

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4663

Dated 3/4/2023

Service Appeal No.550 OF 2022

1. Hidayat Ullah S/O Sharaf Uddin R/O Village Ghat Mulkhaw, P/O Mulkhaw, Tehsil Mulkhaw, District Chitral Upper currently serving at GHS Warijun, Chitral Upper.

(Appellant)

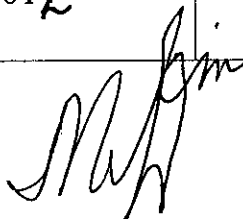
Versus

1. Government of KPK through Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. Secretary Elementary and secondary Education Government of Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
3. Director, Elementary and secondary Education Khyber Pakhtunkhwa Peshawar.
4. District Education Officer (M) Chitral Upper.

(Respondents)

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District Education Officer (M)
Chitral Upper
Respondent No.5

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
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1. Hidayat Ullah S/O Sharaf Uddin R/O Village Ghat Mulkhaw, P/O Mulkhaw, Tehsil Mulkhaw, District Chitral Upper currently serving at GHS Warijun, Chitral Upper. (Appellant)

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4. District Education Officer (M) Chitral Upper.

(Respondents)

REPLY ON BEHALF OF RESPONDENT No. 1 to 4.

Respectfully sheweth: -

PRELIMINARY OBJECTIONS

1. That the Appellant is not the "aggrieved" person with the meaning of Article 212 of the Constitution of the Islamic Republic of Pakistan 1973.
2. That the Appellant has got no cause of action /locus stand to file this Service Appeal because the Appellants did not come on merit.
3. That the Appellant has not come to this Honorable court with clean hands rather than the instant petition is mainly based on mollified intentions just to put pressure on the respondent department for illegal reinstatement.
4. That the Appellants are estopped by his own conduct.
6. That the instant Service Appeal suffers from laches, hence not maintainable in the present form.

7. That the appeal in hand is barred by the relevant provision of Law/Rules/Policy in Field.

ON FACTS

1. Para -1 of the facts pertains to residential and academic record, needs no comments.
2. Para -2 of the facts also pertains to the appellate academic record, needs no comments.
3. Para -3 of the facts pertains to record, hence need no comments.
4. Para-4 of the facts is pertaining to the promotion record from Theology to Senior Theology Teacher of the appellant, hence needs no comment.
5. Para -5 of the facts is correct up to extent that the appellant was recommended by respondents No,5 and his documents were forwarded, for promotion from S.A.T (BPS-16) to next cadre, SST (G) (BPS-16),and at the time of D.P.C, it was sought out to the respondent No.4, That in the total 11 vacant posts of SST (G) in district Chitral Upper, no share was available in 4% share for promotion from S.A.T to SST General, that's why the appellant was not considered for promotion , while those teachers who were eligible in other cadres , were promoted vide promotion order dated 29-10-2021.**(copy of the minutes showing details of vacant post quota wise is attached as "A", and Copy of the promotion order dated 21-10-2021 is attached as "B")**
6. Para 6 of the facts is incorrect, hence denied. And further stated that respondent No, 4 had always promoted legal and eligible candidate/ teachers to next cadre as per policy on the basis of seniority cum fitness, so far to the extent of the appellant, it is worth to mention here that there were 11 vacant posts of SST General (BPS-16), Out of which 25% were kept for initial recruitments, while 75% were reserved for promotion from different teaching cadres. Thus in 75 % quota, 4 % share is reserved for promotion from S.A.T


to SST General (BPS-16), and no any post was lying in the 4 % share, so the appellatant was not considered for promotion. **(Copy of the recruitments rules/Policy is attached as "C")**.

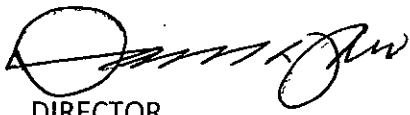
- 7. Para-7 of the facts is incorrect, hence denied. details have been submitted in the facts above.
- 8. Para-8 of the facts is also incorrect and miss leading hence denied.


