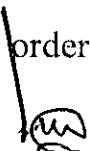


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 1759/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/12/2022	<p>The appeal of Mr. Fazal Wajood resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Fazal Mawjood PET GHS Ranyal District Shangla received today i.e. on 16.11.2022 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 is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Appeal may be page marked according to the Index of the appeal.
- 5- Affidavit may be got attested by the Oath Commissioner.
- 6- Copies of impugned and old rules mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 7- Copy of promotion notification mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 8- Departmental appeal having no date be dated.
- 9- Annexures-A&B of the appeal are illegible which may be replaced by legible/better one.
- 10- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal

No. 3217 /S.T,

Dt. 17/11 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Noor Muhammad Khattak Adv. Pesh.

R/sir,

Resubmitted needful be done,

-   
2/12/22

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

SERVICE APPEAL No. 1759 /2022

FAZAL MAWJOOD

VS EDUCATION DEPTT:

**I N D E X**

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with Affidavit	.....	1 - 3
2.	Appointment order & Promotion order	A	4 - 7
3.	Copy of the impugned rules and promotion notification dated 08.12.2020	B & C	8 - 19
4.	Copies of the old rules dated 13.11.2012	D	20 - 34
5.	Copy of the Educational Testimonials	E	35 - 41
6.	Copies of the Departmental Appeal and Registry Receipt	F	42 - 43
7.	Vakalatnama		44

  
APPELLANT

Through:

  
NOOR MOHAMMAD KHATTAK  
ADVOCATE  
SUPREME COURT OF PAKISTAN

- 1 -

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

APPEAL NO. 759 / 2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1956

Date: 16-11-2022

Mr. Fazal Mawjood, P/T (BPS-15),  
GPS Alpurai No.2, District Shangla.

..... APPELLANT

VERSUS

- 1- The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

..... RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 24-07-2014 WHEREBY THE 4% PROMOTION QUOTA RESERVED FOR PET CADRE HAS BEEN DONE AWAY IN VIOLATION OF SECTION 09 OF THE CIVIL SERVANT ACT 1973 READ WITH RULE-7 OF THE APT RULES, 1989 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

**That on acceptance of this appeal the impugned notification dated 24-07-2014 may very kindly be rectified/modified in the light of the notification dated 13.12.2012 to the extent of allocation of quota for the cadre of the appellant i.e. PET cadre may kindly be restored and the appellant may kindly be considered for promotion to the post of SST BPS-16 with all back and consequential benefit. Any other remedy which this august Tribunal deems fit, may also be awarded in favor of the appellant.**

**R/SHWETH:**

**ON FACTS:**

1. That the appellant was appointed against the post of PST BPS-07 vide order dated 24.06.1997 and was subsequently promoted to the post of Physical Education Teacher (PET) BPS-15 vide order dated 31.10.2011 and has been performing his duties with devotion and up to the entire satisfaction of his superiors. Copy of the initial appointment order dated 24.06.1997 and Promotion Order dated 31.10.2011 is attached as Annexure..... **A.**

2. That other colleagues of the appellant belonging to other cadres have been promoted to the post of SST BPS-16 while the appellant was ignored. Having no prospects of promotion given by the department through the impugned rules dated 24.07.2014. Copy of the impugned rules and promotion notification dated 08.12.2020 are attached as Annexure .....**B & C.**
3. It is pertinent to mention here that as per notification dated 13.11.2012 there was four (4) percent quota reserved for PET cadre in the promotion of SST BPS-16 with at least 5 years of service and having qualification in column 3 of the appendix to the service rules i.e. second class bachelor degree with two subjects as chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from a recognized university; or M.A in education or Bachelor degree in Education from a recognized university. Copies of the old rules dated 13.11.2012 is attached as Annexure.....**D.**
4. That the appellant fulfills the above mentioned criteria and the petitioner has the requisite qualification to be promoted to the post of SST BPS-16 under the old rules dated 13.12.2012 but to the ibid impugned notification the promotion quota has been done away in violation of section 9 of the civil servant act 1973 read with rule-7 of the APT Rules, 1989. Copy of the Educational Testimonials is attached as Annexure .....**E.**
5. That the appellant feeling aggrieved from the impugned notification dated 24.07.2014, preferred departmental appeal dated 16.07.2022 to the competent authority but in vain. Copies of the Departmental Appeal and Registry Receipt are attached as annexure.....**F.**
6. That the appellant feeling aggrieved and having no other remedy filed the instance service appeal on following grounds inter alia.

**GROUND:**

- A- That the impugned notification dated 24-07-2014 whereby the 4% promotion quota reserved for PET cadre that has been done away by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/rectified.
- B- That appellant has not been treated by the respondents Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That impugned notification dated 24-07-2014 whereby the 4% promotion quota reserved for PET cadre has been done away by the respondents is also violative of Section 24(a) of the General Clauses Act, 1897.

- D- That, the treatment meted out to the appellant is clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- E- That the respondents acted in arbitrary and malafide manner while issuing the impugned notification.
- F- That not allocating promotion quota to the post of SST (BPS-16) to the cadre of the appellant is violative of section-9 of the Civil servant Act, 1973 read with rule 7 of the APT rules, 1989.
- G- That the action and inaction of the respondents is violative of Article 38 (e) of the Constitution of Pakistan, 1973.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

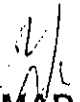
It is therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.

