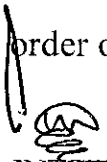


FORM OF ORDER SHEET

Court of _____

Case No.- _____

1757/2022


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. Tariq Hussain 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. Tariq Hussain PET GHHS Patrak District Dir Upper received today i.e. on 16.11.2022 is incomplete on the following score which is returned to the counsel for the appellatant 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- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal

No. 3224 /S.T,

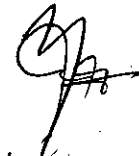
Dt. 17/11 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv. Pesh.

R/siv,

Resubmission need ful be done


2/10/22

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL No. 1757 /2022

TARIQ HUSSAIN

VS

EDUCATION DEPTT:

I N D E X

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with Affidavit	1-3
2.	Appointment order	A	4-5
3.	Copy of the impugned rules and promotion notification dated 08.12.2020	B & C	6-16
4.	Copies of the old rules dated 13.11.2012	D	17-32
5.	Copy of the Educational Testimonials	E	33-36
6.	Copies of the Departmental Appeal and Registry Receipt	F	37-38
7.	Vakalatnama		39


APPELLANT

Through:


NOOR MOHAMMAD KHATTAK
ADVOCATE
SUPREME COURT OF PAKISTAN

-1-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 1757/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1959

Dated 16-11-2022

Mr. Tariq Hussain, PET (BPS-15),
GHHS Patrak, District Dir Upper.

..... **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.

Filed to-day
16/11/22

R/SHWETH:

ON FACTS:

1. That the appellant was appointed against the post of PET BPS-15 vide order dated 28.03.2017 and has been performing his duties with devotion and up to the entire satisfaction of his superiors. Copy of the initial appointment order dated 28.03.2017 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 mala fide and as such the respondents violated the principle of natural justice.

-3-

- 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

TARIQ HUSSAIN

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT


WALEED ADNAN


UMAR FAROOQ MOMAND


MUHAMMAD AYUB


&
KHANZAD GUL
ADVOCATES

AFFIDAVIT

I, Tariq Hussain, PET (BPS-15), GHHS Patrak, District Dir Upper, 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



4A
-4-

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Dir Upper (Phone # 0911-881400)**

APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered purely on merit against the vacant posts of Physical Education Teacher on Adhoc School basis policy in DPS: 15 (Rs.13510/-) Fixed plus usual allowances as admissible to them under the Rules and existing policy of the Provincial Government on the terms & conditions given below with effect from the date of their taking over charge in the interest of public service.

S.N	Name of candidate	Father's Name	Name of school	D/O Birth	Score	Remarks
1	TARIQ HUSSAIN	SHAH WAZIR KHAN	GHS Patrak	14/08/1989	112.93	A.V.Post
2	AYAZ UD DIN	SULTAN KHAN	GMS Gamdat	01/01/1991	107.59	A.V.Post
3	UAQAT AHMAD	KHALIL AHMAD	GMS Jarjuray	01/01/1984	102.13	A.V.Post
4	SYED ISLAMM ULLAH	SYED FATAH JAN	GMS Nasrat	18/02/1979	101.41	A.V.Post
5	MUSHITAQ	UMAR ZAMIN	GMS Hayagal Cha	01/08/1990	99.88	A.V.Post
6	AHMAD ALI	MUHAMMAD ABDUL WAHAB	GMS Kibool	07/05/1993	98.93	A.V.Post
7	KIRAMAT SHAH	FAZAL RAHIM SHAH	GHS Thall	09/03/1983	98.77	A.V.Post

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year period with effect from 28.03.2017 to 27.03.2018.
4. They should not be handed over charge if their age exceeds 35 (Thirty Five) or below 18 years of age.
5. Appointment is subject to the condition that their certificates/documents must be verified from the concerned authorities, and anyone found producing bogus certificate/s or degree/s their appointment shall be cancelled and they will be reported to the Law enforcing agencies for further legal action.
6. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government treasury.
7. Pay shall not be drawn until and unless a certificate issued by this office that to the effect that their documents have been verified.
8. They should join their posts within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification their appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. They will be governed by such Rules and Regulations as may be issued from time to time by the Government.
11. Their services shall be terminated at any time in case their performance is found unsatisfactory during their service period. In case of misconduct, they shall be proceeded against under the relevant rules & regulations announced from time to time.
12. Their appointment is Ad hoc and school based. They shall have to serve at their place of posting and their services are not transferable to any other station.

