

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No.38/2019

Date of Institution ... 04.01.2019  
Date of Decision ... 08.11.2021

Bacha Khan (Certified Teacher) (BPS-15) Government High School Sur Kamar, District Charsadda.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar and four others.

... (Respondents)

Muhammad Iqbal,  
Advocate

... For appellant.

Muhammad Adeel Butt,  
Additional Advocate General

... For respondents.

Ahmad Sultan Tareen  
Rozina Rehman

... Chairman  
... Member (J)

**JUDGMENT**

Rozina Rehman, Member(J): Brief facts of the case are that appellant was appointed as Certified Teacher at GMS Qalagai, Mohmand Agency. He was transferred to District Peshawar and then to G.H.S Zahid Abad District Charsadda on 07.02.2012. He was not considered for promotion despite repeated requests, hence, the present service appeal.

2. We have heard Muhammad Iqbal Advocate learned counsel for appellant and Muhammad Adeel Butt, learned Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

3. Muhammad Iqbal Advocate, learned counsel for appellant submitted that the appellant is highly qualified having Master Degree in Political Science and an experience of more than 23 years in Education Department. He submitted that the appellant has been serving on the post of C.T since inception of his service in the year 1994 and he was ignored which is not warranted by law. He submitted that the touchstone and rules regarding keeping a civil servant at the bottom of the seniority list after transfer to another district is an open and brazen violation of the fundamental rights of the civil servants and that the appellant being appointed initially in Mohmand Agency was later on transferred to Peshawar and then to District Charsadda by the competent authority without consent of the appellant and lastly he submitted that the seniority was requested to be maintained at the place where the appellant was initially appointed i.e. Mohmand Agency because the appellant remained in the same department and remained under the same authority for more than two decades and thus by throwing the appellant to the bottom of seniority list is tantamount to spoil the career of the appellant.

4. Conversely, learned A.A.G submitted that the appellant may be highly qualified but he is at the bottom of the seniority list, therefore, cannot be promoted. He submitted that the appellant was transferred from FATA Directorate to District Peshawar on his own choice while possessing the District Cadre Post. Lastly, it was argued that the seniority of the appellant has been placed at his proper place with the counterparts in District Charsadda and now he is at Serial No.332 because of his several transfers from Mohmand Agency to District Peshawar and then to District Charsadda.

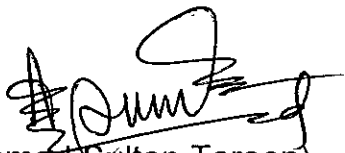
5. From the record it is evident that upon the approval of Departmental Selection Committee, the preset appellant Mr. Bacha Khan alongwith four others were appointed as C.T vide appointment/adjustment order dated 15.12.1994. He is a highly qualified teacher which is not denied. He was transferred/adjusted from Mohmand Agency to GHS Sarband Peshawar on 30.09.2003. Vide office order dated 12.05.2011, he was transferred from GHS Sarband Peshawar to G.H.S.S Peshawar Cantt. Upon the approval given by the competent authority in relaxation of ban, present appellant was transferred from G.H.S.S No.1 Peshawar Cantt. to GHS Zahid Abadd District Charsadda vide office order dated 07.02.2012, wherein, it has been clearly mentioned that his seniority will be determined at the bottom of seniority list under the rules. He was then transferred from GHS Zahid Abad to GHS Sur Kamar on 15.11.2014. His name was included in the seniority list w.e.f 29.02.2012 as per rules and policy. This entry in the office order bearing endorsement No.393-98 dated 07.02.2012 was never challenged by the appellant and he submitted an application in respect of his promotion to the post of S.S.T to the Director Elementary & Secondary Education which is undated and is available on file but from the contents of the said application in form of departmental appeal, it is evident that the same was submitted when the appellant was serving in GHS Sur Kamar, Charsadda and as per transfer order dated 15.11.2014 appellant was transferred from GHS Zahid Abad to GHS Sur Kamar. It means that after determination of his seniority at the bottom of the seniority list under the rules in the year 2012, properly communicated to the

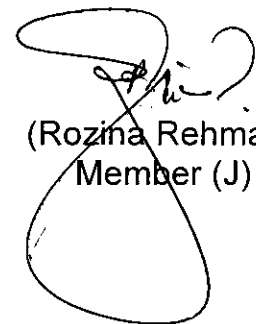



appellant was assailed in the year 2014 while the present service appeal was filed in the year 2019.

6. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.  
08.11.2021

  
(Ahmad Sultan Tareen)  
Chairman

  
(Rozina Rehman)  
Member (J)

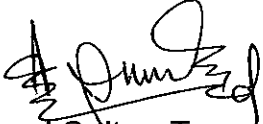
Order  
08.11.2021

Appellant present through counsel.

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

Vide our judgment of today of this Tribunal placed on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

Announced.  
08.11.2021

  
(Ahmad Sultan Tareen)  
Chairman

  
(Rozina Rehman)  
Member (J)

16.09.2021

Appellant present through counsel.

Muhammad Adeel Butt learned A.A.G for respondents present.

Arguments heard. To come up for order on 08.11.2021 before D.B.



(Rozina Rehman)  
Member (J)



Chairman

38/2019

Postscript

26.05.2021

The order dated 24.03.2021 was written but could not be signed by the D.B including the then Chairman who due to unforeseen reason could not attend the office in coming days. He died in the meantime and the order sheet was left unsigned. To bring the proceedings of appeal on track, it is become expedient for ex-post facto completion of the order sheet. The unsigned order dated 24.03.2021 is reproduced below which be given effect accordingly:-

"Counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Learned counsel seeks time to further prepare the brief. Adjourned to 01.06.2021 for hearing before the D.B."

  
(Atiq-ur-Rehman Wazir)  
Member


  
Chairman

01.06.2021

Appellant with counsel present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Bench is incomplete as learned Member Executive (Mian Muhammad) is on leave. A request was made on behalf of learned counsel for appellant that the respondents may be directed to place on record inter District Transfer Policy/Rules, if any. As such respondents are directed to produce the same before date and case is adjourned to 16.09.2021 for record/arguments before D.B.

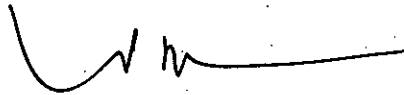
  
(Rozina Rehman)  
Member (J)

06.01.2021

Counsel for the appellant and Asstt. A.G for the respondents present.

Learned counsel for the appellant requests for time to submit an amended appeal in order to also impugn the order of departmental appellate authority dated 26.11.2018.

The request is allowed. Amended appeal may be submitted within two weeks. To come up for reply/arguments on 24.03.2021 before the D.B.



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



Chairman

24.03.2021

Counsel for the appellant and Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Learned counsel seeks time to further prepare the brief. Adjourned to 01.06.2021 for hearing before the D.B.

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

Chairman



24.02.2020

Appellant with counsel and Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 27.03.2020 before D.B.

  
Member

  
Member

27.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on ~~28.08~~ 25.08.2020 before D.B.

  
Reader

25.08.2020

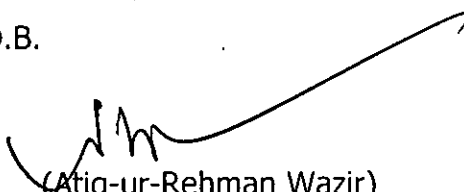
Due to summer vacation case to come up for the same on 29.10.2020 before D.B.

  
Reader

29.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 06.01.2021 for hearing before the D.B.

  
(Atiq-ur-Rehman Wazir)  
Member

  
Chairman

29.08.2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 10.10.2019 before D.B.

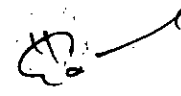
  
Member

  
Member

12.11.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 14.01.2020 before D.B.

  
Member

  
Member

14.01.2020

Appellant in person present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 24.02.2020 before D.B.

  
Member

  
Member

25.03.2019

Learned counsel for the appellant present. Written reply not submitted. No one present on behalf of respondent department. Notice be issued to the respondent department with the direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 24.04.2019 before S.B

  
Member


24.04.2019

Counsel for the appellant present. Adll: AG alongwith Mr. Wisal Muhammad, AEDO for respondents present. Written reply on behalf of respondent no.5 submitted, while respondents no. 1 to 4 rely on the same. Case to come up for rejoinder and arguments on 03.07.2019 before D.B.

  
(Ahmad Hassan)  
Member

03.07.2019

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 29.08.2019 for rejoinder and arguments before D.B.

  
(Hussain Shah)  
Member

  
(M. Amir Khan Kundi)  
Member

08.02.2019

Counsel for the appellant present.

Learned counsel contended that the appellant was appointed on 15.12.1994 and, after having put in service for more than 24 years, is still not promoted. The said act of omission and commission on the part of the respondents is attributable to the provisions of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules, 1989, which require to be declared ultra-vires to the fundamental rights guaranteed by the Constitution of Pakistan. It was added that the departmental appeal of appellant was rejected on 26.11.2018, wherein, the ground mentioned was to the same effect.

Instant appeal is admitted for regular hearing in view of arguments of learned counsel. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 25.03.2019 before S.B.



Approved  
Security & Process Fee

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 38/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/1/2019	<p>The appeal of Mr. Bacha Khan resubmitted today by Mian Uzairullah Jan 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>
2-	16-1-19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>8-2-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

P-40

The appeal of Mr. Bacha Khan C.T GHS Sur Kamar Charsadda received today i.e. on 07.01.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be flagged.
- 3- Annexures of the appeal may be attested.

No. 51 /S.T,

Dt. 8-1- /2019.

8/1/19  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr.M. Uzairullah/Jan Adv. Pesh.

The deficiencies have  
been rectified and  
re-submitted please.

Muzain  
(M. Uzairullah Jan  
Advocate Peshawar)

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

Service Appeal No. 38 /2019


**Bacha Khan (Certified Teacher)** (BPS-15), Government High School Sur Kamar,  
District Charsadda

**VS**

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat  
Peshawar and others

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4.	Copy of Transfer Order Dated: 12/5/2011	C	14
5.	Copy of Transfer Order Dated: 7/2/2012	D	15-15A
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Through <sup>Appellant</sup>  
  
**(Mian Muhammad Imran)**  
Advocate High Court

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

**Khyber Pakhtunkhwa  
Service Tribunal**

Service Appeal No. 38 /2018

Diary No. 57

Dated 4-1-2019

**Bacha Khan (Certified Teacher) (BPS-15), Government High School Sur Kamar,  
District Charsadda**

**VS**

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
2. Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat Peshawar
3. Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education (E&S Edu), Civil Secretariat Peshawar
4. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
5. District Education Officer (Male) (DEO), District Charsadda

**SERVICE APPEAL UNDER SECTION 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE REJECTION OF THE DEPARTMENTAL APPEAL DATED: 26/11/2018 WHICH WAS PREFERRED IN RESPECT OF PROMOTION TO THE POST OF "SST" KEEPING IN VIEW THE FACT THAT THE APPELLANT HAS BEEN APPOINTED ON THE POST OF "CT" ON 15/12/1994 AND SO FAR, HAS NOT BEEN PROMOTED DESPITE THE LAPSE OF MORE THAN ABOUT 24 YEARS ON THE SAME POST**

The appellant is pleased to beseech before this Honorable Tribunal as under;

1. That the appellant was appointed as "Certified Teacher" (CT) BPS-14 at "GMS Qalagai, Mohmand Agency" by the approval of departmental selection committee on 15/12/1994 and having on his credit M.Ed, Master of Political Science degrees. (Copies of Appointment Order, Pay Slip and Academic Documents are attached as F/A)
2. That after serving for more than about a decade in Mohmand Agency, the appellant was transferred to district Peshawar at "GMS Sarband" Peshawar from "GMS Qalagai" on 30/9/2003. (Copy of Transfer Order Dated: 30/9/2003 is attached as F/B)

**Filed to-day**  
**Registrar**  
**10/11/19**  
**Re-submitted to-day and filed.**  
**Registrar 10/11/19**



3. That after serving satisfactorily at "GMS Sarband, Peshawar", the appellant was transferred to "GHSS No. 1 Peshawar Cantt" on 12/05/2011. **(Copy of Transfer Order Dated: 12/5/2011 is attached as F/C)**
4. That it is indispensable to submit that the appellant was further transferred to "GHS, Zahid Abad, district Charsadda" on 7/2/2012 from district Peshawar and currently working at "GHS Soor Kamar". **(Copy of Transfer Order Dated: 7/2/2012 to District Charsadda is attached as F/D)**
5. That it is essential to submit that after the introduction of "The North West Province Employees (Regularization of Services) Act, 2009", dated: 24<sup>th</sup> October 2009, a number of contract employees were regularized due to which a number of regular teachers were peeved and aggrieved which resulted in filing of WP No. 2905/2009 in the Honorable Peshawar High Court Peshawar which was allowed. The operative part is reproduced below;

"In view of the above, this writ petition is disposed of in the following terms;

- (i) The Act, XVI of 2009, commonly known as (Regularization of Services) Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.
- (ii) Official respondents are directed to workout the backlog of the promotion quota as per above mentioned example, within 30 days and consider the in-service employees, till the backlog is washed out, till then there backlog is washed out, till then there would be complete ban on fresh recruitments.

**(Copy of Judgment in WP No. 2905/2009 is attached as F/E)**

6. That despite of the Judgment of the Honorable Peshawar High Court Peshawar, the appellant has not been considered for promotion keeping in view the factum that the appellant was appointed in the year 1994 but the appellant was ignored.
7. That the appellant due to his more than two decades of service, filed departmental representation to the Respondents regarding his promotion on 05/09/2018 which was rejected on the ground that the appellant was at serial no. 332 and could not be promoted. **(Copy of departmental appeal and rejection letter is attached as F/F)**
8. That as per the promotion policy, forty percent is to be promoted from amongst the CT (General) and others with at least five years service as such and having qualification as B.A and M.Ed or B.Ed which means the appellant is equipped with the required qualification and experience but the petitioner has not been promoted. **(Copy of the Recruitment Policy is attached as F/G)**
9. That the issue, which is raised by the Respondents is such that of seniority because the appellant has been kept at serial no. 332 in district Charsadda despite the fact that the appellant has served the education department for more

than 20 years in the same scale which is against natural justice. (Copy of Seniority List is attached as F/H)

10. That feeling aggrieved the appellant approaches this Honorable Tribunal on the following grounds inter-alia;

**GROUND:**

- A. That the act of the Respondents not to promote the appellant is against the fundamental rights, mandate of equity, natural justice and fair play.
- B. That the appellant is well equipped with the required education as he has done M.Ed and Master of Political Science as well as having experience of more than about 23 years in education department and has been serving on the post of "CT" since inception of his service in the year 1994, but despite this, the appellant has been ignored promotion which is not warranted by law.
- C. That it is also indispensable to say that the appellant remained in the same department i.e. education department and served as "CT" for more than 23 years and never been sent on deputation to other department or to other province but served in the same department then it is against the fundamental rights guaranteed by the Constitution of Pakistan 1973 to keep him in the bottom of the merit list in the district Charsadda.
- D. That even the Honorable Peshawar High Court Peshawar has also directed to workout the backlog of promotion quota but still the promotion of the appellant was ignored which is unwarranted by law.
- E. That the touchstone and rules regarding keeping a civil servant at the bottom of the seniority list after transferring to another district is an open and brazen violation of the fundamental rights of the civil servants especially when he performs in the same department with the fact that the appellant has been appointed initially in "Mohmand Agency" and later on transferred to Peshawar district followed by transferring to district Charsadda by the competent authority.
- F. That the seniority list was required to be maintained at the place where the appellant was appointed initially i.e. Mohmand Agency because the appellant remained in the same department i.e. education department and remained under the same authority for more than two decades so throwing the appellant at the bottom of the seniority list is tantamount to spoiling the career of the appellant.
- G. That any other ground can be raised at the time of arguments.

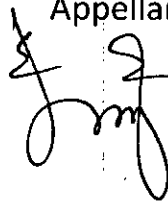
**PRAYER:**

In light of the foregoing submissions, it is therefore, most convivially and humbly prayed that on acceptance of this service appeal, this Honorable Tribunal may graciously be pleased to;

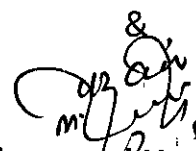
1. **Declare** the act/omission of the Respondents not to promote the appellant to the post of SSTis as unlawful, void ab-initio, against the mandate of constitution as well as violation of the fundamental rights guaranteed by the Constitution of 1973
  
2. **Declare** the rule/law regarding placement of a civil servant at the bottom of the seniority list after getting transferred from one district to other districtis as unlawful, void ab-initio, ultra vires to the fundamental rights guaranteed by the Constitution of Pakistan 1973, and liable to be declared un-constitutional
  
3. **Direct** the Respondents to consider the appellant for promotion to the post of "SST" keeping in view his more than 23 years of service on the post of "CT" since inception of his service.
  
4. Any **other** relief may also be awarded in favor of the appellant against the Respondents

  
Appellant

Through



**(Mian Muhammad Imran)**  
Advocate High Court



**(Muhammad Uzairullah Jan)**  
Advocate High Court

Appoint order

5

DIRECTORATE OF EDUCATION (PATA), N.W.F.P PESHAWAR.

ADJUSTMENT/APPOINTMENT.

Consequent upon the approval of the Departmental Selection Committee the following CT trained candidates are temporarily appointed/adjusted on Rs. 1605/- PM in BPS-9 and Rs. 2055/- PM BPS-14 for those who are BA/B.Sc in 2nd Division or on their own pay and RPS in case of serving personal which ever is more beneficial to them plus usual allowances as admissible under the rules w.e. from the dates of their over charge in the schools noted against their names:-

<u>S/No.</u>	<u>Name/Father name</u>	<u>Posted at</u>	<u>Remarks.</u>
1).	Mr. Bacha Khan BA S/O Sardar Khan	GMS Qalagai (Mohmand Agy:)	Against a vacant CT post vice Abdul Wadood promoted to GPT post.
2).	Mr. Mujahid Khan BA S/O Rehmat Khan	GMS Navi Killi Gandhab (Mohmand)	Against a vacant SV post vice Mojeeb, Ali SV transferred.
3).	Khan Jan BA S/O Mir Alam Khan PTC GMS Khadi Khel (Mohmand Agency).	GMS Qalagai (Mohmand Agy:)	Against a vacant SV post vice Abdul Jalil SV, <del>xxxxxx</del> provided on long leave.
4).	Mr. Gul Rehman S/O Khan khel	GHS Janakor (FR. Peshawar).	Vice Muzaffar Khan did not join the post.
5).	Mr. Muhammad Aslam BA S/O Mir Hassan.	GHS Janakor (FR. Pesh:)	Vice Mohammad Saleem did not join CT post.

NOTES:-

- Charge reports should be submitted in duplicate to all concerned
- Their appointment are being made purely on temporarily basis & are liable to termination at any time without notice & without assigning. In case they wishes to resign their post they shall have to give one month's prior notice or forfeit one month's pay in lieu thereof.
- The original qualification, Date of Birth & Domicile certificate should be checked before they are handed over charge of the post and attested copies thereof be kept on the record of school
- TA/DA etc: is not allowed, on first appointment.
- They should be sent to the Agency Civil surgeon concerned for Medical Examination the day on which they report their arrival for duty and no pay should be drawn for them unless and until they produce their Health and Age Certificates from the said Surgeon.

Attested  
*[Signature]*

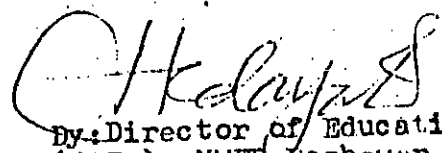
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6

ENDST: NO. 33785-87 /A-1/Merit list/CT/Dated Pesh: the 5/12/94

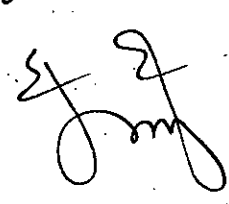
Copy forwarded for information and necessary action to the:-

- 1) Agency Education Officer (Mohmand Agency) at Ghallanai.
- 2) Headmaster GHS Junkor (FR. Peshawar) w/r to his memo: No. 1102 dated 11.12.94.
- 3) Candidates concerned.
- 4) PA to Director of Education (FATA).

  
By: Director of Education  
(FATA), NWFP Peshawar.  
*(11/12/94)*



1ruhah

Attested  


**Dist. Govt. NWFP-Provincial**  
**District Accounts Office Charsadda**  
**Monthly Salary Statement (June-2018)**

7



**Personal Information of Mr BACHA KHAN d/w/s of SARDAR KHAN**

Personnel Number: 00081229      CNIC: 1710222405289      NTN:  
 Date of Birth: 02.02.1970      Entry into Govt. Service: 21.12.1994      Length of Service: 23 Years 06 Months 011 Days

**Employment Category: Active Temporary**

Designation: CERTIFICATED TEACHER      80001105-DISTRICT GOVERNMENT KHYBE  
 DDO Code: CA6085-HEAD MASTER GOVERNMENT HIGH SCHOOL KAMAR CHARSADEA

Payroll Section: 001      GPF Section: 001      Cash Center:  
 GPF A/C No:      Interest Applied: Yes      **GPF Balance: 460,677.00**

Vendor Number: -  
**Pay and Allowances:**      Pay scale: BPS For - 2017      Pay Scale Type: Civil      BPS: 16      Pay Stage: 21

Wage type		Amount	Wage type		Amount
0001	Basic Pay	50,830.00	1000	House Rent Allowance	1,818.00
1947	Medical Allow 15% (16-22)	1,876.00	2148	15% Adhoc Relief All-2013	1,160.00
2199	Adhoc Relief Allow @ 10%	814.00	2211	Adhoc Relief All 2016 10%	4,148.00
2224	Adhoc Relief All 2017 10%	5,083.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3016	GPF Subscription - Rs3340	-3,340.00	3501	Benevolent Fund	-800.00
3609	Income Tax	-1,009.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-1,089.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	300,000.00	-8,333.00	258,335.00

**Deductions - Income Tax**

Payable: 22,046.70      Recovered till June-2018: 13,229.00      Exempted: 8817.70      Recoverable: 0.00

**Gross Pay (Rs.): 65,729.00      Deductions: (Rs.): -14,721.00      Net Pay: (Rs.): 51,008.00**

Payee Name: BACHA KHAN  
 Account Number: 02170019576401  
 Bank Details: HABIB BANK LIMITED, 220217 TEHSIL BAZAR, CHARSADEA. TEHSIL BAZAR, CHARSADEA., CHARSADEA

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address:      City: PESHAWAR      Domicile: NW - Khyber Pakhtunkhwa      Housing Status: No Official  
 Temp. Address:      City:      Email: bacha02021970@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SERVICES/27.06.2018/16:17:36/v1.1)  
 \* All amounts are in Pak Rupees  
 \* Errors & omissions excepted

Attested

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

8

# University of Peshawar (Pakistan)

Session ANNUAL 1996

BACHA KHAN

Son / Daughter of

SARDAR KHAN

and a student of the

DISTRICT CHARSADDA

who had passed the prescribed examination in OCTOBER 17, 1996 under Roll No. 15528

and was admitted by the University of Peshawar to the Degree of

**Master of** ARTS IN POLITICAL SCIENCE

in the THIRD Division

was permitted to appear in the same examination for

**Improvement of Division**

He/She re-appeared in APRIL, 1997 and obtained SECOND Division.

