
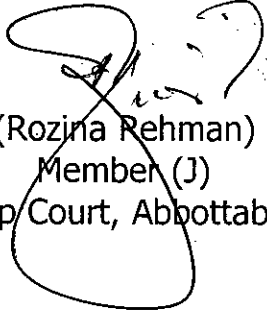



S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	17.03.2021	<p><u>Present.</u></p> <p>Muhammad Liaqat Advocate, ... For appellant Advocate</p> <p>Riaz Khan Paindakheil, ... For respondents Assistant Advocate General</p> <p>Vide detailed judgment of today placed on file of connected Service Appeal No.2231/2019 titled Muhammad Iqbal Vs. Education, the instant appeal is accepted with direction to the respondents to consider the case of promotion of the appellant as per guidelines contained in the Promotion Policy of 2012. Parties are left to bear their own costs. File be consigned to the record room.</p> <p><u>ANNOUNCED.</u> 17.03.2021</p> <p> (Atiq ur Rehman Wazir) Member (E) Camp Court, Abbottabad</p> <p> (Rozina Rehman) Member (J) Camp Court, Abbottabad</p>

12.03.2021

Appellant present through counsel.

Bench is incomplete due to leave of the Hon'ble Member (E) and as such, order could not be announced today.

Adjourned to 17.03.2021 for orders before this D.B at Camp Court, Abbottabad.



(Rozina Rehman)
Member (J)

16.02.2021

Appellant present through counsel.

Riaz Khan Paindakheil learned A.A.G for alongwith Sohail Ahmad Zeb Litigation Officer for respondents present.

Partial arguments heard. Certain documents in respect of Departmental Promotion Committee are not available on file, therefore, respondents are directed to make sure the production of all relevant documents on or before 18.02.2021 before D.B at Camp Court, Abbottabad.

minutes of



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

18.02.2021

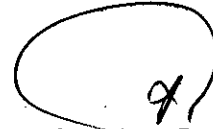
Appellant present through counsel.

Riaz Khan Paindakheil learned A.A.G for alongwith Sohail Ahmad Zeb Litigation Officer for respondents present.

Arguments heard. To come up for orders on 12.03.2021 before this D.B at Principal Seat Peshawar.



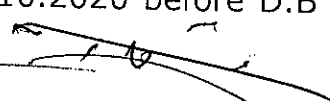
(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

15.09.2020

Mr. Muhammad Liaqat, Advocate for appellant is present. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Sohail Ahmad Zeb, Litigation Assistant for the respondents are also present. Representative of the department submitted joint para-wise comments on behalf of respondents No. 1 to 4, which is placed on file record. File to come up for rejoinder and arguments on 19.10.2020 before D.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD


19.10.2020

Representative of appellant on behalf of appellant present.

Usman Ghani learned District Attorney alongwith Sohail Ahmad Zeb Assistant for respondents present.

Lawyers are on general strike therefore case is adjourned. To come up for arguments on 14.12.2020 before D.B at Camp Court, Abbottabad.

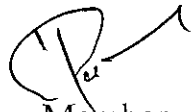

(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

24.01.2020

Clerk to counsel for the appellant present. Notices could not be issued to the respondents due to none submission of security and process fee by the appellant. Clerk to counsel for the appellant stated that the appellant has now deposited the requisite security and process fee. In case the requisite security and process fee has been deposited, notices be issued to the respondents for reply. To come up for written reply/comments on 17.02.2020 before S.B at Camp Court Abbottabad.

Appellant Deposited
Security & Process Fee


Member
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

9 1.20 Due to summer vacation case to come up for the same on 1/15
at camp court abbottabad.


Reader

13.01.2020

Counsel for the appellant present.

Contends that the appellant, presently working as SPST, was duly qualified and eligible for promotion to PSHT (BPS-15). His promotion was however, denied only on the strength of amendments brought about through notification dated 30.01.2018, wherein, the requisite educational qualification was enhanced from intermediate to B.A. As a matter of record, the appellant in view of his date of appointment, had completed ten years of service as PST and had also passed intermediate examination well before the promulgation of amendments. The amendment, therefore, could not be applied with retrospective effect to the case of appellant, it was added. Relies on judgment reported as 2008-SCMR773.

In view of available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all just exceptions. 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 on 23.01.2020 before Touring Bench at Abbottabad.

An application for suspension of operation of order dated 26.09.2019 has been preferred alongwith the appeal. Notice of the application be also given to the respondents for the date fixed. The Departmental Selection Committee constituted through order dated 26.09.2019 shall not finalize the promotion against one post of PSHT till next date.

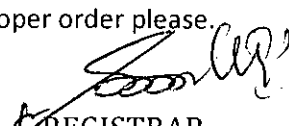
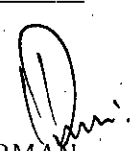
Chairman 

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2235/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/12/2019	<p>The appeal of Mr. Aqeel Ahmad presented today by Mr. Muhammad Liaqat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-02-20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

2235
Appeal No. ___/2019

Aqeel Ahmed son of Khateeb ur Rehman, presently SPST GPS Tarror
Tehsil Havelian, District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Department, Khyber Pakhtunkhwa & Others

.....RESPONDENTS

SERVICE APPEAL


INDEX

S #	Description	Page No's	Annexures
1	Service appeal alongwith Affidavit	01 to 06	
2	Application for Suspension of Operation	7 to 8	
3	Copy of appointment order and pay slip	9 to 10	"A" & "B"
4	Copy of HSSC certificate	//	"C"
5	Copy of writ petition and order	12 to 15	"D" & "E"
6	Copy of the Policy dated 13/11/2012 and impugned order dated 18-12-2019	16 to 32	"F" & "G"
7	Attested copy of the Judgment dated 07-11- 2018	33 to 37	"H"
8	Copy of minutes of the meeting dated 08-05- 2018	38 to 41	"I"
10	Wakalatnama	42	

Dated: 25/12/2019

....APPELLANT

Through


(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

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

Appeal No. ²²³⁵ /2019

Aqeel Ahmed son of Khateeb ur Rehman, presently SPST GPS Tarror
Tehsil Havelian, District Abbottabad.

.....APPELLANT
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 2332

Dated 26/12/19

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education (E&SE), Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (M) Abbottabad.
4. Sub Divisional Education Officer (M) Lower Tanawal Abbottabad.

.....RESPONDENTS

Filed on 26/12/19
[Signature]
Registrar

APPEAL UNDER SECTION 4 OF NWFP (NOW KPK) SERVICE TRIBUNAL, ACT, 1974 AGAINST THE OFFICE ORDER NO.13052/ADEO(Lit) DATED 18-12-2019 ISSUED BY RESPONDANT NO.3 VIDE WHICH DEPARTMENTAL REPRESENTATION OF THE APPELLANT WAS DISMISSED WHICH IS TOTALLY AGAINST THE LAW, POLICY, WITHOUT JURISDICTION, ARBITRARILY, VOID ABINITIO, AND HAVING NO LEGAL EFFECT UPON THE VESTED RIGHTS OF THE APPELLANT.

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED ORDER ENDST: NO. 13052/ADEO(Lit) DATED 18-12-2019 ISSUED BY RESPONDANT NO.3 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY

2,

GRACIOUSLY BE DIRECTED TO PROMOTE THE APPELLANT FROM PST BPS-12 TO SPST BPS-14 AND PSHT BPS-15 WITH ALL BACK BENEFITS AS PER NOTIFICATION NO. SO(PE)SSRC/MEETING/2012/TEACHING CADRE DATED 13-11-2012. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS PROPER IN THE CIRCUMSTANCES OF THE CASE BE GRANTED.

Respectfully Sheweth:-

1. That the appellant was appointed as PTC/PST on 14-07-1990 having prescribed qualification and presently working as SPST BPS-14 at GPS Tarror District Abbottabad. (Copy of appointment order and pay slip are annexed herewith as Annexure "A" & "B" respectively).
2. That the appellant passed HSSC in the year of 2015. (Copy of HSSC certificate is annexed as Annexure "C").
3. That appellant being aggrieved filed writ petition before the August High Court, Abbottabad Bench in which High Court Abbottabad Bench treated the writ petition as departmental representation and same was sent to respondent for decision. Copy of writ petition and order is attached as Annexure "D" & "E".
4. That the request/ departmental representation of the appellant was rejected by the respondent No. 3 vide Endst:

No. 1305~~950~~ dated 18-12-2019 with the remarks that as per Notification dated 30-01-2018 appellant do not fulfill the requisite eligibility criteria for promotion. (Copy of the Policy dated 13/11/2012 and impugned order dated 18-12-2019 is annexed herewith as annexure "F" & "G").

