

23.02.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 09.06.2021.


Reader

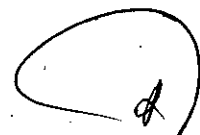
09.06.2021

Junior to counsel for the appellant present. He states that learned senior counsel is indisposed today and requests for adjournment. Adjourned to 15.09.2021 for preliminary hearing before S.B.


Chairman

15.09.2021

Appellant present through counsel who requested for a short adjournment in order to produce the promotion order; allowed. To come up on 23/09/2021 for hearing before S.B




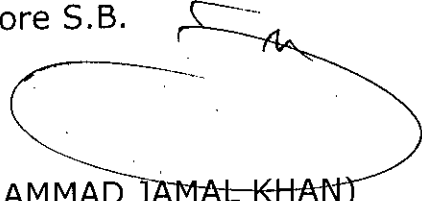

(Rozina Rehman)
Member (J)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 9149 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/08/2020	<p>The appeal resubmitted today by Mr. Muhammad Farooq Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/09/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>28.09.2020</p> <p>Counsel for the appellant present. Requests for further time to prepare the brief. Adjourned to 25.11.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p> <p>25.11.2020</p> <p>Mr. Muhammad Farooq, Advocate, for appellant is present. He has not prepared the brief and is seeking time for its preparation. Adjourned to 23.02.2021 on which date file to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)</p>


SCANNED
KTS
Peshawar

The appeal of Mr. Amir Muhammad SST GHSS cantt. No.2 Nowshera received today i.e. on 06.07.2020 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be attested.
- 4- Annexures of the appeal may be flagged.
- 5- Approved file cover is not used.
- ⑥ Copy of notification mentioned in para-2 of the memo of appeal (Annexure-A) is not attached with the appeal which may be placed on it.
- ⑦ Copies of detail list and advertisement mentioned in para-4 of the memo of appeal (Annexure-C) are not attached with the appeal which may be placed on it.
- ⑧ Copy of writ petition in respect of appellant and order passed by the Hon'ble Peshawar High Court mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 9- Copies of appointment orders of others employee mentioned in para-6 of the memo of appeal are not attached with the appeal which may be placed on it.
- ⑩ Copy of impugned order and departmental appeal against it are not attached with the appeal which may be placed on it.
- 11- Wakalat nama in favour of appellant be placed on it.
- 12- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1382 /S.T,


Dt. 07-07 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Farooq Khan Adv. Nowshera

Objections nos 6, 7, 8 and 10 are still stands moreover all the annexures of the appeal are illegible, therefore the same is returned to the counsel for the appellants for completion and resubmission within 15 days.

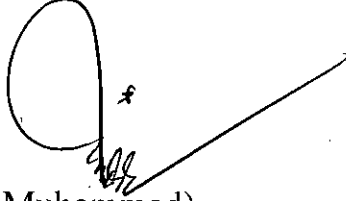
No. 1933 /S.T
dt. 28/7 /2020


Registrar

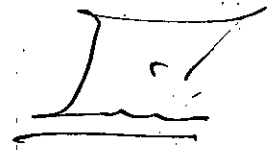
04.01.2023

Mr. Taimur Ali Khan, Advocate present and submitted Wakalatnama in favor of the appellant. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has been newly engaged in the instant appeal and has not gone through the brief. Adjourned. To come up for arguments on 05.04.2023 before D.B.



(Mian Muhammad)
Member (E)



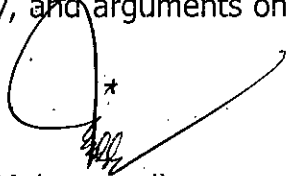
(Salah-ud-Din)
Member (J)

SCANNED
KP ST
Peshawar

31.08.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Tufail, Assistant for the respondents present.

Reply/comments on behalf of respondents submitted through office which are placed on file. Copy of the same is handed over to the appellant. Adjourned. To come up for rejoinder, if any, and arguments on 07.11.2022 before D.B.


(Mian Muhammad)
Member (E)


07.11.2022

Counsel for the appellant present.

Asif Masaud Ali Shah learned Deputy District Attorney for the respondents present.

Former made a request for adjournment on the ground that he has not prepared the brief. Muharrir of the court is directed to properly place on file the comments submitted by the respondents. Adjourned. To come up for arguments on 04.01.2023 before D.B.

SCANNED
KPST
Peshawar

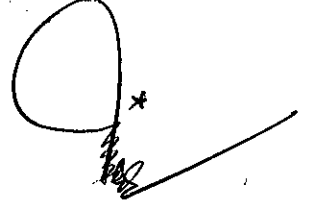

(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

31.03.2022

None for the appellant present. Mr. Muhammad Adeel Butt,
Addl: AG alongwith Mr. Masood Khan, Litigation Officer DEO(M)
Nowshera for respondents present.

Written reply/comments on behalf of respondents not
submitted. Representative of the respondents seek time to submit
the same on the next date. Adjourned. To come up for written
reply/comments on 17.06.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER(E)

17th June 2022

Counsel for the appellant present. Mr. Kabirullah
Khattak, Addl. AG alongwith Asif Khan, Assistant for the
respondents present.

Despite three opportunities given to the respondents,
they have not submitted reply. The respondents are given last
opportunity to submit reply within 07 days from today, failing
which their right to file reply shall be deemed as struck off by
virtue of this order. To come up for arguments before the D.B
on 31.08.2022. The case will not be adjourned on the ground of
non-filing of reply/comments



(Kalim Arshad Khan)
Chairman


23.09.2021

Counsel for the appellant present. Preliminary arguments heard. Record perused.


Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 31.01.2022 before D.B.


(Rozina Rehman)
Member (J)

31.01.2022


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

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General sought time for submission of reply/comments. Granted. To come up for reply/comments before the S.B on 31.03.2022.


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

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR.

Service Appeal No. 9149/2020

Amir Muhammad.....Appellant

Versus

Secretary to Govt of K.P. E&S Department and others Respondents

I N D E X

S.No.	Description of documents.		Pages.
1)	Memo of appeal with affidavit.		1-6
2)	Addresses of the parties.		7
3)	Copy of notification.	A	8-14
4)	Copy of detailed list showing the school wise vacancies and advertisement.	B-C	15-26
5)	Copy of writ petition and order	D	27-30
6)	Copies of educational documents.	E	31-34
7)	Copies of applications.		35
8)	Wakalatnama.		36

Amir Muhammad
Appellant

Through

[Signature]
Muhammad Farooq Khan
Advocate High Court
District Courts Nowshera

Dated: 60.07.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR.

Service Appeal No. _____/2020

Amir Muhammad son of Adil Muhammad
R/o Aza Khel Payan, Nowshera
Presently working and posted as Secondary School Teacher (SST) at Govt.
Higher Secondary School Cantt No.2, (Nowshera).....Appellant
-----Versus

- 1) Secretary to Government of Khyber Pakhtunkhwa Elementary and
Secondary Education Department, Civil Secretariat, Peshawar.
- 2) Director Elementary & Secondary Education Department, KPK,
Peshawar.
- 3) District Education Officer (Male) Nowshera..... Respondents

**APPEAL U/S 4 OF THE SERVICES
TRIBUNAL ACT, 1974.**

Respectfully Sheweth;

- 1) That the appellant had joined the services in education department
and promoted to the post of Secondary School Teacher (SST) and
lastly was posted as such.
- 2) That the respondent department in consultation with the
Establishment and Finance Department has passed notification
No.SO(PE)4-5/SSRC/Meeting/2013 Teaching Cadre dated Peshawar
the 24th July, 2014 whereby 75% quota for the posts of Secondary
School Teacher (BPS-16) has been reserved/ sanctioned for
promotion on the basis of seniority-cum-fitness and 25% for initial
recruitment. (Copy of notification is Annexure "A").

- 3) That the appellant being Senior Primary School Teacher (SPST-BPS-14) is standing at the top of seniority list having spotless service career and was highly eligible and most deserving teacher for his due legitimate right of promotion as Secondary School Teacher (BPS-16).
- 4) That there was confirmed vacancies for 62 post of senior science teacher (BPS-16) and accordingly an advertisement was floated in the daily newspaper, wherein applications for fresh recruitment were invited from the suitable candidates/ citizens of the KPK province and the cut date of submission of applications was given as 30.09.2016. (Copy of the detailed list showing the school-wise vacancies and advertisement for recruitment are Annexure "B and C" respectively).
- 5) That the advertisement (Annexure "C") if seen at a glance, it transpires that the whole number of vacancies are/ were to be filled through initial recruitment and not a single vacancy was kept for promotion amongst the senior certified teachers or senior primary school teachers.
- 6) That now against said impugned appointment appellant filed a W.P.No.1495-P/2017 in which Hon'ble High Court directed the appellant to approach proper forum. (Copy of writ petition along with order is annexed as "D").
- 7) That now in 2019 the appellant has been promoted, but not from 2016 as the appellant was eligible for the said promotion according to policy and rules.
- 8) That due to the illegal act the appellant become junior to the promoted and fresh appointed teachers in 2016 and also deprived from the financial rights.

