

30.09.2022

Appellant present through counsel.

Riaz Khan Paindakhel, learned Assistant Advocate General for respondents present.

Request for adjournment was made on behalf of appellant in order to prepare the brief. Adjourned. To come up for arguments on 04.11.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

4th Nov. 2022

Lawyers are on strike today.

To come up for arguments on 15.12.2022 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.



(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman


15.12.2022

Due to general strike of the Bar, case is adjourned to 31.01.2023 before D.B. Office is directed to notify the next date on notice board as well as the website of the Tribunal.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

15.07.2022

Nemo for appellant.

Mr. Kabir Ullah Khattak, Additional Advocate General for the respondents present.

While recording the judgment a confusion arose whether the appellant was seeking ante-dated promotion or up-gradation, as the appellant and his counsel are not present before the Tribunal, therefore, notices be issued to them to clarify the situation. To come up on ~~12.09~~ 2022 before D.B.



(Fareeha Paul)
Member (E)




(Kalim Arshad Khan)
Chairman



12.09.2022

Appellant alongwith his counsel present.

 Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Before opening the case, learned AAG invited the attention of this Bench to the order sheet dated 07.09.2020 vide which case was fixed for arguments on the question of jurisdiction and the learned AAG had been directed to produce attested copies of writ petition and CPLA for perusal and appropriate orders. Learned AAG when confronted with the order sheet was unable to produce relevant record, therefore, he is warned to be careful in future and to submit the attested copies of writ petition and CPLA for perusal and proper disposal of the appeal in hand. To come up for arguments on 30.09.2022 before D.B.

(Fareeha Paul)
Member(E)



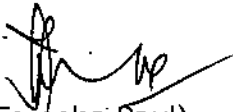
(Rozina Rehman)
Member(J)



10.5.2022

None present on behalf of the appellant.. Mr. Naseer-ud-din Shah, Assistant Advocate General for the respondents present.

This case pertains to the year 2015, it seems that none of the parties is interested in disposal of this case, therefore, case to come up for order before the D.B on 31.05.2022. Parties may argue the case before the announcement. Notice be issued to the parties in this regard.

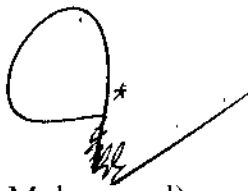

(Fareeha Paul)
Member (E)



Chairman

31th May, 2022

Counsel for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.

Arguments heard. To come up for order before the D.B on 22.06.2022.


(Mian Muhammad)
Member(E)



(Kalim Arshad Khan)
Chairman

22nd June, 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Because of the Departmental Selection Committee proceedings, we could not record the judgment. To come up on 21.07.2022 for order.


(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

27.07.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B on 01.11.2021.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

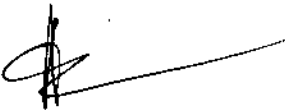

(SALAH-UD-DIN)
MEMBER (JUDICIAL)

01.11.2021

Junior to counsel for appellant present.

Muhammad Rasheed, learned Deputy District Attorney for respondents present.

The learned Member (Judicial) is on leave, therefore, case is adjourned. To come up for arguments on 03.12.2021 before D.B.


Chairman

3.12.21

procpis D.B and TALK, Therefore case is adjourned to 16.2.22 for D.B.

*Jaw
Reader*

16-2-22

due to Retirement of the Hon.ble Chairman the case is adjourned to come up for the same as before on 10-5-22

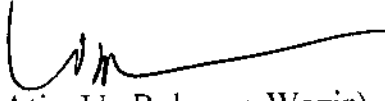
*Jaw
Reader*

01.12.2020

Appellant with counsel present.

Riaz Paindakhel learned Assistant Advocate General present.

Former requests for adjournment; granted. To come up for arguments on 10.02.2021 before D.B


(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

10.02.2021

Due to Pandemic of Covid-19, the case is adjourned to 08.04.2021 for the same.


Reader


8499 Due to demise of the learned Chairman, the Tribunal is defunct, therefore, case is adjourned to 27.7.21 for the same as before.

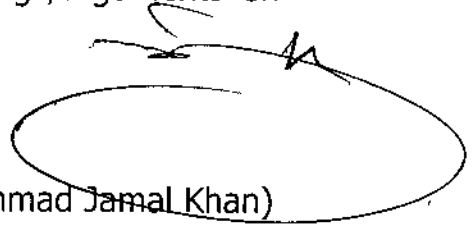

Reader.

14.10.2020

Muhammad Ghazanfar, Advocate for appellant present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Sajid ADO for respondents present.

Learned junior to senior requested for adjournment as learned senior counsel is engaged in the Hon'ble Peshawar High Court, Peshawar and cannot attend the Tribunal, however, he is directed to furnish the copies of Writ Petition and CPLA pending for adjudication in the august forum for perusal and appropriate order. Time was sought for its production too. He is directed to ensure compliance to the order within 03 days positively. File to come up for further proceedings/arguments on 01.12.2020 before D.B.


(Atiq-Ur-Rehman Wazir)
Member


(Muhammad Jamal Khan)
Member

14.10.2020

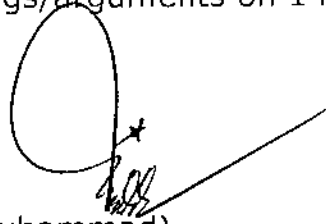
Atiq-Ur-Rehman Wazir
Muhammad Jamal Khan
Sajid ADO
Mr. Muhammad Jan
Learned Deputy District Attorney

Service Appeal No. 256/2015

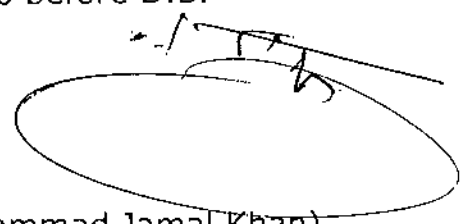
07.09.2020

Appellant is present in person alongwith Mr. Muhammad Amin Ayub, Advocate. Mr. Usman Ghani, District Attorney for the respondents is also present.

During the course of arguments learned District Attorney raised a preliminary objection on the question of jurisdiction that the issue pertains to up-gradation which is not a promotion, therefore, this Tribunal lacks jurisdiction in the instant appeal. He also submitted that so many appeals of the like nature have been returned and aggrieved persons have filed Writ Petition in the august High Court which is still pending adjudication. Furthermore, he submitted that some aggrieved persons moved CPLA in the august Supreme Court of Pakistan. In the circumstances, we deem it appropriate to direct both the appellant as well as District Attorney to submit the attested copies of Writ Petition and CPLA for perusal and appropriate order. To come up for further proceedings/arguments on 14.10.2020 before D.B.



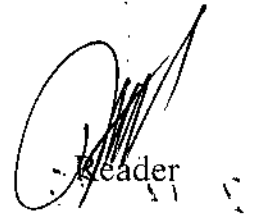
(Mian Muhammad)
Member (Executive)



(Muhammad Jamal Khan)
Member (Judicial)

30.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 18.06.2020 before D.B.


Reader

Handwritten notes in Hindi:
अदालत में दायर की गई
इस प्रकरण में 18.06.2020 को

18.06.2020

Due to Covid-19, the case is adjourned. To come up for the same on 07.09.2020 before D.B


Reader

7-10-2019

Due to four of Honble Member
to camp court Savat the case is
adjourned to 2-12-2019

2-12-19

The Bench is incomplete ^{Reader}

Therefore case is adjourned to

29-01-2020

^{Reader}
Reader

29.01.2020

Junior to counsel for the appellant and Mr. Ziaullah, DDA
for the respondents present.

Former requests for adjournment due to general strike
of the Bar. Adjourned to 30.03.2020 for arguments before
the D.B.


Member


Member

10.04.2019


Appellant in person present. Mr. Muhammad Jan, Deputy District Attorney for respondents present. Appellant seeks adjournment. Adjourned. Case to come up for arguments on 30.05.2019 before D.B.


(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

30.05.2019

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant A.G for respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel is not available today. Adjourned but as a last chance. Case to come up for arguments on 19.07.2019 before D.B.


Member


Member

19.07.2019

Appellant alongwith his counsel Mr. Ayub Amin, Advocate present. Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Sajid, ADO (Litigation) for the respondents present. The appellant has challenged the promotion notification dated 18.04.2014 but the minutes of meeting of Department Promotion Committee on the basis of which the promotion order of the appellant was issued is not available on the record. Representative of the department namely Sajid is strictly directed to furnish the said record as well as minutes of meeting of Department Promotion Committee dated 28.05.2013 on the next date positively. Adjourned to 07.10.2019 for record and arguments before D.B.


(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

Service Appeal No. 256/2015

02.11.2018

Neither appellant nor his counsel present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Due to retirement of Hon'ble Chairman, the Tribunal is incomplete. Therefore, the case is adjourned. To come up for the same on 26.12.2018.



Chairman

26.12.2018

Mr. Amin Khan, Advocate junior to Mr. Khalid Rahman, Advocate for appellant and Mr. Ziaullah, DDA for the respondents present.

On 30.07.2018 instant appeal was heard by a D.B comprising Hon'ble Members M/S Muhammad Hamid Mughal and Ahmad Hassan and the case was posted for order on 20.09.2018. Let the appeal be laid before the same Bench on 26.02.2019.



Chairman

26.02.2019

Nemo for appellant. Mr. Ziaullah, DDA for the respondents present.

To come up on 10.04.2019 before a Bench comprising of Honourable Members as noted in the previous order. The appellant/learned counsel shall be given notice for the next date.




Member




Chairman

08.03.2018

Junior to counsel for the appellant and Mr.Zia Ullah, learned DDA for the respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is ill. Adjourned. To come up for arguments on 14.05.2018 before D.B


(M.Amin Khan Kundi)
Member


(Muhammad Hamid Mughal)
Member


14.05.2018


Due to retirement of the worthy Chairman. the Tribunal is incomplete, therefore the case is adjourned. To come up for the same on 30.07.2018.


Reader

30.07.2018

Appellant with counsel and Mr. Ziaullah, Deputy District Attorney for the respondents present. Arguments heard. To come up for order on 20.09.2018.


(Ahmad Hassan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)

20.09.2018


Since 20 September 2018 has been declared as public holiday on account of Muharam Ul Haram. Therefore, the case is adjourned. To come up for the same on

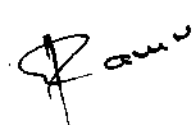
2.11.18


Reader

11. 06.07.2017


Appellant in person present. Mr. Zia Ullah, Deputy District Attorney for the respondent present. Appellant stated at the bar that senior counsel was busy before Peshawar High Court, Peshawar. Requested for adjournment. Adjourned. To come up for arguments on 01.11.2017 before D.B.



(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

01.11.2017


Clerk to counsel for the appellant and Addl:AG alongwith Mr. Sajid Khan, Litigation Officer for respondents present. Arguments could not be heard due to general strike of the Bar. To come up for arguments on 09.01.2018 before D.B.



Member
Executive


Member
Judicial

09.01.2018

Counsel for the appellant present and Mr. Muhammad Jan, alongwith Hamced ur Rahman, AD (Lit) for the respondents present. Counsel for the appellant submitted an application for amendment in the appeal. To come up for replication and arguments on the application as well as arguments on the main appeal on 08.03.2018 before D.B.


Member


Chairman

13.6.2016

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 14.11.2016.


Member


Member

14.11.2016

Counsel for the appellant and Mr. Hameedur Rahman, AD alongwith Assistant AG for the respondents present. Mr. Muhammad Aamir Nazir, learned Member (Judicial) is on leave therefore arguments could not be heard. To come up for final hearing on 07.3.2017 before D.B.


Chairman

07.03.2017

Counsel for the appellant and Mr. Usman Ghari, Sr.GP for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 06.07.2017 before D.B.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

31.07.2015

Appellant in person, M/S Khurshid Khan, SO and Javed Ahmed Supdt. alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 28.10.2015 before S.B.


Chairman

28.10.2015

Appellant in person, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) ~~and~~ Muhammad Haroon, Litigation Officer alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 24.02.2016 before S.B.


Chairman

24.02.2016

Agent of counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) and Javed Shah, Legal Advisor alongwith Addl: A.G for respondents present. Para-wise comments by respondents No. 1 and 2 submitted. The learned Addl: AG relies on the same on behalf of respondent No. 3. The appeal is assigned to D.B for rejoinder and final hearing for 13.6.2016.


Member

14.04.2015

Agent of counsel the appellant present. Requested for adjournment as counsel for the appellant is stated busy at Dar-ul-Qaza Swat. To come up for preliminary hearing on 28.4.2015 before S.B.


Chairman

28.04.2015

Agent of counsel for the appellant present. Counsel for the appellant is stated busy before Federal Shariat Court. Adjourned for preliminary hearing to 11.5.2015 before S.B.