-5-

13. Before handing over charge to them, their documents may be checked and if found bogus or fake they may be reported to this office for necessary action.
14. Posting with in the selected five schools is the wholly solely authority of the appointing authority and no one has the right to claim for a specific school.
15. All the Principal / Headmasters are required to collect an affidavit from each candidate that he will follow all the terms and condition listed above and will keep it on record.
16. Errors and omissions will be acceptable within the specified period.

(DR. HAFIZ MUHAMMAD IBRAHIM)
DISTRICT EDUCATION OFFICER
MALE DIR UPPER

Endst No: 1666-73 PET/Appointment/Ad hoc/NTS dated: 28/03/2017

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

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Dir Upper.
3. Principal/Headmaster concerned.
4. Deputy DEO Male Local Office.
5. The B&AO Local Office
6. The Supdt Secondary Local Office.
7. The candidates concerned.
8. Master File.


DISTRICT EDUCATION OFFICER
MALE DIR UPPER



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

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No. SO(PE)4-5/SSRC/Meeting/2014/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, No. SO(PE) Notification No. SO(G)S&LD/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No. SO(PE) Notification 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 MA 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 falling in their promotion quota shall be filled by initial

(ii)

<p align="center">1A Director Physical Education (BPS-22)</p>	<p align="center">At least second class Master's Degree in Physical Education from a recognized University.</p>	<p align="center">22-25 years</p>	<p align="center">recruitment; and (b) Fifty percent by initial recruitment.</p> <p align="center">(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:</p> <p align="center">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 align="center">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</p> <p align="center">(b) Fifty percent by initial recruitment; and</p>
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Department of Education, New York State, for the purpose of determining the minimum requirements for the various positions mentioned herein.

-8-

<p>1 10 Elementary School Teacher (K-5) and Teacher (6-8)</p>	<p>1 2 A) B.S. in Education with a recognized Degree from a recognized University or need have from the following groups with two subjects: (a) (Chemistry, History or Zoology), Or (b) (Physics, Math's "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject; and 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>3 11:30 P.M.</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000</p> <p>Secretary must pass exam by presentation, on the basis of university exam forms from the district concerned in the satisfactory manner</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (Reg-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 university exam forms 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 (Reg-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualifications mentioned in column No. 3</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), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (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>

			<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-fines, 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: 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-fines, 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)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION

Encls : 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 Education 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 ES&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary ES&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file.

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

(7)



**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

*Approved
2012*

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. So(B&A)/1-18/E&SE /2012, Dated 11.07.2012 and Finance Department Endorsement No. SO(FR)/FD/10-22(E) dated 16.07.2012, the following SCT/CT, SDM/DM, SAT/AT, STT/TT, S.Qari/Qari and PSHT/SPST/PST are hereby promoted to the posts of SST(G), SST(B/C) and SST(P/M) in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions as given below with immediate effects, and further they will be adjusted by the District Education Officer concerned:

