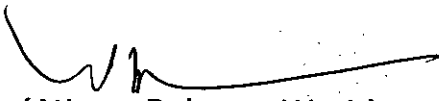
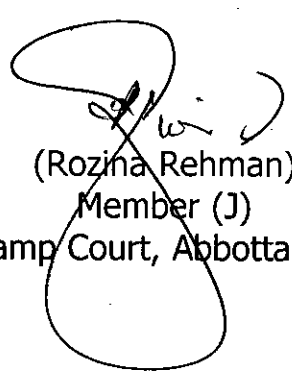



S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	17.03.2021	<p><u>Present.</u></p> <p>Muhammad Liaqat Advocate, ... For appellant Advocate</p> <p>Riaz Khan Paindakheil, ... For respondents Assistant Advocate General</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



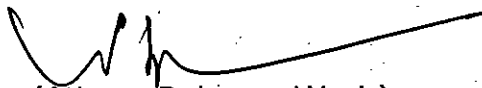
(Rozina Rehman)
Member (J)
Camp Court, A/Abad

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

Due to summer vacation case to come up for the same on 115
9 / 20 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

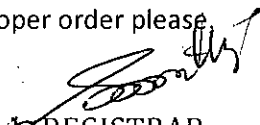



Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2234/2019

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. Muhammad Ishfaq 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**

Appeal No. 2734/2019

Yousaf
Muhammad ~~Asfaq~~ S/O Muhammad Yousaf R/O Tehsil Lower Tanawal
District Abbottabad, presently posted as PST GPS Khanda Khu
AbbottabadAPPELLANT

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 05	
2	Application for Suspension of Operation	06 to 07	
3	Copy of Appointment Order	8 to 10	"A"
4	Copy of Pay Slip	11	"B"
5	Copy of HSSC Certificate	12	"C"
6	Copy of Notification dated 13-11-2012	13 to 26	"D"
7	Copy of Departmental Representation	27	"E"
8	Copy of the impugned order dated 18-12-2019	28	"F"
9	Attested copy of the Judgment dated 07-11-2018	29 to 33	"G"
	Copy of minutes of the meeting dated 08-05-2018	34 to 37	"H"

Dated: 25/12/2019

Yousaf
.....APPELLANT

Through

Muhammad Liaqat
(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

1/

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. 7234/2019

Ashfaq
Muhammad ~~Asfaq~~ S/O Muhammad Yousaf R/O Tehsil Lower Tanawal
District Abbottabad, presently posted as PST GPS Khanda, Khu
Abbottabad

.....APPELLANT

Diary No. 2328

Date 26/12/19

VERSUS

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

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 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

Filed to Day
26/12/19
Registrar

2/

HONOURABLE TRIBUNAL DEEMS PROPER IN THE
CIRCUMSTANCES OF THE CASE BE GRANTED.

Respectfully Sheweth:-

1. That the appellant was appointed as PTC/PST on 22-10-1994 having prescribed qualification and presently working as PST BPS-13 at GPS Khanda Khu 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 2016. (Copy of HSSC certificate is annexed as Annexure "C").
3. That appellant submitted his departmental representation on 08-10-2019 to the respondent No. 3 to the effect that he be promoted as SPST as per the Policy dated 13-11-2012. (Copy of the Policy dated 13-11-2012 and departmental representation are annexed herewith as Annexure "D" & "E" respectively).
4. That the departmental representation of the appellant was rejected by the respondent No. 3 vide Endst: No. 13059 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 impugned order dated 18-12-2019 is annexed herewith as annexure "F").

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:-

GROUND:-

- 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 “G”).
- 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 “H”).
- 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.

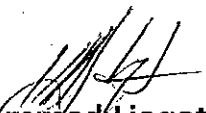
It is, therefore, very humbly prayed that on acceptance of instant appeal impugned order issued vide Endst: No. 13052/ADEO(Lit) dated 18-12-2019 issued by respondent No.3 may graciously be set-aside and respondents may graciously be directed to promote the appellant from PST BPS-12 to SPST BPS-14 and 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



....APPELLANT

Through



(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

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

Appeal No. ____/2019

Jshfaq
Muhammad ~~Asfaq~~ S/O Muhammad Yousaf R/O Tehsil Lower Tanawal
District Abbottabad, presently posted as PST GPS Khanda Khu
Abbottabad**APPELLANT**

VERSUS

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

.....**RESPONDENTS**

AFFIDAVIT

Jshfaq
I, Muhammad ~~Asfaq~~, S/O Muhammad Yousaf R/O Tehsil
Lower Tanawal District Abbottabad, presently posted as PST GPS
Khanda Khu 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.

Jshfaq
DEPONENT

6/

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. ____/2019

Muhammad ^{Asfaq} S/O Muhammad Yousaf R/O Tehsil Lower Tanawal
District Abbottabad, presently posted as PST GPS Khanda Khu
AbbottabadAPPELLANT

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 26-9-19 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.


.....APPELLANT

Through


(Muhammad Liaqat)
(Advocate High Court, Abbottabad)

7

AFFADAVIT

I, Mr. Muhammad ~~Asfar~~ ^{Ishfaq}, S/O Muhammad Yousaf R/O Tehsil Lower Tanawal District Abbottabad, presently posted as PST GPS Khanda Khu 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.

Ishfaq
DEPONENT

APPOINTMENTS.

DATE: 10/10/1971

⑧

Annex "A"

The following trained PTC Candidates of District Abbottabad are hereby appointed against the PTC posts as noted against each in BPS 7 @ Rs.1480-81-2695/PM. plus allowances as admissible under the Rules, in the interest of public service with effect from the date of their taking over charge.

