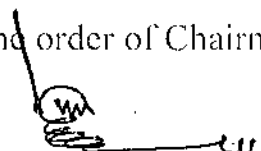


# FORM OF ORDER SHEET

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

Case No.- 289/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/02/2023	<p>The appeal of Mr. Ali Akbar resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>10-2-23</u>. Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

69  
The appeal of Mr. Ali Akbar SST GHS No.2 Sakhakot Dargai Malakand received today i.e. on 30.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures are unattested.
- 4- Affidavit is not attested by the Oath Commissioner.
- 5- Index has not been filed.
- 6- Memorandum of appeal be got signed by the appellant.
- 7- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 8- Annexures B & D are illegible which may be replaced by legible/better one.
- 9- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.
- 10- The documents that are to be provided must be illegible/visible.

No. 45 /S.T.

DL 5/1 /2023

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

R/sir,

Obj Nos 1, Attached

// 2, Flagged.

// 3, Attested.

// 4, Attested.

// 5, Filed.

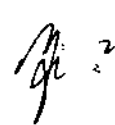
// 6, Signed.

// 7, In Attached.

// 8, Better copies attached.

// 9, Attached.

// 10, Visible.



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**

**PESHAWAR.**

SERVICE APPEAL NO. 289 /2023

Ali Akbar

VS

Education Dept H:

**APPLICATION FOR FIXATION OF THE ABOVE TITLED APPEAL AT**  
**PRINCIPAL SEAT, PESHAWAR**

Respectfully Sheweth:

1. That the above mentioned appeal is pending adjudication before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

**It is therefore prayed that on acceptance of this application the appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.**

Appellant/Applicant

Dated: 8/2/23

Through

  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

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

SERVICE APPEAL No. 289 /2022

**ALI AKBAR VS EDUCATION DEPTT:**

**I N D E X**

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal with Affidavit	.....	1 - 3
2.	Appointment Order	A	4
3.	Copy of Notification dated 21.02.2013	B	5 - 7
4.	Notification dated 28-10-2014	C	8 - 11
5.	Impugned notification	D	12 - 14
6.	Departmental appeal	E	15
7.	Vakalatnama		16

Through: **APPELLANT**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE,**  
**SUPREME COURT OF PAKISTAN**

-1-

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

APPEAL NO. \_\_\_\_\_/2022

Khyber Pakhtunkhwa  
Service Tribunal

Mr. Ali Akbar SST (BPS-16) (Bio/Chem),  
GHS No.2 Sakhakot. Tehsil Dargai, District Malakand.

Case No. 2609

Dated 30/12/22

.....**APPELLANT**

**VERSUS**

- 1- The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer, District Malakand.
- 4- Muhammad Tahir SST (BPS-16) (Bio/Chem),  
GHS Dargi No.1. Tehsil Dargai, District Malakand
- 5- Muhammad Aghar (BPS-16) (Bio/Chem),  
GHS Dheri Aladand No.1. Tehsil Dargai, District Malakand.

.....**RESPONDENTS**

**SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 22.02.2019 WHEREBY THE APPELLANT HAS BEEN PROMOTED TO THE POST OF SST BPS-16 (BIO/CHEM) WITH IMMEDIATE EFFECT INSTEAD OF W.E.F 28.10.2014 WHEN COLLEAGUES AND JUNIORS OF THE APPELLANT WERE PROMOTED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the impugned notification dated 22.02.2019 may very kindly be modified/rectified to the extent of appellant and the respondents may kindly be directed to consider the appellant for promotion to the post of SST BPS-16 (Bio/Chem) w.e.f 28.10.2014, the date when colleagues and junior colleagues of the appellant were promoted to the post of SST BPS-16 (Bio/Chem) with all consequential back benefits including seniority. Any other remedy which this Honorable Tribunal deems appropriate may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

Brief facts giving raise to the instant appeal are as

under:

- 1- That appellant was initially appointed as CT (BPS-9) now BPS-15 vide order dated 07-10-1989 in the respondents department and is serving the respondents department with zeal and zest and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as Annexure .....A.
- 2- That through notification dated 21.02.2013 upon the proper recommendation of the Departmental Promotion Committee the appellant has been promoted to the post of SCT BPS-16 and started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of Notification dated 21.02.2013 is attached as Annexure .....B.
- 3- That the respondent department through notification dated 28.10.2014 promoted the Colleagues and Junior Colleagues of the appellant to the post of SST BPS-16 (Bio/Chem) but astonishingly the appellant was ignored despite the fact that the appellant also eligible for promotion to the post of SST BPS-16. Copy of notification 28.10.2014 is attached as Annexure .....C
- 4- That feeling aggrieved from the inaction of the respondent by not promoting the appellant time and again approached to the respondent department for his promotion to the post of SST BPS-16 (Bio/Chem) as per his colleagues and juniors but of no avail.
- 5- That it is important to mention here that respondent department through impugned notification dated 22.02.2019 promoted the appellant to the post of SST BPS-16 (Bio/Chem) with immediate effect instead of w.e.f 28.10.2014 when the colleagues and junior colleagues were promoted to the post of SST BPS-16 (Bio/Chem). Copy of the impugned notification is attached as Annexure .....D.
- 6- That the appellant feeling aggrieved from impugned notification dated 22.02.2019 preferred departmental appeal before the respondent but the same has not been decided within the stipulated period of ninety days. Copy of the departmental appeal is attached as Annexure .....E
- 7- That the appellant feeling aggrieved and having no other remedy filed the instance service appeal on following grounds inter alia.