Serial No. 000265

Registered No. 88-1-12518

Roll No. 14856

Result declared on SEPTEMBER 20, 1997



Attested  
J. J.

Registrar

Countersigned

Vice-Chancellor



9

Serial No. 476

# CITY UNIVERSITY

of Science and Information Technology, Peshawar



*The Board of Governors*

*on recommendation of the Faculty hereby confers upon*

**BACHA KHAN** son of **SARDAR KHAN**

*the Degree of*

**Master of Education**

Session: 2005

*together with all Honours, Rights and Privileges pertaining to the degree.*

*Given under the seal of City University at Peshawar, Pakistan*

*on this Thirtieth day of November in the year Two Thousand and Six.*

President

Attested

Vice Chancellor

Head Master  
Govt. High School  
Soor Kamar

Registrar





CITY UNIVERSITY

of Science and Information Technology

M.Ed

10

Accredited By



British Accreditation Council

S.#. 139

# Provisional Certificate

Session: 2005

Certified that Mr./Ms. BACHA KHAN

S/D of SARDAR KHAN

has passed M.Ed Examination held in March 2006.

by securing CGPA 2.39 out of 4.00.

Registration No. CUP-05SG-0214-0885.

Issued date: Saturday, March 25, 2006.

Verified by \_\_\_\_\_

**Controller of Examinations**

G.T Road, Nishterabad, Peshawar City. Tel: 091-2567923-6 Fax: +92-91-2567927 www.cityuniversity.edu.pk

City University of Science and Information Technology, Peshawar, is Chartered by Govt. of N.W.F.P. Recognized by Higher Education Commission (HEC) and Accredited by the British Accreditation Council, UK.

Attested



# CITY UNIVERSITY

of Science and Information Technology  
Peshawar - Pakistan

3293

11

## Transcript

Registration No. CUP-05SG-0214-0885

Name: BACHA KHAN

Program: 0214 - M.Ed

Parentage: SARDAR KHAN

Date of Birth: 02-February-1970

Issue Date: Friday, 17 March, 2006

Course Code	Title	Credit Hours	Grade	GP
<b>2005 Spring</b>				
CSC-204	Computer Education-II	2	B	3.00
EDU-501	Curriculum Development	3	C	2.00
EDU-504	Educational Psychology	3	C+	2.50
EDU-509	Functional English - III	2	C+	2.50
<b>2005 Summer</b>				
EDU-411	Teaching of English	2	D	1.50
EDU-505	Measurement & Evaluation	3	D	1.50
EDU-506	Research Techniques	3	D	1.50
EDU-510	Functional English - IV	2	C	2.00
<b>2005 Fall</b>				
EDU-502	Philosophy of Education	3	B	3.00
EDU-503(2)	Educational Management & Supervision	2	B	3.00
EDU-512	Teacher Education in Pakistan	3	C+	2.50
EDU-513	Education in Pakistan: Problems, Trends & Issues	3	A	3.67
<b>Total Credit Hours</b>		<b>31</b>		

Commulative Grade Point Average

2.39

% Marks	Letter grade	GPA
92-100	A+	4.00
86-91	A	3.67
79-85	B+	3.33
70-78	B	3.00
63-69	C+	2.50
56-62	C	2.00
50-55	D	1.50
	EX	Exempt
Below 50%	F	Fail
	I	InComplete
	W	Withdrawl

Controller of Examinations

Attested



11A

# DOMICILE CERTIFICATE

I declare that I Was born of parents who are permanently domiciled in N. W. F. P. having been born in this province

I was born at Village/Mohallah Hazi-chand  
Tehsil Tangi District Charsadda

B. Khan  
Signature of Applicant

Pursuance of the declaration dated .....  
filled by Mr/Miss Bacha Khan son/daughter of Sardar Khan  
of Village Hazi-chand Mohallah .....  
domiciled in N. W. F. P. -It is hereby certified that the said .....  
Parents are Permanent residents of the N. W. F. P. having been born within it.

I have satisfied myself from personal/my own knowledge verification that the above declaration is true and certify accordingly.

Given under my hand and the seal of the Court

this 24th day of August 19 91

M. A. Khan  
Countersigned by  
Deputy Commissioner

Magistrate 1st Class  
[Signature]

Accepted  
[Signature]

OFFICE ORDER

Consequent upon the approval by the competent authority and to Service placed at the disposal of this office by the Director (S&L) NWFP Peshawar vide his order no: 546-707 dt: 3.12.2003 the following teachers are hereby transferred/adjusted on their own pay bills. The schools noted against their each name in the interest of public service w.e.f. from 1.9.2003.

S.No.	Name / School / Desig.	To	Remarks.
1.	Bacha Khar C.T. GMS Qalagai Mohmand Agency.	G.H.S. Sarband Peshawar.	Against Vacant Post.
2.	Niaz Gul Shah C.T. GMS Jaranalagai TR Peshawar.	G.H.S.S. Adozai Peshawar.	do
3.	Bacha Khar C.T. GMS Begrand Mohmand Agency.	G.H.S. Karyana Peshawar.	Against Newly Created post.
4.	Fida Mohammad D.M. GMS Jabba Jaranalagai Agency.	G.H.S. Sherikra Peshawar.	Against Vacant Post.
5.	Saeed-Ur-Rahman T.P. GMS Ingharal Orak Zai Agency.	GHS. Ghara Chaudan Bal Peshawar.	do

Notes:-

1. No TA/DA etc; is allowed.
2. Charge report should be submitted to all concerned.
3. The Principal/Headmasters concerned directed to not submit their Pay Bill to the D.A.O Peshawar till the verification of his documents etc;.

(AYAZ KHAN)  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY PESHAWAR.

Dated: 27/2-03 Peshawar dt: 28/3/2003.

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

1. Director Schools & Literacy NWFP Peshawar.
2. Director (S&L) NWFP.
3. Section Officer (Schools & Literacy) Department NWFP Peshawar.
4. District Account Officer Peshawar.
5. All Agency Education Officer concerned.
6. All the District Accounts Officer concerned.
7. Principal/Headmasters GHS/GMS concerned.
8. Cashier local Office.
9. C.O. to Executive District Officer (S&L) Peshawar.
10. Officials concerned.

*(Signature)*  
District Officer (Halo)  
Schools & Literacy Peshawar.

*Accepted*  
*(Signature)*

13

OFFICE OF THE DIRECTOR OF EDUCATION (FATA) N.W.F.P. PESHAWAR

Serial: No. 20720-39 AE-II

Dated Peshawar the 14-10-2003

Copy of the above is forwarded for information to:-

- 1- All the Agency Education Officers concerned, *Mohamud Hy*

*Mohamud Hy*  
 14/10/03

By: Director of Education,  
 FATA, N.W.F.P., Peshawar.

*MH*  
 14/10/03

Handwritten calculations and notes:

14  
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17  $\sqrt{240}$   
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14

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDUCATION PESHAWAR

OFFICE ORDER:-

Consequent upon the approval of the competent authority, the following Teachers are hereby transferred on their own pay & BPS in the schools noted against each name in the interest of public service with immediate effect.

S#	Name	Designation	From	To	Remarks
01	Mr. Ashfaq Ali Shah	CT	GMS Suleman Khel Peshawar	GCMHS Peshawar City	A. Vacant Pos.
02	Mr. Bacha Khan	CT	GHS Serband Peshawar	GHSS 101 Peshawar Cantt	A. Vacant Post
03	Mr. Falik Sher	CT	GHS Masho Khel	GMS Suleman Khel Peshawar	Vice S# 1

Note:-

1. TA/DA is not allowed.
2. Charge report should be submitted to all concerned.

EXECUTIVE DISTRICT OFFICER  
(E & S) EDUCATION PESHAWAR

Endst: No. 7067-69 / Dated Peshawar the 12-15 /2011.

Copy of the above is forwarded to the:-

1. District Accounts Officer Peshawar.
- 2-4 Principal / HeadMaster concerned.
3. Cashier DO (male) Local Office.
- 6-8 Officials concerned.

*Q. Khan*  
DISTRICT OFFICER (MALE)  
(E & S) EDUCATION PESHAWAR

*Attended*  
*[Signature]*

15

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR.**

**OFFICE ORDER:-**

Consequent upon the approval given by the competent authority in relaxation of ban, Mr. Bacha Khan CT BPS-15 GHSS, No. 1 Peshawar cantt: is hereby transferred against the vacant post of CT GHS, Zahid Abad District Charsadda in his own pay & BPS in the interest of public service with effect from the date of his taking over charge.

**Note:-**

1. Charge reports should be submitted to all concerned.
2. No TA/DA etc is allowed.
3. The EDOs ( E&SE ) concerned are directed to check his original service documents before, making payment of salary.
4. His seniority will be determined at the bottom of S/List under the rules.

DIRECTOR  
ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHAWA, PESHAWAR.

Endst: No. 393-98 /F.No.644/A-15/CT/AT/ Dated Peshawar the 7/2/2012  
Peshawar/Posting/Transfers.

Copy of the above is forwarded for information & n/a to the:-

1. Executive District Officers ( E&SE ) Charsadda & Peshawar.
2. District Accounts Officers Charsadda & Peshawar.
3. Headmasters concerned.
4. Teacher Concerned.
5. P.A to the Director E&SE Khyber Pakhtunkhwa Peshawar
6. M.File.

HEADMASTER  
GHS Zahid Abad  
Charsadda.

Deputy Director (Establishment)  
Elementary & Secondary Education,  
Khyber Pakhtunkhawa, Peshawar

*[Handwritten signature]*

15A

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSAKDA

OFFICE ORDER:

Transfer orders of the following CTs is hereby ordered on their own pay and scale in the interest of public service with immediate effect.

S.No	Name/Desgi:	From	To	Remarks
01	Bacha Khan CT	GHS Zahid Abad	GHS Soor Kamar	A.V.P
02	Muhammad Asjad CT	GMS Dagi Ghulam Qadar	GHS Cheena	Vice S.No 01

Note: No TA, DA is allowed  
Charge report should be submitted to all concerned

(SIBAJ MUHAMMAD)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA

Endstt: No 19430-54 / Date 15/11 /2014  
Copy for information to the:

- 1 District Account Officer, Charsakda.
- 2 Deputy District Education Officer (M) Local office
- 3 Principal/Head Masters concerned.
- 4 Official concerned.
- 5 Master File.

*[Signature]*  
15/11/14  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA

*Attested*

*[Signature]*



تنظیم اسانڈہ (پاکستان) صوبہ خیبر پختونخوا -

غیر اللہ حواری نگران شعبہ پیوڈ صوبہ خیبر پختونخوا -

سرحد شاہ باجا صدر آل پیچرز کوارڈی نیشن کونسل صوبہ KPK  
JUDGMENT SHEET

PESHAWAR HIGH COURT, PESHAWAR  
(JUDICIAL DEPARTMENT)

سندھان صدر ضلع پشاور

شاہد محمود گوہر -

Writ Petition No.2905 of 2009.

ATTA ULLAH AND OTHERS.....PETITIONERS.

VERSUS.

THE CHIEF SECRETARY KPK ETC....RESPONDENTS..

JUDGMENT.

Date of hearing 06-01-2015.

Appellant/Petitioner by Ghulam Nabi Khan Advocate

Respondent by Sardar Ali Raza Advocate - & Waqar Ahmad Seth A.A.

WAQAR AHMAD SETH, J.:- Through this single

judgment we propose to dispose of the instant Writ Petition

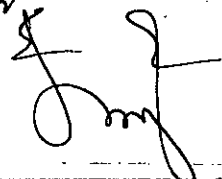
No.2905 OF 2009 as well as the connected Writ Petition

Nos.2941, 2967,2968,3016, 3025,3053,3169,3251,3292 of

2009,496,556,664,1256,1662,1685,1696,2176,2230,2501,25

96,2798 of 2010 & 206, 355,435 & 577 of 2011 as common

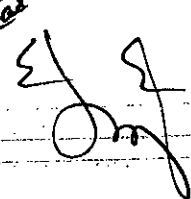
question of law and fact is involved in all these petitions.

Assesed  


2- The petitioners in all the writ petitions have approached this Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 with the following relief:-

"It is, therefore, prayed that on acceptance of the Amended Writ Petition the above noted Act No.XVI 2009 namely 'The North West Province Employees (Regularization of Services) Act, 2009 dated 24<sup>th</sup> October, 2009' being illegal, unlawful, without authority and jurisdiction, based on malafide intentions and being unconstitutional as well as ultra vires to the basic rights as mentioned in the constitution be set-aside and the respondents be directed to fill up the above noted posts after going through the legal and lawful and the normal procedure as prescribed under the prevailing laws instead of using the short cuts for obliging their own person.

It is further prayed that the notification No.A-14/SET(M) dated 11.12.2009 and Notification No.A-17/SET(5) Contract-Apptt:2009 dated 11.12.2009, as well as Notification No.SO(G)ES/1/85/2009/SS(Contract) dated

Amended  


31.05.2010 issued as a result of above noted impugned Act whereby all the private respondents have been regularized may also be set-aside in the light of the above submissions, being illegal, unlawful, unconstitutional and against the fundamental rights of the petitioners.

Any other relief deemed fit and proper in the circumstances and has not been particular asked for in the noted Writ Petition may also be very graciously granted to the petitioners".

3- It is averred in the petition that the petitioners are serving in the Education Department of KPK working posted as PST, CT, DM, PET, AT, TT, Qari and SET in different Schools; that respondents No.9 to 1359 were appointed on adhoc/contract basis on different times and later on their service were regularised through the North West Frontier Province Employees (Regularization of Services) Act, 2009; that almost all the petitioners have got the required qualifications and also got at their credit the length of service; that as per notification No.SO(S)6-2/97 dated 03/06/1995

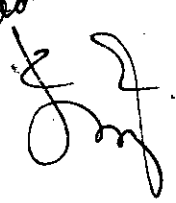
Attested



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the qualification for appointment/promotion of the SET Teachers BPS-16 was prescribed that 75% SETs shall be selected through Departmental Selection Committee on the basis of batchwise/yearwise open merit from amongst the candidates having the prescribed qualification and remaining 25% by initial recruitment through Public Service Commission whereas through the same notification the qualification for the appointment/promotion of the Subject Specialist Teachers BPS-17 was prescribed that 50% shall be selected by promotion on the basis of seniority cum fitness amongst the SETs possessing the qualification prescribed for initial recruitment having five years service and remaining 50 by initial recruitment through the Public Service Commission and the above procedure was adopted by the Education Department till 22/09/2002 and the appointments on the above noted posts were made in the light of the above notification. It was further averred that the Ordinance No. XXVII of 2002 notified on 09/08/2002 was promulgated under the shadow of which some 1681 posts of different

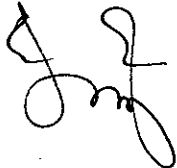
cadres were advertised by the Public Service Commission.

21-  
 P. S. S. S.  


That before the promulgation of Act No.XVI of 2009, it was practice of the Education Department that instead of promoting the eligible and competent persons amongst the teachers community, they have been advertising the above noted posts of SET (BPS-16) and Subject Specialist (BPS-17) on the basis of open merit/adhoc/contract wherein it was clearly mentioned that the said posts will be temporary and will continue only for a tenure of six months or till the appointment by the Public Serviced Commission or Departmental Selection Committee That after passing the KPK Act No.XVI of 2009 by the Provincial Assembly the fresh appointees of six months and one year on the adhoc and contract basis including respondents no.9 to 1351 with a clear affidavit for not adopting any legal course to make their services regularized, have been made permanent and regular employees whereas the employees and teaching staff of the Education Department having at their credit a service of minimum 15 to maximum 30 years have been ignored. That as per contract Policy issued on 26/10/2002


the Education Department was not authorised/entitled to

27-  
Attached



make appointments in BPS-16 and above on the contract basis as the only appointing authority under the rules was Public Service Commission. That after the publication made by the Public Service Commission thousands of teachers eligible for the above said posts have already applied but they are still waiting for their calls and that through the above Act thousands of the adhoc teachers have been regularized which has been adversely effected the rights of the petitioners, thus having no efficacious and adequate remedy available to the petitioners, they have knocked the door of this Court through the aforesaid constitutional petitions.

4- The concerned official respondents have furnished parawise comments wherein they raised certain legal and factual objections including the question of maintainability of the writ petitions. It was further stated that Rule 3(2) of the N.W.F.P. Civil Servants (Appointment, Promotion & Transfer) Rules 1989, authorised a department to lay down method of appointment, qualification and other conditions applicable to post in consultation with Establishment & Administration Department and the Finance Department.

Accepted  


That to improve/uplist the standard of education, the Government replaced/amended the old procedure i.e. 100% including SETs through Public Service Commission KPK for recruitment of SETs B-16 vide Notification No.SO(PE)+5/SS-RC/Vol-III dated 18/01/2011 wherein 50% SSTs (SET) shall be selected by promotion on the basis of seniority cum fitness in the following manner:-

"(i) - Forty percent from CT (Gen), CT(Agt), CT(Indust: Art) with at least 5 years service as such and having the qualification mentioned in column 3.

(ii) Four percent from amongst the DM with at least 5 years service as such and having qualification in column 3.

(iii) Four percent from amongst the PET with at least 5 years service as such and having qualification mentioned in column 3.

(iv) One percent amongst Instructional Material Specialists with at least 5 years

AM/ED



service and having qualification mentioned  
in column 3."

It is further stated in the comments that due to the degradation/fall of quality education the Government abandoned the previous recruitment policy of promotion/appointment/recruitment and in order to improve the standard of teaching cadre in Elementary & Secondary Education Department of KPK, vide Notification dated 09/04/2004 wherein at serial No. 1.5 in column 5 the appointment of SS prescribed as by the initial recruitment and that the (North West Frontier Provincial) Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 (ACT No. XVI of 2009 dated 24<sup>th</sup> October, 2009 is legal, lawful and in accordance with the Constitution of Pakistan which was issued by the competent authority and jurisdiction, therefore, all the writ petitions are liable to be dismissed.


5- We have heard the learned counsel for the parties and have gone through the record as well as the law on the subject.

*Amir*  
*J. J.*



6- The grievance of the petitioners is two fold in respect of Khyber Pakhtunkhwa, Employees (Regularization of Services) Act, 2009 firstly, they are alleging that regular post in different cadres were advertised through Public Service Commission in which petitioners were competing with high profile carrier but due to promulgation of Act *ibid*, they could not made through it as no further proceedings were conducted against the advertised post and secondly, they are agitating the legitimate expectancy regarding their promotion, which has been blocked due to the in block induction / regularization in a huge number, courtesy Act, No. XVI of 2009.

7- As for us, the first contention of advertisement and in block regularization of employees is concerned in this respect it is an admitted fact that the Government has the right and prerogative to withdraw some posts, already advertised, at any stage from Public Service Commission and secondly no one knows that who could be selected in open merit case, however, the right of competition is reserved. In the instant case KPK, employees

Attor  


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(Regularization of Services) Act, 2009, was promulgated, which in-fact was not the first in the line rather N.W.F.P (now Khyber Pakhtunkhwa) Civil Servants (Regularization of Services) Act, 1988, NWFP (now Khyber Pakhtunkhwa) (Regulation of Services) Act, 1989 & NWFP (now Khyber Pakhtunkhwa) Adhoc Civil Servants (Regularization of Services) Act, 1987 were also promulgated and were never challenged by anyone.


8- In order to comment upon the Act, *ibid*, it is important to go through the relevant provision which reads as under:-

S.2 Definition: (1)---

a)---

aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment.

b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge

Accepted  



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basis or who are paid out of contingencies;  
----- whereas,

S. 3 reads:-

Regularization of services of certain employees.----- All employees including recommendee of the High Court appointed on contract or adhoc basis and holding that post on 31<sup>st</sup> December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post;

9- The plain reading of above sections of the Act, *ibid*, would show that the Provincial Government, has regularized the "duly qualified persons", who were appointed on contract basis under the Contract Policy, and the said Contract Policy was never ever challenged by any one and the same remained in practice till the commencement of the said Act. Petitioners in their writ petitions have not quoted any single incident / preccedent showing that the regularized employees under the said Act, were not qualified for the post against

Att. Gen.  


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which they are regularized, nor had placed on record any documents showing that at the time of their appointment on contract they had made any objection. Even otherwise, the superior courts have time and again reinstated employees whose appointments were declared irregular by the Government Authorities, because authorities being responsible for making irregular appointments on purely temporary and contract basis, could not subsequently turned found and terminate services because of no lack of qualification but on manner of selection and the benefit of the lapses committed on part of authorities could not be given to the employees. In the instant case, as well, at the time of appointment no one objected to, rather the authorities committed lapses, while appointing the private respondent's and others, hence at this belated stage in view of number of judgments, Act, No. XVI of 2009 was promulgated. Interestingly this Act, is not applicable to the education department only, rather all the employees of the Provincial Government, recruited on contract basis till 31<sup>st</sup> December 2008 or till the commencement of this Act have been

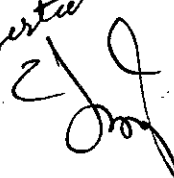
Accepted  


28

regularized and those employees of to other departments who have been regularized are not party to this writ petition.

