22.11.2022

Junior of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Junior of learned 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 on 10.01.2023 before the D.B.

(Mian Muhammad) Member (E)

(Salah-Ud-Din) Member (J)

10.01,2023

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mst. Shandan Ghani, ADO (Litigation) for the respondents present.

#### SCANNEDA KPST Peshawar

Learned Member Executive (Miss Fareeha Paul) left the court at 11.00 A.M in order to attend a meeting in the Law Department, Government of Khyber Pakhtunkhwa, therefore, this case is adjourned to 07.04.2023 for arguments before the D.B.

(Rozina Rehman)

Member(J)

Learned counsel for the appellant present. Nabirullah Khattak, Addl. AG for the respondents present.

Mr

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Last opportunity is granted. To come up for arguments before the D.B on 16.06.2022.

(Fareeha Paul) . Member (E)

Chairman

16.06.2022

Learned counsel for the appellant present. Mr. Arshad Ali, ADEO (Litigation) alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come for arguments on 09.08.2022 before the D.B.

(MIAN MUHAMMAD) MEMBER (EXECUTIVE)

(SALAH-UD-DIN) MEMBER (JUDICIAL)

9-8-2022

Due to the Public holiday the exagjourned to 22-11-2022

Reador



12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

Chairman

12.10.2021

Counsel for the appellant present.

Mr. Kabirullah Khattak, Ádditional Advocate General alongwith Muhammad Haroon ADEO (Litigation) for respondents present.

Reply/comments on behalf of respondents submitted. Learned counsel seeks adjournment in order to submit rejoinder; granted with direction to submit rejoinder within 10 days in office. To come up for arguments on 10.01.2022 before D.B.

(Atiq-U. Rehman Wazir) Ølember (E)

(Rozina Rehman) Member (J)

10.01.2022 Learned counsel for the appellant present. Mr. M. Rashid, DDA for respondents present.

Due to non-availability of Hon'able Member (J), the case could not be heard. Adjourned. To come up for arguments on case of a large second companies on applications.

26.0年2月15年16日

(MIAN MUHAMMAD) . MEMBER (E) 02.06.2021

Counsel for the appellant present. Preliminary arguments heard.

ロソララ

Points raised need consideration. The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 12.10.2021 before the D.B.

Appellant Deposited
Security & Recess Fee

G # 1

#### Form- A

#### FORM OF ORDER SHEET

Court of			 
	1.750		
	-1111 - 1111	/2021	

	Case No	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/04/2021	The appeal of Mst. Khadija Bibi resubmitted today by Mr. Nasir Mehmood Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
		REGISTRAR
2-	27/05/21	This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>O2(06/2)</u>
, 	4	
	,	

The appeal of Mr. Khadija Bibi PST GGPS Muhammad Gul Killi Hassan Khel Sub Division Peshawar received today i.e. on 25/03/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of appointment order mentioned in para-2 of the memo of appeal (Annexure-B) is not attached with the appeal which may be placed on it.
- 2- Copy of grounds of Writ Petition mentioned in par-9 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 594 /S.T.

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Nasir Mehmood Adv. Pesh.

The Mullill

08/04/2021

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

Service Appeal No	1755/2021
<b>L</b> I	

Khadija Bibi ......Appellant

#### **VERSUS**

Govt. of Khyber Pakhtunkhwa, through
Through Chief Secretary and others .......Respondents

#### INDEX

S.No.	Description of documents.	Annexure	Page
1.	Memo of appeal with affidavit.		1-8
2.	Addresses of parties		9
3.	Copies of educational testimonials	A	10-15
4.	Copy of appointment order dated 25.09.2009	В	15
5.	Copy of BA Degree & regularization order dated 21.01.2013	C	17 - 20
6.	Copy of the Master degree and certificates	D	21-27
7.	Copy of the Notification dated 13.11.2012 & notification dated 24.07.2014	E-F	28
8.	Copy of the letter and notification	G	57-58
9.	Copy of grounds of writ petition and judgment dated 25.08.2020	Н	59-71
10.	Copy of impugned order dated 19.03.2021	I	72
11.	Wakalatnama		73

**Appellant** 

Through '

**Nasir Mehmood** 

Advocate

Supreme Court of Pakistan

Cell:

#### <u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE</u> TRIBUNAL, PESHAWAR

Service Appeal No	/2020	

#### VERSUS

- 1. Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2. Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
- Director Elementary & Secondary Education, Near Govt. Higher Secondary School City No.2, Peshawar.
- 4. District Education Officer, Hassan Khel, Sub-Division (HSD), Peshawar.

....Respondents

SERVICE APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 19.03.2021 VIDE WHICH DEPARTMENTAL APPEAL OF THE APPELLANT, WHEREBY THE APPELLANT CHALLENGED THE VIRES OF NOTIFICATION DATED 13.11.2012 WAS DISMISSED WITHOUT ASSIGNING ANY REASON

#### Respectfully Sheweth:-

1) That appellant is a bonafide resident of Hassan Khel Sub-Division Peshawar and having qualification of

(2)

Intermediate and Primary Teaching Certificate (PTC). (Copies of educational testimonials are Annex "A")

- That appellant was appointed as Primary School teacher upon the selection of the Departmental Selection Committee in Community School, Hassan Khel Sub Division, Peshawar, vide appointment order dated 25.09.2009. (Copy of appointment order dated 25.09.2009 is Annex "B")
- 3) That later on, the appellant improved her qualification by getting degree of Bachelors of Arts in the year 2011 and on the basis of which the services of appellant were regularized vide order dated 21.01.2013. (Copy of BA Degree & regularization order dated 21.01.2013 are Annex "C")
- That the appellant further improved her qualification by getting Master Degree in Islamiat, B.Ed, Certificate of Teaching (C.T) and also having diploma in Physical Education. (Copy of the Master degree and certificates are Annex "D")
- 13.11.2012 in exercise of power under sub-rule 2 of Rule 3 of KP Civil Servant (Appointment, Promotion & Transfer Rules, 1989) laid down the method of recruitment, qualification and other condition further post of different School Teacher as specified in the notification ibid. Through this notification promotion to the post of Physical Education Teacher (appellant) BPS-15 was laid down as under:-
  - "(a) Eighty percent by initial recruitment and;

(b) Twenty percent 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.

> 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.

Through notification dated 24.07.2014, further amendment were made in the above said rules and for promotion to the post of Secondary School Teacher (SST) BPS-16, proviso was inserted therein through which Primary School Teacher (BPS-12) having seven years' service were made eligible for promotion to the post of SST (BPS-16), provided if no suitable candidate was available from amongst Senior Primary School Teacher. The same is reproduced for ready reference.

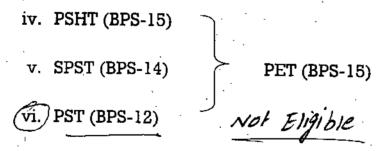
"Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years' service as such

and having qualification mentioned in column No.3"

The above said provisions would show that the Primary School Teacher (BPS-12) was made eligible for promotion to the post of SST (BPS-16), but on the other hand PST (BPS-12) having qualification of Diploma in Physical Education was not eligible for promotion to the post of PET (BPS-15), which is discriminatory and is against the fundamental rights of the petitioner. (Copy of the Notification dated 13.11.2012 & notification dated 24.07.2014 are Annex "E & F")

6) That in order to further simplify the issue the following chart will assist this hon'ble Tribunal for reaching just and appropriate decision.

Meaning thereby that the PST (BPS-12) was made eligible for promotion to the post of BPS-16.



7) That the respondent No.4 requested respondent No.3 for availability of the representative for promotion from the post of PSHT to CT-15, DM-15, PET-15 and from PST to SPST-14, PSHT-15, the DPC meeting has been held

and Teachers have been promoted. (Copy of the letter and notification are Annex "G")

- PSHT, SPST & PST having qualification of Diploma in Physical Education except the appellant, but since in the Rules there is no avenue for promotion of Physical Education, therefore, no promotion is to be effected to PET (BPS-15). Consequently the post left out from promotion will be advertised for initial recruitment.
- 9) That the appellant having no avenue for promotion to the post of PET (BPS-15) in the Rules, being highly aggrieved, wherefrom, approached to the hon'ble High Court by filing WP.No.3453/2020, which was converted into departmental appeal and send to department/concerned authority for its decision. (Copy of grounds of writ petition and judgment dated 25.08.2020 are Annex "H")
- 10) That, thereafter, the respondents/ concerned authority without assigning any reason, dismissed/ rejected the departmental appeal of the appellant vide order dated 19.03.2021. (Copy of impugned order dated 19.03.2021 is Annex "I")
- 11) That appellant now having no other remedy approaches this Hon'ble Tribunal on the following grounds:-

#### GROUNDS.

A. That the appellant is a natural born citizen of Islamic Republic of Pakistan, belonging from Hassan Khel Sub-Division, Peshawar and is fully entitled to all the basic

and fundamental rights as enshrined in the constitution and interpreted and guaranteed by the law of the land.

- B. That the appellant has not been treated in accordance with law and the rights of the appellant from promotion have been violated, which is not permissible in law and Article 9 r/w Article 18 of the Constitution of the Islamic Republic of Pakistan, 1973, therefore, directions is required to the respondents for insertion in the Rules for promotion of PST having qualification of Diploma in Physical Education to the post of PET (BPS-15).
- C. That the respondent No.3 has illegally rejected the departmental appeal of the appellant, without giving any reason, thus the same is liable to be set-aside on this score alone, because it is, settled principle of law that every authority is bound under the law to pass order by giving reasons, which is not been done by respondent No.3.
- D. That the fundamental rights of the appellant have blatantly been violated by the respondents and the appellant and other candidates having qualification of Diploma in Physical Education has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- E. That the appellant fulfilled all the criteria provided for the post of PET in question, but since in the Rules the PST having qualification of Physical Education have been excluded in the Rules, therefore, the same non-inclusion in the Rules is against the Article 25, 25-A, 27 of the Constitution of Islamic Republic of Pakistan, 1973.

- F. the appellant is holding the prescribed. qualification for promotion against the post of PET, besides she has at his credit the higher qualification of MA degree, B.Ed, CT and Diploma in Physical Education, however, in the Rules on one side the PST (BPS-12) has been made eligible for the post of SST (BPS-16), but on the other hand PST (BPS-12) having qualification of physical education has been made ineligible for the post of PET (BPS-15), which is against the provision of the Article 3 & 4 of the Constitution of Islamic Republic of Pakistan, 1973 thus may be declared so.
- G. That any other ground not raised here superficially, may graciously be allowed to be raised at the time of arguments.

#### PRAYER

It is therefore, humbly prayed that on acceptance of this appeal, the impugned order dated 19.03.2021 may graciously be set-aside, and appropriate directions be issued by declaring non-inclusion of the Primary School Teacher (PST) BPS-12 for promotion to the post of Physical Education Teacher (BPS-15) as illegal, discriminatory, against the fundamental rights as enshrined in the constitution, against the principal of policy, and be liable to be declared so, and the impugned notification dated 13.11.2012 through which the Appointment, Promotion & Transfer Rules, 1989 were issued by the respondents/ department may kindly be declared illegal and discriminatory to that

extent by directing them to insert the post of PST (BPS-12) for promotion to the post of PET (BPS-15)

Any other relief which this hon'ble court deems appropriate in the circumstances of the case though not specifically asked for may kindly also be granted.