Chairman

11.05.2015

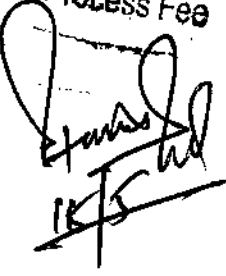
Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as TT in BPS-15 and his name was reflecting at S.No. 98 in the seniority list while the name of one Zawar Hussain reflecting in the seniority list at S.No.124 was promoted in preference to the appellant despite the fact that he was junior to appellant. That the appellant preferred service appeal No. 1487/2013 and that during the pendency of the same he was promoted as STT (BPS-16) on 18.04.2014 communicated to the appellant on 08.08.2014. That the appellant preferred departmental appeal on 11.11.2014 for effecting promotion from the date of his entitlement which was not responded and hence the instant service appeal on 31.03.2015.

That the appellant has withdrawn the earlier service appeal and is entitled to promotion w.e.f. 28.05.2013 the date on which junior to appellant Zawar Hussain was promoted.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 31.07.2015 before S.B.


Chairman



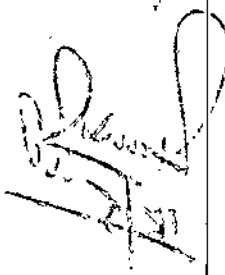
Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 256/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	31.03.2015	<p style="text-align: center;">The appeal of Mr. Hameed-ur-Rehman presented today by Mr. Khaled Rehman Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	3-4-15	<p style="text-align: center;">This case is entrusted to Bench <u>I</u> for preliminary hearing to be put up thereon <u>14-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: right;"> REGISTRAR</p>

SCANNED
KP SE
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 256 /2015

Hameed-ur-Rahman

.....Appellant

Versus

The Govt. of KPK & others

.....Respondents

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S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal			1-4
2.	Credentials		A	5-7
3.	Appointment order	26.03.1998	B	0-8
4.	Notification/Rules	13.11.2012	C	9-24
5.	Notification/Rules	24.04.2013	D	25-28
6.	Seniority List		E	29-36
7.	Notification of promotion	28.05.2013	F	37-38
8.	Service Appeal No.1487/2013		G	39-42
9.	Impugned Notification	18.04.2014	H	43
10.	Order of this Hon'ble Tribunal	26.03.2015	I	44-45
11.	Departmental Representation		J	46
12.	Letter of verification	18.12.2012	K	47
13.	Wakalat Nama			

Appellant

Through

Khaled Rahman
Advocate, Peshawar
3-D, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458
Cell # 0345-9337312

Dated: 31/3 /2015

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 256 /2015

Hameed-ur-Rahman,
Senior Theology Teacher,
GHS Ikram Pur, Mardan.....*Appellant*

**K.W.P. Province
Service Tribunal**

Diary No. 282

Date 31-3-2015

Versus

1. The Govt. of Khyber Pakhtunkhwa through
Secretary Elementary & Secondary Education,
Civil Secretariat, Peshawar.
2. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Dabgari Garden, Peshawar.
3. The District Education Officer (Male)
District Mardan.*Respondents*

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974
AGAINST THE IMPUGNED NOTIFICATION DATED
18.04.2014 COMMUNICATED ON 08.08.2014 WHEREBY
APPELLANT WAS THOUGH UPGRADED TO THE POST
OF STT (BPS-16) BUT WITH IMMEDIATE EFFECT
INSTEAD OF THE DUE DATE I.E. 28.05.2013 AGAINST
WHICH APPELLANT PREFERRED DEPARTMENTAL
REPRESENTATION TO THE APPELLATE AUTHORITY
ON 11.11.2014 BUT THE SAME WAS NOT DISPOSED OF
WITHIN THE STATUTORY PERIOD OF 90 DAYS.**

PRAYER:

On acceptance of the instant appeal, the impugned
Notification dated 18.04.2014 may graciously be
modified by effecting the upgradation of the appellant
w.e.f. the due date i.e. 28.05.2013 with all consequential
back benefits.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant has qualified B.A from Allama Iqbal Open University, Islamabad as well as obtained Shahadat-ul-Alia and Shahadat-ul-Alamia from Wifaq-ul-Madaris (Credentials *Annex:-A*). He joined the Education Department as T.T. vide order dated 26.03.1998 (*Annex:-B*) and at the moment has rendered about 17 years unblemished service.
2. That as per the Notification dated 13.11.2012 (*Annex:-C*) as amended vide Notification dated 24.04.2013 (*Annex:-D*), 1/3rd of the total strength of T.T. i.e. 67 shall be promoted to BPS-16 on the basis of seniority-cum-fitness with at least five years service and having the qualification for initial recruitment or having Bachelor's degree or equivalent qualification with Shahadat-ul-Alia from a recognized Institution to be designated as Senior Theology Teacher.
3. That as per the Seniority List (*Annex:-E*) appellant is at Serial No.98 while one Mr. Zawar Hussain was at Serial No.124 and thus junior to the appellant but inspite of the same vide Notification dated 28.05.2013 (*Annex:-F*) he was promoted to the next higher grade while appellant was not considered for promotion.
4. That being aggrieved of the order *ibid*, appellant after the departmental Representation, preferred Service Appeal No.1487/2013 (*Annex:-G*) before

this Hon'ble Tribunal but during the pendency of the appeal vide impugned Notification dated 18.04.2014 (*Annex:-H*) communicated on 08.08.2014 upgraded/promoted the appellant to the post of STT (BPS-16) but with immediate effect instead of the due date. The Service Appeal was then withdrawn with permission to file fresh one vide order dated 26.03.2015 (*Annex:-I*).

5. That being aggrieved of the impugned Notification *ibid*, appellant preferred a departmental Representation (*Annex:-J*) to the appellate authority on 11.11.2014 through proper channel but the same was not disposed of within the statutory period of 90 days, hence this appeal *inter-alia* on the following grounds:-

Grounds:

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification with immediate effect instead of the due date, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That appellant inspite of his seniority and eligibility for promotion was not promoted and instead a junior person was promoted at his instance which deprived the appellant from his due right of promotion in due time, which has resulted

in serious miscarriage of justice.

- C. That the Sanad Shahadat-ul-Alia was referred for verification by Respondent No.3 to the concerned quarter which was duly verified and communicated to him vide letter received on 18.12.2012 (*Annex:- K*) but even then appellant was not considered for promotion to the next higher grade on due date.
- D. That the non-promotion of the appellant in spite of his eligibility and seniority was due to the lapse on the part of the Department and not attributable to the appellant, therefore, appellant cannot be made to suffer on account of any omission on the part of the Department. It is a settled law that nobody can suffer for acts of the public functionaries.
- E. That appellant would like to offer some other grounds during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

Through


Appellant

Khaled Rahman,
Advocate, Peshawar

Dated: 31 / 3 / 2015

Ammer "A"

5

5

Ammer "A"



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وقائق المدارس العربية

باكستان

كشف الدرجات

امتحان الشهادة العالية في العلوم الإسلامية والعربية (ب) (ك)

عام ١٤١٦ هـ

٦٤٠

١٩٩٦

رقم التسجيل ١٠٩٤٣٣ رقم الجلوس ٦٤٠
 اسم الطالب محمد الرحمن اسم الوالد نور محمد
 المديرية كراتشي تاريخ الميلاد ١٤/١٢/١٩٥٥
 اسم الجامعة دار العلوم اسلامبولية كراتشي

المادة	الدرجات	المادة	الدرجات
التفسير	٦٤	اصول الفقه	٦٠
المدخل والعقود	٤٩	الفلسفة والعقائد	٥٠
الفقه	٦٤	الفقه العربية والفرس	٣٠
الدرجة الكلية ٤٠٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المحصلة ٢١٨			

تم بذور وقائق المدارس العربية أن الطالب المذكور أعلاه قد نجح في امتحان الشهادة العالية

بتقدير (ب) وحصل على ميدالية تقديرية ومجرباً

توقيع مراقب الامتحان



الكتب الرئيسية متان

تاريخ

١٤١٦ - ١٤١٥ هـ

ATTESTED

Attested to be True Copy

أجرك
لكم
له و
ثانوا
بان
له
ع
قا

بسم الله الرحمن الرحيم
 شهادة من دار العلوم والاسلامية العربية
 في شهر ربيع الثاني سنة 1405 هـ
 ان السيد محمد بن عبد الله بن محمد بن عبد الرحمن بن عبد الوهاب بن عبد المحسن بن عبد المطلب بن هاشم بن عبد مناف بن قصي بن كلاب بن مرة بن كعب بن لؤي بن غالب بن فهر بن مالك بن النضر بن كنانة بن خزيمة بن مدركة بن إلياس بن مضر بن نزار بن معد بن عدنان بن عبد الله بن عبد المطلب بن هاشم بن عبد مناف بن قصي بن كلاب بن مرة بن كعب بن لؤي بن غالب بن فهر بن مالك بن النضر بن كنانة بن خزيمة بن مدركة بن إلياس بن مضر بن نزار بن معد بن عدنان

المولود في عام 1365/1945 م. قد اتفقت الدراسة، السابقة في شعبان 1404/1983 م. بتقدير...
 وفاق المدارس العربية في شعبان 1404/1983 م. بتقدير...
 ورئيس الوفائق اذ يمنحها، هذه الشهادة بوصفها، بتقوى الله تعالى. ويسأل الله عز وجل ان يبارك به، وسبيل العلم والعلمانية.

شهادة من دار العلوم والاسلامية العربية
 في شهر ربيع الثاني سنة 1405 هـ
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وقفاً لدار العلوم والاسلامية العربية



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الشيخ
السيد

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Allama Iqbal Open University Islamabad



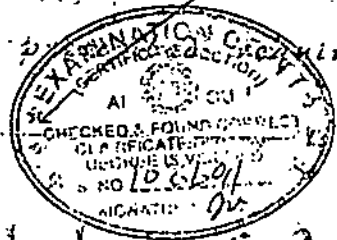
Serial No. — 108691

Certified that Mr. / Ms. HAMEEDUR RAHMAN

Son / Daughter of MUHAMMAD ZADA

Registration No: 06 NMN 3571 Roll No: W466965

having completed the requirements in semester
Spring 2008



awarded the degree of:

Bachelor of Arts
Group - General

attested

Signature

Stamp

*Entered in his
Co/Book on
11/10/09*

She has secured 52 % marks and has been placed in 13 grade.

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Signature
CONTROLLER OF EXAMINATIONS

Result declared on March 02, 2009

ISLAMABAD. DATED: October 13, 2009



Signature
VICE-CHANCELLOR

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

T.T., 873 Moti Benda

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Yours faithfully

Better Copy

Amrath "C"

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated 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 the 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 Appendix attached therewith.

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Sd/-

Encl: 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.
7. The Director Education (FATA), Peshawar.

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13/11/2012



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO(PI)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 an Notification 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.
7. The Director Education (FAITA), Peshawar.
8. Copy to Mr. Gani Usman KPK.

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Rasheed

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3. The Director Curriculum & Teachers Education Abbottabad.
4. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database (E&S) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officer 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. Master File.

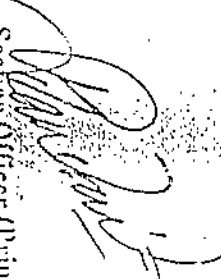
Sd/-
Section Officer (Primary)

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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 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 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. Master File.


Section Officer (Primary)


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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-10).	(i) Seven 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) MA 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) Ten per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Arts and Sciences) 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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			<p>(iv) one per cent from amongst the _____ Material Specialists with at least five years service as such and having qualification mentioned in column No.3; and -</p> <p>(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 -</p>
<p>2 ✓</p> <p>Senior Arabic Teacher (SAT) (BPS-16)</p>			<p>(b) Fifty per cent by initial recruitment.</p> <p>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.</p>
<p>3</p> <p>Senior Theology Teacher (STT) (B-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>4.</p> <p>Senior Certified Teacher (SCT) (General) (BPS-16)</p>		<p>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>	

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2. Senior Arabic Teacher (S.A.T) (BPS-16)			<p>(iv) one per cent from amongst International National Specials with atleast five years service/ such and having specific mentioned in report No. 3, and</p> <p>(v) one per cent from amongst Arabic Teachers with at least 15 years service as such and having qualification mentioned in Clause No. 3; and</p> <p>(vi) Fifty per cent by initial recruitment.</p>
3. Senior Theology Teacher (S.T) (B-16)			<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>
4. Senior Certified Teacher (S.C.T) (General) (B-16)			<p>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 Teachers (General).</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.

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Industrial Arts) (BPS-16)	6. Senior Certified Teacher (Agriculture) (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).
	7. Senior Drawing Master (BPS-15)	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).
	8. Senior Certified Teacher (SCT) (Honor Economics) (BPS-16)	By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Honor Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Honor 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.