9) That feeling aggrieved, the appellants in the given circumstances while having no other adequate remedy is constrained to approach this Hon'ble Tribunal for the redressal of his grievances on the following grounds inter alia;

GROUND:

- A) That notification (Annexure "A") is the clear cut and well transparent policy being mandatory in nature, properly formulated and promulgated by the respondents themselves and as such the respondents are/ were under their obligatory duty to act upon their own policy and the whole number of 62 vacancies should have been filled accordingly wherein 75% quota is/ was the legal rights of incumbents/ serving employees on the basis of seniority-cum-fitness and the rest of 25% quota was to be determined for fresh/ initial recruitment. The respondents purposely and illegally have amalgamated all the sets of quotas just to accommodate their own kit and kin/ blue eyed and the appellant was made scapegoat.
- B) That discrimination in services as observed by the respondents in the matter of depriving the appellant from his due/ legal right of promotion is highly deplorable and condemnable, being unlawful, unconstitutional, without lawful authority, without jurisdiction, against the norms and natural justice and equity hence to be declared as such.
- C) That in 2016 appellant having the prescribed qualification for promotion as per policy and rules of respondents.
- D) That it is constitutional right of the appellant to be promoted and Science Teacher were deprived
- E) That in the General D.P.C. in 31.01.2017 that Arts Teachers were promoted and Science Teachers were deprived.

- 5
- F) That the appellant being deserving and eligible candidate for his due promotion to the post of Secondary School Teacher (BPS-16) while no adverse remarks whatsoever has ever been assigned to him from any quarter and thus valuable rights have been accrued to him and such rights could not be taken away in an arbitrary and fanciful manner.
- G) That the appellant has not been dealt with in accordance with law and has illegally been put to, financial trouble and hardship in the prevailing circumstances of dearness, scarcity and uncertainty promotion policy, shall be deemed to have been promoted to the post of Secondary School Teacher (BPS-16) retrospectively being legally entitled as such.
- H) That there is sheer discrimination in the matter of promotion of the appellant to the post of Secondary School Teacher (BPS-16) and the respondents have acted according to his own sweet will, whims, wishes, discretion and innovation.
- I) That the appellant has not been dealt with in accordance with law and equity and the appellant has been made as scapegoat who has been penalized for no fault on his part.
- J) That the respondents have exceeded their powers and jurisdiction by enjoying their own innovation and monopoly, creating problems for the entire family of the appellant, by giving him discriminative treatment which amounts to deprive the family of the appellant including his school going children from their breathing and livelihood which is unwarranted by the law of the land.
- K) That valuable right was accrued to the appellant whereas their fundamental valuable rights have been encroached by the respondents on their personal whims and wishes and such

encroachment is hit by the command of the Constitution of the Islamic Republic of Pakistan, 1973.

- L) That the respondents have transgressed their powers and the appellant has been denied his due fundamental rights of being treated fairly, and equally in accordance with law whereas the appellant is/ was highly, legally eligible on the basis of seniority-cum-fitness and that too there are sufficient sanctioned vacant posts are/ were available and thus valuable rights have been accrued to the appellant which have taken legal effect and such legal rights could not be taken away with a single stroke of pen.
- M) That Islamic State is under obligation to establish a society which is free from exploitation wherein social and economic justice is guaranteed to its citizens. (2005 SCMR 100 (c & d).
- N) That further submissions will be advanced with the kind permission of this august court at the time of hearing the appeal at the bar.

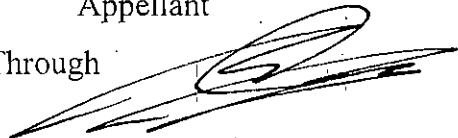
It view of above facts, it is, therefore, humbly prayed that on acceptance of this appeal, appellant may please be promoted from the year 2016 with all financial back benefits and seniority enabling the appellant to enjoy the protection of law and to be treated in accordance with law, just to meet the ends of justice.

Any other remedy if available may also be extended in favour of appellant to meet the ends of justice.

Ammar Muhammad

Appellant

Through



Muhammad Farooq Khan
Advocate High Court
District Courts Nowshera.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR.

Service Appeal No. _____/2020

Amir Muhammad.....Appellant

Versus

Secretary to Govt of K.P. E&S Department and others Respondents

AFFIDAVIT

I, Amir Muhammad son of Adil Muhammad R/o Aza Khel Payan, Nowshera Presently working and posted as Secondary School Teacher (SST) at Govt. Higher Secondary School Cantt No.2, (Nowshera) do hereby affirm and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Amir Muhammad

Deponent



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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Service Appeal No. _____/2020

Amir Muhammad.....Appellant
Versus

Secretary to Govt of K.P. E&S Department and others Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Amir Muhammad son of Adil Muhammad
R/o Aza Khel Payan, Nowshera
Presently working and posted as Secondary School Teacher (SST) at Govt.
Higher Secondary School Cantt No.2, (Nowshera)

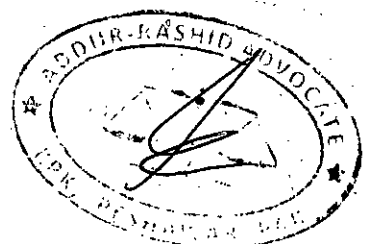
RESPONDENTS:

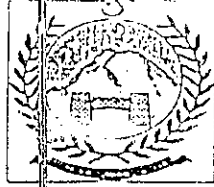
- 1) Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department, Civil Secretariat, Peshawar.
- 2) Director Elementary & Secondary Education Department, KPK, Peshawar.
- 3) District Education Officer (Male) Nowshera

Appellant *Amir Muhammad*

Through

Muhammad Farooq Khan
Muhammad Farooq Khan
Advocate High Court
District Courts Nowshera.





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No. SO(PE)4-5/SSRC/Meeting/2013/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, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&L/D/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and 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) Serial No. 1 shall be renumbered as 1a and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
-1.	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16); with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

ATTESTED

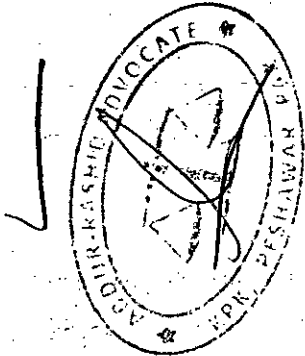
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1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	recruitment, and (b) fifty percent by initial recruit (a) Fifty percent by promotion, on seniority-cum-fitness, from among Physical Education Teachers (at least five years service as Secondary Education Teacher and Physical Education Teacher and having mentioned in column No. 3: Provided that if no suitable candidate is available from amongst Secondary Education Teachers for promotion, the post shall be filled by promotion on basis of seniority-cum-fitness amongst the Physical Education Teachers with at least five years service having qualification mentioned in column No. 3: Note:- If no suitable candidate is available in the relevant cadres of the post, the post falling in their grade shall be filled by initial recruitment. (b) fifty percent by initial recruit
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(ii) against Serial No. 1B, as so numbered, for the existing entries, the following shall be substituted, in respective namely:

1	2	3	4	5
1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>Seventy Five per cent by promotion basis of seniority-cum-fitness, from district concerned in the following</p> <p>(a) forty per cent from amongst the Certified Teachers (BPS-16), with five years service as Senior Teacher and Certified Teacher having qualification mentioned in column No.3:</p> <p>Provided that if no candidate is available from Senior Certified Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teachers at least five years service as : having qualification mentioned in column No.3;</p> <p>(b) four per cent from amongst the Drawing Masters (BPS-16), with five years service as Senior Masters and Drawing Masters having qualification mentioned in column No.3:</p>

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

DELETED

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

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

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

APPROVED

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

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

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

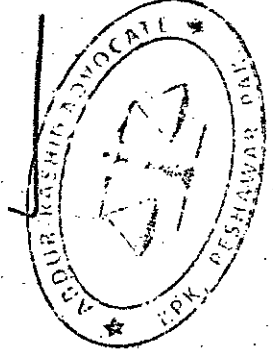
- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;

Provided that if no suitable candidate is available from amongst

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				<p>Primary School Head Teachers promotion then the post shall be filled promotion, on the basis of seniority-cum fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned column No. 3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as Senior Primary School Teachers and having qualification mentioned column No. 3; and</p> <p>(ii) twenty five percent by initial recruitment.</p> <p>Note:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on a need basis separately.</p>
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/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, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)SSL/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and 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) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

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SST Maths Phy

NTS Over

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail rafiq_kk851@yahoo.com

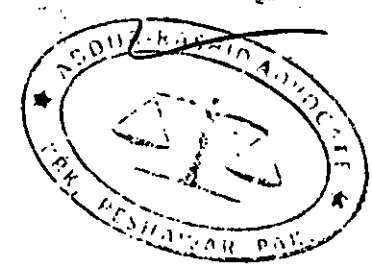


APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem). (SST Maths Phy), (SST General) School based in BPS-16 (rs. 15880-1280-54280) @ Rs. 15880/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:

(SST Bio Chem)