10- All the employees have been regularized under the Act, *ibid* are duly qualified, eligible and competent for the post against which they were appointed on contract basis and this practice remained in operation for years. Majority of those employees getting the benefit of Act, *ibid* may have become overage, by now for the purpose of recruitment against the fresh post.

11- The law has defined such type of legislation as "beneficial and remedial". A beneficial legislation is a statute which purports to confer a benefit on individuals or a class of persons. The nature of such benefit is to be extended relief to said persons of onerous obligations under contracts. A law enacted for the purpose of correcting a defect in a prior law, or in order to provide a remedy where non previously existed. According to the definition of *Corpus Juris Secundum*, a remedial statute is designed to correct an existence law, redress an existence grievance, or introduced regularization conducive to the public goods. The challenged

Attested  


29

Act, 2009, seems to be a curative statute as for years the then Provincial Governments, appointed employees on contract basis but admittedly all those contract appointments were made after proper advertisement and on the recommendations of Departmental Selection Committees.

12- In order to appreciate the arguments regarding beneficial legislation it is important to understand the scope and meaning of beneficial, remedial and curative legislation.

Previously these words have been explained by N.S Bindra

in interpretation of statute, tenth edition in the following

manners:-

"A statute which purports to confer a benefit on individuals or a class of persons, by reliving them of onerous obligations under contracts entered into by them or which tend to protect persons against oppressive act from individuals with whom they stand in certain relations, is called a beneficial legislations....In interpreting such a statute, the principle established is that there is no room for taking a narrow view but that the court is entitled to be generous towards the persons on whom the benefit has

2-  
Annoted  
JL  
Dm

been conferred. It is the duty of the court to interpret a provision, especially a beneficial provision, liberally so as to give it a wider meaning rather than a restrictive meaning which would negate the very object of the rule. It is a well settled canon of construction that in constructing the provision of beneficent enactments, the court should adopt that construction which advances, fulfils, and furthers the object of the Act, rather than the one which would defeat the same and render the protection illusory..... Beneficial provisions call for liberal and broad interpretation so that the real purpose, underlying such enactments, is achieved and full effect is given to the principles underlying such legislation."

Remedial or curative statutes on the other hand have been explained as:-

"A remedial statute is one which remedies defect in the pre existing law, statutory or otherwise. Their purpose is to keep pace with the views of society. They serve to keep our system of jurisprudence up to date and in

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harmony with new ideas or conceptions of what constitute just and proper human conduct. Their legitimate purpose is to advance human rights and relationships. Unless they do this, they are not entitled to be known as remedial legislation nor to be liberally construed. Manifestly a construction that promotes improvements in the administration of justice and the eradication of defect in the system of jurisprudence should be favoured over one that perpetuates a wrong".

Justice Antonin Scalia of the U.S. Supreme Court in his book on Interpretation of Statute states that:

"Remedial statutes are those which are made to supply such defects, and abridge such superfluities, in the common law, as arise from either the general imperfection of all human law, from change of time and circumstances, from the mistakes and unadvised determinations of unlearned (or even learned) judges, or from any other cause whatsoever."

13- The legal proposition that emerges is that generally beneficial legislation is to be given liberal interpretation, the beneficial legislation must carry curative or remedial content

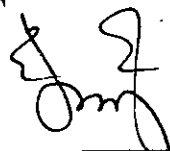
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Such legislation must therefore, either clarify an ambiguity or an omission in the existence and must therefore, the explanatory or clarificatory in nature. Since the petitioners does not have the vested rights to be appointed to any particular post, even advertised one and private respondents who have being regularized are having the requisite qualification for the post against which the were appointed, vide challenged Act, 2009, which is not effecting the vested right of anyone, hence, the same is deemed to be a beneficial, remedial and curative legislation of the Parliament.

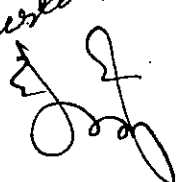
14- This court in its earlier judgment dated 26<sup>th</sup> November 2009 in WP No. 2905 of 2009, wherein the same Khyber Pakhtunkhwa (Regularization of Servers ) Act, 2009, vires were challenged has held that this court has got no jurisdiction to entertain the writ petition in view of Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, as an Act, Rule or Notification effecting the terms and conditions of service, would not be an exception to that, if seen in the light of the spirit of the ratio rendered in the case of

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I.A. Sherwani & others Versus Government of Pakistan,  
reported in 1991 SCMR 1041. Even otherwise, under Rule 3  
(2) of the Khyber Pakhtunkhwa (Civil Servants)  
(appointment), promotion and transfer) Rules 1989, authorize  
a department to lay down method of appointment,  
qualification and other conditions applicable to the post in  
consultation with Establishment & Administrative Department  
and the Finance Department. In the instant case the duly  
elected Provincial Assembly has passed the Bill/Act, which  
was presented through proper channel i.e. Law and  
Establishment Department, which cannot be quashed or  
declared illegal at this stage.

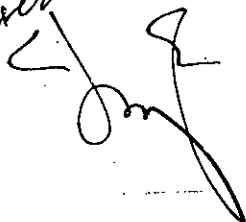
15- Now coming to the second aspect of the case, that  
petitioners legitimate expectancy in the shape of promotion  
has suffered due to the promulgation of Act, *ibid*, in this  
respect, it is a long standing principle that promotion is not a  
vested right but it is also an established principle that when  
ever any law, rules or instructions regarding promotion are  
violated then it become vested right. No doubt petitioners in  
the first instance cannot claim promotion as a vested right

Amended  


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but those who fall within the promotion zone do have the right to be considered for promotion.


16- Since the Act, XVI of 2009 has been declared a beneficial and remedial Act, for the purpose of all those employees who were appointed on contract and may have become overage and the promulgation of the Act, was necessary to give them the protection therefore, the other side of the picture could not be brushed aside simply. It is the vested right of in service employees to be considered for promotion at their own turn. Where a valid and proper rules for promotion have been framed which are not given effect, such omission on the part of Government agency amounts to failure to perform a duty by law and in such cases, High Court always has the jurisdiction to interfere. In service employees / civil servants could not claim promotion to a higher position as a matter of legal right, at the same time, it had to be kept in mind that all public powers were in the nature of a sacred trust and its functionary are required to exercise same in a fair, reasonable and transparent manner strictly in accordance with law. Any transgression from such

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principles was liable to be restrained by the superior courts in their jurisdiction under Article 199 of the Constitution. One could not overlook that even in the absence of strict legal right there was always legitimate expectancy on the part of a senior, competent and honest carrier civil servant to be promoted to a higher position or to be considered for promotion and which could only be denied for good, proper and valid reasons.

17- Indeed the petitioners can not claim their initial appointments on a higher post but they have every right to be considered for promotion in accordance with the promotion rules, in field. It is the object of the establishment of the courts and the continue existence of courts of law is to dispense and foster justice and to right the wrong ones. Purpose can never be completely achieved unless the in justice done was undone and unless the courts stepped in and refused to perpetuate what was patently unjust, unfair and unlawful. Moreover, it is the duty of public authorities as appointment is a trust in the hands of public authorities and it is their legal and moral duty to discharge their functions as

Attested  


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trustee with complete transparency as per requirement of law, so that no person who is eligible and entitle to hold such post is excluded from the purpose of selection and is not deprived of his any right.

18- Considering the above settled principles we are of the firm opinion that Act, XVI of 2009 is although beneficial and remedial legislation but its enactment has effected the in service employees who were in the promotion zone, therefore, we are convinced that to the extent of in service employees / petitioners, who fall within the promotion zone have suffered, and in order to rectify the inadvertent mistake of the respondents/Department, it is recommended that the promotion rules in field be implemented and those employees in a particular cadre to which certain quota for promotion is reserved for in service employees, the same be filled in on promotion basis. In order to remove the ambiguity and confusion in this respect an example is quoted, " If in any cadre as per existence rules, appointment is to be made on 50/50 % basis i.e 50 % initial recruitment and 50 % promotion quota then all the employees have been

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regularized under the Act in question be calculated in that cadre and equal number i.e remaining 50 % are to promoted from amongst the eligible in service employees, other wise, eligible for promotion on the basis of sonority cum fitness."


19- In view of the above, this writ petition is disposed of in the following terms:-


(i) "The Act, XVI of 2009, commonly known as (Regularization Of Services) Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.

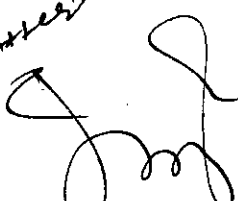
(ii) Official respondents are directed to workout the backlog of the promotion quota as per above mentioned example, within 30 days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh recruitments.

Order accordingly.

Announced.  
26<sup>th</sup> January 2015

  
JUDGE

  
JUDGE

*Announced*  


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*Announced*  
*27/1/15*

38

To

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa

Subject:

APPLICATION IN RESPECT OF PROMOTION TO THE POST OF "SST"  
AS THE UNDERSIGNED IS FIT TO BE PROMOTED KEEPING IN VIEW  
THE JUDGMENT PASSED IN WRIT PETITION NO 2905/2009 BY THE  
HONORABLE PESHAWAR HIGH COURT PESHAWAR.

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Respected Sir,

The undersigned submits as under:

- 1 That the undersigned was appointed as "CT" BPS-14 in education department in the year 1994. (Copy of appointment order is attached)
- 2 That it is pertinent to mention that the post of "CT" was upgraded from BPS-14 to BPS-15 in the year 2007 by the then government of Khyber Pakhtunkhwa.
- 3 That it is also indispensable to submit that the said post was upgraded to BPS-16 on 02/12/2015 by the then government of Khyber Pakhtunkhwa.
- 4 That it is also submitted that the government of Khyber Pakhtunkhwa appointed teachers in different cadres from 2005 to 2008.
- 5 That likewise the then provincial government was pleased to regularize all those candidates in the year 2009 through "Regularization of service act 2009".
- 6 That feeling aggrieved, some in-service teachers filed a writ petition no 2905/2009 before the Honorable Peshawar High Court Peshawar which was allowed on 26/01/2015. The operational part of the judgment is reproduced as under;

- (i) "The Act, XVI of 2009, commonly known as (Regularization Of Services) Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.
- (ii) Official respondents are directed to workout the backlog of the promotion quota as per above mentioned example, within 30 days and consider the in-service employees, till the backlog is washed out, till then there would be complete ban on fresh recruitments.

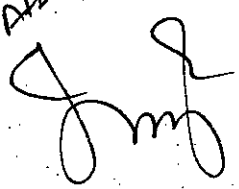
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- 7 That it is also pertinent to mention here that since appointment in 1994 till date the undersigned was not promoted even only for a single time.
- 8 That with profound veneration, the undersigned is the victim of regularization of service Act 2009.
- 9 That the rules for the transferring of employees/teachers from one district to another district (district cadre posts) and keeping them at the bottom of the seniority list is sheer violation of the fundamental rights of the undersigned keeping in view the fact that the appellants performed his duties continuously in the same department without any break thus, keeping him at the bottom of seniority list is against the equity and natural justice.
- 10 That now the undersigned is entitled to be promoted from "CT" to the post of "SST" BPS-16 keeping in view the judgments of the Honorable Peshawar high court Peshawar in writ petition no 2905/2009.

**PRAYERS:**

It is therefore most humbly prayed that on acceptance of this departmental appeal, the undersigned may kindly be promoted to the post of "SST" BPS-16 for the best administration of justice and fair-play keeping in view the judgment of the Honorable Peshawar High Court Peshawar in Writ Petition No. 2905/2009 and also natural justice and equity.

Attested  


Yours sincerely



**(Bacha Khan)**  
"CT" BPS-16  
GHS Soor kamar  
Charsadda



OFFICE OF THE DISTRICT EDUCATION OFFICER

(MALE) CHARSAKDA

40

No. \_\_\_\_\_ / DATED 26 / 11 / 2018

To

The Director,  
E&SE Khyber Pakhtunkhwa  
Peshawar.

SUBJECT:- APPLICATION IN R/O PROMOTION TO THE POST OF SST AS THE UNDERSIGNED IS FIT TO BE PROMOTED KEEPING IN VIEW THE JUDGEMENT PASSED IN THE WRIT PETITION NO. 2905/2009 BY THE HONOURABLE HIGH COURT PESHAWAR.

Memo,

I am to refer to your memo No. 151/F.No.06/SST (M) Deptt: Promotion dated 01-10-2018 on the subject cited above.

It is submitted for kind information that the applicant Mr. Bacha Khan ct bps-15 was appointed as a CT in Mohmand Agency (District Mohmand) on 21-12-1994, letter on he was transferred to District Peshawar on 01-10-2003, and transferred to District Charsadda on 29-02-2012 and his name has been included in seniority list w.e.f. 29-02-2012 as per lules and policy and stand at S.No 332.

However he will be promoted to Sr.CT BPS-16 post on his term according to the next DPC and not presently entitled for promotion to SST post please.

*sdh*  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA

Endst: No 9696-97

Copy forwarded to the:-

1. Mr. Bacha Khan CT GHS. Soor Kamar Charsadda.
2. Office file.

*Attended*  
*[Signature]*

*[Signature]*  
26/11/2018  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA



GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

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NOTIFICATION

*Peshawar, dated the November 13, 2012.*

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all 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.

Endst. No. & Date as above.

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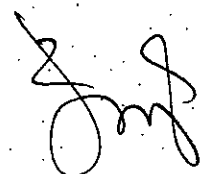
1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General,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

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8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database(EMIS) E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers in FATA.
15. All Agency Education Officers in 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. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.

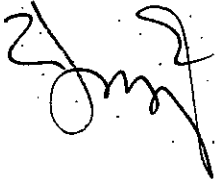
Section Officer (Primary)

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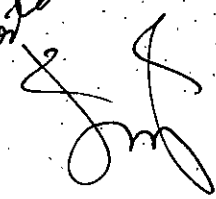
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APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	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;

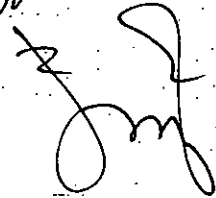
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				<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(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 at 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 Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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

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10.	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatu 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	46
11.	Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (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: <b>Note:</b> 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	

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		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		(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 years service and having qualification prescribed for initial recruitment of Certified Teacher (General).  <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
14.	Certified Teacher (Industrial Arts) (BPS-15).	(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or  (b) Bachelor's Degree from a recognized	18 to 35 years.	(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

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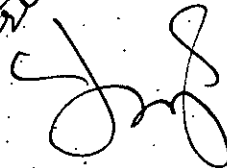


		University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion,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

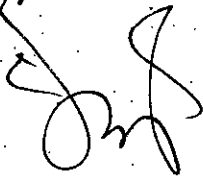
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		any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School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

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		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).		Certified Teacher (Home Economics). <b>Note:</b> In case of non availability of suitable person for promotion, then by initial recruitment.
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	(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 for initial recruitment of Drawing Master:  Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.  <b>Note:</b> In case of non-availability of suitable candidate for promotion, then by initial recruitment.

Ames Teep  



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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; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher:</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><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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*[Signature]*

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				with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.
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.	By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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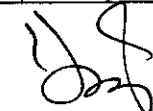
**FINAL SENIORITY LIST OF CT (MALE) DISTRICT CHARSADDA AS ON 31.12.2017**

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L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad: Qual:	Prof: Qual:	D/O/F/Apptt in Edu Deptt	Desg: 1st Apptt:	D/T/O/C Present Post	D/O Passing Prof: Exam:	D/T/O/C in this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
1	BASHIR ULLAH	FARID KHAN	CT	28-10-1959	SSC	TTC	25-11-1979	AWI	12-11-1979				12-11-1979	GHS DILDAR GHRI	
2	FAZL-E-KARIM	FAZAL JAN	Sr. CT	28-02-1962	MA	CT	01-09-1985	CT	01-09-1985	"Trained Appointed"		Nowshera	01-09-1985	GHS SHODAG	
3	NOOR AKBAR	MUHAMMAD AKBAR	Sr. CT	13-01-1961	BA	CT	09-10-1985	CT	09-10-1985	"Trained Appointed"	"No Distt: Transfer"		09-10-1985	GMS FAQIR ABAD MAJOOKI	
4	KHAISTA NOOR	SAHID NOOR	Sr. CT	01-05-1962	BA 3rd Division/ MA	CT-BEd	21-10-1986	CT	21-10-1986	"Trained Appointed"	"No Distt: Transfer"		21-10-1986	GHS MARDHAND	
5	MUHAMMAD IQBAL	ABDUL ALI	CT	27-07-1960	FA	CT	19-12-1982	AWI	11-10-1986	01-12-1986	01-02-1988	Nowshera	01-12-1986	GHS MUHAMMAD NARI	Retired on 31.08.2018
6	JAUHAR ALI	ZAIN UL ABIDIN	Sr. CT	02-02-1961	BA	CT	05-12-1985	PST	11-11-1987	"Trained Appointed"	"No Distt: Transfer"		11-11-1987	GHSS UMARZAI	
7	JAN MUHAMMAD	FIDA MUHAMMAD	Sr. CT	21-08-1958	MA	CT	05-12-1981	SV	05-12-1981	29-11-1987	30-11-1994	Peshawar	29-11-1987	GHS TANGI NO.2	Retired on 20.08.2018
8	MIR HASSAN KHAN	MUHAMMAD HASSAN	Sr. CT	13-03-1961	BA	CT	03-11-1983	SV	03-11-1983	29-11-1987	31.05.1990	Peshawar	29-11-1987	GHS ZAHID ABAD	
9	ABDUL ALI	KHAN AFZAL	Sr. CT	03-03-1963	BA	CT	28-04-1981	PST	28-12-1987	"Trained Appointed"	"No Distt: Transfer"		28-12-1987	GHS RAJJAR NO.2	
10	AWAL KHAN	AMAN KHAN	Sr. CT	14-06-1958	BA	CT	29-03-1982	CT	29-03-1982	01-08-1988	17-05-1984	Peshawar	01-08-1988	GHS AGRA	Retired w.e.f 13.06.2018
11	SHARIF ZADA	KHANZADA	Sr. CT	28-10-1961	BA	CT	05-11-1983	SV	05-11-1983	01-08-1988	16-12-1990	Nowshera	01-08-1988	GMS JAMROZ KHAN KILLI	
12	NOOR UL HALEEM	ABDUL QAYYUM	Sr. CT	15-04-1964	BA	CT	13-11-1983	SV	13-11-1983	01-08-1988	01-03-1988	Peshawar	01-08-1988	GHS UTMANZAI NO.2	
13	SAYED HASSAN SHAH	SYED SHER BADSHAH	Sr. CT	14-09-1964	MA	CT	13-11-1983	SV	13-11-1983	01-08-1988	22-12-1983	Peshawar	01-08-1988	GMS CHARSADDA NO 2	
14	DILDAR KHAN	GHULAM SAID	Sr. CT	02-04-1961	BA	CT	14-11-1979	PST	05-12-1988	"Trained Appointed"		Peshawar	05-12-1988	GHS BARI BAND	
15	NOOR MUHAMMAD	WALI MUHAMMAD	Sr. CT	17-06-1958	MA	CT	24-05-1984	SV	24-05-1984	31-01-1989	01-03-1985	Nowshera	31-01-1989	GHSS SHAKOOR	Retired w.e.f 16.06.2018
16	KHURSHED KHAN	MUHAMMAD HAMAYUN	Sr. CT	17-10-1958	BA	CT	01-01-1983	PST	23-03-1984	17-01-1990	16-10-1984	Nowshera	17-01-1990	GHSS DOSEHRA	
17	ABDUL JALIL	NOOR AHMAD	Sr. CT	05-01-1964	BA	CT	24-03-1990	CT	24-03-1990	"Trained Appointed"	"No Distt: Transfer"		24-03-1990	GHS MANDANI	
18	FAZLI MABOOD	ABDUL WADOOD	Sr. CT	01-09-1967	MA/BSC	CT	05-10-1985	CT	05-10-1985	16-04-1990	"No Distt: Transfer"		16-04-1990	GHS ZUHRAB GUL KILLI	No B.Ed
19	IRSHAD ALI KHAN	GUL QADAR	Sr. CT	08-10-1984	BA	CT	16-10-1985	CT	16-10-1985	16-04-1990	"No Distt: Transfer"		16-04-1990	GHS AMBADHER	
20	PERVEZ KHAN	AZAM KHAN	Sr. CT	20-10-1962	BA	CT	01-11-1985	CT	01-11-1985	16-04-1990	"No Distt: Transfer"		16-04-1990	GHS AMBADHER	
21	KHAN HABIB	GUL HABIB	Sr. CT	15-03-1962	MA/BA 3rd Div	CT-BEd	19-12-1985	CT	19-12-1985	16-04-1990	19-11-1990	Nowshera	16-04-1990	GHS CHARSADDA NO.1	
22	SHAMSHAD AHMAD	MISRI KHAN	Sr. CT	04-08-1959	BA	CT	24-02-1983	SV	24-02-1983	14-11-1990	16-10-1984	Nowshera	14-11-1990	GHS TANGI NO.1	
23	ABID MUHAMMAD	MUSA KHAN	Sr. CT	05-04-1964	BA	CT	11-10-1984	SV	11-10-1984	14-11-1990	"No Distt: Transfer"		14-11-1990	GHSS DOSEHRA	
24	SHER MUHAMMAD	GUL ZARIN	Sr. CT	24-12-1960	MA	CT	10-01-1985	CT	10-01-1985	14-11-1990	"No Distt: Transfer"		14-11-1990	GMS DHAKKI	
25	JAMIL UR REHMAN DURRANI	NOOR MUHAMMAD KHAN	Sr. CT	01-03-1961	MA/ BA 3rd Division	CT-BEd	25-10-1989	CT	25-10-1989	14-11-1990	12-05-1990	Nowshera	14-11-1990	GHS HAJIZAI	
26	IZHAR MUHAMMAD	GHULAM MUHAMMAD	Sr. CT	16-03-1965	MA/BA(3rd Div.)	CT-BEd	27-12-1990	CT	27-12-1990	"Trained Appointed"	"No Distt: Transfer"		27-12-1990	GHSS UMARZAI	
27	GOHAR ALI	ZAFAR ALI KHAN	Sr. CT	01-04-1964	BA	CT	10-10-1985	PET	05-10-1986	15-01-1991	"No Distt: Transfer"		15-01-1991	GHSS TARNAB	
28	NISAR MUHAMMAD	SAIF UR RAHMAN	Sr. CT	16-10-1965	MA	CT	02-12-1984	CT	02-12-1984	14-11-1990	01-02-1991	Mardan	01-02-1991	GHS HARICHAND	Retired
29	NOOR HAMID JAN	SAZ MALOOK	Sr. CT	15-07-1963	MA/ BA	CT	15-06-1987	PST	01-02-1991	"Trained Appointed"		Nowshera	01-02-1991	GHS ABAZAI	
30	GOHAR ALI	AHMAD ALI	Sr. CT	01-11-1962	BA	CT	03-12-1986	CT	03-12-1986	14-03-1991	25-09-1989	Peshawar	14-03-1991	GHS CHARSADDA NO.1	
31	MUHAMMAD IQBAL KHAN	SARIB JAN KHAN	Sr. CT	21-04-1959	BA	CT	17-10-1989	CT	17-10-1989	14-03-1991	"No Distt: Transfer"		14-03-1991	GMS GULABAD SPOLGARA	