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<p>Arabic Teacher (AT) (BPS-15)</p>	<p>(i) Second Class Secondary School Certificate, from a recognized Board with Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul 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</p> <p>(ii) Second Class Master's Degree in Arabic from a recognized University.</p>	<p>20 to 35 years</p> <p>By initial recruitment</p> <p style="text-align: center;">14</p>
<p>Theology Teacher (TT) (BPS-15)</p>	<p>(iii) Second Class Secondary School Certificate, from a recognized Board with Shahadatul Alamia from a recognized Tanzimatul 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</p> <p>(iv) Second Class Master's Degree in Islamiyat from a recognized University.</p>	<p>20 to 35 years</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 qualification prescribed for initial recruitment of Theology Teacher.</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>Senior Qari (BPS-15)</p>		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification as prescribed for initial recruitment.</p>
<p>Certified Teacher (General) (BPS-15)</p>	<p>Bachelor'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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<p>✓ Teacher (AT) (BPS-15)</p>	<p>(i) Second Class Secondary School Certificate from a recognized Board with Shabbatul Alaminia (di Uloomul Arabia wal Islamia from a recognized Tanziimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Chitragh Swat, Darul Uloom Chitral, Darul Uloom Darosh Swat, 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>20 to 35 years.</p>	<p>By initial recruitment</p>
<p>11. Theology teacher (part) (BPS-15)</p>	<p>(i) second class secondary school Certificate from a recognized Board with Shabbatul Alaminia from a recognized Tanziimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Chitragh 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</p> <p>(ii) Second Class Master's Degree in Islamicia from a recognized University.</p>	<p>20 to 35 years.</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-qualification, from amongst the Senior Quis, with at least five years service and having qualification prescribed for initial recruitment of Theology Teachers.</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>12. Senior Qari (BPS-15)</p>	<p>(i) Second Class Master's Degree in Islamicia from a recognized University.</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) Promotion, on the basis of seniority-qualification, from amongst Quis, with at least five years service as such and having qualification prescribed for initial recruitment.</p>
<p>13. Certified Teacher (Generally 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> <p>(b) Promotion, on the basis of seniority-qualification, from amongst Quis, with at least five years service as such and having qualification prescribed for initial recruitment.</p>

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	<p>Certificate or 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).</p> <p>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>(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</p> <p>(ii) Bachelor's Degree from a recognized</p>	<p>18 to 35 Years</p>	<p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</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</p> <p>(ii) 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>

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Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.

<p>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>(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-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);</p> <p>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 year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p> <p>(ii) 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>
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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>15. Certified Teacher (Agriculture) (EPS-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 a recognized</p>	<p>18 to 35 Years</p>	<p>Note: In case of non availability of suitable person for promotion, then by initial recruitment. (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 (Agriculture); 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</p>	<p>18 to 35 years.</p>	<p>(Industrial Arts)</p> <p>Provided that if no school candidate is available amongst the Primary School Head Teachers at 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>Note: In case of non availability of school 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 school candidate is available amongst the</p>
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University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).

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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 (Agriculture).</p>		<p>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 (Agriculture).</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 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 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) Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p> <p>(b) Forty per cent by initial recruitment; and 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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any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).

17

16. Certified Teacher (Home Economics)

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(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	18 to 35 years.
(ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree or	14
(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	1
(iv) Bachelor's Degree from a recognized	

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).

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

(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 as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics);
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	

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	<p>University with one year vocational training from any Government training centre 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>Note: 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>Note: 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>Note: 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) Fifty 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 Heo 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 on the basis of seniority-cum-fitness from Senior Primary School Teacher with at least 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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18	Physical Education Teacher (BPS-15)	Bachelor's Degree from a recognized University with one year Junior Diploma in Physical Education course or any 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> <p>Note: 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> <p>By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers</p>
19.	Primary School Head Teacher (PSHT) (BPS-15)			
20.	Senior Primary School Teacher (BPS-14)			

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18. Physical Education Teacher (BPS-15).	Bachelors 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; at (b) twenty per cent by promotion, on a basis of seniority-cum-fitness, from amongst the Primary School He Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher. Provided that if no such candidate is available for 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 Physical Education Teacher.
19. Primary School Head Teacher (PSHT) (BPS-15).	Bachelors Degree from a recognized University with one year Junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	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.
20. Senior Primary School Teacher (BPS-14).		By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers.

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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	with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher. By initial recruitment on merit at Union Council level: provided that if no suitable candidate 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.

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21. Primary School Teacher (Urs-13)	(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. (iii) Intermediate with Hifz-e-Quran and Qirat Saraf from a recognized Institution.	18 to 35 years.	With at least five years service as such; having qualification prescribed for recruitment of Primary School Teacher. By initial recruitment carried at Union Council level; provided that if no suitable candidate within the Union Council is available, then if the adjacent Union Councils consent.
22. (Urs-12)	Intermediate with Hifz-e-Quran and Qirat Saraf from a recognized Institution.	18 to 35 years.	By initial recruitment.

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

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20/total marks =
HSSC	Marks obtained X 20/total marks =
BA/BSc	Marks obtained X 20/total marks =
M.A Arabic/Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Waafaqul Madaris	Marks obtained X 20/total marks =
Other MA/M.Sc/M.Ed/M.A Edu	Marks obtained X 15/total marks =
MPhil/PhD	Marks = 05

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20/total marks =
HSSC	Marks obtained X 20/total marks =
BA/BSc	Marks obtained X 20/total marks =
MA/M.Sc/M.Ed/M.A Edu	Marks obtained X 20/total marks =
M.A Islamia/Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Waafaqul Madaris	Marks obtained X 15/total marks =
MPhil/PhD	Marks = 05

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Category of Qualification	Total Marks 100
SSC	Marks obtained X 20/total marks =
Qari Saad from a recognized Institution	Marks obtained X 20/total marks =
HSSC	Marks obtained X 20/total marks =
BA/BSc	Marks obtained X 20/total marks =
MAM.ScM.EdMA Edu	Marks obtained X 15/total marks =
MPhil/PhD	Marks = 05

Certified Teacher
(General, Industrial Arts, Agriculture, Home Economics)

Category of Qualification	Total Marks 100 For Humanities group of Intermediate/Graduation Level.	For Candidate of Science group
SSC	Marks obtained X 20/total marks =	5 Extra marks for FSc. 5 Extra marks for BSc and
HSSC	Marks obtained X 20/total marks =	5 Extra marks for MSc will be added to the total
BA/BSc	Marks obtained X 20/total marks =	score obtained by a candidate during his selection.
CT Certificate/Diploma in Education /ADP	Marks obtained X 20/total marks =	
MAM.ScM.EdMA Edu	Marks obtained X 15/total marks =	
MPhil/PhD	Marks = 05	

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Inventory Sheet

Quantity of Distribution Total Value Full Condition of Storage Group

NO. Apple Orchard 25% 2000 5

NO. Washington 2000 5

NO. X 2000 2000 5

NO. Washington 2000 5

NO. Washington 2000 5

NO. Washington 2000 5

NO. Washington 2000 5

NO. Washington 2000 5

NO. Washington 2000 5

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Primary School Teacher

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Category of Qualification	Total Marks 100 For Humanities group of Intermediate Level	For Candidate of Science group
SSC	Marks obtained X 20/total marks =	5 Extra marks for FSc, 5 Extra marks for BSc and score obtained by a candidate during his selection.
HSSC	Marks obtained X 10/total marks =	
BA/BSc	Marks obtained X 25/total marks =	
PST Certificate/Diploma in Education/ADE	Marks obtained X 20/total marks =	
MA/M.Sc/M.Ed/M.A Edn	Marks obtained X 20/total marks =	
MPhil/PhD	Marks = 05	

Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.
2. The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/forged/bogus upon scrutiny/verification, the service of the teacher concerned shall be terminated and the amount paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery/fraud under the relevant law.
4. Deni Asnad from recognized Tanzeemat-ul-Waqafat Madaris, 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 will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities Group of Intermediate Level	For Candidate of Science Group
SSC	Marks obtained X 20 / Total marks =	5 Extra marks for SSC 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the final score obtained by a candidate of any of the above.
HSSC	Marks obtained X 10 / Total marks =	
B.A/B.Sc	Marks obtained X 25 / Total marks =	
POT Certificate/ Diploma in Education/ H.D.E.	Marks obtained X 10 / Total marks =	
UNEMPLOYED / U.A. Etc	Marks obtained X 20 / Total marks =	
UNEMPLOYED	Marks = 03	

Other conditions:

- The concerned Reserving Authority will authenticate and verify the documents and make the appointment of per prescribed rule and regulations.
- The merit list prepared by the authority of appointment orders within shortest possible time, not exceeding ninety days.
- Merit list after making necessary corrections while addressing the observations/objections/objections, followed by requisite appointment order.
- In case a document(s) later found falsified/ forged/ bogus upon scrutiny/ verification, the service of the teacher concerned shall be terminated and the candidate held to be liable for recovery of cost of examination.
- Order issued from recruitment/ recruitment-notifications/ Madarati, Dardul Ullaham Saidu Sharif Swat, Dardul Ullaham Chaudhary Swat, Dardul Ullaham Ghani, Dardul Ullaham Ghani and any other Government (via Dardul Ullaham), as notified by the Government from time to time will be binding on the candidate.

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated the April 24, 2013.

No. SO(PE)E/S/SSRC/Meeting/2013/Teaching Cadre-In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO(PE)E/S/SSRC/Meeting/2012/Teaching Cadre, dated: 13.11.2012, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix:-
(i) against Sr. No. 2, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with Si Edalat Alia Jil (Ib-samal) Arabia wal Islamiya from Tanzimunnal Wasitqud Aladris Aladris recognized by Higher Education Commission of Federal Islamic State of Saudi Arabia, Darrul Uloom Charbagh Swat, Darrul Uloom Chitral, Darrul Uloom Dardar and any other Government run Darul Uloom, as to effect of the amendment herein, for details the case may be."

(Signature)
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GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
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(ii) against Sr. No. 3, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-juniority, from amongst the Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with Shahdadi Alia Fii Uloomul Arabia wal Islamia from FanzimusalWalaqu/Madaris /Madaris recognized by Higher Education Commission 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 the case may be."

(iii) against Sr. No. 4, for the existing entries, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Senior Certified Teacher (SCT) (BPS-15)			By promotion, on the basis of seniority-juniority, from amongst the Certified Teacher (General), Junior Teacher (Industrial Arts), Certified Teacher (Agriculture) and Certified Teacher (Home Economics) of the concerned districts with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General), Certified Teacher (Industrial Arts), Certified Teacher (Agriculture), Certified Teacher (Home Economics) having qualification of B.Ed /M.A Education, B.S. Ed or equivalent qualification from recognized University or Institution, as the case may be."

(iv) against serial No. 5, 6 and 7 the existing entries shall respectively be deleted:

Office of the
Director, Government
Education Department,
Islamabad

21/11/2014

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serial No. 5, 6, 7, 8, 9, 10,

(v) serial No. 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21 and 22 shall be renumbered as serial No. 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 and 19, for the existing entry; the following shall be substituted,

(vi) against serial No. 6, as so renumbered, in column No. 5, for the existing entry; the following shall be substituted, namely:

"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 prescribed for initial recruitment of Physical Education Teacher or having Bachelor's Degree or equivalent qualification from a recognized University with Senior Diploma in physical Education/Diploma in physical Education/B. P. Ed. or equivalent qualification from recognized University or Institution, as the case may be."

(vii) against serial No. 9, as so amended, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Qaris, with at least five years service as such and having qualification prescribed for initial recruitment of Qari or having immediate with Qirat Samad from a recognized Board/Institution, as the case may be."

(viii) against serial No. 16, as so amended, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Primary School Teachers and Primary School Teachers, with at least ten years service as Senior Primary School Teacher and Primary School Teacher, and

(ix) against serial No. 17, as so amended, in column No. 5, for the existing entry, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher or having qualification of CI/B.Ed./A.A. Education from a recognized University or Institution, as the case may be."

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SECRETARY TO GOVERNMENT OF THE KHIBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PTTE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRI Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. The Deputy Director, EMIS (SSSE) Department Khyber Pakhtunkhwa Peshawar.
12. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (MSE) in Khyber Pakhtunkhwa.
14. All District Account Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers in FATA.
16. All Agency Account Officers 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 ESSE Khyber Pakhtunkhwa, Peshawar.
21. PS to Secretary ESSE Khyber Pakhtunkhwa, Peshawar.
22. Minister file.