GROUND

- A) In correct hence denied, the respondent always follows rules and policies in letter and spirit, as per policy no share in the vacant posts of SST General (BPS-16) was available, that's why the appellatant was not considered for promotion.
- B) Incorrect hence denied, details have been submitted in the facts above.
- C) Incorrect hence denied, details have been submitted in the facts above.
- D) Incorrect hence denied, details have been submitted above.
- E) Incorrect hence denied, and further stated that the instant service appeal is not maintainable, as no final order has been issued against the appellatant, nor junior to the appellatant has been promoted.
- F) Incorrect hence denied, detail reply has been submitted in the Facts above.
- G) Legal, However the official respondent also seeks permission for additional grounds during arguments.

It is therefore, humbly prayed that on acceptance of the above submission, the instant appeal may very graciously be dismissed in favor of the answering respondents with cost.


SECRETARY
GOVT: KHYBER PUKHTOON KHWA
ELEMENTRY AND SECONDARY DEPARTMENT
(Respondent No.1&2)


DIRECTOR
ELEMENTRY & SECODARY
EDUCATION KHYBER PAKHTOON KHWA
(Respondent No.3&4)


DISTRICT EDUCATION OFFICER (M)
CHITRAL UPER
(Respondent No.5)

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BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No.550 OF 2022

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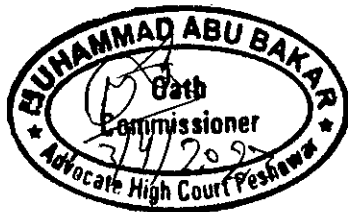
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4. District Education Officer (M) Chitral Upper.

(Respondents)

Affidavit

I, Rahmat Ali Khan, ADEO Establishment DEO (M) Chitral upper do hereby solemnly affirm and state on oath that the whole contents of this reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this August court.




Deponent
Rahmat Ali Khan

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AUTHORITY LETTER

Mr.Rahmat Ali, ADEO O/O THE DEO (M) Chitral Upper is hereby authorized to submit the comments /reply in the

Service Appeal No. 550 /2022.

Title: Hidayat Ullah v/s Govt etc On behalf of the undersigned.



District Education Officer Male
District Chitral Upper
Respondent No.5

Share of SPIT
Already Promoted
Available

TO WAS considered and the DPC
OFET (BPS-16) ON REGULAR BASIS

SAT TO SST (G)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE), UPPER CENTRAL							
ii. Promotion to SST (G)							
ITEM No.1, PROMOTION OF SAT (BPS-16) MALE TO THE POST OF SST (G) (BPS-16) ON REGULAR BASIS							
The case of Promotion of SAT BPS-16 to SST (G) BPS-16 was considered and the DPC decided as under:-							
Total No of Vacant Post of SST (G)	11						
25% Initial Recruitment Quota	2.75						
75% Promotion Quota	8.25						
40% CT/SCT Promotion Quota to SST (G)	4.4						
20% PST/SPST/PSHT Promotion Quota to SST (G)	2.2						
4% DM/SDM Promotion Quota to SST (G)	0.44						
4% AT/SAT Promotion Quota to SST (G)	0.44						
4% TI/STI Promotion Quota to SST (G)	0.44						
3% S.QARI Promotion Quota to SST (G)	0.33						
Already Promoted SAT to SST (G)	0						
Proposed for Promotion to SST (G)	11						
Sl No	Sen #	Name	Name of School	D/O Birth	Date of Appointment as regular AT	Academic & Professional Qualification	Remarks
1	10	Hidayatullah	GHS Warjun	11/11/1973	05/10/2004	MA Arabic B.Ed/S. Abma	Recommended

20	Not Elig
3	Not Elig
8	Not Elig
4	Not Elig
8	Not Elig
1	Not Elig
7	Not Elig
5	Not Elig
2	Not Elig
5	Not Elig
6	Not Elig
3	Not Elig
2	Not Elig
2	Not Elig
0	Not Elig
1	Not Elig
0	Not Elig
50	Not Elig
7	Not Elig
2	Not Elig
9	Not Elig
2	Not Elig
2	Not Elig
1	Not Elig
7	Not Elig
5	Not Elig
3	Not Elig

CERTIFICATE

- All the SAT (Male) have been included in the panel for the promotion to SST (G) posts.
- All the SAT (Male) hold the posts on regular basis and non of them is holding the post on adhoc/acting charge basis/contract.
- All the SAT (Male) have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of SSTs under the rules.
- Non of them is on deputation to any organization under the Autonomous/Semi federal/provincial/autonomous/ International organization.
- Neither any disciplinary/departmental proceedings/Anti corruption/ Judicial enquiry is pending against them nor has any penalty been imposed upon any of them during the last five years.
- Non of them is on long leave/Ex Pakistan leave.