S.NO.	Name/Father's Name/Address.	Place Where Appointed.	Remarks.
1:-	Mr. Pannah Ali Shah, s/o Mushtaq Hussain, R/o Banda Muneer Khan, Abbottabad.	GMPS Mohra	Agst. Post. Against Vacant PTC Post. -do-
2:-	Mohammad Sajid s/o Wali Mohammad R/o More kalan, Abbottabad.	GPS Langrial	-do-
3:-	Jamil Ahmad s/o Mohd Firdous R/o Behram Gali (S.N.Khan).	GMPS Jawa	-do-
4:-	Muneer Ahmad s/o Naseerud-Din R/o Havelian, City.	GPS Jagian	-do-
5:-	Gul Javeed s/o Munisif Khan R/o Nawab-Shehr, Abbottabad.	GMPS Nakar Mughal.	...do....
6:-	Munir Ahmad s/o Fazal Dad, R/o Banda Pir Khan, A. Abad.	GPS Bagh.	...do....
7:-	Shah Mohammad s/o Khani Zaman, R/o Ghora Bazgran.	GMPS Gadda Sangala.	...do....
8:-	Mohammad Alyas s/o Mohd Din R/o Nowshehra.	GMPS Nakkar (Tharyati).	...do....
9:-	Abdul Sattar s/o Abdul Jabbar R/o Kangrora Abbottabad.	GPS Jabri (S.N.Khan).	...do....
10:-	Saeed Khan s/o Faeed Khan, R/o Bhuraj, Abbottabad.	GPS Tipara.	...do....
11:-	S. Azhar Hussain s/o Shah Mohammad R/o Dhantaur, Abbottabad.	Jandar Bari.	...do....
12:-	Mohammad Rahim s/o Mehtab Khan, R/o Dheri Maira, Abbottabad.	GPS Gali Batgran.	...do....
13:-	Naseem Anwar, s/o Ibrat Khan, R/o Phallah, Abbottabad.	GPS Ahmad A. Khan	...do....
14:-	Iqbal Khan s/o Inyat Khan, R/o Muzari Kehal, Abbottabad.	GPS Ratolani.	...do....
15:-	Hafeez Ahmad s/o Aziz Ahmad R/o Sher By Sydian.	shsh, GMPS Banj B-Gali.	...do....
16:-	Misri Khan s/o Ali Zaman, R/o Byan Ahmad Ali Khan, A. Abad.	GPS Dubran.	...do....
17:-	Tariq Khan s/o Fazalur Rehman, R/o Langra, Abbottabad.	GMPS Sergo.	...do....
18:-	Sajjad Ahmad s/o Abdul Hafeez R/o Bandi Mansoor, Abbottabad.	GMPS Khaiterkotc.	...do....
19:-	Tauqir s/o Faqir Mohammad, R/o Dobather, Abbottabad.	GPS Chamber No.1	...do....
20:-	Mohammad Hashir s/o Abdul Jabbar, R/o Pagran (Sherwan) Abbottabad.	GMPS Makri.	...do....
21:-	Liaqat Khan s/o Anwar Khan, R/o Malkan, Havelian, A. Abad.	GPS Baswair.	...do....

PTO...2...

GPS Bahi (Tara)

- | | | | |
|------|---|---|------|
| 23. | Arifur-Rehman, s/o Abdul Wahab
R/o Beer Abbottabad. | GPS Dheri K... | |
| 24. | Mohammad Suliman s/o Mirzaman,
R/o Maira Mandroach, Abbottabad. | GPS Bagla Phallah | |
| 25.- | Adil Waseem s/o Abdul Aziz,
R/o Nawanshehr, Abbottabad. | GPS No.2 Chambeer | -do- |
| 26.- | Abid Hussain Shah s/o Farman Shah,
R/o Rich bhen, Abbottabad. | GMPS Kugri (Richbhen) | -do- |
| 27.- | Khan Afsar s/o Mohammad Zaman,
R/o Mochi kote, Abbottabad. | GMPS Keri (Berangali) | -do- |
| 28.- | Abdul Latif s/o Ghulam Yousaf,
R/o Chatri, Abbottabad. | GMPS Hullah | -do- |
| 29.- | Tahir Raza s/o Maqsoodur-Rehman,
R/o Beerangali, Abbottabad. | GPS Upper Berangali | -do- |
| 30. | Shoukat Zaman s/o Mohbat Khan
R/o Shingiri (S.N.Khan) Abbottabad. | GPS Bhat | -do- |
| 31.- | Waneed Khan s/o Wali Dad,
R/o Mandroah kalan, Abbottabad. | GPS Kutli Phalkote | -do- |
| 32.- | Mohammad Hazeem s/o Mohammad Akhtar,
R/o Kuthwal, Abbottabad. | GMPS Beengra | -do- |
| 33.- | Tahir Maroof s/o Mohammad Maroof Khan,
R/o Patheel, Sherwan, Abbottabad. | GPS Ballahar | -do- |
| 34.- | Mohammad Hafeez s/o Mohammad Rafique,
R/o Beer Abbottabad. | GPS K Charbat | -do- |
| 35.- | Mohammed Asim Khan s/o Mohammad Muslim Khan
R/o Nawanshehr, Abbottabad. | GPS Phalkote | -do- |
| 36.- | Sher Dad s/o Mohammad Sadiq,
R/o Badi Barseen, Abbottabad. | Mosq; Moh; Haji Muqarab Khan
GPS Barseen | -do- |
| 37.- | Gul khatib s/o Khani Zaman,
R/o Mohankalan, Abbottabad. | GMPS Begu Mujid Abad. | -do- |
| 38.- | Gulzeb s/o Mohammed Walyat,
R/o Nara, Abbottabad. | GMPS Dhakhan Majuhan | -do- |
| 39.- | Mohammad Azeem s/o Azizur Rehman
R/o Chamial, Abbottabad. | GPS Pattan Kalan | -do- |
| 40.- | Mohammad Iqbal s/o Mohammad Ashraf,
R/o Lower Malikpura Abbottabad. | GPS Kammar Bandi | -do- |
| 41.- | Saeed Akhtar s/o Mohammad Siddique,
R/o Gerd Saha, Abbottabad. | GPS Kund Battal | -do- |
| 42.- | Abdul Basit s/o Mohammad Yaqub,
R/o Jahrian, Abbottabad. | GMPS Kherian | -do- |
| 43.- | Anees Mohammad s/o Mohbat Khan,
R/o Badi Dhank Abbottabad. | GMPS Panna Pattan | -do- |
| 44.- | Ghulam Mujtaba s/o Abdul Jabbar,
R/o Banda Nabi, Abbottabad. | GMPS Jogo Mar (Langrial) | -do- |
| 45.- | Tahir Hameed s/o Abdul Hameed,
R/o Nawanshehr, Abbottabad. | GMPS Lower Pond | -do- |
| 46.- | Ajma Khan s/o Mohammad Sultan,
R/o Nawanshehr, Abbottabad. | GMPS Julgran No.1 | -do- |
| 47.- | Altaf Hussain s/o Zardad Khan,
R/o Banda Jalal Khan, Abbottabad. | GMPS Julgran No.2 | -do- |
| 48.- | Mr. Rashid s/o Mohammad Ramzan,
Bandi Maira, Abbottabad. | GMPS Koklian | -do- |
| 49.- | Zareen Ahmad /so Khani Zaman,
R/o Talhar Abbottabad. | GPS Sial (Male)
Abbottabad. | |
| 50. | Mohammad Ilyas s/o Khani Zaman
R/o Gatraki, Abbottabad. | | |

