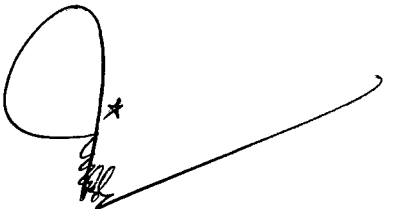


18.08.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Faheem, Assistant and Mr. Hussain, Assistant for the respondents present.

Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Adjourned by way of last chance. To come up for reply/comments on 06.10.2022 before S.B.




(Mian Muhammad)
Member (E)

06.10.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Abdul Qayum, ADEO (Lit:) for the respondents present.

Representative of the respondents submitted written reply/comments. Placed on file and a copy thereof handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, and arguments before the D.B on 28.11.2022.



(Mian Muhammad)
Member (E)

28/11/22

Deleted from the list
to come up for the same on 8/2/23

20.04.2022

Learned counsel for the appellant present and heard. Submits that vide Appellate Order dated 26.01.2022, the departmental appeal of the appellant was rejected against which he filed this appeal on 23.02.2022. As such he claimed that the departmental appeal is within time.

The appeal is admitted to full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comment on 30.06.2022 before S.B.

Rs-500/-

A. Uffiah
25/4/22



Chairman

30.06.2022

None for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General alongwith Abdul Qaum, ADEO (Lit) for respondents present.

Reply on behalf of respondents not submitted. Representative of the department seeks time for submission of written reply/comments. Request accepted. Notices be issued to appellant and his counsel. To come up for reply/comments on 18.08.2022 before S.B.

Noted by
Counsel
26/7/22



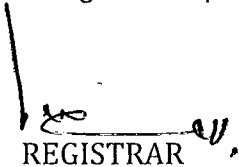

(Fareeha Paul)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 541 /2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/04/2022	<p>The appeal of Mr. Rehmat Salam resubmitted today by Mr. Asad Mahmood Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>20-4-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>noted Asad w/h</i></p>

The appeal of Mr. Rehmat Salam STT GHS TSD Dara Adamkhel Kohat received today i.e. on 23.02.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list not attached with the appeal.
- 2- Memorandum of appeal may be got signed by the appellant.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 5- Copy of impugned order/rules is not attached with the appeal which may be placed on it.
- 6- Copy of departmental appeal against the impugned order/rules is not attached with the appeal which may be placed on it.
- 7- Annexures/documents referred to in the memo of appeal are not attached with the appeal which may be placed on it.
- 8- Wakalat nama in favour of appellant be placed on file.
- 9- Three copies/sets of the appeal along annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

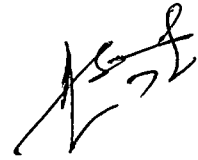
No. 537 /S.T,

Dt. 23-2- /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asad Mehmood Adv. Peshawar.

→ Copy of total sanctioned posts is requested from respondent's department. Time may kindly be extended.



**BEFORE KHYBER PAKHTUNWA SERVICE TRIBUNAL,
PESHAWAR**

Appeal No. 541 /2022

Rehmat Salam Government High School, TSD Dara Adamkhel, District Kohat

VERSUS

Director (E & SE) KPK, Merged Districts, Education Directorate, Peshawar and others.

INDEX

S.No.	Description	Annexure	Page No.
1.	<i>Memo of Appeal</i>	-----	01 - 03
2.	<i>Copy of Rules</i>	A	04 - 10
3.	<i>DEO letter dated 11.08.2021</i>	B	11
4.	<i>Seniority List</i>	C	12 - 14
5.	<i>Total sanctioned posts of SST (Biology/Chemistry)</i>	D	15
6.	<i>Departmental Appeal</i>	E	16
7.	<i>Rejection Order</i>	F	17

Through



Appellant



Asad Mahmood
Advocate High Court

**BEFORE KHYBER PAKHTUNWA SERVICE TRIBUNAL,
PESHAWAR.**

Appeal No. _____/2022

Rehmat Salam, STT, Government High School, TSD Dara Adamkhel,
District Kohat

APPELLANT
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 347

Dated 23/2/2022

1. Director (Elementary & Secondary Education) KPK, Merged Districts, Education Directorate, Peshawar.
2. Assistant Director (Estab), Merged Areas, Education Directorate, Peshawar.
3. District Education Officer (Male), Sub-Division Dara Adam Khel, Kohat.

RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER APPELLANT FOR PROMOTION AGAINST THE VACANT POST OF SST (BIOLOGY/CHEMISTRY) AND OBSERVE 4% QUOTA RESERVED FOR PROMOTION OF SR. THEOLOGY TEACHER/THEOLOGY TEACHER TO SST (BIOLOGY/CHEMISTRY) IN ITS TRUE LETTER AND SPIRIT AND AGAINST THE REJECTION ORDER DATED 26TH JANUARY, 2022 WHEREBY DEPARTMENTAL APPEAL IS REJECTED IN VIOLATION OF LAW AND PROMOTION RULES.

Filed to-day
Registrar

PRAYER:

ON ACCEPTANCE OF THIS APPEAL, THE REJECTION ORDER DATED 26TH JANUARY, 2022 MAY KINDLY BE SET ASIDE AND RESPONDENTS MAY KINDLY BE DIRECTED TO CONSIDER APPELLANT FOR PROMOTION AGAINST THE VACANT POST OF SST(BIOLOGY/CHEMISTRY) BY OBSERVING 4% SHARE FOR PROMOTION FROM THE TOTAL SANCTIONED POSTS OF

**SST (BIOLOGY/CHEMISTRY) AND APPLY THE SERVICE RULES IN
ITS TRUE LETTER AND SPIRIT TO MEET THE ENDS OF JUSTICE.**

Respectfully Sheweth,

1. The appellant was initially appointed as Theology Teacher (BPS-07) on 1st September 2003 and later on promoted Senior Theology Teacher on 20th February 2013. He has more than 19 years of commendable and unblemished service record at his credit.
2. Appellant is the only teacher acquiring qualification of Masters in Islamiat and B.Sc (Biology) in addition to his professional qualification of Bachelors in Education (B.Ed).
3. Nine (09) posts of SST (Biology/Chemistry) are lying vacant since long wherein 25% is to be filled through initial appointment and 75 % is to be filled through promotion. (Copy of Rules as Annexure-A).
4. Departmental Promotion Committee (DPC) was conducted on 24th August, 2020 And some vacant posts of SST (Biology/Chemistry) were filled through promotion on 8th December, 2020. Despite being recommended for promotion by DEO and availability of the Nine (09) posts of SST (Biology/Chemistry), appellant has been denied a promotion. (Copy of DEO letter dated 11.08.2021 as Annexure-B)
5. Appellant is the only Senior Theology Teacher having sufficient length of service and qualification of B.Sc (Biology/Chemistry) in the seniority list (Annexure-C) of Theology/Senior Theology Teacher (Male), to be promoted to the post of SST (Biology/Chemistry).
6. Respondents wrongly observed 4% share/quota for promotion from available vacant posts of SST (Biology/Chemistry) instead of **One Hundred and Eleven (111) total sanctioned posts of SST (Biology/Chemistry)** (Annexure-D) and wrongly refused appellant to promote for having 0.36% share in the promotion quota.
7. Appellant feeling aggrieved, filed departmental appeal (Annexure-E) against the impugned order which was rejected vide order dated 26th January, 2022. Hence, in the instant service appeal on the grounds inter alia: (Annex-F)

LEGAL GROUNDS:

- A. Respondents erred in observing 4% share for promotion from Sr. Theology Teachers/Theology Teacher to SST(Biology/Chemistry) from the **VACANT POSTS** instead of **111 TOTAL SANCTIONED POSTS**

tantamount to denial of promotion by putting aside section 9(1) of KP Civil Servant Act 1974.

- B. As per 4% share of TT's from 111 total sanctioned posts of SST(Biology/Chemistry), 4 posts are required to be filled by promotion amongst the Sr. Theology Teachers/ Theology Teachers.
- C. Deviation from the basic principles of promotion, i.e. on the basis of seniority cum fitness amongst the eligible teachers is illegal, illogical and violation of promotion rules.
- D. The act of denying promotion to appellant, despite his eligibility and availability of vacant posts, tantamount to violation of Article 25 & 38(e) of Constitution of Pakistan 1973 at respondent's end.
- E. Appellant possessing requisite qualification of B.Sc (Biology/Chem) with professional degree of B.Ed is otherwise entitled for promotion to subject post BUT denied due to non-application of service rules in its true letter and spirit and observing 4% share for promotion of Sr. Theology Teacher/Theology Teacher to SST (Biology/Chemistry) in the available 09 vacant posts instead of 111 total sanctioned posts.



