

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

Appeal No. 1395/2022

Abdul Ghafoor Rashid.....Appellant

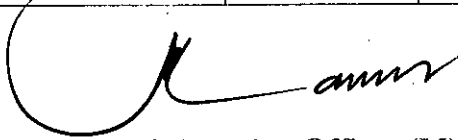
VERSUS

Govt. of KPK & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

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

Dated : 21-02-2023

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD**

Appeal No. 1395/2022

Abdul Ghafoor Rashid.....Appellant

VERSUS

Govt. of KPK & Others.....Respondents

SERVICE APPEAL

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

Joint Para Wise Comments on behalf of respondents are submitted as under:-

PRELIMINARY OBJECTIONS:-

1. That the appellant did not come to this Honorable Tribunal with clean hands.
2. That the appellant has got no cause of action/locus standi to file the instant Service Appeal.
3. That the instant Service Appeal has been filed just to pressurize the respondents.
4. That the appellant is estopped to sue through his own conduct.
5. That the present Service Appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
6. That the Appellant has concealed & distorted the material facts from this Honorable court.
7. That the instant Service Appeal is not maintainable in its present form.
8. That this Honourable Tribunal has got no jurisdiction to entertain the instant Service Appeal.
9. **That it is the sole prerogative of the Executive Authorities to frame policy or amend rules in accordance with the exigencies of service to cope up with the ever changing requirements and cannot substitute its views in the decision of the government with regard to the policy matters.**
10. That the instant service appeal is hopelessly time barred.
11. That according to the judgment of the Honourable Supreme Court of Pakistan reported as **2006 SCMR 1427** the Honourable Supreme Court while

discussing legal competence of the executive authorities in amending the rules or framing policy has held as under:-

“Government was always empowered to change promotion policy and domain of the Government to prescribe qualification for a particular post through amendment in relevant rules was not challengeable.”

12. That a similar view has been expressed in the case the Dr. Alvas Qadeer Tahir VS Secretary M/S Education (Now M/O Cadd) Islamabad and others (2014 SCMR-997) wherein the August Apex Court has held as under:-

“Enactment of rules or amendment therein is the prerogative of the Government. It can enact and amend the rules according to the needs and exigencies of service.”

13. That it is the prerogative of the Executive authorities to frame policy or amend rules in accordance with the exigencies of service to cope up with the ever changing requirements and the Tribunal cannot substitute its views in the decision of the Government with regard to the policy matters unless it runs counter to the mandate of the Constitution.
14. That it is settled principal of law that if the government introduced Policy/Rules even at the time of advertisement that will be applicable to those appointment (2013 SCMR 264).
15. That the instant Service Appeal is against the prevailing policy dated 24 July 2014 hence same is liable to be dismissed without any further proceedings and appellant did not challenge the said policy at any forum.
16. That appellant is not eligible for promotion from SAI to SST (BPS-16) as he does not fulfill the requisite criteria mentioned in the Policy dated 24-07-2014. Hence, Service Appeal is liable to be dismissed without any further proceedings.
17. That in pursuance to the directions of Honorable Peshawar High Court Abbottabad Bench in WP No. 221-A/2022 decided on 15-03-2022 departmental appeal of appellant was rejected by competent authority vide Notification Endst: No. SO(PE)/5-19/reinstatement/Speaking order/2022 dated 12-09-2022 in accordance with law, rules and policy and same is liable to be maintained as identical nature case was also dismissed by the Honorable Peshawar High Court Peshawar in WP No. 1316-P/2017 dated 15-11-2017.

18. **That as per judgment of August Supreme Court of Pakistan passed in Civil Appeal No. 2039 of 2019 dated 06-04-2022 appellant is not eligible for promotion on account of 3rd Division.**