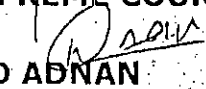
Dated: 15.11.2022


**APPELLANT**



  
**FAZAL MAWJOOD**

**THROUGH:**

  
**NOOR MUHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**

  
**WALEED ADNAN**

  
**UMAR FAROOQ MOMAND**

  
**MUHAMMAD AYUB**  
&   
**KHANZAD GUL**  
**ADVOCATES**

**AFFIDAVIT**

I, Fazal Mawjood, PET (BPS-15), GPS Alpurai No.2, District Shangla, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

  
**DEPONENT**

1/11 1st Order of P.S.T Appointment

OFFICE OF THE DISTRICT EDUCATION OFFICER (D) PRIMARY SWAT DISTRICT SWAT

APPOINTMENT

"A"

4-

Consequent upon their selection by the Departmental selection committee the District Education Officer (D) Primary Swat, has been pleased to appoint the following trained P.T.O candidates at the schools noted against their names in PPS-7 S.No. 1490-81-2695 plus usual allowances as admissible under the rules with immediate effect subject to the terms and conditions given below:-

S.No.	S.N.O. Name/Name & Home Address	D/O Birth	NO. OF Merit/ Marks	School where posted	Remarks
	Anwar Zeb S/O	1.4.78	16/55	GPS. Chir Dandai	Against V.I Post
	Sherin Zeb R/O Kotkay				
	Saeedullah S/O	18.4.78	11/55	GPS. Hawalal	-do-
	Mohd Sarejan R/O Namoni				
	Tareq Mawlood S/O	12.5.69	12/55	GPS. Jaba Dandai	-do-
	Mohd Tameer R/O W.K. Kotkay				
	Bakht Yar Khan S/O	9.2.75	17/44	GPS. Liloi	-do-
	Shammar Rehman R/O Bagorai				
	Hazrat Ali S/O	15.4.71	14/52	GPS. Labora	-do-
	Libas Miran R/O W. Kotkay				
	Sanaullah S/O Hazar Band R/O Lilowmai	1.5.73	15/46	GPS. Molcar	-do-
	Jamshaid Ali S/O	10.3.75	16/45	GPS. Bawlan	-do-
	Bakhti Rawan R/O W.K. Kotkay				
	Inshanullah S/O	24.3.75	17/46	GPS. Jaba Dandai	-do-
	Sarfraz R/O W.K. Kotkay				
	Abdul Sattar R/O	1.10.69	16/45	GPS. Shage Banda	-do-
	Mohd Afarin R/O Besham				
	Rajmul Haq S/O	2.1.72	19/45	-do-	-do-
	Amir Rahman R/O Korak				
	Khairun Rahman S/O	3.3.72	20/45	GPS. Jaba Dandai	-do-
	Abdul Waheed R/O W.K. Kotkay				
	Misbahul Islam S/O	7.4.74	21/45	GPS. Bar Lasbkar	-do-
	Mohd Faris Jan R/O W.K. Kotkay Shahpur				
	Amir Samad Khan S/O	21.4.73	28/45	GPS. Dara Manar	-do-
	Haseen Shah R/O Chagan				
	Gul Amin S/O	3.3.75	22/45	GPS. Munjai Manara	-do-
	Mohd Zaman R/O Lilowmai				
	Zabul Abidin S/O	1.6.71	23/44	GPS. Dand Dandai	-do-
	Taj Mohd R/O Lilowmai				
	Abdul Wahab S/O	5.73	21/44	GPS. Kandow Kara	-do-
	Abdur Rahman R/O Lilowmai				

Next Page NO.2.

Appointment order of P.S.T.

CONDITIONS

1. They will be governed by such rules or regulations as may be prescribed by the Govt. from time to time for the category of the Govt. servant which they belong.
2. Their service will may be terminated on one month notice from either side in case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the post within one month of the issue of this notification.
4. Their enterece seniority will be determined in accordance with the merit of Departmental Selection Committee.
5. Charge report should be submitted to all concerned.
6. They shall be probationary period of two years and will have to pass Departmental examination. In case that candidate failed to qualify the Departmental Exam. he will be given one more chance. If he fails again, then his services will be terminated. On approval/availability of trained teacher the holder of untrained teacher occupies the post will terminated.
7. The original certificates/Degree should be checked and verified from the concerned University /BISE/IDE, and Islamic Madrasah concerned before handing over charge.
8. Service books of the teacher must be prepared complete in all respect before handing over charge.
9. The declaration of assets should be obtained from them immediately & placed on record.
10. They are required to produce health & age certificate from the Medical Authorities concerned before hand taking over charge.
11. Charge should not be given to the even candidate. His case for age relaxation is sent to the concerned quarters.
12. For the transfer before the completion of tenure will dis-qualify him from the service.
13. No TA/DA is allowed.
14. An undertaking shall be obtained from holder of post before hand that they will serve the dept. for atleast 5 years unless he/they are selected by Public Service Commission for any post.
15. In case of person appointed as an untrained teacher he will have to pass requisite training examination within a period of 4 years, failing which his services will be terminated.

NOTE:-

Complete information of each category (Separately) in consolidated form in the prescribed proforma (Attached) alongwith charge report be submitted by the lower offices to the Director of P. & E. Education/DIO (H) Primary within a week positively.

(Said Ali Shah)  
DISTRICT EDUCATION OFFICER (H)  
PRIMARY SWAT, DISTRICT SWAT.

3168-3218  
Enst. No. ---

Dated, 24-8-1977

- Copy forwarded for information to the:
- 1- Director of Primary Education, Peshawar.
  - 2- P.A to Secretary to Govt. of NWFP, Peshawar.
  - 3- P.A to Director of Primary Education, NWFP, Peshawar.
  - 4- District Accounts Officer Swat.
  - 5- Sub-Div. Education Officer (H) Saidu, Chahid & Shangle Alpurai Swat.
  - 6- Officials concerned.
  - 7- M/ File

DISTRICT EDUCATION OFFICER (H)  
PRIMARY SWAT, DISTRICT SWAT.



