promoted and Posted as SCT Against Vacant Post
3.	259	M.ASIF CT	GHS Bagan	01-03-1964	GHS Keri Raiki	Promoted and Posted as SCT Against Vacant Post
4.	261	Abdul Ghaffar CT	GHS Majuhan	30-05-1974	GHS Bakot	Promoted and Posted as SCT Against Vacant Post
5.	262	ALI HAIDER CT	GHS Sherwan	25-04-1962	GHSS Richbhen	Promoted and Posted as SCT Against Vacant Post
6.	263	Muhammad. IRSHAD CT	GHSS Bandi Dhundan	18-05-1976	GHS No.3 Atd	Promoted and Posted as SCT Against Vacant Post
7.	264	ABDUL QAYYUM SHAH CT	GMS Narduba	06-06-1971	GHSS Harno	Promoted and Posted as SCT Against Vacant Post
8.	265	ATIQ UR REHMAN CT	GHS Satora	02-12-1974	GHS Satora	Promoted and Posted as SCT Against Vacant Post
9.	266	Syed Hafeez Ahmed Shah CT	GMS Bandi Matrach	04-03-1975	GHSS Richbhen	Promoted and Posted as SCT Against Vacant Post
10.	267	RIZWAN AHMAD CT	GHS. Takia Sheikhan	01-03-1973	GHS Jhangra	Promoted and Posted as SCT Against Vacant Post
11.	268	Aftab Ud Din CT	GHSS No.1 Abbottabad	02-03-1961	GHSS No.1 Atd	Promoted and Posted as SCT Against Vacant Post
12.	269	IMTIAZ AHMED CT	GHS Beeran Gali	10-03-1967	GHS Malsa	Promoted and Posted as SCT Against Vacant Post
13.	270	ABDUL RAHIM CT	GMS Banota	10-02-1966	GHSS Chamiali	Promoted and Posted as SCT Against Vacant Post
14.	272	MUHAMMAD MUSHTAQ CT	GHS Rajoiya	03-05-1968	GHSS Mohri Bed Bhen	Promoted and Posted as SCT Against Vacant Post
15.	273	KALA KHAN CT	GHS Jarral	02-04-1967	GHS Jarral	Promoted and Posted as SCT Against Vacant Post
16.	274	GOHAR REHMAN CT	GHS Pattan Khurd	04-12-1967	GHS Pattan Kalan	Promoted and Posted as SCT Against Vacant Post
17.	275	SAIN MUHAMMAD CT	GHS jabbrian	26-02-1967	GHSS No.1 Atd	Promoted and Posted as SCT Against Vacant Post
18.	276	QAMAR ZAMAN CT	GHS Majuhan	01-04-1966	GHS Bakot	Promoted and Posted as SCT Against Vacant Post
19.	277	TANVEER AHMED CT	GHSS Bandi Dhundan	01-04-1970	GHSS Nawanshehr	Promoted and Posted as SCT Against Vacant Post
DM TO SDM						
20.	23	MUSHTAQ AHMED DM	GHS No.04 A/Abad	11.May-69	GHSS Nawanshehr	Promoted and Posted as SDM Against Vacant Post
21.	27	Muhammad Ishaq DM	GHS Jhangi Abbottabad	30-Apr-69	GHS Kanthiali	Promoted and Posted as SDM Against Vacant Post
22.	32	ZAHID SHAH DM	GMS Thunda	10-Oct-73	GHSS Chamiali	Promoted and Posted as SDM Against Vacant Post
23.	34	IBRAHIM DM	GMS TATREELA	03-Feb-76	GHS Khaira Gali	Promoted and Posted as SDM Against Vacant Post

