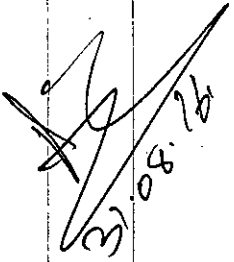


Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	31.08.2016	<p align="center"><u>BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR</u></p> <p align="center">Appeal No. 323/2015</p> <p align="center">Mr Inayatullah Versus The Secretary, Elementary &amp; Secondary Education, Khyber Pakhtunkhwa, Peshawar and 3 others.</p> <p align="center"><u>JUDGMENT</u></p> <p align="center"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:-</u></p> <p>Appellant with counsel and Mr. Usman Ghani, Senior Government Pleader alongwith M/S Khursheed Khan, SO and Hameedur Rahman, A.D for the respondents-present.</p> <p>2. Mr. Inayatullah, S.C.T, GHS Nasapa Payan, District Peshawar hereinafter referred to as the appellant has preferred the instant service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 with a prayer to direct the respondents to consider him for promotion to the post of SST (General) on the basis of batch-wise/year-wise merit or on the basis of provincial-wise seniority against 40% quota fixed by the Government, from due date with all back and consequential benefits.</p> <p>3. Brief facts of the case of the appellant are that he was appointed as C.T teacher in Education Department vide order dated 04.10.1989. That the respondent-department made promotions/appointments to the post of SSTs/SETs on batch-</p>

~~31.08.16~~

wise merit till year 2004 where-after no such orders were passed till 2012. That new rules were promulgated in the year, 2012 for promotion of SST (General) wherein 40% quota was allocated for promotion of SCT/CT to SST (General) and there-after promotions of SST (General) were made on the basis of the said rules on 28.10.2014 wherein rules were not followed as the posts of SSTs were of provincial cadre and required to be filled in by provincial-wise seniority while the same were filled in on the basis of district-wise seniority and as such the appellant deprived from his due right of promotion where-against he preferred departmental appeal on 27.11.2014 which was not responded and hence the instant service appeal on 24.03.2015.

4. Learned counsel for the appellant has argued that the post of SST is a provincial cadre post which was erroneously treated as district cadre post. That no promotion after the year, 2004 till 2012 were made despite the fact that the appellant was entitled to consideration for promotion as he was fulfilling pre-requisites and vacancy for his promotion was available. That the appellant was having legitimate expectancy of consideration for promotion. That delay on the part of the respondents from the year, 2004 till the year 2012 would not deprive the appellant from his right for consideration of promotion against a vacancy accruing at that time. That rules framed in the year, 2012 cannot be given retrospective effect for filling the vacancy accrued for promotion prior to promulgation of the new rules.

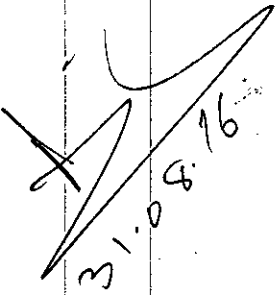
  
31.08.26

5. Reliance was placed on cases-law reported as 2002-PLC(C.S) 1388 (Punjab Service Tribunal), 2015 PLC (C.S) 215 (Peshawar High Court), 2010 PLC (C.S) 760 (Supreme Court of Pakistan), 2012-SCMR-965 (Supreme Court of Pakistan), 2009-PLC (C.S) 178 (Federal Service Tribunal) and 1997-SCMR-515 (Supreme Court of Pakistan).

6. Learned Senior Government Pleader for respondents has argued that the appellant is to be promoted in due course and that his promotion is to be considered in the light of newly promulgated rules. That the appellant cannot be considered for promotion with retrospective effect. That the policy of the provincial government at the relevant time was appointment through initial recruitment. That the appeal of the appellant is time-barred and as such the same is liable to dismissal.