Now appellant seeks indulgence of this Honourable Tribunal for setting aside the impugned order dated 18-12-2019 inter-alia on the following amongst many others:-

GROUNDS:-

- a) That the impugned order dated 18-12-2019 against the law, facts and circumstances.
- b) That the impugned order is illegal passed in highly capricious manner which is void abinitio and without legal authority.
- c) That the respondents had illegally not consider the appellant for promotion and deprived the appellant for his legal right.
- d) That the identical issue was decided by the Honourable Peshawar High Court Abbottabad Bench in WP No. 207-A/2018 dated 07-11-2018 wherein, Honourable Court held that "*there is no mention in Notification dated 30-01-2018 that the same would have retrospective effect.*" (Attested

copy of the Judgment dated 07-11-2018 is annexed here with as Annexure “H”).

- e) That the impugned order dated 18-12-2019 is against the Policy as a meeting was held on 08-05-2018 at committee room of E&SE KP under the chairmanship of respondent No. 2 wherein, issue of promotion was discussed at Serial No. 10 and respondent No. 2 directed all the DEOs including respondent No. 3 **“that the promotion cases of PSTs to SPSTs/PSHTs must be entertained according to the previous Policy of promotion while new Rules are to be applied for new induction/recruitment.”** (Copy of minutes of the meeting dated 08-05-2018 is annexed herewith as Annexure “I”).

- f) That the Notification dated 30-01-2018 is not applicable in the case of appellant as at the time of appointment no such terms and conditions was incorporated in the appointment order of the appellant. Hence, Notification dated 30-01-2018 has no legal value in the case of appellant as appellant is eligible for promotion in view of Notification No. SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012.

- g) That the Notification dated 30-01-2018 is silent whether the same would have retrospective or prospective effect. Hence, impugned order dated 18-12-2019 is liable to be set aside on this score alone.


- h) That the valuable rights of the appellant are involved.
- i) That the appellant seeks leave of this Honourable Tribunal to raise additional grounds during the course of arguments with the permission of Honourable Tribunal.
- j) That the instant service appeal is well within time.
- k) That the other points shall be urged at the time of arguments.

It is, therefore, very humbly prayed that on acceptance of instant appeal impugned order issued vide Endst: No. 13052/ADEO(Lit) dated 18-12-2019 issued by respondent No.3 may graciously be set-aside and respondents may graciously be directed to promote the appellant from PST BPS-12 to SPST BPS-14 and PSHT BPS-15 alongwith all back benefits as per Notification No. SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13-11-2012. Any other relief which this Honourable Tribunal deems proper in the circumstances of the case be granted.

Dated: 25/12/2019

Through

....APPELLANT


(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.


....APPELLANT

6

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. ____/2019

Aqeel Ahmed son of Khateeb ur Rehman, presently SPST GPS Tarror
Tehsil Havelian, District Abbottabad.

.....APPELLANT

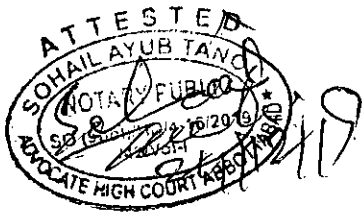
VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Department, Khyber Pakhtunkhwa & Others

.....RESPONDENTS

AFFIDAVIT

I, Aqeel Ahmed son of Khateeb ur Rehman, presently SPST GPS
Tarror Tehsil Havelian, District Abbottabad, do hereby solemnly affirm and
declare that the contents of foregoing appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed from this
Honourable Tribunal.



Aqeel
DEPONENT

7

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. ____/2019

Aqeel Ahmed son of Khateeb ur Rehman, presently SPST GPS Tarror
Tehsil Havelian, District Abbottabad.

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Department, Khyber Pakhtunkhwa & Others

.....RESPONDENTS

APPLICATION FOR SUSPENSION OF OPERATION OF
THE ORDER NO. 10629--31 DATED 26/12/2018 TILL THE
DECISION OF THE ABOVE TITLED SERVICE
APPEAL.

Respectfully Sheweth:-

That the petitioner/appellant submits as under:-

1. That the above referred service Appeal is going to be filed in this Honourable Tribunal and instant application may please be considered as integral part of the appeal in hand.
2. That the service appeal of the petitioner /appellant is prima facie in nature as the impugned order dated 18/12/2018 was issued without lawful authority and clear cut violation of direction of respondent No. 2.
3. That the balance of connivance is also in the favour of appellant.

4. That in case of non suspension of operation of order dated --
26-9-19 the appeal of the appellant would become infructuous and
appellant would be suffered irreparable loss.

5. That all the basic ingredients regarding suspension of the
operation of order dated 26-9-19 temporary injunction is
fulfilled under the law.

It is, therefore, respectfully prayed that on acceptance of
instant application operation of the order dated 26-9-19 may
kindly be suspended till the decision of titled Service
Appeal.

Dated: 25/12/2019

Aqeel

....APPELLANT

Through

Muhammad Liaqat

(Muhammad Liaqat)

(Advocate High Court, Abbottabad)

AFFADAVIT

I, Aqeel Ahmed son of Khateeb ur Rehman, presently SPST GPS
Tarror Tehsil Havelian, District Abbottabad, declare on oath that the
contents of forgoing application are correct and true according to the best of
my knowledge and belief and nothing has been suppressed from this
Honorable Tribunal.

Aqeel

DEPONENT



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

OFFICE ORDER NO. 164 / AE-II/PTCs

Dated: Abbottabad the 14/7 /1990

APPOINTMENT.

As recommended by the Sub Divisional Education Officer (Male) Haripur, The following candidates are hereby ordered in the interest of public service with effect from the date of their taking-over charge in BPS-7 @ Rs.750/- P.M plus usual allowance as admissible under the rules:-

S.No.	Name of candidate/Father's name and address.	Place where recommended appointed	Remarks.
1.	Aqeel Ahmed S/O Khatib-Ur-Rahman R/O Taroora A'Abb	GPS Leeran Abbottabad	vice Abdul Wahed, PTC GPS Leeran proceeded on long leave.
2.	M. Javed Iqbal S/O Behmatullah R/O Haripur	GPS Chack Madra-Haripur	against vacant post

CONDITIONS:-

1. Charge report should be submitted to all concerned.
2. Appointment made under all services conditions laid down by the Government.
3. Appointment is purely temporary and liable to termination at any time without assigning reason and notice. That appointment order will stand cancelled on the arrival of permanent teacher after the expiry of leave.
4. Age and Health certificate may be produce from the Medical Supdt; DHQ Hospital Abbottabad.

Sd/-
DISTRICT EDUCATION OFFICER (MALE)
ABBOTTABAD DISTRICT ABBOTTABAD.

Endst; No. 15597-15600 / PTCs/ AE-II

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

1. Sub Divisional Education Officer (Male) Abbottabad and Haripur

2. Candidate concerned and Schools.

M/S B
District Education Officer (Male)
Abbottabad.

10

ANNEXURE "B"

DNIC: AD7042 Deputy District Officer (Male) Primary Payroll Section : 903 Payroll 3
 1:30 Medical Allowance 1,500.00 3604 Group Insurance 115.00-
 1:48 Adhoc Allowance 2010 4,192.00 3990 Emp. Edu. Fund KPK 100.00-
 2:38 15% Adhoc Relief All 2,400.00 3609 Income Tax 66.00-
 2:34 Adhoc Relief Allow-2 1,600.00
 2:39 Adhoc Relief Allow 2 2,075.00

PAYMENTS 36,684.00 DEDUCTIONS 1,634.00-
 Branch Code: 231609 NEP National Bank of Pakistan LORA

NET PAY 35,050.00 01.07.2015 31.07.2015
 Abbottabad Acctt. No: 4327-6

00-10181 AGEEL AHMED DNIC: 12190483486 Desig: PRIMARY SCHOOL TEACH(80013954) Grade: 12 NTH: 0 Ruckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT REPAID BALANCE

00-01 Basic Pay 19,455.00 3012 GPF Subscription - Rs 1,160.00-
 10:00 House Rent Allowance 1,306.00 3501 Benevolent Fund 180.00-
 11:30 Convey Allowance 20 2,856.00 3511 Addl Group Insurance 13.00-
 1:30 Medical Allowance 1,500.00 3604 Group Insurance 115.00-
 1:48 Adhoc Allowance 2010 4,347.00 3604 Group Insurance 100.00-
 2:38 15% Adhoc Relief All 2,250.00 3990 Emp. Edu. Fund KPK 26.00-
 2:34 Adhoc Relief Allow-2 1,500.00
 2:39 Adhoc Relief Allow 2 1,945.00

PAYMENTS 34,694.00 DEDUCTIONS 1,594.00-
 Branch Code: 231609 NEP National Bank of Pakistan LORA