- ag ziz s/o zizur-Rehman
N. Khan Abbottabad. GMPS Noorpur (Lora) against vct:
rest.
- Abdul Waheed s/o Mian Khan,
R/o Charnakka, Abbottabad. GPS Dannah; "do.....
- 53.- Zahid Ikram s/o Sultan Mohammad,
R/o Samaser, Abbottabad. GMPS Palian (Loran)do.....
- 54.- Mohammad Naeem s/o Mohammad Rafique,
R/o Patsel, Abbottabad (Sherwan). GPS Banda Muglan.do....
- 55.- Mehtabur-Rehman s/o Abdul Gani,
R/o Kachhi, Abbottabad. GMPS Dairi soha.do.....
- 56.- Rashid Waheed s/o M. Zaman Khan,
R/o Patsel, Abbottabad. GMPS Amgha.do.....
- 57.- Sohail Ahmad s/o Aurang-Zeb,
R/o Kawaskehar, Abbottabad. GMPS Barlu.do.....
- 58.- Mohammad Sajid s/o Khani Zaman,
R/o Dewli Bani, Abbottabad. GMPS Khushal-Abad.do.....
- 59.- Arshad Khan s/o Safdar Khan,
R/o Havelian, Village. GMPS Dhamial.do.....
- 60.- Gul Paraz s/o Khani Zman,
R/o Pungra. GMPS Bagha.do.....
- 61.- Mohammad Shafique s/o Ali Zman,
R/o Pehal. GMPS Giar.do.....
- 62.- Mohammad Manzoor s/o Mohd Aksar,
R/o Phallah, Abbottabad. GPS Trala Bagla.do.....
- 63.- Ayyaz Hussain s/o Ghulam Sarwar,
R/o Nawan-shehr, Abbottad. GPS Karraga.do.....
- 64.- Mohammad Younis s/o Gulzaman,
R/o Dalala, Abbottabad. GMPS Ratwali.do.....
- 65.- Sajjad Ahmad s/o Fazalur Rehman,
R/o Batangi (Bhuraj) Abbottabad. GPS Mal Moola.dp.....
- 66.- Mohammed Ishtaq s/o Mian Dad,
R/o Banda Qazi, Abbottabad. GPS Banda Said Khan.do.....
- 67.- Matin-Rehman s/o Ghulam Nabi,
r/o Sajjokote, Abbottabad. GPS Danna Nurai.do.....
- 68.- Shah Qasim s/o Ayub Shah,
R/o Takia Abbottabad. GPS Sera (Lora).do.....
- 69.- Mohammad Harif s/o Ghazi Khan
R/o Richa Eren, Abbottabad. GMPS Simber.do.....
- 70.- Mohammad Tariq s/o Ali Zaman,
R/o Sambli, Abbottabad. GPS Majoot.do.....
- 71.- Akhlaq Hussain Shah s/o Mehtab Shah
R/o Ranjan, Abbottabad. GMPS Boverri.do.....
- 72.- Mohammad Muntaz Khan s/o
Khan Mohammed R/o
Pind Kargakhan, Abbottabad. GMPS Ghake-Nali.do.....
- 73.- Gul Nisar s/o Ali
Zaman, R/o
Khukriala,
Abbottabad. GPS Gehar.do.....
- 74.- Mohammad Shahid,
s/o Moammad Hussain,
R/o Nawan-Shehr,
Abbottabad. GPS Darra Akhzeela.do.....