**GROUNDS:**

- A- That the impugned notification dated 22.02.2019 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

- B- That appellant has not been treated by the respondents department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That despite the appellant was on promotion zone but the respondent ignored the appellant and promoted the colleague and junior to the appellant and lastly issued the impugned notification dated 22.02.2019 whereby appellant was promoted with immediate effect instead of w.e.f 28.10.2014.
- D- That the respondent department acted in arbitrary and malafide manner by not promoting the appellant to the post of SST BPS-16 (Bio/Chem) with effect from 28.10.2014.
- E- That the impugned notification dated 22.02.2019 is violative of section 9 of the Civil Servant Act read with rule 7 of the Appointment, Promotion and Transfer Rules 1989.
- F- That not considering the appellant for promotion to the post of SST BPS-16 (Bio/Chem) with effect from 28.10.2014, the respondents acted in discriminatory manner.
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 29/12/22

**APPELLANT**

**THROUGH:**

**NOOR MUHAMMAD KHATTAK**

**WALEED ADNAN**

**UMAR FAROOQ**

**MUHAMMAD AYUB  
ADVOCATES**

"A" -4-

OFFICE OF THE DIRECTOR OF EDUCATION (S) MALAKAND DIVISION SAIDU SHARIF, AT GUL KADA SWAT.

APPOINTMENT:

Mr. Ali Akbar S/O Sahib Shah resident of Village Kaper District Malakand Agency hereby temporarily appointed against CT Post at Gms Derge in BPS No. 9 G.S. 83 P.M. Fixed plus usual allowances as due and admissible to him/her under the rules with effect from the date of his/her taking over charge in the interest of public service subject to the following terms & conditions:-

TERMS & CONDITIONS:-

- 1- No T.A./D.A. is allowed.
- 2- Charge reports should be submitted to all concerned.
- 3- The appointment is made on purely temporarily basis and liable to termination at any time without notice and assigning any reason. In case of resignation he will submit one month's prior notice to the Department for forfeit one month's pay in lieu thereof if to the Gov.
- 4- The Candidate shall produce his/her health and age certificates from the Civil surgeon concerned in case he/she is not already in service.
- 5- The Heads of the Institutions are required to check the original academic professional certificates of the Candidate before handing over charge to him/her.
- 6- In Case the Candidate failed to take over charge within 15 days of the issue of this order, his/her appointment shall stand automatically cancelled.
- 7- The Candidate shall not be handed over charge if his/her age exceed 33 years or below 18 years.

Gulzar  
DIRECTOR OF EDUCATION,  
MALAKAND DIVISION  
AT GUL KADA SWAT.

Encl: No. 319/16-21

Dated 7/10 /1989.

Copy forwarded to:-

- 1- The Distt: Education Officer (M) Malakand Agency
- 2- The S.D.E.O. (M) Sam Ranjan
- 3- The Headmaster/Headmistress Gms Derge
- 4- The Candidate concerned.
- 5- The Adviser to Hon. Chief Minister, for Educ. NW.F.P. w/r to his order dated 28.8.89.
- 6- The Special Asstt. to the Hon. Chief Minister, NW.F.P. w/r to his order dated 28.8.89.

\*Tal. Mohammed/\*

for/ Mhar  
DIRECTOR OF EDUCATION,  
MALAKAND DIVISION  
AT GUL KADA SWAT.

A





"B"

-S-

**Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-19/P&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 CT's B-15 are hereby promoted to the post of Senior CT 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 CT BPS-16 posts:-

Total No. of CT (M) Posts duly verified by the DAO	373
1/3 share of Senior CT Posts	124
Share of promotion 100%	124
Promoted to the post of Senior CT B-16	123
Deferred for Promotion	01