OFF: EDU 014796 INCOME TAX 276.13 26.00 274,709.00 251.00

NET PAY 33,100.00 01.07.2015 31.07.2015
 Abbottabad Acctt. No: 4506-9

00-10182 NAZAR MOHAMMAD DNIC: 1310109488429 Desig: PRIMARY SCHOOL TEACH(80013955) Grade: 12 NTH: 0 Ruckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT REPAID BALANCE

00-01 Basic Pay 20,755.00 3012 GPF Subscription - Rs 1,160.00-
 10:00 House Rent Allowance 1,306.00 3501 Benevolent Fund 180.00-
 11:30 Convey Allowance 20 2,856.00 3511 Addl Group Insurance 13.00-
 1:30 Medical Allowance 1,500.00 3604 Group Insurance 115.00-
 1:48 Adhoc Allowance 2010 4,347.00 3604 Group Insurance 100.00-
 2:38 15% Adhoc Relief All 2,400.00 3990 Emp. Edu. Fund KPK 68.00-
 2:34 Adhoc Relief Allow-2 1,600.00
 2:39 Adhoc Relief Allow 2 2,075.00

PAYMENTS 36,939.00 DEDUCTIONS 1,636.00-
 Branch Code: 231314 NEP National Bank of Pakistan M/CALI

OFF: EDU 013425 INCOME TAX 739.00 112.00 250,980.00 677.30

NET PAY 35,203.00 01.07.2015 31.07.2015
 Abbottabad Acctt. No: 3430-8

00-10183 SHAH ZAHID DNIC: 1310145531955 Desig: PRIMARY SCHOOL TEACH(80013956) Grade: 12 NTH: 0 Ruckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT REPAID BALANCE

00-01 Basic Pay 20,755.00 3012 GPF Subscription - Rs 1,160.00-
 10:00 House Rent Allowance 1,306.00 6505 GPF Loan Principal In 4,167.00-
 11:30 Convey Allowance 20 2,856.00 3501 Benevolent Fund 180.00-
 1:30 Medical Allowance 1,500.00 3511 Addl Group Insurance 13.00-
 1:48 Adhoc Allowance 2010 4,192.00 3604 Group Insurance 115.00-
 2:38 15% Adhoc Relief All 2,325.00 3604 Group Insurance 100.00-
 2:34 Adhoc Relief Allow-2 1,550.00 3990 Emp. Edu. Fund KPK 81.00-
 2:39 Adhoc Relief Allow 2 2,075.00

PAYMENTS 34,559.00 DEDUCTIONS 5,796.00-
 Branch Code: 231609 NEP National Bank of Pakistan LORA

OFF: EDU 013446 INCOME TAX 740.28 138.00 213,741.00 603.00
 OFF Temp. Advance 0360 150,000.00 25,002.00 124,998.00

NET PAY 28,763.00 01.07.2015 31.07.2015
 Abbottabad Acctt. No: 4479-2

00-10184 MOHAMMAD ARIF KHAN DNIC: 1310171087731 Desig: PRIMARY SCHOOL TEACH(80013957) Grade: 12 NTH: 0 Ruckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT REPAID BALANCE

00-01 Basic Pay 19,455.00 3012 GPF Subscription - Rs 1,160.00-
 10:00 House Rent Allowance 1,306.00 3501 Benevolent Fund 180.00-
 11:30 Convey Allowance 20 2,856.00 3511 Addl Group Insurance 13.00-
 1:30 Medical Allowance 1,500.00 3604 Group Insurance 115.00-
 1:48 Adhoc Allowance 2010 4,192.00 3604 Group Insurance 100.00-
 2:38 15% Adhoc Relief All 2,250.00 3990 Emp. Edu. Fund KPK 26.00-
 2:34 Adhoc Relief Allow-2 1,500.00
 2:39 Adhoc Relief Allow 2 1,945.00

PAYMENTS 34,559.00 DEDUCTIONS 5,796.00-
 Branch Code: 231609 NEP National Bank of Pakistan LORA

NET PAY 28,763.00 01.07.2015 31.07.2015
 Abbottabad Acctt. No: 4479-2

00-10185 MOHAMMAD ARIF KHAN DNIC: 1310171087731 Desig: PRIMARY SCHOOL TEACH(80013957) Grade: 12 NTH: 0 Ruckle No.: PRINCIPAL Gazetted/Non-Gazetted: N
 PAYMENTS AMOUNT DEDUCTIONS AMOUNT REPAID BALANCE

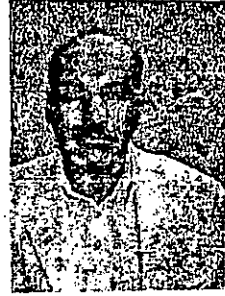
00-01 Basic Pay 19,455.00 3012 GPF Subscription - Rs 1,160.00-
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 11:30 Convey Allowance 20 2,856.00 3511 Addl Group Insurance 13.00-
 1:30 Medical Allowance 1,500.00 3604 Group Insurance 115.00-
 1:48 Adhoc Allowance 2010 4,192.00 3604 Group Insurance 100.00-
 2:38 15% Adhoc Relief All 2,250.00 3990 Emp. Edu. Fund KPK 26.00-
 2:34 Adhoc Relief Allow-2 1,500.00
 2:39 Adhoc Relief Allow 2 1,945.00

PAYMENTS 34,559.00 DEDUCTIONS 5,796.00-
 Branch Code: 231609 NEP National Bank of Pakistan LORA

NET PAY 28,763.00 01.07.2015 31.07.2015
 Abbottabad Acctt. No: 4192-8

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**ABBOTTABAD****Khyber Pakhtunkhwa (Pakistan)**Higher Secondary School Certificate Examination
PROVISIONAL & DETAILED MARKS CERTIFICATEANNEXURE
"C"Roll No: 88111Group: HUMANITIES

Part - II

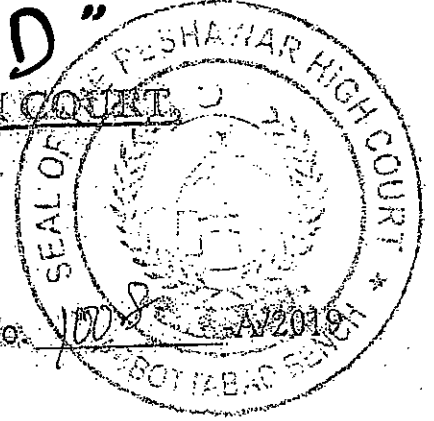
Session: 2015 (Annual)Name: AQEEL AHMEDFather Name: KHATEEB UR REHMANReg No: 7772AB/AD-intMP14Institution/
District: ABBOTTABAD

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May/June as a Private Candidate.

Subjects	Marks	Marks Obtained					Total	Marks in Words
		Part-I		Part-II				
		Theory	Pract	Theory	Pract			
English	200	53	--	22	--	75	Seventy-Five	
Urdu (Comp)	200	33	--	45	--	78	Seventy-Eight	
Islamyat Compulsory	50	26	--	--	--	26	Twenty-Six	
Pakistan Studies	50	--	--	36	--	36	Thirty-Six	
Education	200	48	--	57	--	105	One Hundred Five	
Islamic History	200	46	--	45	--	91	Ninety-One	
Islamyat Elective	200	60	--	55	--	115	One Hundred Fifteen	
Total : 1100						526-D	Five Hundred Twenty-Six Only	
Date : <u>06 August, 2015</u>		Remarks :						

Checked By :
Controller of ExaminationsNote: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH



Writ Petition No. 1008 AV/2019

1. Muhammad Kaleem GPS Thora Kalan District Abbottabad
2. Qadeer Ahmed GPS Batangi, District Abbottabad.
3. Muhammad Tariq GPS Lora, District Abbottabad.
4. Aqeel Ahmed GPS Tatar, District Abbottabad.
5. Muhammad Zaheer GPS Goreeni, District Abbottabad.
6. Mujeeb ur Rehman GPS Goreeni, District Abbottabad.
7. Mir Baz Khan Fatoh, District Abbottabad.
8. Muhammad Iqbal GPS No. 4, District Abbottabad.
9. Rab Nawaz
10. Imtiaz Khan
11. Muhammad Javed
12. Khawaja Waqar GPS Dara Aman, District Abbottabad.
13. Sajid Mehmood
14. Mubarak Ali
15. Safdar Hussain
16. Nusrat Iqbal GPS Thana Karamshah, District Abbottabad.
17. Zahoor Ahmed GPS Mora Changra, District Abbottabad.
- Shafiqe GPS Chehr, District Abbottabad.