A. Promotion to SST (G)

ITEM No.1: PROMOTION of SCT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
40% SCT/CT Promotion Quota Of SST (G)	8
Posts Available for Promotion to SST (G)	8
Proposed SCT for Promotion to SST(G)	7
Deferred of Promotion from SCT/CT to SST (G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular SCT	Qual:	Remarks
1	9	Ahmad Jan	Dheri Kot	02.02.1964	03.03.2013	MA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
2	20	Zahir Shah	GHS Wartair	01.03.1969	03.03.2013	BA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
3	21	Lutf Ullah	GHSS Kot	08.05.1970	03.03.2013	BA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
4	23	Muhammad Rashid	GHS Jolagram	06.02.1972	03.03.2013	BA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
5	25	Sajad Ahmad	GHSS Dheri Jolagram	04.02.1968	03.03.2013	MA M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
6	26	Arsala Khan	GHS No.1 Thana	16.04.1971	03.03.2013	MA M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
7	30	Rukhsar Muhammad	GCMHS Batkhela	04.03.1964	16.03.2013	MA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.2: PROMOTION of SDM (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
4% SDM/DM Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed SDM/DM for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular SDM	Qual:	Remarks
1	11	Sami Ullah	GHS Meherdi	14.02.1969	21.02.2013	MA DM B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

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ITEM No.3: PROMOTION of SAT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
4% SAT/AT Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed SAT/AT for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular SAT	Quali	Remarks
1	9	Abdur Rahim	GHS Nal	01.05.1968	21.02.2013	MA (Arb), M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.4: PROMOTION of STT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
4% STT/TT Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed STT/TT for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular STT	Quali	Remarks
1	10	Muhammad Nawaz	GHS Haryan Kot	10.04.1987	05.03.2019	BA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.5: PROMOTION of S.Qarl (BPS-15) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
3% S.Qarl/Qarl Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed S.Qarl/Qarl for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular S.Qarl	Quali	Remarks
1	2	Muhammad Naem	GHS No.2 Dargal	09.02.1976	09.02.2013	MA, M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.6: PROMOTION of PSHT (BPS-15) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
20% PSHT Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed PSHT for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular PST	Quali	Remarks
1	77	Syed Mujahid Shah	GPS Hero Shah	07.04.1963	26.05.1987	BA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
2	140	Altaf Ur Rahman	GPS Shengral	20.05.1970	15.02.1990	MA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
3	144	Liaqat Ali	GPS Kharkai	13.03.1964	14.03.1990	M.Sc, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
4	145	Aziz Ullah	GPS Arab banda	08.08.1964	14.03.1990	BA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

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Promotion to SST (B/C)

ITEM No.1: PROMOTION of SCT/CT MALE TO THE POST OF SST (B/C) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (B/C)	7
25% Share Initial Recruitment Of SST (B/C)	1.75
75% Promotion Quota Of SST (B/C)	5.25
40% SCT/CT Promotion Quota Of SST (B/C)	2.80
Posts Available for Promotion to SST (B/C)	3
Proposed SCT/CT for Promotion to SST(B/C)	1
Deferred of Promotion from SCT/CT to SST (B/C)	

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular CT	Qual:	Remarks
1	166	Muhammad Irshad	GMS Khushal Garh	12.03.1989	04.03.2015	B.Sc. B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(B/C) in BPS-16, on regular basis with immediate effect

C. Promotion to SST (P/M)

ITEM No.1: PROMOTION of SCT/CT MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (P/M)	8
25% Share Initial Recruitment Of SST (P/M)	2
75% Promotion Quota Of SST (P/M)	6
40% SCT/CT Promotion Quota Of SST (P/M)	3.2
Posts Available for Promotion to SST (P/M)	3
Proposed SCT/CT for Promotion to SST(P/M)	3

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular CT	Qual:	Remarks
1	157	Raham Qayum	GHS Pir Khel	06.04.1976	05.03.2019	B.Sc (P/M) B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect
2	44	Muhammad Rals Khan	GHS Totakan	03.12.1970	27.07.2015	B.Sc (P/M) B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect
3	165	Ajmal Khan	GHS Dheri Jalagram	05.03.1984	04.03.2015	B.Sc (P/M) B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect

ITEM No.2: PROMOTION of PSHT/SPST MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (P/M)	2
25% Share Initial Recruitment Of SST (P/M)	2
75% Promotion Quota Of SST (P/M)	6
20% PSHT/SPST Promotion Quota Of SST (P/M)	1.60
Posts Available for Promotion to SST (P/M)	2
Proposed PSHT/SPST for Promotion to SST(P/M)	2