*Handwritten signatures and initials.*

L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad. Qual:	Prof. Qual:	D/O/F/ Apptt In Edu Deptt	Desig: 1st Apptt:	D/T/O/C Present Post	D/O Passing Prof: Exam:	D/O/Q/C in this Distt if Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
32	ZAKIR HUSSAIN	SAAD ULLAH	Sr. CT	15-05-1984	BA	CT	04-09-1986	SV	14-03-1991	"Trained Appointe	"No Distt: Transfer"		14-03-1991	GHS SATTI ABAD	
33	FAROOQ AHMAD	KHALIL UR RAHMAN	Sr. CT	15-11-1980	MA	CT	25-04-1984	SV	25-04-1984	22-10-1991	11-04-1990	Peshawar	22-10-1991	GHSS UMARZAI	
34	NADAR KHAN	BAHADAR KHAN	Sr. CT	08-06-1961	MA	CT	24-10-1984	CT	24-10-1984	22-10-1991	15-02-1988	Mardan	22-10-1991	GHSS SHAKOOR	
35	SAMIN JAN	AMIR KHAN	Sr. CT	26-05-1964	BA	CT	01-11-1984	SV	01-11-1984	22-10-1991	23-08-1997	Peshawar	22-10-1991	GMS CHARSADDA NO 2	
36	HAMEED UR RAHMAN	MAJEED UR RAHMAN	Sr. CT	08-03-1964	MA	CT	26-03-1985	SV	26-03-1985	22-10-1991	06-10-1996	Peshawar	22-10-1991	GMS CHARSADDA NO 2	
37	JAVED ANWAR	FIDA MUHAMMAD Khan	Sr. CT	02-02-1960	MA/ BA 3rd Division	CT-BED	17-07-1988	PST	06-12-1989	22-10-1991	"No Distt: Transfer"		22-10-1991	GHS TURLANDI	Retired on 02.09.2018
38	ALAMGIR KHAN	MUMTAZ KHAN	Sr. CT	13-04-1969	MA/BSc/7B/Ch 3rd Division	CT-Bed	01-04-1992	CT	01-04-1992	22-10-1991	"No Distt: Transfer"		01-04-1992	GHS ZUHRAB GUL KILLI	
39	AMIN JAN	AZIM GUL	Sr. CT	25-08-1963	BA	CT	29-09-1981	PST	21-03-1984	02-04-1992	"No Distt: Transfer"		02-04-1992	GHS TURANGZAI	
40	ASAD ULLAH JAN	NASRULLAH JAN	Sr. CT	10-03-1984	BA	CT	13-12-1986	CT	13-12-1986	02-04-1992	14-01-1988	Peshawar	02-04-1992	GHS CHARSADDA NO.1	
41	GHULAM AKBAR	MIR AKBAR	Sr. CT	04-08-1985	BSC /M/Ph	CT	07-06-1987	SV	02-04-1992	02-04-1992	"No Distt: Transfer"		02-04-1992	GHS HARICHAND	No B.Ed
42	GUL RAHMAN	TU KHAN	Sr. CT	14-02-1964	MA	CT-Bed	14-09-1987	CT	14-09-1987	02-04-1992	"No Distt: Transfer"		02-04-1992	GHS MANDANI	Refused
43	BISMI ULLAH JAN	MUMTAZ KHAN	Sr. CT	02-04-1965	MA	CT-B-Ed	15-09-1987	CT	15-09-1987	02-04-1992	"No Distt: Transfer"		02-04-1992	GHS HALEEMZAI	
44	SIRAJ MUHAMMAD	DIN MUHAMMAD	Sr. CT	04-05-1983	BA	CT	10-02-1988	CT	10-02-1988	02-04-1992	"No Distt: Transfer"		02-04-1992	GMS TANGI	
45	NASEER MUHAMMAD	MUHAMMAD AKBAR	Sr. CT	02-11-1984	MA/BA(3rd Div.)	CT-BEd	28-03-1988	CT	28-03-1988	02-04-1992	"No Distt: Transfer"		02-04-1992	GHS MERA GUL ABAD	
46	MUHAMMAD FAYAZ	ASLAM KHAN	Sr. CT	16-04-1983	BA	CT	07-04-1988	SV	07-04-1988	02-04-1992	"No Distt: Transfer"		02-04-1992	GHS RAJJAR NO.1	
47	RAHMAN ULLAH	MUHAMMAD ALAM	Sr. CT	21-02-1961	MSc/BSc/Bio/Ch e	CT	20-01-1990	CT	20-01-1990	22-11-1992	03-05-2000	Nowshera	22-11-1992	GHS SHAKARDHAND	
48	NOOR GHANI	MUHAMMAD GUL	Sr. CT	01-10-1969	BAMA(ISL)	CT	22-09-1990	CT	22-09-1990	"Trained Appointed"	22-02-1993	Mohmand Agy.	22-02-1993	GHSS SHAKOOR	
49	GUL BAD SHAH	MIAN UMAR SAID	Sr. CT	01-01-1958	MA	CT-BEd	27-10-1983	CT	27-10-1983	29-11-1987	07-03-1993	Mohmand Agy.	07-03-1993	GHS MANDANI	Refused
50	MUHAMMAD YOUNAS	MUHAMMAD YOUSAF	Sr. CT	01-09-1965	MSc(Agr)	CT	22-10-1991	PST	08-03-1993	"Trained Appointed"	"No Distt: Transfer"		08-03-1993	GMS STATION KILLI TANGI	
51	ASFANDYAR KHAN	JAMIL ULLAH	Sr. CT	05-05-1962	MA/BA(3rd Div.)	CT-BEd	10-03-1993	CT	10-03-1993	"Trained Appointed"	01-12-1994	Nowshera	10-03-1993	GHS MERA GUL ABAD	
52	FAZLI MABOOD	MUHAMMAD ALAM	Sr. CT	12-10-1962	BA( 3rd Div.)	CT-BEd	01-03-1987	SV	01-03-1987	07-04-1993	"No Distt: Transfer"		07-04-1993	GHS KHARAKI	
53	BUKHARI SHAH	MUZAMMIL	Sr. CT	28-08-1960	MA	CT	04-11-1987	CT	04-11-1987	07-04-1993	"No Distt: Transfer"		07-04-1993	GHSS TARNAB	
54	MUHAMMAD YOUNAS	AJAB NOOR	Sr. CT	12-08-1958	BA( 3rd Div.)	CT	26-05-1984	SV	26-05-1984	21-10-1991	05-05-1993	Malakand Agy.	05-05-1993	GHS MARDHAND	Retired 11.08.2018
55	MUHAMMAD WAKEEL	LALI JAN	Sr. CT	02-01-1983	BA	CT	28-12-1983	SV	28-12-1983	17-01-1990	01-12-1993	Mohmand Agy.	01-12-1993	GHS GANDHERI	
56	HAKIM KHAN	TAJ MUHAMMAD	Sr. CT	14-02-1959	MA/BA	CT-B.Ed	03-10-1984	SV	03-10-1984	30-11-1988	01-12-1993	Khyber Agy.	01-12-1993	GHS GHAZGI	
57	MUHAMMAD YOUSAF	RAHMAN SAID	CT	11-04-1988	FA	CT	06-12-1989	AWI	06-12-1989	25-12-1993	06-06-1986	Nowshera	25-12-1993	GHS AMBADHER	
58	LATIF KHAN	RAFFAT ULLAH	Sr. CT	01-06-1965	MA	CT	11-12-1989	CT	11-12-1989	25-12-1993	"No Distt: Transfer"		25-12-1993	GHS ABAZAI	
59	NAZIR MUHAMMAD	MIR MUHAMMAD	Sr. CT	03-12-1985	MA/BA	CT/B.Ed	11-12-1988	PST	22-01-1990	25-12-1993	"No Distt: Transfer"		25-12-1993	GHSS UTMANZAI	B.Ed from Al Khair
60	INAM JAN	MISAL KHAN	Sr. CT	03-12-1980	MA	CT	22-11-1990	CT	22-11-1990	25-12-1993	14-09-2000	Nowshera	25-12-1993	GHS RAJJAR NO.2	
61	AHMAD YAR	HABIB UR RAHMAN	Sr. CT	09-04-1968	MSc/BA	CT/B.Ed	25-08-1989	SV	25-08-1989	29-05-1994	"No Distt: Transfer"		29-05-1994	GHS TANGI NO.1	
62	AHMAD ULLAH	HABIB UR RAHMAN	Sr. CT	14-04-1989	BSc	CT	23-10-1989	CT	23-10-1989	29-05-1994	"No Distt: Transfer"		29-05-1994	GHS TANGI NO.1	Retired on 31.10.2018
63	MUHAMMAD USMAN	FAZAL MAHMOOD	Sr. CT	07-06-1964	BA	CT	25-04-1990	SV	25-04-1990	29-05-1994	"No Distt: Transfer"		29-05-1994	GHS TANGI NO.1	

Attended  


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L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad. Qual:	Prof. Qual:	D/O/F/ Apptt in Edu Dept	Desg: 1st Apptt:	D/T/O/C Present Post	D/O Passing Prof: Exam:	D/T/O/C In this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
64	NASIR KHAN	SHAHJEHAN	Sr. CT	20-02-1967	BA	CT	05-05-1990	SV	05-05-1990	29-05-1994	"No Distt: Transfer"		29-05-1994	GHS TANGI NO.1	(55)
65	FARMAN ULLAH JAN	MIAN SAYED ALI SHAH	Sr. CT	12-02-1962	MA/BSc./Bio/Ch 3rd Division	CT-BEd	14-05-1990	CT	14-05-1990	29-05-1994	01-01-1991	Peshawar	29-05-1994	GHS GARHI HAMID GUL	
66	WISAL MUHAMMAD	GHULAM MUHAMMAD	Sr. CT	02-04-1965	BA	CT	17-10-1989	PET	14-05-1990	29-05-1994	31-05-1990	Nowshera	29-05-1994	GHS TANGI NO.1	
67	AKHTAR JAVID	DILA RAM KHAN	Sr. CT	10-03-1969	MA	CT-MEd	13-11-1990	CT	13-11-1990	29-05-1994	"No Distt: Transfer"		29-05-1994	GHS SHABOADAR	
68	IKRAM ULLAH	TAHSEEN ULLAH	Sr. CT	01-02-1968	BA	CT	19-11-1994	AWI	19-11-1994	"Trained Appointed"	"No Distt: Transfer"		18-11-1994	GHS BABARA	
69	MUHAMMAD TAHIR	FAZLI SUBHAN	Sr. CT	06-02-1969	MA	CT-BED	11-12-1988	PST	20-11-1994	"Trained Appointed"	18-09-1996	Nowshera	20-11-1994	GHS MIRZADHER	
70	IMAD ULLAH	FASIH ULLAH	Sr. CT	16-02-1969	MA	CT-MEd	03-12-1988		21-11-1994	"Trained Appointed"	02-02-1995	Nowshera	21-11-1994	GHS MIRZAI	
71	MUHAMMAD SHOAIB	SAUDAGAR	Sr. CT	04-06-1963	MA/BA	CT-BEd	29-09-1984	PST	22-11-1994	"Trained Appointed"	"No Distt: Transfer"		22-11-1994	GHSS SHERPAO	
72	S. KHALID SHAH	SYED DILAWAR SHAH	Sr. CT	01-04-1966	MA/BA	CT-BEd	01-04-1985	PST	22-11-1994	"Trained Appointed"	"No Distt: Transfer"		22-11-1994	GHS CHARSADDA KHASS	
73	SARDAR ALI	FAZLI WAHAB	Sr. CT	03-03-1967	MA/BA	CT-BEd	19-10-1988	PST	22-11-1994	"Trained Appointed"	"No Distt: Transfer"		22-11-1994	GHS NO -2 TANGI	
74	WAJEEH UR RAHMAN	INAYAT UR RAHMAN	Sr. CT	02-02-1968	MA	CT-MEd	22-11-1994	CT	22-11-1994	"Trained Appointed"	22-07-1999	Nowshera	22-11-1994	GHSS SHERPAO	
75	MUHAMMAD HAYAT	FAQIR MUHAMMAD	Sr. CT	12-04-1968	MA/BA	CT-B.ED/MEd	13-06-1987	PST	22-11-1994	"Trained Appointed"	"No Distt: Transfer"		22-11-1994	GHS GUL ABAD TANGI	
76	KHAN ZADA	WAZIR ZADA	Sr. CT	04-01-1964	MA/BA 3rd Division	CT-BEd	23-11-1994	CT	23-11-1994	"Trained Appointed"	"No Distt: Transfer"		23-11-1994	GHSS SHERPAO	
77	MUZAFAR SHAH	GUL SHAH	Sr. CT	20-12-1966	MA/BA 3rd Division	CT-BEd	01-03-1990	PST	23-11-1994	"Trained Appointed"	20-12-1994	Nowshera	23-11-1994	GHS JAMROZ KHAN	
78	FAKHR-E-ALAM	MIRZA KHAN	Sr. CT	17-03-1969	BSc Chem, Zoology, State	CT	23-11-1994	CT	23-11-1994	"Trained Appointed"	"No Distt: Transfer"		23-11-1994	GHS HAJIZAI	
79	GUL SHAD	RAHMAT GUL	Sr. CT	17-03-1982	MA (Pa)/ BA	CT-BEd	13-12-1982	PST	24-11-1994	"Trained Appointed"	"No Distt: Transfer"		24-11-1994	GHSS SHERPAO	
80	MUHAMMAD NASIR	AZIZ-UD-DIN	Sr. CT	20-02-1966	MA (Pashto)/BA	CT-BEd	12-03-1988	PST	24-11-1994	"Trained Appointed"	"No Distt: Transfer"		24-11-1994	GHS CHARSADDA NO.1	
81	MUHAMMAD ZARIN	LAL ZARIN	Sr. CT	10-04-1966	MA (Pashto) BA	CT-BEd	01-03-1990	PST	01-12-1994	"Trained Appointed"	20-04-1996	Nowshera	01-12-1994	GHSS Sherapo	
82	MUHAMMAD IJAZ ALAM	INAYAT ULLAH KHAN	Sr. CT	11-04-1967	BA	CT	01-04-1988	PST	01-12-1994	"Trained Appointed"	"No Distt: Transfer"		01-12-1994	GHS TURANGZAI	
83	ALIF-UR-RAHMAN	RAHMAT GUL	Sr. CT	12-11-1965	MA/BSc./B/Ch 3rd Division	CT-BEd	27-11-1989	CT	27-11-1989	09-01-1995	01-07-1997	Nowshera	09-01-1995	GHS SHODAG	
84	SHAHAB AHMAD	ATTA MUHAMMAD	Sr. CT	25-05-1972	BA	CT-BEd	01-12-1994	CT	12-01-1994	09-01-1995	01-10-2008	Peshawar	09-01-1995	GHS GHAZGI	
85	GUL HUSSAIN	AFTAB UD DIN	Sr. CT	13-04-1967	BA	CT-BEd	10-01-1995	CT	10-01-1995	"Trained Appointed"	01-09-1997	Nowshera	10-01-1995	GHSS NISATTA	
86	MUHAMMAD RAHIM	ABDUL AMIN	CT	10-04-1970	BA	CT	18-01-1995	CT	18-01-1995	"Trained Appointed"	18-05-1995	Peshawar	18-01-1995	GMS MIRZAGAN CHARSADDA	
87	MUHAMMAD AYAZ	RAHMAT ULLAH	Sr. CT	09-04-1968	BA	CT	01-03-1995	CT	01-03-1995	"Trained Appointed"	"No Distt: Transfer"		01-03-1995	GHS CHARSADDA KHASS	
88	ZAFAR KHAN	AZIM KHAN	Sr. CT	01-01-1971	BA	CT-BEd	25-04-1989	PST	01-03-1995	"Trained Appointed"	"No Distt: Transfer"		01-03-1995	GHS PRANG	
89	SHAKEEL AHMAD	MIR QADAR KHAN	Sr. CT	18-02-1967	BA	CT-BEd	24-03-1992	SV	24-03-1992	09-03-1995	01-07-1993	Nowshera	09-03-1995	GHS AMBADHER	
90	FAZLI GHANI	RAHMAT SHAH	Sr. CT	15-05-1968	BBA/MBA	CT	20-10-1986	CT	20-10-1986	25-05-1995	"No Distt: Transfer"		25-05-1995	GHSS DARGAI MANGA	
91	RIFAQAT ALI	SYED RAHMAT SHAH	Sr. CT	06-09-1967	BA	CT	11-09-1989	CT	11-09-1989	25-05-1995	"No Distt: Transfer"		25-05-1995	GHS KANGRA	
92	QAISAR KHAN	BANARAS KHAN	Sr. CT	24-04-1967	MA Urdu	CT-BEd	13-11-1990	CT	13-11-1990	25-05-1995	"No Distt: Transfer"		25-05-1995	GHS MM KHEL NO.2	
93	MIAN ABDUL SATTAR	MIAN ABDUL AZIZ	Sr. CT	12-06-1964	BA	CT	18-11-1990	SV	18-11-1990	25-05-1995	"No Distt: Transfer"		25-05-1995	GHS HAJIZAI	
94	MUHAMMAD ALAM	ABDUL KHALIQ	Sr. CT	15-04-1966	BSc maths, states	CT-BEd	18-11-1990	SV	18-11-1990	25-05-1995	"No Distt: Transfer"		25-05-1995	GHS CHARSADDA KHASS	
95	SAHAR GUL	RAHMAT GUL	Sr. CT	02-04-1966	MA/BA	CT-B.ED/MEd	06-03-1990	PST	17-08-1995	"Trained Appointed"	"No Distt: Transfer"		17-08-1995	GHS KATOZAI	