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(HR ASADU)
SECTION (HR/PR/300)

OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN
General Seniority List of TT Teachers (Male) District Mardan

S. No.	Seniority No.	Name with Academic & Professional Qualification	Grade	Father's Name	BPS Post Field	Date of Birth	Domile	Date of 1st Entry into Govt. Service	Date of Appointment in Present Post	Place of Posting	TT passing Date
28	28	Amir ul Haq	BA	Abdul Haq	TT 07	09/05/1959	Mardan	10/12/1986	10/12/1986	GHS Anar Bala	10/12/1985
29	29	Habib Muhammad	BA	Ashra	TT 14	01/01/1956	Mardan	15/11/1987	15/11/1987	GHS Farah Chakar	15/11/1987
30	30	Frankhah	MA	Abdul Razaq	TT 14	01/04/1958	Mardan	16/11/1987	16/11/1987	GHS Barchada	16/11/1987
31	31	Abdul Khaliq	FA	Ashra	TT 14	15/07/1967	Mardan	16/11/1987	16/11/1987	GHS Lund Khwar	16/11/1987
32	32	Amerul Rahman	SSC	Abdul Razaq	TT 07	20/09/1967	Mardan	24/10/1988	24/10/1988	GHS Farah Bhal	24/10/1988
33	33	Muhammad Burhan	MA	Ashra	TT 09	15/03/1965	Mardan	31/10/1988	31/10/1988	GHS Hassanabad T Bha	31/10/1988
34	34	Abdul Rehman	SSC	Sanaid	TT 07	04/05/1962	Mardan	01/11/1988	01/11/1988	GHS Chah Dreni	01/11/1988
35	35	Muhammad Tariq	SSC	Abdul Qadir	TT 07	16/03/1960	Mardan	01/12/1988	01/12/1988	GHS Hassanabad	01/12/1988
36	36	Ihsan Ullah	FA	Sanaid	TT 07	10/02/1968	Mardan	26/10/1989	26/10/1989	GHS Gacdar	26/10/1989
37	37	Muhammad Yousof	FA	Ashra	TT 07	01/06/1961	Mardan	30/10/1989	30/10/1989	GHS Farah	30/10/1989
38	38	Rahmat Jan	SSC	Ashra Jan	TT 07	07/06/1965	Mardan	07/11/1989	07/11/1989	GHS H20 Landaji	07/11/1989
39	39	Muhammad Ishtiaq	SSC	Ashra	TT 14	11/02/1968	Mardan	21/11/1985	01/02/1990	GHS Barchada	01/02/1990
40	40	Muhammad Qasim	SSC	Ashra	TT 14	10/01/1962	Mardan	10/03/1990	10/03/1990	GHS Jand	10/03/1990
41	41	Muhammad Pervez	D Com	Abdul Haq	TT 07	15/07/1965	Mardan	04/03/1987	15/04/1990	GHS Chah Dreni	15/04/1990
42	42	Sanaid Ahmad	FA	Sanaid	TT 07	30/03/1966	Mardan	30/04/1990	30/04/1990	GHS Farah Kargood	30/04/1990
43	43	Abdul Saeed	MA	Ashra	TT 07	29/12/1964	Mardan	16/11/1997	12/03/1991	GHS Chah Dreni	12/03/1991
44	44	Farah Khan	MA	Ashra	TT 07	10/03/1958	Mardan	02/05/1988	07/05/1991	GHS Hassanabad T Bha	07/05/1991
45	45	Sanaid Khan		Sanaid	TT	02/05/1956	Chah Dreni	21/09/1985	26/01/1992	GHS Chah Dreni	26/01/1992
46	46	Johangir Khan	FA	Ashra	TT 14	01/01/1957	Mardan	01/03/1992	01/03/1992	GHS Hassanabad	01/03/1992
47	47	Farah Khan	FA	Sanaid	TT 09	15/03/1955	Mardan	09/12/1988	26/02/1992	GHS Hassanabad	26/02/1992
48	48	Muhammad Saad	BA	Ashra	TT 07	01/02/1955	Mardan	01/04/1992	01/04/1992	GHS Hassanabad	01/04/1992
49	49	Ayash Khan	MA	Ashra	TT 14	03/03/1955	Mardan	01/04/1992	01/04/1992	GHS Chah Dreni	01/04/1992
50	50	Abdul Samad	FA	Ashra	TT 07	01/07/1957	Mardan	01/04/1992	01/04/1992	GHS Hassanabad	01/04/1992
51	51	Muhammad Rafiq	FA	D Nizam	TT 09	11/06/1952	Mardan	02/04/1992	02/04/1992	GHS Hassanabad	02/04/1992
52	52	Muhammad Saqar	MA	Khalid	TT 07	03/03/1970	Mardan	12/04/1992	12/04/1992	GHS Hassanabad	12/04/1992
53	53	Muhammad Amir	MA	Sanaid	TT 09	13/03/1971	Mardan	30/04/1992	30/04/1992	GHS Hassanabad	30/04/1992
54	54	Sanaid Khan	BA	Ashra	TT 09	01/03/1957	Mardan	01/05/1992	01/05/1992	GHS Hassanabad	01/05/1992

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OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION WARDAN
General Seniority List of TT Teachers (Male) District Wardan

30

S. No.	Name with Academic & Professional Qualification	Father's Name	BP's Post Held	Date of Birth	Domicile	Date of Joining Govt. Service	Date of Appointment on the present post	Place of Posting	TT Posting Date	Remarks
28	Asim Ullah	Abdul Haq	TT 07	09/05/1959	Mardan	10/12/1986	10/12/1986	GMS Anar Bag	10/12/1986	
29	Habib Muhammad	Faiz Muhammad	TT 14	01/01/1956	Mardan	15/11/1987	15/11/1987	GMS Farah Chakar	15/11/1987	
30	Umarullah	Abdul Rahim	TT 14	01/04/1956	Mardan	16/11/1987	16/11/1987	GMS Bakhtara	16/11/1987	
31	Abdul Kadir	Abdul Rauf	TT 14	15/02/1957	Mardan	16/11/1987	16/11/1987	GMS Luvd Khan	16/11/1987	
32	Abdul Rahman	Abdul Rauf	TT 07	20/09/1957	Mardan	24/10/1988	24/10/1988	GMS Tahir Ghani	24/10/1988	
33	Muhammad Ghani	Gul Muhammad	TT 09	15/03/1955	Mardan	31/10/1988	31/10/1988	GMS Wazir Ahmad T. Buz	31/10/1988	
34	Abdul Rehman	Syed Abdul Wahid	TT 07	04/05/1952	Mardan	01/11/1988	01/11/1988	GMS Chah Dard	01/11/1988	
35	Muhammad Tariq	Abdul Ghani	TT 07	18/03/1950	Mardan	01/12/1988	01/12/1988	GMS Husein Ahmad	01/12/1988	
36	Iman Ullah	Ghulam Rabbani	TT 07	10/04/1958	Mardan	28/10/1989	28/10/1989	GMS Ghazal	28/10/1989	
37	Muhammad Yousaf	Muza Jan	TT 07	01/05/1961	Mardan	30/10/1989	30/10/1989	GMS Faris	30/10/1989	
38	Rahmat Jan	Alam Jan	TT 07	07/06/1955	Mardan	07/11/1989	07/11/1989	GMS Huda Faris	07/11/1989	
39	Muhammad Idris	Aziz Rehman	TT 14	11/02/1958	Mardan	21/11/1989	21/11/1989	GMS Bazar Rahim	21/11/1989	IDT
40	Muhammad Qadir	Ghulam Muhammad	TT 14	10/03/1952	Mardan	10/03/1990	10/03/1990	GMS Jang	10/03/1990	IDT
41	Muhammad Pervez	Abdul Halim	TT 07	15/07/1955	Mardan	04/03/1987	15/04/1990	GMS Chahrang	15/04/1990	
42	Saqib Ahmad	Azul Hameed	TT 07	30/03/1956	Mardan	30/04/1990	30/04/1990	GMS Farah Khora	30/04/1990	
43	Abdul Saeed	Muhammad Saqib	TT 07	25/12/1954	Mardan	16/11/1991	12/03/1991	GMS Qadir Tahir	12/03/1991	
44	Faiz Khan	Alam Khan	TT 07	10/03/1958	Mardan	03/05/1984	07/09/1991	GMS Shamsul Azhar	07/09/1991	
45	Saqib Khan	Amir Shah	TT	02/05/1958	Charsada	31/03/1995	31/03/1992	GMS Daryal	31/03/1992	IDT
46	Jawad Khan	Usman Usman	TT 14	02/01/1957	Mardan	01/03/1992	01/03/1992	GMS Nisar Ahmad	01/03/1992	
47	Faiz Karim	Muhammad Aftab	TT 09	15/03/1955	Mardan	08/12/1988	28/02/1992	GMS Wajid Khan	28/02/1992	
48	Muhammad Saqib	Gul Rahim	TT 07	01/03/1955	Mardan	01/04/1992	01/04/1992	GMS Nisar Ahmad	01/04/1992	
49	Asiya Khan	Gul Gulistan Khan	TT 14	03/03/1955	Mardan	01/04/1992	01/04/1992	GMS Chahrang	01/04/1992	
50	Abdul Samad	Shahid Haq	TT 07	01/07/1957	Mardan	01/04/1992	01/04/1992	GMS Bazar	01/04/1992	
51	Muhammad Rafiq	Alam Khan	TT 09	11/03/1972	Mardan	02/04/1992	02/04/1992	GMS Bazar	02/04/1992	
52	Muhammad Saqib	Shamsul Azhar	TT 07	01/03/1970	Mardan	12/06/1992	12/06/1992	GMS Jang	12/06/1992	
53	Muhammad Aftab	Rahmat Shah	TT 09	12/03/1971	Mardan	30/04/1992	30/04/1992	GMS Bazar	30/04/1992	
54	Saqib Khan	Amir Khan	TT 09	01/01/1957	Mardan	01/05/1992	01/05/1992	GMS Bazar	01/05/1992	

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General Seniority List of TT Teachers (Male) District Mardan

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Sl. No.	Sl. No.	Name with Academic & Professional Qualifications	Grade	Category	Posting	Grade	Date of Birth	Place of Birth	Date of entry into service	Date of appointment on the present post	Place of Posting	Date of Posting	Remarks
55	55	Azhar Rehman	SSC	Senior	ASMA Saddq	TT 07	15/12/1954	Mardan	10/05/1992	10/05/1992	GHS Lund Tower	10/05/1992	
56	56	Wahid Hq	SSC	Senior	Zainool Hq	TT 07	20/09/1972	Mardan	09/09/1992	09/09/1992	GHS Purana Hqd	09/09/1992	
57	57	Muhammad Saqib		D. Rizvi	Syed Muhammad	TT 07	10/04/1965	Mardan	18/05/1987	30/09/1992	GMS Kunj	30/09/1992	10T
58	58	Sayed Ali	FA	Adm	Ahsan Khan	TT 09	11/04/1973	Mardan	29/10/1992	29/10/1992	GMS Par Hqd	29/10/1992	
59	59	Asghar Ali	FA	Senior	Bacha Gw	TT 07	15/03/1968	Mardan	01/11/1992	01/11/1992	GMS Iqbal Eqa	01/11/1992	
60	60	Sayed Hq	BA	D. Rizvi	Muhammad Hq	TT 07	05/04/1966	Mardan	05/11/1992	05/11/1992	GMS Chah Qut	05/11/1992	
61	61	Imran As	SSC	D. Rizvi	Taj Muhammad	TT 07	04/01/1965	Mardan	05/11/1992	05/11/1992	GMS Kala Khol	05/11/1992	
62	62	Ali Rehman		Senior	Chah Khol	TT 07	04/02/1963	Mardan	16/11/1992	16/11/1992	GMS Sen Behd	16/11/1992	
63	63	Hazeb Ahmad	SSC	D. Rizvi	Abdul Shakor	TT 07	10/04/1965	Mardan	04/05/1993	04/05/1993	GMS Gwjo	04/05/1993	
64	64	Hamid Ali	BA	Senior	Abdul Raizq	TT 07	20/03/1968	Mardan	04/05/1993	04/05/1993	GMS Karam	04/05/1993	
65	65	Shamul Hq	MA	Senior	Abdul Hq	TT 07	15/03/1969	Mardan	09/05/1993	09/05/1993	GMS Sarfraz	09/05/1993	
66	66	Noor Wahid	SSC	Adm	Gid Ahmad Jee	TT 14	15/05/1971	Mardan	09/05/1993	09/05/1993	GMS Shah Dard	09/05/1993	
67	67	Syed Fazl Hq	SSC	D. Rizvi	Syed Hidayatullah	TT 07	15/03/1969	Mardan	10/05/1993	10/05/1993	GMS Torji	10/05/1993	
68	68	Fazl Wahid	SSC	Adm	Toor Lal	TT 14	07/01/1966	Mardan	16/05/1993	16/05/1993	GMS Bunge Kw	16/05/1993	
69	69	Har Ahmad	MA	B. Ed	Abdul Rauf	TT 09	02/04/1969	Mardan	21/10/1993	21/10/1993	GMS Malik Akad	21/10/1993	
70	70	S. Khwaj Ahmad	BA	B. Ed	S. Muhammad Iqbal	TT 07	15/11/1972	Mardan	21/10/1993	21/10/1993	GMS Kass Azona	21/10/1993	
71	71	Muhammad Rafiq	BA	Senior	Aziz Muhammad	TT 07	07/02/1974	Mardan	22/12/1994	22/12/1994	GMS Kharir	07/02/1994	
72	72	Fazl Hq		Senior	Aziz Gwjos	TT 07	05/01/1957	Mardan	24/11/1987	25/01/1994	GMS Sarai	26/01/1994	10T
73	73	Sayed W. Rehman	MA(US)	Adm	Aziz Wahid	TT 14	07/04/1966	Mardan	14/05/1987	14/05/1987	GMS Kabin Gwjo	01/05/1994	
74	74	Sayed W. Rehman	FA	CT	Sayar Rahman	TT 07	19/03/1974	Mardan	29/03/1994	03/05/1994	GMS Gwjo	08/05/1994	10T
75	75	Muhammad Ghosior	MA	B. Ed	Shir Aziz	TT 09	15/10/1971	Mardan	26/09/1994	26/09/1994	GMS Pt Sidi	26/09/1994	
76	76	Noor Amin	BA	B. Ed	Fazl Hq	TT 09	01/11/1973	Mardan	27/10/1994	27/10/1994	GHS No. 1 Mardan	27/10/1994	
77	77	Fazal Khan	SSC	Senior	Hazem Khan	TT 07	27/09/1985	Mardan	13/11/1994	13/11/1994	GMS Gwjo	13/11/1994	
78	78	Azizullah	SSC	Adm	Muhammad	TT 07	22/04/1971	Mardan	24/11/1994	24/11/1994	GMS Sharif Hqd	24/11/1994	
79	79	Haseer	MA	Senior	Ab Muhammad	TT 09	04/11/1970	Mardan	15/12/1994	15/12/1994	GMS Hq 3	15/12/1994	
80	80	Muhammad Ahsan Khan	FA	Senior	Zoya Khan	TT 09	14/04/1974	Mardan	16/12/1994	16/12/1994	GMS B-B Gwjo	16/12/1994	Service book not completed
81	81	Muhammad Farooq	MA	N. Ed	Sher Muhammad	TT 14	13/02/1972	Mardan	18/12/1994	18/12/1994	GMS Mardan	20/03/1995	