S.N o.	S.L. No	Name	Place Of Posting	Date of Birth	Remarks
1	2	Ihsanullah Khan	GHS Dargai No.1	06/01/1954	Services placed at the disposal of DEO (M) Malakand for further posting.
2	3	Saidul Abrar	GHS Palat	03/08/1962	---Do---
3	4	Muhammad Qasim	GHS Totakan	28/02/1962	---Do---
4	5	Badshah Munir	GHS Wartair	01/07/1960	---Do---
5	6	Parhad Khan	GHS Hero Shah	01/07/1959	---Do---
6	7	Muhammad Younas	GHS Totakan	20/04/1961	---Do---
7	8	Munir Khan	GHS Agra	01/10/1959	---Do---
8	9	Saeed Ahmad	GHS Sakhakai No.1	02/01/1958	---Do---
9	10	Aslam Khan	GHS Qulangi	19/06/1955	---Do---
10	11	Gul Wazir	GHS Inzargai	03/05/1960	---Do---
11	12	Sarfaraz Khan	GHS Totai	15/07/1960	---Do---
12	13	Hikmat Shah	GHS Sakhakai No.1	25/02/1956	---Do---
13	15	Muhammad Wali	GHS Ghunda Bala	20/08/1959	---Do---
14	16	Muhammad Ali Khan	GHS Sakhakai No.1	12/12/1965	---Do---
15	17	Hamid Ullah	GHS Wartair	08/12/1956	---Do---
16	18	Rahim Ullah	GHS Totakan	05/05/1962	---Do---
17	19	Salih Muhammad	GHS Badragui	30/01/1954	---Do---
18	20	Samiullah Khan	GHS Dargai No.2	04/01/1959	---Do---
19	21	Ahmad Wahid	GHS Thana No.1	01/01/1965	---Do---
20	22	Musa Khan	GHS Sakhakai No.1	02/02/1955	---Do---

KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

Consequent upon the recommendations of the Departmental Elementary Committee and in pursuance of the Government of Khyber Pakhtunkhwa 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs. 10000-800-3400) 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 CT BPS-16 Posts:-

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3.	4	Muhammad Qasim	GHS Totakun	28.02.1962	--Do--
4.	5	Badashah Munir	GHS Wartair	01.07.1960	--Do--
5.	6	Farhad Khan	GHS Hero Shah	01.07.1959	--Do--
6.	7	Muhammad Younas	GHS Totakan	20.04.1961	--Do--
7.	8	Munir Khan	GHS Agra	01.10.1959	--Do--
8.	9	Saeed Ahmad	GHS Sakhakot No 1	02.01.1958	--Do--
9.	10	Aslam Khan	GHS Qulangi	19.06.1955	--Do--
10.	11	Gul Wazir	GHS Inzargai	03.05.1960	--Do--
11.	12	Sarfaraz Khan	GHS Totai	15.07.1960	--Do--
12.	13	Hikmat Shah	GHS Sakhakot NO 1	25.02.1956	--Do--
13.	15	Muhammad Wali	GMS Ghundo Bala	20.08.1959	--Do--
14.	16	Muhammad Ali Khan	GHS Sakhakot No 1	12.12.1965	--Do--
15.	17	Harnid Ullah	GHS Wartair	08.12.1956	--Do--
16.	18	Rahim ullah	GHS Totakan	05.05.1962	--Do--
17.	19	Salih Muhammad	GHS Badragga	30.01.1954	--Do--
18.	20	Samiullah Khan	GHS Dargai No 2	04.01.1959	--Do--
19.	21	Abdul Wahid	GHS Thana No 1	01.01.1965	--Do--
20.	22	Musa Khan	GHS Sukhakot No 1	2.02.1962	--Do--