Appellant

Through



Asad Mahmood
Advocate High Court

AFFIDAVIT

It is solemnly affirm on oath that contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



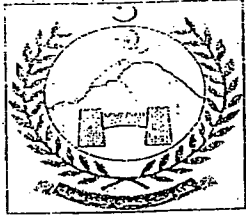
Deponent

ATTESTED



Annex-A B

4



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) 4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post failing in their promotion quota shall be filled by initial

5

				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and

16

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following Shall be substituted, in respective columns, namely:

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology),</p> <p style="text-align: center;">Or</p> <p>(b) (Physics, Maths "A" or "B" or Statistics)</p> <p style="text-align: center;">Or</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="padding-left: 40px;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No. 3;

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;

Provided that if no suitable candidate is available from amongst

Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

- (ii) twenty Five percent by initial recruitment.

Note:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

10

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)



OFFICE OF THE EDUCATION OFFICER

Initial Sub. Directorate Darra Kohat

Office No. 02, D.A. Kohat District & F.A. Kohat

No. 6061 / Dated: 11/08/2021

Annex - B

(11)

To:

The Additional Director
NMD Peshawar

Subject: APPEALS FOR DPC TO SST POSTS

I am reference to your letter No.11286 dated 26/07/2021 on the subjected noted above & to submit detail report regarding the promotion of below mention teachers.

1. Mr. Muhammad Saood Qari GHS Shpalkiwal. ✓
2. Mr. Rehmat Salam STT GHS Darra Adam Khel.

1. Departmental committee has been scheduled on 24/08/2020, at that time Mr. Muhammad Saood Qari GHS Shpalkiwal was not eligible for promotion as per rule due to less service. Therefore he was not honored for promotion. When another letter issued regarding DPC your office letter No.92959-93021 dated 12/10/2020 date for DPC extended up to 19/10/2020. Now he is legible for promotion on completion of 5 years of service.
2. The second applicant Mr, Rehmat Salam STT GHS Darra Adam Khel is BSc (Bio/Chem) B.Ed the share of TT is 4 % and total available posts by promotion is 09. TT share equal $4/100 \times 9 = 0.36$. There is no another candidate among AT.Qari,DM, so only one candidate has right to promote among Bio/Chem:. He is eligible for promotion as per criteria. Hence detail report is submitted for onward N/A as desired please.

DISTRICT EDUCATION OFFICER

ATSD DARRA KOHAT

No. 2415
Dated: 12/08/2021
Directorate of Education
Merged Areas KPK Peshawar

DA
Jhu
12/8

12

Annex-C

Final Seniority List of TT/STT Male Teachers in R/O TSD Darra Kohat Corrected up to 31/08/2021