75.	Sher Bahader S/O Mohd Rafique R/O Halalia Abbottabad.	GPS Namakmaira	
76.	Mohd Anwar S/O Mohd Yaqub R/O Karachi Abbottabad.	GMPS Gadda Sinjala	-do-
77.	Tariq Javed S/O Said Akbar R/O Chatri Abbottabad	GPS Jandar Bari	-do-
78.	Jamshad Awan S/O Mohd Yunis R/O Rehmat Abad A. Abad.	GPS Narhotar	-do-
79.	Mohd Ishfaq S/O Mohd Yusuf Sherwan Abbottabad	GMPS Boga	-do-
80.	Mohd Fiaz S/O Mohd Yusuf R/O Jabrian Abbottabad	GPS Darra Majath.	-do-
81.	Aurangzeb S/O Abdur Rehman Kukmong Abbottabad	GPS Khai Bagla.	-do-
82.	Tariq Mahmood S/O Mohd Ashraf R/O Behakki Abbottabad	GPS Banda Mughlan	-do-
83.	Mohd Rustan S/O Gul Zaman R/O Talkandi Abbottabad	GMPS Khukhrialala	-do-
84.	Zahid Hussain S/O Abdul Hannan R/O Nagri Bala Abbottabad	GMPS Samloi	-do-
85.	Khawaj. Mohd S/O Bahader Khan R/O Bandi Qazi	GPS Mian	-do-
86.	Ghulam Abbass S/O Fareedud. Din R/O Havelian City	GPS Kohalian	-do-
87.	Ihsanul Haq S/O Aminul Haq R/O Lalola Abbottabad	GMPS Ratwali Syedan	-do-
88.	Khalid Javed S/O Khalilur Rehman R/O Dhantaur Abbottabad	GPS Taghan	-do-
89.	Shakeel Khan S/O Mohd Aslam R/O Maira Battang Abbottabad	GPS Bagh	-do-
90.	Attiqur Rehman S/O Mohd Idrees R/O Dakhan Sangal A. Abad	GPS Dhakhan	-do-
91.	Mohd Yusuf S/O Samunder Khan R/O Gali Meeran Abbottabad	GPS Sangrazi	-do-
92.	Khalilur Rehman S/O Mohd Miskeen R/O Sambli Abbottabad	GMPS Danna Drair.	-do-
93.	Abdur Razaq S/O Mohd Bashir R/O Beerote Abbottabad	GMPS Hutrapi	-do-
94.	Nazeer Ahmad S/O M. Miskeen R/O Puck Abbottabad.	GPS Awar Whairgali	-do-
95.	Gulzamar Khan S/O Dilawar Khan R/O Kiala Abbottabad	GPS Bissan Lora.	-do-
96.	Ali Mardan S/O Khani Zaman R/O Sambli Abbottabad	GPS Rankote	-do-
97.	Mashkooor Ahmad S/O Fazal Khan R/O Mehra Berote Abbottabad	GPS Lahoor	-do-
98.	Adnan Ahmad S/O Masoodur Rehman R/O Salhad Abbottabad	GPS Mohra Jhngra	-do-
99.	Shakeel Mohd S/O Mohd Miskeen R/O Pluck Abbottabad	GMPS Seri Loongal	-do-
100.	Ishtiaq Hussain S/O Ghulam Hussain R/O Lalola Abbottabad	GPS Nakar Khan Kalan	-do-

101.	Gul Aeed S/O Shah Zamana R/O Nagri Balaha Abbottabad	GPS Banwari	Against Vacant PTC Post.
102.	Mohd Muntaz S/O Mohd Bashir Nammal Abbottabad	GPS Ali Abad	-do.
103.	Mohd Farooq S/O Mohd Iqbal R/O Bandi dhundan Abbottabad	GMPS Barreetha	-do-
104.	Rashid Mehmool S/O Azizur Rahman R/O Dhantuar Abbottabad	GMPS Kinarian	-do-
105.	Mohd Saleem S/O M. Yaseen R/O Talkandi Abbottabad	GPS Sailkote	-do-
106.	Mohd Arif S/O Qalander Khan R/O Naroka Abbottabad	GPS Bali Kote	-do-
107.	Ghulam Dastageer S/O Ghulam Mustafa R/O Shaikhul Bandi Abbottabad	GPS Chari Lora	-do-
108.	Mohd Farooq S/O Mohd Afsar R/O Bandi Dhundan Abbottabad	GPS Chankote	-do-
109.	Abdul Sattar S/O Mohd Zaman R/O Mohri Kaira	GMPS Ratwali	-do/
110.	Safdar Hussain Shah S/O Altaf Hussain Shah R/O Khan Perote	Gps Kiala Ratangi	-do-
111.	Mohd Shakeer S/O Abdur Rehman R/O Gali Kaira (Maeran)	GMPS Jandran	-do-
112.	Gohar Rehman S/O Mohd Eostan R/O Khan Kaira Abbottaba	GPS Seri Khan Kalan	-do
113.	Khurshid Ali S/O Kala Khan R/O Nagri Balaha Abbottabad	GPS Surjal	-do
114.	Mohammad Ali S/O Mohd Saleman R/O Surma Abbottabad	GPS Sumba Karaga	-do-
115.	Waseem Akhter S/O Mohd Maseer R/O Julal Abbottabad	GMPS Navelay	-do-
116.	Tahir Gul S/O Mohd Miskeen R/O Upper Malihatta A. Road	GPS Ghambeer No.1	-do-
117.	Abdul Manan S/O Abdur Rahim S R/O Majuhan Abbottabad.	GPS Tarach	-do-
118.	Mohd Riaz S/O Jalal Khan R/O Dhodial Nawansher	GMPS Nerian ghar	-do-
119.	Shaid Iqbal S/O Shamroz Khan R/O Narrian Abbottabad	GPS Surjal	-do-
120.	Mohd Safer S/O Mohd Yaqub R/O Dheri Malikpura Abbottabad	GMPS Kalu Lupri	-do-