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular PST	Qual:	Remarks
1	479	Rahman Gul	GPS Sharif Abad	15.09.1976	08.11.2004	B.Sc. B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect
2	480	Shams Ul Wahab	GPS Ghanigin Abad	10.03.1979	08.11.2004	B.Sc. B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect

Terms and Conditions:

- 1) They would be on probation for a period of one year extendable for another one year.
- 2) They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3) Their services can be terminated at any time, in case their performance is found unsatisfactory during the probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4) Charge report should be submitted to all concerned.
- 5) Their Inter-service-Seniority on lower post will remain intact.
- 6) No TA/DA is allowed for joining their duty.

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- 7) They will give an under-taking to be recorded in their Service-Books to the effect that if any over-payment is made to them in light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
- 8) Before handing over charge, their document may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Haliz Er, Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 2799-3004 File No. 1/Promotion SST (BPS-16) Dated Peshawar the 8/12/2020

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Malakand
3. District Accounts Officer Malakand
4. Officials Concerned
5. PS to the Secretary to the Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director, E&SE, Khyber Pakhtunkhwa Peshawar
7. M/File

Deputy Director (Estab.)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT



NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PEY4/S/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.

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9. Director Curriculum & Teachers Education Abbottabad.
10. The Director (P.T.E) Khyber Pakhtunkhwa Peshawar
11. The Deputy Director, Dalabaz (E.M.S) 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 FATA.
15. All Agency Education Officers 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. P.S to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. P.S to Secretary E&SE Department.
21. General File.

Section Officer (Primary)

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7. The Director Education (FATA) Khyber Pakhtunkhwa, Peshawar.
8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PTE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database (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

1. No. of posts	2. Nomenclature of the post	3. Minimum qualification and experience for initial appointment or by transfer	4. Age limit	5. Method of recruitment
1	Secondary School Teacher (BPS-16)	(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. (ii) M.A. in Education or Bachelor's Degree in Education from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-flores, 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.

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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.	Secondary School-Teacher (BPS-16).	(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.	18 to 35 years.	(a) Fifty per cent 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>(a) 50 per cent from amongst Instructional Material Specialists with atleast five years service and having qualification mentioned in column No. 3 and</p> <p>(v) one per cent from amongst Arabic Teachers who at least 10 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 Arabic Teacher (S.A.T.) (U.P.S. 16)</p>			<p>By promotion, on the basis of seniority-cum-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>Senior Theology Teacher (S.T.T.) (U.P. 16)</p>			<p>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.</p>
<p>Senior Certified Teacher (S.C.T. (General)) (U.P.S. 16)</p>			<p>By promotion on the basis of seniority-cum-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).

<p>Industrial Arts) (HPS-161)</p>			<p>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).</p>
<p>6. Senior Certified Teacher (Agriculture) (HPS-161)</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teacher (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).</p>
<p>7. Senior Drawing Master (HPS-161)</p>			<p>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.</p>
<p>8. Senior Certified Teacher (SC/T) (Home Economics) (HPS-16)</p>			<p>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).</p>
<p>✓ Senior Physical Education Teacher (HPS-16)</p>			<p>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.</p>

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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.