Roll No	Name	Father Name	Permanent Address	Academic Marks (out of 100)	NTS Marks (out of 100)	Total Marks (Out of 200)	School
571000265	Zahir Ali	Amir Zaman Khan	Civil Bazar Risal Pur Cantt District And Tehsile Nowshera CNIC No.17201-5704473-3	64.44	75	139.44	GHS Zanda Banda
601001003	Abdul Rahim Khan	Abdul Hassan	C/O Teriq General Store Near Bilal Masjid Street Bilal Lane Arbab Road University City Town Peshawar CNIC No.17201-1562500-1	67.03	69	136.03	GHS Dag Besud
573001557	Manzoor Hussain	Biladar Khan	Village Gulistan Korona Mohallah Mandoori Khesgi Bala Post Office Khesgi Payan, District Nowshera CNIC No.17201-3990071-1	67.08	66	133.08	GHS Kotar Pan
521000201	Noman Zaidi	Shaukat Ali	Vill Khudrizai Muhallah Semandar Garhi Teh Pabbi Distt Nowshera CNIC No.17201-5575446-1	69.98	61	130.98	GHS Wazir Ghani
111000747	Jehanzeb Ali Shah	Muzahid Gul	Mohallah Daulau Sharif Village And Post Office Zalat Kaka Sahib Nowshera CNIC No.17201-8115146-5	62.29	68	130.29	GHS Misa Banda
521000201	Muqaz Ali Qazi	Fahad Niaz	Village Post Office Pabbi Mohallah Khan Sher Garhi Near Speen Junat Tehsil Pabbi CNIC No.17201-9507958-5	73.16	57	130.16	GHS Pabbi
601001205	Karwan Ullah	Taufiq Gul	Mohallah Ahmad Khal Village & P/O Kahi Nizampur Nowshera CNIC No.17201-7280556-9	74.77	55	129.77	GHS Damanaal
521000201	Iltaf Hussain	Manzoor Hussain	Moh Mian Bahdur Shah Village Amankot Post Office Pabbi Tehsil Pabbi District Nowshera	60.57	69	129.57	GHS Mall Kheil



(Policy)

76

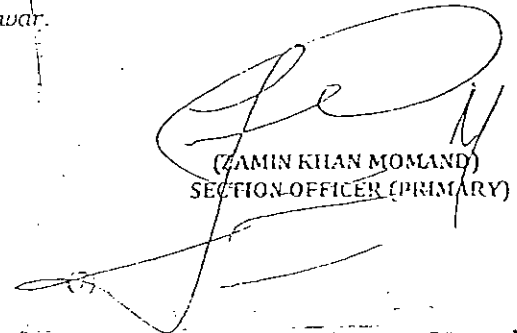
SECRETARY TO GOVERNMENT OF KHYBER PAKHTUN
ELEMENTARY & SECONDARY EDUCATION DEPART

Endst : of even No & date:

(14)

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

ATTESTED


(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

ADP VICE
SST (SC)



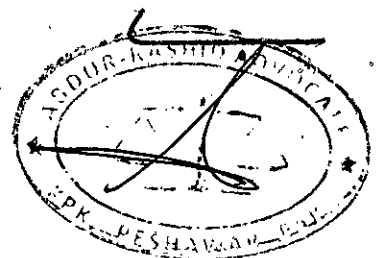
(B) OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA

☎ 0923-9220228 ☎ 0923-9220228 ✉ emisnowshehra@yahoo.com

POSTING ORDER

In pursuance of the revised Notification issued by the Directorate of Elementary Secondary Education, Khyber Pakhtunkhwa Peshawar vide Endst: No. 6077-83/File No. 2 Promotion SST B-16 date Peshawar the 31/01/2017 and in supersession of the posting order and subsequent corrigendum issued by this office in this regard, the postings of the following newly promoted SST (General) BPS-16 (Rs.15880-1280-54280) are hereby ordered in the schools noted against each, on the terms and conditions given below in the interest of public service with immediate effect.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
A. SST (General)					
1. Promotion of Sr. CT / CT to SST (General) BPS-16					
01	104	Muhammad Abid SCT	GHSS, Khair Abad	GHSS Khair Abad	A.V.P.
02	144	Wazir Khan SCT	GHS, Mali Khel Bala	GCMHS, Akora Khattak	A.V.P.
03	145	Shahid Hussain SCT	GHS, Banda Sheikh Ismail	GHS, Zakhi Qabristan.	A.V.P.
04	146	Hamid Gul SCT	GHS, Spin Khak	GHS, Bakhtai	A.V.P.
05	147	Haj Waii SCT	GHS, Pahari Kati Khel	GHS, Pahari Kati Khel	A.V.P.
06	148	Sher Khan Khattak SCT	GHS, No.1 NSR Cantt.	GHS, No.1 NSR Cantt.	A.V.P.
07	150	Zulfiqar Khan SCT	GHS, Dheri Kati Khel.	GHSS, NSR Kalan	A.V.P.
08	153	Qadri Baz SCT	GHS, Jabba Khushk	GHS Palosi Payan.	A.V.P.
2. Promotion of Sr. DM / DM to SST (General) BPS-16					
01	22	Shah Umar SDM	GHSS, Shaidu	GHSS, Khair Abad	A.V.P.
3. Promotion of Sr. AT / AT to SST (General) BPS-16					
01	21	Faqeer Shah	GHSS, Shaidu	GCMHS, Akora Khattak	A.V.P.
4. Promotion of Sr. TT / TT to SST (General) BPS-16					
01	03	Subhan Ud Din STT	GHS, No.2 NSR Kalan	GHSS, NSR Kalan.	A.V.P.
5. Promotion of Sr. Qari / Qari to SST (General) BPS-16					
01	06	Muhammad Sanadi Sr. Qari	GHS, No.1 NSR Cantt.	GHS, Zando Banda.	A.V.P.
Consequent Transfer					
01		Masood Khan SST (G)	GHS, Palosi Payan	GMS, Maken Abad	A.V.P.
02		Muhammad Tariq SST (G)	GHSS, Risalpur	GHS, Badrashi.	A.V.P.
03		Ajmal Mumtaz SST (G)	GHS, Wattar.	GCMHS, Akora Khattak	Working again wrong post.
04		Muhammad Israr SST (G)	GMS, Gul Dheri	GMS, Aziz Abad	A.V.P.
05		Shakeel Ur Rehman SST (G)	GMS, Turlandi	GMS, Guldheri	Against S.No. 0



Promotion of SGT/SDM/SAT/SAT/Sr.Qari/ to SST (BPS-16)

06	Fazali Wahab SST (G)	GHS, Marhati Banda	GMS, Turlandi	Against S.N.
07	Naseem Ullah Jan SST (G)	GHS, Amangarh	Gov; Shaheed Ali Abbas High School Dagbesud	A.F.P

Terms & Conditions:

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period; in case of misconduct, they shall be proceeded under the rules framed from time to time.
4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
5. The Principals / Head Masters / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
7. The District Education Officer (Male), Nowshera will issue Clearance Certificate after the verification process.
8. Charge Report should be submitted to all concerned. However, those candidates who have already submitted their charge reports as a result of the previous posting order / corrigendum, do not need fresh charge report.
9. Their Inter-Se Seniority on lower post will remain intact.
10. No TA / DA is allowed for joining their new post.
11. They will give an undertaking to be recorded in their Service Books / File to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted him shall be reversed.

(Fayaz Hussain)
District Education Office-(Male)
Nowshera

Endst: No. 4951-62/DEO-(M) NSR/EA-S/Prom: of SSTs. Dated Nowshera the, 08/02/2017.
Copy of the above is forwarded for information to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
2. District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Nowshera.
4. District Monitoring Officer (IMU) Nowshera.
5. Sub Divisional Education Officer (Male), Nowshera.
6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
7. Superintendent - Establishment (Primary & Secondary), Local office.
8. Dealing Assistant - Establishment (Primary & Secondary), Local office
9. Assistant Programmer D-EMIS, local office.
10. Accountant, Local office.
11. Officers concerned.
12. Master File.

District Education Officers (Male)
Nowshera

[Deprive]
Science T



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs, SDMs/DMs, SAs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 12910-1035-43960) 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 effect from the date of their taking over charge and further they will be posted by the District Education Officer concerned.

A. SST (Phy-Maths)

1. PROMOTION OF PSHT/SPST/PST TO SST (Phy-Maths) BPS-16

Total No. vacant posts of SST (Phy-Maths)	04
25% share initial recruitment	0
75% share for Promotion.	04
20 % Share of promotion of PSHT/SPST/PST	04
Posts available for promotion	04
Promoted through this order	04

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt: As Regular Pst	Qualification	Remarks
1	1043	Zainullah Khan	GPS No.5 Dag Behsud	12/12/1974	24/6/1997	BSc/B.Ed	Services placed at the disposal of DEO (M) Nowshehra for further posting against SST (Phy-Maths) post.
	1047	Amir Muhammad	GPS No.1 Azakhel Payan	1/1/1968	28/6/1997	BSc/B.Ed	-----do-----
3	1050	Asif Khan	GPS Amankot	1/5/1973	30/6/1997	BSc/B.Ed	-----do-----
4	1092	Riaz Muhammad	GPS Ali Shah	1/4/1975	24/4/1998	BSc/B.Ed	-----do-----

Terms and conditions:-

- 1 He would be on probation for a period of one year extendable for another one year.
- 2 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 His services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 His Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 He will give an under taking to be recorded in his service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
- 8 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Before handing over charge once again their document may be checked if he has not the required relevant qualifications as per rules, he may not be handed over charge of the post.

(Farid Ahmad Khattak)

Director

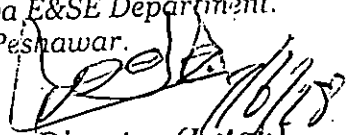
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

1742-47

Endst: No. / File No.2/Promotion SST B-16: Dated Nowshera the 8/6/2018.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Nowshera.
2. District Education Officer (Male) Nowshera.
3. District Accounts Officer Nowshera.
4. Official 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.