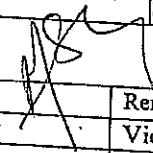
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24	35	CHAN ZEB DM	GMS Badhjar	03-Feb-76	GHS Majuhan	Promoted and Posted as SDM Against Vacant Post
25	36	JAMIL AHMED DM	GMS Tootni	13-Feb-76	GHS Chamhatti	Promoted and Posted as SDM Against Vacant Post
AT TO SAT						
26	23	Naveed Iqbal AT	GHS No.3 Atd	19-04-1975	GHS No.3 Atd	Promoted and Posted as SAT Against Vacant Post
27	29	ABDUL MAJID AT	GMS Beri Bagla	10.04.1970	GHS Pattan Kalan	Promoted and Posted as SAT Against Vacant Post
28	33	JAMIL SABIR AT	GMS Narduba	06.06.1975	GHS Kuthwal	Promoted and Posted as SAT Against Vacant Post
29	34	M ZUBAIR AT	GHS Hadora Bandi	14.03.1976	GHS Khaira Gali	Promoted and Posted as SAT Against Vacant Post
30	37	NISAR AHMED AT	GHS Kukmang	2-Apr-77	GHS Rajoya	Promoted and Posted as SAT Against Vacant Post
31	38	AMJAD IQBAL AT	GMS BANSERI	11.07.1978	GHS Jarra	Promoted and Posted as SAT Against Vacant Post
32	39	RASHID HASSAIN KHAN AT	GMS Topa Khan Kalan	15.03.1979	GHS Kakul	Promoted and Posted as SAT Against Vacant Post
TT TO STT						
33	63	SAQIB REHMAN TT	GMS TATHI SB	10.08.1987	GHSS Richbhen	Promoted and Posted as STT Against Vacant Post
34	64	SHAHAB AHMED TT	GMS Jhaffar	02.01.1987	GHS Khaira Gali	Promoted and Posted as STT Against Vacant Post
35	65	MUHAMMAD SHOAIB TT	GHS SUMA KARAGA	12.12.1990	GHS Surjal	Promoted and Posted as STT Against Vacant Post
36	66	ZAHEER SARWAR TT	GHSS Bandi Dhundaan	10.10.1979	GHSS Lora	Promoted and Posted as STT Against Vacant Post
PET TO SPET						
37	40	Mushtaq Ahmed PET	GMS Dabban	01-05-1973	GHS Chamhatti	Promoted and Posted as SPET Against Vacant Post
38	42	Abdul Malik PET	GMS Tootni	20-07-1978	GHSS Richbhen	Promoted and Posted as SPET Against Vacant Post

CONSEQUENTIAL TRANSFER				
S.No	NAME /Designation	FROM	TO	Remarks
1	Gul Zaman DM	GHS Surjal	GMS Tootni	Vice S.No 25
2	Nazir Ahmed CT	GMS Salhad	GHSS No.1 Atd	Vice S.No 11
3	Aamir Sharif SPET	GHSS Richbhen	GHSS Nawanshehr	A.V.P

Terms & Conditions:

1. They will 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 Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge report shall 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 undertaking 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.
8. Before handing over charge their documents may be checked, if they have not the required relevant qualifications as per rule, they may not be handed over charge of the post.
9. Their promotion subject to the condition that their BA/BSC and BED Degrees will be verified from the concerned Universities by this office, anyone found producing bogus degrees will be reported to the law enforcing agencies for further action


 MUHAMMAD SHAUKAT
 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD.

Indst: No. 7389-98 /EB-/Promotion/SCT/SDM/SAT/STT/SPET

Dated A.Abad the 11/12/2020

Copy forwarded to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Abbottabad.
3. District Monitoring Officer(IMU) Abbottabad.
4. All the Principals/Headmasters of concerned Schools.
5. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
6. Sub Divisional Education Officer(M) Abbottabad, Havelian, Lora and Lower Tanwal.
7. Budget & Accounts Officer local office.
8. AP EMIS branch local office.
9. All the Teachers concerned.
10. Master File


Dy: DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL
CAMP COURT, ABBOTTABAD

Service Appeal No: 7810/2020

Naveed Iqbal.....**Appellant**

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar & 02 Others.

.....RESPONDENTS

PARA WISE REJOINDER ON BEHALF OF APPELLANT AGAINST THE COMMENTS/REPLY OF THE RESPONDENTS SUBMITTED ON 21/12/2021 BEFORE THIS HONOURABLE TRIBUNAL.