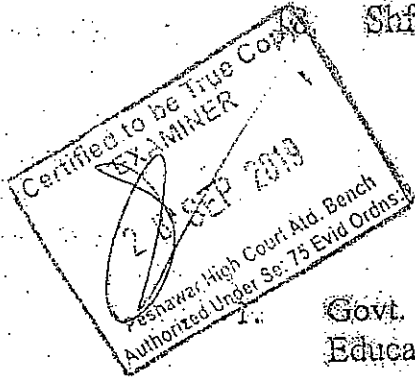
...PETITIONERS

VERSUS

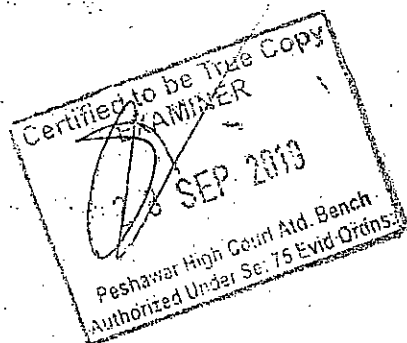
1. Govt. of Khyber Pakhtunkhwa, Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Abbottabad.
4. District Account Officer, Abbottabad.

...RESPONDENTS



WRITE PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN, 1973 FOR DECLARATION TO
THE EFFECT THAT THE PETITIONERS ARE
 5/8/13 ELIGIBLE FOR PROMOTION FROM SPST
BPS-14 TO PHST BPS-15 AS PER PROMOTION
POLICY 2013 BUT THE RESPONDENTS ARE
NOT PROMOTING THE PETITIONERS FROM
THE POST OF SPST TO PHST DUE TO THE
REASONS THAT AS PER NEW POLICY/
RULES, NOTIFICATION DATED 30/01/2018
QUALIFICATION FOR UP-GRADATION/
PROMOTION FOR PHST IS BA WHEREAS, IN
THE OLD POLICY OF 2013 THE
QUALIFICATION FOR PROMOTION TO THE
SAID IS BA, HENCE THE PETITIONERS ARE
ELIGIBLE TO BE PROMOTED AS PHST BPS-
15 AS PER POLICY 2013.



PRAYER: ON ACCEPTANCE OF THE
INSTANT WRT PETITION, RESPONDENTS
MAY GRACIOUSLY BE DIRECTED TO UP-
GRADE/ PROMOTE THE PETITIONERS

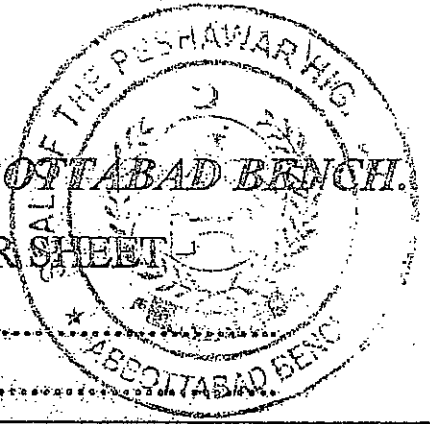
ANNEXURE

"E"

14

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

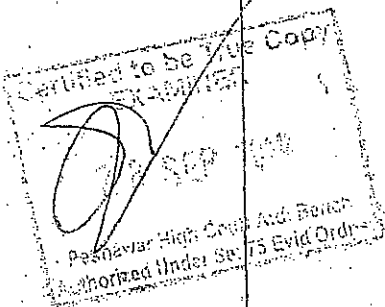


Court of.....

Case No.....

Of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
26.09.2019	<p><u>WP No. 1008-A/2019.</u></p> <p>Present: Mr. Muhammad Arshad Khan Tanoli, Advocate for petitioners.</p> <p>***</p> <p><u>HJAZ ANWAR, J.</u> Through this petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioners Muhammad Kaleem & seventeen others have made the following prayer:-</p> <p><i>That on acceptance on instant writ petition, respondents may graciously be directed to upgrade/promote the petitioners from SPST BPS-14 to PHCT BPS-15 under the old policy of 2013.</i></p> <p>2. At the very outset, learned counsel for petitioners when confronted that the question raised in the instant writ petition relates to the terms and conditions of service he stated that petitioners would not press this petition anymore, if this writ petition is converted into departmental representation/s and send the same to the respondent/department for its decision.</p> <p>3. In view of the peculiar facts and circumstances of</p>



the present writ petition, this Court in the larger interest of justice, and in the light of case law reported as 2017 PLC (C.S), 692 and 2004 PLC (C.S) 1240, treats the present petition as departmental representation/s of the petitioners with directions to respondent/department to consider the grievance of petitioners and decide the matter, strictly in accordance with the law, within statutory period and decisions so made be also communicated to the petitioners. In case the petitioners find themselves still aggrieved after the receipt of reply or if no reply is received, the petitioners may approach the competent forum for the redressal of their grievance.

Sd/ JUDGE

Sd/ JUDGE

Certified to be true copy
 of original
 17 SEP 2019
 Pathankot High Court, Jammu & Kashmir
 Authorized Under Section 75 Evidence Ordinance

16

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ANNEXURE

"F"

ANNEXURE

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SE/PE/14-5/SSRC/Meeting/2012/Teaching Cadre: In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Encl. No. 3. Date as above

Copy forwarded to:-

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

Handwritten notes and stamps:

- PTD
- PST 12
- 5.11.12
- 12/11/12
- 12/11/12

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P-37

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


Section Officer (Primary)

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APPENDIX

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

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

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

	(GENERAL)	(i) Second Class Secondary School Certificate, from a recognized Board with Shahadatul Alamiya Pili Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saifu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (T1) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahadatul Alamiya from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saifu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
12.	Senior Qari (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
13.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

	<p>Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.</p>		<p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General). Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>14. Certified Teacher (Industrial Arts) (BPS-15).</p>	<p>(a) 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 (b) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>

	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst all Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority cum fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teachers (Industrial Arts).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>13. Certified Teacher (Agriculture) (BPS-15).</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teachers (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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

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		<p>University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).</p>		<p>Certified Teacher (Home Economics). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
17.	<p>Drawing Master (BPS-15).</p>	<p>Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.</p>	<p>18 to 35 years.</p>	<p>(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed in 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. <u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>

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

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

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SCHEDULE

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

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/BSc	Marks obtained X 20 / total marks =
M.A Arabic / Shahadatul Amania Fil Uloomul Arabia wal Islamiya from a recognized Tanzimatal Wasatul Madaris	Marks obtained X 20 / total marks =
Other MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks =
MPhil/PhD	Marks = 05

Theology Teacher

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

28

P-49

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Qual/Qualia

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
Qual Samed from a recognized Institution	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
B.A/B.Sc	Marks obtained X 20 / total marks = ____
MA/M.Sc/M.Ed/MA Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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

Category of Qualification	Total Marks 100 For Humanities group at Intermediate/Graduation Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for H.Sc. 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
B.A/B.Sc	Marks obtained X 20 / total marks = ____	
CT Certificate/Diploma in Education/ADE	Marks obtained X 20 / total marks = ____	
MA/M.Sc/M.Ed/MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc. and 5 Extra marks for M.Sc. will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
DM Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

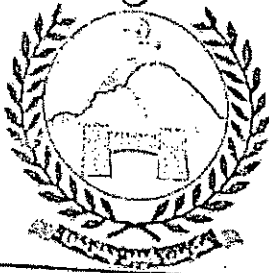
Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc. and 5 Extra marks for M.Sc. will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

31

ANNEXURE
"G"

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



No. 3052 /ADEO LFI

Dated: 18 /12/2019

0992-9310102, 0992-330131

EDD.Education.Atd@gmail.com

To

1. Mr. Muhammad Kaleem GPS Thora Kalan District Abbottabad.
2. Mr. Qadeer Ahmad GPS Bataangi, District Abbottabad.
3. Mr. Muhammad Tariq GPS Lora, District Abbottabad.
4. Mr. Aqeeb Ahmed GPS Tarar, District Abbottabad.
5. Mr. Muhammad Zaheer GPS Goreeni, District Abbottabad.
6. Mr. Mujeeb-ur-Rehman GPS Goreeni, District Abbottabad.
7. Mr. Mir Baz Khan Feteh, District Abbottabad.
8. Mr. Muhammad Iqbal GPS No. 4, District Abbottabad.
9. Mr. Rab Nawaz
10. Mr. Imtiaz Khan
11. Mr. Muhammad Javed
12. Mr. Khawaja Waqar GPS Dara Aman, District Abbottabad.
13. Mr. Sajid Mehmood
14. Mr. Mubarak Ali
15. Mr. Safdar Hussain
16. Mr. Nusrat Iqbal GPS Thana Karamshah, District Abbottabad.
17. Mr. Zahoor Ahmed GPS Mora Changra, District Abbottabad.
18. Mr. Shafique GPS Chehr, District Abbottabad.