Dy: Director (I-stab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



201

NTS 2017
25/

DISTRICT NOWSHERA (Male)

District Cadre SST Posts 2017-2018

S.N o.	District Name	School Codes	Name of School.	SST-Sc:	SST-Sc:Math/Phy: BPS-16	SST-Arts. B-16	Total.
				Bio/Chem: BPS-16	M	M	
1	Nowshera	291601	GHS ASC Colony ✓	1	1	1	3
2	Nowshera	291602	GHS Badrashi			1	1
3	Nowshera	291603	GHS.Bakhtai ✓	1	1		2
4	Nowshera	291604	GHS Camp Koroona	1		1	2
5	Nowshera	291605	GHS Dheri Kati Khel			1	1
6	Nowshera	291606	GHS Garu			1	1
7	Nowshera	291607	GHS Inzari			1	1
8	Nowshera	291608	GHS Kana Khel ✓	1	1	1	3
9	Nowshera	291609	GHS Kotar Pan			1	1
10	Nowshera	291610	GHS Kotli Saleh Khana			2 ✓	2
11	Nowshera	291611	GHS Marhati Banda			1	1
12	Nowshera	291612	GHS Maroba			1	1
13	Nowshera	291613	GHS Mian Essa ✓		1		1
14	Nowshera	291614	GHS Mughalki	1		1	2
15	Nowshera	291615	GHS No2 Kalan			1	1
16	Nowshera	291616	GHS Pahari Katti Khel	1			1
17	Nowshera	291617	GHS Palosi Pavan			1	1
18	Nowshera	291618	GHS Saadat Abad ✓	1	1	1	3
19	Nowshera	291619	GHS Sadiq Abad ✓	1	1	1	3
20	Nowshera	291620	GHS Samandar Garhi	1			1
21	Nowshera	291621	GHS Spin Kani Khurd ✓	1	1	1	3
22	Nowshera	291622	GHSS Khesghi Pavan	1			1
23	Nowshera	291623	GHSS Nizampur NSR	1		1	2
24	Nowshera	291624	GHSS Rashakai NSR ✓	1	1		2
25	Nowshera	291625	GMS Ali Abad			1	1
26	Nowshera	291626	GMS Jabba Daudzai			1	1
27	Nowshera	291627	GMS Shahab Khel Ziarat Kaka Sahib			1	1
TOTAL				13	8	22	43

ATTESTED

33 Post

33 Maths Phy

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

NTS Circle

20



PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail rafiq_kk851@yahoo.com

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem). (SST Maths Phy), (SST General) School based in BPS-16 (Rs. 15880-1280-54280) @ Rs. 15880/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:

(SST Bio Chem)

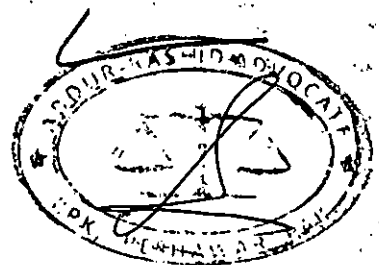
Roll No	Name	Father Name	Permanent Address	Academic Marks [out of 100]	NTS Marks [Out of 100]	Total Marks [Out of 200]	School
571020265	Zahir Ali	Amir Zaman Khan	Civil Bazar Risal Pur Cantt District And Tehsile Nowshera CNIC No.17201-5704473-3	64.44	75	139.44	GHS Zando Banda
601001003	Abdul Rahim Khan	Abdul Hassan	C/O Teriq General Store Near Bilal Masjid Street Bilal Lane Arbab Road University City Town Peshawar CNIC No.17201-1562500-1	67.03	69	136.03	GHS Dag Besud
573001557	Manzoor Hussain	Biladar Khan	Village Gulistan Korona Mohallah Mandoori Khesgi Bala Post Office Khesgi Payan, District Nowshera CNIC No.17201-3990071-1	67.08	66	133.08	GHS Kotar Pan
571000264	Nouman Zeidi	Shoukat Ali	Vill Khudrizai Muhallah Somandar Garhi Teh Pabbi Distt Nowshera CNIC No.17201-5575446-1	69.98	61	130.98	GHS Wazir Khan
111000747	Jehanzeb Shah	Muzahid Gul	Mohallah Daulau Sharif Village And Post Office Ziafat Kaka Sahib Nowshera CNIC No.17201-8115146-5	62.29	68	130.29	GHS Mistri Banda
571000284	Muhammad Ali Khan	Fakir Khan	Village Post Office Pabbi Mohallah Khan Sher Garhi Near Speen Jumat Tehsil Pabbi CNIC No.17201-9507958-5	73.16	57	130.16	GHS Pabbi
601001205	Rameen Ullah	Tawus Gul	Mohallah Ahmad Khalil Village & P/O Kahi Nizampur Nowshera CNIC No.17201-7280556-9	74.77	55	129.77	GHS Daniqazi
571000270	Ilaf Hussain	Manoor Hussain	Moh Mian Bahdur Shah Village Amankot Post Office Pabbi Tehsil Pabbi District Nowshera	60.57	69	129.57	GHS Mal Khan

STAMPED

Nowshera Male Appointment Order SST Adhoc

(7)

601000816	Muhamina d Ismail	Manzoor Ahmad	CNIC No.17201-6717291-1 H No 2 St Hazrat Ali Malikabad Near Wapda House Peshawar CNIC No.17201-7417518-5	60.55	67	127.55	GHS PAF Risalpur
571000288	Zar Ali Khan	Gul Hassan	Mohallah Malakam Vill And Post Office Tasujabba Tehsil Pabbi District Nowshera CNIC No.17201-7142797-5	60.48	67	127.48	GHS Kandi Taza Din
571000281	Sadiq Hussain	Samin Jan	Mondoori Zande Banda Chail Post Office Khesghi Payan Tehsil And District Nowshera CNIC No.17201-6946252-3	72.29	55	127.29	GHS Hamza Rashakai
571000309	Fazal E Rabbi	Fazal E Majced	Mohallah New Kanday, Village Tarkha, Post Office Tari Jabba, Tehseel Pabbi, District Nowshera, Khyber Pakhtoon Khwa, CNIC No.17201-8352733-5	61.35	65	126.35	GHS Mohab Banda
571000263	Kawal Shah	Rasheed Shah	Fg Public School Number 1 Boys Nowshera Cantt District Nowshera, Kpk CNIC No.41104-0195867-3	63.99	62	125.99	GHS Spina Khak
571000274	Ihsan Zada	Sharif Zada	Mohalla Nasir Khel Village And Post Office Jaroba Tehsil Pabbi District Nowshera CNIC No.17201-4376655-5	61.77	63	124.77	GHS Jabbi
571000291	Mian Sylaiman	Mian Kifayat Ullah	Mohallah Mian Khel-Pabbi, Village And Post Office Pabbi District Nowshera, CNIC No.17201-5033473-9	59.63	65	124.63	GHS M. Sham Ghani
571000237	Muhamma d Arif	Muham mad Shañ	Village And Post Office Mohib Banda District Nowshera, Pabbi, Nowsher, CNIC No.17201-2725436-7	60.6	64	124.6	GHS Banda Nabi
571000251	Muhamma d Shoub	Suleman Gul	Mohallah Shahi Bagh Shaidu P/C 24030 District And Tehsil Noshera CNIC No.17201-2108894-9	61.29	63	124.29	GHS Jehangira Road
571000359	Abbas Ali-Shah	Javed Ali Shah	Mohallah Tor Khel Village And Post Office Ziarat Kaka Sahib CNIC No.17201-8069989-1	65.18	58	123.18	GHS Mank Sham
571000300	Muhamma d Kamran	Muham mad Tanveer	House Number 227/9 Ra. Bazar Nowshera CNIC No.17201-1330787-5	61.73	61	122.73	GHS Risalpur NSR
571000270	Adnan Akbar	Abdul Akbar	Muhammad Khen Colony Risalpur Saddar District Nowshera CNIC No.17201-8700682-7	61.64	61	122.64	GHS PAF Risalpur
571000270	Farhan Ali	Shoukat Ali	Mohallah Goodan Village And Post Office Box Shaidu Tehsil Jehangira Nowshera CNIC No.17201-4515910-5	64.5	58	122.5	GHS Khaura
571000270	Shahid Ahmad	Filawar Khan	Village Watter Post Office Alora Khattak District And Tehsil Nsr	55.2	67	122.2	GHS Shaidu No2