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OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN
General Seniority List of TT Teachers (Male) District Mardan

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Sl. No.	Name with Academic & Professional Qualification	Grade	Father's Name	Post	Date of Birth	Domile	Date of entry into Govt. service	Date of Appointment on the present post	Place of Posting	Apprentice	Remarks
82	Mawla ur Rehman	FA	Mst. Fakh Bahman	TT	15/10/1975	Mardan	02/02/1995	02/02/1995	GHS Bah Cham	02/02/1995	
83	Muhammad Naveem	MA	Muhammad Qamar	TT 09	02/05/1972	Mardan	01/01/1995	01/01/1995	GHS Bahadr Khan Kori	01/01/1995	
84	AMMAR GUL	FA	Taza Gul	TT 07	25/03/1974	Mardan	16/10/1995	16/10/1995	GHS Jureha	16/10/1995	
85	Gulam Youzaf	BA	Muhammad Ibrahim	TT 14	06/04/1957	DIR	12/12/1999	05/03/1996	GHS Park Tarni Bhal	06/03/1996	
86	Muhammad Atiqul Karim	SSC	Hafiz Karim Ullah	TT 07	02/05/1958	Mardan	25/05/1996	25/05/1996	GHS Bah Cham	11/09/1996	
87	Sajid ur Adnan	SSC	Mahdi Yaq	TT 07	01/01/1953	Nowshera	05/05/1992	01/03/1997	GHS Chax Khe	01/03/1997	IDT
88	Mawla Ullah	MA	Ash Khan	TT 07	05/06/1965	Mardan	20/02/1995	23/06/1997	GHS G.M. Bagh	23/06/1997	
89	Syed Asif Uddin	MA	Syed Imtiaz Uddin	TT 07	02/01/1971	Mardan	23/05/1997	23/06/1997	GHS Sulph Dheer	23/06/1997	
90	Gulshan Ullah	MA	Nazid Hq	TT 14	15/03/1978	Mardan	23/05/1997	20/02/1997	GHS Alwal Akbar	02/02/1997	IDT
91	Baqi Bahan	FA	Mahdi ur Hq	TT 07	01/04/1955	Mardan	12/12/1996	10/12/1995	GHS No. 3	05/02/1995	
92	Muhammad Ahmad	MA	Azhar Pathan	TT 14	20/04/1975	Mardan	05/02/1995	05/02/1995	GHS Mahb Benda	09/02/1995	
93	Zainoor Hq	FA	Hq ur Hq	TT 14	14/04/1958	Mardan	05/02/1995	05/02/1995	GHS Chamhar	10/02/1995	
94	M. Zahid Hq	FA	Safir Rehman	TT 14	01/01/1972	Mardan	10/02/1995	10/02/1995	GHS Narden Tor	10/02/1995	
95	M. Asrar ul Shah	MA	M. Mahdi Shah	TT 14	06/09/1974	Mardan	10/02/1994	10/02/1994	GHS Sora	23/02/1994	
96	Hammad	FA	Mahdi ur Pathan Benda	TT 14	04/09/1970	Mardan	23/02/1994	23/02/1994	GHS Sora	24/02/1994	
97	Azad Darym	FA	Laila Banoth	TT 14	30/12/1969	Mardan	24/02/1994	24/02/1994	GHS Tarni	26/02/1994	
98	Muhammad ur Rahman	BA	Muhammad Zaar	TT 09	07/02/1974	Mardan	25/02/1993	25/02/1993	GHS Bahway Sakon	04/04/1993	
99	Muhammad ur Rahman	SSC	Khan Bahadar	TT 07	01/01/1975	Mardan	04/04/1993	04/04/1993	GHS No. 2 Bah. ul Guri	05/04/1993	
100	M. Raees Khan	FA	Mahdi ur Rahman	TT 14	30/12/1969	Mardan	04/04/1993	04/04/1993	GHS B. ul Sora	19/04/1993	
101	Muhammad Ayaz	BA	Muhammad Jabeen	TT 14	12/08/1973	Mardan	15/02/1993	15/02/1993	GHS Kander	03/04/1993	
102	Muhammad Tariq	MA	Muhammad Qamar	TT 09	24/05/1976	Mardan	04/02/1999	03/02/1997	GHS Laboor C. Sora	03/02/1997	
103	M. Shaukat	FA	Muhammad Shah	TT 09	24/04/1959	Mardan	03/02/1999	03/02/1997	GHS G.M. Bah. ul	03/04/1999	
104	Aziz ur Rehman	MA	Hq ur Rehman	TT 14	17/04/1970	Mardan	03/02/1999	03/02/1997	GHS Korb Lumb. Sora	10/04/1999	IDT
105	Azad Chahoor	BA	G.M. ul Hq	TT 14	24/04/1970	Mardan	10/04/1999	10/04/1999	GHS Jureh	11/05/1999	
106	Umair Gul	MA	Too Lab	TT 17	12/04/1953	Mardan	01/11/1993	20/12/1997	GHS Bah. ul Sora	20/12/1997	
107	Djal Khan	SSC	Taqi ur Khan	TT 14	09/02/1975	Mardan	23/12/1999	03/12/1997	GHS Sora	23/12/1997	
108	Zul Rehman	FA	Gul Rehman	TT 14	05/02/1970	Mardan	23/12/1999	03/12/1997	GHS Sora	23/12/1997	

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General Seniority List of TT Teachers (Male) District Mardan

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Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Education	Grade	Subject	Home	BPS Post	Date of Birth	Home	Date of 1st Entry into Service	Date of Appointment (On and present post)	Place of Posting	Passing Examinations	Remarks
109	109	Imran Ullah	MA	B Ed	Churhaidan	TT 14	07/24/1975	Lardan	23/12/1999	23/12/1999	GHS Guhat	23/12/1999		
110	110	Rashed Ahmad	FA	Senior Teacher	Akbar Rahim	TT 09	12/24/1975	Lardan	23/12/1999	23/12/1999	GMS Mohabbat Abad	23/12/1999		
111	111	Rameez Hqs	MA	Asstia	Sheraz Hqs	TT 09	03/21/1975	Lardan	27/12/1999	27/12/1999	GMS Kora Talih Baji	27/12/1999		
112	112	Abul Muhammad Hqs	SSC	Senior Teacher	Muhammad Ayub	TT 07	10/21/1979	Lardan	28/12/1999	28/12/1999	GMS Salang Kori	28/12/1999		
113	113	Muhammad Ayub	BA	Asstia	Muhammad Akram	TT 14	25/09/1972	Lardan	28/12/2000	03/01/2002	GMS Shamsan Kori	03/01/2002		
114	114	Muhammad Quresh	BA	Asstia	Rehan Ullah	TT 14	30/09/1969	C-1 Saida	28/12/1998	01/10/2000	GHS Sangro	01/10/2000		
115	115	Hafeez Behar Ahmad	BA	Asstia	Shereen Khan	TT 14	17/09/1971	Lardan	13/01/1998	11/02/1998	GHS No. 1 Lardan	22/12/2000		
116	116	Noor Hqs	MA	Asstia	Liqat Habb Gid	TT 10	24/10/1952	Lardan	23/09/1976	04/10/2001	GMS Baw Baw	04/10/2001		IDT
117	117	Husamud Din	SSC	D Nizam	Saad ud Din	TT 10	13/09/1959	Lardan	23/11/1991	01/01/2002	GMS Sahn Roor Pld T. Bn	01/01/2002		IDT
118	118	Muhammad Sijal	D Nizam	D Nizam	Haji Muhammad	TT 07	03/12/1960	Pvt Zwar	20/11/1999	01/02/2002	GMS Mahmood Asad	01/02/2002		IDT
119	119	Ludhi Ullah	FA	Senior	Shafiq Ullah	TT 14	09/02/1969	Lardan	24/01/1992	01/04/2003	GMS Kora Talih Baji	01/04/2003		IDT
120	120	Usaid Ullah	MA	Asstia	Muhammad Ullah	TT 10	20/11/1956	Lardan	20/11/1978	21/01/2004	GMS Tambar	21/01/2004		IDT
121	121	Imran Ullah	BA	Senior	Abdullah	TT 07	14/02/1991	Lardan	20/04/2004	06/04/2004	GHS Baryeha Dhen	06/04/2004		IDT
122	122	Muhammad Iqbal		Senior	Asad Hamid	TT 07	01/11/1966	C-8	22/04/1993	01/06/2005	GMS Zafar Dhen	01/06/2005		IDT
123	123	Syed Atbar Sadiq	FA	Asstia	Bilal Khan	TT 14	10/02/1972	C-8	22/04/1998	03/12/2005	GMS Tahir Baji	03/12/2005		IDT
124	124	Zameer Hussain	MA	Asstia	Imranullah	TT 14	14/02/1972	Lardan	22/02/2007	22/02/2007	GMS Hqs No. 2	22/02/2007		IDT
125	125	Muhammad Asim	FA	Asstia	Khan Baryeha	TT 09	30/09/1964	Lardan	23/02/2007	23/02/2007	GMS Lardan	23/02/2007		
126	126	Muhammad Hussen	SSC	Asstia	Muhammad Ishaq	TT 14	20/02/1970	Lardan	23/03/2007	23/02/2007	GMS Ganji T Baji	23/02/2007		
127	127	Muhammad Asad	SSC	Asstia	Rahman Gid	TT 14	01/02/1971	Lardan	23/02/2007	23/02/2007	GHS Tahir Baji	23/02/2007		
128	128	S. Muhammad Awi	FA	Asstia	S. Muhammad Sadiq	TT 07	19/05/1971	Lardan	23/02/2007	23/02/2007	GMS B. A. Gani	23/02/2007		
129	129	Muhammad Asim	MA	Asstia	Khan Baryeha	TT 14	15/02/1972	Lardan	23/02/2007	23/02/2007	GMS Kora Talih Baji	23/02/2007		
130	130	Hafizullah	MA	Asstia	Asad Sadiq	TT 14	02/02/1973	Lardan	23/02/2007	23/02/2007	GMS Hqs No. 1	23/02/2007		
131	131	Muhammad Hussen	FA	Asstia	Muhammad Ishaq	TT 14	02/02/1973	Lardan	23/02/2007	23/02/2007	GMS Tahir Baji	23/02/2007		
132	132	S. Asad Ahmad Shah	SSC	Asstia	S. Ahmad Hussain	TT 14	05/09/1974	Lardan	23/02/2007	23/02/2007	GMS Gural	23/02/2007		
133	133	Said Raza Ahmad	SSC	Asstia	Said Ahmad Ahmad	TT 07	15/09/1974	Lardan	23/02/2007	23/02/2007	GMS Nawan Kori Baryeha	23/02/2007		
134	134	Rozdil Hqs	FA	Senior	Sybil Khan	TT 09	10/09/1974	Lardan	23/02/2007	23/02/2007	GMS Parvoo Dhen	23/02/2007		
135	135	Qazi Muhammad Jibran	FA	Asstia	Qazi Faisal Baryeha	TT 14	31/01/1975	Lardan	23/02/2007	23/02/2007	GMS Hqs No. 1	23/02/2007		