7. We have heard arguments of learned counsel for the parties and perused the record.

8. It was not disputed before us that no promotions whatsoever were made after the year 2004. We are however not in a position to undertake exercise to ascertain as to whether such promotions were not made due to non-availability of vacancies for promotion or for want of non-availability of eligible civil servants. In case of Government of Punjab through Secretary Education and another Versus Rana Ghulam Sarwar Khan and 111 others reported as 1997-SCMR-515, the August Supreme Court of Pakistan has observed that delay in making promotion occurring due to failure of department in carrying out

  
31.08.16

simple exercise within a reasonable period would not justify setting aside the judgment of Punjab Service Tribunal directing the Government to promote civil servants from specified date. In case of WAPDA Lahore through its Chairman and others Versus Haji Abdul Aziz and others reported as 2012-SCMR-965 (Supreme Court of Pakistan) it was observed that amendment in rules affecting seniority of employees would not be given retrospective effect to the dis-advantage of employees who were entitled to promotion prior to the amendment against vacancies available at that time. In the case of Muhammad Amjad and others Versus Dr. Israr Ahmad and others reported as 2010-PLC (C.S) 760 (Supreme Court of Pakistan) it was observed by the August Supreme Court of Pakistan that State functionaries were mandated to act with certain amount of reasonableness. It was also observed that a civil servant was eligible to be considered for promotion when substantive vacancy in promotion quota was available. The August Supreme Court of Pakistan declined to interfere in the judgment passed by the Service Tribunal wherein authorities were directed to consider case of promotion of concerned civil servant from the date when vacancy in his quota was available. In case of Engineer Musharaf Shah Versus Government of Khyber Pakhtunkhwa through Chief Secretary and 2 others reported as 2015-PLC(C.S)215 (Peshawar High Court) it was observed that a civil servant had a right to be considered for promotion and refusal of such right of petitioners of consideration for promotion is to be deemed as a final order. In

~~31.08.16~~

case of Hafiz Sanauallah Versus Director (Admn) Power-II, WAPDA, Lahore and another reported as 2009-PLC (C.S) 178 (Federal Service Tribunal) it was observed that the prayer of the appellant seeking move-over w.e.f. 1.12.1986 through service appeal instituted on 13.09.2000 was maintainable as the appellant was having continuous cause of action as he stood deprived of extension of his pay by move-over and a fresh cause of action was accruing in his favour every month. In case of Muhammad Hasnain Shah Versus the Deputy Inspector General of Police, Multan Range and 27 others reported as 2002-PLC (C.S) 1388 (Punjab Service Tribunal) it was observed that in matter of promotion and other emoluments cause of action was recurring and limitation would therefore not fore-close such right.


9. Since the new rules were promulgated vide notification dated 13.11.2012 and, therefore, in view of the case-law discussed above such rules cannot be given retrospective effect. Therefore such rules cannot be applied to civil servant having legitimate expectancy of consideration for promotion against a vacant post available for promotion prior to the date of promulgation of the said rules. It is also made clear from the cases-law referred to above that un-reasonable delay on the part of the department in conducting fairly simple exercise within reasonable period would not deprive a civil servant from his right of consideration for promotion from a specified date. We therefore, hold that delay spreading over a period of more than

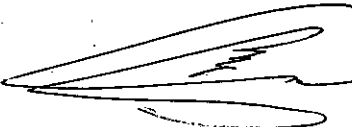
31.08.16

7 years would not deprive the appellant from seeking consideration for promotion from a specified date i.e. a date when vacancy for promotion has become available..

10. Withholding or delaying the process of promotion would neither entitle the respondents to agitate the plea of limitation nor, such a delay, would deprive the appellant from claiming his right for consideration for promotion more particularly when such a claim is based on a recurring and continuous cause of action.

11. In the light of the afore-stated discussion we are constrained to accept the present appeal and direct the respondents to consider the case of the appellant for promotion and in case he is found eligible for promotion against a seat available for promotion on a date prior to promulgation of new rules notified vide order dated 13.11.2012 then appellant shall be considered for promotion against such vacancy in the light of rules in vogue at the relevant time. Parties are left to bear their own costs. File be consigned to the record room.

  
(Muhammad Azim Khan Afridi)  
Chairman

  
(Pir Bakhsh Shah)  
Member

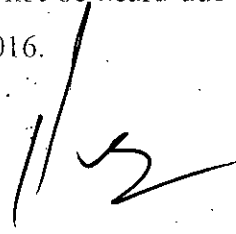
ANNOUNCED

31.08.2016

19.5.2016

Agent to counsel for the appellant and Addl. AG for respondents present. Arguments could not be heard due to strike of the bar. To come up for arguments on 9.6.2016.