Promoted From PST to PET



**OFFICE OF THE  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION SHANGLA**  
CONTACT NO. (0994) 850639, 851108- Fax # 851108

6-

**OFFICER ORDER/APPOINTMENT:**

Consequent upon the recommendation / approval by the District Committee (Elementary & Secondary Education) Shangla in its meeting held on 31/10/2011 the undersigned has been pleased to appoint the following PETs on 80% fresh recruitment and 20% by promotion amongst PSTs in BPS-09 (Rs.6200-380-17600) against the vacant posts of PET (Male) mentioned against their names (as per amended regular / contract policy and permanent in case of in service) with immediate effect in the interest of public service

**80% Fresh Recruitments PET (Male)**

#	Name	Father Name	Union Council	Merit Position	School / Station where posted
1	Luqman Shah	Feroz Shah	Alpurai	49.9880	GMS Dawool
2	Zahidur Rahman	Tajuddin	Lilownai	48.2321	GMS Kuz Balkor
3	Hussain Ahmad	Hidayatullah	Lilownai	47.4158	GMS Maira
4	Khalid Jameel	Abdul Haroon	Shapur	45.2641	GMS Larai Pir Khana
5	Shaukiallah	Muhammad Zair	Dherai (A)	45.0351	GMS Gunager
6	Aamir Rahman	Fateh Muhammad	Alpurai	44.8827	GHS Koinang

**PET 20% PROMOTED FROM PST (MALE)**

#	Name	Father Name	Qualification	Present School	School / Station where posted
1	Fazal Maulud	M. Ismaeel	M/W IDPE	GPS Alpurai #2	GHS Ranyal
2	Fazal Alam	Panda Mand	M/W IDPE	Marwar Dasi	GMS Dar Balkor

**TERMS AND CONDITIONS:**

- 1) The appointment is purely on contract basis against BPS-09 plus usual allowances as admissible under the rules.
- 2) The probation period of appointment shall be two years.
- 3) The appointment of the above candidates as made as regular civil servants for all intents and purposes except for purpose of pension and gratuity. They shall be entitled to receive such amount contributed by him towards the contributory provident fund, along with contribution made by the government, to their account in the said fund, in the prescribed manner, in lieu of pension and gratuity.
- 4) The service of the above candidates will be liable to termination at any time without assigning any notice / reason. In case of resignation without notice, two month pay and allowances if any shall be forfeited to Govt. treasury.
- 5) The candidates should join their posts within fifteen days of the issue of their orders. The Principal / Head Master / Head Mistress / DDO concerned should furnish a certificate to the effect that the candidates have joined the posts within stipulated period of time; failing which their appointment will be automatically treated as cancelled.
- 6) The fresh candidates will not be handed over charge, if their age exceeded 35 or below 18 years.
- 7) The appointment is subject to the production of health and age certificate from the medical superintendent concerned.
- 8) The Principal / H/M / DDO concerned should check their original certificates / domicile etc before handing over charge and attested copy of the agreement signed on both side be obtained for further verification of certificates / Degrees from concerned Institution.
- 9) Charge report should be submitted in duplicate to all concerned.
- 10) No TA / DA is allowed.

Promoted from PST to PET

-7-

- 11) The candidate will be governed by the terms and condition of service mentioned in agreement/enforced
- 12) The Principal / H/M / BDO concerned should obtain Surety Bond as well as agreement as to obey the contract policy and will have no right to challenge the contract policy in court of law.


Sd  
(ABDULLAH)  
EXECUTIVE DISTRICT OFFICER,  
ELEMENTARY & SECONDARY EDUCATION/  
CHAIRMAN DSC (E&SE) DISTRICT SHANGLA.

Dated. 31/10/2011

Endost; No. 1663-72

Copy of the above is forwarded to:

- 1) The PS to Secretary Elementary & Secondary Education Department Khyber Pukhtunkhwa, Peshawar.
- 2) The Director Elementary & Secondary Education Khyber Pukhtunkhwa, Peshawar.
- 3) The District Coordination Officer, Shangla.
- 4) The District Account Officer, Shangla.
- 5) All the concerned Principals / Head Masters / Head Mistresses / DDO Concerned.
- 6) The Candidates concerned

  
DISTRICT OFFICER (M&F)  
ELEMENTARY & SECONDARY EDUCATION  
DISTRICT SHANGLA.



**GOVERNMENT OF PUNJAB PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Peshawar, dated the 24<sup>th</sup> July, 2014.

**NOTIFICATION**

**No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:** In pursuance of the provisions contained in sub rule (2) of rule 3 of the **Hyber 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)&LD/1-28/2009/Vol-II** dated, **09-04-2004**, **No. SO(G)PE) Notification No. SO(G)&S&L/1-69/06/Vol-1/DPE/LIB** dated, **13-11-2007**, and **Notification No. SO(G)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 25 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.  <b>Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial</b>

(i)

"B"  
-8-

<p>1A Director Physical Education (MPS-17)</p>	<p>At least second class Master's Degree in Physical Education from a recognized University.</p>	<p>22-25 years</p>	<p>recruitment; and (b) Fifty percent by initial recruitment.</p>
<p>(a) Fifty percent by promotion, on the basis of seniority cum fitness, from amongst Senior Physical Education Teachers (MPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3;</p> <p>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;</p> <p>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</p>			

-10-

Approved: \_\_\_\_\_  
Secretary

1 18 Secondary School Teacher (EPS 16)	<p>1. At least passed their Bachelor Degree from a recognized University or held level from the following groups with Part subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physical, Maths 'A' or 'B' or Statistics)</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 MA Education or equivalent qualifications from a recognized University.</p>	<p>1. Seventy five per cent by promotion on the basis of seniority from the detail mentioned in the following manner</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (EPS 16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualifications mentioned in column No. 1</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-certification from amongst Certified Teachers, with at least five years service as such and having qualifications mentioned in column No. 1</p> <p>(b) four per cent from amongst the Senior Drawing Masters (EPS 16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualifications mentioned in column No. 1</p>
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**Better Copy**

(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>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>	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>

- 11 -

			<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:</p> <p>(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:</p> <p>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:</p> <p>(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:</p>
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(4)

		<p>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:</p> <p>(c) 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:</p> <p>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:</p> <p>(d) 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:</p> <p>Provided that if no suitable candidate is available from amongst</p>
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(5)



Handwritten notes in the top section of the page, including the words "SST" and "Primary School Teachers".