- CONDITIONS. All/appointments made under all services conditions laid down
1. by the Govt; from time to time on merit basis.
 2. All the newly appointed candidates are directed to provide their original Qualificational Certificates to the S.DEO(M) Abbottabad and Concerned ADEOs for checking before preparation of their Age and Health Certificate Form.
 3. The overage candidates will get their pay after the proper Sanction to the Relaxation of Age limit from the Competent authority.
 4. A.S.D.E.O.s concerned are directed to pointout the cases of overage candidates of their beats immediatly and their cases should be prepared on the prescribed form alongwith relevent necessary documents and sent to the appointing authority for further necessary action.
 5. The prescribed age for PTC post is 25 years, if a candidate is under age/18 years charge may not be handed over to him
 6. At the time to preparation of their Service books a set of Qualifications Certificates etc, should be pasted in their Persol Files/Service books for record.
 7. They are directd to submit their charge reports to all Concerned.

Sd/ x x x x x
(SARDAR MOHAMMAD AYUB)
District Education Officer(Male)
Primary Abbottabad.

5115- 5240/ AE-I/PTCs/Appointments/Dated 20.10.1994.

- is forwarded for information and necessary action to the:-
1. Director Primary Education N.W.F.P. Peshawar.
 2. Sub Divisional Education Officer(M) Abbottabad.
 3. All Candidates concerned.
 4. All Concerned ASDEs, Abbottabad Sub;Div;Abbottabad.

G. M. Ayub
(SARDAR MOHAMMAD AYUB)

DISTRICT EDUCATION OFFICER(MALE)
PRIMARY ABBOTTABAD.

Dist. Govt. NWFP-Provincial
District Accounts Office Abbotabad
Monthly Salary Statement (November-2019)

⑩
Annex 'B'



Personal Information of Mr MUHAMMAD ISHFAQ, d/w/s of MUHAMMAD YOUSAF

Personnel Number: 00009474 CNIC: 1310108847513 NTN: 0
Date of Birth: 08.04.1974 Entry into Govt. Service: 23.10.1994 Length of Service: 25 Years 01 Months 009 Days

Employment Category: Vocational Permanent

Designation: PRIMARY SCHOOL TEACHER 80000364-DISTRICT GOVERNMENT KHYBE

DDO Code: AD6127-DY DISTT OFFICER (M) PRY ATD

Payroll Section: 003

GPF Section: 001

Cash Center: 07

GPF A/C No: EDU 018098

Interest Applied: Yes

GPF Balance:

241,469.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 13

Pay Stage: 17

Wage type		Amount	Wage type		Amount
0001	Basic Pay	32,110.00	1000	House Rent Allowance	2,091.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1968	Incentive Allowance 20%	1,000.00	2148	15% Adhoc Relief All-2013	700.00
2199	Adhoc Relief Allow @10%	493.00	2211	Adhoc Relief All 2016 10%	2,513.00
2224	Adhoc Relief All 2017 10%	3,211.00	2247	Adhoc Relief All 2018 10%	3,211.00
2264	Adhoc Relief All 2019 10%	3,211.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3013	GPF Subscription	-2,400.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-116.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	130,000.00	-3,612.00	39,700.00

Deductions - Income Tax

Payable: 1,737.46 Recovered till NOV-2019: 493.00 Exempted: 434.14 Recoverable: 810.32

Gross Pay (Rs.): 52,896.00 Deductions: (Rs.): -7,453.00 Net Pay: (Rs.): 45,443.00

Payee Name: MUHAMMAD ISHFAQ.

Account Number: 1262-0

Bank Details: NATIONAL BANK OF PAKISTAN, 231822.NBP, TAKIA HALL BALUCHI, Abbottabad

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: ATD

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: muhammad.ishfaqpst@gmail.com



12

Part - II

Annex "C"

Session: 2016 (Annual)

PROVISIONAL & DETAILED MARKS CERTIFICATE

Roll No: 41085

Group: HUMANITIES

Name: MUHAMMAD ASHFAQ

Father Name: MUHAMMAD YOUSUF

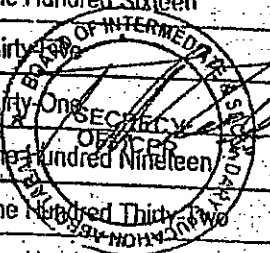
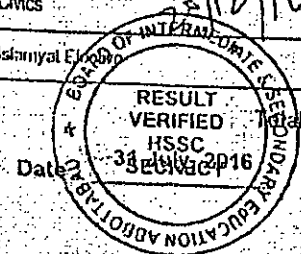
Reg No: 5469AB/AD-intMP15

Institution/ District: ABBOTTABAD



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

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	54	-	36	-	90	Ninety Only
Urdu (Comp)	200	68	-	48	-	116	One Hundred Sixteen
Islamic Compulsory	50	35	-	-	-	35	Thirty Five
Pakistan Studies	50	-	-	31	-	31	Thirty One
Islamic History	200	70	-	49	-	119	One Hundred Nineteen
Civics	200	66	-	66	-	132	One Hundred Thirty Two
Islamic Education	200	67	-	57	-	124	One Hundred Twenty-Four
						1100	
						647-C	Six Hundred Forty-Seven Only



Checked By: [Signature]

[Signature]
Controller of Examinations

Note: Errors / Omissions excepted. Any error in Name, Father Name etc must be intimated within 30 days after declaration of result (31-07-2016). Visit us: www.biseatd.edu.pk
104 GOVT. COLLEGE SHERWAN ABBOTTABAD

ANNEXURE

ANNEXURE

"D"

13

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SE/EE/14-SSRC/Meeting/2012/Training Cadre: In pursuance of the provisions combined in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Service (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. Dtd 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.