<p>11 Theology Teacher (T1) (BPS-15)</p>	<p>(ii) Second Class Secondary School Certificate, from a recognized Board with Shalhdatul Alimiah Fil Uloomul Arabia wal Islamiah from a recognized Tanzimatal Wa'iqou Madaris or Darul Uloom Saudi Sharif Swat, Darul Uloom Charbagh 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 Second Class Master's Degree in Arabic from a recognized University.</p>	<p>20 to 35 years.</p>	<p>By initial recruitment</p> <p>(a) Seventy-five per cent by initial recruitment; and</p> <p>(b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having the qualification prescribed for initial recruitment of Theology Teachers.</p> <p>Note: In case of non-availability of suitable person for promotion, then by initial recruitment.</p>
<p>12 Senior Qari (BPS-15)</p>	<p>(ii) Second Class Master's Degree in Islamiyat from a recognized University.</p>	<p>18 to 35 years</p>	<p>By promotion on the basis of seniority-cum-fitness, from amongst Qaris with at least five years service and having the qualification prescribed for initial recruitment.</p> <p>(a) Forty per cent by initial recruitment; and</p>
<p>13 Certified Teacher (Gen-III) (BPS-15)</p>	<p>Master's Degree or equivalent qualification from a recognized University with Certified Teacher</p>	<p>18 to 35 years</p>	<p>(a) Forty per cent by initial recruitment; and</p>

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10.	Arabic Teacher (AT) (BPS-15)	(i) Second Class Secondary School Certificate, from a recognized Board with Shabdahul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimathul Wafaqul Madaris; or Darul Uloom Saidu 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 Shahdathul Alamia, from a recognized Tanzimathul Wafaqul Madaris or Darul Uloom Saidu 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 Islamiyat 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 Qaris, 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 Qari (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, 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>14 Certified Teacher (Industrial Arts) (BPS 12)</p>	<p>(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</p>	<p>18 to 35 years</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 (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-cum-fitness, from amongst Senior Primary School Teachers with at least five year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p>
	<p>(b) Bachelor's Degree from a recognized</p>		<p>(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>
	<p>Certificate or two years Associate Degree in Education from a recognized University or eight months Diploma in Education</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 (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-cum-fitness, from amongst Senior Primary School Teachers with at least five year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p>

Note: In case of non-availability of suitable person for promotion, then by initial recruitment.

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	<p>Certificate of two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.</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 (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>14. Certified Teacher (Industrial Arts) (BPS-15).</p>	<p>(i) 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</p> <p>(b) 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 and having qualification prescribed for initial recruitment of Certified Teacher</p>

Note: In case of non availability of suitable person for promotion, then by initial recruitment.

	<p>University with three months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher Agro technical (Industrial Arts).</p>
<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 (ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University, or (iii) Bachelor's Degree from an recognized</p>

18 to 35 years.

(Industrial Arts):
 Provided that if no suitable candidate is available amongst the Primary School Head Teachers & 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).
 Note: In case of non availability of suitable person for promotion, then by initial recruitment.
 (a) Forty percent 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 (Agriculture).
 Provided that if no suitable candidate is available amongst the

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	<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>(Industrial Arts): 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): Provided that if no suitable candidate is available amongst the Primary School Head Teachers for</p>
<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>16. Certified Teacher (Home Economics), (BPS-151)</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 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>(ii) Bachelor's Degree from a recognized University with three months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or</p> <p>(iii) 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 a qualification prescribed for initial recruitment of O</p>
<p>any Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</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 a qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</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>

17	Drawing Master (BPS-13)	Bachelor's Degree from a recognized University with one year Drawing Master (D.M.) course Certificate.	18 to 35 Years	<p style="text-align: center;">Certified Teacher (Home Economics).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p> <p>(a) Eligible per cent by initial recruitment and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness. For amongs the Primary School Teachers with atleast five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p>Note: In case of non-availability of suitable candidate for promotion then by initial recruitment.</p>
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		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).		Certified Teacher (Home Economics). Note: In case of non availability of suitable person for promotion, then by initial recruitment.
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the <u>Primary School Head Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Drawing Master. Provided that if no suitable candidate is available for promotion then on the basis of <u>seniority-cum-fitness</u> , from <u>Senior Primary School Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Drawing Master. Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.