S#	Sen: No.	NAME	FATHER NAME	School	D/O Birth	Designation	BPS	Qualification		D/O Ist: App:	D/O prom:	Domicile	Remarks
								Acad:	Prof:				
1	1	M.Khalil	M.Ishaq	GHS Shpalkiwal	3/3/1964	S.TT	16	MA	B.Ed	7/1/1990	20/02/2013		
2	2	Umer Saeed	Gulab Noor	GHS Suni Khel	18/11/77	S.TT	16	MA	B.Ed	18/10/2001	20/02/2013		
3	3	Zalib Gul	Ali Gul	GHS Akhurwal	11/9/1975	S.TT	16	MA		18/10/2001	20/02/2013		
4	4	Hayat Ullah	Nasrullah Jan	GHS Sheraki	18/10/77	S.TT	16	MA		18/10/2001	20/02/2013		
5	5	Nasir Khan	Raees Khan	GPS Shpalkiwal	17/05/76	S.TT	16	MA	B.Ed	12/9/2002	20/02/2013		
6	6	Rehmat Salam	Zareen Khan	GHS Dara Adam Khel	15/01/75	S.TT	16	MA	B.Ed	1/9/2003	20/02/2013		
7	7	Muqaddar Khan	Shah Jehan	GPS Sra Mela Bala	15/04/78	S.TT	16	MA		12/2/2000	30/05/2018		
8	8	Said Mir Khan	Lal Mir Khan	GHS Paya	20/02/75	S.TT	16	MA	B.Ed	17/10/2001	30/05/2018		
9	9	M.Riaz	Sunab Gul	GHS Guz Darra Jawaki	17/04/83	S.TT	16	MA	B.Ed	17/10/2001	30/05/2018		
11	11	Amjid Khan	Misal Khan	GHS Bosti Khel	25/03/81	S.TT	16	MA		3/9/2003	30/05/2018		
12	12	Sher Faraz	Said Amin	GPS Feroz Mela	4/1/1975	S.TT	16	MA		1/11/2005	30/05/2018		
13	13	M.Usman	Malik Din	GPS Sheraki No2	14/02/85	S.TT	16	MA		1/9/2006	30/05/2018		
14	14	Manzoor Rehman	Samand Khan	GHS T.I Khel	12/10/1974	S.TT	16	SSC	S/Alamiya	3/2/2010	30/05/2018		
15	15	Jehan Zeb	Sadiq Akbar	GPS Ghariba	28/06/78	S.TT	16	BA	S/Alamiya	3/2/2010	30/05/2018		
16	16	Said Moeen	Umer Din	GMS Jammu Jawaki	20/04/80	S.TT	16	MA	S/Alamiya	3/2/2010	30/05/2018		
17	17	Shahid Ullah	Khan Akber	GPS Ara Khel	4/7/1984	S.TT	16	BA	S/Alamiya	3/2/2010	30/05/2018		
18	18	M.Wali	Zabta Khan	GHS Shin Dhand	1/4/1985	S.TT	16	FA	S/Alamiya	3/2/2010	30/05/2018		
19	19	M.Akram	Khan Khel	GPS Landi wal	2/1/1981	S.TT	16	MA Is		24/04/2015			
20	20	FalakNaz	Naeem Gul	GMS Donga Taimer	15/08/83	S.TT	16	MA Is		24/04/2015			
21	21	Mehboob Alam	Zer Akbar	GPS Asif Khel Paya	18/03/85	S.TT	16	MA Is		24/04/2015			
22	22	Imdad Ullah	Khalil Ullah	GPS Landi Khel	20/03/62	TT	15	SSC	S/Yafta	1/12/1982			
23	23	Abdul Rauf	Abdur Raziq	GPS Surak	9/5/1963	TT	15	SSC	S/Yafta	1/11/1984			
24	24	M.Nawaz	Habib Shah	GPS Suni Khel	16/02/61	TT	15	FA	S/Yafta	26/01/1987			
25	25	Sharif Khan	Sher Alam	GPS Kohiwal	8/12/1966	TT	15	BA	S/Yafta	28/10/1989			
26	26	Hazrat Din	Ahmad Gul	GPS Mullah Khel	1/5/1972	TT	15	FA	S/Yafta	11/9/1990			
27	27	Fazl e Ahad	Abdul Khaliq	GPS Sultan Khel	1/12/1965	TT	15	SSC	S/Yafta	18/04/1992			
28	28	M.Ilyas	M.Ishaq	GPS Dingan	1/4/1962	TT	15	BA	S/Yafta	1/12/1993			
29	29	Sher Habib	Said Habib	GPS Amal Gul	10/2/1971	TT	15	BA	S/Yafta	1/9/1994			