Dated:

Appellant

Through

Nasir Mehmood Advocate Supreme Court of Pakistan

#### **AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Deponent

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

Service Appeal No/2018
Asad Ullah KhanAppellant
<u>VERSUS</u>
Provincial Govt. of Khyber Pakhtunkhwa, through Secretary Establishment Department and others
.,Respondents

ADDRESSES OF PARTIES

#### APPELLANT.

Khadija Bibi W/o Muhammad Kifayat Ullah, PST, GGPS Muhammad Gul Killi Hassan Khel, Sub-Division (HSD), Peshawar

#### RESPONDENTS

- Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2. Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
- Director Elementary & Secondary Education, Near Govt. Higher Secondary School City No.2, Peshawar.
- 4. District Education Officer, Hassan Khel, Sub-Division (HSD), Peshawar.

Appellant

Through

Nasir Mehmood Advocate Supreme Court of Pakistan 473173 S.No.

Roll No 150409

Boar

This is to Certify that

and a resident of

Examination of the Board
candidate. She obtained
The Candidate passed in

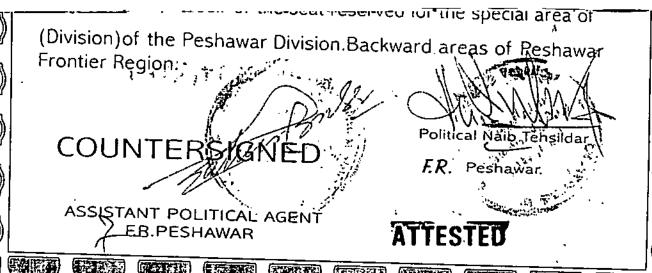
1. English

TO THE PARTY OF TH

5. General Science

Date of birth according to I

WASSII Secretary



(13) جناب عالى! تقدیق کی جاتی ہے، کہامی سمات میں ایجر بی بی ولدارد من الله المن الترك المنافق المنافي بالطفيل الف،آر، بيثاور كامستقل بيدائش باشده ہاوراس كاباؤاجداد بھى يہاں كے ستقل كيدائش باشد نے ہيں۔ ہمارے ساتھ تو می نفع اور نقصان میں برابر کے شریک ہے۔ میں ان کوذ اتی طور پر جانتا ہوں ۔ لہذا تصدیق عرض ملك نبر1: عير 1 عير كال نبر2 مير التي الك نبر 3 في كال

## Clama Aqbal Open Aniversity



Certified that Mr. 18116

КИАВИА ВІВІ

San / Daughter of

GUL ZAMIR

Registration No.

06 NPR 0945

Roll To T 628767

Semester

AUTUMN 2006

having met all the requirements

under the semester system is this day awarded the

#### Primary Teaching Certificate

The She has secured

59 %

and has been placed in



ATTESTED

Result declared on:

Date of issue:

September 20, 2007

March 10, 2008

Controller of Examinations

This certificate is issued without alteration/erasure.

The detail of courses passed is as under

Course code	Tille of the course	Percentage of Marks obtained
613	Principles of Education	57
614	Educational Psychology	49
615	School Organization and Management	50
616	School Community and Practical Arts	63
617	Teaching of Urdu	59
518	Teaching of Mathematics	>.
619	Teaching of Science and Physical Education	71
620	Teaching of Islamiat and Social Studies	58
611	Practical Workshop and Teaching Practice	59
:		
	ATTESTED	
Total credit hours	XXX Obtained / Total marks	J

XXXObtained / Total marks Total credit hours 5 Full Credits XXXTotal credits AIOU Cumulative grade point average SPRING 2006 AUTUMN 2006 First semester Final semester Grading Scheme

80% and above: A+ grade 70% to 79% A grade 60% to 69% B grade

50% to 59% C grade 40% to 49% D grade

Below 40%

Controller of Examinations

Anned B OFFICE OF THE AGENCY EDUCATION OFFICER F.R PESHAWAR/ F.R KOHAT

#### APPOINTMENT.

Consequent upon the selection of the Departmental Selection Committee, the following PSTs (Female) Trained Local candidates of FR Peshawar are hereby appointed purely on regular (Non-Pensionable) basis in BPS-07 @ (Rs.3530-190-9230) PM fixed plus usual allowances as admissible under the rules with effect from taking over charge in the community schools noted against their names.

SNO	Name/ Father Name	School where appointed	Remarks
1.	Fozia D/O Sher Dil Khan	FCS Ajmal Khan Kalli FR Peshawar	Against vacant PST post
2,	Bas Bibi D/O Abdul Samad	FCS Asmat Khan Kalli FR Peshawar	-do-
 	Shaila D/O Muhammad Ayat	FCS Ajmal Khan Kalli FR Peshawar	-do-
4.	Hafiza D/O Muhammad Ismail	FCS Sultan Shah Kalli FR Peshawar	-do-
5.	Khadija Bibi D/O Gul Zamir	FCS Jamal Shah Kalli FR Peshawar	-do-

#### **TERMS & CONDITIONS: -**

- Charge report should be submitted to all concerned. 1.
- The appointment of the candidate being purely on temporary basis for the project period and is liable to termination at any time without any notice by ending of project their 2. services will be considered terminated automatically.
- If the candidates wish to resign their post they will give One-Month prior notice or their 3. pay for one month will be forfelted in lieu thereof.
- They should produce their original, academic, Professional Certificates, Domicle and NIC 4. copy before proper verification from the quarters concerned.
- They should produce their Health and Age Certificate from the Medical Superintendent S. concerned.
- They may not be handed over charge if they are below 18 years or above 40 years. 6.
- If they fail to report within 15 days then will be treated as cancelled automatically. 7.
- No salary may be drawn before the verification of all the testimonials from the quarter 8. concerned.
- If any technical legal flaw is pointed out the appointment will stand as cancelled. 9.
- The appointee will not be entitled to pension/ commutation/ annual increment and G.P 10. Fund emoluments.
- SNO. 4 & 5 subject to the condition that in case of repatriation 2 regularized teachers then 11. their services will be liable to termination automatically.

Endst: No. 2141-51 Dated 25 Copy forwarded to the: -

Director Education FATA, NWFP Peshawar.

- Addl: Accountant General (PR) Sub Office Peshawar. 2.
- Accountant Local Office. 3.
- Assistant Political Agent, FR Peshawar. 4:
- Candidate Concerned. 5.
- EMIS Local Office. 6.
- AAEO (Female) FR Peshawar.

(ASMAT KHAN AFRIDI) **Agency Education Officer** FR Peshawar/ FR Kohat

Agency Education Officer FR Peshawar/ FR Kohat

ATTESTED

# Clama Appal Open Anings



serial No. 135156

Cedified that Ma/Ma KHADIJA BIBI

San / Daughter of

GUL ZAMIR

Registration No

06NPR0945

Rall To

Senestee

AUTUMN 2010 having met all the requirements under

the semester system is this day awarded the degree of

#### Bachelor of Arts Group - General

He/She has secured

Date of Issue:

November 16, 2011

#### ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

Serial No. 235795

Name

KHADIJA BIBI ..

Father's Name GUL ZAMIR

Address

C/D ARIF CT POST OFFICE GHS

AKHORWAL ADAM KHEL

KOHAT Tchsil.

District

KOHAT

has successfully completed

Roll No. AB430437 Registration No.O6NPRO945 Final Semester AUT- 2010

BACHELOR OF ARTS GROUP-GENERAL

The detail of passed courses are as under:

Code	Title of Course		
		Maximum	Obtained
AUT- 06   0417	PAKISTAN STUDIES(C)	100	56
AUT- 08 0416	ISLAMIAT (C)	100	62
3PR- 09 0436	SEERAT-E-TAYYABA	100	<b>6</b> 2
EPR- 09 0437	ISLAMIC STUDIES(E)	100	5¢
UT- 09 0407	MODERN MUSLIM WORLD	100	45
NUT- 07 0464	ISLAMIC FIGH	100	65
3PR- 10 0445	HISTORY OF URDU ADAB	100	<del>6</del> 2
NT- 10 0406	LCONOMICS OF PAKISTAN	100	68
10 - TU	COMPULSORY ENGLISH-I	100	64
NUT- 10 1424	COMPULSORY ENGLISH-II	100	చక
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CREDITS: 8

Result Declared on AUGUST 15,201i

Total Marks / Obtained 1000/ 603

Date of issue

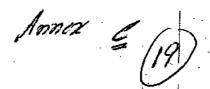
Controller of Examinations

Disclaimer:

AUGUST 20,2011

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





AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT:
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

No. 6201-06 Dated 21,01.2013

#### RE- APPOINTMENT.

Consequent upon the order of the Governor of Khyber Pakhtun Khwa issued vide Secretary Social Sector Department FATA Secretariat Notification No.SO(E)/SSD/CSTR/99-108 dated 11.05.2012, the following female teachers of Community schools are hereby re-appointed as PST in BPS-7 (Rs.5800-320-15400) PM plus usual Allowances on contract regular Non Pensionable basis with effect from the date of their taking over charge in the following schools in the interest of public service on the below mentioned terms and conditions:

S.No	Name.	Father Name	Posted at	Remarks.
1 :	Fozia	Sherdil Khan	GGPS Ajab Khan Killi	Against Vacant Post
2	Nasreen Bibi	Nader Khan	GGPS Khalid Khan	Do
3	Fozia Ayub	Gulam Hussain	GGPS Rehman Afzal	Do
4	Shamila Bibi	Muhammad Igbal	GGPS Younas Khan	Newly created post
_5	Hafiza	Muhammad Ismail	GGPS Dawa Khan	Against Vacant Post
<u> </u>	Khadija BiBi	Gul Zamir	GGPS Noor Daman	Do .
7	Shakeela Naz	Said Sher	GGPS Janat Khan	Do
8	Shazia	Sahib Gul	GGPS Dawa Khan	Do "
9	Ume Habiba	Muhammad Khan	GGPS Yar shah	Newly created post
10	Hameeda	Feroz Muhammad	GGPS Khewa Gul	Against Vacant Post
11	Bushra Khanum	Abdul Maiik	GGPS Yar shah	Newly created post
12	Naila BiBi	Muhammad Iqbal	GGPS Khalid Khan	Against Vacant Post
13[	Seema Igbal	Iqbal Shah	GGPS Rahman shah	Do
14	Shazia Habib	Noor Habib	GGPS Zul Figar	Newly created post
15	Amina BiBi	Mehboob Khan	GGPS Zul Figar	Do Do
16	Zainab BiBi	Abdul Qayum	GGPS Burki No.2	Against Vacant Post

#### TERMS AND CONDITIONS.

- 1) Charge report should be submitted to all concerned.
- 2) If a candidate wishes to resign her post she will give one Month prior notice or her pay for one month will be forfeited in lieu thereof.
- They should produce their original Certificates/documents for verification (In case of non entry in their service Books.
- 4) If any technical legal flaw is pointed out the appointment will stand as cancelled.
- 5) The appointees will not be entitled to pension/commutation and G.P Fund emoluments.

SYED HUSSAIN AFRIDI AGENCY EDUCATION OFFICER FR PESHAWAR.