Nowshera Male Appointments

22

23	571000321	Idrees Anwar	Anwar Iqbal	Mohalla Kakayzai Village Akora Khattak Tehsil Jehangira District Nsr CNIC No.17201-3845384-5	58.14	63	121.14	GHS Cheshmai
24	601000528	Abid Ali	Muham mad Ah	Village & P/O Taru Jabba Dist. Nowshera Teh Pubbi CNIC No.17201-5874716-3	61.27	59	120.27	GHS Wala
25	571000384	Masoud Shah	Sultan Badshah	Mohallah Shahbaz Khel Village Garu Post Office Nizampur District Nowshera District CNIC No.17201-3632980-9	59.11	61	120.11	GHS Garu
26	201000364	Abdul Basar Badshah	Anhar Badshah	Kheshgi Bala Village Babjee Kili Mohallah Faqeer Abad Post Office Kheshgi Payan Nowshera CNIC No.17201-8915328-9	60.2	59	119.2	GHS Pirsabaq
27	571000297	Tahir	Khalil Gul	Village Issory Payan Post Office Akora Khattak Tehs Ljehagar District Nowshera CNIC No.17201-2479074-5	62.73	56	118.73	GHS Bagh Ban Pura
28	571000255	Amun Ullah Khan	Esso Khan	Village Balu Mohalla Shaheed Baba, Post Office Jabbra Tehsil Pabbi, District Nowshera, Kpk CNIC No.17201-9056293-9	54.6	64	118.6	GHS Banda Sheikh Ismail
29	571000288	Ibn E Ameen	Jan Muham mad	Mohallah Lali Kehi Khighi Bala Mehra Post Office Kheshgi Payan Nowshera CNIC No.17201-7566735-3	55.33	63	118.33	GHS Wattar
30	571000301	Muhamma d Khalid	Faqir Hussain	Village And Chand Bibi Post Office Pabbi District Nowshera CNIC No.17201-2241100-3	59.82	58	117.82	GHS Dagh Banda
31	571000312	Khalid Din	Noor Madin	Mohallah Khawaja Khel Village And Po Kahi Dist Nowshera CNIC No.17201-1888635-3	52.79	65	117.79	GHS Khair Abad
32	571000308	Amallah	Rahmat Ullah	Masjid Rahim Ullah Mohallah Yado Khel Village Dag Behsood Post Office Box Pabbi Tehsil Pabbi District Nowshera CNIC No.17201-5420182-7	59.67	56	115.67	GHS Sheikhan
33	571000256	Muhamma d Kamal Khan	Muham mad Zahar	Kheshgi Bala Babjee Killi District And Tehsil Nowshera Post Office Kheshgi Payan Bala CNIC No.17201-3505225-9	62.44	53	115.44	GHS NSR Kalan

(SST Maths Phy)

Name	Father Name	Permanent Address	Academic Marks (out of 100)	NTS Marks (Out of 100)	Total Marks (Out of 200)	School
Muhammed Amir Zia	Zia Ur Rahman	Mohallah Sammander Garhi Village Khudrezai Post Office Pabbi District Nowshera	70.58	59	129.58	GHS Kandi Taza Din

ATTESTED

Resubmission Male Appointment Order SSI Adhoc (23)

1	57200017	Sahwan Khan	Dilaram Khan	CNIC No.17201-5765186-1 Village Ismail Khel Po Akora Khattak CNIC No.17201-5465078-3	61.95	67	128.95	GHS Zaran Miana
2	57200020	Zahir Ullah	Sarmy Khan	Mohallah Kalinger Sohbat Korona Post Office Risal Pur District Nowshera CNIC No.17201-0900540-3	64.64	64	128.64	GHS Bara Banda
3	572000165	Muhammad Ismail Khan	Fida Muhammad	Shobra Chowk Babo Mohallah House No 1080 Nowshera Cantt CNIC No.17201-9563952-3	66.91	60	126.91	Goult, Shaheed Mujahid Hussain Shah High School Taru Jabba
4	572000102	Zahir Shah	Abdul Karim Khan	Dehry Kalinger Post Office Risalpur Tehsil And District Nowshera CNIC No.17201-5146008-3	64.49	62	126.49	GHSS Risalpur NSR
5	572000109	Muhammad Tufail	Muhammad Bashir	Mohallah Umer Farooq Village Rashakai District And Tehsil Nowshera CNIC No.17201-5776189-9	62.97	63	125.97	GHS Mistri Banda
6	602000619	Abdul Saboor	Abdul Rauf	Mohallah Umar Farooq Rashakai Tehsil And District Nowshera CNIC No.17301-4750275-9	68.95	57	125.95	GHSS Rashakai NSR
7	572000089	Atiq Ur Rehman	Shaheen Akbar	Village Dagi Jaded Post Office Dagi Banda Pabbi District Nowshera CNIC No.17201-3683958-5	63.92	62	125.92	GHS Shah Kot
8	572000201	Latqman Ud-Din Khattak	Jamal Ud Din Khattak	Mohallah Abbas Khel Village And Post Office Dak Ismail Khel Tehsil Pabbi District Nowshera, CNIC No.17201-3779612-5	61.76	64	125.76	GHS Jaroba
9	572000072	Khagan Ali Shah	Sabir Chani	District Teh Nowshera P O Akora Khattak Village Chashmai CNIC No.17201-4711102-7	67.17	58	125.17	GHS Cheshmai
10	572000119	Murad Ali	Rahmat Ullah	Village And Post Office Tarkha Tehsil Pabbi District Nowshera CNIC No.17201-1639233-9	67.97	57	124.97	GHS Kurui
11	572000201	Irfan Ullah	Sheraz Gul	Village And Post Office Nizampur District Nowshera CNIC No.17201-6875469-3	61.74	63	124.74	GHS Garu
12	572000183	Bahar Ali	Liaqat Ali	Mohallah Khattak Village And Post Office Khesghi Payan District And Tehsil Nowshera CNIC No.17201-1451920-1	58.63	65	123.63	GHSS Khesghi Payan
13	572000193	Shah Zeb Nawaz	Sarfraz Khan	Street Mangal Peer Baba Village Jabba Daud Zai Oo Akbar Pura Teh Pabi Nowshera CNIC No.17201-1510040-1	67.53	56	123.53	GHS Zaki Qabristan
14	572000163	Muhammad Arif	Muhammad Ibrahim	Mohallah Safdar Shall Village And Post Office Akbarpura Tehsil Pabbi Distt Nowshehra CNIC No.17201-4092934-5	60.35	63	123.35	Goult, Shaheed Waseem Iqbal High School Tarkha
15	602000169	Asad Muhammad	Sardar Muhammad	Village Kotli Kalan Mohallah Namawar Khel Post Office Saleh Khana Teh Sil Pabbi District Nowshera CNIC No.17201-7666659-7	61.75	61	122.75	GHSS Spin Khali

ATTEST

(24)

572000107	Sapna Ah	Saiz Ah	Dist. Tan. Darwesh Khel Vill Po Saida Teh Jhangaria CNIC No.17201-1771732-9	65.58	57	122.58	GHS Khawrai
572000107	Noor Ul Fhalig	Saif Ullah	District And Tehsil Nowshera Village And Post Office Kahi Mohallah Miaz Khel CNIC No.17201-5772333-5	63.27	59	122.27	GHSS Jabbi
572000107	Muhammad Fairan	Noor Habib	Village Kalinger Pso: Office Risal Pso District Nowshera CNIC No.17201-8838950-1	62.25	60	122.25	GHS Behram killi
572000107	Muhammad Waheed Ahmad	Tilawat Khan Khattak	Mohallah Qurban Khel Village And Post Office Jallozi District Nowshera Tehsil Pabbi CNIC No.17201-3136452-7	61.23	61	122.23	GHSS Jallozi
572000161	Ajmal Khan	Safdar Khan	Village Banda Shekh Ismail Tehsil Pabbi District Nowshera CNIC No.17201-0409766-3	67.11	55	122.11	GHSS Akbar Pura
572000186	Saeed Ullah	Amin Ullah	Mohallah Mondi Khail Vill Main Essa Po Abc CNIC No.17201-2685182-3	65.88	56	121.88	GHSS Khair Abad
572000263	Farhat Ullah	Sher Mohamad	Mohallah Akhter Abad Village And Post Office Akber Pura Tehsil Pabbi District Nowshera CNIC No.17201-2091730-5	58.45	63	121.45	Gout. Shaheed Muhammad Waseem High School Pir Pai
572000101	Fida Hussain	Usman Uddin	Moh Ghareeb Abad Vill And Po Keshgi Payan CNIC No.17201-9602384-9	58.29	63	121.29	GHS Khatt Killi
572000057	Majid Shahzad	Chulam Muhamad	Mohallah New Gul Bahar Post Office Akora Khattak District Nowshera CNIC No.17201-1731548-3	57.76	63	120.76	GHSS Adami Zai
572000129	Imran Khan	Fazali Rabbi	Maira Keshgi Bala Mohallah Abdul Karim Baba Korona Post Office Keshgi Payan Nowshera District Nowshera CNIC No.17201-7999705-9	66.41	54	120.41	GHS Nofor Cantt
572000095	Wajid Khan	Rahim Khan	Mohallah Mana Khail Village Dheri Katti Kahir Tehsil And District Nowshera CNIC No.17201-3085010-3	56.22	64	120.22	GHS Walai
572000180	Muhammad Ayaz	Abdullah Jan	Village Dawa Kalay Post Office Akbar Pura District Nowshera CNIC No.17201-9749530-9	54.2	66	120.2	GHS Mohb Banda
572000209	Taimoor Farooq	Umar Farooq	Mohallah Arif Abad Village Keshgi Bala Post Office Keshgi Payan District And Tehsil Nowshera CNIC No.17201-5373650-7	58.92	61	119.92	GHSS Akbar Pura
112000291	Junaid Khan	Shewa Khan	Village Ismail Khel Post Office Akroa Khattak Dist Teh Nowshera CNIC No.17201-9699431-3	61.69	58	119.69	Gout. Shaheed Mujahid Hussain Shah High School Tanu Jabba
572000295	Sabir Rehman	Shams Ur Rehman	Mohallah Rehmanabad Village Comay, Post Office Nizampur, District Nowshera CNIC No.17201-8240415-5	57.25	60	117.25	GHS Hsar Tang