[Signature]
21/9/21

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Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E)/2010 dated 16.7.2012, the following CT/SCT and PS/IT/SPST/PST (Male) are promoted to the posts of SST (General), SST (Bio/Chem) and SST (Maths/Phy) in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A. SST (General)

ITEM NO.4:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	11
25% Initial Recruitment Quota	2.75
75% by Promotion Quota	8.25
40% CT/SCT Promotion quota to SST(G)	4.4
Proposed CT/SCT for Promotion to SST(G)	4

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	11	Zar Barat Khan	GISS Shagram	20/4/1965	06/12/2014	MA/M Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	12	Mir Wazir Khan	GHS Booni	01/09/1964	06/12/2014	MA/B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	14	Khowaja Khizer Khan	GIIS Shongush	10/02/1971	06/12/2014	MA/M.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	15	Mirza Nadir Shah	GHS Rech	02/03/1968	22/07/2015	MA/M.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

Promotion of SST of District Upper Chitral

ITEM NO.2:- PROMOTION OF PST/SPST/PSHT TO SST (G) BPS-16 ON REGULAR BASIS

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Total No. of Vacant Post of SST (G)	11
25% Initial Recruitment Quota	2.75
75% by Promotion Quota	8.25
20% PST/SPST/PSHT to SST (G)	2.2
Proposed PST/SPST/PSHT for Promotion to SST (G)	2

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	32	Akbar Azim Shah	GPS Parvak Bala	02/12/1969	26/12/2012	BA/ B.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	34	Miqdar Ali Khan	GPS Brep-02	12/01/1963	26/12/2012	BA/ B.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

B. SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF SCT/CT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST (Bio/Chem)	5
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
40% CT/SCT Promotion quota to SST (Bio/Chem)	2
Proposed CT/SCT for Promotion to SST (Bio/Chem)	2

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	124	Ijaz Ahmed	GMS Nichagh Owir	17/04/1991	09/03/2016	Msc/B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
2.	131	Ijlal Uddin	GMS Rayeen	02/03/1986	09/03/2016	Msc/B.Ed	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PSHT/SPST/PST to SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST (Bio/Chem)	5
25% Initial Recruitment Quota	1.25
75% by Promotion Quota	3.75
20% PST/SPST/PSHT to SST (Bio/Chem)	1
Proposed PST/SPST/PSHT for Promotion to SST (Bio/Chem)	1

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Promotion of SST of District Upper Chitral

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	218	Fazle Muabood	GPS Ruyeen Bala	06/02/1988	06/06/2014	MSc/ B.Ed:	Services are placed at the disposal of D.E.O (M) Upper Chitral for adjustment against the post of SST (Bio'Chem) BPS-16 on regular basis with immediate effect.

C. SST (Maths/Phy)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	6
25% Initial Recruitment Quota	1.5
75% by Promotion Quota	4.5
40% CT/SCT Promotion quota to SST(Maths/Phy)	2.4
Proposed CT/SCT for Promotion to SST(Maths/Phy)	2

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	125	Naveed Akhtar	GHIS Kushum	22/06/1989	09/03/2016	BS Math/B.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2.	126	Nasir Ahmad	GMS Nishku	20/04/1990	09/03/2016	Msc/M.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PST/PSHT/SPST to SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Maths/Phy)	6
25% Initial Recruitment Quota	1.5
75% by Promotion Quota	4.5
20% PST/SPST/PSHT to SST(Maths/Phy)	1.2
Proposed PST/SPST/PSHT for Promotion to SST(Maths/Phy)	1

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1	221	Sohrab Iqbal	GPS Booni Gole	12/01/91	06/06/14	BSc/ B.Ed:	Services are placed at the disposal of DEO (M) Upper Chitral for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

Terms and Conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.

(11)

Promotion of SST of District Upper Chitral

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- Their Inter-Se- seniority on lower post will remain intact.
No TA/DA is allowed for joining the duty.
They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in light this order, will be recovered and if they are wrongly promoted, they will be reversed.
Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 5013-18/ File No.5/Promotion of SST (BPS-16) Dated Peshawar the 29-10-2021

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Upper Chitral.
3. District Accounts Officer Upper Chitral.
4. Officials Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

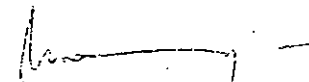


GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PED-5/BSRC/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.