Subject: DECISION ON DEPARTMENTAL REPRESENTATIONS IN THE LIGHT OF JUDGMENT DATED 26-09-2019 PASSED IN WP NO. 1008-A/2019 TITLED MUHAMMAD KALEEM & OTHERS VS GOVT OF KHYBER PAKHTUNKHWA & OTHERS

In pursuance to the judgment of Honourable Peshawar High Court Abbottabad Bench Passed in WP No. 1008-A/2019, dated 26-09-2019, undersigned examined the case of the petitioners thoroughly.

In view of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, petitioners do not fulfill the requisite eligibility criteria for promotion hence, departmental representations of petitioners are hereby rejected accordingly.

District Education Officer (M)
Abbottabad.

Copy forwarded for information to the:-

1. Additional Registrar Peshawar High Court Abbottabad Bench with reference to above referred Writ Petition.
2. PA to Deputy Secretary (Legal) E&SED, Khyber Pakhtunkhwa, Peshawar.

- 54 -
District Education Officer (M)
Abbottabad.

REGISTERED POST MOST URGENT BEING COURT MATTER
OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



No. 1124/ADEO(Lit)

Dated: 15/10/2019

32



0992-9310102, 0992-330131

EDO.Education.Atd@gmail.com

To

The Director,
E&SE Khyber Pakhtunkhwa,
Peshawar.

Subject:

**DECISION ON DEPARTMENTAL REPRESENTATIONS IN THE LIGHT OF
JUDGMENT DATED 26-09-2019 PASSED IN WP NO. 1008-A/2019 TITLED
MUHAMMAD KALEEM & OTHERS VS GOVT. OF KHYBER
PAKHTUNKHWA & OTHERS.**

It is submitted that Petitioners filed WP No. 1008-A/2019 before the Honourable Peshawar High Court Abbottabad Bench to effect that the petitioners are eligible for promotion from SPST (BPS-14) to PSHT (BPS-15) as per Policy 2013, but the respondents are not promoting the petitioners from the post of SPST to PSHT due to the new Recruitment Rules/Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, wherein, for qualification for upgradation for PSHT is B.A whereas, in the Policy of 2013 the qualification for promotion was F.A and Honourable Peshawar High Court Abbottabad Bench passed the judgment dated 26-09-2019 in the above referred Writ Petition and the operative part of the judgment is reproduced as under:

"In view of the peculiar facts and circumstances of the present writ petition, this Court in the larger interest of justice, and in the light of case law reported as 2017 PLC (C.S), 692 and 2004 PLC (C.S) 1240, treats the present petition as departmental representation/s of the petitioners with directions to respondent/department to consider the grievance of petitioners and decide the matter, strictly in accordance with the law, within statutory period and decisions so made be also communicated to the petitioners. In case the petitioners find themselves still aggrieved after the receipt of reply or if no reply is received, the petitioners may approach the competent forum for the redressal of their grievance." (Attested copy of judgment attached)

Furthermore, legal notice No 0005 dated 07-10-2019 was also received to this office from the office of Muhammad Liaqat Advocate High Court Abbottabad regarding the same subject matter. (Copy of legal notice attached).

It is, therefore, your gracious honour is requested to refer the instant case to worthy Secretary E&SE for appropriate decision.

Endst: No. 11242

Copy forwarded for information to the:

PA to Deputy Secretary (Legal) E&SED Khyber Pakhtunkhwa, Peshawar.

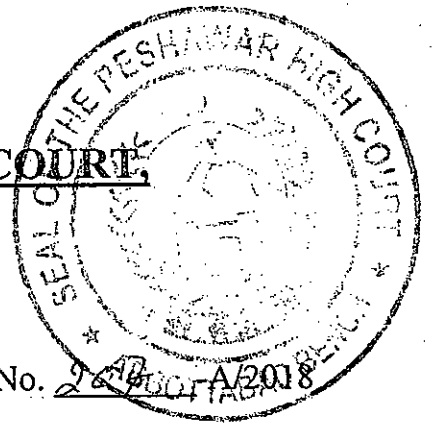
District Education Officer (M)
Abbottabad

Dated: 15/10/2019

District Education Officer (M)
Abbottabad

ANNEXURE 33
"H"

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH



Writ Petition No. 217/18-AB

Muhammad Ali son of Muhammad Manzoor, resident of Dheri Kiala, Lora, Union Council Lora, Tehsil Havelian, District Abbottabad.

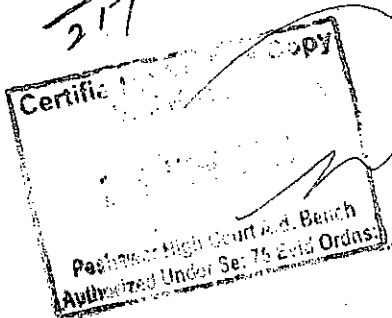
...PETITIONER

VERSUS

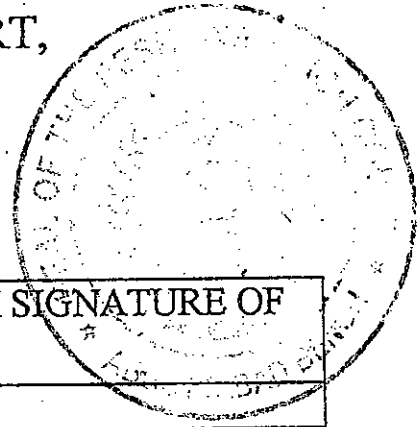
1. District Education Officer (Male) District Abbottabad.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar.

...RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973, FOR ISSUANCE OF A DECLARATION TO THE EFFECT THAT PETITIONER BEING QUALIFIED AND HAVING PASSED NTS EXAMINATION WAS ENTITLED TO BE APPOINTED AS PST IN GPS NAGRI TUTIONAL UNION COUNCIL NAGRI TUTIONAL OR GPS RAHI UNION COUNCIL PHALLAH AS PER CLAUSE 1 OF ADVERTISEMENT PUBLISHED BY RESPONDENTS AND REFUSAL OF



PESHAWAR HIGH COURT,
 ABBOTTABAD BENCH
 FORM 'A'
 FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
<p>07.11.2018</p>	<p><u>W.P No. 207-A/2018.</u></p> <p>Present:- Mr. Awais Abbasi, Advocate for the petitioner.</p> <p>Sardar Muhammad Asif, AAG for the respondents.</p> <p>***</p> <p><u>SYED MUHAMMAD ATTIQUE SHAH, J.-</u> Petitioner Muhammad Ali has invoked the constitutional jurisdiction of this court praying that:-</p> <p><i>“On acceptance of this writ petition, the respondents may graciously be directed to forthwith issue appointment order of the petitioner on the post of PST (BPS-12) with immediate effect in GPS Nagri Tutial Union Council Nagri Tutial or GPS Rahi Union Council Phalla. Any other relief as may be deemed fit and proper in the circumstances of the case.”</i></p> <p>2. In essence, the case of petitioner is that as per Clause-I of the advertisement dated 30.08.2016, when no candidate was available in the concerned union council, then the candidate from adjacent union council was to be considered and since the petitioner was hailing from the</p>

Handwritten signature and official stamp of the court.

Handwritten mark or signature.

adjacent union council, therefore, he was required to have been appointed on the subject post.

3. Respondents were put on notice who appeared and contested the petition by filing their para-wise comments wherein they have relied upon the notification dated 30.01.2018 whereby amendment was made against Serial No. 1 in column No. 3 & 4 of the appendix to Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and submitted that the petitioner was not having the requisite qualification for his appointment.

4. Arguments heard and record perused.

5. Perusal of record reveals that the respondents advertised posts of PST through advertisement dated 30.08.2016, wherein it has clearly been mentioned in clause-I of terms and conditions of advertisement that when a candidate in the concerned union council is not available, then the candidate from the adjacent union council would be considered. It is very much clear from the record as well as comments filed by the respondents that the petitioner fulfill the criteria for his appointment against the subject post.

6. So far as the contention of the respondents that in the light of notification No. SO (PE)4-5SSRC/Meeting/2012/Teaching Cadre/2017 dated 30.01.2018, the petitioner was lacking the requisite

qualification, is concerned, suffice it to mention that in advertisement dated 30.08.2016, the respondents advertised certain posts of Primary School Teacher (PST) and the requisite qualification for the said post was mentioned in the advertisement as Intermediate or equivalent certificate from any recognized board along with Primary School Teacher Certificate or SSC Second division along with two years Associate Degree in Education from any recognized University. Consequent to the said advertisement, several candidates including the petitioner, having qualification upto intermediate, have applied for the said post and appeared in the screening test and some of them having the same qualification, were also appointed against the vacant posts after qualifying the test and interview. Moreover, the advertisement was issued on 31.08.2016 and consequent thereof, the appointments were made on 10.04.2017, whereas the amendment in the rules through the ibid notification was made on 30.01.2018. There is no mention in the notification dated 30.01.2018 that the same would have retrospective effect, therefore, the petitioner carrying the qualification mentioned in the advertisement, would not be subject to the ibid amendment and the respondents without any whim and reason have refused to appoint him which is otherwise against the very terms and conditions of their advertisement.