13

30	30	Nawaz Khan	Rehmat Shah	GPS Azadi Mela	10/5/1972	TT	15	FA	S/Yafta	1/9/1994			
31	31	Abdur Rehman	Matwali Shah	GPS Sra Mela	12/3/1976	TT	15	SSC	S/Yafta	1/9/1994			
32	32	Said Nawaz	Aman Shah	GPS Alam Khel	1/7/1971	TT	15	SSC	S/Yafta	18/09/1994			
33	33	Rab Nawaz	Mehmood Khan	GPS Zor Kaly	14/04/64	TT	15	FA	S/Yafta	5/10/1994			
34	34	Siraj Gul	Sawab Gul	GPS Bagh Kaly	1/9/1975	TT	15	SSC	S/Aliya	6/1/1995			
35	35	Noor Rehman	Gul Sahib Shah	GPS Bosti Khel	13/06/77	TT	15	BA	S/Yafta	2/10/1995			
36	36	M.Naeem Gul	Naseem Gul	GPS Sheraki Bala	11/2/1974	TT	15	BA	S/Yafta	31/10/1995			
37	37	Atlas Khan	Noor Habib	GPS T.I Khel	4/11/1968	TT	15	FA	S/Yafta	6/12/1995			
38	38	Muzeebur Rehman	Amanullah Khan	GPS Behram Khel	1/2/1972	TT	15	FA	S/Yafta	19/12/1995			
39	39	Riaz Hussain	Wakil Khan	GPS Taimer Khel	1/1/1972	TT	15	FA	S/Yafta	21/12/1999			
40	40	Bait Ullah	Ain Khan	GPS Jammu	8/2/1979	TT	15	BA	S/Aliya	28/03/2000			
41	41	Sharif Hussain	Akram Khan	GPS Paya	15/09/81	TT	15	SSC	S/Yafta	17/10/2001			
42	42	Najeem Khan	Amir Khan	GPS Drabkas	16/01/72	TT	15	BA	S/Yafta	18/10/2001			
43	43	Shah Nawaz Khan	Saif Ur Rehman	GPS Nazim Kaly	6/6/1968	TT	15	MA Is	B.Ed	1/9/2003			
44	44	Amir M.Khan	M.Yousaf	GPS Kohiwal No2	15/07/80	TT	15	FA	S/Yafta	1/9/2003			
45	45	Said Rasool	Haji Akbar	GPS Samandi Mela	11/4/1981	TT	15	BA	S/Yafta	1/9/2003			
46	46	Ahmad Din	Khial Din	GPS Sheraki	1/12/1974	TT	15	SSC	S/Yafta	8/10/2003			
47	47	Wajid Gul	Khan Hassan	GPS Bazi Khel	5/2/1986	TT	15	BA	S/Yafta	1/9/2006			
48	48	Farooq Abdullah	Banaras Khan	GPS Ibrahim Khel		TT	15	MA	Islamiyat	29/05/2020			
49	49	Hazrat Nabi	Khan Hassan	GMS Kohiwal		TT	15	MA	Islamiyat	29/05/2020			
50	50	Muhammad Jamal	Said Hawas Khan	GPS ZorAkhur		TT	15	MA	Islamiyat	29/05/2020			
51	51	Faiz Ullah	Mohabat Khan	GPS Amal Gul Killay		TT	15	MA	Islamiyat	29/05/2020			
52	52	Safi Ullah Shah	Shah Hussain	GPS Pirwal Khel		TT	15	MA	Islamiyat	29/05/2020			
53	53	Muhammad Asif	Gul Muhammad	GPS Chattar		TT	15	MA	Islamiyat	29/05/2020			
54	54	Alim Khan	Khan Akbar	GPS Sarwar Khel		TT	15	MA	Islamiyat	29/05/2020			
55	55	Syed Umer	Shah Zar Khan	GPS Depookillay		TT	15	MA	Islamiyat	29/05/2020			
57	57	Noor Sher	Muhammad	GHS Shin Dhand		TT	15	MA	Islamiyat	29/05/2020			
59	59	Ubid Ullah	Khan Akbar	GPS Shin Dhand		TT	15	MA	Islamiyat	29/05/2020			

60	60	Muhammad Aamir	Muhammad Tahir	GPS Feroz Khel		TT	15	MA	Islamiyat	29/05/2020			
61	61	Jehangeer Khan	Sonab Gul	GMS Guz Darra		TT	15	MA	Islamiyat	29/05/2020			
62	62	Nasib Khan	Akram Khan	GPS Surak Toor Chapper		TT	15	MA	Islamiyat	29/05/2020			
63	63	Muhammad yaseen	Sahib Zada	GHS Toor-Chapper		TT	15	MA	Islamiyat	29/05/2021			
64	64	Habib Ullah	Mardan Gul	GPS Habib Ullah		TT	15	BA	Islamiyat	29/05/2022			
65	65	Muhammad Kamran	Hashim Ali Khan	GPS Mazeed Khel		TT	15	BA	Islamiyat	29/05/2020			
66	66	Abdul Qadeer	Abdur Rashid	GPS Shpalkiwal		TT	15	BA	Islamiyat				
67	67	Muhammad Rafiq	Sher Muhammad	GPS Toor Chapper		TT	15	MA		29/05/2020			

CERTIFICATES

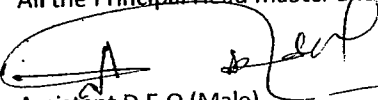
1. That the said seniority is not subjadice in court
2. that said senirotiy is final and no apeal is panding against the seniority list in this office.

(Adul Salam)
District Education Officer
TSD Darra Kohat

Endst NO _____ Dated 11-01-2022

Copy of the above is to the :-

All the Principal Head Master and head teachers


Assistant D.E.O (Male)
TSD Darra Kpohat

(Adul Salam)
District Education Officer
TSD Darra Kohat

District Education Office Kohat

All sanction SST Cadre posts

S.No	Designation	BPS	Sanction
1.	SST (G)	16	272
2	SST (P/M)	16	110
3	SST (B/C)	16	111
Total			493

District Education Officer (Male)

Kohat

ANNEX-1

15

To

The Director Of Education
Newly Merged District Peshawar

Subject: Appeal for Promotion to SST (Bio, Chem) in DPC 2020
TSD Darra Kohat

Respected Sir,

With due respect I submit my application for the above cited subject due to the following facts.