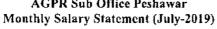
#### Copy for information and necessary action to the:-

- 1) Additional Accountant General (PR) Sub Office Peshawar.
- 2) Director Education FATA Peshawar.
- 3) Principals/Headmasters of schools concerned.
- 4) AAEO (M) FR Peshawar.
- 5) Candidates Concerned.
- 6) Accountant Local Office.

AGENCY EDUCATION OFFICER

FR Peshawar

#### Government of Pakistan AGPR Sub Office Peshawar





NTN:



Information of Miss KHADIJA BIBI d/w/s of GUL ZAMEER

Personnel Number: 50173068

Date of Birth: 14.02.1988

CNIC: 1730183155280

Entry into Govt. Service: 01,02.2013

Length of Service: 06 Years 06 Months 001 Days

**Employment Category: Active Temporary** 

Designation: PRIMARY SCHOOL TEACHER

99999999-Not Available

DDO Code: PR0215-AGENCY EDUCATION OFFICER F R PESHAWAR

Cash Center:

Payroll Section: 006

GPF Section: 002 Interest Applied: Yes

GPF Balance:

110,974.00

GPF A/C No: Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil

BPS: 12

Pay Stage, 6

	Wage type	Amount		Wage type		Amount
0001	Basic Pay	19,080.00	1000	House Rent Allowance		1,961.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance		1,500.00
1528	Unattractive Area Allow	1,000.00	2148	15% Adhoc Relief All-2013		400.00
2199	Adhoc Relief Allow @10%	275.00	2211	Adhoc Relief All 2016 10%	-	1,434.00
2224	Adhoc Relief All 2017 10%	1,908.00	2247	Adhoc Relief All 2018 10%		1,908.00
	Adhoc Relief All 2019 10%	1,908.00				0.00

#### **Deductions - General**

Wage type		Amount		Wage type	Amount
3012	GPF Subscription - Rs2220	-2,220.00	3657	Group Insurance (FATA)	-2.00
3661	E.E.F (Exchange)	-100.00	3701	Benevolent Fund(Exchange)	-180.00
3705	R. Ben & Death Comp(Exch)	-600.00			0.00

#### Deductions - Loans and Advances

Loan	Descr	iption	Principal a	mount	Deduction	Balance
	•.	•				
Deductions' Payable:	- Income Tax 0.00 Recover	ed till JUL-2019:	0.00 E	xempted: 0.00	Recoverable	0.00
Gross Pay (	Rs.): 34,230.00	Deductions: (Rs.):	-3,102.00	Net P	ay: (Rs.): 31,12	8.00
Account Nu	e: KHADIJA BIBI imber: 001000824454001 ls: ALLIED BANK LIMI		, MARI PESHAW	'AR BHANA N	MARI PESHAWAR, I	PESHAWAR
Leaves:	Opening Balance:	Availed:	Earned:		Balance:	

Permanent Address:

City: PESHAWAR -

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: khanafd2016@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SAPCCSUPPORT/26.07.2019/17.15:53/v1.1)
\* All amounts are in Pak Rupees
\* Events & amissions excented



#### University of Peshawar Pakistan

#### Detailed Marks Certificate

#### Master of Arts in Islamiyat Final Annual Examination 2017

District Peshawar

Private

Name: KHADIJA BIBI

Father's Name: GUL ZAMIR

Gender: Female

Roll No: 26038

Registration No: 2015-PE-29592

Division: 2nd

Papers	Max Marks		Marks Obtained	<del></del>
	<u> </u>	In Figures	In Words	<del> '</del>
Al Quraan Translation 2nd Half & Tafsir of Surah Nur & Ahzab-VI	100	52	Fifty Two	3 .5 1
Usul al-Fiqh(Principles of Islamic Jurisprudence)-VII	100	40	Forty Only	ę,
Comparative Study of Judaism, Christianity & Islam-VIII	100	55	Fifty Five	
Al-Kalam & Philosophy of Islam-IX	100	48	Forty Eight	:
Eco System of Islam (Comparison with Modern Eco Thought)-X	100	53	Fifty Three	
Viva Voce	100	60	Sixty Only	
				4) 4)
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revious 17234:Annual-2015	500	242	Two Hundred and Forty Two	<del></del>
inal	1100	550	Five Hundred and Fifty	

Errors & omissions are subject to subsequent rectification

The Examination was taken In Parts

Examination held From 02-Aug-2017 to 16-Sep-2017 Result Declared on Wednesday, February 21, 2018

Issue Date: 02-Apr-2018

9<sup>-</sup>48 am

Chance:

(**Dr. S. FazI-i-Hadi)** CONTROLLER OF EXAMINATIONS UNIVERSITY OF PESHAWAR

Computerized by RTC

City Area

# University of Peshawar Pakistan

This certifies that

Khadija Bibi daughter of Gul Zamir

having fulfilled all the requirements is hereby admitted to the degree of

# Master of Arts in Islamiyat

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 21st day of February, 2018.

Roll No. 26038

Session: Annual 2017

Reg. No: 2015-PE-29592



Registrar

Vice Chancellor

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

Name

IDIE ALIDAHA

Father's Name

Father's Name GUL ZAMIR

Address C/O ARIF CT F/O GHS AKHORWAL DARA ADAM

EHEL FR KOHAT

Tehsil

F. R. KOHAT

District

KOHAT

has successfully completed-

Roll No. Final Semester

Registration No. O6NPRC945

SPR-2014

BACHELOR OF EDUCATION(B. ED)

he detail of pass		is as under:		
Semester	Course Code	Title of Course		irks
AUT- 13	0513	SCHOOL ORGANIZATION	Maximum 100	Obtained 63
61 -TUA	0651	ENGLISH (COMPULSORY)	100	65
Ei -TUA	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	48
AUT- 13	0512	PERSPECTIVES OF EDUCATION	100	64
AUT- 13	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	54
. AUT- 13	0514	EVALUATION, GUIDANCE & RESEARCH	100	75
SPR- 14	0655	WORKSHOP & TEACHING PRACTICE	100	92
3PR- 14	0654	TEACHING OF ISLAMIAT	100	. 64
SPR- 14	OS17	TEACHING OF FAKISTAN STUDIES	100	<b>57</b>
-		MUHAMMAD SAMIULLAH  Dent: Human Flutthon The University of Agriculture Pashana:		

CREDITS:

Total Marks / Obtained

900 / 612

Result Declared on

JANUARY 15, 2015

Percentage / Grade

68 17700

Date of issue

JANUARY 20, 2015

Controller of Examinations

Disclaimer:

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

account Sabal Maiversity **V**slamubud



111691

Certified that Mr / Mr KHADIJA BIBI

Son / Daughter of

**GUL ZAMIR** 

Registration No

06-NPR-0945

 $\mathcal{R}_{all}$   $\mathcal{N}_{a}$  AM691793

Semester

SPRING 2012

having met all the requirements under

the semester system is this day awarded the

#### Certificate of Teaching

He/She has secured

and placed in



Result declared on:

January 16, 2013

Date of issue:

April 17, 2014

Controller of Examinations

Note: This certificate is issued without alteration/erasure The detail of courses is overleaf.

The detail of courses passed is as under Percentage of Marks Course obtained code Ŵ. 69 DIMENSIONS IN EDUCATION 631 62 EDUCATIONAL PSYCHOLOGY 632 80 SCHOOL ORGANIZATION 633 73 ENGLISH AND ITS TEACHING 634 TEACHING STRATEGIES & EVALUATION 69 638 PRACTICAL WORKSHOP & TEACHING PRACTICE 94 612 72 URDU LANGUAGE AND ITS TEACHING 604 58 SOCIAL STUDIES & ITS TEACHING 605 70 ISLAMIAT AND ITS TEACHING 635 647/900 XXX Obtained / Total marks Total credit hours XXX 5 Cumulative grade point average Total credits AIOU **SPRING 2012** First semestre: AUTUMN 2011 Final semestor Grading Scheme A∗ grade 80% and above A grade\_ 70% to 79% ß grade 60% to 69% 50% to 59% C grade Controller of Examinations D grade 40% to 49% Fail Below 40%

Serial No. 000450

# Abdul Wali Khan University Roll No.

Reg. No. 14-AU-CPERP-3

2562

Mardan, Pakistan



Mr. / Ms. KHADIJA-BIBI The University in recognition of the fulfilment of prescribed requirements has conferred upon Son / Daughter of \_ GUL ZAMIR

The Diploma in

# PHYSICAL EDUCATION

in the examination held-in May 2015 session Fall 2014-15

The examination was taken as a whole / A Parts

He / She was placed in \_

2.63

. Division / Grade / CGPA



Controller of Examinations

17-09-2015

Registrar

THE STATE OF THE S

Vice Chancellor



#### ABDUL WALI KHAN UNIVERSITY

MARDAN, PAKISTAN

#### TRANSCRIPT

#### COLLEGE OF PHYSICAL EDUCATION & RESEARCH, PESHAWAR DPEd

. Name: <u>Khadija Bibi</u>

Father's Name: Gul Zamir

Roll No: <u>2562</u>

Registration No: 14-AU-CPERP-24

	st Seme	ster (Fall,	2014)			····	
Title of Course	Total Marks	Marks Obtained	CR Hrs	Grade	GP	GPA	Remark
Foundation of PE	100	52	3"	C-	6		<del>                                     </del>
Anatomy & Physiology	100	53	3	C-	6		
Rules & Technique of Games & Sports	100	53	3	C-	6		
Practical Games & Sports	50	30	2	C+	5		<u> </u>
Practical Track & Field	50	33	2	B-	5.5	·	<del> </del>
Practical Edu Gymnastics	50	33	2	B-	5.5		<del> </del>
Teaching Practice	50	44	2	A	7.5		
TOTAL	500	298	17		41.5	2 44	Promoted
2n	d Semest	er (Spring	2. 2015)	L	71.0	<u> </u>	Promoted
Title of Course	Total Marks	Marks Obtained		Grade	ĠP	GPA	Remarks
Health Education	100	69	3	B-	8.25		
Science of Movement	100	. 86	3	A	11.25	<del></del>	
Science of Track & Fleid	100	72	3	В	9		<u> </u>
Practical of Games & Sports	50	30	2	C+	5		
Practical of Track & Field	50	32	2		5		<u> </u>
Practical of Gymnastics	50	33	2	B-	5.5		
Project	50	30	2	C+	5		
Viva Voce	50	25	2	C-	4		
TOTAL	550	377	19		53	2 70	Passed
CGPA	1050	675	36		94.5	2,13	- a5560

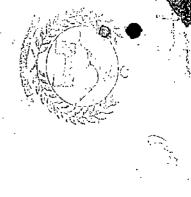
Errors & Omissions are subject to subsequent rectification

Result Declaration Date: - Sep 17, 2015

Prepared by: Computer Cell Checked by: Ijaz Ahmad

giarathe =

Controller of Examinations



" 医子宫外外的 人名英格兰斯斯特斯

ELEMENTARY AND SECONDARY EDUCATION DEPÁRTMENT. ZAČTANO LIDINU BRIKITAO LASIMANATAOD

## NOTIFICATION

Peshowar, dated the November 13,2012.

said Appendix and the schedule therewith. 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 Education Department in consultation with the Establishment Department and the Finguee Department hereby lays down the method of recruitment, Exercints (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Noiso(PR)4-5/8SRC/Meating/2012/Teaching Cadres in pursuance of the provisions contained in substale (2) of sulc 3 of the Khyter Pakhtunkhwa Cive

Lodist, No. & Delb as aboys

Copy forwarded to,-

AECRETARY TO GOVERNMANT OF THE KHYBER PAIGHTONKHWA ELEMENIARY AND SECONDÁRY EDUCATION DEPARTNENT.