Respectfully Sheweth:

Rejoinder on behalf of appellant is submitted as under:-

ON PRELIMINARY OBJECTIONS:

- 1 to 11.** All objections from Sr. No-1 to 11 are incorrect and wrong and have no space in law. Respondents had totally failed to produce any legal objection against the appellant. The Service Tribunal is the proper forum for appellant to file the appeal against the illegal act of respondents. The appellant is a Civil Servant and the Terms and Conditions of promotions relating to Service matter which comes under the jurisdiction Service Tribunal. According to Judgment 2002 SCMR 1016, PLD 2008, SC 769 2001 SCMR 1446. The appellant was badly suffered due to the illegal act, malafide practice and mutual connivance of the respondents and filing of appeal against the illegal act of respondents is a fundamental right of the appellant. Appellant came to this Hon'ble Tribunal through proper channel with clean hands but respondents concealed and distorted the material facts from this Honourable Tribunal. The appeal of the Appellant was filed well within time, hence maintainable which is pending before this honourable tribunal for further proceeding.

ON FACTS

1 to 8:

That, the Para Nos.1 to 8 the appeal are correct while the reply of Para Nos.1 to 8 is incorrect because the Respondents due to its malafide practice, totally failed to defend these Paras.

- ~~9.~~ That, the Para No. 9 of the appeal is correct while the reply of Para No.9 is incorrect. Respondents are denying the facts without any cogent proof thus, again failed to defend the instant Para. The DPC was held on 11/09/2019 which

was suspended by the Hon'ble Tribunal on 20/11/2020 thus, the promotion order dated (08/12/2020) 11/12/2020 issued by respondents No.2 & 3 is totally illegal and contempt of the order of this Honourable Tribunal. The appellant was promoted without receiving the necessary concerned documents required for the promotion purpose.

10. That, Para No. 10 of the appeal is correct while the reply of Para No.10 is incorrect. Promotion order dated 25/02/2020, in which the applicant was promoted w.e.f. 08/12/2020, is totally illegal, unlawful and liable to be set-aside because the appellant reserves for his promotion w.e.f. 25/02/2020 with all back benefits.

ON GROUNDS:

"a to L"

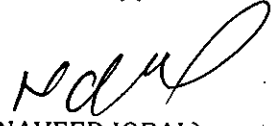
All the grounds of the appeal from Para Nos. "a to L" are correct while the reply of ground from Para Nos. "a to L" are incorrect. In these Paras, respondents did not reply properly only concocted story has been written in the these Paras of the reply of ground.

- b. that, during the process of the departmental appeal respondent No.1 conducted impartial inquiry against the deferment of the appellant from the promotion in the month of June 2020 but inquiry report was not submitted up to the 11/07/2020 at which appellant filed instant service appeal after passing 90 days after submission of departmental appeal.
- c. that, on 08/09/2020, inquiry committee submitted inquiry report and respondent No.2 implemented the recommendation of inquiry report and promoted the appellant from BPS-15 to BPS-16 from AT to SAT post on 08/12/2021 with immediate effect while the appellant should be promoted w.e.f. 25/02/2020. **(Copy of inquiry report is annex as Annexure "A")**

It is therefore very humbly prayed that:

1. Inquiry report may graciously be made the part of record of the Hon'ble Tribunal.
2. Reply of the department may kindly be rejected with cost and appeal of the appellant may kindly be accepted as per the prayer.

Dated: 21/01/2022


(NAVEED IQBAL)
(APPELLANT)
In person

CERTIFICATE:

It is to certify that the contents of foregoing Rejoinder are true and correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'ble Tribunal.


.....DEPONENT

3

4/1

OFFICE OF THE PRINCIPAL
GHSS CHAMKANI PESHAWAR
D.No. 359 DATED.08/09/2020

To,

The Director,
E & SE KP.

Subject: Submission of Inquiry Report

R/Sir,

With utmost reverence it is stated that reference your
letter No.613-16 File.Abbattabad/27-7/complaint Cell/2018 dated
20/04/2020. The inquiry report is submitted herewith for your kind
information & necessary action please.