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:

1. 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  
ELEMENTARY & SECONDARY EDUCATION

Ends : 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 (FAIA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PTE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRI 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 Education Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FAIA.
16. All Agency Account Officer in FAIA.
17. PS to Governor Khyber Pakhtunkhwa, Peshawar.
18. PS to Governor Khyber Pakhtunkhwa, Peshawar.
19. PS to Chief Minister 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 KHAJAN MOMAND)  
SECTION OFFICER (PRIMARY)

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GOVERNMENT OF THE KYRGYZ REPUBLIC  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

*Relevance since November 11, 2012*

As stipulated in the Regulations on the Organization and Functioning of the Department of Elementary and Secondary Education of the Kyrgyz Republic, 1989 and in accordance with the provisions contained in Article 7) of the Law of the Kyrgyz Republic on the Organization and Functioning of the Department of Elementary and Secondary Education of the Kyrgyz Republic, the Department hereby lays down the method of recruitment, and the selection of applicants for the positions specified in Column No. 2 of the Appendix.

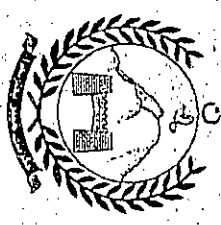
SECRETARY TO GOVERNMENT OF THE KYRGYZ REPUBLIC  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

*KPK*

1. The Secretary to Government of the Kyrgyz Republic, Education Department
2. The Secretary to Government of the Kyrgyz Republic, Finance Department
3. The Secretary to Government of the Kyrgyz Republic, Law Department
4. The Secretary to Government of the Kyrgyz Republic, Public Service Commission
5. The Director General of the Kyrgyz Republic, Education Department
6. The Director of the Kyrgyz Republic, Education Department
7. The Director of the Kyrgyz Republic, Education Department
8. The Director of the Kyrgyz Republic, Education Department
9. The Director of the Kyrgyz Republic, Education Department
10. The Director of the Kyrgyz Republic, Education Department

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT



NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Encls:- No. & Date as above.

Copy forwarded to:-

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

- 9. Director Curriculum & Teachers Education Alshelabod.
- 10. The Director ESRI, Elementary & Secondary Education Kyrgyz Pashunlikhwa, Peshayot.
- 11. The Deputy Director DeyshoyetEHSISE Department.
- 12. All District Coordination Officers in Kyrgyz Pashunlikhwa.
- 13. All Executive District Officers Elementary & Secondary Education in Kyrgyz Pashunlikhwa.
- 14. All District Accounts Officers in Kyrgyz Pashunlikhwa Agency Accounts Officers FATA.
- 15. All Agency Education Officers FATA.
- 16. P.S to Governor, Kyrgyz Pashunlikhwa.
- 17. P.S to Chief Inspector, Kyrgyz Pashunlikhwa.
- 18. P.S to Chief Secretary, Kyrgyz Pashunlikhwa.
- 19. P.S to Minister EHSSE Kyrgyz Pashunlikhwa Peshayot.
- 20. P.S to Secondary ESSE Department.
- 21. Master file.

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7. The Director Education (FATA) Khyber Pakhtunkhwa, Peshawar.
8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Dalabasse(EMIS) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers in FATA.
15. All Agency Education Officers. In FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.

Section Officer (Primary)

APPENDIX

No. of posts	Name of the post	Minimum qualification and experience for initial appointment or by transfer	Age limit	Method of recruitment
2	Secondary School Teacher (HS-10)	<p>(i) Secondary School Teacher's Degree with two subjects: Chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from recognized University.</p> <p>(ii) M.A. in Education or Bachelor's Degree in Education from a recognized University.</p>	18 to 35 years.	<p>(i) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:</p> <p>(ii) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualifications mentioned in column No. 3;</p> <p>(iii) four per cent from amongst the Operating Masters with at least five years service as such and having qualifications mentioned in column No. 3;</p> <p>(iv) one per cent from amongst the Physical Education Teachers at the discretion of the Government and having qualification mentioned in column No. 3.</p>

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APPENDIX

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



<p>Senior Arabic Teacher (S.A.T) (DPS-16)</p>			<p>(v) one per cent from amongst the instructional members of the school having five years service and having qualification mentioned in column No. 3 and</p> <p>(vi) one per cent from amongst Arabic Teachers with at least five years service as such and having qualification mentioned in Column No. 3 and</p> <p>(b) fifty per cent by initial recruitment.</p>
<p>Senior Theology Teacher (S.T.T) (DPS-16)</p>			<p>By promotion, on the basis of seniority and fitness, from amongst Arabic Teachers, with least five years' service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.</p> <p>By promotion, on the basis of seniority and fitness, from amongst Theology Teachers, at least five years' service as such and having qualification as prescribed for initial recruitment of Theology Teacher.</p>
<p>Senior Certified Teacher (S.C.T) (General) (DPS-16)</p>			<p>By promotion, on the basis of seniority and fitness, from amongst Certified Teacher (General), with at least five years' service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).</p>

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

6.	Senior Certified Teacher (Agriculture) (AP-S-14)	By promotion on the basis of seniority-qualification from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
7.A.	Senior Drawing Master (AP-S-16)	By promotion on the basis of seniority-qualification from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
5.	Senior Certified Teacher (SCT) (Home Economics) (AP-S-10)	By promotion on the basis of seniority-qualification from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
✓	Senior Certified Teacher (SCT) (Physical Education)	By promotion on the basis of seniority-qualification from amongst Certified Teachers (Physical Education), with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