APPENDIX

1. Nomenclature of the post.	2. Minimum qualification and experience for initial appointment or by transfer.	3. Age limit.	4. Method of recruitment.
Secondary School Teacher (BPS-16)	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty 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.

			<ul style="list-style-type: none"> (iv) one per cent from amongst Instructional Material Specialists with atleast five years service such and having qualification mentioned in column No. 3; and (v) one per cent from amongst Arabic Teachers with at least five years service as such and have qualification mentioned in Colur No.3; and <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)		By promotion, on the basis of seniority-cur fitness, from amongst Arabic Teachers, with least five years service as such and havin qualification as prescribed for init recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16)		By promotion, on the basis of seniority-cur fitness, from amongst Theology Teachers, wi at least five years service as such and havin qualification as prescribed for initial recruitme of Theology Teacher.
4.	Senior Certified Teacher (SCT) (General) (BPS-16)		By promotion, on the basis of seniority-cur fitness, from amongst Certified Teache (General), with at least five years service as su and having qualification as prescribed for init recruitment of Certified Teacher (General).

	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.

		(i) Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamiya Fil Uloomul Arabia wal Islamiya from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (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 Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. Note: 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>
14.	<p>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</p> <p>(b) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>

	<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 the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority cum fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p>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 Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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	any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		<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>
16. Certified Teacher (Home Economics) (BPS-15).	<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>	18 to 25 years.	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics).</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p>

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		University with one year vocational training from any Government training center or institute with nine months training from Government Agro. Technical Teacher Training center of the level of certified Teacher Agro-Technical (Home Economics).		<p>Certified Teacher (Home Economics).</p> <p><u>Note:</u> In case of non-availability of suitable person for promotion, then by initial recruitment.</p>
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed in initial recruitment of Drawing Master.</p> <p>Provided that if no suitable candidate is available for promotion on the basis of seniority-cum-fitness from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>

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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 (PSHT) (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.

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

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 = ____
B.A./B.Sc	Marks obtained X 20 / total marks = ____
M.A. Arabic / Shekhatul Ma'arif Fil Uloomul Arabia wal Islamiya from a recognized Faizimatal Wafaqul Ma'arif	Marks obtained X 20 / total marks = ____
Other MA/M.Sc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
M.Phil/Ph.D	Marks = 05

Theology Teacher

Category of Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
B.A./B.Sc	Marks obtained X 20 / total marks = ____
M.A. Islamic / MA Edu	Marks obtained X 20 / total marks = ____
M.A. Islamia / Shekhatul Ma'arif Fil Uloomul Arabia wal Islamiya from a recognized Faizimatal Wafaqul Ma'arif	Marks obtained X 15 / total marks = ____
M.Phil/Ph.D	Marks = 05

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Qual/Qualia

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
Qim Scored from a recognized Institution.	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
B.A/BSc	Marks obtained X 30 / total marks = ____
MA/MSc/M.Ed/M.A Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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

Category of Qualification	Total Marks 100 For Humanities group of Intermediate/Graduation Level	For Candidate of Sciences group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for B.Sc. 5 Extra marks for B.A. 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/BSc	Marks obtained X 20 / total marks = ____	
CT, Certificate/Diploma in Education /AIDE	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed/M.A 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	

خدمت جناب D-E.O (M) صاحب ایڈ آف آفیس آف

درخواست بہرائے تقویٰ و فرائے جانے اپیل کے
کثیت حکمانہ اپیل و فیصلہ فرمائے براہ اپیل
مسائل و طالب فیصلہ عدالت عالیہ لٹنادر
بنج ایڈ آف آفیس آف عدالت عظمیٰ پاکستان
بحوالہ 19/8-1008 WP No و 2009 SC MR OI

جناب عالی: درخواست نزل گزارش ہے۔

1. یہ کہ سائل کثیت PST گورنمنٹ پرائمری
سکول میں تعینات ہے اور اپنی دیوتی سر انجام
رہے و یا ہے۔

2. یہ کہ سائل نے اپنی فائل پر تازہ اپ گریڈیشن سے اپنے
جناب عالی کے آفس میں جھگڑائی کے سائل کو مطالبی
یالیسی 2013 کے سائل کو اپ گریڈ کیا جائے
مگر سائل کی فائل اس وجہ سے واپس کر دی
گئی کہ سائل یالیسی کے مطالبی اپ گریڈیشن سے اپنے
تعلیمی قابلیت BA ہے۔

3. یہ کہ مطالبی قانون و مطالبی نوٹیفیکیشن 2013 سائل
اپ گریڈیشن کا اہل تھا جبکہ سائل پر 2018
کی یالیسی کسی طور پر لاگو نہ ہوئی ہے اسے بھی نام
عدالت عالیہ لٹنادر پنج ایڈ آف آفیس آف عدالت عظمیٰ
فیہ 19/8-1008 دائری کی جس میں عدالت عالیہ نے ہولڈ
فرمایا کہ محمد سائل کی دائری فرمائے اور قانونی مفاد
کے اندر سائل ان کے کیس کا فیصلہ کرے۔