7. Resultantly, while accepting this writ petition, we direct the respondent No. 1 to consider the petitioner for his appointment against the subject post in accordance with law.

Announced.
07.11.2018

[Signature]
JUDGE
[Signature]
JUDGE

Certified to be True Copy
EXAMINER
23 NOV 2018
Peshawar High Court Ald. Bench
Authorized Under Sec: 75 Evid Ordns.

Tufail*

Hon'ble Justices Lal Jan Khattak & Syed Muhammad Attique Shah.

ANNEXURE " I "

38



**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
 PII: 091-9225344/Fax: 091-9225345 Email: zulfqarulmulk@gmail.com

No. _____ Dated ____/____/2018

Near: Government Shaheed Hussain Sharif Higher Secondary School No-1 City Peshawar.

MINUTES OF THE DPEC MEETING WITH DEOs (M&F) ON May 08, 2018.

Venue: Committee room Directorate of E&SE KP, Peshawar

Timing: 09:00 AM to 04:00 PM

Chaired By: Mr. Farid Khattak Director E&SE KP, Peshawar

Participants: List Attached.



Proceedings:

A meeting was held on 08/05/2018 at Committee room of E&SE KP, Peshawar. The meeting was chaired by Mr. Farid Ahmad Khattak Director E&SE KP, Peshawar local office. The meeting started with the recitation from the holy Quran.

The participants discussed the following agenda items & agreed upon the following points.

S. #	Activity	Decisions	Responsibility
1	Construction of Group Latrines for Girls Students under Conditional Grant 2017-18	The chair directed DEOs concerned to construct group latrines (only for girls' schools) under CG 2017-18 as per the decision of Secretary E&SE in the light of court decision. Work on the rest of schemes/facilities must not be started till the decision of socio-engineering team.	DEOs
2	Pending facilities under CG 2014-15, 2015-16 & 2016-17	The chair shared the grievance of worthy Secretary E&SE regarding pending facilities under CG 2014-15, 2015-16 & 2016-17 on which work still not completed. He also directed DDU team to share the list of pending facilities with concern DEOs and also a copy of it may also be provided to the chair. The chair further directed the concerned DEOs to provide school wise lists of pending facilities & complete all such pending facilities and work on such facilities may also be monitored on weekly basis.	DDU team. DEOs
3	Purchase of Science Equipment for Schools, F&F IT Equipment for newly created SDEOs Offices	The chair was informed by a few DEOs that their respective Deputy Commissioners are not willing to convene the purchase committee meetings for the purchase of Science Equipment, F&F and IT equipment for newly established SDEOs offices. The chair directed DEOs to constitute local committee under their personal chairmanship and ensure the utilization of the budget under the said heads up to 30 th May 2018 (The target get was set by all the DEOs).	DEOs

Note: All employees E&SE department & other interested ones, please type "Follow Dir_ESE_KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.



**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
P.H. 091-9225344/Fax: 091-9225345 Email: zulfiaqar@mkbc@gmail.com

No. _____ Dated ___/___/2018

Near Government Shahheed Hussain Sharif Higher Secondary School No-1 City Peshawar

4	Autonomy of HSS	The chair directed the DEOs to shift the funds under hiring of teachers (only) in Autonomy budget of HSS to the PTC accounts of the respective school to be utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring. Chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSSs/GHSSs to discuss the issues in the utilization of autonomy budget and its resolution.	DEOs
5	Release of Remaining 25% budget under Non-salary head	It was revealed that almost 70% of the budget under Non-Salary head have been utilized therefore the chair directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of Conveyance Charges for Female ASDEOs	As per the direction of the Secretary E&SE, utilization under this head is alarmingly low therefore as per decision of the Secretary E&SE the chair further directed DEOs to submit & clear all the pending bills immediately & in future submits all such bills along with relevant documents to the account offices up to 5 th of each month for clearance. The bills of previous month (if not cleared for any reason) shall not be paid to the ASDEOs afterwards.	DEOs
7	Reporting of issues regarding budget execution to Directorate	It was revealed in the meeting that some DEOs have issues on part of DC office, DO (F&P) and District Govt. with reference to the budget execution in this regard the Deputy Director PSD suggested that they should report such issues well in time to Directorate in order to tackle such issues immediately, at proper forums.	DEOs
8	GPS Coordinates for developmental schemes	Regarding PC-I for developmental schemes Deputy Director PSD suggested the DEOs to send GPS coordinates/ GIS map location with PC-I for proper verification of the proposed site. Sample GPS coordinates/ GIS map sheet will be shared with all DEOs via email.	DEOs DD PSD
9	Vacant Positions	All the DEOs (Male & Female) directed to provide vacant position of all cadres & data regarding retirement of personnel (from 1 st April 2018 to 30 th September 2018) of each cadre with proper school wise STR must be sent ASAP.	DEOs DD PSD
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPSTs/PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment.	DEOs

Note: All employees E&SE department & other interested ones, please type "Follow Dir_E&SE_KP" in your mobile message & send it to "10101" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.

40



**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
Ph: 021-92253144/Fax: 021-92253145 Email: zulfiqarutmulke@gmail.com

No. _____ Dated ____/____/2018

Near: Government Shaheed Hussain Sharif Higher Secondary School No-1 City Peshawar.

11	Posting/ Transfer of NTS appointed teachers	The chair directed to implement wedlock policy regarding transfer of employees appointed through NTS in addition to mutual transfers and exigency as per rules and regulations already notified	DEOs
12	Late time school visits	DEOs to ensure surprise visits of their schools after the duty hours to prevent the un-authorized use of school building/resources	DEOs
13	Communication with District Officials	Chair directed DEOs to respond the official calls/ SMS/ emails within the duty hours as well as after the close of business. All of them must follow the official WhatsApp group and not to quit it. The officials are advised to use the official WhatsApp group for only relevant contents /communications	DEOs
14	Scout	DEOs are directed not to follow the orders /instruction/ suggestions of personnel not related to the E&SE Department regarding scout activities	DEOs
15	Social media communication	With reference of the CS directives all the DEOs (M&F) directed to create their official district level Face book & Twitter accounts, update them regularly and share their proper links along with details of local person with DD P&D immediately	

27/12-913

Deputy Director (P&D)
E&SE Khyber Pakhtunkhwa

Endstt. No _____ Meeting minutes/DPES-I/ Dated 14/12/18

Copies communicated to;

1. PS to Director local office
2. All the DEOs (M&F) for information & proper compliance
3. Office file

- self -
Deputy Director (P&D)
E&SE Khyber Pakhtunkhwa

Note: All employees E&SE department & other interested ones, please type "Follow Dir_ESE_KP" in your mobile message & send it to "10101" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.

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

PH:091-9225344/Fax 091-9225345 Email: zulfiqarulmalik@gmail.com

NEAR GOVERNMENT SHAHEED HUSSAIN SAIF HIGHER SECONDARY SCHOOL NO. -1 CITY PESHAWAR.

4	Autonomy of HSS	The Chair directed the DEOs shift the funds under hiring of teachers fondly in Autonomy budget of HSS to the PTC accounts of the respective school to utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSS and GGSSSSs to discuss the the agues in the mutation of autonomy budget and is resolution	DEOs
5	Release of reaining 25% budget under non salary head	It was fevered that their brost to the budget under non salary have been utilized therefore the other directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of conveyance chaiges for female asdeos	As per the direction of secretary E&SE utilization under this head is alarmingly low therefore as set per decision of the secretary E&SE the Chair further directed DEOs to submit &their all pending bills immediately and in future submits all such bills along with relevant documents to teh account offices up to 5th of each month for clearance the bills of previous month not cleared for any reason not be paid to the ASDEOs afterwards	DEOs
7	Reporting of ussues regarding budget execution to directorate	It was revealed in the meeting thatsome DEOs have ussues on part of DC office DOE&P and District Govt with refrence to the execution with this regard the deputy Director PSD suggested that they should report such issues within time to directorate in order to such issues well immediately at proper forums.	DEOs
8	GPS coordinates for developmental schemes	Regarding PC 1 for developmental schemes deputy Director P&D suggested the DEPs to sent GPS coordinates GIS map location with PC 1 for proper verification of the proposed site sample GPS coordinates GIS map sheet will be shared with all DEOs by email	DEOs DD P &D
9	Vacant Positions	All the DEOs (Male & Female directed to provide vacant position of all cadres & data regarding retirement of persons from 1st April 2018 to 30th September 2018 mst be sent ASAP	DEOs DD P &D
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPSTs, PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction recruitment.	DEOs

Note: All employees E&SE department & other interested please type "Follow Dir_ESE_KP" your mobile massage and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA**
PH:091-9225344/Fax 091-9225345 Email: zulfiqarulmalik@gmail.com

NEAR GOVERNMENT SHAHEED HUSSAIN SAIF HIGHER SECONDARY SCHOOL NO. -1 CITY PESHAWAR.