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

11	Theology Teacher (T/T) (BPS-15)	20 to 35 years	Initial recruitment
<p>(i) Second Class Secondary School Certificate from a recognized Board with Shakhidat Alimul Islahiyatul Arabia wal Islamiah from recognized Tanzimatul Wara'iqul Madaris; or Darul Uloom Saitul Sharif Swat, Darul Uloom Gharabagh Swat, Darul Uloom Chitral, Darul Uloom Darooh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or</p> <p>(ii) Second Class Master's Degree in Arabic from a recognized University.</p>	<p>(i) Second Class Secondary School Certificate, from a recognized Board with Shakhidat Alimul Islahiyatul Arabia wal Islamiah Wara'iqul Madaris, or Darul Uloom Saitul Sharif Swat, Darul Uloom Gharabagh Swat, Darul Uloom Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or</p> <p>(ii) Second Class Master's Degree in Islamic Studies from a recognized University.</p>	<p>20 to 35 years.</p>	<p>(i) Seventy-five per cent by initial recruitment and</p> <p>(ii) twenty-five per cent by promotion, on the basis of seniority-cum-fitness. You amongst the Senior Grade, with at least five years service and having the qualification prescribed for recruitment of Theology Teacher.</p> <p>Note: In case of non-availability of suitable person for promotion, then by initial recruitment.</p>
<p>(iii) Certified Teacher (General) (BPS-15)</p>	<p>His/her's Degree or equivalent qualification from a recognized University with Certified Teacher</p>	<p>20 to 35 years</p>	<p>(i) Forty per cent by initial recruitment; and</p> <p>(ii) Sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst those with at least five years service and having the qualification prescribed for recruitment of Theology Teacher.</p>

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

<p>(1) Certified Teacher (Professional Act)</p>	<p>(ii) Bachelor's Degree from a recognized university with two years remaining in the field of education; or                  Government Instructant or Center or Vocational Instructant or Center or</p>	<p>18 to 35 years</p>	<p>(b) sixty per cent by promotion, on the basis of seniority-earnings; from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).                  Provided that if no suitable candidate is available amongst the Primary School Head Teachers to transfer, then the posts will be filled by promotion on the basis of seniority-earnings, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p>
	<p>(ii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years</p>	<p>(b) sixty per cent by promotion, on the basis of seniority-earnings; from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).                  Provided that if no suitable candidate is available amongst the Primary School Head Teachers to transfer, then the posts will be filled by promotion on the basis of seniority-earnings, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p>
	<p>(ii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years</p>	<p>(b) sixty per cent by promotion, on the basis of seniority-earnings; from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).                  Provided that if no suitable candidate is available amongst the Primary School Head Teachers to transfer, then the posts will be filled by promotion on the basis of seniority-earnings, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p>
	<p>(ii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years</p>	<p>(b) sixty per cent by promotion, on the basis of seniority-earnings; from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).                  Provided that if no suitable candidate is available amongst the Primary School Head Teachers to transfer, then the posts will be filled by promotion on the basis of seniority-earnings, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p>

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14.	Certified Teacher (Industrial Arts) (BPS-15)	(b)	Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or	18 to 35 years.	<p data-bbox="1074 971 1160 1457">Certificate of two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.</p> <p data-bbox="980 1582 1160 2055">(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).            Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p data-bbox="611 1582 697 2055"><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p> <p data-bbox="399 1582 603 2055">(a) Forty per cent by initial recruitment; and            (b) - sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>
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<p>15. Certified Teacher (Agriculture) (BPS-15)</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government Institute or center with nine months training from Government Aeronautical College (Government Aeronautical College) or Federal Aeronautical (Agriculture) or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University, or</p> <p>(iii) Bachelor's Degree from an recognized</p>	<p>15 to 35 years</p>	<p>University with nine months training from any Government Aeronautical College or Training Center of the Level of Certified Teacher, Aeronautical (Theoretical Arts).</p> <p align="center">(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers &amp; Promotion, then the posts will be filled by promotion on the basis of seniority cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p> <p>(a) Forty per cent by initial recruitment and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p>[Provided that if no suitable candidate is available amongst the</p>
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<p>15. Certified Teacher (Agriculture) (BPS-15)</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from</p>	<p>18 to 35 years.</p>	<p>(Industrial Arts)</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p> <p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture);</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for</p>
	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the level of Certified Teacher, Agro technical (Industrial Arts).</p>		

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

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

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

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

<p>19. Primary School Head Teacher (PSHT) (BPS-15)</p>	<p>Physical Education Teacher (BPS-15)</p>	<p>18 to 35 years</p>	<p>(a) Eighty per cent by initial recruitment; or (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p>
<p>20. Senior Primary School Teacher (BPS-19)</p>			<p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p>
			<p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>

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



				<p>with at least five years service as such having qualification prescribed for initial recruitment of Primary School Teacher.</p>
21	<p>Primary School Teacher (U.P.S.) (2)</p>	<p>(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate, Diploma in Education from a recognized Institute; or          (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.</p>	<p>18 to 35 years.</p>	<p>By initial recruitment on merit at Union Court level; provided that if no suitable candidate within the Union Council is available, then from the adjacent Union Councils on merit.</p>
22	<p>Dean (RPS) (2)</p>	<p>Intermediate with Hitz-e-Quran and Qari Saaid from a recognized Institution.</p>	<p>18 to 35 years.</p>	<p>By initial recruitment.</p>

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12

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

SCHEDULE

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

Applicable Teacher Educational Qualification	Total Marks: 100
SSC	Marks obtained / A 20 / total marks =
HS/C	Marks obtained / A 20 / total marks =
B.A/B.Sc.	Marks obtained / A 20 / total marks =
B.A/B.Sc. / Student's Assistant / B.A. / B.Sc. / total marks =	Marks obtained / A 20 / total marks =
Education from a recognised Institution and / B.A. / B.Sc. / total marks =	Marks obtained / A 20 / total marks =
Applicable	Marks = 05

Primary Teacher

Category of Qualification	Total Marks: 100
SSC	Marks obtained / A 20 / total marks =
PNSC	Marks obtained / A 20 / total marks =
B.A/B.Sc.	Marks obtained / A 20 / total marks =
B.A/B.Sc./B.A. Edu	Marks obtained / A 20 / total marks =
B.A/B.Sc./B.A. Edu / B.A. / B.Sc. / total marks =	Marks obtained / A 20 / total marks =
B.A/B.Sc./B.A. Edu / B.A. / B.Sc. / total marks =	Marks = 05

B. H. S. 15/15

SCHEDULE

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

ARABIC TEACHER

Category of Qualification	Total Marks 100
SSC	Marks Obtained * 20/ Total Marks
HSSC	Marks Obtained * 20/ Total Marks
BA/B.Sc	Marks Obtained * 20/ Total Marks
M.A Arabic/ Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimul Wafaqul Madaris	Marks Obtained * 20/ Total Marks
Other MA/M.Sc/M.Ed/MA Edu	Marks Obtained * 15/ Total Marks
M. Phil/PhD	Marks = 05