4. یہ کہ مذکورہ بالا دائرے پیش جمع Same subject matter
کی سائل اور سائل کا کیس جمع و یہی ہے جو کہ
مذکورہ بالا دائرے پیش میں قانونی نفاذ لگانے
کے لیے اس لیے جناب عالی سے التماس ہے
کہ سائل کی درخواست کو منظور فرمائے۔

لفور فرمائے ہوئے سائل کے ایس جی نیصلہ فرمایا جاوے
اود حالینہ DPCC میں سائل کا نام ڈالا جائے۔

ایس ڈی اے ماہرینہ
representative
کی درخواست کو Departmental
لفور فرمائے ہوئے سائل کی
داد دہی فرمائی جاوے۔

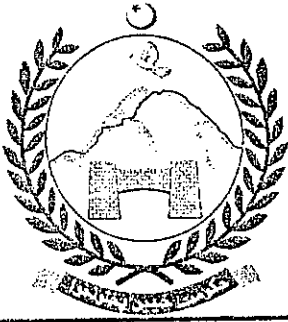
08/10
2019

محمد عثمان ولد محمد یونس SPST دہرا باند لیو وکیل خود

محمد عثمان ولد محمد یونس

Muhammed Liaqat
Advocate

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD



Annex "F"

No. 13052 /ADEO LIT

Dated: 18 /12/2019

28



0992-9310102, 0992-330131



EDO.Education.Atd@gmail.com

To

1. Mr. Muhammad Idrees PST GPS Malsa, Abbottabad
2. Mr. Tanveer Ahmed PST GPS Sabil, Abbottabad
3. Mr. Muhammad Ashfaq SPST GPS Khanda Khu, Abbottabad

Subject: **DECISION ON DEPARTMENTAL REPRESENTATIONS**

With reference to your applications received through Legal Notice No. 005 dated 07-10-2019, undersigned examined the case of the applicants thoroughly.

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

-sd-
District Education Officer (M)
Abbottabad.

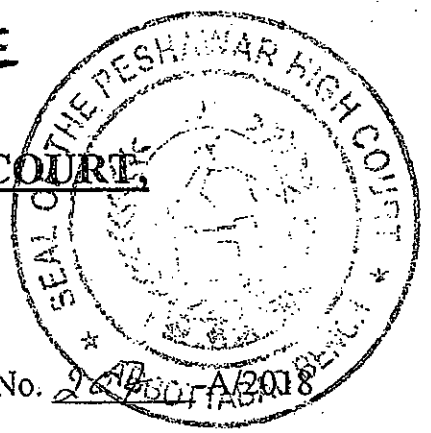
Copy forwarded for information to the:-

Mr. Muhammad Liaqat Advocate High Court office No. 44 Ayub Tanoli Lawyers Plaza District Courts Abbottabad.

[Signature]
District Education Officer (M)
Abbottabad.

39 ANNEXURE
"G"

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH



Writ Petition No. 2018/AB/2018

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.

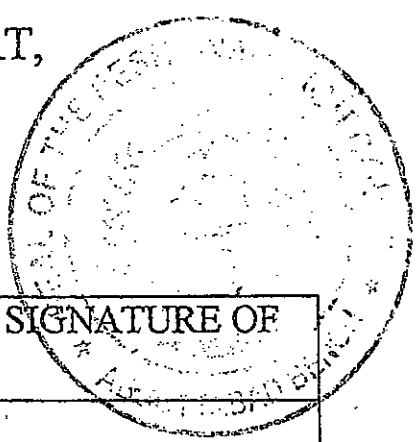
...RESPONDENTS

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

No. 1042
217/18
Certified Copy
Peshawar High Court & Bench
Authorized Under Sec. 75 of Ordns.

[Handwritten signature]

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
07.11.2018	<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</p> <p>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>

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Handwritten mark or signature at the bottom left of the table.

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 Atd. Bench
Authorized Under Sec: 75 Evid Ordns.

Tufail/*

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



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

No. / Dated / / 2018

Near: Government Shohaed 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 concerned DEOs and also a copy of it may also be provided to the chair. The chairs 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**

PIF: 091-9225314 / Fax: 091-9225315 Email: sof@dpes.gov.pk

No. _____ Dated ___/___/2018

Near: Government, Shoheed 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 75% 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 submit 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 P&D 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-1 for developmental schemes Deputy Director P&D suggested the DEOs to send 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 via 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 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 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 ones) please type "Follow Dir. E&SE KP" in your mobile message & send it to "40101" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.



36

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA
Tel: 091-9225314 / Fax: 091-9225315 Email: zulfiqaribautka@gmail.com

No. _____ Dated: 17/11/2018

Near: Government Shohed Hussain Sharif Baloch Secondary School No-1 City Peshawar.