Toku - Arif

PRINCIPAL

Muhammad Arif khattak

GHSS CHAMKANI PESHAWAR

PRINCIPAL
Govt. Shaheed Muzammil
Higher Secondary School
Chamkani Peshawar

(4) (13)

INQUIRY REPORT

Title of Inquiry: -

Conducting an impartial inquiry regarding the differing of Mr. Naveed Iqbal from AT to S.A.T.

Inquiry committee: -

1. Muhammad Arif Khattak Principal GHSS Chamkani Peshawar
(Chairman)
2. Muhammad Saleem SSS GHSS Chamkani Peshawar
(Member)

Tors: -

To probe into the issue of differing of Mr Naveed Iqbal AT GHS No-3 Abbottabad from promotion A.T. to S.A.T.

Procedure of Inquiry: -

Inquiry proceeding was initiated keeping in view of the facts of differing of Mr. Naveed Iqbal A.T. GHSS No. 3 Abbottabad in DPC from AT to S.A.T. Proper opportunity and ample time was provided to the representative of DEO (M) Abbottabad i.e. M. Ayaz Establishment Supdt on behalf of the DEO (M) Abbottabad and Mr. Naveed Iqbal A.T. GHSS No.3 Abbottabad for personal hearing. All of them were heard at length questioners were served upon them and their written replies were obtained (Annexure M & N). The available office record of DEO (M) Abbottabad was thoroughly examined necessary record pertaining to the inquiry was also obtained from DEO(M) Abbottabad and properly examined (Annexure A to L) comprehensive statement of the applicant and photo copy of the original service book was also obtained in the presence of inquiry committee in his defense and properly examined (Annexure-O page-13) A session was arranged to provide proper opportunity to the applicant and the departmental representative of DEO(M) Abbottabad for cross examination with all the evidence/witnesses. The proceeding was recorded in the presence of inquiry committee.

OBSERVATION:

Mr. Naveed Iqbal AT GHS No.3 Abbottabad was proceeded a departmental enquiry in 2010 and consequently he was removed from service with effect from 23.11.2010. However, feeling aggrieved the appellant filled a departmental appeal before the appellant authority which was accepted vide Order No.3229-33-26/FNo.502/DM/AT/(Male) dated 28.07.2011 by converting the major penalty of removal from service into another major penalty of reduction to lower post of theology teacher (BPS-15 to BPS-7). the appellant feeling aggrieved from the Order No.3229-33 dated 28-07-2011 again preferred a departmental appeal to the next higher authority consequently the appellate authority converted the said major penalty into the minor penalty of stoppage of four increment with accumulative effect vid Order No.221-26 dated 02-11-2011. In pursuance to the review order cited above the accused was adjusted against AT post at GMS TODO MERA on 02-11-2011 were on taking over charge in the said school his monthly salary was properly activated with effect from 01-12-2011 at his previous position without Re-fixation of his salary in the light of review order issued by Director Elementary & Secondary KP Peshawar. Other necessary entries were also not made in his service book. This is gross negligence and in efficiency on the part of then DDO for boys Middle school Abbottabad. The appellant was again transferred to GMS Hazeera Abbottabad on his own request on 07-01-2012. He took over the charge in the said school on 09-01-2012.

The office record also revealed that the dispute of missing of service book of the appellant arose when he was adjusted in the light of review order issued by Director Elementary & Secondary Education by his Endst.No221-26/File No.502/A/15/DM/AT(M) dated 02-11-2011. The enquiry report submitted by Additional Commissioner Hazara Abbottabad reveals that after reinstatement of the appellant his service book was found out at GHS No.3 Abbottabad.

(1) (2) (3)

The appellant then produced his service book before the previous enquiry committee during inquiry proceeding in June-2013. However the enquiry committee returned the same to the appellant as per the commitment finally the appellant submitted his service book to the office of DEO Male Abbottabad on 08-07-2013. As per his own statement during the cross examination the appellant admitted that he had collected his service book from DAO Abbottabad and had produced to the previous enquiry committee. The committee returned the same to him and submitted the same in the office of District Education Officer (Male) Abbottabad.