67	69	Muhammad Akbar	GHS Pir Khel	01/01/1963	---Do---
68	70	Latifur Rahman	GHS Garhi Usmani Khel	20/01/1963	---Do---
69	71	Badshah Khan	GHS Patni	01/03/1962	---Do---
70	72	Muhammad Azam Khan	GHS Sakhatkot No.2	20/02/1965	---Do---
71	73	Iftikhar Ahmad	GHS Batkhela No.2	01/09/1960	---Do---
72	74	Muhammad Saleem	GMS Patuda Kanjharo	01/01/1959	---Do---
73	75	Muhammad Qayim	GHS Inzargai	09/01/1965	---Do---
74	76	Salim Ahmad	GMS Ghinda Bala	20/03/1958	---Do---
75	78	Amir Ghazan	GHS Dargai No.1	31/03/1967	---Do---
76	79	Sher Bahadar	GMS Ghauri Kullay	09/01/1961	---Do---
77	80	Usman Ali	GMS Dawa Khan Kili	04/03/1959	---Do---
78	81	Muhammad Alam	GHS Kot	01/01/1959	---Do---
79	82	Saleem Khan	GHS Sakhatkot No.1	06/03/1961	---Do---
80	83	Farooq Shah	GHS Sakhatkot No.1	03/08/1959	---Do---
81	84	Jawaid Ul Haq	GHS Sakhatkot No.1	28/03/1967	---Do---
82	85	Haq Nawaz	GHS Sakhatkot No.1	15/01/1954	---Do---
83	86	Hussain Shah	GHS Kharki Dhari	21/05/1953	---Do---
84	87	Amir Nawab	GHS Hudrugga	04/01/1961	---Do---
85	88	Noor Ul Wahab	GHS Garhi Usmani Khel	22/06/1963	---Do---
86	89	Muhammad Ayaz	GHS Hudrugga	03/02/1967	---Do---
87	90	Fazli Aleem	GHS Thana No.1	02/09/1971	---Do---
88	91	Mian Ghafoor	GHS Sakhatkot No.2	06/01/1968	---Do---
89	92	Ihsan Ul Haq	GHS Sakhatkot No.1	03/01/1970	---Do---
90	93	Wahab Gul	GHS Kot	04/03/1971	---Do---
91	94	Jamal	Gems Batkhela	02/01/1965	---Do---
92	95	Bakht Zamin	Gems Batkhela	18/01/1970	---Do---
93	96	Muhammad Dawood	GHS Kot (Central)	12/10/1968	---Do---
94	97	Sher Bahadar	GHS Gul Murqat	04/08/1967	---Do---
95	98	Bakht Sultan	GHS Totai	07/02/1968	---Do---
96	99	Asfandyar	GHS Thana No.1	10/01/1967	---Do---
97	100	Muhammad Riaz	Gems Batkhela	03/12/1966	---Do---
98	101	Rahim Dad Khan	GMS Naray Tangay	01/01/1959	---Do---
99	102	Ibrahim Ullah	Gems Batkhela	04/01/1961	---Do---
100	103	Satta Ur Rehman	GMS Akbar Abad	17/04/1961	---Do---
101	104	Said Akbar	GHS Akhband	02/02/1961	---Do---
102	105	Rahmat Ullah	GMS Akbar Abad	03/10/1964	---Do---
103	106	Zakir Khan	GHS Sakhatkot No.1	10/01/1960	---Do---
104	107	Muhammad Tahir	GHS Dargai No.1	06/01/1964	---Do---
105	108	Said Muhammad	GHS Kot	01/12/1965	---Do---
106	109	Muhammad Asghar	GHS Dhari Aladand No.1	03/03/1965	---Do---
107	110	Zakirullah	GHS Ca Thana	13/04/1967	---Do---
108	112	Kamul Islam	GHS Thana No.1	27/05/1962	---Do---
109	113	Zahir Shah	GHS Wartair	03/01/1962	---Do---
110	114	Fazal Karim	GHS Thana	05/01/1960	---Do---
111	115	Ihsan Ullah Khan	GHS Pat	04/01/1972	---Do---
112	116	Lutfullah	GHS Kot	05/08/1970	---Do---

LEGIBLE COPY

67.	69	Muhammad Akbar	GHS Pir Khel	04.01.1963	--do--
68.	70	Lutfur Rahman	GHS Garhi Usmani Khel	20.04.1965	--do--
69.	71	Badshah Khan	GHS Palai	01.03.1962	--do--
70.	72	Muhammad Azam Khan	GHS Sakhakot No 2	20.02.1965	--do--
71.	73	Iftikhar Ahmad	GHS Batkhela No 2	01.09.1960	--do--
72.	74	Muhammad Saleem	GMS Painsda Kandaro	01.01.1959	--do--
73.	75	Muhammad Qayyum	GHS Inzargai	09.01.1956	--do--
74.	76	Salim Ahmad	GMS Ghundo Bala	20.03.1958	--do--
75.	78	Amir Ghazan	GHS Dargai No 1	31.03.1967	--do--
76.	79	Sher Bahadar	GMS Ghawar Kalay	09.01.1961	--do--
77.	80	Usman Ali	GMS Dawa Khan Kili	04.03.1959	--do--
78.	81	Muhammad Alam	GHSS Kot	04.01.1959	--do--
79.	82	Saleem Khan	GHS Sakhakot No 1	06.03.1961	--do--
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81.	84	Javaid ul Haq	GHS Sakhakot No 1	28.03.1967	--do--
82.	85	Hag Nawaz	GHS Sakhakot No 1	15.01.1954	--do--
83.	86	Hussain Shah	GHS Kharaki Dheri	21.05.1953	--do--
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85.	88	Noor ul Wahab	GHS Garhi Usmani Khel	22.06.1963	--do--
86.	89	Muhammad Ayaz	GHS Badragga	03.02.1967	--do--
87.	90	Fazli Aleem	GHS Thana No 1	02.09.1971	--do--
88.	91	Mian Ghafoor	GHS Sakhakot No 2	06.03.1968	--do--
89.	92	Ihsan ul Haq	GHS Sakhakot No 1	03.01.1970	--do--
90.	93	Wahab Gul	GHSS Kot	04.03.1971	--do--
91.	94	Jamal	GMHS batkhela	02.01.1965	--do--
92.	95	Bakht Zamin	GHSS Kot (Central)	18.01.1970	--do--
93.	96	Muhammad Dawood	GHS Gul Muqam	12.10.1968	--do--
94.	97	Sher Bahadar	GHS Total	04.08.1967	--do--
95.	98	Bakht Sultan	GHS Thana No 1	07.02.1968	--do--
96.	99	Asfandyar	Gems Batkhela	10.01.1967	--do--
97.	100	Muhammad Riaz	GMS Naray Tangay	03.12.1966	--do--
98.	101	Rahim Dad Khan	Gems batkehla	01.01.1959	--do--
99.	102	Ikram ullah	GMS Akbar Abad	04.01.1961	--do--
100.	103	S Atta ur rehman	GHS Mekhband	17.04.1961	--do--
101.	104	Said Akbar	GMS Akbar Abad	02.02.1961	--do--
102.	105	Rahmat Ullah	GHS Sakhakot No 1	03.10.1964	--do--
103.	106	Ali Akbar	GHS Dargai No 1	10.01.1964	--do--
104.	107	Muhammad Tahir	GHSS Kot	06.01.1964	--do--
105.	108	Said Mehmood	GHS Dheri Aladand No 1	04.12.1965	--do--
106.	109	Muhammad Asghar	GHS Ce Thana	03.03.1965	--do--
107.	111	Zakaullah	GHS Thana No 2	13.04.1967	--do--
108.	112	Noorul Islam	GHS Wartair	27.03.1962	--do--
109.	113	Zahir Shah	GHS Tatakter	03.01.1969	--do--
110.	114	Fazal Karim	GHS Nal	08.12.1969	--do--
111.	115	Ihsan Ullah Khan	GHSS Kot	04.04.1973	--do--
112.	116	Lutfullah	GHSS Kot	05.08.1970	--do--