The Secretary to Govt. of Khyber Pakhiunkhwa, Establishment Departmont. The Secretary to Cold. of Khyber Pakhtunkhwa, Finance Department.

The Secretary to Gowl of Khyber Patchankhwa, Law Department.

The Sacretary Knyber Fukritunkhya, Public Service Commission Peshawor.

The Director (Eass) Khyber Pa'vitunkhwa Peshawar. l ho Accountant General, (ਨ)/ber Pakhtunkhva Peshaver

The Director Education (EATA), Pomewar,

# GOVERNMENT OF THE KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

### Notification

Peshawar dated the November 13, 2012

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

Secretary to government of the Khyber Pakhtunkhwa Elementary & Secondary Education Department

Endst No. & Date as above

## Copy forwarded to:-

- 1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
- 2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
- 3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department.
- 4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar
- 5. The Accountant General; Khyber Pakhtunkhwa Peshawar.
- 6. The Director (e7SE) Khyber Pakhtunkhwa Peshawar
- The Director Education (FATA), Peshawar.

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11. The Deputy Director Database(EMIS) E2SE Department 10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar. The Director (PITE) Khyber Pakhtunkhwa Peshawar The Director Curriculum & Teachers Education Abbottabad

12. All District Coordination Officers in Khyber Pakhtunkhwa.

14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA. 13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.

17. P.S to Chief Minister, Khyber Pakhtunkhwa 16. P.S to Governor, Khyber Pakhtunkhiva 15 All Agency Education Officers FATA

19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar. 13. P.S to Chief Secretary, Khyber Pakhtunkhwa

21. Master File, 20, PS to Secretary, E&SE Department.

Sechon Officer (Primary)

### VIGNERAL

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		· 		· :-		S.No.
			-	Secondary School Teacher (BPS-16).	post.	Nomenclature of the
j		/ -3.	(ii)	9	-	
		mover Curvetsily.	M.A in Education or Bachelor's Degree in Education, from a recognized University; or	- 142 DE 1	Minimum qualification and experience for initial appointment or by transfer.	(
				18 to 35	Age	,
	(ii) (ii)			(a)		
Physical Education Teachers with at least five years service as such and having qualification mentioned in column 140, 3.	_		(i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture)	Fifty percent by promotion on the basis of seniority-cum-fitness, in the following	Method of recruitment	
	4					

		<u> </u>		F	THE STATE OF THE S	ing interest of the second of
		Senior Certified Teacher (SCT)(General).	Senior Theology Teacher (SIT) (B-16).	Senior Arabic Teacher (SAT) (BPS-15)		
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	r promotion ness, from eneral), with d having que ruitment of	at least five years s qualification as press of Theology Teacher.	fitness, fro least five qualificatio recruitment	by promo	(v)	
!	By promotion, on the basis of seniority-cumfitness, from amonyst Certified Teachers and having qualification as prescribed for initial recruitment of Certified Teacher (General).	fitness, from amongst Theology Teachers, with at least five years service as such and having of Theology Teacher.	fitness, from amongst Arabic Taleast five years service as suggestification as prescribed recruitment of Arabic Teacher.	years service as such and qualification mentioned in No.3; and fifty per cent by initial recruitment.	<b>&gt;</b> 0	(iv) one po
	Sis of seni Certified Certified Frescribed acher (Gene	basis of ser heology Tea ce as such d for initial	Arabic Teac Arabic Teac ce as such rescribed eacher.	rvice as suction mention initial recru	least five yand having led in column cent from cachers wif	or cent fro
	ctity-cum- Teachers ce as such for initial	iority-cum- ichers, with and having recruitment	fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.	years service as such and having qualification inentioned in Column No.3; and er cent by initial recruitment.	with atleast five years service as such; and having qualification mentioned in column No. 3; and one per cent from amongst the Arabic Teachers with at least five	one per cent from amongst the Instructional Material Control
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:		Senior Physical Education Teacher (1898-18)	(BPS-16).	Scuior Certified Teacher		Senior Drawing Master (13PS-16).	- 171	(BPS-16).	Senior Certified Teacher (Agriculture)		(5)		
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Diton	Cess, Pro	such and he initial recru	onor	qualification as pred of Drawing Master.	așt așt	initial recn (Agriculture).	Agr		for initial recru (Industrial Arts).	as s	fitn		
5 to 6	moti fro	nd h recru	omod from	icatio swing	form five	l r	icult	orom	initi ustri	uch	pro ess:		
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recruitment of Physical Education Teacher.	By promotion, on the hasis of seniority-cum- fitness, from amongst Physical Education Teachers, with at least five years service as such	pres pres	Seni	tial r	sen Maste	tifiec	tified Year	Sc.	crtif	five	of s		•
<u> </u>	rity-	servi cribe er (F	ority 313 (1	CCLIT	is, i	. 1	i T S Ser	niori	Ed '5	years	enio		
utia]	cum- tion	such and having qualification as prescribed for initial recruitment of Cartified Teacher (Home Economics).	By promotion, on the basis of seniority-cum- fitness, from amongst Certified Teachers (Home Economics), with at least five.	qualification as prescribed for initial recruitment of Drawing Master.	fitness from amongst Drawing Masters, with at least five years service as such and braving	Agriculture).	(Agriculture), with at least five years service as such and having qualification as prescribed for	By promotion, on the basis of seniority-cum-	for initial recruitment of Certified Teacher (Industrial Arts).	as such and having qualification as preceding	fitness; from amonest Certified Teachers		
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	(General) (BPS-15).	Cartified Teacher	(BPS-15).	Senior Qari			_			(RPS_IS)	Therefore						(878-13).		-
••	recognized University with Certified Teacher			from a recognized University.		Chitral and any other Government run Darul Uloom, as notified by the Government from	Darul Uloom Chitral, Darul Uloom Daroch	Wafaqul Madaris or Darul Uloom Saidu	from a recognized Board with Shahdatul	(i) Second Class Secondary School Certificate		the Government from time to time or	Darul Uloom Darosh Chitral and any other	Uloom Charbagh Swat, Danil Uloom Chirol	a recognized Tanzimuatul Wafaqui Mudaris:	Alamia Fil Uloomul Arabia wal Islamia fron	from a recognized Board with Shahdam	(i) Second Class Secondary School Control	
	18 to 35					,		7.	years.	201035	- <del></del> -	<del></del> -				n jeans.	<del></del>	-	\
	(a) Forty per cent by initial recruitment; and	years service as such and having qualification	By promotion, on the basis of senionity-cum-	person for promotion, then by initial recruitment.	Note: In case of Ton constitution	and :	basis of seniority-cum-fitness, from	(b) twenty-five per cent by promotion on the	recruitment; and								2) By initial recruitment	.[	

recruitment of Certified Te		recognized	from a	Degree	Bachelor's	<u>e</u>		-   
at least five years service and high					şi î j			
the Primary School Head Teachers		is et,	Center; or	Institute or	Vocational Institute or Center; or	• •	-	
of seniority-cum-fitness, from ani		. Téchnical	l or Govt.	t Industria	Government Industrial or Govt.			-
(b) sixty percent by promotion, on the	:	from any	subjects		relevant technical;	, g.d.		(BPS-15).
	years.	years training in the	years trair	with, two	. University with two	•		(Industrial Arts)
(a) Forty per cent by initial recruitment;	18 to 35 (	recognized	from a	Degree	Bachelor's	(E)	٠.,	Certified Teacher
recruitment.		- 43				-		
person for promotion, then by		1				. 1,,		
Note: In case of non availability of su	· 					·		
	•	2 / 1		; ; .•			.,	
Certified Teacher (General).								<b>T</b>
prescribed for initial recruitmen		* .			***			
service and having qualific		٠ ١٠						
School Teachers with at least five		•						
fitness, from amongst Senior Pr		-1						٠ ـ
promotion on the basis of seniority								
transfer, then the posts will be fill	<del></del>							
Primary School Head Teachers								
candidate is available amongst								
Provided that if no su						_		-
(General):								
recruitment of Certified Te						_		
qualification prescribed for								
						_		
the Primary School Head Teachers			p.	n Education	months Diploma in Education.	10:ELT		
of seniority-cum-fitness, from an		or eighteen	1 University	recognizes	Education from a recognized University or eighteen	Edu		
(b) sixty per cent by promotion, on the		Degree in	Associate	two years	Certificate or t	Cer		
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		15.				
		Certified Teacher (Agriculture) (BPS-15).	1	**		
(îi		er				
iii) Bachelor's Degree from a recognized	Center with spine months training from Government institute or center with spine months training from Government; Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or Gencher Agriculture as one of the subject, from a recognized University: or	~ , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	in the second second	1.	Teacher, Agro technical (Industrial Ans).	
		18 to 35	÷			
Provided that if no suitable candidate is available amongst the	(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):	(a) Forty per cent by Initial recruitment; and	٧ 1 ه	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).	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.	(Industrial Arts):

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			Drawing Master (BPS-15).	
			(cr ::	
			Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	University with one year vocational training from any Government training center or insultate with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).
	·		18 to 35 years.	ung or on ited
Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.	basis of semority-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:  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.	(b) twenty per cent by promoti-	(a) Eighty per cent by initial recruitment; and	Note: In case of non availability of suitable person for promotion; then by initial recruitment.

(38)

By promotion, e <b>filmess, from ame</b>		1		Teacher (BPS-14).	3
recruitment of Pri				Son or Discourse on the plant	_
having qualific		•••			
Teachers with a			-	(BPS-15).	
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By promotion, o	1			Primary School Head	5
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Note: In case of					<del></del>
Teacher.			-		
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amonesi	. ::::::::::::::::::::::::::::::::::::	•	qualification.		e per-
(b) twenty p	_		course or Army equivalency or	,	•
	_		with one year junior D	Teacher (BPS-15).	. •
(a) Eighty Fo	18 to 35	from a recognized University	Bachelor's Degree fro	Physical Education	
	`	*			

er cent by initial recruitment; and

scruitment of Physical Education ing qualification prescribed for with at Idast five years service ber cent by promotion, on the the Primary School seniority-cum-fitness, Head from

The party

ing qualification prescribed for cruitment of Physical Education e is available for promotion then rovided that if no suitable nongst Senior Primary School with at least five years service basis of seniority-cum-fitness,

e for promotion, then by initial of non-availability of suitable

fitness, from amongst Primary School Teachers at least ten years service and teation prescribed for initial on the basis of seniority-cumrimary School Teacher. **mo**ngst Senior Primary School on the basis of senionty-cum-

	22.			7) Jan.
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	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution.	(ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or	1 .
	18 to 35 years.		18 to 35 years.	
	to 35 By initial recruitment.	·····	By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.	with at Just five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.