18. Physical Education Teacher (BPS-15)	Bachelor's Degree from a recognized University with the equivalent Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years	<p>(10) Eighty per cent by initial recruitment or twenty per cent by promotion; on a basis of seniority-cum-fitness; from amongst the Primary School Hc 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> <p>Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
19. Primary School Head Teacher (PSHT) (BPS-15)			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service or having qualification prescribed for initial recruitment of Primary School Teacher.</p>
20. Senior Primary School Teacher (BPS-10)			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers.</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.	(a) Eighty per cent by initial recruitment, and (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.
19.	Primary School Head Teacher (PSHT) (BPS-15)			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.
20.	Senior Primary School Teacher (BPS-14)			Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment. 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. By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

22	Jull (BPS-12)	Intermediate with Buz-e-Quran and Qari Saad from a recognized institution.	18 to 35 years	By initial recruitment
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 or Union Court level, provided that if no suitable candidate within the Union Council is available, then from the adjacent Union Councils on merit.

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			with at least five 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. Intermediate with Hiz-e-Quran and Qirat Sanad from a recognized Institution.	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 Hiz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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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

QARI/QARIA

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Category of Qualification	Total Marks 100
SSC	Marks Obtained * 20/ Total Marks
Dari Sanad 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

Category of Qualification	Total Marks 100	For Candidate of Science Group
HSSC	Marks Obtained * 20/ Total Marks	5 Extra Marks for E.Oc 5 Extra Marks for 9.Oc and 5 Extra 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	

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 19/12/2019

Drawing Master

Category of Qualification	Total Marks 199	For Candidate of Science group
SSC	Marks obtained X 30 / total marks = _____	3 Even marks for Art, 3 Even marks for H.S. and 3 Even marks for M.A. or 30 be added to the total score obtained by a candidate during his selection
HSNC	Marks obtained X 20 / total marks = _____	
H.S. 6th	Marks obtained X 29 / total marks = _____	
DM Certificate	Marks obtained X 39 / total marks = _____	
MAA/ISE/AL/ES/MAI/MAI/MAI	Marks obtained X 15 / total marks = _____	
SP/SP/SP/SP	Marks = 05	

Physical Education Teacher

Category of Qualification	Total Marks 199	For Candidate of Science group
SSC	Marks obtained X 30 / total marks = _____	3 Even marks for Art, 3 Even marks for H.S. and 3 Even marks for M.A. or 30 be added to the total score obtained by a candidate during his selection
HSNC	Marks obtained X 20 / total marks = _____	
H.S. 6th	Marks obtained X 29 / total marks = _____	
DM/DE or Equivalent Certificate	Marks obtained X 39 / total marks = _____	
MAA/ISE/AL/ES/MAI/MAI/MAI	Marks obtained X 15 / total marks = _____	
SP/SP/SP/SP	Marks = 05	

SCHEDULE

Box 283

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/M.A 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 Marks for MS 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	
JDPE 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
SN	Marks obtained X 30 / Total marks =	3 favor marks for SSC-12 Ex
SN	Marks obtained X 10 / Total marks =	favor marks for H.Sec will be
SN	Marks obtained X 25 / Total marks =	marks obtained by a candidate
SN (Certificate/Diploma in Educational AIDE)	Marks obtained X 10 / Total marks =	
MAJAN-AL-ED : MA Ed	Marks obtained X 30 / Total marks =	
MAJAN-AL-ED	Marks = 05	

مدرسة / مدرس / مدرس

Other conditions:

- The concerned appointing authority will scrutinize and verify the documents and make the appointment at the discretion of the appointing authority.
- The merit list prepared by the concerned appointing authority shall be displayed for ten days for the objection/representation.
- The merit list after making necessary corrections while processing the objections/representations/representations, followed by registration upon the date of submission of the final merit list for the purpose of advertisement.
- The date of final merit list will be provided from the date of advertisement to the date of registration of the candidates.
- The final merit list will be provided to the concerned appointing authority.
- The Government reserves the right to accept or reject the candidates as it may deem fit.