APPROVED

Roll No	Habib Er Rehman	Mohallah Sadia Abad Village And Post Office Shaidu CNIC No.17201-1701076-3	58.21	53	111.21	GHS Manahi
Disaple Quota	Hayat Ullah	Mohallah Meta Khel Village Kheshgi Bela Post Offi Ce Kheshgi Payan Nowshera CNIC No.17201-3419184-3	63.85	48	111.85	Services placed at the disposal of DEO(M) Nowshera

(SST General)

Roll No	Name	Father Name	Permanent Address	Academic Marks (out of 100)	NT S Marks (Out of 100)	Total Marks (Out of 200) J=11+1	School
573001307	Zakir Ud Din	Kalam Ud Din	Moh Mastana Village Nizam Pur Distt Nowshera CNIC No.17201-0768333-5	64.22	85	149.22	GHS Nizampur NSR
573001114	Sajjad Ali Khan	Tamash Khan	Mohalla Samander Garhi Nowshera Kalan Near Tangaza Gah CNIC No.17201-7955256-3	70.05	78	148.05	GHS Risalpur NSR
573000897	Afrasiab Khan Khattak	Jamshed Khan	Mohallah Hajibad Village And Post Office Shaidu 24030 Tehsil Jehangira CNIC No.61101-7933893-5	63.02	84	147.02	GMS Saidu
573001330	Afaq Ahmad	Muzaffar Shah	Village Dagbehsood Post Office Lr/S Pabbi Tehsil District Nowshera CNIC No.17201-1411430-3	65.72	80	145.72	GHS Jalozai
573001367	Asif Iqbal	Sareer Iqbal	Mohallah Kaji Khel Bala Village Ziarat Kaka Sahib Nowshera CNIC No.17201-0390352-3	66.54	79	145.54	GHS Pirsabaq
573000985	Muhammad Tufail	Aurang Zeb	R.A Bazar Nowshera Cantt Lal Kurri House No.116 Street Noori Masjid Lalkurri CNIC No.17201-5231402-1	65.5	80	145.5	GHS Waitar
573001167	Zufar Anwar	Syed Anwar	Mohallah Akhun Khel Village And Post Office Shaidu Tehsil And District Nowshera CNIC No.17201-1027934-1	68.42	75	143.42	GHS Kahn
573001281	Inayat Ullah	Muhammad Said	Inayat Ullah Village Tanqeer Abad Post Office Akora Khattak Mistr Banda CNIC No.15704-0554399-3	61.09	82	143.09	GHS Mistr Banda
603003724	Imtiaz Alam Khan	Sameen Jan	Village Babi Jadeed Post Office Taru Jabba Tehsil Pabbi District Nowshera CNIC No.17201-2572020-7	68.9	74	142.9	GHS Rashakai NSR
573000860	Asif Nawaz	Anwar Khan	Village Nari Post Office Jehangira Tehsil Jehangira Road District Nowshera CNIC No.17201-2205558-5	64.17	78	142.17	GHS Jehangira Road
573000910	Syed Mchar Wali Shah	Syed Qabool Shah	Moh Piran Village And P/O Pirsabaq Teh And Dist: Nowshera CNIC No.17201-6620133-9	55.14	87	142.14	GHS Wali
573004230	Muhammad Waqar	Muhammad Nisar	Moh Gharib Abad Bara Banda P.O Risalpur Distt Nowshera CNIC No.17201-9417205-7	66.62	75	141.62	GHS Pirsabaq

STE

14	03300231	Muhammad Shafiq	Muhammad Hanif	Mohallah Nawababad Khesghi Bala P.O Khesghi Poyan CNIC No. 17201-2163659-5	66.14	75	141.14	GHS/AC Centre
15	03300232	Shakoor Ahmed	Niaz Gull	Village And Post Office Kahi Teh And Distt Mowshera CNIC No. 17201-0573284-3	63.67	77	140.67	GHS/Hisar Hing
16	03300233	Shahid Khan	Hameed Khan	Village Sapano Kally Po Risapur Teh And Distt Nowsheera CNIC No. 17201-5207248-7	62.65	78	140.65	GHS/AC Centre

TERMS & CONDITIONS

1. NO TA/DA etc is allowed
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 1st May, 2017 to 30th April, 2018.
4. She should not be handed over charge if she exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His/her services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his/her certificates are verified.
8. He/She should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, his/her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He/she will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be proceeded under the rules framed from time to time.
12. His/her appointment is made on School based, He/she will have to serve at the place of posting and His/her service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

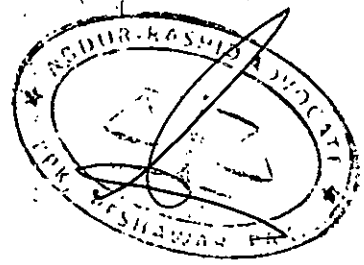
(Muhammad Rafiq Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

4879-4905
Ends: No. / File No. 2/A-14/SST/Adhoc/Apptt: Dated Peshawar the 28/04/2017.

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
 3. District Education Officers Concerned
 4. District Accounts Officer Concerned
 5. Official Concerned.
 6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
 7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 8. M/ File

Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

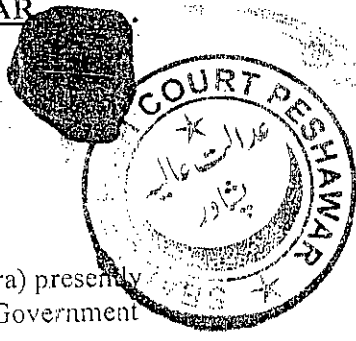


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THE PESHAWAR HIGH COURT PESHAWAR

In Ref: to WP No. 1495-F/2017.



1) Meed Khan S/O Pervaiz Khan R/O Dagbesood (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Meed Ali Abbas High School Dagbasoöd (Nowshera).

2) Dalil Khaul S/O Mutawal Khan R/O Akora Khattak (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Centennial Model High School Akora Khattak (Nowshera).

3) Rayaz Muhammad S/O Faqir Muhammad R/O Akbar Pura (Nowshera) working and posted as Senior primary School Teacher (SPST) Ali Shah (Pabbi/Nowshera).

4) Zain Ullah S/O Zardullah Khan R/O Dagbasood (Nowshera) working and posted as Senior primary School Teacher (SPST) at Government No. 5 Dagbasood (Pabbi/Nowshera).

X 5) Naseer Muhammad S/O Faqir Muhammad R/O working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Pabbi (Nowshera).

6) Asif Khan S/O Rahmani Gul R/O Aman Kot (Pabbi) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Amankot (Nowshera).

X 7) Amin-ur-Rehman S/O Khan Zada R/O Resalpur (Nowshera) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Barakabad (Nowshera).

8) Amir Muhammad S/O Adil Muhammad R/O Azakhel Payan, Nowshera, presently working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Azakhel Payan (Nowshera).

PETITIONERS.

VERSUS

1. Secretary to the government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat Peshawar.

2. Director, Elementary & Secondary Education Department, Province of Khyber Pakhtunkhwa Peshawar.

3. District Education Officer (Male) Nowshera..... RESPONDENTS.

FILED TODAY

Deputy Registrar

08 APR 2017

ATTESTED

EXAMINER

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN 1973 AS AMENDED UP-TO DATE 13 JAN 2018

WP 1495/2017

1
(33)
Judgment Sheet

IN THE PESHAWAR HIGH COURT, PESHAWAR,
JUDICIAL DEPARTMENT.

Writ Petition No. 1495-P/2017

Naveed Khan etc..vs...Secretary to Govt of
Khyber Pakhtunkhwa Elementary & Secondary
Education etc.



JUDGMENT

Date of hearing.....09.01.2018.....

Petitioner(s) by Mr. Muhammad Usman Khan Turlandi,
Advocate.

Respondent (s) by Mr. Muhammad Riaz Khan, AAG.

ROOH-UL-AMIN KHAN, J:- By invoking the constitutional jurisdiction of this Court under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioner seek their promotion to the post of SST (BPS-16) on the basis of seniority cum fitness against 75% quota reserved for promotion.

2. According to the contents of the writ petition, the petitioners joined the services in the respondents department and were lastly promoted to the posts of Senior Certified Teacher (SCT) and Senior Primary School Teacher (SPST) respectively and are performing their duties as such. The respondents in utter violation of Notification No. SO (PE)4-5/SSRC/Meeting/2013/Teaching

for the same

ATTESTED
EXAMINER
Peshawar High Court
13 JAN 2018

(34)

Cadre, dated 24.7.2014, whereby 75% quota for the posts of SST (BPS-16) has been served /sanctioned for promotion on the basis of seniority cum fitness and 25% for initial recruitment, advertised 62 vacant posts of Senior Science Teacher (BPS-16) to be filled up through fresh / initial recruitment, without reserving a single vacancy for promotion amongst the Senior Certified Teachers or Senior Primary School Teachers.

3. Learned AAG contended that the respondents-department has already considered the case of petitioners for promotion under their specified 75% quota, however they were lacking the requisite qualification, therefore, could not be considered. He pointed out that the petitioner No. 1 and 2 have qualified BSc examination in Math-A, Maths-B and Statistics and do not fulfill the criteria. Similarly petitioner No.7 has passed the BA/BSc in third division which is also does not come under the criteria of 75% quota. He stated that candidate who improved his qualification and got eligibility and fitness in accordance with the criteria shall be considered for promotion to the post of SST in the next meeting of Department Promotion

1. See Committee.

4. It is manifest from the comments that the respondents have not denied the quota of promotion @ 75% however the petitioners were considered and denied to be

ATTESTED
 EXAMINER
 Peshawar High Court
 13 JAN 2018

35

considered for promotion on the ground of lacking the requisite qualification and not fulfilling the criteria, hence the department has not committed any illegality or irregularity.