Member



Member



9.6.2016

Agent to counsel for the appellant and Assistant AG for respondents present. Arguments could not be heard due to strike of the bar. To come up for arguments on 26.7.2016.

Member



Member




26.07.2016

Counsel for the appellant and Addl: AG for respondents present. Counsel for the appellant requested for adjournment. The case is adjourned. To come up for arguments on 31.08.2016.

Member



Member



26.10.2015

Counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) and Raham Taj, ADO alongwith Assistant AG for respondents present. Written statement submitted. The appeal is assigned to D.B for rejoinder and final hearing for 10.02.2016.

  
Chairman

10.02.2016

Counsel for the appellant and Asst. AG for respondents present. Rejoinder submitted on behalf of the appellant which is placed on file. To come up for arguments on 14.4.2016.

  
MEMBER.

  
MEMBER

14.04.2016

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 19.05.2016.

  
Member

  
Member



17.04.2015

None present for appellant. The appeal be relisted for preliminary hearing for 30.04.2015 before S.B.

  
Chairman

30.04.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as CT since 1989 and became entitled to promotion in 1993 when he secured the qualification of B.Ed. That junior to appellant have been promoted but the appellant has been ignored till date for one reason or the other despite his entitlement. The he preferred departmental appeal on 27.11.2014 which was not responded and hence the instant service appeal on 24.03.2015.

That the appellant is entitled to be considered for promotion and was ignored unjustly.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 29.07.2015 before S.B.

  
Chairman

29.07.2015

Counsel for the appellant, M/S Khurshid Khan, SO and Javed Ahmed, Supdt. alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 26.10.2015 before S.B.

  
Chairman



Appellant Deposited  
Security & Process Fee >



Form- A  
FORM OF ORDER SHEET

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

Case No. 323/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15.04.2015	<p style="text-align: center;">The appeal of Mr.Inayatullah resubmitted today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	15-4-15	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>17-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Inayatullah S.CT, GHS Payan Distt. Peshawar received to-day i.e. on 24.03.2015 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Annexures A and F of the appeal are illegible which may be replaced by legible/better one.
- 2- Copy of seniority list is not attached with the appeal which may be placed on it.
- 3- Annexures of the appeal may be attested.

No. 386 /S.T,

Dt. 25/3/2015.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Asif Yousafzai Adv. Pesh.

1. Annexure A and F is replaced by legible one, while Annexure F is made legible.
2. Copy of Seniority list is attached with appeal.
3. Annexures of the appeal are attested



**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

APPEAL NO. 323 /2015

Inayat Ullah

V/S

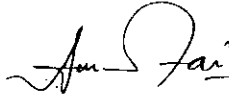
Education Deptt:


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S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	1-4
2.	Copy of appointment order	A	5
3.	BA degree	B	6
4.	MA degree	C	7
5.	B.Ed degree	D	8
6.	2004 promotion order	E	9 – 14
7.	Copy of rules of 2012.	F	15 – 26
8.	Promotion order 2014.	G	27 – 33
9.	Appeal.	H	34
10-	Vakalat nama	---	35

APPELLANT

THROUGH:

  
(M. ASIF YOUSAFZAI)

&   
(TAIMUR ALI KHAN)

ADVOCATES, PESHAWAR

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

APPEAL NO. 323 /2015

Mr. Inayat Ullah, S.CT,  
GHS Nasapa Payan, District, Peshawar.

**K.P. Province  
Service Tribunal**

Diary No 254

Dated 24-3-2015

(Appellant)

**VERSUS**

1. The Secretary Education (E&SE), Peshawar.
2. The Director Education (E&SE), Peshawar.
3. The Departmental Promotion Committee Through its Chairman, The Director Education (E&SE), Peshawar.
4. The District Education Officer (E&SE), Peshawar.

(Respondents)

-----

Filed to the  
*[Signature]*  
24/3/15

APPEAL UNDER SEC- 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION TO SST(G) POST ON THE BASIS OF BATCH- WISE/YEAR -WISE MERIT OR ON THE BASIS OF PROVINCIAL-WISE SENIORITY AGAINST 40% SHARE FIXED BY THE GOVERNMENT FROM THE DUE WITH ALL BACK AND CONSEQUENTIAL BENEFITS AND NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.