Factual Objections:-


1. That the Para No. 1, of the Service Appeal relates to service record of appellant.
2. That the Para No. 2, of the instant appeal as composed is incorrect hence, denied and not admitted.
3. That Para No. 3, of the instant appeal is correct to the extent that the name of appellant reflected at serial No. 1 for Departmental Promotion Committee for promotion of SAT to SST (G) dated 11-11-2019 but the Departmental Promotion Committee did not recommend the name of appellant for promotion because of 3rd Division in B.A hence, appellant is not eligible for promotion for the post of SST (G) as the recruitment Rules dated 24-07-2014 the requisite qualification for the post of SST is at least second class Bachelor Degree's from a recognize University and eligible teachers have been promoted against the post of SST vide Notification No. 1262-71 dated 14-02-2020. (Copies of working paper, Recruitment Rules dated 24-07-2014 and promotion order dated 14-02-2020 are annexed herewith as annexure "A", "B" & "C" respectively)
4. That Para No. 4, of the instant appeal as composed is incorrect hence, denied and not admitted as appellant was rejected due to the 3rd Division in BA.
5. That the Para No. 5, of the instant appeal relates to record hence, need no further comment.
6. That the Para No. 6, of the instant appeal is correct.

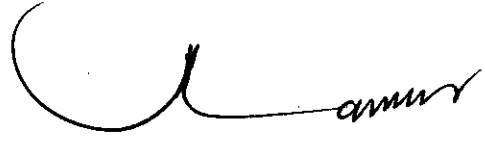
GROUND:-

- a. That ground a, as composed is incorrect hence, denied and not admitted as appellant is not eligible for promotion for the post of SST due to non-fulfillment of requisite criteria i.e. at least second class Bachelor Degree's from a recognize University whereas, appellant passed his B.A in 3rd Division from AUST. (Copy of Degree of BA is annexed herewith as Annexure "D")

- b. That ground b, as composed is incorrect hence, denied and not admitted. Comprehensive reply has already been given in preceding paras.
- c. In reply to ground c, it is submitted that appellant produced the copy of degree of BA 3rd Division from AUST University and did not fulfill the requisite criteria of promotion.
- d. In reply to ground d, it is submitted that the impugned orders are issued as per policy on the subject.
- e. As explained above.
- f. Incorrect. The respondents have acted in accordance with the policy. It is also important to mention that no illegality whatsoever has been committed by the respondents.
- g. That ground g, of the service appeal as composed is incorrect hence, denied and not admitted.
- h. That ground h, of the service appeal as composed is incorrect hence, denied and not admitted.
- i. That the respondents seek permission of this Honorable Tribunal to advance further grounds during arguments.

It is, therefore, very humbly prayed that in the light of forgoing comments the appeal in hand may graciously be dismissed with cost throughout.


Director E&SE Khyber Pakhtunkhwa
Peshawar
(Respondent No. 01 & 02)


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

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JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

AFFIDAVIT

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



13/3/2023

(Handwritten signature)

DEPONENT

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD
WORKING PAPER FOR DEPARTMENTAL PROMOTION COMMITTEES FOR PROMOTION OF
SAT TO SST (G) 11/11/2019

Ann - A''

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Total No. of vacant posts of SST (G)	66
25 % share of initial recruitment	16
75% share of promotion	49
4 % share of promotion of SAT	3
Post Available for Promotion	3
Proposed For Promotion S.NO. 2, 3 and 9	3

S.No.	Sr. No	Name of Official	Father Name	Name of school	Date of Birth	Date of Appointment Regular AT	Date of promotion as SAT	Qualification		Whether eligible for promotion	Committee Decision
								Acad.	Prof.		
1	6	ABDUL GHAFFOR Rashid	Rashid	GHS Mirpur	05-08-54	15-Apr-85	25/02/13	MA (Isl. BA) / B.A. / 3rd	S/Alimia / B.Ed.	No	3rd Division in B.A hence Not Eligible
2	36	ABDUR RAHEEM	NAWAB KHAN	GHS Moolia	30-May-68	9-Jan-85	28/02/13	MA (Isl) / 02.13.1991	Alimia / M.Ed	Yes	Recommended <i>OK</i>
3	37	SHOUKAT KHAN	AJAB KHAN	GHS SHICHAH UL BAKHT	20-Aug-77	23-Jan-85	26/02/13	MA (Isl) / 35.11.2010	MA (Isl) / Ist M Ed	Yes	Recommended <i>OK</i>
4	75	NASEER AHMED	Muhammed SAEED	GHS Banda Pir Khan	25-Dec-71	10-Sep-85	26/02/13	FA	Alimia	No	Not Eligible
5	76	RASHEED AHMED	TURAB KHAN	GHS No. 2 Aid	1-Apr-66	1-Oct-85	26/02/13	FA	Alimia	No	Not Eligible
6	79	HAFEEZ UR REHMAN	MUHAMMAD FAROOQ	GHS No. 2 Havelian	11-Feb-71	22-Dec-85	26/02/13	SSC	Alimia	No	Not Eligible
7	80	AHQ UR REHMAN	ALI AFSAR	GHS Nathiappah	5-Mar-74	12-08-1985 (4 T)	26/02/13	SSC	Alimia	No	Not Eligible
8	84	SAIF UR REHMAN	ABDUL MANAN	GHS Kuthiala	3 Oct-70	1-Oct-85	26/02/13	SSC	Alimia	No	Not Eligible
9	85	M.ZIA UL HAQ	MAGSOOD-UR-REHMAN	GHS Banda Pir Khan	15-03-1968	21-11-83	28-6-13	MA (Arabic)	BED / S Alimia	Yes	Recommended <i>OK</i>