*Handwritten signature/initials*



S.L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad. Qual:	Prof. Qual:	D/O/F/Apptt in Edu Deptt	Desg. 1st Apptt:	D/O/O/C Present Post	D/O Passing Prof. Exam:	D/O/O/C in this Distt if Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
96	FAZLI HADJI	MUHAMMAD PAWAN	Sr. CT	15-02-1959	MA/BA	CT-BEd	30-10-1984	QARI	01-01-1995	"Trained Appointed"	08-11-1995	SWAT	08-11-1995	GHS CHARSAKHA KHASS	
97	ALI AKBAR	HAJI AJOON KHAN	Sr. CT	03-05-1966	MA/BA	CT-BEd	08-11-1995	CT	08-11-1995	"Trained Appointed"	"No Distt: Transfer"		08-11-1995	GHS RUSTAM KHAN KILLI	
98	KHALID KHAN	SHER GUL	Sr. CT	04-02-1966	MA/BA	CT	01-03-1990	PST	09-11-1995	13-05-1997	"No Distt: Transfer"		09-11-1995	GHS ZUHRAB GUL KILLI	
99	MAAZULLAH	SHER ZADA	Sr. CT	20-11-1973	MA/BA	CT-BEd	15-11-1995	CT	15-11-1995	15-11-1995	"No Distt: Transfer"		15-11-1995	GHS ZARBAB GARHI	
100	MUHAMMAD FAROOQ	MUHAMMAD UMAR KHAN	Sr. CT	03-09-1969	MA/BA	CT-BEd	25-10-1993	PET	30-11-1995	"Trained Appointed"	15-07-1997	Nowshera	30-11-1995	GHS ZAHID ABAD	
101	FAKHR E ALAM	MUHAMMAD AKBAR	Sr. CT	10-04-1966	MA/BA	CT-B-Ed-MED	16-10-1988	PST	16-12-1995	"Trained Appointed"	"No Distt: Transfer"		16-12-1995	GHSS UMARZAI	
102	MUHAMMAD TAHIR	SAMI ULLAH KHAN	Sr. CT	05-02-1970	MSc/ BSC AGRICULTURE	CT-BEd	17-12-1995	CT	17-12-1995	"Trained Appointed"	01-07-1997	Nowshera	17-12-1995	GCMHS TURANGZAI	
103	IHSAN UL WADOOD	GHULAM ISMAIL KHAN	Sr. CT	02-01-1971	BA 3RD DIVISION	CT TEC	22-01-1996	CT	22-01-1996	"Trained Appointed"	"No Distt: Transfer"		22-01-1996	GHS ATTAKI	
104	HILAL AHMAD	MUHAMMAD ISMAIL	Sr. CT	10-04-1967	MA/BA	CT-BEd	18-10-1988	PST	11-02-1996	"Trained Appointed"	"No Distt: Transfer"		11-02-1996	GHS TURLANDI	
105	MIDRAR ULLAH JAN	MIAN NOOR UL WAHAB	Sr. CT	25-10-1968	MA/BA	CT-MEd	24-03-1996	CT	24-03-1996	"Trained Appointed"	"No Distt: Transfer"		24-03-1996	GHS CHARSAKHA NO.1	
106	NAEEM SHAH	UMAR SHAH	Sr. CT	07-04-1965	BA	CT-BEd	18-10-1988	PST	03-04-1996	"Trained Appointed"	"No Distt: Transfer"		03-04-1996	GHS MANDANI	
107	BAHRAMAND	SULTAN MUHAMMAD	Sr. CT	10-05-1971	MA/BA	CT-BEd	28-11-1990	PST	04-04-1996	"Trained Appointed"	"No Distt: Transfer"		04-04-1996	GHSS UTMANZAI	
108	SHER ALAM KHAN	KHALID KHAN	Sr. CT	16-02-1965	MA/BA	CT-BEd	01-10-1985	PST	08-04-1996	25-12-1993	"No Distt: Transfer"		08-04-1996	GHS DHERI SIKANDAR KHAN	
109	GUL YAR	BAKHTYAR	Sr. CT	28-02-1966	MA/BA	CT-BEd	10-01-1991	J/Clerk	09-04-1996	"Trained Appointed"	"No Distt: Transfer"		09-04-1996	GCMHS TURANGZAI	
110	SYED ABDULLAH SHAH	ZEWAR SHAH	Sr. CT	01-04-1973	BA	CT	09-04-1996	CT	09-04-1996	"Trained Appointed"	"No Distt: Transfer"		09-04-1996	GHS MANDANI	
111	SAJID ULLAH JAN	FAZLI GHANI	Sr. CT	01-01-1967	MA/BA	CT-BEd	15-10-1985	PST	16-04-1996	"Trained Appointed"	"No Distt: Transfer"		16-04-1996	GHS Rajjar No-1	
112	MIAN FAZLI TAWAB	MIAN KACHKOL SHAH	Sr. CT	12-08-1963	MA/BA	CT-MEd	13-10-1984	J/Clerk	24-05-1996	"Trained Appointed"	"No Distt: Transfer"		24-05-1996	GHS AGRA	
113	JAMAL SHAH	SAID IMRAN	CT	22-04-1969	FA	CT	16-10-1989	CT	26-10-1999	25-05-1996	"No Distt: Transfer"		25-05-1996	GMS QAZI SERAI	No BA
114	SYED BASHIR AHMAD SHAH	SYED RAHIM SHAH	Sr. CT	22-10-1975	MA/BA	CT-BEd	31-01-1988	SV	31-01-1996	25-05-1996	"No Distt: Transfer"		25-05-1996	GHS SHABQADAR	
115	MUHAMMAD AYAZ	JUMA GUL	CT	02-04-1972	BA	CT	09-04-1988	CT	09-04-1996	25-05-1996	28-12-2001	Peshawar	25-05-1996	GMS QAZI SERAI	Refused
116	SAIF UR RAHMAN	ZIARAT GUL	Sr. CT	15-01-1965	MA/BA	CT-BEd	21-10-1993	PET	25-05-1995	"Trained Appointed"	"No Distt: Transfer"		25-05-1996	GHSS MANDANI	
117	INAM ULLAH	MEHER ALI	Sr. CT	28-09-1973	MA/BA	CT-BEd/MED	01-06-1996	CT	01-06-1996	"Trained Appointed"	01-09-2003	Nowshera	01-06-1996	GHS GEEDAR	
118	MUHAMMAD AYAZ KHAN	INAYAT ULLAH KHAN	Sr. CT	20-11-1969	MA/BA	CT-B.ED/MED	01-10-1989	PST	01-06-1996	"Trained Appointed"	"No Distt: Transfer"		01-06-1996	GHS RAJJAR NO-1	
119	M. ZAHOR AKBAR JAN	MUHAMMAD AKBAR	Sr. CT	01-11-1959	MA/BA	CT-BEd	01-08-1990	AT	01-09-1996	"Trained Appointed"	"No Distt: Transfer"		01-09-1996	GHS Prang	
120	MUHAMMAD NAWAZ	MUHAMMAD DIN	Sr. CT	28-08-1961	MA/BA	CT-BEd	03-12-1984	QARI	01-09-1996	"Trained Appointed"	"No Distt: Transfer"		01-09-1996	GHS GARHI HAMID GUL	
121	MAQBOOL AHMAD	GHULAM NABI	Sr. CT	15-10-1966	BA	CT-BEd	01-10-1984	PST	01-09-1996	"Trained Appointed"	01-09-1996	Nowshera	01-09-1996	GHS BOOBAB	
122	DOST MUHAMMAD	MUHAMMAD SAEED	Sr. CT	10-05-1970	BSc(WPhy)	CT	25-09-1996	CT	25-09-1996	"Trained Appointed"	"No Distt: Transfer"		25-09-1996	GHS WARDAGA	No B. Ed
123	NAEEM ULLAH KHAN	SARDAR KHAN	Sr. CT	02-11-1984	MA	CT-MEd	03-10-1996	CT	03-10-1996	"Trained Appointed"	"No Distt: Transfer"		03-10-1996	GHSS TARNAB	
124	SHAMS UL HAQ	HABIB UL HAQ	Sr. CT	01-03-1969	MA	CT-BED	16-10-1996	CT	16-10-1996	"Trained Appointed"	31-07-2009	Nowshera	16-10-1996	GHS SHARA SKF	
125	QAZI BASHEER UL HAQ	QAZI AZIZ UL HAQ	Sr. CT	10-05-1971	BA	CT-BEd	26-10-1996	CT	26-10-1996	"Trained Appointed"	"No Distt: Transfer"		26-10-1996	GHS SATTI ABAD	
126	BARKAT SHAH	SALIH SHAH	Sr. CT	15-04-1974	MA	CT-MED	27-10-1996	CT	27-10-1996	"Trained Appointed"	"No Distt: Transfer"		27-10-1996	GHS CHARSAKHA NO.1	
127	FAROOQ ALI	KHISRO PARVEZ	Sr. CT	25-04-1970	MA	CT-BEd	01-11-1996	CT	01-11-1996	31-10-1996	07-08-1999	Peshawar	01-11-1996	GHS CHARSAKHA NO.1	

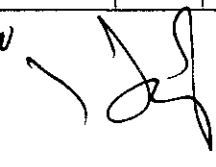
*Handwritten signature and initials*

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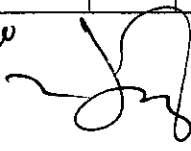
L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad: Qual:	Prof: Qual:	D/O/F/ Apptt In Edu Deptt	Desg: 1st Apptt:	D/T/O/C Present Post	D/O Passing Prof: Exam:	D/T/O/C In this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date-on Which Seniority Applied	Present School	Remarks
128	MUSLIM KHAN	SALAH UD DIN	Sr.CT	01-01-1969	MA/ BA	CT-Bed/M.Ed	15-12-1994	PET	06-11-1996	"Trained Appointed"	01-12-1998	Nowshera	06-11-1996	GHS SHAKARDHAND	
129	ASGHAR ALI	ABDUL SALAM ARIF	Sr.CT	20-03-1978	BA	Diploma	05-12-1996	AW/ CT	05-12-1996	"Trained Appointed"	01-12-1998	Nowshera	05-12-1996	GHS AGRA	
130	HASBUN ULLAH JAN	SAEED UL HAQ	Sr.CT	15-03-1963	MA	CT-BEd	09-12-1996	CT	09-12-1996	"Trained Appointed"	"No Distt: Transfer"		09-12-1996	GHS Agra	
131	MUHAMMAD IBRAHIM	ZAMIN GUL	Sr.CT	01-05-1970	MA/BA	CT/BED/M.ED	01-11-1986	SV/CT	01-11-1986	06-01-1997	01-01-2013	Nowshera	06-01-1997	GHS KHAT KILLI PRANG	
132	ASHRAF KHAN	ZARAWAR KHAN	Sr. CT	15-09-1960	BA	CT	16-09-1984	SV	16-09-1984	25-05-1996	15-01-1997	Agency	15-01-1997	GHS TANGI NO.1	
133	FIDA MUHAMMAD	SHAHZAD GUL	Sr.CT	15-04-1963	MA/BA	CT-BEd	24-12-1989	SV	24-12-1989	13-05-1997	01-02-1991	Nowshera	13-05-1997	GHS MERA GUL ABAD	Retired on 01.09.2018.
134	FAZLI ALI	FAZLI ELAHI	Sr.CT	11-01-1963	MA/BA(3rd Div.)	CT-B.Ed/MEd	01-11-1995	CT	01-11-1995	13-05-1997	"No Distt: Transfer"		13-05-1997	GHS HARICHAND	
135	SHER AFZAL	FAZLI RAZIQ	Sr.CT	12-02-1969	MA/BA	CT-Bed/M.Ed	24-03-1992	CT	24-03-1992	13-05-1997	01-09-1997	Peshawar	13-05-1997	GHS GEEDAR	
136	ZAHOOOR AHMAD	MUHAMMAD KHAN	Sr.CT	05-03-1989	MA/Bsc(M/Stat)	CT-BEd	03-12-1989	PST	27-06-1997	"Trained Appointed"	"No Distt: Transfer"		27-06-1997	GHS WARDAGA	
137	FIRDOUS KHAN	AZAD KHAN	Sr.CT	17-04-1989	MA/BA	CT-MEd	03-03-1988	PST	27-06-1997	"Trained Appointed"	"No Distt: Transfer"		27-06-1997	GHS DHERI SIKANDAR KHAN	
138	SAMI UR RAHMAN	HIDAYAT UR RAHMAN	Sr.CT	10-01-1960	MA/BA	CT-BEd	13-10-1988	PST	28-06-1997	"Trained Appointed"	01-09-1997	Peshawar	28-06-1997	GMS DAGI GHULAM QADAR	
139	GHAFFAR ALI	MUHAMMAD AKBAR KHAN	Sr.CT	05-04-1964	MA/ BA	CT-BEd	30-09-1984	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS Charsadda Khas	
140	ZAHID ULLAH	AMAN ULLAH	Sr.CT	15-01-1965	MA/ BA	CT-MEd	04-02-1990	PST	28-06-1997	"Trained Appointed"	31-08-1997	Nowshera	28-06-1997	GHS TANGI NO.1	
141	EJAZ AHMAD	NISAR AHMAD	Sr.CT	06-09-1965	MA/BA	CT-BEd	13-10-1988	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS AMBADHER	
142	MUBARAK SHAH	KHAISTA KHAN	Sr.CT	24-11-1965	MA	CT-BEd	13-10-1988	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHSS SHERPAO	
143	FAZLI MUJEEB	SAHIB ZADA	Sr.CT	28-12-1965	MA/ BA	CT-BEd	08-05-1986	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS SHODAG	
144	HABIB UL HASSAN	FAZLI RAHMAN	Sr.CT	27-04-1966	MA/ BA	CT-BEd	06-06-1992	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHSS DHAKKI	
145	UMAT KHAN	ALIF KHAN	Sr.CT	12-01-1967	MA/ BA	CT-BEd	12-09-1987	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHSS UMERZAI	
146	SYED SHABIR AHMAD	SYED MUHAMMAD RAZA	Sr.CT	01-09-1967	MA	CT-MEd	25-08-1986	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHSS CHARSADEA NO.1	
147	FAZL-E-HAYAT JAN	FAZL-E-MALIK KHAN	Sr.CT	01-12-1967	MA	CT-MEd	22-03-1990	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHSS TARNAB	
148	MUHAMMAD FAYAZ	MUHAMMAD ASLAM	Sr.CT	05-02-1969	MA	CT-BEd	01-04-1993	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHSS SHERPAO	
149	MUHAMMAD FEROZ SHAH	GUL ASLAM	Sr.CT	03-04-1969	MA/ BSC M/STATE/Add: English	CT-MEd	30-04-1992	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS TANGI NO.1	
150	SAJID ALI	SABZ ALI	Sr.CT	12-03-1970	MA	CT-BEd	02-01-1988	PST	28-06-1997	"Trained Appointed"	27-07-1999	Nowshera	28-06-1997	GHS GARHI HAMID GUL	
151	SYED SANGIN SHAH	SYED SHAH	Sr.CT	29-04-1970	MA/BA	CT-BEd	01-12-1988	QARI	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS ZARBAB GARHI	
152	ROOH ULLAH JAN	FARID GUL	Sr.CT	03-02-1971	MA	CT	01-03-1990	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS HAJI ZAI	
153	SHAHID ULLAH	HARIR ULLAH	Sr.CT	15-01-1972	MA	CT-BEd	18-03-1992	PST	28-06-1997	"Trained Appointed"	"No Distt: Transfer"		28-06-1997	GHS MIRZADHER	
154	MUSHTAQ AHMAD	MUHAMMAD FAZLI SUBHAN	Sr.CT	01-01-1966	MA	CT-MEd	10-05-1988	PST	29-06-1997	"Trained Appointed"	01-09-1997	Peshawar	29-06-1997	GHS CHEENA	
155	BADSHAH JAN	KIRMAT SHAH	Sr.CT	11-10-1986	MA/BA	CT-BEd	12-09-1987	PST	30-06-1997	"Trained Appointed"	"No Distt: Transfer"		30-06-1997	GHS DHERI SIKANDAR KHAN	
156	SAFDAR ALI	WASAL KHAN	Sr.CT	12-09-1962	MA/ BA	CT-BEd	04-12-1985	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS UTMANZAI	
157	MUHAMMAD KHAN	FAZLI KARIM	Sr.CT	03-07-1963	MA	CT	02-11-1981	AT	01-07-1997	"Trained Appointed"	11-04-1998	Peshawar	01-07-1997	GHSS CHARSADEA NO.1	
158	WALI KHAN	SAIF ULLAH	Sr.CT	03-04-1964	MA	CT	06-10-1985	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS SHAHBAZ KHAN	
159	MUHAMMAD ISHAQ	AIN UD DIN	Sr.CT	10-10-1964	MA	CT-BEd	17-09-1986	PST	01-07-1997	"Trained Appointed"	01-09-1997	Peshawar	01-07-1997	GHS M.M KHEL NO.1	

L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad: Qual:	Prof: Qual:	D/O/F/ Apptt in Edu Deptt	Desg: 1st Apptt:	D/O/F/ Present Post	D/O Passing Prof: Exam:	D/O/F/ in this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks	
160	TILA MUHAMMAD	FAZAL MUHAMMAD	Sr.CT	02-02-1965	MA/ BA	CT-BEd	17-09-1986	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS SHAKARDHAND	58	
161	RAZ MUHAMMAD	HABIB GUL	Sr.CT	13-02-1965	MA	CT	13-10-1988	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS CHARSADDA KHAS		
162	NAEEM JAN	SHAKIR ULLAH JAN	Sr.CT	01-03-1965	MA	CT-BEd	10-12-1988	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS CHARSADDA NO.1		
163	NAZ ALI KHAN	FAZLI KARIM	Sr.CT	05-03-1965	MA/ BA	CT-MEd	18-09-1986	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS HASSANZAI		
164	MUHAMMAD IRFAN	MUHAMMAD ROSHAN	Sr.CT	15-03-1965	MA	CT-BEd	07-02-1985	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS UTMANZAI		
165	ZAIN UL ABIDIN	MUHAMMAD YOUSAF	Sr.CT	29-03-1965	MA/BA	CT-BEd	17-09-1986	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS NISATTA		
166	IMRAN ALI	KHALIL UR RAHMAN	Sr.CT	18-06-1965	MA/Bsc(M/Stat)	CT-MEd	04-04-1988	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS CHARSADDA NO.1		
167	SHAMSUL HADI	FAZLI HADI	Sr.CT	30-09-1965	MA	CT-BEd	11-12-1988	PST	01-07-1997	"Trained Appointed"	23-12-1998	Nowshera	01-07-1997	GHS GUL KHITAB		
168	S.AMJAD ALI SHAH	S.MUHAMMAD ALI SHAH	Sr.CT	02-02-1966	MA	CT	21-01-1991	PST	01-07-1997	"Trained Appointed"	22-07-1999	Nowshera	01-07-1997	GHS GUL KHITAB		
169	SYED AHMAD SHAH	RAHMAN UD DIN	Sr.CT	01-03-1966	BSc(M/Phy)	CT-Bed(AIkhair)	01-07-1997	CT	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GCMHS TURANGZAI		B.Ed from Al Khair
170	SAID RASOOL	HAMAISH GUL	Sr.CT	08-03-1968	MA	CT-BEd	17-09-1986	PST	01-07-1997	"Trained Appointed"	01-09-1997	Nowshera	01-07-1997	GHSS CHARSADDA NO.1		
171	HABIB ULLAH	HAZRAT ULLAH	Sr.CT	02-04-1966	MA/BA	CT-BEd	01-10-1984	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS SHABQADAR		
172	IJAZ KHAN	WAZIR GUL	Sr.CT	03-04-1966	MA	CT-Bed/M.Ed	22-01-1991	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS SHERPAO		
173	S JAMAL SHAH	S SAJWAL SHAH	Sr.CT	25-04-1966	MA/BA	CT-BEd	28-11-1984	PST	01-07-1997	"Trained Appointed"	01-09-1997	Peshawar	01-07-1997	GHS ATTACKI		
174	KHALID SHAH	RAZIQ SHAH	Sr.CT	10-07-1966	MA/BA	CT-BEd	17-09-1986	PST	01-07-1997	"Trained Appointed"	23-07-1999	Peshawar	01-07-1997	GHS BEHLOLA		
175	ALI RAZA	GUL HAMID	Sr.CT	02-10-1966	MA/BA	CT-MEd	24-01-1991	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS IBRAHIMZAI		
176	ABDUL QAYUM	ABDUL HAY	Sr.CT	01-01-1967	MA	CT-BEd	04-02-1980	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS SOOR KAMAR		
177	AHMAD ZEB	MUHAMMAD SARWAR KHAN	Sr.CT	03-01-1967	MA	CT	01-07-1997	CT	01-07-1997	"Trained Appointed"	23-08-1999	Nowshera	01-07-1997	GHSS TARNAB		
178	ALI NAWAZ	MUMTAZ	Sr.CT	12-04-1967	MA/BA	CT-BEd	21-09-1986	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GCMHS TURANGZAI		
179	TARIQ ULLAH	TAHSEEN ULLAH	Sr.CT	03-09-1967	MA	CT-BEd	29-11-1990	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS CHARSADDA KHASS		
180	IFTIKHAR AHMAD	MIR AKBAR KHAN	Sr.CT	12-11-1967	MA/BA	CT-MEd	01-03-1993	PST	01-07-1997	"Trained Appointed"	21-11-1998	Peshawar	01-07-1997	GHS RUSTAM KHAN KILLI		
181	SALEEM JAN	SHAKIR ULLAH JAN	Sr.CT	24-12-1967	MA/ BA	CT-MEd	24-05-1988	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS CHARSADDA NO.1		
182	SAIF ULLAH JAN	ZARNOSH KHAN	Sr.CT	01-01-1968	MA/BA	CT-BEd	17-09-1986	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS IBRAHIMZAI		
183	BADRI ALAM	SHASHUL ARIFIN	Sr.CT	24-04-1988	MA/BA	CT-BEd	14-03-1990	PST	01-07-1997	"Trained Appointed"	04-05-2000	Peshawar	01-07-1997	GHS GHAZGI		
184	MUHAMMAD SIDDIQ	SHAHZAD GUL	Sr.CT	02-06-1988	MA/ BA	CT-BED-MED	03-03-1990	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS AMBADHER		
185	AMIN UL HAQ	MUHAMMAD ISHAQ	Sr.CT	02-10-1968	MA Arabic/Isl BA	CT-Bed/MED	12-03-1988	PST	01-07-1997	"Trained Appointed"	01-02-1999	Peshawar	01-07-1997	GHS ZUHRAB GUL KILLI		
186	JAVED AKHTAR	MADAT KHAN	Sr.CT	01-12-1968	MA	CT-MEd	07-12-1988	PST	01-07-1997	"Trained Appointed"	29-07-1999	Peshawar	01-07-1997	GHSS NO 1 CHARSADDA		
187	FARMAN ULLAH	SADULLAH KHAN	Sr.CT	25-12-1968	MA/ BA	CT-BEd	01-07-1997	CT	01-07-1997	"Trained Appointed"	01-08-1997	Nowshera	01-07-1997	GHSS BATTAGRAM		
188	TAQDEER ULLAH	HIZAR GULAB	Sr.CT	01-03-1969	MA/BA	CT-BEd	08-03-1988	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS MANI KHELA		
189	MUHAMMAD YOUNAS	HAJI GHAZI KHAN	CT	06-03-1969	MA	CT-BEd	24-01-1991	PST	01-07-1997	"Trained Appointed"	24-07-1999	Nowshera	01-07-1997	GMS CHANCHANO KHAT	Refused	
190	SHAH WALI	SABAZ ALI	Sr.CT	03-04-1970	MA	CT-BEd	28-11-1990	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS GARHI HAMID GUL		
191	FAIZULLAH	MUHAMMAD NAWAB	Sr.CT	12-04-1970	MA	CT-BEd	05-10-1989	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS KHAT KILLI PRANG		