FINDINGS

In view of the above narrated facts from perusal of available record and having gone through documentary and other evidence the inquiry committee has come to the conclusion that: -

1. Seniority and check List prepared for DPC held on 11-11-2019 at DEO Male Abbottabad Mr Naveed Iqbal appeared at S.No.4.
2. All columns of the requisite documents before the name of Mr. Naveed Iqbal AT in check List are properly ticked (/) but none is crossed.
3. During cross examination from the representative of concerned DEO (Male) Abbottabad M.Ayaz established Supdt. When all pre-requisite are full filled then why Mr.Naveed Iqbal AT GHS No-3 Abbottabad has been differed. His reply was that his service is not verified from 01-10-2009 to update.
4. When the concerned DEO Male Supdt were asked that whether this office has intimated the deficiency to the concerned official in writing or through proper channel / Directly. No Such Record was found.
5. The same question was repeated from Mr. Naveed Iqbal, he told that he has submitted all the pre-requisite documents which are cleared from check list issued from DEO Male Abbottabad for DPC held on 11-11-2009 but service

verification in service book is not a part of my duty. He also provides a photo copy of Original service book in which the same Period was verified by then DDO Male Abbottabad. Qazi Tajamal and then someone cut it (Photocopy of service book attached).

6. Mr. Naveed Iqbal AT GHS No.3 Abbottabad is also promoted from AT to SAT on 30-05-2016 No.278 by office of principal GHS.No.3 Abbottabad. Exercising the power delegated by finance department (regulation Wing) No.FD/SO/FR/07-20-2015 (order attached).
7. Revised pay slip issued by DAO Abbottabad in respect of Mr. Naveed Iqbal SAT in BPS-16 (photocopy of pay slip attached).
8. Completion of service book is the prime duty of concerned DDO Male Abbottabad so differing of Mr. Naveed Iqbal AT in DPC shows a great negligence on part of DDO Male Abbottabad.

RECOMMENDATIONS:

The committee recommends that: -

1. The concerned DDO Male Abbottabad may be directed to look into the matter and check the cutting of service verified on page-13 in original service book by Qazi Tajamal the then Ex-DDO male Abbottabad.
2. As such maintenance of Service book is the prime responsibility of the concerned DDO while in the instant case, the reply of the concerned quarters is not convincing. Therefore, it is recommended that appeal of Mr. Naveed Iqbal AT GHS No-3 Abbottabad regarding his differral from promotion may be accepted.

Member

Muhammad Saleem SSS
Chamkani Peshawar

Chairman

7054-90
Muhammad Arif Khattak
Principal GHSS Chamkani Peshawar

PRINCIPAL
Govt. Shaheed Muzaffar
Higher Secondary Sch.
Chamkani Peshawar



8

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR

Phone: 091-9225336, 9225342, E-mail: complaintcellese@gmail.com

No. 1271-72 File. Abbottabad/27-7/Complaint Cell/2018

Dated Pesh: the 17/09/2020.

To

1. The Deputy Director, Establishment-I, Local Directorate. Education,
2. District Education Officer (Male) Abbottabad.

Subject: - **APPLICATION FOR CONDUCTIONG AN IMPARTIAL INQUIRY REGARDING THE ILLEGAL DIFFERING OF APPLICANT FROM PROMOTION.**

I am directed to refer to the subject noted above and to enclose an Inquiry Report conducted by inquiry officer Mr. Muhammad Arif Khattak, Principal, GHSS, Chamkani, Peshawar, received to this Directorate vide No. 359 dated 08/09/2020,

You are therefore requested to implement the recommendation of the enclose inquiry report with letter & spirit immediately and submit compliance report within 15 days from the date of receipt of this letter for onward submission to high ups.

Enclose as Above.


Assistant Director (Complaint)
Directorate of E&SE KPK

Endst No. 1273-74 /

Copy forwarded to the: -

1. Section Officer (Complaint) Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar w/r to his letter vide No. SO(C)E&SED/1-7/2020/Naveed Iqbal/201 dated 27/02/2020
2. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.