4	Posting transfer of NTS appointments Teachers	The Chair directed to implement wedlock policy regarding transfer of employee appointed through NTS in addition to mutually transfers and agency as per rules and regulations already notified.	DEOs
5	Late time school Visit	DEOs to ensure surprise visit of schools after the duty hour to provincial un authorize of shcool buildings assurance .	DEOs
6	Communication with District Official	Chair Directed DEOs to respond the official calls/SMS Emails within the duty hours as well as after the close of business all of them must follow the official whatsapp group and not to quite if the officials are advised to use the official whatsapp group for only relevant contents /communication	DEOs
7	Scout	DEOs are directed not to follow the orders/instruction/ suggestions of personal not related to the E&SE department regarding scout activities.	DEOs
8	Social mean communication	With refrence of the S directive all the DEOs(M&F) directed to creat their official district level face book & twitter accounts update them regularly and share and share their prior this along with details of fact person with DDP&D immediately	DEOs DD P &D

Deputy director (P&D
E&SE Khyber Pakhtunkhwa

Endst No. _____ Meeting minutes/DPES-1/dated _____

Copies communicated to:

1. PS to Director Local Office
2. All the DEOs (M&F for information & proper compliance
3. Office file

Deputy director (P&D
E&SE Khyber Pakhtunkhwa

Note: All employees E&SE department & other interested please type "Follow Dir_ESE_KP" your mobile message and sent it to 40404 to get free tweet's of Directorate of E&SE KP Peshawar on your mobile.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD


41

NOTIFICATION

The Committees comprising the following officers/officials is hereby constituted to examine, check and scrutinize the documents regarding promotion from PST to SPST, SPST to PSHT, PSHT to CT, PET & DM and recommend the name of eligible candidates for promotion.

Committee	Name of Officer	Designation	Cadre	Date of Scrutiny	Place of Scrutiny
1	Babu Jehangir	SDEO (M) Abbottabad	PST to SPST	01-3/10/2019	DEO (M) Office Ard
	Muhammad Naseer	SDEO (M) Lora	do	do	do
	Zaheer Ahmed Qureshi	Superintendent			
	Naqash Khan	ASDEO Circle Abbottabad	do	do	do
	Muhammad Bashir	Assistant	do	do	do
2	Abdul Qayyum	SDEO (M) Havelian	SPST to PSHT	do	do
	Arshad Mehmood	ADEC (E) Primary			
	Syed Mehmood ul Hassan	ASDEO Circle Havelian	do	do	do
	Muhammad Saeeq	B&AO Local Office	do	do	do
	Asif Khan	ASDEO Circle Dharmtour	do	do	do
	Muhammad Zaman	Assistant Local Office	do	do	do
3	Mahroof Khan	SDEO (M) Lower Tanawal	PSHT to CT, DM, PET	do	do
	Zubair Ali	ASDEO Circle P.K.Khan	do	do	do
	Irshad Ali	ASDEO Circle Nathia Gali	do	do	do
	Rabnawaz Khan	ADEO (E) Secondary	do	do	do
	Aqeel Khan	J/C Local Office	do	do	do


Note: All the ASDEOs Circle are directed to be present during the scrutiny of documents during the above period.


 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD
 Dated 26/9 /2019

Indst. No. 170/1 Promotion SPST to PSHT

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy District Education Officer (M) Local Office
3. All the Member of Committee


 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

وکالت نامہ

کورٹ فیس

بعدالت جناب سروس سہیل لٹاورہ

عنوان: محفل اہل

منجانب: ایڈوکیٹ

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام

محفل اہل

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

جائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 25/12/2019

Accepted
6
Accepted
A. Hossain

بمقام:

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2235/2019

Aqeel AhmedAppellant

VERSUS

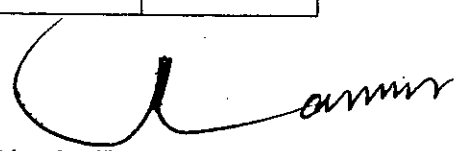
Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

INDEX

Sr.No	Description	Page Nos	Annexures
1	Comments alongwith affidavit.	01 to 03	
2	Copy of Notification dated 30-01-2018	04 to 07	"A"

Dated: 03/06/2020


District Education Officer (M)
Abbottabad.
(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.
Appeal No. 2235/2019

Aqeel AhmedAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

Comments on behalf of Respondents are submitted as under:-

Preliminary objection:-

1. That the appellant has no cause of action to file the instant appeal.
2. That the appeal is hopelessly time barred hence, liable to be dismissed.
3. That the instant appeal is not maintainable in its present form.
4. That the appellant has no locus standi to file instant appeal.
5. That the appellant has filed the present appeal just to pressurize the respondents.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appellant is estopped to sue due to his own conduct.
8. That the instant appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.
9. That the instant appeal is against the Service Laws.
10. That in view of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 appellant do not fulfill the requisite criteria for promotion.

Factual Objections:-

1. That the Para No. 1, of the service appeal relates to the service record hence, need no comment.
2. That the Para No. 2, of the service appeal relates to academic record.
3. That the Para No. 3, relates to record.
4. That the Para No. 4, of the service appeal is correct as amendments regarding requisite qualification were made vide Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 as per Notification dated 30-01-2018 the requisite qualification for promotion is

Bachelor Degree whereas, appellant do not fulfill the requisite qualification.
(Copy of Notification dated 30-01-2018 is annexed herewith as annexure "A").

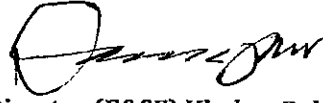
Grounds:

- a. That ground a, as composed is incorrect hence, denied. Impugned order dated 18-12-2019 is in accordance with the Law and Policy.
- b. That ground b, as composed is incorrect hence, denied. As replied in Para 4 of Factual Objections.
- c. That ground c, as composed is incorrect hence, denied. As replied above.
- d. That ground d, relates to record.
- e. That ground e, as composed is incorrect hence, denied as appellant is not eligible for promotion due to non having the requisite qualification i.e. Bachelor.
- f. That ground f, as composed is incorrect hence, denied. As replied above.
- g. That ground g, as composed is incorrect hence, denied. As replied above.
- h. That ground h, as composed is incorrect hence, denied. As replied above.
- i. The respondents seek leave to raise additional grounds during the time of hearing.
- j. That ground j, as composed is incorrect hence, denied.
- k. That the respondents seek leave of this Honorable Court to raise additional grounds at the time of arguments.

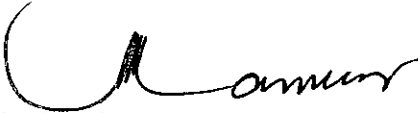
Under the circumstances, it is humbly prayed that the instant appeal is meritless against the law and facts, hence liable to be dismissed with cost.



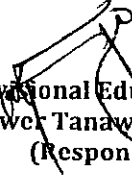
Secretary (E&SED) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 1)



Director (E&SE) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 2)



District Education Officer (M)
Abbottabad.
(Respondent No. 3)



Sub Divisional Education Officer (M)
Lower Tanawal Abbottabad.
(Respondent No. 4)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2235/2019

Aqeel AhmedAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

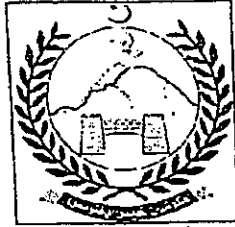
AFFIDAVIT

I, Mr. Muhammad Tanveer, District Education Officer (M) Abbottabad, do hereby affirm and declare that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Court.



DEPONENT

Ann "A"
04



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

NOTIFICATION

Peshawar, dated the 30th January, 2018.

1617
19-2-18

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department hereby directs that, in this Department's Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated 13-11-2012, the following further amendments shall be made, namely:-

AMENDMENTS

In the Appendix,-

(i) against Serial No.1, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) At least Second Class Bachelor's Degree or four (4) years BS Degree in the relevant subject; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	21 to 35 years";

(ii) against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis. (a) Chemistry, Botany or Zoology; or	19 to 35 years";

*Suppld /
ADOLE
For Compliance
is awarded*

17/2/18

(b) Physics, Maths or Statistics; or (c) Humanities and other equivalent groups at degree level with English as subject: and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	
--	--

(iii) against Serial No. 10, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) At least Second Class Master's Degree in Arabic from a recognized University; or at least Second Class Bachelor's Degree from a recognized University with Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(iv) against Serial No. 11, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) At least Second Class Master's Degree in Islamiyat from a recognized University; or at least Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(c6)

3

(v) against Serial No. 13, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(vi) against Serial No. 17, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(vii) against Serial No. 18, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(viii) against Serial No. 21, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years"; and

(ix) against Serial No.22, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Qirat Sanad from registered Institution; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years.