Submitted to the  
Registrar  
*[Signature]*  
24/3/15

**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO SST(G) POST FROM HIS DUE DATE ON THE BASIS OF BATCH-WISE/ YEAR-WISE MERIT OR ON THE BASIS OF PROVINCIAL-WISE SENIORITY AGAINST 40% QUOTA FIXED BY THE GOVERNMENT WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER THAT MAY ALSO BE GRANTED IN FAVOUR OF THE APPELLANT.

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant joined the education department ~~in 1989~~ on 4.10.1989 as CT teacher and performed his duties up to the entire satisfaction of his superiors and there are no complaint against the appellant. (Copy of appointment order is attached as Annexure-A)
2. That the appellant has passed B.A in 1987, MA (Islamiat) in 1992 and B.Ed in 1993. (Copy of degrees are attached as Annexure-B, C&D)
3. That the respondent Deptt: has passed promotion/appointment orders to SST/SET posts on batch-wise merit in the year 2004 and after that no order on the basis of batch-wise merit has been passed till 2012. Thus the appellant remained in waiting since long for his promotion as SST/SET on the basis of batch wise formula, which was an arbitrary act on the part of respondent Deptt: However the appellant agitated that matter but in vain and genuine request of the appellant went un-responded. (Copy of 2004 order is attached as Annexure-E)
4. That Govt: promulgated new rules in the year 2012 for promotion of SST(G) in which 40% quota was fixed by the Govt: for Promotion of SCT/CT to SST(G) and the promotion of SST(G) was made on basis those rules on 28.10.2014 but again the rules have not been followed in its true spirits because the SST is a provincial cadre post and requires to be filled in by provincial-wise seniority, whereas the

promotion order has been passed on the basis of Distt: wise seniority against the provincial cadre post. Thus once again the appellant has been kept deprived from his promotion rights despite having more than 30 years service at his credit. (Copy of rules and notification is attached as Annexure- F&G.)

5. That the appellant filed departmental appeal on 27.11.2014 for his grievance as he was deprived from his due right of promotion due to the promotion of SCT/CT to SST(G) on district base seniority, but the reply of the departmental appeal has not responded in statutory period. (Copy of departmental appeal is attached as Annexure-H).
6. That now the appellant comes to this august Tribunal on the following grounds amongst the others.

**GROUND:**

- A) That keeping the appellant deprive from his rights of promotion on the basis of batch-wise/year-wise merit since 2004 and again on the basis of following Distt:-wise seniority against the provincial cadre posts instead of provincial-wise seniority and not taking any action on the departmental appeal of appellant within statutory period is against the law, facts, norms of justice and material on record, therefore not tenable.
- B) That the appellant was discriminated as many of his batch mates were promoted on the basis of batch wise promotion, while the appellant was deprived from the same benefits.
- C) That promotion of SST(G) on the basis of district wise seniority is against the law as many juniors SCT/CT were promoted, while seniors SCT/CT were deprived from his legal right of promotion.
- D) That the promotion of SST(G) on district wise seniority is the violation of rules because the SST is a provincial cadre post and requires to be filled in on the basis of provincial-wise seniority but due to malafide the respondent passed the promotion order on the basis of Distt: wise seniority which is clearly violation of rules.

- E) That the promotion to SST(G) on district wise seniority is the violation of notification dated 13.11.2012.
- F) That the appellant has not been treated according to law and rules and has been kept deprived from the benefits of promotion in an arbitrary manner which is not permissible under the law and norms of justice.
- G) That the appellant seeks permission to advance other grounds and proofs at the time hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT

Inayat Ullah 

THROUGH:

  
(M. ASIF YOUSAFZAI)

&   
(TAIMUR ALI KHAN)

ADVOCATES, PESHAWAR



OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION (SCHOOLS) PESHAWAR DIV: PESH.  
 (APPOINTMENT)

A 5

Base copy

Appointment of the following persons is/are hereby ordered against the post of C.T. / on temporary and adhoc basis at Rs: 830/- PM Fixed plus usual allowance as admissible under the rules in P.P.S. No. 9. / (Rn           ) at the Institutions/Offices noted against each name.