- 12



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

_					•	•	
MEMUERD	Oiner MAJAISCALEd! MA Edu	M.A Arabic I Shahdatul Alemia Fitt Uloomul Arabia wal Islamia from a recognized Tarzimuatul Wafaqul Madaris	BAUBOC	n.xc	330	гласановах Упаписонов	Arabic Teacher
Marks = 05	Marks obtained X 15 / total marks =	Mark obtained X 20 I total marks =	Marks obtained 'X,20 / total marks =	Marks obtained X 20 total marks =	Maris obtained X 20 / total marks	Total Marks: 100	

## Theology Teacher

category of Qualification	Total Marks 100
SXC	
1200	Marks obtained X 20 / total mark: =
nost	Marks obtained X20/total marks =
B.//BSc	Marks obtained X20 / total marks =
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	MPhillphin	MANASCIACE	BA/BSc \$	histitution.	Oitt Sound for	SSC	Category of Qualification	
Marks = 05	Marks obtained X 15 / total ma. As =	Marks obtained X 20 / total marks =	Marks obtained: X 20 / 101al marks =	Marks obtained X 20 / total marks =	Marks obtained X 20 / total marks =	CONTENT TO THE PARTY INC.	Total Marie 100	

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

ARASCALEA/AI4 Edu	n Edivation	HSSC B.J.TSSc	SVC.	Category of Qualification
Marks obtained X 15 / total marks = Marks = 05	Marks obtained X201 total marks =	Marks obtained X 20 / total marks	Total Marks 100 For Humanities group at Intermediate/Graduation Level	
	a communication of the selection	5 Extra marks for FSc, 5 Extra marks for B.Sc end 5 Extra marks for M.Sc will be added to the total score obtained by a condition	Feer Candidate of Science group	3



## (M)

## Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
500		
330	Men'ks obtained X 20 / 1010! morks =	5 Extra marks for FSc, 5 Extra marks for B Sc and
		5 Extra marks for MSc will be added to the total
HS3C	Marks objeined X 20 / solal marks =	score obtained by a condidate during his selection
BA/BSc .	Marks obtained X 20 / total marks =	•
LLA Certificate	Marks obtained X20 / total marks =	مرد عل
MAMSOM Ed / MA Edu	Marks obtained X 15 (total marks =	,
MPhil/PhD	Marks = 05	

## Physical Education Teacher

Category of Qualification	Total Murks 100	For Candidate of Science group
(60)		
650	Alarks obtained $X 20$ / total marks =	5 Eura marks for FSc. 5 Euro marks for B.Sc and
110000		5 Extra marks for M.Sc will be added to the total
ELONG".	Marks obtained X 20 / total marks =	some obtained by a condiduce during his solection
D 1000		
<i>B</i> ,37.23.6	Marks obtained X 20 / total marks =	
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dien or nguvatait Certificate	Mintes obtained X20 Hotal marks =	ب
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### PST Certificate/ Diploma in Adarks obtained X 20/total marks =   ##################################
Norks obtained X 25/total marks =  m/ADE.  NATEd / MA Edu Marks obtained X 20/total marks =  hD  Marks = 05
<u>                                     </u>

## 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 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 verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.

In case a document(s) islare found fake! forged! bogus upon scrutiny! verification, the service of the teacher concerned shall be terminated and the amount merit list after making necessary corrections while addressing the observations/objections/oppeals, followed by requisite appointment orders.

Deni Asxad from recognizad Tazemat-ul-Wafaqut Madaris, Darul Uloom Saidu Sharif Swat, Darul Uloom Charlegh Swat, Darul Uloom Chital, Darul paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgory fraud under the relevant law.

appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be. 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



Professionary disclaims the 24th 1999, 2015.

4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 1911,2013, the following feetless amondments shall be made nonvigo Notification hereby directs that in this Department's Notifications No.80(G)S&L1/+28/2009/Vol-II detect, 00-01/2004 and Secondary Education Department in consultation with the Establishment beparement and the Finance Department rule 3 of the Khyber Pakhambinea Civil Servants (Appointment, Promotion and Transfer) Rules, 489, the Elementary No. 30(PD)4-5/SSLO/Meeting/2013/Beaching/Cudror in pursuance of the providens contained in sub-rule (e) of No.SO(G)S&L/1-69/06/Pala/DPEZLIB dated, T.S. A. E. Miller (1)(() Worlds don **"在我们的是是**"

## VALIMINATION

## In the Appendix,

Serial No. 1 shall be ranumbered as 1B and before Spijal No. 1B, as so remark ned the following van emisses skall he inserted in raspective columns, namely: inserted in respective echimins, namelu:

(a) Fifty percent by promotion, on the b	grans grans	At least second class Muster's Degree in 22 35 Physical Education from a recognized years
(10) <b>hay percent</b> by initial remainment.		
(II)		

1-4

Director Physical

Education (BPS-17)

University.

(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and inving qualification mentioned in column No. 3:

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

Note: If no suitable candidate is available in the relevant vadres of the above teachers, the post falling in their promotion quora shall be filled by initial recruitment, and

(b) fifty percant by initial recruitment and

against Serial No. 1 B, as so renumbared, for the visiting contains, he tolerwing South the suite stitute of the street of the second

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•					-1			malifications from a recognized	Education)	Education (Industrial Art or	tion or Master of	and		as compulsory subject;	groups at degree level with English	(c) (Humanities and other equivalent	ند .	Or .	(b) (Physics, Maths "A" or "B" or Statistics)	Or	(a) (Chemistry, Botany or Zoology), 🐳	following groups with two subject	University on need basis from the	Degree's from a recognized	I. At least second class Bachelor	C.
••					1	7. H		15 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			<u>- 19.,</u>	<i>i</i> .	11, -1				,							years.	21 to 35	414
column No.3:	having quali	Musters and	fire years ser	Drawing Mast	(b) four per cent	column No. 3:	having qual	ut least five y	from amongst	on the basis	then the post s	Senior Certific	amdidate is	Eroent	‡	column No.3:	having qua	Teacher and	fine years s	Cartified Teac	(a) forty per cer		district concern	busis of senic	T. Secundy Fine pe	

Seventy have per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:

forty per cent from amongst the Senior Curtified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Treacher and having qualification mentioned in column No.3:

Provided that if no suitable condidate is available from canongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-filness, from amongst Certified Teachers, with at least five years service as such and basing qualification mentioned in column No. 3:

) four per cent from amongst the Senior Drawing Masters(BPS-16), with as least five years service as Senior Drawing Masters and Drawing Masters and Drawing Masters and Column Mo.3:

Candidate is cardiable from amongst Senior Drawing Masters for promotion than the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Mesters with at least five years service as such and having qualification mentioned in column No. 3;

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

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

(d) There yer cent from amorized the Service is Theology Teachers (BPS-16), with a treast five years sorvice as Series. The despy Teachers and Theology Teachers and training seath solven.

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

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

Provided that if no suitable candidate is

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

d) four per cent from amongst the senior Theology Teachers (BPS-16), with atleast five years service as Senior Theology Teachers and Theology Teachers and paulification mentioned in column.

Provides 1

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

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

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority cum-funess, from Quris with at least fivr

Primary School Head Teachurs (BIS-12), with at least seven years service as intimary School Head Teachurs (BIS-12), intimary School Teachurs and horioc tradification randoned in Johnna Volger

years scrvice as such and having qualification mentioned in column No. 3,

(3)

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

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

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

f) twenty percent from amongst the Primary School Head Teachers (BPS-12) with at least seven years service as Primary School Head teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

column No.3: and having qualification mentioned in service as Senior Primary School School Teachers with at least seven years Trachers and Primory School Trachers promotion, on the basis of seniority cum prinancina then the post shall be filled but fitness, from amongst Senior Primury Limity Tomal Bond Frances

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

(ii)recrutment. twenty five percent by initial

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11. Posts of General SST and SSTs-1 Science and SST-2 Science shall be atted by promotion or intime edecated prod basis separately.

qualification mentioned in column No.3:and Primary School Teachers and having service as Senior Primary School Teachers School Teachers with a t least seven years promotion, on the basis of Seniority Cum promotion then the post shall be filled by fitness. from amongst Senior Primary Primary School/ Head Teachers

qualification mentioned in Column No3. seven years service as such and having then the post shall be filled from amongst candidate is available from amongst Senior Primary School Teachers with at least Primary School Teachers for promotion Provided further that if no suitable

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Note: in the relevant cadre of the above teachers, the post falling in their If no suitable candidate is available nitial recruitment. promotion quota shall be filled by

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Science and SST-2 Science shall be Posts of General SST and SSTs 1

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# Endst : of even No & date.

The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Abnicistration Department Peshqueer

The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar

The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar

The Accountant General Khyber Pakhtunkhwa Peshawar.

The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshewar

The Director of Education (FATA) Peshawar.

The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbaitabad

The Director, (PITE) Khyber Pakhtunkhwa Peshawar.

10. The Director, ESRU Elementary and Secondary, Education Department Khyler Pakhturkhwa Pesheuver

11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar

12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhunt Pashannar 13. All District Education Officer (M&T) in Khyber Pakhtunkhwa.

14. All District Account Officer in Khyber Pakhtunkhyya.

15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.

17. PS to Governor Khyber Pakhtınkhwa. Peshawar.

18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar

19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar

20.PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar

21. PS to Secretary E&SE Khyber Pakhtunkhwa.

22. Master file



Endst of even No & Date



# SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

- 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.
- 1. The Khyber Pakhtunkhwa, Public Service Commission Peshawar.
- 5. The Accountant General Khyber Pakhtunkhwa Peshawar.
- 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.
- The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
- 10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar
- 11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
- 12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkwha Peshawar.
- 13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
- 14. All District Account Officer in Khyber Pakhtunkhwa.
- 15. All Agency Education Officer in FATA.
- 16. All Agency Account Officer in FATA.
- 17. PS to Governor Khyber Pakhtunkhwa, Peshawar.
- 18. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar.
- 19. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar, 20. PS to Minister F&SF Khyber Pakhtunkhwa, Dechamar,
- 20. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.21. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.
- 22. Master File

Zamin Khan Momand Section Officer (Primary)

#### SUBJECT PROMOTEION FROM PSHITE OF THE STAND FROM PSILIO SPSTEIZEPSHTAS

Memo de la company de la compa

ATTESTED



PFICE OF The District Education Officer Hassan Khel Sub division Peshawar. Bacha Khan Chowk Peshawar. Ex-APA FR Peshawar office Phone No. 091-9210145 mail Add: <u>fr\_pashawar@yahoo.com</u>

#### **NOTIFICATION**

In pursuance of the Director Education NMDs Khyber Pakhtunkkhwa Letter No. 19297-310/1:-7/1:-6/up-gradation dated; 04.12.2017 and consequent upon the recommendation of the Departmental Promotion Committee. The following feMale PSHT in HSD Peshawar are hereby Promoted to the post of Regular CT (Gen) (BPS-15) Rs.(16120-1330-56020) plus usual allowances as admissible under the rules on regular basis the existing policy of provincial Government in teaching Cadre on terms and condition given below with effect from 11.07.2020

5.#	5.L.#	Name of	ed against their		<del></del>	<del></del>
		Teachers	F/Name	DOB	Name of school	Adjusted at:-
1.	24	Naseom ®	Sher Dad Sheh	01-01-73	GGPS Rehman Shah	GGM5 Rehman Shah
2.	45	Shehida	Noor Muhammad	21-09-77	GGPS Noor Damer	GGMS Barki No.2
3.	50	Basral Mir	Mir Hawas Khan	03-02-83	GGPS Hukam Khan	GGMS Abdul Badshah
١.	57	Karishama &	Mir Hawas Khan	05-06-83	GGPS Alab Khan	GGMS Abdul Badshah
.	58	Hina Tabassum	Jahan Zalb	01-05-85	GGPS Barkl No.2	GGMS Barkl No.02
.	66	Foria Aziz	Aziz Khan	01-05-85	GGPS Malik Hasham	GGMS Muzaffar Kilil

They will be on probation for period of one year extendable for another one year.