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PRIMARY 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:-

S. No. 13995

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

33-Roll No 39807



Board of Intermediate and Secondary Education
Malakand

N. W. F. P. Pakistan

Secondary School Certificate Examination

Session 2008 (Annual)

Enrol No: 1110840212637

Group Science

This is to certify that TARIQ HUSSAIN

Son of SHAH WAZIR KHAN

and is student of UNIVERSITY PUBLIC SCHOOL SHERINGAL

He has passed the Secondary School Certificate Examination of the Board
of Intermediate and Secondary Education Malakand held in April, 2008

as a Regular Candidate. He obtained 902 marks out of 900 and has been placed
in Grade B Representing Very good.

The candidate passed in the following subjects.

- | | | | |
|------------|--------------|---------------------|----------------------|
| 1. English | 2. Urdu | 3. Pakistan Studies | 4. Islamic Education |
| 5. Physics | 6. Chemistry | 7. Biology | 8. Mathematics |

Date of birth according to admission form is: Fourteenth August Nineteen Eighty-Nine (14 : 08 : 1989)

Issue Date: 09 SEP 2009

Asstt. Secretary

Secretary

THIS CERTIFICATE IS ISSUED WITHOUT ALTERATION OR ERASURE.

Roll No. 48352

Marks Improved



S.No. 01933

Board of Intermediate and Secondary Education Malakand, Khyber Pakhtunkhwa, Pakistan

INTERMEDIATE EXAMINATION

Session 2011 (Annual)
Pre-Engineering Group

This is to certify that TARIQ HUSSAIN appeared as
Son of SHAH WAZIR KHAN

Ex-Student of University Boys College Sheringal, District Dir (U)
has passed the Higher Secondary School Certificate Examination of the Board of
Intermediate and Secondary Education, Malakand held in April, 2011 as a
Private Candidate. He obtained 688 Marks out of 1100 and has been placed in
Grade B Representing Very good. The examination was taken as a whole.

AA - 34 -

[Signature]
SK, Issue Secretary

Issue Date: 14 DEC 2012

[Signature]
Secretary

Serial No. 000662

Shabeed Benazir Bhutto University - 35-
Dir Upper, Khyber Pakhtunkhwa, Pakistan, Sheringal



Having fulfilled all the requirements for the Degree of

BS (4-YEAR) Management Science

Tariq Hussain S/O Shah Wazir Khan

is admitted to the above Degree in Session 2010-2014

Roll No: 285

Registration No: SBBU/C/MS/H-10-2553

Final Examination Year: 2015

Result declared on: 7-7-2015



Controller of Examinations

Registrar

Vice Chancellor

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No. 382357 Roll No. BC625897
 Name TARIQ HUSSAN Registration No. 15GDR01669
 Final Semester SPR-2016
 Father's Name SHAH WAZIR KHAN
 Address VILL PATRAK P/O PATRAK

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Tehsil KALKOT
 District DIR (UPPER)

has successfully completed **PRIMARY TEACHING CERTIFICATE**

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 16	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	78
SPR- 16	0617	TEACHING OF URDU	100	61
SPR- 16	0618	TEACHING OF MATHEMATICS	100	86
SPR- 16	0619	TEACHING OF SCIENCES & PHYSICAL	100	73
SPR- 16	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	70
AUT- 15	0613	PRINCIPLES OF EDUCATION	100	65
AUT- 15	0614	EDUCATIONAL PSYCHOLOGY	100	67
AUT- 15	0615	SCHOOL ORGANIZATION	100	73
AUT- 15	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	70

Credit 5 Total Marks/Obtained 900 / 643
 Result Declared JANUARY 10, 2017 Percentage/Grade 71 / A
 Date of Issue JANUARY 20, 2017

[Signature]

Controller of Exams

Disclaimer:
 This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not use right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the original record of the university student.

To,

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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 Physical Education Teacher (PET) BPS-15 vide order dated 28.3.2017. 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. 2nd 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,

Tariq Hussain PET (BPS-15),
Education Department.

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No. 498

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VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 20__

Faris Hussain

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)


I/We _____

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 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)