Copy forwarded to:-

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

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 FATA.
15. All Agency Education Officers FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.


Section Officer (Primary)

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).

	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 (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.

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 Tanzimatuul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatuul 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.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. Note: In case of non-availability of suitable candidates, recruitment may be made by initial recruitment.
12.	Senior Qari (BPS-15).			fitness, from amongst Q. Is, 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

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).

Note: In case of non availability of suitable person for promotion, then by initial recruitment

14.

Certified Teacher (DPS-15).

University degree in relevant technical subjects from Government College or Vocational Institute of Engineering

(b) Bachelor's Degree from a recognized

sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher

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

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		<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).</p>		<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>16.</p>	<p>Certified Teacher (Home Economics) (BPS-15).</p>	<p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center; or</p> <p>(ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree;</p> <p>(iii) Bachelor's Degree with Home Economics from a recognized University with in service training from Government Agro Technical Teacher Training Center; or</p> <p>(iv) Bachelor's Degree, from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics).</p> <p>(c) promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p>

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		University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).		Certified Teacher (Home Economics). <u>Note:</u> 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 by initial recruitment. <u>Note:</u> In case of non availability of suitable candidate for promotion, then by initial recruitment.

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>Note: In case of ...</p>
29.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

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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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SCHEDULE

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

Arabic Teacher

<u>Educational Qualification</u>	<u>Total Marks: 100</u>
SSC	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
M.A Arabic / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris	Marks obtained X 20 / total marks = ____
Other MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

Theology Teacher

MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
M.A Islamiat / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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Qari/Qaria

<i>Category of Qualification</i>	<i>Total Marks 100</i>
SSC	<i>Marks obtained X 20 / total marks = ____</i>
<i>Qirt Sanad from a recognized Institution.</i>	<i>Marks obtained X 20 / total marks = ____</i>
HSSC	<i>Marks obtained X 20 / total marks = ____</i>
BA/BSc	<i>Marks obtained X 20 / total marks = ____</i>
MA/MSc/ M.Ed / MA Edu	<i>Marks obtained X 15 / total marks = ____</i>
MPhil/PhD	<i>Marks = 05</i>

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

<i>CT Certificate / M.A.E.</i>	
MA/MSc/M.Ed / MA Edu	<i>Marks obtained X 15 / total marks = ____</i>
MPhil/PhD	<i>Marks = 05</i>

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Drawing Master

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

Physical Education Teacher

<i>Category of Qualifi</i>		
<i>MA/MSc/M.Ed / MA</i>		
<i>MPhil/PhD</i>	<i>Marks = 05</i>	

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Primary School Teacher

<i>Category of Qualification</i>	<i>Total Marks 100 For Humanities group at Intermediate Level</i>	<i>For Candidate of Science group</i>
<i>SSC</i>	<i>Marks obtained X 20 / total marks = ____</i>	<i>5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection</i>
<i>HSSC</i>	<i>Marks obtained X 10 / total marks = ____</i>	
<i>BA/BSc</i>	<i>Marks obtained X 25 / total marks = ____</i>	
<i>PST Certificate/ Diploma in Education / A.D.E.</i>	<i>Marks obtained X 20 / total marks = ____</i>	
<i>MA/MSc/M.Ed / MA Edu</i>	<i>Marks obtained X 20 / total marks = ____</i>	
<i>MPhil/PhD</i>	<i>Marks = 05</i>	

Other conditions:-

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

NOTIFICATION

Peshawar, dated the 07.03.2018.

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

AMENDMENTS

In the Appendix,-

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

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

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

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

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<p>(b) Physics, Maths or Statistics; (c) Humanities and other equivalent groups at degree level with English as subject; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).</p>	
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against Serial No. 10, in columns No.3 and 4. for the existing entries, the following shall be substituted, namely:

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

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

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

(v)

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

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

(vi)

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

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

(vii)

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

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

Handwritten signature or initials.

(viii)

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

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

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

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

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

Endst: of even No & date:

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


SECTION OFFICER (General)