- All the SAT (Male) included in the panel for the promotion of to SST(G) Post:
 - Hold the post on regular basis and none of them is holding the post on adhoc/acting charge/contract basis.
 - Have completed the required minimum length of qualifying service and qualifications as required for promotion of SST (G) under the rules.
 - None of them is on deputation to any organization under the Federal/provincial autonomous, international organization.
 - Neither any disciplinary/departmental proceeding/Anti-corruption/Judicial enquiry is pending against them nor any penalty has been imposed upon any one of them during the last five years.
 - None of them is on long leave/ix-Pakistan leave.
 - Their ACRs synopsis are free from adverse remarks.
 - They are alive and serving.
 - Their appointment order against AT post is attached herewith.
 - The seniority list of SAT officials is final, undisputed and not subjudice.
- The Departmental Promotion Committee is requested to determine the suitability of the above mentioned SAT for promotion to SST (G) with immediate effect.

S.No. 02, 03, & 09 only.
Recommended for promotion.
Aliq Othman
28/9/11

Recd. 11/11/19
11/11/19

DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

- | | | |
|--|----------|-------|
| 1 Director (E & SE) Peshawar | Chairman | _____ |
| 2 Deputy Secretary (E & SE) Peshawar | Member | _____ |
| 3 District Education Officer (M) A Abadi | Member | _____ |
| 4 Deputy Director (E & SE) Peshawar | Member | _____ |

Ann - B

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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)S&L/1-69/06/Vol-1/DPE/LIB dated, 12-11-2007, 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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				recruitment, and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3; Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service or such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, 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>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

			<p>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-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</p> <p>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-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p>
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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 at least five years service as such and having qualification mentioned in column No. 3;

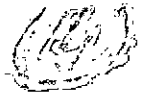
(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No. 3;

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

			<p>Primary School Head Teachers for promotion then the post shall be filled by 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 in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in 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 need basis separately."</p>
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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PTTE) 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

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD.

NOTIFICATION.

In pursuance to the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification issued vide Endst: No: 8553-58/File No.1 Promotion/SST PSB-16 dated 07-02-2020, the following SCT/CT, SDM/DM, SAT/AT, STT/TT, S.Qari/Qari and PSHT/SPST/PST (Male) are promoted to the post of SST (G) and SST (Physics/Math) 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 conditions given below and they are hereby further posted against vacant post of SST (B-16) in the schools noted against their names with immediate effect.