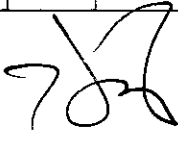
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L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad. Qual:	Prof. Qual:	D/O/F/ Apptt In Edu Deptt	Desig: 1st Apptt:	D/T/C Present Post	D/O Passing Prof. Exam:	D/T/C in this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on-Which Seniority Applied	Present School	Remarks	
192	M. WALI UR RAHMAN	SHER RAHMAN	Sr.CT	18-04-1970	MA	CT-BEd	29-11-1990	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHSS DARGAI MANGA	59	
193	JAN SHER KAMAL	FAZAL KAMAL	Sr.CT	15-03-1971	MA/BA	CT-MEd	18-03-1992	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS HAJIZAI		
194	GHAYAS UD DIN	TAHIR UD DIN	Sr.CT	01-04-1971	MA	CT-BEd	17-07-1989	J/Clerk	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS KHAT KILLI PRANG		
195	SAJID UR REHMAN	ABDUR REHMAN	Sr.CT	08-04-1971	MA/BA	CT-MEd	18-03-1992	PST	01-07-1997	"Trained Appointed"	"No Distt: Transfer"		01-07-1997	GHS BATTAGRAM		
196	ALAM ZEB	AMIN ULLAH	Sr.CT	15-04-1971	MA	CT-BEd	13-10-1988	PST	01-07-1997	"Trained Appointe"	"No Distt: Transfer"		01-07-1997	GHSS UMERZAI		
197	MURAD ALI	AKBAR ALI	Sr.CT	15-08-1972	MA/BSc/Bio/Ch(3rd)	CT-BEd	13-05-1992	QARI	01-07-1997	"Trained Appointed"	07-04-2001	Peshawar	01-07-1997	GHS NO TANGI NO-1		
198	HAWAYAT ULLAH	FAZAL KARIM	Sr.CT	05-03-1959	MA	CT	04-05-1985	PST	08-07-1997	"Trained Appointed"	"No Distt: Transfer"		08-07-1997	GHS HAJIZAI		
199	MUHAMMAD IRSHAD	NAZEER MUHAMMAD	Sr.CT	09-01-1966	MA	CT-BEd	26-01-1991	PST	08-07-1997	"Trained Appointed"	"No Distt: Transfer"		08-07-1997	GHS KATOZAI		
200	INAM ULLAH	SHAFI ULLAH	Sr.CT	25-04-1966	MA	CT-BEd	03-08-1987	PST	09-07-1997	"Trained Appointed"	01-09-1997	Peshawar	09-07-1997	GHS CHARSAKHA KHASS		
201	HIDAYAT ULLAH	SHAH PASAND	Sr.CT	09-04-1964	MA/BA	CT-BEd	08-11-1982	PST	10-07-1997	25-12-1993	30-04-1998	Peshawar	10-07-1997	GHS HARICHAND		
202	PEER MUHAMMAD	SAIF UR RAHMAN	Sr.CT	01-02-1968	MA/BA	CT-BEd	29-11-1990	PST	12-07-1997	"Trained Appointed"	"No Distt: Transfer"		12-07-1997	GHSS RAJJAR		
203	MARJAN ALI	KHANIM ULLAH	Sr.CT	18-09-1965	MA/BA(3rd Div.)	CT-BEd	29-07-1987	PST	15-07-1997	"Trained Appointed"	"No Distt: Transfer"		15-07-1997	GHSS DARGAI MANGA		
204	IMAM ALI	SHAKIR ALI	Sr.CT	20-02-1970	MA	CT-MEd	17-11-1988	PST	15-07-1997	"Trained Appointed"	"No Distt: Transfer"		15-07-1997	GHS CHARSAKHA NO.1		Retired 1.12.18
205	NIJAZ ALI	ALI AKBAR	Sr.CT	01-04-1968	MA	CT-BEd	07-07-1987	PST	21-07-1997	"Trained Appointed"	"No Distt: Transfer"		21-07-1997	GHS Rajjar No.1 Chd		
206	IFTIKHAR MUHAMMAD	KHAIR MUHAMMAD	Sr.CT	14-08-1967	MA/BA	CT-BEd	22-11-1987	PST	01-08-1997	"Trained Appointed"	04-01-2001	Mardan	01-08-1997	GHS NO-2 TURANGZAI		
207	ZIA UR RAHMAN	RIZWAN ULLAH	Sr.CT	15-09-1971	MA/BA	CT-MEd	17-03-1992	PST	12-08-1997	"Trained Appointed"	"No Distt: Transfer"		12-08-1997	GHS GUL KHITAB		
208	SYED IRFAN ULLAH	SYED INAYAT ULLAH	Sr.CT	07-09-1967	MA/BA	CT-BEd	22-08-1997	CT	22-08-1997	"Trained Appointed"	"No Distt: Transfer"		22-08-1997	GHSS BATTAGRAM		
209	FAZLI AKBAR	MUHAMMAD AKBAR	Sr.CT	03-08-1966	MA/BA	CT-Med/B.Ed	15-10-1988	PST	01-09-1997	"Trained Appointed"	21-07-1999	Peshawar	01-09-1997	GHS BEHLOLA		
210	KIFAYAT ULLAH	AMIR ZAMAN	Sr.CT	09-05-1968	MA/BA	CT-MEd	24-01-1991	PST	01-09-1997	"Trained Appointed"	01-08-1999	Nowshera	01-09-1997	GHS GEEDAR		
211	ILHAM	BAKHT RAWAN	Sr.CT	06-02-1969	MA/BA	CT-BEd	29-08-1988	PST	25-09-1997	"Trained Appointed"	"No Distt: Transfer"		25-09-1997	GHSS NISATTA		
212	SAMIN ULLAH	ABDUR RAZAQ	Sr.CT	03-10-1968	MA/BSc/MPh(3rd)	CT-BEd	07-12-1988	PST	28-09-1997	"Trained Appointed"	"No Distt: Transfer"		28-09-1997	GHSS SHABQADAR FORT		
213	MUHAMMAD ALI KHAN	KHANZAD GUL	Sr.CT	09-09-1964	MA/BA	CT-BEd	12-10-1988	PST	10-01-1998	"Trained Appointed"	21-08-1999	Peshawar	10-01-1998	GHS SHAKARDHAND		
214	ZAFAR ALI SHAH	MUHAMMAD RAHMAN	Sr.CT	10-01-1969	MA	CT-MEd	01-08-1986	AT	10-01-1998	"Trained Appointed"	"No Distt: Transfer"		10-01-1998	GHS HALEEMZAI		
215	SARFARAZ KHAN	HAJI SAFOAR KHAN	Sr.CT	06-10-1969	MA/BA	CT-Bad/M.Ed	13-11-1995	PST	10-01-1998	"Trained Appointed"	19-11-1998	Nowshera	10-01-1998	GHS IBRAHIMZAI		
216	FAZLI RAB	FAZLI WAHID	Sr.CT	02-01-1966	MA	CT-BEd	19-12-1987	PST	12-01-1998	"Trained Appointed"	"No Distt: Transfer"		12-01-1998	GHS RAHMAT ULLAH KHAN		
217	FAZLI MABOOD	FAZLI WAHID	Sr.CT	10-04-1971	MA/BA	CT-BEd	12-01-1998	CT	12-01-1998	"Trained Appointed"	01-08-1999	Nowshera	12-01-1998	GHS BARI BAND		
218	JAWAD ULLAH	FAIZ ULLAH KHAN	Sr.CT	17-05-1969	MA	CT	13-01-1998	CT	13-01-1998	"Trained Appointed"	01-06-2002	Peshawar	13-01-1998	GHSS UTMANZAI		
219	IJAZ AHMAD	MUMTAZ AHMAD	Sr.CT	28-04-1970	MA	CT-MEd	01-03-1993	PST	20-01-1998	"Trained Appointed"	"No Distt: Transfer"		20-01-1998	GHS TANGI NO.2		
220	INAYAT UR RAHMAN	FARRUKH SAIR	Sr.CT	18-04-1971	MA	CT-BEd	01-03-1993	PST	21-01-1998	"Trained Appointed"	"No Distt: Transfer"		21-01-1998	GHS TANGI NO.2		
221	NASIR KHAN	NADIR KHAN	Sr.CT	14-08-1970	MA/BA	CT-Med/B.Ed	18-03-1992	PST	24-01-1998	"Trained Appointed"	03-08-1999	Peshawar	24-01-1998	GHS ZUHRAB GUL KILLI		
222	SHAH WAZIR	MUHAMMAD ZAMAN	Sr.CT	16-02-1969	MA	CT-BEd	12-09-1987	PST	01-02-1998	"Trained Appointed"	"No Distt: Transfer"		01-02-1998	GHS SHAHBAZ KHAN		
223	SHERAZ	MUMTAZ	Sr.CT	04-04-1972	MA	CT-BEd	30-05-1990	PST	01-02-1998	"Trained Appointed"	23-07-1999	Nowshera	01-02-1998	GHS GUL ABAD TANGI		


Attested  


L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad: Qual:	Prof: Qual:	D/O/P/ Apptt In Edu Deptt	Desg: 1st Apptt:	D/T/O/C Present Post	D/O Passing Prof: Exam:	D/T/O/C in the Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
224	UMAR SAID	AIN UD DIN	Sr.CT	06-04-1965	MA/BA	CT-Med/B.Ed	12-09-1987	PST	09-02-1998	"Trained Appointed"	01-07-2008	Nowshera	03-02-1998	GHSS NISATTA	60
225	MUHAMMAD SAYAR	ABDUL GHAFAR	Sr.CT	03-04-1965	BA	CT	12-11-1995	CT	12-11-1995	31-03-1998	"No Distt: Transfer"		31-03-1998	GHS IBRAHIMZAI	
226	MUHAMMAD ISRAIL	MUHAMMAD IBRAHIM	Sr.CT	10-04-1965	MA/BA	CT-BEd	01-10-1985	CT	01-10-1985	"Trained Appointed"	01-05-1998	Mardan/Pesh:	01-05-1998	GHSS DOSEHRA	
227	HAYAT ULLAH	ROSHAN KHAN	Sr.CT	28-02-1973	BA	CT	01-09-1997	CT	01-09-1997	23-07-1998	25-03-2004	Peshawar	23-07-1998	GHS BABARA	
228	SANA ULLAH	SHAMSUL QAMAR	Sr.CT	12-12-1974	BA	CT-BEd	06-04-1999	CT	07-04-1999	"Trained Appointed"	01-04-2001	Peshawar	07-04-1999	GHS PRANG	
229	SHER ALI KHAN	ANWAR KHAN	Sr.CT	16-12-1962	BA/MA	CT-BEd	01-07-1994	CT	01-07-1994	11-05-1999	01-09-2008	Peshawar	11-05-1999	GHSS UMERZAI	
230	ZAKIR ULLAH	GUL DAD SHAH	Sr.CT	02-04-1971	MA	CT	01-07-1994	CT	01-07-1994	11-05-1999	27-08-2003	Peshawar	11-05-1999	GHSS UMARZAI	
231	MOHSIN ALI KHAN	ALI AHMAD	Sr.CT	02-05-1974	MA/BA	CT-BEd	25-01-1995	SV	25-01-1995	11-05-1999	01-08-1999	Nowshera	11-05-1999	GHS IBRAHIMZAI	
232	AKBAR ALI SHAH	RWIDAR	CT	04-01-1961	BA	CT	08-11-1995	CT	08-11-1995	11-05-1999	"No Distt: Transfer"		11-05-1999	GMS LANDAKI	Refused
233	KAUSAR ALI	FAZAL ILAHI	Sr.CT	04-05-1972	MA	CT	01-07-1999	CT	01-07-1999	"Trained Appointed"	"No Distt: Transfer"		01-07-1999	GMS SHAHEEDAN	
234	MUHAMMAD IBRAHIM	ZARIF KHAN	Sr.CT	24-12-1967	MA/BA	CT-BEd	01-03-1990	PST	20-04-1996	"Trained Appointed"	31-07-1999	Mohmand Agy:	31-07-1999	GHS RASHAKI	
235	HAZRAT SHAH	HAZRAT GUL	Sr.CT	25-09-1963	MA/BA	CT-BEd	01-11-1982	CT	01-11-1982	25-05-1998	01-08-1999	Swat	01-08-1999	GHSS MUHAMMAD NARI	
236	SHER AKBAR	HAZRAT KHAN	Sr.CT	15-10-1966	MA	CT-BEd	17-09-1986	PST	26-10-1995	"Trained Appointed"	01-08-1999	Mohmand Agy:	01-08-1999	GHSS SHAKOOR	
237	FEROZ KHAN	SAMI ULLAH	Sr.CT	20-03-1988	MA	CT-BEd	14-12-1999	CT	14-12-1999	"Trained Appointed"	15-09-2000	Peshawar	14-12-1999	GHS ZIARAT KILLI TANGI	
238	KHADIM SHAH	MUHAMMAD ALI	Sr.CT	01-04-1967	BA	CT-BEd	05-05-1990	CT	05-05-1990	27-02-1998	01-11-1999	Peshawar	01-11-1999	GHS TURANGZAI NO-02	
239	KHALIL ULLAH	HAMID ULLAH	Sr.CT	16-01-1964	MA/BSc(3rd)/BA	CT-MEd	01-10-1989	PST	08-08-1994	"Trained Appointed"	13-09-2000	Mohmand Agy:	13-09-2000	GHSS SHERPAO	
240	HABIB ULLAH	ABDUL GHAFAR	Sr.CT	15-03-1981	MA Pol Sc/History	CT-BEd	29-04-1984	SV	29-04-1984	29-11-1987	01-04-2001	Malakand Agy:	01-04-2001	GHSS MUHAMMAD NARI	
241	MUHAMMAD FAHEEM KHAN	AZIM KHAN	Sr.CT	16-08-1958	BA	CT	27-05-1981	SV	27-05-1981	29-11-1987	14-04-2001	Mohmand Agy:	14-04-2001	GHSS AMBADHER	Retired on 15.08.18
242	NOOR ALAM	SHER ALAM KHAN	Sr.CT	15-03-1969	MA	CT-MEd	06-04-1999	CT	06-04-1999	"Trained Appointed"	12-12-2001	Dir	12-12-2001	GHS UTMANZAI NO.2	
243	IRFAN ULLAH	RIFAT ULLAH	Sr.CT	18-04-1967	MA/BSc(3rd)	CT-BEd	24-12-1999	CT	24-12-1999	"Trained Appointed"	01-01-2002	Peshawar	01-01-2002	GHS MM KHEL NO.2	
244	MUHAMMAD KHALID KHAN	MUHAMMAD NIHAR KHAN	Sr.CT	20-10-1966	MSc(Agr)	CT	22-01-1991	PST	17-05-2003	"Trained Appointed"	"No Distt: Transfer"		17-05-2003	GHS UTMANZAI NO.2	
245	ZAHID ALI	HIKMAT SHAH	Sr.CT	20-12-1988	MA	CT	04-02-1990	PST	18-05-2003	"Trained Appointed"	"No Distt: Transfer"		18-05-2003	GCMHS TURANGZAI	
246	MAHBOOB ALAM	SHASHTI GUL	Sr.CT	08-12-1970	MA/BA	CT-MEd	15-12-1994	PST	18-05-2003	"Trained Appointed"	"No Distt: Transfer"		18-05-2003	GHS TANGI NO.1	
247	AKBAR SHAH	MUHAMMAD SHAH	Sr.CT	02-03-1976	MA/BA	CT-MEd	17-02-1998	PST	18-05-2003	"Trained Appointed"	"No Distt: Transfer"		18-05-2003	GHSS UMARZAI	
248	TAJ MUHAMMAD KHAN	AZIZ ULLAH JAN	Sr.CT	12-12-1973	MSc/BSc(Agr)	CT-MEd	01-09-1999	CT	01-09-1999	"Trained Appointed"	01-09-2003	Bajur Agy:	01-09-2003	GHS BEHLOLA	
249	MUHAMMAD NISAR	MUHAMMD SHER	Sr.CT	28-04-1976	BA	CT	26-03-1996	CT	26-03-1996	27-02-1998	01-09-2003	Peshawar	01-09-2003	GHS TURANGZAI NO-02	
250	FAIZ UR RAHMAN	HABIB UR RAHMAN	Sr.CT	25-04-1967	MA/BA	CT-BEd	21-11-1989	AWI	21-11-1989	"Trained Appointed"	17-04-2004	Mohmand Agy:	17-04-2004	GHS ZUHRAB GUL KILLI	
251	JAMAL SHAH	MUSAFAR KHAN	Sr.CT	20-12-1980	BA	CT	01-07-1985	AWI	01-07-1985	"Trained Appointed"	16-05-2004	Mohmand Agy:	16-05-2004	GHS LANDI SHAH	
252	NIAMAT ULLAH	MUHAMMAD AZIM	Sr.CT	15-03-1981	BA	CT-BEd	05-11-1985	PST	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS IBRAHIMZAI	
253	IMDAD KARIM	ABDUL HAKIM	Sr.CT	06-06-1964	MA/BA	CT-MEd	18-10-1982	PST	31-05-2004	17-01-1990	"No Distt: Transfer"		31-05-2004	GHS DHERI SIKANDAR KHAN	
254	FARHAD ALI	MUKARAM KHAN	Sr.CT	15-10-1964	MA	CT-BEd	01-10-1984	PST	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS SATTI ABAD	

*Accepted*  



No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad. Qual:	Prof. Qual:	D/O/F/ Apptt In Edu Deptt	Desg: 1st Apptt:	D/T/O/C Present Post	D/o Passing Prof. Exam:	D/T/O/C in this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks	
155	IRSHAD ULLAH	SHAKIR ULLAH	Sr.CT	09-03-1965	MA/BA	CT-BEd	23-10-1983	PST	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS KULADHER	61	
156	HABIB ULLAH	MULTAN KHAN	Sr.CT	08-08-1965	MA	CT-MED	26-10-1983	PST	31-05-2004	29-11-1987			31-05-2004	GHS HAJI ZAI		
157	WALI GUL	NIQAB GUL	Sr.CT	27-03-1967	MA/ BSC (Maths, A, B/Englis)	CT-BEd	23-10-1985	PST	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS SHABQADAR		
158	MUHAMMAD ANWAR	WAZIR ZADA	Sr.CT	27-04-1967	BA	CT-BEd	31-05-2004	CT	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS LANDI SHAH		
159	ZAKIR ULLAH	RAHIM ULLAH	Sr.CT	04-08-1970	MA/BA	CT-Med	29-11-1990	PST	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS MIAN ISA		
160	SHAIKAT ALI	SHER AFZAL	Sr.CT	05-09-1972	MA	CT	31-05-2004	CT	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS IBRAHIMZAI		
161	SABZ ALI	HAMISH GUL	Sr.CT	10-01-1973	BA	CT	31-05-2004	CT	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS GONDA SHABQADAR		
162	MUJAHID SHAH	MUHAMMAD JAMAL	Sr.CT	08-03-1976	BA	CT	31-05-2004	CT	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS PRANG		
163	AFTAB ALAM	MASUD SHAH	Sr.CT	01-01-1977	MA/BA	CT-Bed/MED	31-05-2004	CT	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS GUL ABAD TANGI		
164	MUHAMMAD ALI ARIF	ABDUSSALAM ARIF	Sr.CT	01-05-1979	BA	CT	31-05-2004	CT	31-05-2004	"Trained Appointed"	"No Distt: Transfer"		31-05-2004	GHS GARHI HAMID GUL		
165	MUHAMMAD KARIM	FAZLI RAHIM	Sr.CT	15-09-1958	MA/BA	CT-BEd	25-10-1982	PST	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHSS DARGAI MANGA		Retired on 14.9.18
166	AMAN GUL	TAZA GUL	Sr.CT	06-01-1984	MA	CT-BEd	01-03-1982	PST	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHS CHARSA DDA NO.1		
167	IHSAN AHMAD	AFZAL KHAN	Sr.CT	16-04-1964	MA/BA	CT-BEd	09-11-1983	PST	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHS HAJIZAI		
168	HAKEEM KHAN	MUSA KHAN	Sr.CT	01-01-1967	MA/BA	CT-Med	07-10-1985	PST	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHS MANI KHELA		
169	ALI RAHMAN	HABEEB UR RAHMAN	Sr.CT	01-04-1972	MA/B.com	CT-Med	20-02-1998	PST	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHS HAJIZAI		
170	RASHID JAN	MUHAMMAD AYAZ	Sr.CT	28-12-1973	MA/BA	CT-BEd	01-06-2004	CT	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHSS UTMANZAI		
171	ISRAR UD DIN	MUHAMMAD SHERIN	Sr.CT	20-02-1975	MA/ BA	CT-B-Ed/ Med	15-12-1994	PST	01-06-2004	"Trained Appointed"	"No Distt: Transfer"		01-06-2004	GHS NO.1 TANGI		
172	NAIZ UD DIN	MOHIB JAN	Sr.CT	02-02-1967	BA	CT	25-08-1987	PST	15-11-1999	"Trained Appointed"	01-08-2004	Dir (U)	01-08-2004	GHS GANDHERI		
173	SAJJAD ALI	MUHAMMAD ALI	Sr.CT	04-04-1983	MA	CT-BED	04-11-2004	CT	04-11-2004	"Trained Appointed"	"No Distt: Transfer"		04-11-2004	GHS RAJJAR NO-01		
174	FAZLI RAHMAN	NASRULLAH	Sr.CT	28-03-1966	MA	CT	08-10-1985	PST	01-07-2005	"Trained Appointed"	"No Distt: Transfer"		01-07-2005	GHSS DOSEHRA		
175	ALI RAHMAN	YAR ZAMAN KHAN	Sr.CT	04-04-1972	MA	CT-BEd	27-11-2005	CT	27-11-2005	"Trained Appointed"	"No Distt: Transfer"		27-11-2005	GHS IBRAHIMZAI		
176	GHARIB NAWAZ	SHAH NAWAZ	Sr.CT	08-01-1958	MA/BA	CT-BEd	02-11-1981	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHSS BATTAGRAM	Retired on 7.01.2018	
177	SUBHAN ULLAH	HASHAM KHAN	Sr.CT	16-05-1980	MA/BA	CT-BEd	18-10-1982	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHSS BATTAGRAM		
178	FIDA MUHAMMAD	FAZAL MUHAMMAD	Sr.CT	06-11-1960	MA	CT	20-03-1983	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHS DALAZAK		
179	KASHMIR KHAN	MASAL KHAN	Sr.CT	12-07-1961	BA	CT	01-10-1984	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHSS BATTAGRAM		
180	ZAHEER GUL	FAZL-E-WAHID	Sr.CT	08-08-1984	MA	CT	20-11-1984	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHSS TARNAB		
181	MUHAMMAD ISRAR	RAHMAT GUL	CT	20-12-1964	MA	CT	04-10-1985	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GMS AMIR ABAD RAJJAR		
182	RIAZ ULLAH	QAMAR DIN	CT	16-10-1965	MA	CT	29-01-1985	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHS HALEEMZAI		
183	ABDUL AZIZ	FIRDUS GUL	CT	25-12-1965	MA	CT-BED	17-09-1986	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHS BARI BAND		
184	MAJNOON KHAN	SADIQEEEN	CT	11-07-1967	MA/ BA	CT-BEd	17-09-1986	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GMS SALIKH ABAD		
185	NAIK AMAL SHAH	ABDUR RAHIM	CT	18-01-1975	MA	CT-BEd	23-06-1997	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHSS UTMANZAI		
186	KARIM GUL	ABDULLAH SHAH	CT	15-04-1975	MA/BA	CT-BEd	19-04-1999	PST	02-12-2005	"Trained Appointed"	"No Distt: Transfer"		02-12-2005	GHS MERA GUL ABAD		