- 1) I am working against STT at GHS Darra Adam Khel since September 2003.
- 2) I did B.SC in (Bio, Chem) and I am teaching the same subjects to 9th and 10th Classes till now.
- 3) I am the senior most among the TT list in TSD Darra Kohat.
- 4) My name was selected and recommended for the SST (Bio, Chem) by the DEO office TSD Darra Kohat. But unfortunately, my order is still awaited while all promotion orders for other merged districts have been issued. You are requested to issue my promotion order for SST (Bio, Chem) as I am the singal candidate qualified for this post from TSD Darra Kohat.

Hoping for favourable consideration sir, thanks.

Your obedient servant
Rehmat Salam SST (Bio, Chem)
GHS Darra Adam Khel



DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NO. 11528 DATED 26/11/2022

Annex-P

(17)

To

The District Education Officer (Male),
SD Dara Adam Khel Kohat

Subject: - APPEALS FOR DPC TO SST POSTS.

I am directed to refer to your letter No. 6061 Dated 11-08-2021 on the subject cited above and to state that there were Twelve (12) posts of SST (P/M) Male vacant in your respective Sub Division, out of which 03 posts were allocated for Initial Recruitment @ 25 % Quota and 09 posts for Departmental Promotion @ 75% Quota. The share of TT @ 04% Quota and Qari @ 03% Quota is just 0.48 & 0.36 respectively, which is not applicable as per the existing rules and policy.

Keeping in view the above mentioned facts, the Competent Authority is pleased to reject the appeals in respect of the following teachers.

1. Mr. Rahmat Salam STT GHS Dara Adam Khel Kohat.
2. Muhammad Saood Qari GHS Shpalkiwal SD DAK Kohat.

I am further directed to ask you to inform the teachers concerned accordingly.

Assistant Director (Estab)
Merged Areas

Endst: No. 11528/1

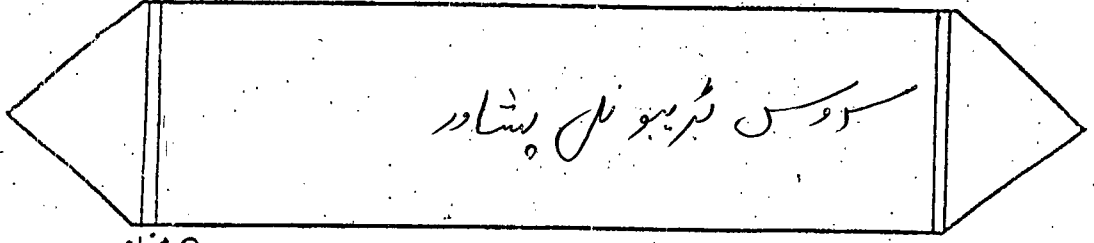
Copy of the above is forwarded to the:-

1. PA to Director Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab)
Merged Areas

ANNEX (F)

بعدالت



2ء مخانب

بنام

Rehmat
Salam
Vs

موزخہ
مقدمہ
دعویٰ
جرم

Education Dept

باعث تحریر آنکہ

مقدمہ مشدرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام پشاور کیلئے اسد محمود ایڈووکیٹ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالتہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ تیا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جاندا التوائے مقدمہ کے سب سے وہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

Accepted

(Signature)

20

ماہ

المرقوم

دستِ سلام

الع باب

کے لئے منظور ہے۔

بمقام

“B”

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

S-B

No.

Recd

Appeal No. 541 of 20

Rehmat Salam Appellant/Petitioner

Versus

Director E&SE K.P. Pesh. Respondent

Respondent No. 3

Notice to:

Distt. Education officer (Male) Sub-Division
Dara Adam Khels Kohat.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 30/6/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 11/5/2022

Day of May 2022

For Reply

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

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

"B"

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

S.B

No.

Appeal No. 541 of 20 22

Rehmat Salam Appellant/Petitioner

Versus

Director E & SE Kp Pesh. Respondent

Respondent No. 1

Notice to: —

Director (E & SE) KPK Merged Dist.
Edu Directorate Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal ^{*on} 30/6/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

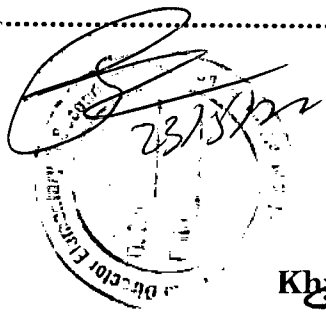
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition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

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

Given under my hand and the seal of this Court, at Peshawar this 11.06.22

Day of Monday 2022

(For Reply)



[Signature]
Registrar,

**Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

"B"

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

No.