113	117	Zakir Hussain	GHS Dheri Alandi No.1	15/04/1962	---Do---
114	118	Muhammad Rashid	GHS Dheri Julagram	02/06/1972	---Do---
115	119	Zakir Hussain	GHS Palai	15/02/1968	---Do---
116	120	Sajjad Ahmad	GHS Dheri Julagram	02/04/1968	---Do---
117	121	Arsala Khan	GHS Thana No.1	15/04/1971	---Do---
118	122	Syed Ammar Shah	GHS Saklakat No.1	15/04/1959	---Do---
119	123	Jehangraz Khan	GHS Khar	10/04/1960	---Do---
120	124	Muhammad Riaz	GHS Thana No.1	03/02/1968	---Do---
121	125	Sher Ghani	GHS Kopar	04/06/1955	---Do---
122	126	Aurang Zeb	GHS Thana No.1	18/01/1962	---Do---
123	127	Fazli Hadi	GHS Kaimi Agra	18/03/1960	---Do---

7

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.

4586-92

Enclat: No. / File No. / Promotion Senior UPH-16: Dated Peshawar the 21/02/2013.

Copy forwarded for information and necessary action to the:

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

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

21/2/2013

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113.	117	Zakir Hussain	GHS Dher Aladand No 1	15.04.192	-Do-
114.	118	Muhammad Rashid	GHSS Dheri Julagram	02.06.1972	-Do-
115.	119	Zakir Hussain	GHS Palai	15.02.1968	-Do-
116.	120	Sajjad Ahmad	GHSS Dheri Hulagram	02.04.1968	-Do-
117.	121	Arsala Khan	GHS Thana No 1	16.04.1971	-Do-
118.	122	Syed Anwar Shah	GHS Sakhakot No 1	15.04.1959	-Do-
119.	123	Jehangraz Khan	GHSS Khar	10.04.1960	-Do-
120.	124	Muhammad Riaz	GHS Thana No 1	03.02.1968	-Do-
121.	125	Sher Ghazai	GHS Kopar	04.06.1955	-Do-
122.	126	Aurangzeb	GHS Thana No 1	18.01.1962	-Do-
123.	127	Fazli hadi	GMS Kama Agra	18.03.1960	-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-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 reversed.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa, Peshawar.

Endst No 4586-922/File No 2/Promotion Senior CT B-16 Dated Peshawar the 21.02.2013

Copy forwarded for information and necessary action to the:

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

Dy: Director (Estab)

Elementary and Secondary Education  
Khyber Pakhtunkhwa, Peshawar.



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

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-31857  
E-mail rafiq\_kk851@yahoo.com

"C"  
-8-

**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(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/ITs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each 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 by the District Education Officer concerned on "School based".