They will be governed by such rules and regulations as may suc from time to time by the

Their Services can be terminated at any time. In case his performatice is found unsatisfactory during probation period. In case of misconduct he will be preceded under the rules framed time to time.

Charge Report should be submitted to all concerned. 5.

Their Inter-se-Seniority on lower post will remain intact. 6,

No T.A/D.A is allowed for joining his duty.

They will give an undertaking to be recorded in their service book to effect that if any over payment has made to them in light of this order will be recovered and if they are wrongly prompted he will be reserved.

> (Abdur Rauf Shah) District Education Officer . Hasson Rhel SD Peshawar

Endst: No./2 78\_85 Dated 20 17 /2020 Copy to the: .

Director Education E&SE Khyber Pakhtunkhwa Peshawa

Additional Director Edu. NMDs Khyber Pakhtunkhwa Peshawar.

2. 3. 4. Accountant General Khyber Pakhtunkhwa.

Principal/ Hoadmistress concerned.

ADEO(F) HSD Peshawar.

Teachers concerned.

EMIS Coll. Office Record.

> District Edycation Officer Hassan Khel SD Peshawar

969

### HIGH COURT PESHAWAR

Writ petition No 3453 / 12020

GH COUPY PESHALL

Khadija Bibi W/o Muhammad Kifayat Ullah, PST, GGPS Muhammad Gul Killi Hassan Khel Sub Division (HSD) Peshawar

.....Petitioner

#### VERSUS

- Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- Secretary Elementary & Secondary Education
   Khyber Pakhtunkhwa Peshawar.
- Director Elementary & Secondary Education.
   Near Govt Higher Secondary School City NO 1
   Peshawar.
- 4. District Education Officer Hassan Khel Sub Division (HSD) Peshawar.

.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF

THE CONSTITUTION OF ISLAMIC

REPUBLIC OF PAKISTAN, 1973 AS

AMENDED UP-TO DATE BY DECLARING

FILED TODAY
Depthy Registrar
2 7 JUL 2020

EXAMINER Peshawar High Court



TO BE DECLARED SO. PRINCIPAL OF POLICY, AND THE LIABLE CONSTITUTION, AGAINST THE **FUNDAMENTAL RIGHTS AS ENGHRINED IN** THE AGAINST DISCRIMINATORY, VS IFFECTY BPS-15 TEACHER TO THE POST OF PHYSICAL EDUCATION TEACHER (PST) BPS-12 FOR PROMOTION INCLUSION OF THE PRIMARY SCHOOL DEPARTMENT TO THE EXTENT OF NON-MEKE ISSUED BY THE RESPONDENTS PROMOTION & TRANSFER RULES 1989 THROUGH WHICH THE APPOINTMENT, THE NOTIFICATION DATED 13.11.2012

#### Prayer in Writ Petition:

It is therefore, most humbly prayed that on acceptance of this Writ Petition, an appropriate writ may kindly be issued by declaring non-inclusion of the Primary School Teacher (PST) BPS-12 for promotion to the post of physical education promotion to the post of physical education

) (61)

the fundamental rights as enshrined in the constitution, against the principal of policy, and be liable to be declared so and the impugned notification dated 13.11.2012 through which the Appointment, Promotion & Transfer Rules 1989 were issued by the Respondents department may kindly be declared illegal and discriminatory to that extent by directing them to insert the post of PST BPS-12 for promotion to the post of PET BPS-15.

#### Respectfully Sheweth:-

#### The Petitioner humbly submits as under:-

That Petitioner is a bonafide resident of 1. Hassan Khel Sub Division Peshawar qualification of Intermediate having and Primary Teaching Certificate (PTC) appointed as Primary School Teacher upon the selection of the Departmental Selection Committee in Community School Hassan Khel Sub Division Peshawar, vide appointment Order dated 25.00.2009. (Copy of Education Documents and Appointment Order are attached as annexure A)



- 2. That later on the Petitioner has improved his qualification by getting Degree of Bachelors of Arts in year 2011 and on the basis of which; the services of the Petitioner was regularized vide order dated 21.01.2013. (Copy of BA Degree and Regularization Order dated 21.01.2013 are attached as annexure B & C)
- 3. That the Petitioner has further improved her qualification by getting Master Degree in Islamiat, B.Ed, Certificate of Teaching (CT) and also having Diploma in Physical Education. (Copy of Degrees and Certificates are attached as annexure D)
- 4. That the Respondents through notification dated 13.11.2012 in exercise of power under sub-Rule 2 of Rule 3 of KP Civil Servant (Appointment, Promotion and Transfer Rules 1989) laid down the method of recruitment, qualification and other condition further post of different School Teacher as specified in the notification ibid. Through this notification promotion to the post of Physical Education Teacher (Petitioner) BPS-15 was laid down through which



- (a) Eighty percent by initial recruitment and,
- (b) Twenty percent 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.

Provided that if no suitable candidate is available for promotion then on the basis seniority-cum-fitness from Senior Primary School Teachers with at least five service years and having qualification initial prescribed for recruitment of physical Education Teacher. Through notification dated 24,07,2014, further amendment were made in the above

said rules and for promotion to the post of Secondary School Teacher (SST) BPS-16, proviso was asserted therein through which Primary School Teacher (BPS-12) having seven year service were made eligible for promotion to the post of SST BPS-16, provided if no suitable candidate was available from amongst Senior Primary School Teacher. The same is reproduced for ready reference:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion

then the post shall be filled from amongst Primary School Teachers with at Least seven years service as such and having qualification mentioned in column No 3.

The above said provisions would show that the Primary School Teacher BPS-12 was made eligible for promotion to the post of SST BPS-16 but on the other hand PST BPS-12 having qualification of Diploma in Physical Education was not eligible for promotion to the post of PET BPS-15 which is discriminatory and is against the fundamental rights of the Petitioner. (Copy of the Notification dated 13.11.2012 & Notification dated 24.07.2014 are attached as annexure E & F)

- 5. In order to further simplify the issue the following chart will assist this Hon'ble Court for reaching just and appropriate decision.
  - i. PSHT BPS-15
  - ii. SPST BPS-14 SST BPS-16
  - iii. PST BPS-12

Meaning thereby that the PST BPS-12 was made eligible for promotion to the post of BPS-16.

iv. PSHT BPS-15

SPST BPS-14 PET BPS-15

Meaning thereby that PST BPS-12 was not eligible for the post of PET BPS-15.

- 6. That the Respondent No 4 requested Respondent No 3 for availability of the Representative for promotion from the post of PSHT to CT-15, DM-15, PET-15 and from PST to SPST-14, PSHT-15, the DPC meeting has been held and Teacher have be promoted. (Copy of the Letter and Notification are attached as annexure G)
- 7. That in the whole Sub Division Hassan Khel there is no PSHT, SPST & PST having qualification of Diploma in Physical Education except the Petitioner but since in the Rules there is no avenue for promotion to the post of PET from PST having qualification of Physical Education, therefore no promotion is to be effected to PET BPS-15. Consequently the post left out from promotion will be advertised for initial recruitment.
- 8. That the Petitioner having no avenue for promotion to the post of PET BPS-15 in the Rules, being highly aggrieved wherefrom,

having no other adequate, efficacious and alternate remedy available but to approach this Hon'ble Court, inter alia on the following grounds:

#### GROUNDS:-

- A) That the Petitioner is a natural born citizen of Islamic Republic of Pakistan, belonging from Hassan Khel Sub Division Peshawar and is fully entitled to all the basic and fundamental rights as enshrined in the constitution and interpreted and guaranteed by the law of the land.
- B) That the petitioner has not been treated in accordance with law and the rights of the petitioner for promotion have been violated which is not permissible in law and Article 9 read with Article 18 of the Constitution of the Islamic Republic of Pakistan 1973, therefore directions is required to the Respondents for insertion in the Rules for Promotion of PST having qualification of Diploma in Physical Education to the Post of PET BPS-15.
- C) That the fundamental right of the Petitioner has blatantly been violated by the Respondents and the Petitioner and other

candidates having qualification of Diploma in Physical Education has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.

- D) That the Petitioner fulfilled all the criteria provided for the post of PET in question but since in the Rules the PST having qualification of Physical Education have been excluded in the Rules, therefore the same non inclusion in the Rules is against the Article 25, 25-A, 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- That the petitioner is holding the prescribed qualification for promotion against the post of PET, besides she has at his credit the higher qualification of M.A degree, B.Ed, CT and Diploma in Physical Education, however in the Rules on one side the PST BPS-12 has been made eligible for the post of SST BPS-16 but on the other hand PST BPS-12 having qualification of physical education has been made ineligible for the post of PET BPS-15, which is against the provision of the Article 3 & 4 of the Constitution of Islamic Republic of Pakistan, 1973 thus may be declared so.

F) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

#### PRAYER:-

It is therefore, most humbly prayed that on acceptance of this Writ Petition, an appropriate writ may kindly be issued by declaring non-inclusion of the Primary School Teacher (PST) BPS-12 for promotion to the post of physical education Teacher BPS-15 as illegal, discriminatory, against the fundamental rights as enshrined in the constitution, against principal of policy, and be liable to be declared the impugned notification dated 13.11.2012 through which the Appointment, Promotion & Transfer Rules 1989 were issued by Respondents department may kindly be declared illegal and discriminatory to that extent by directing them to insert the post of PST BPS-12 for promotion to the post of PET BPS-15.

Any other relief, not specifically asked for may also graciously be extended in favour of the petitioner in the circumstances of the case.

#### INTERIM RELIEF:-

By way of interim relief, the Respondents may be directed to retain one post of PET BPS-

F) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

### PRAYER:-

therefore, It is humbly most prayed that on acceptance of this Writ Petition, an appropriate writ may kindly be issued by declaring non-inclusion of the Primary School Teacher (PST) BPS-12 for promotion to the post of physical education Teacher BPS-15 as illegal, discriminatory, against the fundamental rights as enshrined in the constitution, against principal of policy, and be liable to be declared the impugned notification dated 13.11.2012 through which the Appointment, Promotion & Transfer Rules 1989 were issued by the Respondents department may kindly be declared illegal and discriminatory to that extent by directing them to insert the post of PST BPS-12 for promotion to the post of PET BPS-15.

Any other relief, not specifically asked for may also graciously be extended in favour of the petitioner in the circumstances of the case.

### INTERIM RELIEF:-

By way of interim relief, the Respondents may be directed to retain one post of PET BPS-

15, till the final disposal of the instant writ petition.