Appeal No. 541 of 2022

Rehmat Salam Appellant/Petitioner

Versus

Director, ESSE Kp Peshawar Respondent

Respondent No. 2

Notice to:

Assistant Director (Estab) Merged Areas,
 Education Directorate Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 30/6/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with 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 11/5/22


Day of May 2022.

(For Reply)

Received.

23/5/22


 Registrar,


 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

S.A No. 541/2022

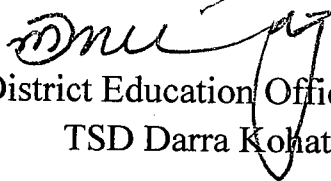
Mr. Rehmat Salam STT, Government High School, TSD Darra Adam Khel,
District Kohat**Appellant**

VERSUS

1. The Director, (Elementary & Secondary Education) KPK, Merged District,
Education Directorate, Peshawar & others.....**Respondent**

INDEX

S No.	Documents	Annexure	Page
1	Para wise Comments & Affidavit		1-2
2	Policy	A	3 - 9
3	Working Paper	B	4 10


District Education Officer (M)
TSD Darra Kohat

D

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

S.A No. 541/2022

Mr. Rehmat Salam STT, Government High School, TSD Darra Adam Khel,
District Kohat **Appellant**

VERSUS

1. The Director, (Elementary & Secondary Education) KPK, Merged District, Education Directorate, Peshawar.
2. Assistant Director (Estab), Merged Area, Education Directorate, Peshawar
3. The District Education Officer (male), Sub Division Darra Adam Khel, Kohat..... **Respondent**

PARA WISE COMMENTS ON THE BEHALF OF RESPONDENT NO. 1 to 3.

Preliminary Objection

- i. That the Petitioner has got no cause of action, locus standi to file the instant petition.
- ii. That the Petitioner has concealed material facts from honorable Tribunal.
- iii. That the Petitioner has not come to this honorable Tribunal with clean hands.
- iv. That the Petitioner case is not maintainable.
- v. That the Petitioner is based upon malicious/vexatious and frivolous ground.
- vi. That the Petitioner is estopped by his own conduct.
- vii. That the appeal of the appellant is badly time bared.
- viii. That the appeal is bad for misjoinder and non-joinder of necessary parties.

FACTS:

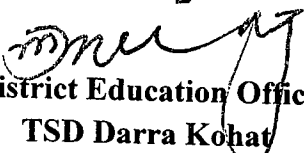
1. Pertinent to record.
2. Pertinent to record.
3. Pertinent to record.
4. Incorrect: The share of STT is equal $4/100 \times 6.75 = 0.27$ which is not full filling the criteria of promotion from STT to SST. The promotion detail is under for SST. Total vacant posts = 9, 25% for initial recruitment share = $9/100 \times 25 = 2.25$, 75% for promotion share = $9/100 \times 75 = 6.75$. It is further divided at the category of SCT share = $6.75/100 \times 40 = 2.7$, further divided at the category of PSHT to SST share = $6.75/100 \times 20 = 1.35$, further divided at the category of SAT, STT, SDM to SST share = $6.75/100 \times 4 = 0.27$, further divided at the category S Qari to SST share = $6.75/100 \times 3 = 0.20$. Policy is attached as **annexure A** and working paper is attached as **annexure B**.
5. Incorrect: As stated in Para 4.
6. Incorrect: As stated in Para 4.
7. Incorrect: As stated in Para 4.


Grounds

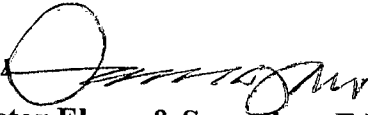
- A. Incorrect: As stated in Para 4.
- B. Incorrect: As stated in Para 4.
- C. Incorrect: As stated in Para 4, and no violation is made against the appellant.
- D. Incorrect: As stated in Para 4.
- E. Incorrect. As stated in Para 4.

PRAY.

In the light of above legal and factual position it is humbly requested that the instant petition/appeal is baseless, may be dismissed please.