THEOLOGY TEACHER

Category of Qualification	Total Marks 100
SSC	Marks Obtained * 20/ Total Marks
HSSC	Marks Obtained * 20/ Total Marks
BA/B.Sc	Marks Obtained * 20/ Total Marks
M.A Islamiyat / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimul Wafaqul Madaris	Marks Obtained * 20/ Total Marks
Other MA/M.Sc/M.Ed/MA Edu	Marks Obtained * 15/ Total Marks
M. Phil/PhD	Marks = 05

Unit Four

Category of Qualification	Total Marks 199
NSC	Marks obtained 120 out of 120
Open School from a recognized Institution	Marks obtained 120 and total =
MARKS	Marks obtained 120 out of 120
MARKS	Marks obtained 120 out of 120
MARKS IN ENGLISH	Marks obtained 120 out of 120
MARKS IN	Marks - 05

Graded Factor  
General Industrial Arts (Secondary Home Economics)

Category of Qualification	Total Marks 199 For Humanities group B	Contribution to Average group
NSC	Marks obtained 120 out of 120	<p>5 marks each for NSC 5 Examinations for the NSC final 1 term marks for NSC will be added into the total marks obtained by a candidate during the 4 Exams</p>
NSC	Marks obtained 120 out of 120	
MARKS	Marks obtained 120 out of 120	
MARKS	Marks obtained 120 out of 120	
MARKS IN ENGLISH	Marks obtained 120 out of 120	
MARKS IN	Marks = 05	

QARI/QARIA

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Category of Qualification	Total Marks 100
SSC	Marks Obtained * 20/ Total Marks
Qari Sanaed from a recognized Institution	Marks Obtained * 20/ Total Marks
HSSC	Marks Obtained * 20/ Total Marks
BA/B.Sc	Marks Obtained * 20/ Total Marks
M.A/M.Sc/M.Ed	Marks Obtained * 15/ Total Marks
M. Phil/PhD	Marks = 05

PCERTIFIED TEACHER

Category of Qualification	Total Marks 100	For Candidates of Science Group
HSSC	Marks Obtained * 20/ Total Marks	5 Marks marks for English and 15 marks for MS will be added to the total score obtained by a candidate during his selection.
BA/B.Sc	Marks Obtained * 20/ Total Marks	
CT Certified Diploma in Education/ADE	Marks Obtained * 20/ Total Marks	
Other MA/M.Sc/M.Ed/MA Edu	Marks Obtained * 15/ Total Marks	
M. Phil/PhD	Marks = 05	

J. J. K. UCC A.T. Corp

*Primary Master*

Category of Qualification	Total Marks 100	Per Candidate of Nucleus group
NSC	Marks obtained X 30 / total marks =	3 Exam marks for NSC, 3 Exam marks for R.Sc and 4 Exam marks for M.Sc will be added to the total score reported by a candidate during his selection
HNSC	Marks obtained X 20 / total marks =	
B.Ed NSC	Marks obtained X 30 / total marks =	
D.Ed Certificate	Marks obtained X 20 / total marks =	
M.A. / M.Sc / M.Ed / M.A. / M.Ed	Marks obtained X 15 / total marks =	
Other Post	Marks = 00	

*Primary Education Teacher*

Category of Qualification	Total Marks 100	Per Candidate of Nucleus group
NSC	Marks obtained X 20 / total marks =	3 Exam marks for NSC, 3 Exam marks for R.Sc and 4 Exam marks for M.Sc will be added to the total score reported by a candidate during his selection
HNSC	Marks obtained X 30 / total marks =	
B.Ed NSC	Marks obtained X 30 / total marks =	
IDPE or Equivalent Certificate	Marks obtained X 20 / total marks =	
M.A. / M.Sc / M.Ed / M.A. / M.Ed	Marks obtained X 15 / total marks =	
Other Post	Marks = 00	

SCHEDULE

Bolaji Gbolaji

**DRAWING MASTER**

Category of Qualification	Total Marks 100	For Candidate of Science Group
SSC	Marks Obtained * 20/ Total Marks	5 Extra marks for F.Sc 5 Extra Marks for B.Sc and
HSSC	Marks Obtained * 20/ Total Marks	5 Extra Marks for MS will be added to the total
BA/B.Sc	Marks Obtained * 20/ Total Marks	score obtained by a candidate during his
DM Certificate	Marks Obtained * 20/ Total Marks	selection.
Other MA/M.Sc/M.Ed/MA Edu	Marks Obtained * 15/ Total Marks	
M. Phil/PhD	Marks = 05	

**PHYSICAL EDUCATION TEACHER**

Category of Qualification	Total Marks 100	For Candidate of Science Group
SSC	Marks Obtained * 20/ Total Marks	5 Extra marks for F.Sc 5 Extra Marks for B.Sc and 5 Extra
HSSC	Marks Obtained * 20/ Total Marks	Marks for MS will be added to the total score obtained by
BA/B.Sc	Marks Obtained * 20/ Total Marks	a candidate during his selection.
IDPE or Equivalent Certificate	Marks Obtained * 20/ Total Marks	
Other MA/M.Sc/M.Ed/MA Edu	Marks Obtained * 15/ Total Marks	
M. Phil/PhD	Marks = 05	



Element School Teacher

Category of Qualification	Total marks (100) For Humanities group in Intermediate level	For Candidates of Science
SNC	Marks obtained X 20 / total marks X 100	Total marks for SNC 50
SNC	Marks obtained X 10 / total marks X 100	From marks for SNC with 100% obtained in 40 marks
EDUCATION	Marks obtained X 25 / total marks X 100	
EDUCATION	Marks obtained X 20 / total marks X 100	
MASSICAL (ED) MA PSH	Marks obtained X 30 / total marks X 100	
APPROVAL	Marks - 05	