S.No.	Name, Qualification and address	Posted at	Remarks.
1/-	Mr. Inayat Ullah B.A. B/C Haji Abdur Rauf Village & P.O Mahaqi, Tehsil: Distt: Pesh.	GHS, Mahaqi.	Against Vacant Post C.T.

Appointment order issued vide this office Endst: No: 71004-40 dated 17/9/1989 at s/n 2 is hereby cancelled.

TERMS AND CONDITIONS/

1. Her appointment is purely temporary and liable to termination any time without any assigning/reasons or notice.
2. In case of resignation they/She will have to submit one Month's prior notice to the Department or forfeit on Month's pay in lieu thereof to the Government.
3. She/They/is/are required to produce Health and Age Certificates from the Medical authorities concerned before taking over charge, provide they are not in Government Service.
4. She/They not be allowed to take over charge if her/their age is/are less than 18 years or above 25 years.
5. Her/Their appointment is/are subject to further condition that she/they is/are domicile of N.W.F.P.
6. Her/Their antecedents forms should be obtained duly verified by the Local Police authorities and submit to this office together with application for appointment on prescribed form and under taking declaration of moveable and immoveable property for record in this office.
7. All Original Educational Character and Domicile Certificates should be thoroughly checked before handing over charge if necessary it should be verified from the Institutions concerned.
8. If she/they fails to take over charge of the post of within a week of the receipt of these orders, the offer of appointment shall stand cancelled.
9. Charge reports should be submitted to all concerned.
10. No T.D. is allowed.
11. She/They should be given test in Nazira Quran and Pakistan Studies and result intimated to this office.

(ABDUL WAHAB KHAN)  
 (BURKAT KHAN),  
 Director of Education (Schools),  
 Peshawar Division Peshawar.

Endst: No. 9656-61 / F.No. H.2 / DEO/ 12-AE / Dated Peshawar the 4/11/89.

Copy for information and necessary action to the; -  
 District Education Officer (Male) Peshawar.

2. ~~Sub-Divisional Education Officer (Female)~~
3. ~~Advisor to Chief Minister for Education Govt: of P.F.P., Peshawar w/r to his order dated 2/10/1989.~~
3. ~~Headmaster, GHS, Mahaqi (Peshawar) w/r to his memo No. 234 dated 3/10/89.~~
4. ~~Supdt: Establishment Branch.~~
5. Candidate Concerned.
6. ~~Personal File.~~
6. ~~Candidate concerned.~~

*[Signature]*  
 D.D.N.  
 Director of Education (Schools),  
 Peshawar Division Peshawar.

against the post of C.T. / on temporary and adhoc basis at Rs: 370/-

A 5

PM Fixed plus usual allowance as admissible under the rules in P.P.S. No. 9. / (R... ) at the Institutions/Offices noted against each name.

S.No	Name, Qualification and address	Posted at	Remarks.
1/-	Mr. Ayaz Khan B.A. / O Haji Sader Hanf, Village P.O. Halaqi, Tehsil: Distt: Peshawar	GHS, Halaqi.	Against Vacant Post C.T.

Appointment order issued vide this office Erdsstt Nos: 71004-40 dated 17/3/1989 at S-16 is hereby cancelled.

TERMS AND CONDITIONS

1. His appointment is purely temporary and liable to termination any time without any assigning/reasons or notice.
2. In case of resignation they/she will have to submit one Month's prior notice to the Department or forfeit one Month's pay in lieu thereof to the Government.
3. He/She/They/It are required to produce Health and Age Certificates from the Medical authorities concerned before taking over charge, provide they are not in Government Service.
4. She/They not be allowed to take over charge if her/their age is/are less than 18 years or above 35 years.
5. Her/His appointment is/are subject to further condition that s/he/they is/are holder of G.W.F.P.
6. Her/Their antecedents forms should be obtained duly verified by the Local Police authorities and submit to this office together with application for appointment on prescribed form and under taking declaration of movable and immovable property for record in this office.
7. All Original Educational Character and Domicile Certificates should be thorough checked before handing over charge if necessary it should be verified from the Institutions concerned.
8. If s/he/they fails to take over charge of the post of within a week of the receipt of these orders, the offer of appointment shall stand cancelled.
9. Charge reports should be submitted to all concerned.
10. He/She/It is allowed.
11. She/They should be given test in Nazira Quran and Pakistan Studies and result intimated to this office.