Assistant Director (Complaint)
Directorate of E&SE KPK

DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUN KHAWA, PESHAWAR.

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO/BA/1-18/ESSE/2012, dated 11.7.2012 and Finance Department Endorsement No. SO(FR)/FD/ 10-11/2012, dated 16.7.2012, the following CT, DM, AT, TT and PET (Male) are promoted to the posts of Senior DM, Senior AT, Senior TT and Senior PET in BPS-16 (Rs. 18910-1520-64510) respectively, plus Dearness allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given blow 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

Number of Sanctioned Post of CT	787
Number of SCT Posts	262
Percentage of Promotion Quota of SCT	100%
Already Promoted to SCT	242
Posts Available for Promotion to SCT	20
Proposed CT for Promotion to SCT	19
Deferred of Promotion from CT to SCT	1

Sr	Sr#	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
		Murtaza Khan	GHSS Muslim Abad	7.1.1970	13.5.1997	MA, CT, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	255	Munammad Zaneer	GHS Bohi	20.2.1967	19.12.2003	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	259	Muhammad Asif	GHS Bagan	1.3.1964	19.12.2003	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	260	Abdul Ghafar	GHS Majuhan	30.5.1974	11.2.2004	MA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	262	Ali Haider	GHS Sher Wan	25.4.1962	18.3.2004	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	263	Munammad Irshad	GHSS Bandi Dhundan	18.5.1976	22.12.2004	MA, M. Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	265	Abdul Qayyum Shah	GMS Sangrari	6.6.1971	22.12.2004	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	266	Abdur Rehman	GHS Satora	2.12.1974	22.12.2004	MA, M.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect
	267	Syed Hafeez Ahmad Shah	GMS Bandi Matrach	4.3.1975	22.12.2004	BA, CT	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SCT in (BPS-16), on regular basis with immediate effect

Promotion of Senior Teachers of District Abbottabad

10

15	Chanzeb	GMS Badhiar	3.2.1976	4.12.2003	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SDM in (BPS-16), on regular basis with immediate effect
16	Jamil Ahmed	GMS Tootni	13.2.1976	4.12.2003	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SDM in (BPS-16), on regular basis with immediate effect
17	M. Nisar	GMS Jan Dar Bari	12.3.1976	4.12.2003	BA, DM	Services are placed at the disposal of DEO (M) Abbottabad 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		171
1/3 Share of SAT Posts		57
Share of Promotion Quota of SAT		100%
Already Promoted to SAT		51
Posts Available for Promotion to SAT		7
Proposed AT for Promotion to SAT		7

Sr #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular AT	Qual:	Remarks
1	23	Naveed Iqbal	GHS No.3 Abbottabad	19.04.1975	10.04.1999	MA Arabic	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect
2	29	Abdul Majid	GMS Beri Bagla	10.4.1970	1.3.2000	MA Arabic	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect
3	33	Jamil Sabir	GMS Narduba	6.6.1975	4.12.2003	MA Arabic, B.Ed	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect
4	34	Muhammad Zubair	GHS Hadora Bandi	14.3.1976	4.12.2003	BA, Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect
5	37	Nisar Ahmed	GMS Kukmang	2.4.1977	4.12.2003	BA, Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect
6	38	Amjad Iqbal	GMS Banseri	11.7.1978	4.12.2003	BA, Alamia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect
7	39	Rashid Hassain Khan	GHS Malsa	15.3.1979	4.12.2003	MA, (Isl) Almia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SAT in (BPS-16), on regular basis with immediate effect

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

Total No. of Sanctioned Post of TT		183
1/2 Share of STT Posts		61
Share of Promotion Quota of STT		100%
Already promoted to STT		57
Posts available for Promotion to STT		4
Proposed TT for Promotion to STT		4

Sr #	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular TT	Qual:	Remarks
1	63	Saqib Rehman	GMS Tathi SB	10.8.1987	10.5.2014	MA, Islamiat	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in (BPS-16), on regular basis with immediate effect