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General Seniority List of TT Teachers (Male) District Mardan

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Sl. No.	Serial No.	Name with Academic & Professional Qualification	Grade	Spec. Name	BPS	Date of Birth	Domicile	Date of entry into Govt. Service	Date of Appointment on present post	Place of Posting	TT Seniority Appointment Date
136		Sheh Lunnara	SSC	Sheh Lunnara	TT 07	02/07/1975	Mardan	23/02/2007	23/02/2007	GHS Cherna	23/02/2007
137		Fazl Rabbin	BA	Fazl Rabbin	TT 14	05/01/1978	Mardan	23/02/2007	23/02/2007	GHS Dargana Dheri	23/02/2007
138		Muhammad Javed Zeb Khan	SSC	Abdul Hussian	TT 07	14/02/1976	Mardan	23/02/2007	23/02/2007	GHS Saddq Abad	23/02/2007
139		Gul Bad Shah	FA	M. Tariq Zai	TT 14	24/02/1976	Mardan	23/02/2007	23/02/2007	GHS I.L. Muhammad Din Kila	23/02/2007
140		S.M. Yahya Jan		S. Saadullah Jan	TT 07	15/02/1978	Mardan	23/02/2007	23/02/2007	GHS Gujral	23/02/2007
141		Khalid Mahmood	MA	Muhammad	TT 14	15/02/1978	Mardan	23/02/2007	23/02/2007	GHS Koi Jumra	23/02/2007
142		Syed Bilal	MA	Mehboobullah Rahman	TT 14	02/02/1979	Mardan	23/02/2007	23/02/2007	GHS Uda Baz Chaz	23/02/2007
143		Shahbaz Rahman	SSC	Gul Rahman	TT 14	05/01/1977	Mardan	23/02/2007	23/02/2007	GHS Barangan	23/02/2007
144		Abdul Khaliq	MA	Arfaul Shah	TT 07	22/02/1978	Mardan	23/02/2007	23/02/2007	GHS Kailana	23/02/2007
145		Raza Aiman	FA	Muhammad Khan	TT 14	13/02/1978	Mardan	23/02/2007	23/02/2007	GHS Halhan	23/02/2007
146		Fazl Kohin	SSC	Fazl Kohin	TT 14	02/02/1971	Mardan	23/02/2007	23/02/2007	GHS Koi Baran	23/02/2007
147		Muhammad Shoaib	BA	Muhammad	TT 07	02/02/1971	Mardan	23/02/2007	23/02/2007	GHS Q. J. D. G. M. T. Bahi	23/02/2007
148		Abdul Rahman	SSC	Fazl Mahan	TT 07	13/02/1972	Mardan	23/02/2007	23/02/2007	GHS Dheri Lagan	23/02/2007
149		Gul Saad Khan		Shahzad Khan	TT 14	25/02/1973	Mardan	23/02/2007	23/02/2007	GHS Gairi Karpura	23/02/2007
150		P. J. Uddin	SSC	Abdul Hakeem	TT 14	23/02/1973	Mardan	23/02/2007	23/02/2007	GHS Baidi Kila	23/02/2007
151		Shah Bahadar	MA	Hazrat Gul	TT 14	05/01/1974	Mardan	23/02/2007	23/02/2007	GHS Kailana Gauda	23/02/2007
152		Abdul Mujib	FA	Babar Ahmad	TT 14	24/02/1975	Mardan	23/02/2007	23/02/2007	GHS Peral	23/02/2007
153		Fazal Ad	FA	Muhammad	TT 14	02/02/1975	Mardan	23/02/2007	23/02/2007	GHS Baidi Kila	23/02/2007
154		M. A. Ahmad	SSC	Hazrat Gul	TT 14	03/02/1976	Mardan	23/02/2007	23/02/2007	GHS Baidi Kila	23/02/2007
155		Shahzad	BA	Raza Gul	TT 07	22/02/1976	Mardan	23/02/2007	23/02/2007	GHS Q. J. D. G. M. T. Bahi	23/02/2007

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General Seniority List of TT Teachers (Male) District Mardan

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Sl. No.	Seniority No.	Name with Academic & Professional Qualification	Grade	Category	Family's Name	Post Held	Date of Birth	Domestic Certificate	Date of last entry into Govt. service	Date of Appointment of the present post	Place of Posting	Present Appointment
156	156	Abdul Aziz	FA	Ashra	Rahim Karim	TT 07	20/12/1976	NA	24/02/2007	24/02/2007	GHS Gul Bagh	24/02/2007
157	157	Nasrullah	FA	Ashra	Abdul Ghani	TT 14	27/03/1977	NA	24/02/2007	24/02/2007	GHS Ghalla Dher	24/02/2007
158	158	Muhammad Haq	BA	Senior Ashra	Usbah Ahmad	TT 14	01/02/1978	NA	24/02/2007	24/02/2007	GHS Ibrahim Khan Kal	24/02/2007
159	159	M Ashfaq Ali	FA	Ashra	Aman Gul	TT	16/04/1978	NA	24/02/2007	24/02/2007	GHS Rustim	24/02/2007
160	160	Nasreen ul Haq	SSC	Ashra	Abdul Haq	TT 02	02/03/1978	NA	29/02/2007	29/02/2007	GHS Abi Marican	26/02/2007
161	161	Muhammad Ibrahim	SSC	Ashra	Udham J. Abdul Satar	TT 14	02/03/1977	NA	28/02/2007	28/02/2007	GHS Shahn Banja	26/02/2007
162	162	Amrooqan	SSC	Ashra	Muhammad Khan	TT 14	09/10/1980	NA	28/02/2007	28/02/2007	GHS Khatir Zai	22/02/2007
163	163	Muhammad	FA	Ashra	Karam Dad	TT 14	05/03/1979	NA	27/02/2007	27/02/2007	GHSSS Miryar	27/02/2007
164	164	Muhammad	NA	Ashra	Hazratullah	TT 09	04/02/1976	NA	03/02/2007	03/02/2007	GHS Sherabai	03/02/2007
165	165	Shahid Ahmad	NA	Khassia	Muhammad Farooq	TT 14	15/03/1978	NA	03/02/2007	02/10/2007	GHS Shah Baig	02/10/2007
166	166	Fazal Haq	NA	Ashra	Amna Haq Yousaf	TT 14	16/04/1978	NA	02/10/2007	02/10/2007	GHSSS Talhar	02/10/2007
167	167	Asadullah	BA	Ashra	Omer Gul	TT 14	18/03/1979	NA	02/10/2007	02/10/2007	GHS Shandan	02/10/2007
168	168	Muhammad Haq	NA	B Ed	Aziz Haq	TT 14	05/04/1981	NA	02/10/2007	02/10/2007	GHS Pato Dher	02/10/2007
169	169	Fazal Rahman	NA	Ashra, B Ed	Behram Khan	TT 14	20/05/1978	NA	02/10/2007	02/10/2007	GHS Sero Shah	02/10/2007
170	170	Muhammad	FA	Ashra	Asad Ghosior Khan	TT 14	01/07/1973	NA	11/02/2007	11/02/2007	GHS Zoor Aabai	11/02/2007
171	171	A. Rahman	NA	Ashra	Sultan Muhammad	TT 14	01/01/1976	NA	22/10/2007	22/10/2007	GHS Safi Aabai	22/10/2007
172	172	Muhammad Haq	FA	Ashra	Baq Baig	TT 14	01/02/1983	NA	18/02/2009	18/02/2009	GHS Gurgala Babi	18/02/2009
173	173	Muhammad Asif	NA	Ashra	Khan Bahadar	TT 14	15/06/1981	NA	17/02/2010	17/02/2010	GHS Toru Karim	17/02/2010
174	174	Muhammad Amin	NA	AIED	Muhammad Hahm	TT 14	04/02/1981	NA	28/10/2004	18/02/2010	GHSSS Gural Gani	18/02/2010
175	175	Muhammad Amin	NA	AIED	Muhammad Hahm	TT 14	04/02/1981	NA	28/10/2004	18/02/2010	GHS Saibad	18/02/2010
176	176	Muhammad Amin	NA	B Ed	Asad Hameed	TT 14	15/03/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010
177	177	Muhammad Amin	NA	Ashra, B Ed	Shaher Khan	TT 14	12/02/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010
178	178	Muhammad Amin	NA	Ashra, B Ed	Shaher Khan	TT 14	12/02/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010
179	179	Muhammad Amin	NA	Ashra, B Ed	Shaher Khan	TT 14	12/02/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010
180	180	Muhammad Amin	NA	Ashra, B Ed	Shaher Khan	TT 14	12/02/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010
181	181	Muhammad Amin	NA	Ashra, B Ed	Shaher Khan	TT 14	12/02/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010
182	182	Muhammad Amin	NA	Ashra, B Ed	Shaher Khan	TT 14	12/02/1983	NA	18/02/2010	18/02/2010	GHS Saibad	18/02/2010

MAJESTY INVESTED

ATTACHED TO BE

OFFICE OF THE EXECUTIVE DISTRICT ELEMENTARY & SECONDARY EDUCATION MARDAN

General Seniority List of TT Teachers (Male) District Mardan

36

Seniority No.	Name with Academic & Professional Qualifications	Professional	Father's Name	BPS Post Held	Date of Birth	Domicile	Date of 1st entry into Govt. service	Date of Appointment on sheet present post	Place of posting	Processing Date	Remarks
183	Fazle Ullah	MA	Abdul Hakeem	TT 14	02/01/1953	Mardan	19/02/2010	19/02/2010	GHS Jabla	19/02/2010	
184	Laili Khan	MA	Syed Wali Ur Rehman	TT 14	03/03/1954	Mardan	19/02/2010	19/02/2010	GHS Ikram Pur	19/02/2010	
185	Farooq Ahmad	BA	Hakim Hidayatullah	TT 14	04/02/1955	Mardan	19/02/2010	19/02/2010	GHS Bahi Khan	19/02/2010	
186	Zahid Hussain	MA	Murfaq Shah	TT 14	15/01/1954	Swabi	19/11/2007	01/02/2011	GHS S-Sahbaz Garhi	01/02/2011	IDT

Copy forwarded for information and necessary action to the:-

M. A. M.

1. Director Elementary and Secy Education Khyber Pakhtunkhwa Peshawar.
2. District Coordination Officer Mardan.
3. All the Principals/Headmasters of GHSS/GHS/GUS in Mardan District with the remarks to get it noted from the concerned and submit appeal if any within 15 days of the receipt of this Seniority List to this office for correction.
4. All Masters concerned

Bahadar Khan Marwat
Executive District Officer
E&S Education/Mardan

M. A. M.

ATTACHED

Attested to be
True Copy



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

37

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(I&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-300-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:-

Total No. of TT (M) Posts duly verified by the DAO	202
1/3 share of Senior TT Posts	67
Share of promotion 100 %	67
Already Promoted to the post of Senior TT B-16.	64
Posts available for promotion to the post of Senior TT B-16.	03
Promoted to the post of Senior TT B-16 in this order	03

S. No.	Sen. No.	Name	Place of posting	Date of Birth	Remarks
1	26	Habib Muhammad	GMS Farsh Chichar	01/01/1966	Services placed at the disposal of DEO (M) Mardan for further posting.
2	51	Sadi Khan	GHS Bader Banda	01/01/1967	-----Do-----
3	127	Zauq Hussain	GHS Naseer Killi	11/01/1972	-----Do-----

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 his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammed Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

ATTESTED

3397-3902

Encl: No. / File No. / Promotion Senior TT B-16: Dated Peshawar the 28/07/2013.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Mardan.

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Amex "G"

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2013

39

Hameed-ur-Rahman,
T.T., GMS Moti Banda, Lund Khwar,
District Mardan.....

Appellant.

Versus

1. The Govt. of Khyber Pakhtunkhwa
through Secretary
Elementary & Secondary Education
Civil Secretariat, Peshawar.
 2. The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
 3. The District Education Officer (Male),
District Mardan.
 4. Mr. Zawar Hussain,
T.T., GHS Naseer Kaley,
District Mardan.....
- Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNALS
ACT, 1974 AGAINST THE IMPUGNED
NOTIFICATION DATED 28.05.2013 WHEREBY
JUNIORS TO THE APPELLANT INCLUDING
RESPONDENT NO.4 WERE PROMOTED TO THE
POST OF SENIOR T.T. (BPS-16) AGAINST WHICH
APPELLANT PREFERRED DEPARTMENTAL
REPRESENTATION ON 08.06.2013 BUT THE SAME
RECEIVED NO RESPONSE WITHIN THE
STATUTORY PERIOD OF 90 DAYS.

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40

PRAYER:

On acceptance of the instant appeal, the impugned Notification dated 28.05.2013 may graciously be set aside to the extent of Respondent No.4 and Respondents be directed to consider appellant for promotion to the post of Senior T.T. (BPS-16) w.e.f. 28.05.2013 with all consequential back benefits.