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

Endst: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (E&SE) Department Khyber Pakhtunkhwa Peshawar
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *A/Abbott*
14. All District Accounts Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers/ Agency Accounts Officers in FATA.
16. PS to Governor Khyber Pakhtunkhwa. Peshawar.
17. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
19. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.

[Signature]
20.1.19
SECTION OFFICER (Primary)

لجودالت ضابطہ سرٹیفکیٹ کیلئے

عقیدت کے نام گورنمنٹ و دیگر

درخواستیں۔ ہر دور حکم سماعت میں منجانب
لیٹا در لوجہ Urgent matter مابعد صدر
فرمانے تا دماغ برائے تہیہ کوئی ایک ماہ

جناب عالیہ درخواستیں ذیل ہے۔

۱۔ میں عنوان زیر سماعت سرٹیفکیٹ لیتا ہوں
جو کہ تہیہ کوئی ایک ماہ کے لیے صرف
21/2/2020 کے لیے منظور شدہ ہیں۔

۲۔ یہ ایک عنوان میں Statutory matter
involve ہے اس لیے جناب سے درخواست
ہے کہ اس میں عنوان منجانب لیٹا در کے لیے
صدر فرمائے جانے۔

لیٹا در درخواست پیش ہے
صبر شریع عنوان صادر
فرمایا جاوے۔

المسرفوم 08/20

عقیدت کے (ایڈوائس) بذریعہ دست و

۱۱/۱۱

Hearing be accelerated
to 13/11/2020 at
Peshawar.

۱۱/۱۱

MS-4

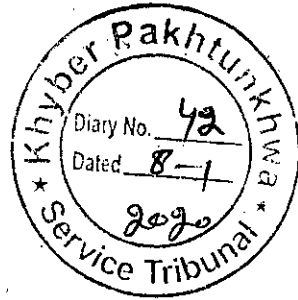
۱۱/۱۱

8/11/2020

کیڈٹ صاحب سروس ٹریبونل Pkd لاہور

put up to the court with relevant appeal.

عقید احمد نام گورنمنٹ



08/01/2020

Deorder urgent matter رجوع سماعت کیوجہ رجوع سماعت پر رجوع اپیلانٹ
درد حکم Status پر رجوع اپیلانٹ

صاحب عالی: درخواست زیل ہے۔

1: کہ درپیل عنوان زیر سماعت عدالت پڑا ہے جس
آئیندہ ہستی عرفہ 2/2020/212 شریک شدہ ہے۔

2: کہ درپیل عنوان میں Status کا matter involve ہے جس میں تا دغ میں ہستی ہے
مقرر فرمادی گئی ہے۔

3: کہ درپیل عنوان میں اپیلانٹ نے درخواست حکم
امتناعی قرار دی ہے جس پر نا حال ٹریبونل حکم صادر
فرمایا گیا ہے۔ اثر بلان کی درخواست پر
کوئی حکم صادر نہ فرمایا گیا تو اپیلانٹ کی درپیل
کا مقصد ختم ہو جائے گا اور اپیلانٹ کو ناہلی
تلاش نقصان ہوگا۔

پیدا ہند عاقبہ اپیل میں جلد
سماعت فرمائے درخواست اپیلانٹ
بابت Status پر حکم صادر فرمایا جاوے۔

المرقوم: 08/20

عقید احمد (اپیلانٹ) بزرگ دہرود
اللہ

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2235/2019

Aqeel AhmedAppellant

VERSUS


Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

INDEX

Sr.No	Description	Page Nos	Annexures
1	Comments alongwith affidavit.	01 to 03	
2	Copy of Notification dated 30-01-2018	04 to 07	"A"

Dated: 03/06/2020


District Education Officer (M)
Abbottabad.
(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.
Appeal No. 2235/2019

Aqeel AhmedAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

Comments on behalf of Respondents are submitted as under:-

Preliminary objection:-

1. That the appellant has no cause of action to file the instant appeal.
2. That the appeal is hopelessly time barred hence, liable to be dismissed.
3. That the instant appeal is not maintainable in its present form.
4. That the appellant has no locus standi to file instant appeal.
5. That the appellant has filed the present appeal just to pressurize the respondents.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appellant is estopped to sue due to his own conduct.
8. That the instant appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.
9. That the instant appeal is against the Service Laws.
10. That in view of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 appellant do not fulfill the requisite criteria for promotion.

Factual Objections:-


1. That the Para No. 1, of the service appeal relates to the service record hence, need no comment.
2. That the Para No. 2, of the service appeal relates to academic record.
3. That the Para No. 3, relates to record.
4. That the Para No. 4, of the service appeal is correct as amendments regarding requisite qualification were made vide Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018 as per Notification dated 30-01-2018 the requisite qualification for promotion is


Bachelor Degree whereas, appellant do not fulfill the requisite qualification.
(Copy of Notification dated 30-01-2018 is annexed herewith as annexure "A"):


Grounds:

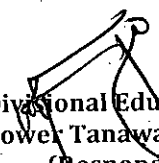
- a. That ground a, as composed is incorrect hence, denied. Impugned order dated 18-12-2019 is in accordance with the Law and Policy.
- b. That ground b, as composed is incorrect hence, denied. As replied in Para 4 of Factual Objections.
- c. That ground c, as composed is incorrect hence, denied. As replied above.
- d. That ground d, relates to record.
- e. That ground e, as composed is incorrect hence, denied as appellant is not eligible for promotion due to non having the requisite qualification i.e. Bachelor.
- f. That ground f, as composed is incorrect hence, denied. As replied above.
- g. That ground g, as composed is incorrect hence, denied. As replied above.
- h. That ground h, as composed is incorrect hence, denied. As replied above.
- i. The respondents seek leave to raise additional grounds during the time of hearing.
- j. That ground j, as composed is incorrect hence, denied.
- k. That the respondents seek leave of this Honorable Court to raise additional grounds at the time of arguments.

Under the circumstances, it is humbly prayed that the instant appeal is meritless against the law and facts, hence liable to be dismissed with cost.


Secretary (E&SED) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 1)


Director (E&SE) Khyber Pakhtunkhwa
Peshawar.
(Respondent No. 2)


District Education Officer (M)
Abbottabad.
(Respondent No. 3)


Sub Divisional Education Officer (M)
Lower Tanawal Abbottabad.
(Respondent No. 4)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2235/2019

Aqeel AhmedAppellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

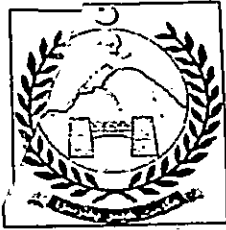
JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

AFFIDAVIT

I, Mr. Muhammad Tanveer, District Education Officer
(M) Abbottabad, do hereby affirm and declare that contents of forgoing
comments are correct and true according to the best of my knowledge and
belief and nothing has been suppressed from this Honorable Court.



DEPONENT



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

NOTIFICATION

Peshawar, dated the 30th January, 2018.

16/2
19-2-18

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department hereby directs that, in this Department's Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated 13-11-2012, the following further amendments shall be made, namely:-

AMENDMENTS

In the Appendix,-

(i) against Serial No.1, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) At least Second Class Bachelor's Degree or four (4) years BS Degree in the relevant subject; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	21 to 35 years";

(ii) against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis. (a) Chemistry, Botany or Zoology; or	19 to 35 years";

Sigraht/ADORE

For Compliance assured

17/2/18

(b) Physics, Maths or Statistics; or (c) Humanities and other equivalent groups at degree level with English as subject, and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	
---	--

(iii) against Serial No. 10, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) At least Second Class Master's Degree in Arabic from a recognized University; or at least Second Class Bachelor's Degree from a recognized University with Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(iv) against Serial No. 11, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) At least Second Class Master's Degree in Islamiyat from a recognized University; or at least Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(v) against Serial No. 13, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(vi) against Serial No. 17, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(vii) against Serial No. 18, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

(viii) against Serial No. 21, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) Bachelor's Degree from a recognized University; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years"; and

(ix) against Serial No.22, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Qirat Sanad from registered Institution; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years".

**SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT.**

Endst: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (E&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *A/Abd*
14. All District Accounts Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers/ Agency Accounts Officers in FATA.
16. PS to Governor Khyber Pakhtunkhwa. Peshawar.
17. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
19. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.

30/1/19
SECTION OFFICER (Primary)