*Atter Tea*






L.No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad. Qual:	Prof. Qual:	D/O/F/ Apptt In Edu Dept	Deeg: 1st Apptt:	D/T/O/C Present Post	D/o Passing Prof. Exam:	D/T/O/C in this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
287	AMJID ALI	SHER MUHAMMAD	CT	24-03-1979	MA/BA	CT-BEd	20-11-2006	CT	20-11-2006	"Trained Appointed"	"No Distt: Transfer"		20-11-2006	GMS DADO KILLI	62
288	SHEREEN KHAN	SHAHZADA	CT	20-01-1962	MA	CT	18-04-1982	PST	01-12-2006	"Trained Appointed"	"No Distt: Transfer"		01-12-2006	GMS NAWAN KILLI	
289	NAEEM AKBAR	FAZLI AKBAR	CT	01-04-1962	MA	CT-BEd	10-12-1985	PST	01-12-2006	"Trained Appointed"	"No Distt: Transfer"		01-12-2006	GCMHS TURANGZAI	
290	YAR MUHAMMAD KHAN	KHAN RAZIQ	CT	18-02-1967	MA	CT-MEd	22-12-1994	PST	01-12-2006	"Trained Appointed"	"No Distt: Transfer"		01-12-2006	GHSS TARNAB	
291	DAULAT KHAN	SAYED AHMAD SHAH	CT	08-03-1974	MA	CT-BEd	13-11-1995	PST	01-12-2006	"Trained Appointed"	"No Distt: Transfer"		01-12-2006	GMS ZIARAT KILLI	
292	AMIR NAWAZ KHAN	ABBAS KHAN	CT	10-10-1960	BA	CT-BEd	07-05-1980	PST	02-12-2006	28-11-1987	"No Distt: Transfer"		02-12-2006	GMS MANDEZAI	
293	ZAHIR SHAH	ISRAR MUHAMMAD	CT	04-11-1963	MA	CT-BEd	04-11-1987	PST	02-12-2006	"Trained Appointed"	"No Distt: Transfer"		02-12-2006	GMS SHAH DHAND	
294	IFTIKHAR KHAN	GUL KHAN	CT	02-03-1978	MA	CT-BEd	18-02-1998	PST	02-12-2006	"Trained Appointed"	"No Distt: Transfer"		02-12-2006	GHS KHWAJA HAWAS	
295	WAZIR ZADA	AZIM JAN	CT	10-01-1982	BA	CT	14-11-1982	PST	06-04-1999	"Trained Appointed"	15-05-2007	Dir	15-05-2007	GHS MUHAMMAD NARI	
296	MIR ALAM SHAH	ABDUL MATEEN	CT	18-05-1970	MA/BA	CT-BEd	28-08-1992	PST	09-07-2002	"Trained Appointed"	01-09-2007	Dir (L)	01-09-2007	GHSS UMARZAI	
297	RIAZ KHAN	KHALIL UR RAHMAN	CT	12-04-1978	MA	CT-MEd	14-04-1999	CT	14-04-1999	"Trained Appointed"	31-10-2007	Peshawar	31-10-2007	GMS TARKHA FAQIR ABAD	
298	SIYAR MUHAMMAD	MIRA KHAN	CT	07-03-1965	BA	CT	15-04-1988	CT	15-04-1988	02-04-1992	01-07-2008	Swabi	01-07-2008	GHSS DOSEHRA	
299	JAN BADSHAH	GUL BAD SHAH	CT	30-04-1969	MA/BSc(M/Stat)	CT-BEd	25-04-1996	CT	25-04-1996	16-04-1998	01-09-2008	Bajar Agency	01-09-2008	GHS HARICHAND	
300	AHMAD JAN	MUHAMMAD ROSHAN	CT	14-02-1982	BA/MA	CT	28-02-2009	CT	28-02-2009	"Trained Appointed"	"No Distt: Transfer"		28-02-2009	GMS SHEIKHO SARDHERI	
301	MAQSOOD AHMAD	FAZLI RAHIM	CT	10-05-1973	MA	CT-MEd	15-12-1994	PST	03-03-2009	"Trained Appointed"	"No Distt: Transfer"		03-03-2009	GMS AJOON KILLI	
302	MUDASSIR SHAH	HASSAN SHAH	CT	24-05-1980	MA	CT-LLB-Bed/MED	09-03-2009	CT	09-03-2009	"Trained Appointed"	"No Distt: Transfer"		09-03-2009	GHS KULADHAND	
303	ALLAH YAR KHAN	MUHAMMAD RAMZAN	CT	16-04-1974	MA/BA	CT-BEd	19-02-1998	PST	14-03-2009	"Trained Appointed"	"No Distt: Transfer"		14-03-2009	GHS TANGI NO.1	
304	ZUBAIR SHAH	IZAT KHAN	CT	30-09-1980	BA	CT-BED	24-04-2009	CT	24-04-2009	"Trained Appointed"	"No Distt: Transfer"		24-04-2009	GHS HARICHAND	Suspended
305	HAYAT KHAN	JALAT KHAN	CT	02-02-1977	MA	CT-BEd	30-09-2003	CT	30-09-2003	"Trained Appointed"	31-10-2009	Mohmand Agy.	31-10-2009	GHSS DARGAI MANGA	Transfer to Mardan
306	SHAKEEL AHMAD	BASHIR GUL	CT	13-09-1983	BA/MA	CT-BEd	11-11-2009	CT	11-11-2009	"Trained Appointed"	"No Distt: Transfer"		11-11-2009	GMS AMIR ABAD RAJJAR	
307	BADI-UZ-ZAMAN	SHAH JEHAN	CT	15-02-1959	MA/BA	CT-MEd	23-10-1993	AT	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHS BABARA	
308	GUL SIYAR	SHAHZAD GUL	CT	20-04-1980	BA	CT	19-10-1982	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GMS DHERI HAMID MIAN	
309	SEFAT ULLAH	INAYAT ULLAH	CT	01-05-1962	MA/BA	CT-BEd	10-11-1986	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHS AMBADHER	
310	BARAKAT GUL	FAQEER MUHAMMAD	CT	08-02-1984	FA	CT	20-03-1988	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GMS DHERI ZARDAD	
311	ZAHIR ULLAH	MUHAMMAD AZIM	CT	02-10-1984	MA/BA	CT-BEd	15-04-1987	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GMS DHERI GHAZGI	
312	AYAZ ALI	MEHIR DIL KHAN	CT	02-01-1988	MA/BAM,Phd	CT-MEd	07-02-1985	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHSS UTMANZAI	
313	MUSAFAR KHAN	SAID BADSHAH	CT	12-03-1967	BA	CT	17-09-1988	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHSS DOSEHRA	Retired on 01.10.2018
314	SYED MUSARRAT SHAH	SHER BADSHAH	CT	25-10-1967	MA/BSc(3rd Div.)	CT-BEd	18-07-1987	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GMS ISLAMABAD NO.2	
315	BACHA JAN	GUL RAHMAN	CT	10-02-1988	MSc/BSc(M/Stat)	CT-MEd	21-02-1998	QARI	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHS UTMANZAI NO.2	
316	NOOR UL HAYAT	GUL HASSAN	CT	14-03-1968	MA/BA	CT-BEd	17-09-1986	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GMS TANGI	
317	HAKIM ULLAH	IHSAN ULLAH	CT	14-04-1968	MA	CT-BEd	13-10-1988	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GMS UTMANZAI	
318	SABZ ALI KHAN	MEHER ZAMAN	CT	03-03-1976	MA	CT-BED	12-03-2007	PST	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHS BATTAGRAM	

No.	Teacher Name	Father Name	Present Desig:	Date of Birth	Acad: Qual:	Prof: Qual:	D/O/P/ Apptt In Edu Deptt	Desig: 1st Apptt:	D/O/C Present Post	D/O Passing Prof. Exam:	D/O/C in this Distt If Transferred From Other Distt:	Distt: From Which Transferred	Date on Which Seniority Applied	Present School	Remarks
119	MUHAMMAD ARIF	WASAL KHAN	CT	03-01-1978	MA	CT	01-11-2010	CT	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHSS UTMANZAI	63
120	SAJJAD MUHAMMAD	NISAR MUHAMMAD	CT	15-12-1978	MA	CT	01-11-2010	CT	01-11-2010	"Trained Appointed"	"No Distt: Transfer"		01-11-2010	GHSS UTMANZAI	
321	MURSHID UR HAQ	MOULANA SHAMS UL HAQ	CT	15-09-1977	MA	CT	01-11-2010	CT	01-11-2010				01-11-2010	GMS GONDA	
322	GOHAR ALI	HAJI MOHABAT KHAN	CT	09-06-1964	MA/BA/B.ED	CT-MEd	17-09-1986	PST	02-11-2010	"Trained Appointed"	"No Distt: Transfer"		02-11-2010	GHSS MUHAMMAD NARI	
323	IRSHAD ALI	RAHAT ULLAH	CT	04-09-1966	MA	CT-BEd	21-09-1986	PST	02-11-2010	"Trained Appointed"	"No Distt: Transfer"		02-11-2010	GMS DAB BANDA	
324	MUJAHID	SAID RAHMAN	CT	27-04-1970	MA	CT	02-11-2010	CT	02-11-2010	"Trained Appointed"	"No Distt: Transfer"		02-11-2010	GMS MAHMOOD ABAD	
325	ABDUL HAQ	FAZLI RABI	CT	01-10-1970	BA	CT	02-11-2010	CT	02-11-2010	"Trained Appointed"	"No Distt: Transfer"		02-11-2010	GHSS RAJJAR	
326	PAZEER AHMAD	SHAHZAD GUL	CT	28-10-1962	BA	CT	12-03-1986	PST	03-11-2010	"Trained Appointed"	"No Distt: Transfer"		03-11-2010	GHS SRO KILLI	
327	MUHAMMAD SHAFIQ	MUHAMMAD RAFIQ	CT	11-01-1981	MA	CT	11-11-2010	CT	11-11-2010	"Trained Appointed"	"No Distt: Transfer"		11-11-2010	GCMHS TURANGZAI	
328	GHUFRAN UD DIN	SUBHAN UD DIN	CT	01-09-1967	MA	CT-BEd	01-02-1988	PST	01-12-2010	"Trained Appointed"	"No Distt: Transfer"		01-12-2010	GMS AMIR ABAD RAJJAR	
329	SADEEQ AHMAD	TILA MUHAMMAD	CT	07-07-1971	BA	CT-BEd	13-08-1999	CT	13-08-1999	10-08-2000	01-02-2011	Peshawar	01-02-2011	GHS CHARSADDA KHASS	
330	HAROON AHMAD	MUSLIM KHAN	CT	16-01-1981	MA	CT	01-04-2011	CT	01-04-2011	"Trained Appointed"	"No Distt: Transfer"		01-04-2011	GMS MIAN KILLI SHABQADAR	
331	AHMAD JAN	MUHAMMAD ZAFAR	CT	15-12-1985	BA	CT	23-09-1987	PST	01-10-2011	"Trained Appointed"	"No Distt: Transfer"		01-10-2011	GMS AJOON KILLI	
332	BACHA KHAN	SARDAR KHAN	CT	02-02-1970	MA/BA	CT-MEd	21-12-1994	CT	21-12-1994	"Trained Appointed"	01-03-2012	FATA	01-03-2012	GHS SOOR KAMAR	
333	SHAIKAT ALI	IHSAN UD DIN	CT	28-03-1978	MA/BA	CT-BED	11-05-2012	CT	11-05-2012	"Trained Appointed"	"No Distt: Transfer"		11-05-2012	GHS BOOBAK	
334	NOOR ALAM	HAROON KHAN	CT	04-04-1974	MA/BA	CT-B.Ed/M.Ed	14-11-1995	PST	12-05-2012	"Trained Appointed"	"No Distt: Transfer"		12-05-2012	GHS Mardhand	
335	GOHAR ALI	GUL FARAZ	CT	01-02-1981	MA	CT	14-05-2012	CT	14-05-2012				14-05-2012	GMS SHAHDHAND	
336	DAUD SHAH	MUHAMMAD SHAH	CT	01-10-1982	MSc	CT-MEd	08-11-2007	Lab. Asst:	26-05-2012	"Trained Appointed"	"No Distt: Transfer"		26-05-2012	GHSS TARNAB	
337	WAQAR AHMAD	IHSAN-UD-DIN	CT	20-03-1987	MA	CT-Bed/MED	12-06-2007	Lab. Asst:	31-05-2012	"Trained Appointed"	"No Distt: Transfer"		31-05-2012	GHS Sheikh Sardheri	
338	MUHAMMAD ISMAIL	FAZAL SHAH	CT	10-03-1987	MA	CT	01-09-2012	CT	01-09-2012				01-09-2012	GMS PALAI	
339	SHAH HUSSAIN	HUSSAIN ZADA	CT	09-04-1959	BA	CT	31-12-2012	CT	01-01-2013	"Trained Appointed"	"No Distt: Transfer"		01-01-2013	GMS SHAHEEDAN	
340	JAN ALAM	MUHAMMAD IRFAN	CT	01-04-1963	MA	CT	08-01-2013	CT	08-01-2013	"Trained Appointed"	"No Distt: Transfer"		08-01-2013	GMS LANDAKI(Required order)	
341	MUHAMMAD SHAH	SAID JAN	CT	22-11-1964	BA	CT	31-12-2012	CT	15-01-2013	"Trained Appointed"	"No Distt: Transfer"		15-01-2013	GMS SHAHEEDAN	
342	JEHANZEB	ADAM KHAN	CT	03-01-1966	MA	CT	01-02-2013	CT	01-02-2013	"Trained Appointed"	"No Distt: Transfer"		01-02-2013	GHS CHARSADDA KHASS	
343	DAWOOD SHAH	AKHTAR SHAH	CT	05-01-1985	MA	CT	12-05-2014	CT	12-05-2014	"Trained Appointed"	"No Distt: Transfer"		12-05-2014	GMS AZIZ ABAD	
344	MUZZAM JAN	PAINDA KHAN	CT	19-09-1987	MSc	CT	12-05-2014	CT	12-05-2014	"Trained Appointed"	"No Distt: Transfer"		12-05-2014	GMS AZIZ ABAD	
345	SHABEER AHMAD	SAIF UR REHMAN	CT	15.01.82	MA	CT-BED	07-03-2009	PST	31-05-2014	"Trained Appointed"	"No Distt: Transfer"		31-05-2014	GHS BATTAGRAM	
346	SHER ZAMAN	ALI KHAN	CT	02-02-1963	MA	CT-BED	24-11-1981	PST	22-11-2014	"Trained Appointed"	"No Distt: Transfer"		22-11-2014	GHS Sheikh Sardheri	
347	FAZL-E-WADOOD	FAZLI MULA	CT	01-01-1964	MA	CT	08-12-1982	PST	22-11-2014	"Trained Appointed"	"No Distt: Transfer"		22-11-2014	GMS NO 2 CHARSADDA	
348	SADIQ ULLAH	RAHMAN ULLAH	CT	21-10-1967	MA	CT-BED	12-10-1988	PST	22-11-2014	"Trained Appointed"	"No Distt: Transfer"		22-11-2014	GHSS NO 1 CHARSADDA	
349	FAZAL KHAN	ASLAM KHAN	CT	12-06-1966	MA	CT	28-01-1985	PST	22-11-2014	"Trained Appointed"	"No Distt: Transfer"		22-11-2014	GHS AGRA	
350	MUHAMMAD FAYAZ	ABDUL WAHID	CT	01-01-1964	BA	CT	29-01-1985	PST	22-11-2014	"Trained Appointed"	"No Distt: Transfer"		22-11-2014	GHS AGRA	

*Attended*  




قیمت 50 روپے	0669	  
ایڈویکٹ:	بار کونسل / ایسوسی ایشن نمبر: ۱۵۶۶۱-۱۵۶۶۱	
	رابطہ نمبر: ۰۳۶۵-۶۲۳۳۷۶۲	پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سرور سہیل فیصلہ جنتو خواہ پشاور

مخائب: Appellant باپا خان	دعویٰ: مہریش انزل
باپا خان	علت نمبر: ۳۸/۱۹
بنام	مورخہ:
گورنمنٹ آف خیبر پختونخوا	جرم:
وعتیہ	تھانہ:

### باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 کیلئے پھر عسکر اللہ جان اینڈ میں محمد عسکر اینڈ دیگر کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثابت و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخیت منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانے التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سدر ہے  
 المرقوم: ۰۶/۰۱/۲۰۱۹

مقام: پشاور کے لیے منظور ہے۔



نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Accepted  
 M. Uzairullah  
 Advocate

M.M. Imran AHC

باپا خان وکیل سرور سہیل فیصلہ جنتو خواہ

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No. 38/2019

Bacha Khan

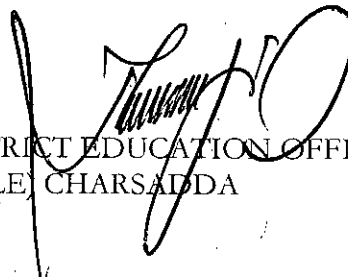
Vs

Government of KPK & others

Written comments on behalf of Respondents

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DISTRICT EDUCATION OFFICER  
(MALE) CHARSALDA

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No. 38/2019

Bacha Khan

Vs

Government of KPK & others

**Written comments on behalf of Respondents**

Respectfully Sheweth:

**Preliminary Objections:**

- A. That the Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore, the Appeal is liable to be rejected/ dismissed.
- C. That the Appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory costs in favour of Respondents.
- D. That no legal right of the appellant has been violated, therefore, the appellant has no right to file the instant appeal.
- E. That the Appellant is completely estopped/precluded by his own conduct to file this Appeal.
- G. That the Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from mis-statements and concealment of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Appellant has no right to file the instant Appeal and the Hon' able Services Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the instant appeal is barred by law and limitation.

**PARA WISE REPLY ON FACTS:**

1. The Para is based on facts, therefore, needs cogent evidence.
2. That the appellant has been transferred on his own choice from FATA Directorate to District Peshawar while possessing the district cadre post.
3. The Para needs no comments.

4. The appellant again transferred to District Charsadda with the conditions that the seniority of the appellant be determined at the bottom of the seniority list with the other counter parts in district Charsadda, mentioned in office order dated 07/02/2012. Annexed with the appeal on page 15.
5. The referred judgment is not relevant to the case of the appellant, because the Act 2009 was for those employees who were appointed in the specific period mentioned in that Act.
6. Incorrect, the case of the appellant is not covered by the judgment referred by the appellant, because the appellant has been transferred from FATA to Peshawar and then from Peshawar to Charsadda, therefore, as a result the seniority of the appellant has been placed at his proper place with the counter parts in district Charsadda.
7. That according to law, rules and policy the appellant is not entitled to any kind of seniority.
8. That according to the rules the appellant is not entitled to promotion being junior in district Charsadda.
9. That the appellant has been placed correctly in the seniority list at serial No. 332, because of his several transfers from Mohmand Agency to district Peshawar and then to district Charsadda.
10. That the appellant is not an aggrieved party, hence, can't file the instant appeal inter-alia on the following grounds.

PARA WISE REPLY ON GROUNDS.

- A. Incorrect, the appellant is much below on the seniority list, therefore, has no right to be promoted.
- B. That the appellant may be highly qualified but as is at the bottom of the seniority list, therefore, can't be promoted while the other deserving employees have been promoted.
- C. The appellant may have severed the department but has no right as is at the bottom of the seniority list due to several out-district transfers.
- D. Incorrect, the appellant is at bottom of the seniority list, hence, can't be promoted.
- E. That the Answering Respondents are duty bound to follow the laws and rules on the subject.

F. Incorrect, the seniority of the appellant can't be remained intact as was in Mohmand Agency rather be kept in bottom with the other counter parts after his transfer to district Charsadda.

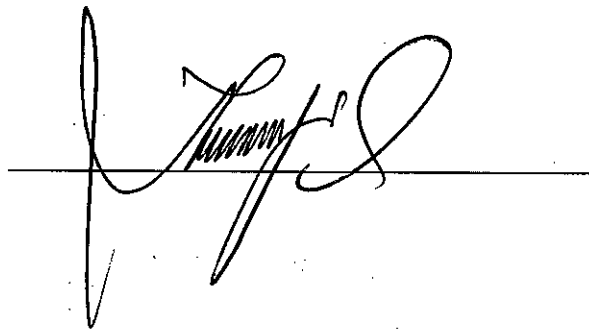
G. That the Answering Respondents seek permission to advance other grounds at the time of hearing of the appeal.

**PRAYER.**

It is, therefore, humbly prayed that as the appellant is having district cadre post has been transferred to Peshawar from FATA and then to Charsadda and due to that reason his seniority has been placed at the bottom in district Charsadda, hence, is not entitled for promotion, rather be promoted at his own turn, therefore, the appellant is not entitled for any kind of relief and this Hon'ble Tribunal may graciously be pleased to dismissed the appeal in favour of Answering Respondents with heavy cost.