5. The contention of learned counsel for petitioners, that the petitioners have improved their qualification, therefore, they be considered for promotion w.e.f the date wherefrom their other colleagues have been considered, is unpersuasive for the reasons that such a writ cannot be issued under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, as Article 212 of the Constitution of 1973 debar this Court to interfere in the matter pertaining to terms and conditions of a civil servant.

6. For the reasons given hereinabove, the instant petition is disposed of accordingly. However, the petitioners would be at liberty to approach the proper forum, if so advised at the relevant time.

Announced on;
09th of January, 2018
"Zarshad"

Signature

JUDGE

Signature

JUDGE

(DB) Mr. Justice Rooh Ul Amin Khan & Mr. Justice Qalandar Ali Khan.

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorized Under Article 8.7 of
The Sanctioning Order 1984

13 JAN 2018



1. Secret *284*

Second of Application *10/1/18*

2. District

Pakistan (DB) Mr. Justice Rooh Ul Amin Khan & Mr. Justice Qalandar Ali Khan.

Copy Fee

Urgent Fee

Total

Date of Preparation of Copy *13/1/18*

Date of Delivery of Copy *13/1/18*

Received By *Signature*

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar (Pakistan)

Session Autumn 1992

of _____ and a student
of _____ having passed the prescribed examination
held in August 1992, is this day admitted by the University of Peshawar,
to the Degree of

Bachelor of Science

in the _____ Division

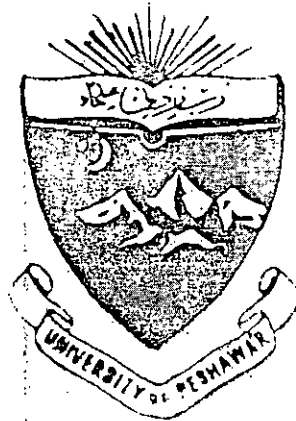
The Examination was taken as a whole / in parts

Serial No. 006348

Registered No. 87-N-2617

Roll No. 40542

Result Declared on 18TH MARCH 1993



Attested
S. C. T. C.
ZAIN ULLAH KHAN
S.S.T.(SC)(16)
G.S.S.H.S.S. Dakt.i.khel

Shakul Ahmad

Registrar

Countersigned

Vice-Chancellor



University of Peshawar

(PAKISTAN)

№ 021610

Detailed Marks Certificate

M.A. Pashto (Final) Examination 1995 (Annual / Supplementary)

Mr./Ms. Ameer Muhammad Khan Roll No. 10476

The candidate secured the following marks and has been placed in Second Division.

SUBJECTS	MARKS ALLOTTED	MARKS OBTAINED	MARKS IN WORDS
Paper III	100	42	Forty two
IV	100	61	Sixty one
VII	100	54	Fifty four
IX	100	45	Forty five
X	100	67	Sixty seven
VIVA	100	45	Forty five
Final -	600	314	
Previous -	500	256	
TOTAL :	1100	570	Five hundred & seventy only

Accepted
C.I.C.
S.S.H.S.S. (SC) (16)
S.S.H.S.S. Dak. I. Khel

Errors & omissions are subject to subsequent rectification.

The examination was taken as a ~~WHOLE~~ / IN-PARTS

Dated 24 OCT 1996

CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

33 فروری 2017ء

محل کار کا پتہ اور حوالہ نمبر

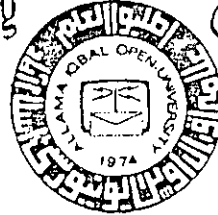
ASAD
Fazal
Lahore

41402

نمبر شمار

Roll No. I-6383581

Allama Iqbal Open University



علامہ اقبال اوپن یونیورسٹی

AMEER MUHAMMAD KHAN

Regn. No.

94-NNA-0273

رجسٹریشن نمبر

امیر محمد خان

son/daughter of

ADIL MUHAMMAD

عادل محمد

بن / بنت

having completed the prescribed requirements
in SPRING ~~pg~~ 2000 is awarded the degree of

۱۹ میں مطلوبہ شرائط مکمل کرنے پر

سہ ماہی ۲۰۰۰ء

Bachelor of Education

بی۔ ایڈ

He/She secured 63 % marks and was placed

in B grade.

۶۳ فیصد نمبر لے کر B گریڈ حاصل کیا۔

Vice Chancellor

وائس چانسلر

Islamabad

Dated: 22nd Dec, 2000

Controller of Examinations

کنٹرولر امتحانات

This degree is to be read in conjunction
with the Transcript, issued separately.

اسلام آباد
تاریخ ۲۲ دسمبر ۲۰۰۰ء

کے
سہ ماہی ۲۰۰۰ء
C.O.E.
ZAIN ULLAH KHAN
S.S.T.(SC)(16)
S.S.H.S.S. Dak.I.Khel

گورنمنٹ ڈائنر ایجوکیشن (Eq Sec) حیدرآباد کے لئے

عنوان: درخواست برائے (سینئر ایجوکیشن سبڈیفنڈ)

صاف عالی!

مذکورہ سب سے تعلق فروری کے لئے (SSJ) لکھنؤ مورم 28/8/08 ہوئی تھی۔
 صاف عالی 2016 میں ضلع نوشہرہ میں آئی. سی. (Phd Maths) کے 32 پوسٹ
 خالی تھے۔ یہ سب پوسٹ N.T.S. کو دئے گئے۔ ہم سینئر ایجوکیشن کے بار
 حق کے بارے میں اساتذہ کا 75% کوٹہ ڈیپارٹمنٹ کے بلکہ اس کے انداز کردار
 اس کے خلاف ہم نے پاپولرٹ سے رجوع کیا۔ اور پاپولرٹ نے مفصل
 دیا۔ کہ آئندہ ہونے والے DPC میں آج لکھنؤ فرسٹ
 ہم نے سینئر ایجوکیشن کے بلکہ اس کے انداز کردار کے بارے میں
 سوچا ہے۔ تو اب بھیر Suitable فورم پر اس کا حق کا مطالبہ کریں
 اس کے بعد آج صفا کو تحریری طور پر گزارش کرتے ہیں۔ کہ
 ہمیں سینئر ایجوکیشن سبڈیفنڈ ڈیپارٹمنٹ کے بارے میں
 دائرہ رسائی نہ ہو۔ تو بھیر ہم قانونی چارہ جوئی کا حق محفوظ رکھتے ہیں

Attested

ZAH ULLAH KHAN
 S.S.T.(SC)(16)
 G.S.S.H.S.S. Dak.i.khel

الفیاض

ph.d Maths

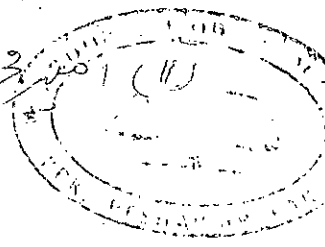
234
 31-12-19

ان زین اللہ خان (SSJ) کے لئے

گورنمنٹ ڈائنر ایجوکیشن سبڈیفنڈ

کول ڈاک ایسٹنٹ (Maths & Ph)

2018
 ضلع نوشہرہ
 ضلع نوشہرہ



 DISTRICT BAR ASSOCIATION DBA NOWSHERA	 DISTRICT BAR ASSOCIATION NOWSHERA	684
ایڈوکیٹ/دستخط: _____ بار کونسل/بار ایسوسی ایشن نمبر: 11-1652-BC رابطہ نمبر: 0300-5967898		
ڈسٹرکٹ بار ایسوسی ایشن نوشہرہ		

بعدالت جناب:

منجانب: اسلام آباد	دعویٰ: _____
امیر محمد - بنام سید امین گورکھانا	طاعت نمبر: _____
	مورثہ: _____
	جرم: _____
	تھانہ: _____
	باعت تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام **سید امین گورکھانا** کیلئے **محمد فاروق امیر محمد** کو وکیل مقرر کر کے
 اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقسیر
 حالت و فیصلہ برطاعت دینے جو اب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق زرین میں مدد تھلا کرنے کا اختیار
 ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اٹیل کی برآمدگی اور منسوخی، نیز دائر کرنے اٹیل نگرانی و نظر ثانی و پیروی
 کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جردی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے
 ہمراہ یا اپنے بچائے تقرر کا اختیار ہوگا، اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا
 ساختہ پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جہانہ التوا اپنے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول
 کرنے کا حقدار ہوگا کوئی بتاریخ پیشی مقام دور یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی مذکورہ کریں، لہذا
 وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 30-6-2020

العبد گواہ شد العبد

مقام: _____ کیلئے منظور ہے

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

Allah

VAKALAT NAMA

NO. _____/2021

IN THE COURT OF KP Service Tribunal, Peshawar

Amir Muhammad (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Department (Respondent)
(Defendant)

I/We, Amir Muhammad

Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2021

Amir Muhammad
(CLIENT)

ACCEPTED

Taimur Ali Khan
TAIMUR ALI KHAN
Advocate High Court
BC-10-4240
CNIC: 17101-7395544-5
Cell No. 0333-9390916

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar

(4) copy

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 9149/2020

Ameer Muhammad, SST (M) District Nowshera.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.....Respondents

JOINT PARAWISE COMMENTS FOR&ON BEHALF OF THE RESPONDENTS No: 1-3

Respectfully Sheweth :-

The Respondents submit as under:-

Preliminary Objections

1. That the appellant has got no cause of action/locus standai.
2. That the instant Service Appeal is badly time-barred. Hence is liable to be dismissed.
3. That no departmental appeal has been filed by the appellant.
4. That the instant appeal is liable to be dismissed for mis joinder & non-joinder of the necessary parties to the present appeal.
5. That the appellant is not an aggrieved person within the meaning of Article 212 of the constitution of Islamic Republic of Pakistan 1973.
6. That the appellant has filed the instant appeal on mala-fide intentions just to put extra ordinary pressure on the Respondents for the grant of illegal & even unauthorized service benefits.
7. That the appellant is estopped by his own conduct to file the instant appeal
8. That the instant Service Appeal in not maintainable in its present form.
9. That the appellant has been treated as per laws, rules & relevant policy in the instant case.