(ABDUL QAJAR KHAN)  
(BUREAUKRILAN),  
Director of Education (Schools),  
Peshawar Division Peshawar.

9656 61

Erdsstt: K. A. / R.No. K. A. / DOE / 1220 / 11 / A. B. / Dated Peshawar the 4/4/89

Copy of information and necessary action to the; -  
District Education Officer (Male) Peshawar.

1. District Education Officer (Female)
2. Adviser to Chief Minister for Education Govt. of NWFP, Peshawar w/r to his order dated 2/10/1989.
3. Headmaster, GHS, Halaqi (Peshawar) w/r to his order No. 530401 dated 3/10/89.
4. Supdt. Establishment, Branch: 5. Candidate Concerned.
6. Candidate concerned

attested  
Headmaster  
& Nasapa Peshawar

Director of Education (Schools)

ATTESTED

# DIRECTORATE OF SCHOOLS AND LITERACY NWFP PESHAWAR

## ORDER

Consequent upon the recommendation of the Departmental Selection Committee, the Director Schools and Literacy NWFP Peshawar is pleased to appoint the following Candidates as S.E.T (General) on REGULAR BASIS in BPS-16 (Rs. 3805-295-12655) plus usual allowances as admissible under the rules with effect from 1/9/2004 and post them in the Schools noted against their names.

Session:	1986	Category:	General			
1	Ashfaq Ahmad Sakhawat Shah Regular	SET, GMS Anambar	GMS Anambar Swabi	SWABI	Regular	Post Already Occupied
				47.71		
Session:	1990	Category:	General			
2	Halim Khan Afridi Khan Regular	PET GMS Sarband	GHS Khararai Buner	MARDAN	Regular	Vacant Post
				49.74		
Session:	1991	Category:	General			
3	S. Qiamud Din M. Fazal Din Regular	CT GHS Rustam	GHS Battai Buner	MARDAN	Regular	Vacant Post
				52.15		
4	Muhammad Nisar M. Ghafoor Regular	CT, GHS Hund	GHS Baghbanpura Nowshera	SWABI	Regular	Vacant Post
				48.07		
5	Zubair Ahmad M. Naseer Shah Regular	PTC GPS Platoo	GHS Katkala Buner	MARDAN	Regular	Vacant Post
				47.84		
6	Gul Muhd Zarqand Khan Regular	PTC Orakzai Agency	GHS Dakada Buner	MARDAN	Regular	Vacant Post
				43.80		
7	Nasrullah S. Ishaq Ullah Regular	CT GHS Maryamzai	GHS Maryamzai Peshawar	CHARSADDA	Regular	Vacant Post
				43.39		
8	Shakir Ullah Khan Pur Regular	PTC GPS Guli Bgah	GHS Khararai Bunir	MARDAN	Regular	Vacant Post
				40.13		
9	Lal Bahader Ali Bahader Regular	CT, GHS Qadra	GHS Ganshal Buner	SWABI	Regular	Vacant Post
				39.36		
10	Jaffar Shah Abdul Sattar Regular	CT GHSS Kattang	GHS Ghazi Kote Buner	MARDAN	Regular	Vacant Post
				32.25		
Session:	1992	Category:	General			
11	Ali Sarwar Lal Hussain Regular	OT GHS No1 NSR Cant	GHS Jabbi Nowshera	NOWSHERA	Regular	Vacant Post
				54.20		
12	Said Bahadur Muqtadin	PTC GPS Shaidu	GHS Khaisarai Nowshera	NOWSHERA	Regular	Vacant Post
				51.71		
13	Muht Farooq Muht Hanif Regular					
				50.47		

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar

(Pakistan)