**Respondent**

5. The District Education Officer (Male) Charsadda.

A handwritten signature in black ink, written over a horizontal line. The signature is stylized and appears to be the name of the District Education Officer (Male) Charsadda.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No. 38/2019

Bacha Khan

Vs

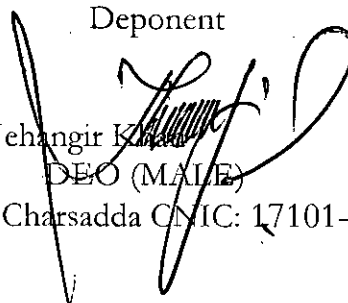
Government of KPK & others

**Written comments on behalf of Respondents**

AFFIDAVIT

I Mr. Jehangir Khan DEO (M) Charsadda do hereby solemnly affirms that the contents of the Para-wise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able court.

Deponent

  
Jehangir Khan  
DEO (MALE)  
Charsadda CNIC: 17101-

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

Service Appeal No. 08/19

**Bacha Khan (CT)** BPS-15, Government High School, Sur Kamar, District Charasadda

VS

Government of Khyber Pakhtunkhwa through Chief Secretary Et. Al.


**INDEX**

<b><u>S.NO</u></b>	<b><u>DOCUMENTS</u></b>	<b><u>FLAG</u></b>	<b><u>PAGE</u></b>
01.	Rejoinder		1-3
02.	Copy of the 1217/2012 and the Order Dated: 03/01/2014 is attached as R/A)	A	4-11

Through

(Bacha Khan)  
Appellant

(Mian Muhammad Imran)  
Advocate High Court



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

Service Appeal No. \_\_\_\_\_

**Bacha Khan (CT)** BPS-15, Government High School, Sur Kamar, District Charasadda

VS

Government of Khyber Pakhtunkhwa through Chief Secretary Et. Al.

**REJOINDER ON BEHALF OF THE APPELLANT**

The Appellant is pleased to beseech before this Honorable Tribunal as under;

**Preliminary Objection:**

All the objections raised by the Respondents are baseless and incorrect.

**Facts:**

1. Para No. 01 is admitted as correct.
2. Para No. 02 is vehemently denied because the appellant was transferred by the competent authority in the best interest of public and as per direction of the competent authority, the appellant started performing duties at district "Peshawar".
3. Para No. 03 is admitted as correct hence no reply is required.
4. Para No. 04 is denied because the vires of the specific rule i.e. Rule 08 (2) APT Rules, 1989 has already been challenged in the appeal in hand. It is also added that the appellant has been appointed in the year 1994 on the post of "CT", and since then, he has not been promoted despite the fact that he is one of the senior teacher on the post in question. Let's suppose, if the appellant is granted seniority on the same post since his inception date, there is no doubt that he would be having a conspicuous position in the seniority list and he will get promotion. Furthermore, there are a number of cases where even despite of the existence of the same impugned rules, the employees who were transferred from one district to other were kept in the in the seniority list on the same position as per their initial appointment which is no doubt, discrimination and crippling of



the fundamental rights of the appellant. (Copy of the 1217/2012 and the Order Dated: 03/01/2014 is attached as R/A)

- 5. Para No. 05 is denied as the High Court Judgment is rightly applicable on the appellant because the petitioner has been appointed in the year 1994 while the said judgment has clear mandate that the persons (employees) to be considered for promotion till the backlog is washed out.
- 6. Same as Para No. 05
- 7. Para No. 07 is denied as the appellant has been appointed in the year 1994 and since his initial appointment, he has never been promoted which is against the mandate of constitution and the principle of "legitimate expectation."
- 8. Vehemently denied as the relevant promotion policy says that for promotion to the said post, the requirement is 05 years of service and qualification of B.A, M.Ed or B.Ed which is rightly equipped by the appellant keeping in view the probity that the appellant has got more than two decade of service on his credit. Hence, ignoring him is violation of his fundamental rules and equity.
- 9. Vehemently denied because the rule 8(2) of APT Rules, 1989 has been challenged and the placement of the appellant at serial no. 332 in the seniority list from the date of his transfer to district Charsadda is tantamount to spoiling his more than 18 years of pain-staking service which is not only against the constitution but also against the natural justice.
- 10. The appellant's rights have been violated.

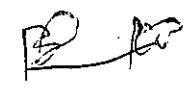
**GROUND:**

- A. Vehemently denied because the placement of the appellant at serial no. 332 is tantamount to spoiling his more than 18 years of this service and against doctrine of "Legitimate Expectation".
- B. The appellant has got the required experience and qualification but still he has been ignored promotion which is against the fundamental rights granted by the constitution of Pakistan 1973.
- C. Denied because true that the appellant has been transferred from one district to other but the department has remained the same, neither he has been sent on deputation nor to any other province but served and still serving in the same department hence, keeping him in the bottom of the seniority list is un-warranted by law.

- D. Denied. The judgment has mandated that the backlog needs to be washed out for promotion of the in-service employees but still he has been ignored to be promoted.
- E. The Rule 8(2) of the APT Rules, 1989 is against the fundamental rights of the constitution of 1973 of Pakistan because the appellant has been serving in the same department since his inception and never been posted to any other autonomous body or any other department or on deputation basis along with the fact that he has been transferred time and against in the public interest, thus, the non-promotion of the appellant is against the mandate of the constitution and violation of the fundamental rights.
- F. Denied because the Rule 8(2) of APT Rules, 1989 is against the fundamental rights of the appellant because it is against the spirit of Article 2-A, 04, 08, 25 and 27 of the constitution of Islamic Republic of Pakistan 1973 because to spoil the more than 18 years of the appellant service is crippling his career and is a unlawful hurdle in ways of his promotion.
- G. Legal.

**PRAYER:**


In light of the above submissions, the reply of the Respondent(s) may be rejected and the appeal of the appellant may graciously be accepted and the rules i.e. Rule 8 (2) of APT Rules, 1989 regarding placement of the appellant/civil servants at the bottom of the seniority list after getting transferred from one district to other district may be decalred ultra vires, void ab-initio, and against the fundamental rights guraranteed by the Constitution of Islamic Republic of Pakistan 1973 and to consider the appellant for the post of "SST" for the best administration of justice and fair-play



Appellant

**Bacha Khan (CT)**

Through



**(Mian Muhammad Imran)**  
Advocate High Court



(4)  
R/A

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

APPEAL NO. 126 / 2012

Serial No. 126  
Date 23/10/12

KHALID JAN S/O ABDUL HAQ R/O VILLAGE TANGI BARAZAI DISTRICT CHARSADDA PRESENTLY POSTED AS D.M AT GOVERNMENT MIDDLE SCHOOL AJON KALI TURANGZAI DISTRICT CHARSADDA.

-----APPELLANT.

VERSUS.

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.
2. DIRECTOR ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.
3. DEPUTY DIRECTOR (ESTAB) ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.
4. EXECUTIVE DISTRICT OFFICER (ELEMENTARY & SECONDARY) CHARSADDA

ATTESTED

*[Signature]*  
Secretary  
Khyber Pakhtunkhwa  
Services Tribunal  
Peshawar

23/10/12

-----RESPONDENTS.

APPEAL AGAINST THE IMPUGNED ORDER DATED 11/10/2012 WHEREBY THE APPELLANT DEPARTMENTAL REPRESENTATION WAS NOT ACCEPTED/REJECTED.

PRAYER:

ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDER 11/10/2012 MAY KINDLY BE SETASIDE., THE APPELLANT SENIORITY MAY KINDLY BE COUNTED FROM THE DATE OF HIS JOINING OF SERVICE AS D.M AND THE SENIORITY LIST ISSUED BY RESPONDENTS BY PLACING APPELLANT AT SERIAL NO.126 IS ILLEGAL, BASED ON DISCRIMINATION, IN VIOLATION OF LAW AND THE SAME IS

Co-submitted co-  
and filed.

23/10/12

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LIABLE TO BE AMENDED ACCORDINGLY BY CONSIDERING  
THE SENIORITY OF APPELLANT IN ACCORDANCE WITH LAW.

RESPECTFULLY SHEWETH; -

Brief facts leading to the instant appeal are as under:-

1. That the competent departmental selection committee of respondents appointed Appellant alongwith others vide order dated 12/11/1990 as D.M in BPS-9 and since his appointment appellant is performing his duties with full zeal and zest, with unblemished record.

(Copy of appointing order and other documents are annexed).

2. That vide order No. 1960-67 dated Peshawar 16/05/2007 the competent authority pleased to transfer the appellant from GHS Abazai Tangi Charsadda to GMS Wazir Bagh No.1 Peshawar in the interest of public service.

(copy of the order dated 16/05/2007 is Annexed)

3. That the Appellant while performing his duties with full zeal and zest in District Peshawar for Four(4) Years was again Transfer on the basis of Mutual transfer to GMS Ajoon Kali Mera Turangzai Charsadda vide order No. 1295-1303 dated Peshawar 13/06/2011.

(Copy of the order dated 13/06/2011 is annexed).

4. That since the Transfer of the Appellant to GMS Ajoon Kali Mera Tuangzai, appellant is performing his duties to the entire satisfaction of his superior with no complaint of any sort, the respondents have issued the seniority list of D.M(MALE) District Charsadda, wherein to the great surprise of the appellant, Appellant is placed at serial No. 26 of the seniority list malafidly.

(Copy of seniority list is annexed)

5. That the appellant feeling himself aggrieved from the seniority list filed his departmental representation before respondents on 22/09/2012 but the same was not

... the approval/Ban

6

accepted and the appellant was informed through letter No. 10835 dated 11/10/2012.

(Copy of appellant representation and order dated 11/10/2012 are annexed)

6. That the respondent No. 3 rejected the representation of the appellant vide impugned order dated 11/10/2012 and appellant being aggrieved from the seniority list wherein appellant is placed at serial No. 126; hence this Appeal on the following grounds inter—alia:-

**GROUNDS:-**

A. That the appellant has performed his services as D.M for 22 long years and the respondents while issuing the impugned seniority list ignored the services of the appellant, hence the act of placing appellant on serial No. 126 of the seniority list is illegal, against the law, malafide and is liable to be corrected accordingly.

B. that respondents have failed to appreciate the service performed in District Charsadda for more than 17 years because the services rendered at District Peshawar on the basis of Mutual transfer is 4 years but the respondents illegally deprived the appellant for the services of 17 years performed by the appellant even by excluding the 4 years services, hence the seniority list issued by the respondents is liable to set aside.

C. That the respondent No. 3 impugned order reads as " I am directed to refer to your letter No. 586 dated 24/09/2012 on the subject noted above and to ask you to inform the teacher concerned that he is not entitled for seniority from the date of taking over charge against the post of DM as his mutual order was issued on his own request please" while perusing the said mutual transfer order the same read as " consequent upon the approval/Ban

ATTESTED

E. K. ARJUNER  
Member Peshawar  
Service Tribunal  
Peshawar

relaxation given by the competent Authority the following Mutual Transfer are hereby ordered on their own pay and EPS in the interest of PUBLIC SERVICE w.e.f the date their taking over charge", hence on perusal of the both orders the order of refusal of departmental representation of the appellant is illegal and is liable to be setaside.

N ← D. That the Appellant is discriminated on the matter of seniority and as per 2010 PLC(C.S) 701 " policy of pick and choose on the part of state functionaries was an anathema to the right of equal treatment and non discrimination: guaranteed to the citizens under the constitution", hence the impugned order is based on discrimination and illegal.

E. That the impugned order as well as the seniority list wherein appellant is at Serial No. 126 are illegal, malafide, without jurisdiction, without lawful authority and are liable to be setaside forthwith.

N ← F. That according to section 8 of N.W.F.P Civil Servants Act 1973 sub section 3 " seniority on initial appointment to a service, Cadre or post shall be determined as may be prescribed", hence the seniority list issued by respondents by denying the long service of appellant is illegal, malafide and is liable to setaside.

G. That the impugned act of the respondents is based on discrimination, against the law on the subject, malafide and is ineffective upon the appellant rights.

H. That other grounds would be raised at the time of arguments.

ATTESTED

K. M. ANWAR  
Service Tribunal,  
Peshawar

It is, therefore, requested that on acceptance of this appeal, the impugned order 11/10/2012 may kindly be set aside and the seniority list issued by respondents by placing Appellant at Serial No.126 may kindly be declare as illegal, based on discrimination, in violation of law and the same may kindly be amended accordingly by considering the seniority of appellant in accordance with law and any other relief deemed proper by this Hon, able court may also be granted.

*[Signature]*  
APPELLANT

720W1V Through *[Signature]*  
KANWAR, KAMAL & SAWAR KHAN  
ADVOCATE HIGH COURT  
PESHAWAR

VERIFICATION/AFFIDAVIT

I do hereby solemnly affirms and declares on oath that all contents of this Appeal are true and correct and nothing has been concealed from this Hon, able court.

*[Signature]*  
DEPONENT.

Attested

Certified to be true copy  
*[Signature]*  
K. Ali Khan  
Notary Public  
Peshawar



Number of Application 4-12-2014  
Number of Pages 2000  
Copies For 12 or  
Urgent 2 or  
Total 14 or  
Name of Copyholder *[Signature]*  
Date of Completion of Copy 4-12-2014  
Date of Delivery of Copy 4-12-2014

Appeal No. 1217/2012

3.1.2014.

Appellant with counsel and Mr. Mr. Muhammad Adeel Butt, AAG with Wisal Muhammad, ADO for the respondents present. The learned counsel for the appellant submitted before the court that as per written reply of the respondents the name of the appellant has been placed at S.No. 29 in the seniority list of DM (M) District Charsadda as it stood on 01.7.2013. and due to his new seniority position, the appellant does not want to pursue the case further. He requested for withdrawal of the appeal. As such the appeal is dismissed as withdrawn. File be consigned to the record

ANNOUNCED

03.1.2014

sd/-  
MEMBER

Certified to be true copy  
E. S. SIDDIQI  
Judge  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 4-12-2014  
Number of Writs 800  
Copying Fee 6/-  
Legal 2/-  
Total 8/-  
Name of Counsel CM  
Date of Copy 4-12-2014  
Date of 4-12-2014

17102-1128525  
3/1/2014



## APPOINTMENT BY PROMOTION OR TRANSFER

7. **Appointment by Promotion or Transfer.**<sup>36</sup> (1) Except as otherwise provided in any service rules for the time being in force, appointment by promotion or transfer to posts in respect whereof the appointing authority under rule 4 is the Chief Minister shall ordinarily be made on the recommendation of the Provincial Selection Board and promotion and transfer to posts other than those falling within the purview of the Provincial Selection Board shall ordinarily be made on the recommendation of appropriate Departmental Promotion Committee".

(2) Appointment by transfer shall be made from amongst the persons holding appointment on regular basis in the same basic pay scale, in which the posts to be filled, exist.

(3) Persons possessing such qualifications and fulfilling such conditions as laid down for the purpose of promotion or transfer to a post shall be considered by the Departmental Promotion Committee or the Provincial Selection Board for promotion or transfer, as the case may be.

(4) No promotion on regular basis shall be made to posts in Basic Pay Scale 18 to 21 unless the officer concerned has completed such minimum length of service as may be specified from time to time.

~~8. **Inter-Provincial Transfer.** (1) Persons holding appointment in BPS-1 to 15 in Federal Government and other Provincial Government may, in deserving cases, be transferred to equivalent posts under these rules.~~

Provided that:-

- (i) the Federal Government or the Government of the Province concerned, as the case may be, has no objection to such a transfer;
- (ii) the person seeking transfer possesses the requisite qualification and experience and the post to which his transfer is intended can, under the rules, be filled by transfer;
- (iii) the person concerned holds appointment to the post in his parent Department on regular basis;
- (iv) the person concerned is a bona fide resident of the North-West Frontier Province.
- (v) a vacancy exists to accommodate the request for such a transfer; and
- (vi) Provided further that in most deserving cases, the merit of which shall be determined on case to case basis and the decision of the Competent Authority in that behalf shall be final, Government may allow transfer of a civil servant in BPS-16 and above, subject to the aforesaid conditions.

~~(2) A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-a-vis other members borne on the cadre.~~

(3) It will be the sole discretion of the appointing authority to accept or refuse a request for transfer under this rule and any decision made in this behalf shall be final and shall not be quoted as precedence in any other case.

9. **Appointment on Acting Charge or current Charge Basis.** (1) Where the appointing authority considered it to be in the public interest to fill a post reserved under the rules for departmental promotion and the most senior civil servant belonging to the cadre or service concerned, who is otherwise eligible for promotion, does not possess the specified length of service the authority may appoint him to that post on acting charge basis:

<sup>37</sup>Provided that no such appointment shall be made, if the prescribed length of service is short by more than <sup>38</sup>[three years].

(2) So long as a civil servant holds the acting charge appointment, a civil servant junior to him shall not be considered for regular promotion but may be appointed on acting charge basis to a higher post.

(3) In the case of a post in Basic Pay Scale 17 and above, reserved under the rules to be filled in by initial recruitment, where the appointing authority is satisfied that no suitable officer drawing pay in the basic scale in which the post exists is available in that category to fill the post and it is expedient to fill the post, it may appoint to that post on acting charge basis the most senior officer otherwise eligible for promotion in the organization, cadre or service, as the case may be, in excess of the promotion quota.

(4) Acting charge appointment shall be made against posts which are likely to fall vacant for period of six months or more. Against vacancies occurring for less than six months, current charge appointment may be made according to the orders issued from time to time.

(5) Appointment on acting charge basis shall be made on the recommendations of the Departmental Promotion Committee or the Provincial Selection Board, as the case may be.

(6) Acting charge appointment shall not confer any vested right for regular promotion to the post held on acting charge basis.

### PART-III

#### INITIAL APPOINTMENT

10. **Appointment by Initial Recruitment :-**(1) Initial appointment to posts <sup>39</sup>[in various basic pay scales] shall be made-

(a) if the post falls within the purview of the Commission, on the basis of Examination or test to be conducted by the Commission; or

<sup>37</sup> Full stop at the end of Rule 9 (1) replaced with colon and proviso added by Notification No. SOR-I (S&GAD)4-1/80/Vol-II, dated 20-10-1993.

<sup>38</sup> The words one year substituted by Notification No. SOR-I(S&GAD)4-1/80/III, dated 14.3.96.

<sup>39</sup> The words in basic pay scale-16 to 21 substituted by Notification No. SOR-I(S&GAD)I-117/91 (C), dated 12-10-1993

(1)

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

C.M Application \_\_\_\_\_/2021

In

Service Appeal No. 38/2019



Put up to the court with  
relevant appeal.

25/11/2021

Reader

**Bacha Khan (Certified Teacher)** (BPS-15), Government High School, Sur, Kamar,  
District Charsadda

**VS**

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat  
Peshawar Et. Al.

**CIVIL MISCELLANEOUS APPLICATION FOR AMENDING THE ABOVE SERVICE  
APPEAL TO THE EXTENT OF IMPUGNING THE APPELLATE ORDER  
DATED: 26/11/2018 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPLICANT  
WAS REJECTED BY THE RESPONDENTS NO. 05 WHICH IS ALREADY AVAILABLE AT  
PAGE NO. 40 OF THE MAIN SERVICE APPEAL BUT HAS INADVERTENTLY NOT  
BEEN IMPUGNED**

**The applicant is pleased to beseech before this Honorable Tribunal as under;**

1. That the Service Appeal No. 38/2019 is pending adjudication and is fixed for arguments on 24/03/2021.
2. That it is essential to submit that this application may please be considered as an integral part of the main service appeal.
3. That at the time of filing of the main service appeal, the Appellant Order Dated: 26/11/2018 whereby the Respondent No. 05 was pleased to reject the departmental appeal, has not been impugned inadvertently though the same is available as Page No. 40 of the Service appeal.
4. That this Honorable Tribunal was pleased to allow impugning the departmental rejection order vide its order sheet Dated: 06/01/2012.

**PRAYER:**

In light of the foregoing submissions, it is therefore, most convivially and humbly prayed that on acceptance of the instant application, the

rejection of the departmental appeal (Appellate Order) Dated: 26/11/2018 may also be considered as impugned for the just decision of the Service Appeal please.

Applicant

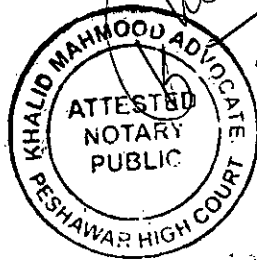
*[Handwritten signature]*

Through

(Mian Muhammad Imran)  
Advocate High Court

**AFFIDAVIT:**

I, Bacha Khan (CT) Government High School Sur Kamar, District Charsadda do hereby solemnly affirm and declare that the contents of the accompanied application are true and correct to the best of my knowledge and belief and nothing has been concealed.



*[Handwritten signature]*  
Deponent

3

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

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 38 /2018

Diary No. 17

Dated 4-1-2019

**Bacha Khan (Certified Teacher) (BPS-15), Government High School Sur Kamar,  
District Charsadda**

**VS**



1. Government of Khyber Pakhtunkhwa through Chief Secretary, Secretariat Peshawar
2. Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat Peshawar
3. Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education (E&S Edu), Civil Secretariat Peshawar
4. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
5. District Education Officer (Male) (DEO), District Charsadda

**SERVICE APPEAL UNDER SECTION 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE REJECTION OF THE DEPARTMENTAL APPEAL DATED: 26/11/2018 WHICH WAS PREFERRED IN RESPECT OF PROMOTION TO THE POST OF "SST" KEEPING IN VIEW THE FACT THAT THE APPELLANT HAS BEEN APPOINTED ON THE POST OF "CT" ON 15/12/1994 AND SO FAR, HAS NOT BEEN PROMOTED DESPITE THE LAPSE OF MORE THAN ABOUT 24 YEARS ON THE SAME**

06.01.2021

Counsel for the appellant and Asstt. A.G for the respondents present.

Learned counsel for the appellant requests for time to submit an amended appeal in order to also impugn the order of departmental appellate authority dated 26.11.2018.

The request is allowed. Amended appeal may be submitted within two weeks. To come up for reply/arguments on 24.03.2021 before the D.B.

**Certified to be true copy**

**EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar**

**(Atiq-ur-Rehman Wazir)  
Member(E)**

**Chairman**