**A. SST (Bio-Chem)**

**1. PROMOTION OF SCT/CT TO THE POST OF SST (BIO-Chem) BPS-16**

Total No. of SST Bio-Chem (M) Posts vacant Posts	17
25% share initial recruitment	04
75% share for Promotion.	13
40 % Share of promotion of SCT/CT	07
Posts available for promotion	07
Promoted through this order	07

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	93	Ihsan Ul Haq	GHS Sakhakot No.1	1-Mar-70	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post on school based.
2	94	Jamal	GCMHS Batkhela	1-Feb-65	-----do-----
3	107	Muhammad Tahir	GHS Dargai No.1	1-Jun-64	-----do-----
4	109	Muhammad Asghar	GHS Dheri Aladand No.1	3-Mar-65	-----do-----
5	111	Shaban Muhammad	GHS Gochi Hsmani Khel	11-Mar-61	-----do-----
6	182	Umar Baz	GHS Sakhakot No.2	12-Jun-67	-----do-----
7	211	Qayum Shah	GHS Sakhakot No.1	10-Mar-70	-----do-----

**2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (BIO-Chem) BPS-16**

Total No. of SST Bio-Chem (M) Posts vacant Posts	17
25% share initial recruitment	04
75% share for Promotion.	13
20 % Share of promotion of PSHT/SPST/PST	03
Posts available for promotion	03
Promoted through this order	03

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	111	Hassan Idrees	GPS Jharei	07/04/1971	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post on school based.

SSTs (M) Malakand 2

412	Hussain Idrees	GHS Sakhakot No. 2	07/04/1971	
413	Noor Muhammad	GHS Gul Muqam	20/12/1969	

3. PROMOTION OF SDM/DM TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	17
25% share initial recruitment	04
75% share for Promotion.	13
4 % Share of promotion of SDM/DM	01
Posts available for promotion	01
Promoted through this order	01

S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
51	Muhammad Latif	GHS No.1 Dheri Allahdand	5-Mar-73	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post on school based.

B. SST (Phy-Maths)

1. PROMOTION OF SCT/CT TO THE POST OF SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
40 % Share of promotion of SCT/CT	03
Posts available for promotion	03
Promoted through this order	03

S. No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	80	Muhammad Ayoob	GHS Badragga	2/03/1967	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Phy-Maths) post on school based.
2	95	Bakht Zaman	GHS Bakheh	18/01/1970	-----do-----
3	97	Sher Bahadar	GHS Gul Muqam	8/04/1967	-----do-----

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (Phy-Maths) BPS-16.

Total No. of SST Phy-Maths (M) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
20 % Share of promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Promoted through this order	02

S. No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	484	Zahid Hussain	GPS Palai Khpa	9/1/1967	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Phy-Maths) post on school based.
2	485	Bakht Rawan	GPS No.1 Sakhakot	5/1/1968	-----do-----



3. PROMOTION OF SDM/DM TO THE POST OF SST (Phy-Maths BPS-16) -10-

Total No. of SST Phy-Maths (M) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
4 % Share of promotion of SDM/DM	01
Posts available for promotion	01
Promoted through this order	01

S. No	S.L.N	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	57	Ghulam Hassan	GMS Shingrai	05/02/1972	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Phy-Maths) post on school based.

C. SST (General)1. PROMOTION OF SCT/CT TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	06
25% share initial recruitment	02
75% share for Promotion.	04
40 % Share of promotion of SCT/CT	02
Posts available for promotion	02
Promoted through this order	02

S.N	S.L.N	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	6	Farhad Khan	GHS Hero Shah	07/01/1959	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post on school based.
2	7	Muhammad Younas	GHS Totakan	20/04/1961-	-----do-----

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	6
25% share initial recruitment	2
75% share for Promotion.	4
20 % Share of promotion of PSHT/SPST/PST	1
Posts available for promotion	1
Promoted through this order	1

S.N	S.L.N	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	104	Noshad Khan	GPS Zormandi	6/3/1967	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post on school based.

Terms and conditions:-

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

- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based, They will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

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

2326-90  
Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 28/10/2014.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned.
3. District Accounts Officer concerned
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

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

"D" -12-



Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

SSTs (M) Malakand

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**Notification**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(PE)/4-5/SSRC/Meeting/2019/Teaching Cadre dated 24<sup>th</sup> July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) -noted against each BPS-16 (Rs. 18910-1520-64510) 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 by the District Education Officer concerned.

**A. SST (Bio/Chem)**

**1. Promotion to Senior CT/CT to SST (Bio/Chem) BPS-16**

Total No. of vacant Posts of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion.	05
20% Share of promotion of SCT/CT	03
Posts available for promotion	03
Proposed for Promotion	01
Recommended for promotion	01
Balance	02

S.I.	Name of Official & Present Place	Date of Birth	Date of Appoint as Regular CT	Qualification	Remarks
1	M. Akbar Khan JHS, Sakaka	11/10/1964	10/10/1989	MS/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post.