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That the appellant has qualified B.A Degree from Allama Iqbal Open University, Islamabad as well as Shahadat-ul-Alia and Shahadat-ul-Alamia from Wafaq-ul-Madaris (Credentials *Annex:-A*). He joined the Education Department as T.T. vide order dated 26.03.1998 (*Annex:-B*) and at the moment at his credit 15 years unblemished service.
2. That as per Notification dated 13.11.2012 (*Annex:-C*) as amended vide Notification dated 24.04.2013 (*Annex:-D*) 1/3rd of the total strength of the T.T. i.e. 67 shall be promoted to BPS-16 on the basis of seniority cum fitness with at least five years service and having the qualification for initial recruitment or having Bachelor's degree or equivalent qualification with Shahadat-ul-Alia from a recognized Institution to be designated as Senior Theology Teacher.
3. That as per the Seniority List (*Annex:-E*), appellant dwells at Serial No.98 while Respondent No.4 is at Serial No.124 and thus junior to the

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41

3

appellant but inspite of the same vide impugned Notification dated 28.05.2013 (*Annex:-F*) he was promoted to the next higher grade while appellant was not considered for promotion.

4. That being aggrieved of the impugned Notification, appellant preferred departmental Representation on 10.06.2013 (*Annex:-G*) but the same was not disposed off within the statutory period of 90 days hence this appeal inter-alia on the following grounds:-

Grounds:

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned Notification, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That Respondent No.4 is junior to appellant and therefore he was not entitled for promotion but it was the appellant who being senior was entitled to be considered for promotion, therefore, the impugned Notification is illegal and thus liable to be set aside.
- C. That the Sanad Shahadat-ul-*Alia* was referred for verification by Respondent No.3 to the concerned quarter which was duly verified and communicated to him vide letter received on 18.12.2012 (*Annex:-*

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H) but even then appellant was not considered for promotion to the next higher grade for malafide reasons.

D. That appellant would like to offer some other grounds with the permission of this Hon'ble Tribunal during the course of arguments.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to appellant.

[Handwritten Signature]
Appellant
[Handwritten Signature]
Khaled Rahman,
Advocate, Peshawar.

Through

Dated: 9 / 10/2013

Attested to be
True Copy

43



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail raj_q_kk851@yahoo.com

Annex "H"

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Ks.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:-

Total No. of TT (M) Posts duly verified by the DAO	202
1/3 share of Senior TT Posts	67
Share of promotion 100 %	67
Already Promoted to the post of Senior TT B-15	67
One TT B-16 Sharifullah retired from service.	01
Posts available for Promotion	01

S. No.	Sen No.	Name	Place of posting	Date of Birth	Remarks
1	95	Hameed ur Rahman	GMS Muti Banda	07/02/1974	Services placed at the disposal of DEO (M) Mardan for further posting.

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 his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

1647-53

Endst: No. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 18/04/2014.

Copy forwarded for information and necessary action to the:-

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

8/8/2014

Dy: Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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True Copy
H

Annex I

44

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1487/2013



Hameed-ur-Rahman,
T.T., GMS Moti Banda, Lund Khwar,
District Mardan.....Appellant.

Versus

1. The Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Civil Secretariat, Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male), District Mardan.
4. Mr. Zawar Hussain, T.T., GHS Naseer Kaley, District Mardan.....Respondents

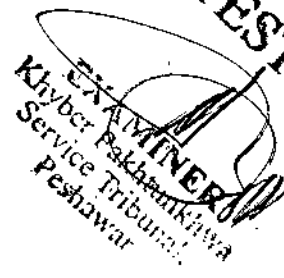
SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 28.05.2013 WHEREBY JUNIORS TO THE APPELLANT INCLUDING RESPONDENT NO.4 WERE PROMOTED TO THE POST OF SENIOR T.T. (BPS-16) AGAINST WHICH APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION ON 08.06.2013 BUT THE SAME RECEIVED NO RESPONSE WITHIN THE STATUTORY PERIOD OF 90 DAYS.

Handwritten signature and date 9/10/13

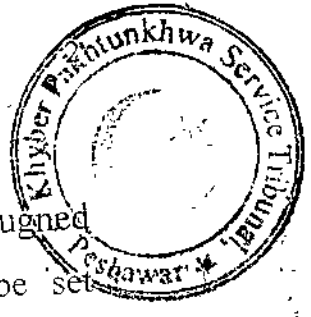
re-submitted to and filed.

Handwritten signature and date 5/11/13

ATTESTED



45



PRAYER:

On acceptance of the instant appeal, the impugned Notification dated 28.05.2013 may graciously be set aside to the extent of Respondent No.4 and Respondents be directed to consider appellant for promotion to the post of Senior T.T. (BPS-16) w.e.f. 28.05.2013 with all consequential back benefits.

26.03.2015

Counsel for the appellant, Addl: A.G for official respondents No. 1 to 3 and private respondent No. 4 in person present. Learned counsel for the appellant submitted application for withdrawal of appeal with permission to file fresh one as grievances of the appellant are partially redressed.

The appeal is dismissed as withdrawn with permission to file fresh appeal, if so advised. File be consigned to the record. *W*

Sd/-
Chairman

ANNOUNCED
26.3.2015

Certified to be true copy
W
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Copy 27.3.2015
Number of Pages 800
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Total 8-0
Date of Completion of Copy 27.3.2015
Date of Delivery of Copy 27.3.2015

Annex J

46

میت صاحب سیکرٹری ایجوکیشن (سینئر ڈیپارٹمنٹ ایجوکیشن) حیدرآباد
غیران درخواستیہ مبارک حکیمانہ ذیل

ایش سے کہ بندہ فیکلٹی ایجوکیشن ضلع مردان میں T.T. ٹیوشن سیکل (15)

26 سے تعذبات سے اور وفان المدارس ملتان سے استفادہ العالیہ کاسٹریڈ میں
سائل BA کی ڈگری بھی لکھتا ہے جسکی تعویذ ایل حوزا کے ساتھ ملتا ہے

ایل کے عالیہ کاسٹریڈ ایجوکیشن ضلع مردان ایجوکیشن سیکل کے لیے لکھا گیا تھا
تعذباتی بندہ وفان المدارس سے متعلق پورے ڈگری 15-31-12

12-12-18 کو موصول ہوا ہے
ذیلی DPC مورخ 21/02/18 کو ہوئی۔ دوسری DPC مورخ 28 دسمبر 18
میں ضلع مردان کے تین T.T. ایجوکیشن سیکل کے لیے ترقی دی گئی۔

میں زوار حسین سیکل کے لیے ترقی مانی جسکا سٹیٹس 12/12/18 کا ہے۔
98 تھا لیکن سائل کو ترقی نہیں ملی۔ اس کے بعد فائل میں زوار حسین کے خلاف عدالت

اس کے بعد فائل میں زوار حسین کے خلاف عدالت
14/2 جمع کر دی گئی ہے جو کہ تاحال زیر بحث ہے

18- دسمبر 18 کو ہوئی
دوسری DPC مورخ 28 دسمبر 18 کو ہوئی

اب ضلع دہلی میں سے ایجوکیشن سیکل کے لیے ترقی دی گئی۔
DPC میں سائل کو ترقی سیکل کے لیے ترقی دی گئی۔ اس کے لیے تعذبات دیے گئے۔

الغرض مورخ
عبدالرحمن GHSSIT اکرام پور، مردان

No 86 dt 11-11-18

Forwarded to DEO (M)
Ed & Education Mandan
for n/a pl.

Attested to be
True
J

A.P. Khan

Date: 18/12/2012

مرکزی دفتر: گارڈن ٹاؤن، شیر شاہ روڈ ملتان

Amex "K"

47

عمری جناب ایڈیٹورز سنٹرل آفیسر
اسٹیمٹری اینڈ سیکنڈری ایجوکیشن مردان



السلام علیکم ورحمۃ اللہ وبرکاتہ

جناب کی طرف سے تمید الرحمن بن محمد زاہد خلیف مردان تاریخ پیدائش: 1974ء کی سند
عالمیہ کی فونو کاپی بحوالہ مکتوب نمبر 1790 مورخہ 2012-12-01 بتاتے تصدیق موصول ہوئی ہو کہ ہمارے ریکارڈ سے
مطابق درست ہے۔

اطلاع تحریر سے

والسلام

ناظم مرکزی دفتر

دفاع السرازمی العربیہ پاکستان



Handwritten signature

السلام علیکم ورحمۃ اللہ وبرکاتہ

نواز خان

18/12/12

ATTESTED

Attested to be

12305
18/12/12

APP: 256/15

WAKALAT NAMA

IN THE COURT OF KPK Service Tribunal

Hamid-ur-Rahman

Appellant(s)/Petitioner(s)

VERSUS

The Govt of KPK

and others

Respondent(s)

I/We Appellant do hereby appoint Mr. Khaled Rehman, Advocate in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

Khaled Rehman,
Advocate, Peshawar.

[Signature]
Signature of Executants

M. Ghazwan Ali

[Signature]

"B"

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

No.

256

Appeal No. of 20/5

Hameed-ur-Rahman Appellant/Petitioner

Versus

Secy: (E+SE) KPK Respondent

Respondent No. 1

Notice to: -

Govt of KPK through Secy: (E+SE)

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 31-7-2015 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 2

Day of 6 20/5

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

S.B.

No.

Appeal No. 256 of 2015
Hameed-ur-Rahman Appellant/Petitioner
 Versus
Secy. (E+SE) KPK Respondent
 Respondent No. 2

Notice to: - Director (E+SE) KPK

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 3-7-2015 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforesaid, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 2
 Day of 6 2015.


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

1076

"B"

Regd

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

S.B

No.

Appeal No. *256* of 20 *15*

Harveed vs Rehman Appellant/Petitioner

Versus

Sery (F&SE) KPK Respondent

Respondent No. *3*

Notice to:

— *D.E.O (Male), Mardan.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *31-7-2015* at *8.00 A.M.* If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this *2*.....

Day of *6*.....20 *15*

[Signature]
Registrar

**Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

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

73

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 256/ 2015

Hameed Ur Rehman Senior Theology Teacher GHS Ikram Pur District Mardan ... Appellant

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others. Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS 1-3.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

1. That the Appellant has got no cause of action / locus standi.
2. That the instant Service Appeal is badly time barred.
3. That the Appellant has concealed material facts from this Honorable Tribunal, hence liable to be dismissed on this score.
4. That the Appellant has filed the instant appeal on malafide motives.
5. That the Appellant has not come to this Honorable Tribunal with clean hands.
6. That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
7. That the instant Service Appeal is against the prevailing law & rules.
8. That the instant appeal is based on malafide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
9. That this Honorable Tribunal has got no jurisdiction to adjudicate upon the present service appeal.
10. That the Appeal is not maintainable in its present form & circumstances of the case.
11. That the Appeal is bad for mis-joinder & non-joinder of the necessary parties.
12. That the Notifications dated 18-4-2014 is legally competent & is liable to be maintained in favour of the Respondents.
13. That no Departmental Appeal has been filed by the Appellant, hence liable to be dismissed at this score too.

ON FACTS

1. That Para-I needs no comments being pertains to the service & academic record of the appellant.

- 2 That Para-2 is correct to the extent that the Govt: of Khyber Pakhtunkhwa, has promoted /upgraded the post TT to STT in BPS-16 on the basis of seniority of 1/3rd of the total strength with at least 05-years qualifying service with at least BA/ B. Sc in 2nd Division from duly recognized University of the Country, alongwith the additional qualification of Shahadatul Alia from recognized by the Wafaqul Madaras Pakistan for the grant of promotion / upgradation against the STT (post) in the light of the policy issued vide Notification dated 13-11-2012 (copy of the said Notification is attached as Annexure-A).
- 3 That Para-3 is incorrect & misleading on the grounds that the appellant has been treated as per above referred upgradation policy. He has been promoted vide Notification dated 08-8-2014 issued by the Respondent No: 2 in favour of the appellant against the STT (M) post in BPS-16 with immediate effect & the interest of public service by the Respondents.

Furthermore, so far as the promotion of Zawar Hussain STT(M) is concerned, he is senior to the appellant on the basis of his date of birth. The date of birth the appellant has recorded in the said seniority as 07-2-1974, with the qualification of BA as against the academic qualification of MA is required for the promotion against the ✓ STT(M) in BPS-16. Whereas the date of birth of Mr. Zawar Hussain STT(M) is 14-4-1972. Therefore, the impugned Notification dated 08-5-2013 & 08-08-2014 are in accordance with law, rules & upgradation policy, hence is liable to be maintained.