Petitioner

Through:

NASIR WEHMOOD

Dated:- 23.07.2020

Advocate, Supreme Court of Pakistan

### CERTIFICATE:-

No such like petition has earlier been filed by the Petitioner before this Honourable Court on the subject matter.

### LIST OF BOOKS:-

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other book as per need

ATIVOCATE



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### PESHAWAR HIGH COURT, PESHAWAR

•	FOR	M OF ORDER SHEET	(5	ر ارد	***	20
Date of Order of Proceedings	Ord	er or other Proceedings with Signature of Judge.	19	-	عدالت عا بشادر	ν π ω/
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ORDER 25.08.2020	Writ Petiti	ion No.3453-P/2020 with Interim Rel	<u>ief</u>	6	*	
,					i .	
	Present:	Mr. Nasir Mehmood, Advocate for Khadija Bibi, petitioner.				
		****				

QAISER RASHID KHAN, J.-The petitioner, through the instant writ petition, has prayed for declaring the notification dated 13.11.2012 of respondent No.2 to be nullity in the eye of law and of no legal effect whereby the post of Primary School Teachers (BPS-12) has not been included in the relevant rules for promotion to the post of Physical Education Teacher (BPS-15).

During the course of brief submissions, when it 2. was pointed out to the learned counsel for the petitioner that the relief, sought through the present petition, falls within the exclusive jurisdiction of the Khyber Pakhtunkhwa Service Tribunal, he requests for treating the present petition as an appeal and sending it to the Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education,





Peshawar for its disposal.

Accordingly, we while disposing of this writ petition, treat it as an appeal of the petitioner before the Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education, Peshawar and direct him to decide the same in accordance with law. The office is directed to send this petition to the aforesaid authority by retaining a copy thereof for

record.

Announced. 25. 08. 2020

SENIOR PUISNE JUDGE

JUDGE

CERTIFIED TO BE TRUE CO

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Date of Presentation of Application.

No of Pages

Total----

Date of Preparation of Copy.

Date of Delivery

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(Favaz)

(D.B.) Justice Qaiser Rashid Khan & Justice Ijaz Anwar

### DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENTKHYBER **PAKHTUNKHWA**

### **NOTIFICATION**

- WHEREAS, the appellant namely Mst Khadija Bibi is serving as PST (BS-12) at Govt. Girls Primary School Muhammad Gul Killi, Sub-Division Hassan Khel (Ex-FR Peshawar.
- AND WHEREAS, the Departmental Promotion Committee has not promoted the teacher concerned to the post of PET as she was not eligible for promotion under policy November 13. 2012. The Policy for promotion to the post of PET is reproduced as below;

Nomenclature of the post	Minimum qualification and experience for initial appointment or by transfer	Age Limit	Method of recruitment
Physical Education Teacher (BPS-15)	Bachelor's Degree from recognized University with one year Diploma in Physical Education Course or Army equivalency or other equivalent qualification.	18-35	(a)Eighty percent by initial recruitment, and (b) Twenty percent by promotion on the basis of seniority cum- fitness, from amongst the primary school Head Teacher with at least five years service and having qualification prescribed for initial recruitment Physical Education Teacher.  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 ad having qualification prescribed for initial recruitment of Physical Education Teacher.  It in case of non-availability of suitable candidate for promotion, then by initial recruitment.

- AND WHEREAS, feeling aggrieved, Mst. Khadija Bibl filed W.P No. 3453-P/2020 case titled Khadija Bibi VS Govt. of KPK & Others, in the Honorable Peshawar High Court Peshawar with the prayer that " It is therefore, most humbly prayed that on acceptance of this writ petition, an appropriate writ may kindly be issued by declaring non-inclusion of the Primary School Teacher (PST) BPS-12 for promotion to the post of physical education teacher BPS-15 as illegal, discriminatory, against the fundamental rights as enshrined in the constitution, against the principles of policy, and be liable to be declared so and the impugned notification dated 13-11-2012 through which the appointment, promotion & Transfer Rule 1989 were issued by the respondents department may kindly be declared illegal and discriminatory to that extent by directing them to insert the post of PST BPS-12 for promotion to the post of PET BPS-15, the same was decided vide judgment dated 25.08.2020 with the directions to the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa for decision in accordance
- AND WHERAS, the petitioner has been provided opportunity of personal hearing who apprised the Committee regarding her grievances, upon which The ADEO (Litigation), Hassan Khel Sub-Division provided record pertaining to her grievances

Now therefore, in compliance of the Judgment dated 25-08-2020 of the Honorable Peshawar High Court Peshawar, & having gone through the whole case record along with consulting the relevant provision under Section-21 of General Clauses Act 1897 as amended in 1956, read with APT Rules 1989 & in exercise of the powers conferred upon the undersigned in a capacity of an Appellate Authority, the Departmental Appeal of the petitioner is hereby stand rejected as she was not eligible for promotion under policy November 13, 2012.

> DIRECTOR, (E&SE) Department Khyber Pakhtunkhwa, Peshawar.

Endst: No: 3810-15 Dated Peshawarthe 9103/2021

Copy forwarded for information & n/action to the: -

- Additional Registrar Judicial Peshawar High Court Peshawar.
- Addl: Advocate General Peshawar High Court Peshawar
- District Education Officer (M) Sub-Division Hassan Khel.
- Section Office (Lit-I), Elementary & Secondary Education Department KP.

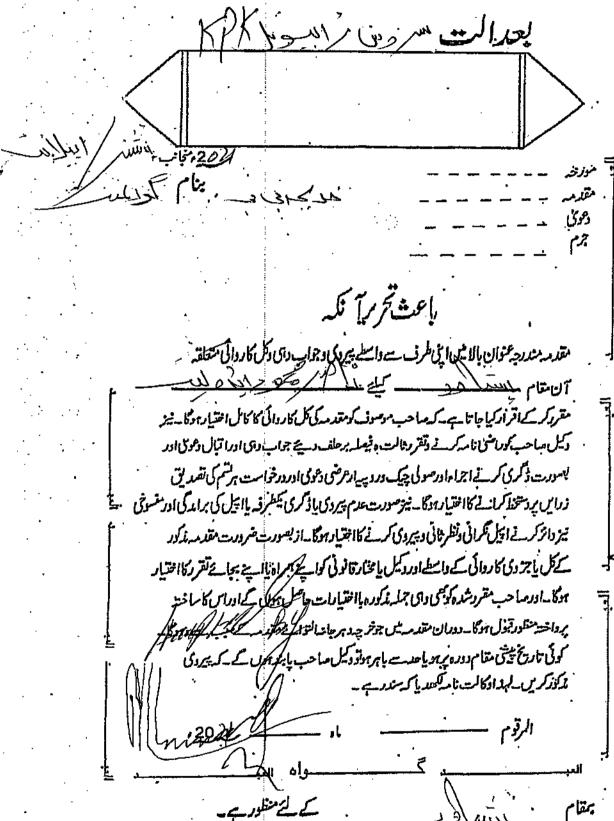
Mst Khadija Bibi serving as PST (BS-12) at Govt. Girls Primary School Muhammad Gul Killi, Sub-Division Hassan Khel (Ex-FR Peshawar.

PA to Director local office.

Děpútý Director (Estab)

Merged Areas 32





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### BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 4755/2021

Mst: Khadija Bibi PST GGPS Muhammad Gul ......Appellant

### **Versus**

District Education Officer (F) Peshawar and others..... Respondents.

### **INDEX**

S.No	Description of State	Annex	Page No.
01	Para wise Comments		01-02
02	Affidavit	********	03
03	Authority Letter		4
04	Copy of rules regulation and policy dated. Nov 13, 2012	Annexture A	5-19
05	Copy of Departmental Appeal Dated. 19.03.2021	Annexture B	20

District Education Officer (Female) Peshawar

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### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

### **PESHAWAR**

Service Appeal No. 4755/2021

Mst: Khadija Bibi PST GGPS Muhammad Gul...... Appellant

### Versus

District Education officer (F) Peshawar and other.....Respondents.

Comments on behalf of respondents No.03 and No. 04.

### Preliminary objections.

- That the appellant have got no cause of action, locus standi to file the instant appeal.
- That the appeal is not maintainable.
- That the appellant has not come to this Court with clean hands.
- That the appellant has concealed material facts from the honorable court.

### Respectfully Sheweth.

- 1. Pertain to record.
- 2. Correct to the extent of appointment as PST, however, it was a project post purely on temporary basis during project period.
- 3. That the appellant was re-appointed by the respondent department in the year 2013 on contract regular non pensionable basis.
- 4. Subject to record.
- 5. Correct to the extent that in notification Nov 13, 2012 the method of recruitment and promotion was laid down by the E&SE with consultation of Establishment and Finance department.
  - Further amended in the (APT) rules were made in 29.07.2014 for specific subject and not for all
- 6. The amendment was made in PST BPS-12 for the promotion to the post of SST due to less no of teachers for promotion in PSHT, SPST especially for SST (Science Groups)
  - This amendment was not made for the promotion of PET.
- 7. Correct to the extent that a representative was compulsory for DPC meeting. After completion of process, the orders of the promotee teachers were issued.
- 8. Incorrect. The DPC meeting was for both male and female. In male there was a PSHT teacher who was promoted while there was no female PSHT, SPST teacher for promotion to the post of Physical Education Teacher (PET). Hence the post was advertised for initial recruitment.
- 9. The provisions contained in sub rule 2 of rule 3 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and is supersession of all notifications issued in this, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department laid down the method of recruitment, qualification and others conditions which is applicable to all the posts including PET which is specified in the notification No. SO(PF)-4-5/SSRC/Meeting/2012(Teaching Cadre) dated. 13.11.2012. (Copy of the rules, policy is attached as Annexure "A".





- 10. Incorrect. In compliance to the judgment of the honorable High Court Peshawar Dated. 25.08.2020 in W.P No. 3453-P/2020 the respondent No 3 being appellate authority gone through the whole case and rejected the appeal of the appellant according to the rules and policy. (Copy of the decision of the departmental appeal is attached as Annexed "B").
  - 11. This para is legal and need no reply.

### **ON GROUNDS**

- A. Correct to the extent that every citizen have equal rights and opportunities according to constitution of Islamic Republic of Pakistan. The respondents being bound by the rules regulations made by the Govt from time to time.
- **B.** Incorrect. The appellant has treated according to rules, law and policy and no rights of the appellant has been violated.
- C. Incorrect. The respondents no 03 being bound by law, rules and policy, having gone through the whole case/appeal and decided it according to the rules laid down by the Govt for the post of (PET)
- D. Incorrect. The respondent's No. 03 and 04 are bound by law, rules and policy and while doing the whole process, no rights of the appellant has been violated. The appellant has the diploma of Physical Education teacher but she does not fall on criteria which is needed for promotion to the said post.
- E. As elucidated in para D.
- F. Incorrect. The appellant is having the prescribed qualification but the post PST BPS-12 in which she is working not allowing her to promote to the post of PET. PSHT BPS-15 and SPST BPS-14 are allowed but PST BPS-`12 is not allowed for promotion to the post of (PET) under the existing rules and policy.
- G. This para is legal and need no reply.