**2. Promotion of PSHT/SPST/PST to SST (Bio/Chem) BPS-16**

Total No. of vacant Posts of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion.	05
20% Share of promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S.I. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1	Umra Khan GPS Shavo Kalay	19/1/1976	11/1/2004	BS/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post.
2	Javed Iqbal GPS No.2 Dargal	12/1/1980	18/7/2011	BS/B.Ed	do

**B. SST (Phy-Maths)**

**1. PROMOTION OF SCT/CT TO SST (Phy-Maths) BPS-16**

Total No. of SST Phy-Maths (M) Posts vacant Posts	09
25% share initial recruitment	02
75% share for Promotion.	07
20% Share of promotion of SCT/CT	04
Posts available for promotion	04
Proposed for Promotion	02

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION**  
**Khyber Pakhtunkhwa Peshawar**

**NOTIFICATION**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qars, PSHTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules and regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect and further they will be posted by the District Education Officer concerned.

**A. SST (BIO/CHEM)**

**1. PROMOTION TO CT/CT to SST (BIO-CHEM) BPS-16**

Total No of vacant pots of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion	05
40% share of Promotion of SCT/CT	03
Posts available for promotion	03
Proposed for promotion	01
Recommended for promotion	01
Proposed for promotion	02

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1		Ali Akbar Khan GHSS Sakhakot	01.10.1964	10.10.1989	MSc/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (BioChem) Post

**2. PROMOTION OF PSHT/SPST/PST TO SST (BIO-CHEM) BPS-16**

Total No of vacant pots of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion	05
20% share of Promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Prepared for promotion	02
Recommended for promotion	02

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1	503	Umaira Khan GPS Shawa Kalay	19.01.1976	11.11.2004	B.Sc/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (BioChem) Post
2	673	Javed Iqbal GPS No 2	12.01.1980	17.07.2011	B.Sc/B.Ed	---Do---

**B. SST (PHY-MATHS)**

**1. PROMOTION OF SCT/CT TO SST (PHY-MATHS) BPS-16**

Total No of vacant pots of SST Phy-Maths (M) Posts vacant Posts	09
25% share initial recruitment	02
75% share for Promotion	07
40% share of Promotion of SCT/CT	04
Posts available for promotion	04
Proposed for promotion	02

13-

SSTs (M) Malakand 3

17	Mum Ghaffar D.S. Tahkuli	6/1/1968	27/4/1992	MA/M.Ed	do
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PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
20% Share of promotion of PSHT/SPST/PST	05
Posts available for promotion	05
Proposed for Promotion	05
Recommended for promotion	05

S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular PST	Qualificati on	Remarks
18	Amir Zaman GPS Faisal Abul (Tahkuli)	4/3/1960	4/11/1979	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.
19	Muliamyad Irfan GPS Kahwal (Agro)	5/3/1964	10/10/1982	BA/B.Ed	do
20	Zahoor Ahmad GPS No.2 Dargal	13/4/1968	1/11/1987	BA/B.Ed	do
21	Shaukat Ali GPS Ghaur Kahwal	10/4/1969	1/11/1987	BA/B.Ed	do
22	Muhammad Kahwal	10/9/1966	11/3/1983	BA/B.Ed	do

PROMOTION OF SDM/DM TO SST (General) BPS-16.

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
0% Share of promotion of SDM/DM	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular DM	Qualificati on	Remarks
23	Irfan Ullah GIS Badragga	30/3/1964	1/12/1988	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.

PROMOTION OF SAT/AT TO SST (General) BPS-16.

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
0% Share of promotion of SAT/AT	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular AT	Qualificati on	Remarks
24	Sarbiland Khan	12/7/1972	14/3/1992	MA/B.Ed	Services placed at the disposal of

**LEGIBLE COPY**

SSTS(M) Malakand						
S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1		Mian Ghafoor GHS Sakhakot	06.03.1968	27.04.1992	MA/M.Ed	--do--

**2. PROMOTION OF PSHT/SPST/PST to SST (General) BPS-16**

Total No of vacant pots of SST General	24
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25% share initial recruitment	06
75% share for Promotion	18
20 % share of Promotion of PSHT.SPST/PST	05
Posts available for promotion	05
Proposed for promotion	05
Recommended for promotion	05

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1		Amir Zaman GPS Faisal Abad (Totakan)	04.03.1960	04.11.1979	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) Post
2		Muhammad Idrees GPS Karwai (Agra)	05.03.1964	10.10.1982	BA/B.Ed	---Do---
3	08	Zahoor Ahmad GPS No 2 Dargai	13.04.1968	01.11.1987	BA/B.Ed	--Do--
4	102	Shauat Ali GOS Ghawar Kalay	10.04.1969	1.11.1987	BA. B.Ed	--Do--
5		Gul	10.09.1966	11.03.1985	BA / B.Ed	--Do--

**3. PROMOTION OF SDM/DM TO SST (GENERAL) BPS-16**

Total No of vacant pots of SST (General)	24
25% share initial recruitment	06
75% share for Promotion	18
04% share of Promotion of SDM/DM	01
Posts available for promotion	01
Proposed for promotion	01
Recommended for promotion	01