- 4 That Para-4 is incorrect & denied. No departmental appeal has been filed by the appellant nor any such record is available in the office of the Respondent No: 2. Whereas rest of the Para regarding dismissal of his Service Appeal No: 1487/2013 vide order dated 26-3-2015 is correct to the extent that the appellant has been promoted to STT(M) BPS-16 post vide the impugned Notification dated 08-8-2014 by the Respondent No: 2 against which no Departmental Appeal has been filed by the appellant. Hence the matter had been seen badly time barred by law & is liable to be struck down in favour of the Respondents in the interest of justice.
- 5 That Para-5 is legal. However the Respondents further submit on the following grounds inter alia :-

GROUNDS

- A Incorrect & denied. The appellant has been treated as per law, rules & cited policy dated 13-11-2012 by the Respondents in the instant case. Therefore, no violation of the said Article has been committed by the Respondent Department with regard to the Notification dated 18-4-2014 issued by the Respondent No: 2. Which is liable to be maintained in favour of the Respondents in the interest of justice.
- B Incorrect & denied. The act of the Respondents with regard to the impugned Notification dated 18-4-2014 vide which he appellant has been upgraded against the Senior Theology Teacher post with immediate effect is legally competent and liable to be maintained in favour of the Respondent Department.
- C Needs no comments being pertains to the service record of the appellant.
- D Incorrect & denied. The statement of the appellant is baseless ad without any merit, hence is liable to be struck down in favour of the Respondents.
- E Legal. However, the Respondents seek leave of this Honorable Tribunal to submit additional case law & record at the time of arguments.

43/18



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail raj.q_kk851@yahoo.com

Annex "H"

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts:-

Total No. of TT (M) Posts duly verified by the DAO	202
1/3 share of Senior TT Posts	67
Share of promotion 100 %	67
Already Promoted to the post of Senior TT B-15	67
One TT B-16 Sharifullah retired from service.	01
Posts available for Promotion	01

S. No.	Sen No.	Name	Place of posting	Date of Birth	Remarks
1	05	Hameed ur Rahman	GMS Muti Banda	07/02/1974	Services placed at the disposal of DEO (M) Mardan for further posting.

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 his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

1447-53

Endst: N7. / File No.1/Promotion Senior TT B-16: Dated Peshawar the 18/04/2014.

Copy forwarded for information and necessary action to the:-

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

8/8/2014

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Attested to be True Copy H

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 61/2016

Hameed-ur-RehmanAppellant

Versus

The Secretary E&SE and others.....Respondents

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO REPLY FILED BY RESPONDENTS NO.1-3.**

Respectfully Sheweth,

Preliminary Objections:

Preliminary objections raised by answering respondents are erroneous and frivolous. Appellant has got a strong cause of action and for that matter locus standi to file the instant appeal. The estoppels cannot run against the law. All the proper and necessary parties have been arrayed as Respondents in the instant appeal being filed within time in its correct form and shape. No thing has been concealed from the Hon'ble Tribunal.

Facts:

1. Being not replied hence admitted.
2. Being not replied hence admitted.
3. Incorrect. As a matter of fact Mr. Zawar Hussain was at Serial No.124 of the Seniority List while the appellant dwelt at Serial No.98 of the same Seniority List, therefore, appellant was entitled for promotion irrespective of the distinction in the dates of birth of both.

4. Incorrect. Proper departmental appeal was moved as per Diary No.86 dated 11.11.2014.
5. Being not replied hence admitted.

Grounds:

- A. Incorrect. The appellant was not treated according to law. Though the appellant was compensated after the illegality was challenged before the Tribunal but the promotion was granted with immediate effect instead of the due date for which appellant was not responsible.
- B. Incorrect. As explained hereinabove.
- C. Being not replied hence admitted.
- D. Incorrect. Since the mistake was committed by the Department, therefore, the appellant cannot be made to suffer on account of the lapse on the part of the Department.
- E. Needs no reply.

It is, therefore, humbly prayed that the reply of answering Respondents No.1-3 may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

Khaled Rahman
Advocate, Peshawar

Dated: 4/3 /06/2016

Verification

Verified that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Appellant

BEFORE THE WORTHY CHAIRMAN, KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 256 /2015

Hameed-ur-Rahman.....Applicant/Appellant

Versus

The Govt of KPK & others.....Respondents

**Application for Substitution of the word "up gradation" with
the word "promotion" in the memo of appeal.**

Respectfully Sheweth,

1. That the titled appeal is pending before this Hon'ble Tribunal which is fixed for today.
2. That at the time of drafting the appeal inadvertently instead of promotion the word up gradation has written which obviously is a clerical mistake needing correction.
3. That the correction is mentioned above as in the interests of justice and moreover, the same would not bring any minor or substantial change in the cause of action.

It is therefore humbly prayed, that on acceptance of this application, that the correction as mentioned under above may graciously be allowed and the office is directed to substitute the word "up gradation" with the word "promotion" with red ink.

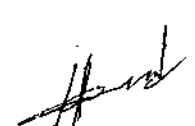
Through

Applicant/Appellant


Khaled Rehman,
Advocate, Peshawar.

Affidavit

I, Hameed-ur-Rahman, Senior Theology Teacher GHS Ikram Pur, Mardan, do hereby affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge.


Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

I - (32)

Service Appeal No. 1002/2013



Muhammad Shuaib,
Theology Theacher, Govt. High School,
Qutabgarh Takht Bhai Mardan.....Appellant.

Govt. of Peshawar
No. 1003
05-6-13

Versus

1. The Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Civil Secretariat Peshawar.
2. PThe Director, Elementary & Secondary Education Dabgari Garden Peshawar.
3. The District Education Officer, Elementary & Secondary Education, (Male) Mardan.....Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 21.02.2013 WHEREBY 64 TTS (MALE) WERE PROMOTED TO THE POSTS OF STTS WHILE APPELLANT AT SERIAL NO.64 WAS UNLAWFULLY IGNORED AGAINST WHICH APPELLANT FILED DEPARTMENTAL REPRESENTATION ON 04.03.2013 BUT THE SAME WAS NOT DISPOSED OFF WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:

On acceptance of the instant appeal, the impugned Notification dated 21.02.2013 may graciously be

Certified to be true copy

[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

ATTESTED

[Handwritten signature]
256/13

[Handwritten signature]
8/6/13

submitted to
filed:
[Handwritten signature]
21/6/13

33



Appeal No. 1002/2013, *Muhammad Shoaib vs Govt*

13.08.2018

Appellant Muhammad Shoaib in person along with
counsel Mr. Khalid Rehman, Advocate present. Mr. Hameed ur
Rehman, AD(Lit) alongwith Mr. Zia Ullah learned DDA for
respondents present.

The main contention of the appellant is that while issuing
the impugned notification by the respondents on 21.03.2013, 67
posts as per quota, were required to be promoted but instead, 64
were promoted and at that time, the appellant was standing at Sr.
no.144 whereas the last promotee was at Sr. no.142 and in case, all
the 67 posts would have been filled vis promoted, then the
appellant would have also been promoted but he was not
considered at that time. Later on, he was promoted on 01.08.2017
but with immediate effect. So his grievance is that he has been kept
deprived of the benefits available to him at the time of issuance of
the impugned notification. At this stage, learned Deputy District
Attorney raised preliminary objection on the jurisdiction of this
Tribunal by citing the judgment of august Supreme Court of
Pakistan reported in 2017 SCMR 890 and then the same followed
by this Tribunal in service appeal no. 984/15 titled Badshah Islam-
vs Chief Secretary Khyber Pakhtunkhwa decided on 11.10.2017.
However, learned counsel for the appellant was not agreed with the
objection raised by the DDA and still stressed to decide the case on
merit.

The upshot of the foregoing limited discussion is that, this
Tribunal is agree with the objection raised by the learned DDA, as
such, placing reliance on the verdict of the august Supreme Court
of Pakistan, this Tribunal lacks the jurisdiction to entertain the
appeal in hand, thus disposed off accordingly. However, the
appellant will be at liberty to approach the proper forum for
redressal of his grievances. In the circumstances, parties are left to
bear their own costs. File be consigned to the record room.

Announced:
13.08.2018

Sd/-
Member

Sd/-
Chairman

15-08-18
Number of
Copying Fee
Direct
Total
Date of delivery of copy
600
600
27-08-18
27-08-18

ATTACHED

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



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

Dated Peshawar, 11.07.2012

NOTIFICATION:

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

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

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


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

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

SECRETARY

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

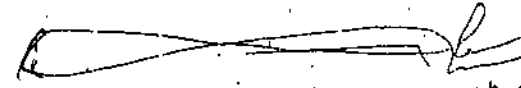
Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers


SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

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


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

Feroz Khan

"B"

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

*No. Regd.**DB*Appeal No.....*256*..... of *215**Hameed Ur Rehman*..... Appellant/Petitioner

Versus

The Govt. of KPK through Secy, (EG&SE) Civil Sect. Peshawar
RespondentRespondent No.....*(03)*.....

Notice to: *The district Education Officer (Male)*
District Mardan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *31.05.2022*.....at *8.00 A.M.* If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this *13th*.....

Day of.....*May*.....*20* .



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

“B”

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

DB/

Handwritten signature/initials

Appeal No. 225 of 12

Appellant: Mr. Rehman

Respondent:

The Govt. of K.P. through Dy. (Legal) Civil 2nd Respondent Peshawar

Respondent No. (02)

Notice to: The District Education Officer (Male)
District Mardan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration in the above case by the petitioner in this Court and notice has been ordered to issue, you are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 31-02-2022 at 8.00 A.M. If you wish to urge anything against the appeal/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorized representative or by any Advocate duly supported by your power of Attorney. You are therefore required to file in this Court at least seven days before the date of hearing 4 copies of a written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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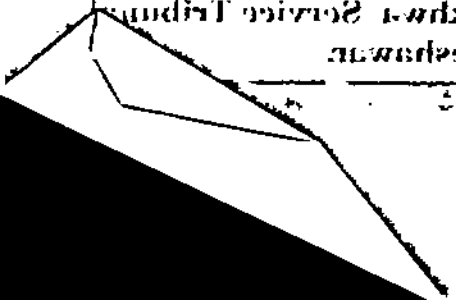
Copy of appeal has already been sent to you vide this

Office Notice No. dated

Given under my hand and the seal of this Court at Peshawar this 13th

Day of May

Registrar
Khyber Pakhtunkhwa Service Tribunal
Peshawar



"A"

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

No. *(Regd)*

APPEAL No. 256 of 2015

Hameed Ur Rehman

✓
Appellant/Petitioner

Versus

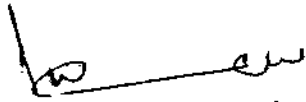
The Govt of KPK through Secy, E&SE civil secretariat Peshawar

RESPONDENT(S)

✓
Notice to Appellant/Petitioner Hameed Ur Rehman Senior theology
Teacher GHS Ikram Pur Mardan.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 31-05-2022 at 09:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 256 of 2015 .

Haneed Ur Rehman

Appellant/Petitioner

Versus

The Govt of KPK through Secy. (E&SE) civil secretariat Peshawar
RESPONDENT(S)

^{counsel}
Notice to Appellant/Petitioner Khaled Rehman

Advocate Peshawar. 3D Haroon Mansion
Khyber Bazar Peshawar. office tel 091-2592458
cell # 0345-9337312

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 31-05-2022 at 09:00 AM.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Noted for li & dt of
[Signature]

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

“B”

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

DB

No.

Appeal No. 256 of 20 15

Hameed Ur Rehman Appellant/Petitioner

Versus

The Govt of KPK through Secy, (E&SE) civil sectl Peshawar Respondent

Respondent No. (01)

Notice to:

The Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education civil secretariat, Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 31-05-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 13th.....

Day of May.....2022

[Signature]
SECRETARY DIARY

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

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

"B"

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

DB

No.

Appellant Name: Howard U. Roman
Appeal No: 526
Date of Appeal: 07/20/12

Respondent: The Govt of KPK through Secy, (E&E) Civil Cell
Respondent No: (01)

Notice for: The Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education Civil Secretariat, Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner on this Court and notice has been ordered to issue. You are hereby notified that the date of hearing is fixed for bearing before the Tribunal on 31-02-2012 at 10:00 A.M. If you wish to urge anything against the appeal/petition you are at liberty to do so on the date fixed, or any other day to which the date may be postponed either in person or by authorized representative only and Advocate, duly supported by your power of Attorney. You are directed to attend to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court at Peshawar this 13th day of May 2012

Registrar
Khyber Pakhtunkhwa Service Tribunal
Peshawar

SECRETARY DARY

"B"

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

No.

256
Appeal No. of 2015.
Hameed Ur Rehman Appellant/Petitioner

Versus
The Govt of KPK through Secy (EGSE) civil Sectl Peshawar Respondent

Respondent No. (02)

Notice to: The Director Elementary & Secondary Education
Khyber Pakhtunkhwa Dabgari Garden Peshawar.

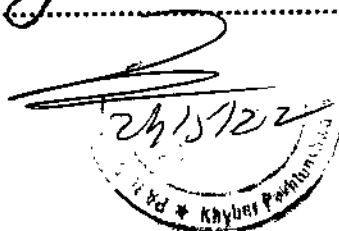
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition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

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

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

Given under my hand and the seal of this Court, at Peshawar this 13th

Day of May 2015



[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