ON FACTS.

- 1 Needs no comments being pertains to the service record of the appellant.

- 2 Correct, with the explanation that all the rules and policies framed are duly observed by the respondents.
- 3 Incorrect on the grounds that the appellant could not be promoted to the post in question, being Junior to his colleagues in the seniority list of PSHT District Nowshera.
- 4 Correct, with the explanation that all the advertisements made by the respondents are just according to rules and policy.
- 5 Incorrect, hence denied on the grounds that more than 100 in-service teachers have been duly promoted to SST from various cadres according to their proportionate quota.
- 6 Partially Correct, with the explanation that the W.P No.1495-P/2017 under case titled Naveed Khan Vs Govt; of KPK & others, has been disposed by the Honorable Peshawar High Court vide order dated 09-01-2018 attached as **Annexure-A** with the declaration that the respondent department has not committed any illegality or irregularity in promotion however the petitioners were allowed to be at liberty to approach proper forum if so advised.
- 7 Incorrect on the grounds that the appellant has been promoted as SST BPS-16 post in year of 2019 instead of 2016 as per his service record in the Department.
- 8 Incorrect hence, denied as reply to this para has been given in the above paras.
- 9 Incorrect & misleading on the grounds that no Departmental appeal against the promotion order in the year 2018-19 has been filed by the appellant to the appellate authority under the Rules, hence got final & liable to be maintained. Therefore, the appeal in hand is liable to be dismissed on the following grounds inter alia:-


ON GROUNDS.


- A. **Incorrect & not admitted.** The act of the Respondent Department is legal & liable to be maintained in view of the above made submission in the present reply.
- B. **Incorrect & not admitted,** the appellant has been treated as per Law, Rules & policy by the Department; hence, the stance of the appellant is liable to be rejected.
- C. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected in view of the reply submitted in para-3 of the present reply.
- D. **Incorrect & not admitted.** The act of the Department is legal & according to policy.
- E. **Incorrect & not admitted.** As all the cadres have been duly promoted to SST in year 2016-17 according to their respective shares.

- F. **Incorrect & not admitted, as** appellant has been promoted to SST in 2018 on his own turn according to his seniority cum fitness position.
- G. **Incorrect & not admitted.** The appellant has been dealt according to law and policy.
- H. **Incorrect & not admitted.** As replied above.
- I. **Incorrect & not admitted.** As replied above.
- J. **Incorrect & not admitted.** The act of the Department is legal & just according to the rules and policy.
- K. **Incorrect & not admitted.** As replied above.
- L. **Incorrect & not admitted.** As appellant has been promoted to SST in 2018 on his own turn according to his seniority cum fitness position.
- M. **Incorrect & not admitted.** The cited judgments is not applicable upon the case of the appellant.
- N. **Incorrect & not admitted.** The appellant is not entitled for the grant of relief of his promotion w.e.f. 2016 instead of 2019 as SST in the Department. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated ___/___/2022.


SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2 & 3)

AFFIDAVIT

I. Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief.


Deponent

IN THE PESHAWAR HIGH COURT PESHAWAR

In Ref: to WP No. 1495 P /2017.



- 1) Naveed Khan S/O Pervaiz khan R/O Dagbesood (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Shaeed Ali Abbas High School Dagbasood (Nowshera).
- 2) Dalil Khaul S/O Mutawal Khan R/O Akora Khattak (Nowshera) presently working and posted as Senior Certified Teacher (SCT) at Government Centennial Model High School Akora Khattak (Nowshera).
- 3) Rayaz Muhammad S/O Faqir Muhammad R/O Akbar Pura (Nowshera) working and posted as Senior primary School Teacher (SPST) Ali Shah (Pabbi/Nowshera).
- 4) Zain Ullah S/O Zarduliah Khan R/O Dagbasood (Nowshera) working and posted as Senior primary School Teacher (SPST) at Government No. 5 Dagbasood (Pabbi/Nowshera).
- 5) Naseer Muhammad S/O Faqir Muhammad R/O working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Pabbi (Nowshera).
- 6) Asif Khan S/O Rahmani Gul R/O Aman Kot (Pabbi) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Amankot (Nowshera).
- 7) Amin-ur-Rehman S/O Khan Zada R/O Resalpur (Nowshera) presently working and posted as Senior primary School Teacher (SPST) at Government Primary School Barakabad (Nowshera).
- 8) Amir Muhammad S/O Adil Muhammad R/O Azakhel Payan, Nowshera, presently working and posted as Senior primary School Teacher (SPST) at Government Primary School No. 1 Azakhel Payan (Nowshera).

.....PETITIONERS.

VERSUS

1. Secretary to the government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat Peshawar.
2. Director, Elementary & Secondary Education Department, Province of Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Nowshera.....RESPONDENTS.

FILED TODAY
Deputy Registrar
08 APR 2017

ATTESTED
EXAMINER
Peshawar High Court
13 JAN 2018

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 AS AMENDED UP-TO DATE 13 JAN 2018

WP 1495/2017

Judgment Sheet

IN THE PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT.

Writ Petition No. 1495-P/2017

Naveed Khan etc..vs...Secretary to Govt of
Khyber Pakhtunkhwa Elementary & Secondary
Education etc.



JUDGMENT

Date of hearing.....09.01.2018.....

Petitioner(s) by Mr. Muhammad Usman Khan Turlandi,
Advocate.

Respondent (s) by Mr. Muhammad Riaz Khan, AAG.

ROOH-UL-AMIN KHAN, J:- By invoking the constitutional jurisdiction of this Court under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioner seek their promotion to the post of SST (BPS-16) on the basis of seniority cum fitness against 75% quota reserved for promotion.

2. According to the contents of the writ petition, the petitioners joined the services in the respondents department and were lastly promoted to the posts of Senior Certified Teacher (SCT) and Senior Primary School Teacher (SPST) respectively and are performing their duties as such. The respondents in utter violation of Notification No. SO (PE)4-5/SSRC/Meeting/2013/Teaching

ATTESTED
EXAMINER
Peshawar High Court
13 JAN 2018

For the Court

Cadre, dated 24.7.2014, whereby 75% quota for the posts of SST (BPS-16) has been served /sanctioned for promotion on the basis of seniority cum fitness and 25% for initial recruitment, advertised 62 vacant posts of Senior Science Teacher (BPS-16) to be filled up through fresh / initial recruitment, without reserving a single vacancy for promotion amongst the Senior Certified Teachers or Senior Primary School Teachers.

3. Learned AAG contended that the respondents department has already considered the case of petitioners for promotion under their specified 75% quota, however they were lacking the requisite qualification, therefore, could not be considered. He pointed out that the petitioner No. 1 and 2 have qualified BSc examination in Math-A, Maths-B and Statistics and do not fulfill the criteria. Similarly petitioner No.7 has passed the BA/BSc in third division which is also does not come under the criteria of 75% quota. He stated that candidate who improved his qualification and got eligibility and fitness in accordance with the criteria shall be considered for promotion to the post of SST in the next meeting of Department Promotion Committee.

4. It is manifest from the comments that the respondents have not denied the quota of promotion @ 75% however the petitioners were considered and denied to be

ATTESTED
EXAMINER
Peshawar High Court
13 JAN 2018

1/3/2018

considered for promotion on the ground of lacking the requisite qualification and not fulfilling the criteria, hence the department has not committed any illegality or irregularity.

5. The contention of learned counsel for petitioners that the petitioners have improved their qualification, therefore, they be considered for promotion w.e.f the date wherefrom their other colleagues have been considered, is unpersuasive for the reasons that such a writ cannot be issued under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, as Article 212 of the Constitution of 1973 debar this Court to interfere in the matter pertaining to terms and conditions of a civil servant.

6. For the reasons given hereinabove, the instant petition is disposed of accordingly. However, the petitioners would be at liberty to approach the proper forum, if so advised at the relevant time.

Announced on;
09th of January, 2018
"Zarshad"



Signature

JUDGE

Signature

JUDGE

No. 6284
Date of Presentation of Application 10/1/18
No of Pages 13
Copying Fee (DB) Mr. Justice Rooh Ul Amin Khan & Mr. Justice Qalandar Ali Khan
Urgent Fee
Total 40/-
Date of Preparation of Copy 13/1/18
Date of Delivery of Copy 13/1/18
Received By *Signature*

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Examiner
Peshawar High Court, Peshawar
Authorized Under Article 87 of
The Constitution of the Islamic Republic of Pakistan
13 JAN 2018