Other conditions:-

- The concerned appointing authority will scrutinize and verify the documents and make the appointment as per prescribed rules.
  - The merit list prepared by the concerned appointing authority shall be displayed for ten days in the office of the appointing authority. In case of discrepancy, the concerned authority shall be notified to rectify the same within the prescribed time.
  - In case of discrepancy, the concerned authority shall be notified to rectify the same within the prescribed time.
- For and on behalf of the Government of Punjab, Peshawar
- Chief Secy, EDU (EPT) PESHAWAR

*(Handwritten signature)*

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PRIMERY SCHOOL TEACHER

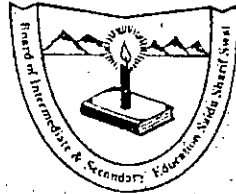
Category of Qualification	Total Marks 100	For Candidate of Science Group
SSC	Marks Obtained * 20/ Total Marks	5 Extra marks for F.Sc 5 Extra Marks for MSc will be added to the total score obtained by a candidate during his selection.
HSSC	Marks Obtained * 20/ Total Marks	
BA/B.Sc	Marks Obtained * 20/ Total Marks	
PST Certified Diploma in Education/ADE	Marks Obtained * 20/ Total Marks	
Other MA/M.Sc/M.Ed/MA Edu	Marks Obtained * 15/ Total Marks	
M. Phil/PhD	Marks = 05	

Other Conditions:-

SW No.(S/A) 17761

Roll No. 6185

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



'E'  
-35-

Saidu Sharif Swat N.W.F.P. Pakistan  
Secondary School Certificate Examination

SESSION ANNUAL 1992

THIS IS TO CERTIFY THAT FAZAL MAWJOOD

Sen/Daughter of MOHAMMAD ISMAIL

and a student of DIST: SWAT.

has passed the Secondary School Certificate Examination  
of the Board of Intermediate and Secondary Education, Saidu Sharif Swat held in  
1992 as a Regular/Private candidate. He/She obtained 579 Marks out of 850 and has  
been placed in Grade B Representing VERY GOOD.

The Candidate passed in the following subjects.

- |            |                     |           |                    |
|------------|---------------------|-----------|--------------------|
| 1. English | 3. Islamiyat        | 5. MATHS  | 7. GEN. SCIENCE    |
| 2. Urdu    | 4. Pakistan Studies | 6. PASHTO | 8. ISLAMIC STUDIES |

(He/She has been awarded Grade \_\_\_\_\_ on the basis of Internal  
assessment by the Institution concerned.)

Date of birth according to admission form is ELEVENTH MAY

one thousand nine hundred and SEVENTY SEVEN. (11-05-1977)

Asst. Secretary

This certificate is issued without alteration or erasure.

Secretary

swa No. (A) 0785



Roll No. 22747

# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION 36-



Saidu Sharif Swat N.W.F.P. Pakistan  
Intermediate Examination

HUMANITIES Group

SESSION ANNUAL 1997

THIS IS TO CERTIFY THAT

Son/Daughter of

and a Student of

Registered No. 146579

has passed the Intermediate Examination of the Board of Intermediate and

Secondary Education Saidu Sharif Swat held in

May 1997 as a Private/Regular candidate. He/She

obtained 53 Marks out of 100 and has been placed

in Grade N Representing FAIRMEDICAL

The Examination was taken as a whole/in parts

Asst. Secretary

This certificate is issued without alteration or erasure.

Secretary



# University of Peshawar

(Pakistan)

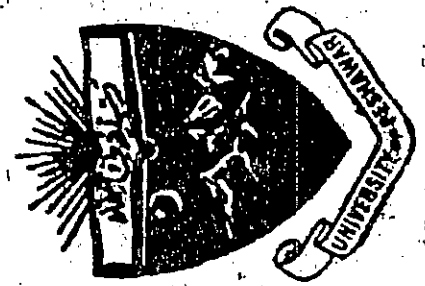
Session ANNUAL, 2000

FAZAL MAJOOD SON OF MUHAMMAD ISMAIL and a student

of DISTRICT SHANGLA having passed the prescribed examination held in JULY, 2000 is this day admitted by the University of Peshawar to the Degree of Bachelor of Arts in the SECOND Division

37-

The examination was taken as a whole / in parts.



Serial No. 062520

Registration No. 98-PS-28343

Roll No. 95182

Result declared on 7TH FEBRUARY, 2001

M. Javid  
Registrar

Countersigned

Z. Iqbal  
Vice-Chancellor

بسم الله الرحمن الرحيم

# University of Peshawar (Pakistan)

Session ANNUAL 2003

FAZAL MAWJOOD

SON of

MOHAMMAD ISMAIL

and a student/private candidate of DISTRICT SWAT  
having passed the prescribed examination held in SEPTEMBER, 2003  
is this day admitted by the University of Peshawar to the Degree of

## Master of Arts

In

PASHTO

In

SECOND Division

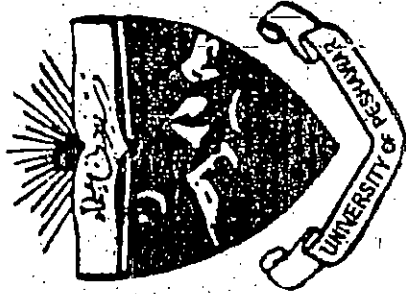
The Examination was taken as a whole / in parts

Serial No. 050699

Registered No. 96-PS-28940

Roll No. 25170

Result Declared on 28TH JAN, 2004



*[Signature]*  
Registrar

Countersigned

*[Signature]*

Vice-Chancellor

38-

-39-

# Allama Iqbal Open University Islamabad



Serial No. 83038

Certified that Mr. / Ms. FAZAL MAWJOOD

Son / Daughter of MUHAMMAD ISMAIL

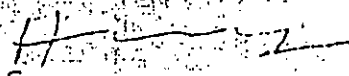
Registration No. 99-NSA-0016 Roll No. L-646832

having completed the prescribed requirements in semester  
SPRING 2003

is awarded the degree of:

## Bachelor of Education (B.Ed)

He / She has secured 61 % marks and has been placed in B grade.