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1		Irfan ullah GHS Badragga	30.03.1964	01.12.1988	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) Post

**4. PROMOTION OF SAT/AT TO SST (GENERAL) BPS-16**

Total No of vacant pots of SST (General)	24
25% share initial recruitment	06
75% share for Promotion	18
40% share of Promotion of SCT/CT	01
Posts available for promotion	01
Proposed for promotion	01
Recommended for promotion	01

S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
1	8	Sarbiland Khan	12.07.1972	14.05.1992	MA/B.Ed	Services placed at the disposal of

-14-

SSTs (M) Malakand 4

GHS Haryan Kor				DEO (M) Malakand for further posting against SST (General) post.
Promotion of STI/TT to SST (General) BPS-16				24
Total No. of vacant Posts SST (General)				06
25% share initial recruitment				18
25% share for Promotion.				01
04 % Share of promotion of STI/TT				01
Posts available for promotion				01
Proposed for Promotion				01
Recommended for promotion				01

Sr No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular TT	Qualificati on	Remarks
1	11	Muhammad Fayaz GHS. HK	15/6/1970	17/5/1993	MA /B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded 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/she is wrongly promoted he/She will be reversed.
- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 4627-32 / File No. 2/Promotion SST B-16: Dated Peshawar the 22/2/2019  
Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Malakand.
3. District Accounts Officer Malakand.
4. 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

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

	GHS HarYan kot				DEO (M) Malakand for further posting against SST (General) Post
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**5. PROMOTION OF STT/IT TO SST (GENERAL) BPS-16**

Total No of vacant pots of SST (General)					24	
25% share initial recruitment					06	
75% share for Promotion					18	
40% share of Promotion of SDM/DM					01	
Posts available for promotion					01	
Proposed for promotion					01	
Recommended for promotion					01	
S No	S.L No	Name of official & present place of posting	Date of Birth	Date of Appoint as Regular PST	Qualification	Remarks
2	11	Muhammad Fayaz GHS, HK	15.06.1970	17.05.1993	MA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) Post

**Terms and Conditions:-**

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded 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 takin 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/she is wrongly promoted he/she will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by
9. Their posting will be made on School based, they will have to serve at the place of posting and their service is not transferable to any other station.
10. Before handing over charge once again their document may be checked if they have not the required relevant qualification as per rules, they may not be handed over charge of the post.

(Hafiz Dr Muhammad Ibrahim)  
Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst No. 4627-32/File No. 2/Promotion SST B-16 Dated Peshawar the 22.02.2019  
Copy forwarded for information and necessary action to the:-

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

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



"E" -15-

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

Subject:- DEPARTMENTAL APPEAL FOR ANTE DATED PROMOTION TO THE POST OF SST (BPS-16) BIO/CHEMISTRY W.E.F. 28.10.2014 INSTEAD OF 22.2.2019

Respected Sir,

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

That the appellant was initially appointed against the post of Certified Teacher (CT) BPS-9 now BPS-15 vide order dated 7.10.1989. That where after the appellant was promoted to the post of SCT (BPS-16) vide Notification dated 21.2.2013. That right from appointment till date the appellant is serving the Department quite efficiently and up to the entire satisfaction of his superiors.

That in the year 2014 the promotion of the appellant to the post of SST (BPS-16) Bio/Chem was due but unfortunately the appellant was ignored and junior to the appellant were promoted to the post of SST (BPS-16) vide Notification dated 28.10.2014. That feeling aggrieved the appellant time and again visited the concerned quarters for his promotion but of no avail. That finally vide Notification dated 22.2.2019 the appellant has been promoted to the post of SST (BPS-16) Bio/Chem but with immediate effect instead of w.e.f. 28.10.2014. That the appellant is entitled to be promoted to the post of SST (BPS-16) from the date when his juniors were promoted i.e. w.e.f. 28.10.2014.

Forgoing in view, it is humbly requested that on acceptance of this departmental appeal the impugned notification dated 22.2.2019 may kindly be modified/rectified to the extent of ante dated promotion of the appellant to the post of SST (BPS-16) Bio/chem i.e. w.e.f. 28.10.2014 with all back benefits along with seniority.



Yours obediently,

A. Akbar SST (BPS-16) Bio/Chem,  
GHS No.2 Sakhakot, Tehsil Dargai, District Malakand

2201  
31/12/22

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

APPEAL NO: \_\_\_\_\_ OF 2023.

Ali Akbar

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt:

(RESPONDENT)  
(DEFENDANT)

I/we Appellant

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

Dated. \_\_\_\_/\_\_\_\_/202

  
**CLIENT**

**ACCEPTED**

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

  
**KAMRAN KHAN**

  
**UMAR FAROOQ MOHMAND**

  
**WALEED ADNAN**

&

  
**MUHAMMAD AYUB**  
**ADVOCATES**

**OFFICE:**

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