### PRAY.

In light of the above cited facts and legal position it is humbly prayed that the case of the appellant may kindly be dismissed.

E&SE Knyber Pakhtunkhwa

Peshawar

E&SE Khyber Pakhtunkhwa Peshawar District Education Officer (Female) Peshawar

### **BEFORE THE SERVICE TRIBUNAL PESHAWA** R

(3)

Service Appeal No. 4755/2021

Mst. Khadija Bibi PST GGPS Muhammad Gul.....Appellant

Versus

DEO (F) Peshawar and others.....Respondent

### **AFFIDAVITE**

I Muhammad Haroon Assistant District Officer (Lit) HSD Peshawar do hereby solemnly affirm and declare that the contents of the accompanying para wise comments submitted and correct to the best of my knowledge and belief nothing has been concealed from this honorable court.

**Identified By:-**

Additional Advocate General Service tribunal Khyber Pakhtunkhwa Peshawar

Deponent

Mr. Muhammad Haroon CNIC: 17301-8609968-1

Mobile: 0330-5165571

ATTESTEU

ig. 201

### **AUTHORITY LETTER**

Mr. MUHAMMAD HAROON Assistant District Officer (Litigation) Hassan Khel Sub Division Peshawar (Ex-FR) having CNIC No. 17301-8609968-1 of the District Education Officer (F) Peshawar (do here by authorized for court cases on the behalf of District Education officer (Female) Peshawar.

District Education officer

(F) Peshawar



# ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT Government of the kayper pakhtunk

Pėshawar, duted the November 13,2012

said Appendix and the schedule therewith 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 Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance-Department hereby lays down the method of recruitment, 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

Endst. No. ⊜ Date as above

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCA ION DEFARTMENT.

Copy forwarded to:

The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.

The Secretary to Govt. of Khyber Pakhtunkhwa, Law Departmen

The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.

fhe 'Accountant General, Khyber Pakhtunkhwa Peshawar

The Director (E&SE) Khyber Pakhtunkhwa Peshawar

The Director Education (FATA), Peshawar

13. All Exercitive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa. 12. All Distric 10. The Desprise ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar, or Curriculum & Teachers Education Abbottabad. ordination Officers in Khyber Pakhtunkhwa.

16. P.S to Governor, Khyber Pakhtunkhwa. c) Education Officers FATA ic Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.

18. P.S to Chief Secretary, Khyber Pakhtunkhwa. 17. P.S to Chid Minister, Khyber Pakhtunkhwa.

20. PS to Seardary E&SE Department. 19. PS to Nainiser E&SE Khyber Pakhtunkhwa Peshawar.

Section Officer (Primary)

### APPENDIX

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						<u>;</u> -	S.No.	
					Secondary School Teacher (BPS-16).	2.	Nomenclature of the post.	•
			(E)		9			
			M.A in Education or Bachclor's Degree in Education, from a recognized University.	and other equivalent groups from a recognized University; or	Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Statistics Humanities		Minimum qualification and experience for initial appointment or by transfer.	
			,	·	years.	4.	Age limit.	
~					(a)			
(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;	(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;	Economics) with at least five years service as such and having qualification mentioned in column No. 3;	Teachers (A Teachers (Indu rtified Teache	(i) forty per cent from amongst the Certified Teachers (General),	of seniority-cum-fitness, in the following manner:	5.	Method of recruitment.	

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Senior Certified Teacher (SCT)(General) (BPS-16).	Senior Theology Teacher (STT) (B-16).	Senior Arabic Teacher (SAT) (BPS-16)			
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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).	By promotion, on the basis of seniority-cumfitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.	By promotion, on the basis of seniority-cumfitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.	No.3; and (b) fifty per cent by initial recruitment.	(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column	(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and
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•	By promotion on the basis of seniority-cum-	ı		(BPS-16).	
	(Agriculture).		T	Senior Drawing Master	17.
	initial recruitment of Certified Teacher			- in the second	
	such and having qualification as prescribed for		The second secon		
	(Agriculture), with at least five years service as	<del></del>		**	
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Certified Teacher (Industrial Arts) (BPS-15).				
(i) Bachelor's Degree University with two relevant technical sometiment Industrial Vocational Institute or (b) Bachelor's Degree (c)				Ccrtificate or two years / Education from a recognized I months Diploma in Education.
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				Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.
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		from a recognized University.		
	-	two years Associate Degree in Education		
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within the Union Council is available, then Iron		Teacher Certificate/ Diploma in Education.		
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having qualification prescribed for initial		•		
with at least five years service as such and				*

### SCHEDULE

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

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 201 total marks =
BA/BSc .	Marks obtained X 20 / total marks =
M.A Arabic / Shahdatul Alamia FII Uloomul Arabia wal Islamia from a recognised Tanzimuatul Wafaqul Madaris	Marks obtained X 20 / total marks =
Other MAINSOIM.Ed I MA Edu	Marks obtained X 15 / total marks =
MPhiUPhD	Marks = 05

### Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X20/total marks =
BAIBSc	Marks obtained X20 / total marks =
MAINSCRI.Ed / NA Edu	Marks obtained X 20/ total marks =
M.A Islamiat / Shuhdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris	Marks obtained X 15/ total marks =
MPhiUPhD	Marks = 05

Category of Qualification	Total Marks 100
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Institution	marks obtained X 201 fold! marks =
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BAIBSc	Marks obtained X 20 / total marks =
MAINISCI M. Ed / NIA Edu	Marks obtained X 15 / total marks =
MPhillPhD	

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

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### Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
1		
SXC	Marks obtained X 20 / total marks =	S Extra marks for FSc, S Extra marks for B.Sc and S Extra marks for M.Sc will be added to the total
HSSC	Marks obtained X 20 / total marks =	score obtained by a candidate during his selection
BA/BSc	Marks obtained X 20 / total marks =	
DM Certificate	Marks obtained X 20 / total marks =	
MAIMSCIM Ed I MA Edu	Marks obtoined X 15 / total marks =	
MPhillPhD	$\lambda forts = 05$	

## Physical Education Teacher

	Marks = 05	MFhil/PhD
2	Marks obtained X 15 / total marks =	MAIMSeIM.Ed I MA Edu
The state of the s	Marks obtained X 20 / total marks =	JDPE or Equivalent Certificate
Ac d	Marks obtained X 20 / total marks =	BA/BSc
score obtained by a candidate during his selection	Marks obtained X 20 / wial marks =	HSSC
5 Extra marks for FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total	Marks obtained X 20 / total marks =	SSC
For Candidate of Science group	Total Marks 100	Category of Qualification

### DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENTKHYBER <u>PAKHTUNKHWA</u>

### **NOTIFICATION**

- WHEREAS, the appellant namely Mst Khadija Bibi is serving as PST (BS-12) at Govt. Girls Primary School Muhammad Gul Killi, Sub-Division Hassan Khel (Ex-FR Peshawar.
- AND WHEREAS, the Departmental Promotion Committee has not promoted the teacher concerned to the post of PET as she was not eligible for promotion under policy November 13, 2012. The Policy for promotion to the post of PET is reproduced as below;

Nomenclature of the post	Minimum qualification and experience for initial appointment or by transfer	Age Limit	Method of recruitment
Physical Education Teacher (BPS-15)	Bachelor's Degree from recognized University with one year Diploma in Physical Education Course or Army equivalency or other equivalent qualification.	18-35	(a)Eighty percent by initial recruitment, and (b) Twenty percent by promotion on the basis of seniority cum-fitness, from amongst the primary school Head Teacher with at least five years service and having qualification prescribed for initial recruitment Physical Education Teacher. Provided that if no suitable candidate is available for promotion then on the basis of seniorlty-cum fitness, from amongst Senior Primary School Teachers with at least five years service ad having qualification prescribed for initial recruitment of Physical Education Teacher.  In case of non-availability of suitable candidate for promotion, then by initial recruitment.

- AND WHEREAS, feeling aggrieved, Mst. Khadija Bibi filed W.P No. 3453-P/2020 case titled Khadija Bibi VS Govt. of KPK & Others, in the Honorable Peshawar High Court Peshawar with the prayer that " It is therefore, most humbly prayed that on acceptance of this writ petition, an appropriate writ may kindly be issued by declaring non-inclusion of the Primary School Teacher (PST) BPS-12 for promotion to the post of physical education teacher BPS-15 as illegal, discriminatory, against the fundamental rights as enshrined in the constitution, against the principles of policy, and be liable to be declared so and the impugned notification dated 13-11-2012 through which the appointment, promotion & Transfer Rule 1989 were issued by the respondents department may kindly be declared illegal and discriminatory to that extent by directing them to insert the post of PST BPS-12 for promotion to the post of PET BPS-15 , the same was decided vide judgment dated 25.08,2020 with the directions to the Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa for decision in accordance with law.
- AND WHERAS, the petitioner has been provided opportunity of personal hearing who apprised the Committee regarding her grievances, upon which The ADEO (Litigation), Hassan Khel Sub-Division provided record pertaining to her grievances

Now therefore, in compliance of the Judgment dated 25-08-2020 of the Honorable Peshawar High Court Peshawar, & having gone through the whole case record along with consulting the relevant provision under Section-21 of General Clauses Act 1897 as amended in 1956, read with APT Rules 1989 & in exercise of the powers conferred upon the undersigned in a capacity of an Appellate Authority, the Departmental Appeal of the petitioner is hereby stand rejected as she was not eligible for promotion under policy November 13, 2012.

> DIRECTOR. (E&SE) Department Khyber Pakhtunkhwa, Peshawar.

Endst: No: 38/0-/51 Dated Peshawarthe 9/03/2021

Copy forwarded for information & n/action to the: -

- Additional Registrar Judicial Peshawar High Court Peshawar.
- Addl: Advocate General Peshawar High Court Peshawar
- District Education Officer (M) Sub-Division Hassan Khel.
- Section Office (Lit-I), Elementary & Secondary Education Department KP.
- Mst Khadija Bibi . serving as PST (BS-12) at Govt. Girls Primary School Muhammad Gul Killi, Sub-Division Hassan Khel (Ex-FR Peshawar.

PA to Director local office.

Depúty Director (Estab) Merged Areas &

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### BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 4755/2021

Khadija Bibi

Versus

District Education Officer (Female) Peshawar & others

Respondents

Application for impleadment of the (1) Secretary Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar & (2) Secretary Govt. of Khyber Pakhtunkhwa, Establishment Department, Peshawar being necessary parties in the panel of respondents.

### Respectfully Sheweth:

- 1. That the above noted service appeal is pending before this Hon'ble Tribunal and is fixed for today i.e. 16.06.2022.
- That the appellant has challenged the amendment in Rule which were effected in consultation with (1) Secretary Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar & (2) Secretary Govt. of Khyber Pakhtunkhwa, Establishment Department, Peshawar, therefore, they being necessary parties may be impleaded in the above titled service appeal in the panel of respondents.

3. That it will be in the interest of justice and equity for just deposal of the case that the above mentioned respondents may kindly be impleaded as respondents.

It is, therefore, humbly prayed that on acceptance of this application, the above mentioned respondents may kindly be arrayed as respondents in the instant service appeal.

Through

Nasir Mehmood

Advocate Supreme Court.

### **AFFIDAVIT**

I, do hereby solemnly declare that the accompanying Application is true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