11	Posting/ Transfer of NTS appointed teachers	The chair directed to implement vadlock 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 buildings/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 focal person with DD P&D immediately	

5742-93

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

Encls: No. _____ Meeting minutes/DPES-1/ Dated: 16/11/18

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 of E&SE department & other interested ones please type yellow on 'E&SE' in your mobile phones & dial to 46402 to get free news of Directorate of E&SE Khyber Pakhtunkhwa 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 founds 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 GGHSSs 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

NOTIFICATION

37

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
	Babū Jehangir	SDEO (M) Abbottabad	PST to SPST	01-3/10/2019	DEO (M) Office
	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
	Abdul Qayyum	SDEO (M) Havelian	SPST to PSHT	do	do
	Arshad Mehmood	ADEO (E) Primary			
	Syed Mehmood ul Hassan	ASDEO Circle Havelian	do	do	do
	Muhammad Saeed	B&AO Local Office	do	do	do
	Asif Khan	ASDEO Circle Dhamtour	do	do	do
	Muhammad Zaman	Assistant Local Office	do	do	do
3	Mahroof Khan	SDEO (M) Lower Tanawal	PSHT to CT DM P-T	do	do
	Zubair Ali	ASDEO Circle P.K.Khan	do	do	do
	Irshad Ali	ASDEO Circle Nathla Gali	do	do	do
	Rab Nawaz 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 16/10/2019

Order No. 1764/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

کورٹ فیس

وکالت نامہ

بعدالت سروس ٹریڈنگ لیسٹ اور کیمپ ورث ایٹ آباد

عنوان: محمد اشفاق بنام گورنمنٹ آف اے. پی. اے. ۱۰۰

منجانب: ایبل انٹ

نوعیت مقدمہ:

باعث تحریر آنکہ

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

محمد اشفاق ایڈووکیٹ ہائی کورٹ ایٹ آباد

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

بجائے 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 جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

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

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

Attest.

Accepted

المرقوم: ۲۵/۱۲/۲۰۱۸

السید عبد

السید عبد

لجودالت جناب جسٹس شریونجلی KPLA لیٹا در

محمد اشفاق نام گورنمنٹ KPLA دفتر

درخواست - میرا صدور حکم سماعت ایسے منجم
لیٹا در جو *urgent matter* مابعد صدر
قدمانے تاریخ برائے ایک کو درج ایسے صادر

جناب عالی یہ درخواست زیل ہے۔

ایسے میں عنوان زیر سماعت شریونجلی میں ہیں
جو کہ ایک گورنٹ ایسے صدر کے لیے مورف
21/2/2020 کے بعد صدر شدہ ہیں۔

22-2-2020 ایسے عنوان میں *ماتر* *involve* ہے
جناب سے درخواست ہے کہ ایسے عنوان منجم لیٹا در کے لیے
صدر فرمائے جاویں۔

لیٹا در درخواست پیش ہے
صبر شریونجلی صدر
فرمایا جاوے

Hearing be accelerated
to 13/1/2020 at
Peshawar.

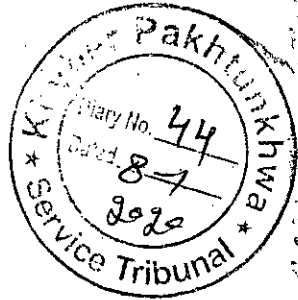
08/01/20
المسرفوم

محمد اشفاق (اپڈاٹ) نذر لیم وکیل قو
کھڑا

Noted
10/1/20
8/1/20

عدالت ضابطہ سروس ٹریبونل پاکستان اسلام آباد

محمد اشفاق نام گورنمنٹ ونگ



درخواست نمبر 148 و حکم جلد 100 حالت اپیل عنوان
بوجہ Urgent Matter و صدور حکم شروع Status
بر درخواست ایدانٹ

جناب عالی، درخواست ذیل ہے۔

1۔ یہ کہ ایچ بی بی عنوان زیر حالت عدالت پذیرا ہے جس
آئندہ پیشی مورخہ 07/08/2020 سے شروع ہوگی۔

2۔ یہ کہ اپیل عنوان میں ایدانٹ نہ درخواست Status
گزاری ہے اور اپیل میں Status کا Matter
منصوب ہے۔ جس تاریخ تہت ہی صدر
قواعدی ہے۔

3۔ یہ کہ اپیل عنوان میں ایدانٹ نہ درخواست
Status ہے۔ گزارا ہی ہے اگر ایدانٹ کی درخواست
پر کوئی حکم صادر نہ فرمایا گیا تو ایدانٹ کی اپیل
ماتحت قوت ہو جائے گا اور ایدانٹ کو تاویل
دلانی نقصان ہوگا۔

لہذا استدعا ہے کہ ایچ بی بی
جلد حالت فرمائی جائے درخواست
ایدانٹ پر حکم صادر فرمایا جائے

المترجم 08/7/2020

محمد اشفاق (ایدانٹ) پتہ ریلوے ٹیٹو

111/44

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

Appeal No. 2234/2019

Muhammad AshfaqAppellant

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. 2234/2019

Muhammad AshfaqAppellant

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

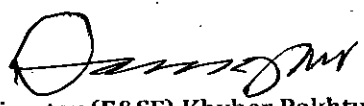
Bachelor Degree whereas; appellant do not fulfill the requisite qualification.
(Copy of Notification dated 30-01-2018 is annexed herewith as annexure "A").


Grounds:

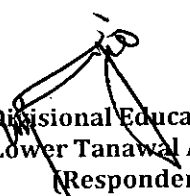
- a. That ground a, as composed is incorrect hence, denied. Impugned order dated 18-12-2019 is in accordance with the Law and Policy.
- b. That ground b, as composed is incorrect hence, denied. As replied in Para 4 of Factual Objections.
- c. That ground c, as composed is incorrect hence, denied. As 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. 2234/2019

Muhammad AshfaqAppellant

VERSUS

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

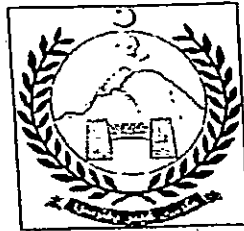
JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

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**

Ans "A"
064

NOTIFICATION

Peshawar, dated the 30th January, 2018.



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";

Sirajuddin
ADOLE
For Compliance
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).	
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(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/B/C/D*
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)