Promotion of Senior Teachers of District Abbottabad

57	Shahab Ahmed	GMS Jhaffar	2.1.1987	10.5.2014	MA, Alalmia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in (BPS-16), on regular basis with immediate effect
58	Muhammad Shoaib	GMS Soma Kargha	12.12.1990	10.5.2014	MA, Alalmia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in (BPS-16), on regular basis with immediate effect
59	Zameer Sarwar	GHSS Bandi Thundaan	10.10.1979	10.5.2014	MA, Alalmia	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of STT in (BPS-16), on regular basis with immediate effect

ITEM No.5 PROMOTION OF PET (BPS-15) MALE TO THE POST OF SPET (BPS-16) ON REGULAR BASIS

Total No. of Sanctioned Post of PET	188
Share of SPET Posts	63
Share of Promotion Quota of SPET	100%
Already promoted to SPET	59
Posts Available for Promotion to SPET	4
Proposed PET for Promotion to SPET	2
Deferred of Promotion from PET to SPET	2

Sr. #	Sl. #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PET	Qual:	Remarks
1	40	Mushtaq Ahmed	GMS Tori	1.5.1973	1.3.2005	BA,JDPE	Services are placed at the disposal of DEO (M) Abbottabad for further adjustment against the post of SPET in (BPS-16), on regular basis with immediate effect
	41	Abdul Malik	GMS Tootni	20.7.1978	1.3.2005	BA,JDPE	Services are placed at the disposal of DEO (M) Abbottabad 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.
- 8 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

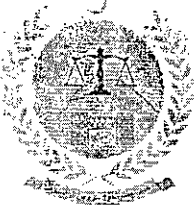
Endst: No 2658-63 / File No.1/Promotion SCT (BPS-16) Dated Peshawar the 28-12-2020

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Abbottabad
3. District Accounts Officer Abbottabad
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

(Signature)



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No: _____/ST Dated: ___/___/2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To,

The Director Elementary and Secondary Education,
Khyber Pakhtunkhwa Peshawar

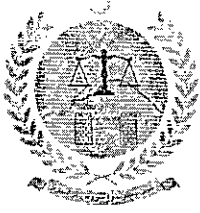
Subject: JUDGMENT IN SERVICE APPEAL NO. 7810/2020 OF Mr. NAVID IQBAL VS EDUCATION

I am directed to forward herewith a certified copy of Judgement dated 19.05.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As Above.


(WASEEMAKHTAR)

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

No: _____/ST Dated: ____/____/2022

To,

The Director Elementary and Secondary Education,
Khyber Pakhtunkhwa Peshawar

Subject: JUDGMENT IN SERVICE APPEAL NO. 7810/2020 OF Mr. NAVID IQBAL VS EDUCATION

I am directed to forward herewith a certified copy of Judgement dated 19.05.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As Above.


(WASEEMAKHTAR)

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

"B"

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

TB

No.

Appeal No. *7810* of 20 *20*

Naveed Iqbal Appellant/Petitioner

Versus

Through Secy. Edu. Dept. Pesh. Respondent

Respondent No. *3*

Notice to: - *Distt. Education office Edu. (Male) Abotatabad*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *18-1-2021* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this *9/11/20*

Day of *Decr.* 20 *20*

at Camp Court A Road

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

T.B

Appeal No. *7816* of 20 *20*

Musaddiqul Appellant/Petitioner

Versus

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

Respondent No. *2*

Notice to: - *Director of Ele: & Sec: Education*
Govt. of K.P. Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *18-1-2021* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

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

Day of *Dec*.....20 *20*

at Camp Court Ahead

15/12/2020

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

713

No.

Appeal No. 7810 of 20 20

N.ameed iqbal Appellant/Petitioner

Versus

Through Secy. Edm: KP St Pesh: Respondent

Respondent No. 2

Notice to: —

Govt. of KP through Secy. Edm:
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal ¹⁸⁻⁷⁻²⁰ on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this.....9/12.....

Day of.....DECE.....20 20

at Camp Court A Road

H. Mansoor

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

14/12