  
CONTROLLER OF EXAMINATIONS

Result declared on: February 17, 2004

ISLAMABAD. DATED: May 10, 2006



  
VICE-CHANCELLOR

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



# Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY PESHAWAR

-40-

Serial Number SUTT-08-PRO-1656

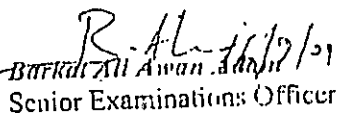
Date issued: August 13, 2008

## Provisional Certificate

This is to certify that Mr./Ms. Fazal Mawjood  
son / daughter of Mr. Mohammad Ismail  
registration number SUTT-06-01-70158  
is a regular student of the Sarhad University of Science and Information Technology,  
Peshawar in the session 2007-2008

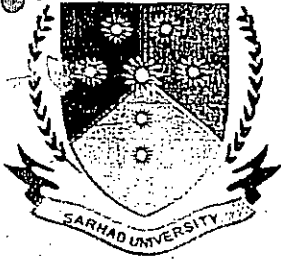
Mr./Ms. Fazal Mawjood has according to the result notification,  
issued by the University, passed the Junior Diploma in Physical Education - JDPE  
Examination Annual/Supplementary held in Nov - Dec 2007 and secured 1<sup>st</sup>  
division, obtained 712 marks out of 1050. He/she has already been issued a  
DMC by the Controller of Examinations. He/she will receive his/her diploma after due  
course of time on the request of student.

Mr./Ms. Fazal Mawjood bears good moral character and his/her  
conduct during his/her stay at the University from January 2007 to February 2008  
has been Very Good.

  
Barkat Ali Awan  
Senior Examinations Officer

# 36-B, Chinar Road, University Town, Peshawar-Pakistan  
Tel : +92-91-5846508-9; 5846516-8, Fax : +92-91-5841460





# Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

-41-

Serial Number SUIT-2016-PRO-6989

Date issued: 08 Aug, 2016

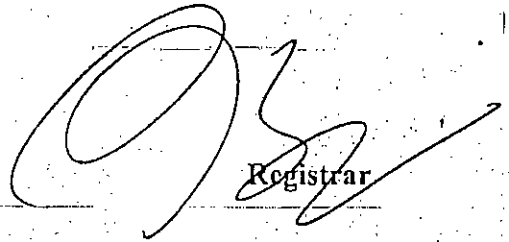
## Provisional Certificate

This is to certify that Mr./Ms. Fazal Mawjood  
son / daughter of Mr. Mohammad Ismail  
registration number SUIT-14-02-059-0126

is a regular student of the Sarhad University of Science and Information Technology,  
Peshawar in the session 2014 - 2016

Mr./Ms. Fazal Mawjood has according to the result notification,  
issued by the University, passed the Master of Health & Physical Education - MSc.(HPE) - 2 Year  
Examination Annual/Supplementary held in 05 Feb - 05 Mar, 2016 and secured 1st  
division, obtained 1213 marks out of 1850. He/she has already been issued  
a DMC by the Controller of Examinations. He/she will receive his/her degree in  
relevant convocation (if desired).

Mr./Ms. Fazal Mawjood bears good moral character and his/her  
conduct during his/her stay at the University from 03 Mar, 2014 to 05 May, 2016  
has been Very Good

  
Registrar

"F" - 42 -

To,

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

Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION DATED 24/7/2014 WHEREBY THE PROMOTION QUOTA OF THE APPELLANT CADRE i.e. PET TO THE POST OF SST(BPS-16) HAS BEEN DONE AWAY IN AN ILLEGAL MANNER AND IN VIOLATION OF SECTION-9 OF THE CIVIL SERVANTS ACT 1973 READ WITH RULE-7 OF THE APPOINTMENT, PROMOTION & TRANSFER RULES, 1989

Respected Sir,

The following facts are submitted for perusal and sympathetic consideration:-

That the appellant was initially appointed against the post of PTC BPS-07 and promoted to the post of Physical Education Teacher (PET) BPS-15 vide order dated 31/10/2011. That other colleagues of the appellant belonging to other cadres have been promoted to the post of SST (BPS-16) due to promotion quota while the appellant was ignored, having no prospects of promotion given by the department in the impugned rules dated 24/7/2014.

That previously as per Notification dated 13-12-2012 there was 4% quota reserved for PET cadre in the promotion of SST (BPS-16) with at least five years service as such and having qualification in column 3 of appendix to the service rules i.e. 2<sup>nd</sup> class Bachelor Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics, Humanities and other equivalent groups from a recognized University; OR MA in Education or Bachelor's Degree in Education from a recognized university. That the appellant fulfills the above mentioned criteria and thus deserves to be promoted to the post of SST (BPS-16) under the old rules but to the ibid impugned Notification the promotion quota has been done away in violation of Section 9 of the Civil Servant Act, 1973 read with rule 7 of the APT rules, 1989.

Forgoing in view, it is humbly requested that on acceptance of this departmental appeal the impugned notification dated 24/7/2014 may kindly be modified/rectified to the extent of allocation of quota for the cadre of the appellant i.e. PET cadre may kindly be restored and the appellant may kindly be consider for promotion to the post of SST (BPS-16) with all back benefits.

Yours obediently,

  
Fazal Mawjood PET (BPS-15),  
Education Department.

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RGLB1852088

No. 506

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-44-

**VAKALATNAMA**  
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

APPEAL NO: \_\_\_\_\_ OF 20\_\_

Fazal Manzoor

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt

(RESPONDENT)  
(DEFENDANT)


I/We \_\_\_\_\_ (Appellant)

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2022

  
**CLIENT**

**ACCEPTED**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**  
(BC-10-0853)  
(15401-0705985-5)

  
**UMAR FAROOQ MOHMAND**

  
**WALEED ADNAN**

  
**MUHAMMAD AYUB**  
**ADVOCATES**

**OFFICE:**

Flat No. (TF) 291\*-292 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)