District Education Officer
TSD Darra Kohat
Respondent No. 3

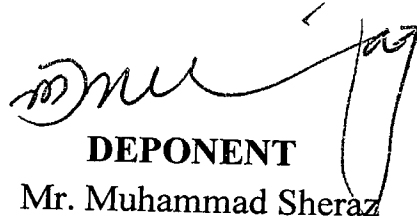

Asst: Director NMD
Khyber Pakhtunkhwa Peshawar
Respondent No.2


Director Elem: & Secondary Education
Khyber Pakhtunkhwa Peshawar
Respondent No. 1

AFFIDAVIT

I Mr. Muhammad Sheraz DEO TSD Dara Kohat, do here by affirm and declared that the contents of para wise comments regarding the service appeal No. 541 are true, correct and nothing has been concealed from this Honorable Service Tribunal Khyber Pakhtunkhwa, Peshawar.



06-10-22


DEPONENT
Mr. Muhammad Sheraz
District Education Officer (M)
TSD Darra Kohat

4

Annex-A



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post failing in their promotion quota shall be filled by initial

*Asst. District Education Officer
ISD Peshawar*

				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education. (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and

S. K. S. S. S.
Asstt. District Education Officer
TSD Daira Kohat

14

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

1	2	3	4	5
<p>1B.</p>	<p>Secondary School Teacher (BPS-16)</p>	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology),</p> <p>Or</p> <p>(b) (Physics, Maths "A" or "B" or Statistics)</p> <p>Or</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	<p>21 to 35 years.</p>	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

Handwritten signature
 Asstt. District Education Officer
 ISD Datta Kohat

6

ALT
A
K

Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

- (c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

①

AH
Kestec
Kestec

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

SKED
A b
Asst. District Education Officer
TSD Datta Kohal

Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty Five percent by initial recruitment.

Note:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

CC

WORKING PAPER 2021

A. Promotion to Senior Teacher

ITEM No.1 PROMOTION OF STT (BPS-16) MALE TO THE POST OF SST BIO/CHEM: (BPS-16) ON REGULAR BASIS.

The case of promotion of STT (BPS-16) to SST BIO/CHEM: (BPS-16) was considered and the DPC decided as under.

B. Promotion to SST BIO/CHEM:

C.

ITEM NO.1 PROMOTION OF STT TO THE POST OF SST BIO/CHEM:) BPS-16 ON REGULAR BASIS.

The case of promotion of STT Male to SST SST BIO/CHEM BPS-16 was considered and the DPC Decided as under

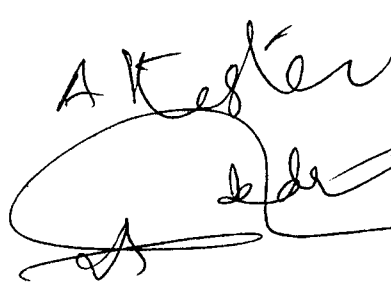
Total No of vacant post at SST BIO/CHEM:	09
25% Initial Recruitment Quota	2.25
75% Promotion Quota	6.75
40% CT/SCT Promotion Quota to SST BIO/CHEM:	2.7
20% PST/SPST/PHST Promotion Quota to SST BIO/CHEM:	1.35
4% D.M/SDM Promotion Quota to SST BIO/CHEM:	0.27
4% TT/STT Promotion Quota to SST BIO/CHEM:	0.27
4% AT/SAT Promotion Quota to SST BIO/CHEM:	0.27
3% S.Qari Promotion Quota to SST BIO/CHEM:)	0.20
Proposed for promotion STT TO SST BIO/CHEM:	0

S#	Sr: No	Name of Official	Name of School	Date of Birth	Date of Appn: As Re Reg: PST	Academic & Professional Qualification	Remarks
01	06	Rehmai Salam	GHS Darra Adam Khel	15/01/1975	01/09/2003	B.Sc. Bio Chem: B.ED	

CERTIFICATE

Note: (specimen of Certificate to be furnished by every DEO with the submission of promotion cases)

1. All the STTs (Male/Female) have been included in the panel for promotion to SST BIO/CHEM posts.
2. All the STTs (Male/Female) hold the post on regular basis and none of them is on adhoc/acting charge/contract basis
3. All the STTs (Male/Female) have completed the required minimum length of qualifying service and qualifications as required for promotion; to SST BIO/CHEM under the rules.
4. None of them is deputation of any origination under the Federal/Provincial/Autonomous International Origination.

A Kester

 District Education Officer
 TSD Darra Kohat

[Handwritten marks]