S. NO	SEN NO	NAME OF TEACHER	NAME OF SCHOOL	DATE OF BIRTH	PLACE OF POSTING	REMARKS'
1	128	SAKHI SULTAN SCT	GHS KAKUL	22-11-1961	GHS KAKUL.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
2	129	MUHMAD JAVED SCT	GHS JARRAL	01-01-1968	GHS JARRAL	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
3	133	MUSHTAQ AHMED SCT	GHSS RICH BHEN	14-04-1967	GHSS RICH BHEN	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
4	134	JAVED SCT	GHSS NAGRI BALA	01-05-1964	GHSS NAGRI BALA	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
5	139	ZIA UR REHMAN SCT	GHSS NAWANSEHR	30-04-1967	GHS MIRPUR	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
6	140	TANVEER HUSSAIN SCT	GHS NO.3 A/ABAD	20-04-1967	GHS NO.3 A/ABAD	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
7	143	MUHAMMAD RUSTAM SCT	GHSS MOHRI BED BHEN	02-07-1969	GHSS MOHRI BED BHEN	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
8	145	MUHMAD ISHAQ SCT	GHS MAIRA REHMAT KHAN	02-04-1964	GHS NAMLI MAIRA	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
9	146	MUHAMMAD WAJID SCT	GHSS MUSLIMABAD	13-04-1965	GHSS MUSLIMABAD.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
10	147	DILDAR KHAN SCT	GHS NO.1 HAVELIAN	09-09-1961	GMS KIALA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
11	151	MUHAMMAD ILYAS SCT	GCMSS ABBOTTABAD	02-03-1968	GMS DOBATHER..	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
12	153	MUHMAD KHURSHID SCT	GCMSS ABBOTTABAD	12-10-1964	GHS BEERAN GALI	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
13	154	GUL FARAZ SCT	GHSS NATHIA GALI	06-12-1966	GHS TOHEEDABAD	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
14	155	MUHAMMD IMRAN SCT	GHSS BANDI DHUNDAN	21-04-1965	GMS BANDI DHUNDAN.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
15	156	ZAFRAN KHAN SCT	GHS DHAMTOUR	16-10-1967	GMS DHERI KEHAL	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
16	157	MUHAMMAD SIDDIQUE SCT	GHS KOTHWAL	08-08-1965	GHS KUKMONG	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
17	162	MUHAMMAD RAMZAN SCT	GHS NO. 4 ABTD	01-03-1966	GMS PIRKOTE	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
18	163	KHAN AKBAR SCT	GHSS NAGRI BALA	13-06-1967	GHS BAGAN.	PROMOTED & POSTED AS SST(G) AGAINST V/POST.
19	165	SAIF UR REHMAN SCT	GHS SATORA	10-03-1962	GHS SATORA	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
20	166	ABDUL WAHEED SCT	GCMSS ABBOTTABAD	20-04-1961	GCMSS ABBOTTABAD.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
21	167	MUHMAD AKRAM SCT	GHSS RICH BHEN	03-04-1964	GHS CHAMHATTI	PROMOTED & POSTED AS SST (G) AGAINST V/POST.

Amir
14/02/2020

(15)

23	169	ARIF MASOOD SCT	GCMSS ABBOTTABAD	10-01-1970	GHS NAMLI MAIRA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
24	24	HALEEM SHAH SDM	GHS KOKAL BARSEEN	15-04-1973	GMHS HAVELIAN	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
25	26	MUHAMMAD JAVED SDM	GHS DHAMTOUR	16-04-1962	GHSS ZAIRAT MASOOM.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
26	27	HAKAM DAD SDM	GHSS HARNO	15-04-1969	GMS THUNDA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
27	36	ABDUR RAHEEM SAT	GCMSS ABBOTTABAD	18-06-1970	GHS NAMLI MAIRA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
28	37	SHOUKAT KHAN SAT	GHS MOOLIA	30-05-1968	GHS MOOLIA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
29	85	M.ZIA UL HAQ SAT	GHS SHEIKH UL BANDI	20-08-1977	GHS SHEIKH UL BANDI.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
30	11	BINYAMIN STT	GHS BANDA PIR KHAN	15-03-1968	GHS PATTAN KALAN	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
31	22	MUHAMMAD JAVED STT	GHS KERI RAIKI	02-02-1976	GHS MAKOOL PAYEEN.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
32	25	ABDUL SHAKOOR STT	GHS HADORA BANDI	28-01-1980	GMS PALL.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
33	6	MUHAMMAD SALEEM SENIOR QARI	GHS JHANGI	10-05-1983	GHS KUTHIALA	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
34	12	TAUFAIL AHMAD SENIOR QARI	GHS CHANDO MAIRA	15-04-1959	GHS GHORA BAZ GRAN.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
35	564	ARIF JAVED PSHT	GHS NAMMAL	10-05-1970	GHS SUMA KARAGA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
36	643	GUL KHATAB PSHT	GPS ANDER SERI	25-08-1969	GMS KHUKHRIALA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
37	656	SULTAN MEHMOOD PSHT	GPS THUBA	12-09-1965	GMS MARI.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
38	800	ABDUL WAHEED PSHT	GPS KALAL KOTE	08-06-1965	GMS TOPA KHAN KALAN.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
39	832	MUHAMMAD HAFEEZ PSHT	GPS NALOTHA	04-01-1971	GHS TAKIA SHEIKHAN	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
40	841	MUHAMMAD ASGHAR PSHT	GPS CHATTRRI	14-04-1970	GHS LAKHIALA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
41	842	MUHAMMAD RIZWAN PSHT	GPS KOLALIAN	25-03-1969	GHSS BIROTE.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
42	843	ABDUL RASHEED PSHT	GPS KAHU BIROTE	01-04-1969	GHSS BIROTE.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
43	877	MUHAMMAD YOUSAF PSHT	GPS MAJUHAN	25-01-1970	GMS HATROL.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
44	878	MUHAMMAD HANIF PSHT	GPS JAB KARI	31-12-1971	GMS SERI KHAN KALAN	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
45	881	MUHAMMAD IBRAHIM PSHT	GPS TARHANA BALA	16-05-1972	GHS BAGH.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
46	110	ARSHAD ZAREEN DM	GPS BACHA SANI	01-02-1973	GMS RIALA.	PROMOTED & POSTED AS SST (G) AGAINST V/POST.
47	2231	WAHEED UR REHMAN PST	GMS HAZEERA	10-04-1987	GHS KERI RAIKI	PROMOTED & POSTED AS SST (M/P) AGAINST V/POST.
			GPS PHALKOT	08-02-1990	GHS SHEIKHUL BANDI	PROMOTED & POSTED AS SST (M/P) AGAINST V/POST.

M. Anwar
14/02/2020.

- 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 regulations 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 probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
 4. Charge report shall be submitted to all concerned.
 5. Their inter-se-seniority on lower post will remain intact.
 6. No. TA/DA is allowed for joining their duty.
 7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
 8. Before handing over charge their documents may be checked, if they have not the required relevant qualifications as per rule, they may not be handed over charge of the post.
 9. Their promotion subject to the condition that their B.A/B.Sc: & B.Ed Degrees will be verified from the concerned Universities by this office, anyone found producing bogus degrees will be reported to the law enforcing agencies for further action

Sd/-
 DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD.

Dated A.Abad the 14/02 /2020

Endst: No. 1262-71 /EB-I/Promotion SST

Copy forwarded to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Abbottabad.
3. District Monitoring Officer(IMU) Abbottabad.
4. All the Principals/Headmasters of concerned Schools.
5. PS to Secretary to Govt: of Khyber Pakhtunkhwa, E&SED Peshawar.
6. Sub Divisional Education Officer(M) Abbottabad, Havelian, Lora and Lower Tanwal.
7. Budget & Accounts Officer local office.
8. AP EMIS branch local office.
9. All the Teachers concerned.
10. Master File

Ummar
 DY: DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD

Serial No. 000583

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 17-AUST-P-2427

Roll No. 17379

Ann. D

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ABBOTTABAD UNIVERSITY OF SCIENCE & TECHNOLOGY, PAKISTAN



AUG 2018
Abdul Rashid

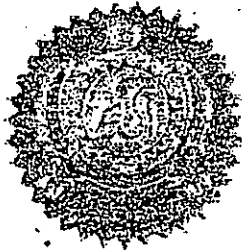
The University in recognition of the fulfilment of prescribed requirements has conferred upon
Mr. / Ms. ABDUL GHAFUOR RASHID Son / Daughter of KALAM

The Degree of
BACHELOR OF ARTS

in the examination held in June, 2018 session ANNUAL EXAMINATION 2018

He / She was placed in THIRD Division / Grade / CGPA.

THE EXAMINATION WAS TAKEN AS WHOLE



[Signature]
Controller of Examinations

Date SEPTEMBER 15, 2018

[Signature]
Vice Chancellor

[Signature]
Registrar