Session ANNUAL 1986

INAYAT ULLAH /

SON

of

H. ABDUR RAUF /

and a student

PESHAWAR DISTRICT /

of

having passed the prescribed Examination

held in OCTOBER 1986, is this day admitted by the University of Peshawar,

to the Degree of

## Bachelor of Arts

in the

SECOND

Division

The Examination was taken as ~~a whole~~ / in parts

Serial No 009038

Registered No 85-PAF16344 /

Roll No. 4739 /

Result Declared on 6TH APRIL 1987



*Shakul Ahmad*

Registrar

Countersigned

*Ullah*  
Vice-Chancellor

B 6

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# University of Peshawar

(Pakistan)

Session ANNUAL 1991

INAYAT ULLAH

SON of

HAJI ABDUR RAUF

and a Student

DISTRICT PESHAWAR

of \_\_\_\_\_ having passed the prescribed Examination held in APRIL, 1992, is this day admitted by the University of Peshawar,

to the Degree of

## Master of Arts

in the SECOND Division

The Subject of Examination being ISLAMIYAT

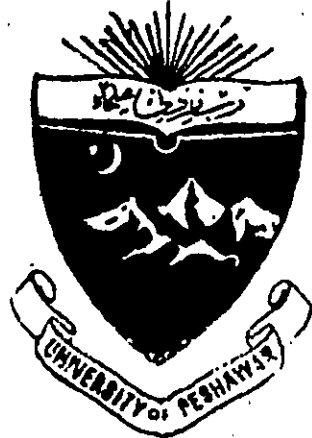
The Examination was taken as a whole / in parts

Serial No 011966

Registered No. 85-P/A-16344

Roll No. 16093

Result Declared on NOVEMBER 4, 1992



*Shakul Ahmad*  
Registrar

Countersigned  
*Zunni*  
Vice-Chancellor

52 (7)

Roll No. 6258609

D 2875 8  
نمبر شمار

# Allama Iqbal Open University



علامہ اقبال اوپن یونیورسٹی

INAYAT ULLAH Regn. No. 90-NFR-1025 رجب علیش نمبر عنایت اللہ

son/daughter of ABDUR RAUF عبد الرؤف بنت

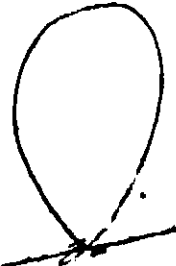
having completed the prescribed requirements ۱۹۹۲ میں مطلوبہ شرائط مکمل کرنے پر  
in Spring, 1992 is awarded the degree of

## Bachelor of Education


بی۔ ایڈ

She secured 55% marks and was placed ۵۲ فیصد نمبر لے کر سی گریڈ حاصل کیا۔  
in the first grade.

This degree is to be read in conjunction with the Transcript, bearing details of courses passed, issued separately.

  
Vice Chancellor دانش پائسر

Lahore  
dated: 29TH APR, 1993.

  
Controller of Examinations

سلام آباد

10

14	Muhd Ibrahim Muhd Rasool Regular	CT GHS G.D.Zai	GHS Chakarkot Kohat	MARDAN	Regular	Vacant Post
				50.41		
15	Muhd Israeel H.Abdul Ghafoor Regular	CT GHS Hoti Landaki	GMS Kohl Matta Khan Kohat	MARDAN	Regular	Vacant Post
				50.41		
16	Wazir Muhd: Sultan Muhd: Regular	DM GHS Rashidghari	GHS Sherkira Peshawar	<b>PESHAWAR</b>	Regular	Vacant Post
				50.23		
17	Tauheed Iqbal Hakeem Khan Regular	CT.GHS G.Munara	GHS Nizampur Nowshera	SWABI	Regular	Vacant Post
				50.15		
18	Nasib Zada Payaw Khan Regular	CT GHS N.Kili	GHS Marri Payan Kohat	MARDAN	Regular	Vacant Post
				49.72		
19	S.M Sadiq S.A Qadeem Regular	GHS Khesghi Bala	GHS Pir Sabaq Nowshera	NOWSHERA	Regular	Vacant Post
				49.36		
20	Fakhrul Islam Karam Baz Regular	CT GMS Zor Abad	GHS Khadezai Kohat	MARDAN	Regular	Vacant Post
				48.99		
21	Midrar Ullah Hamid Ullah Regular	CT GMS Daulat Pura	GHS Ahmad Khel Peshawar	CHARSADDA	Regular	Vacant Post
				48.97		
22	Ghayur Khan Saadat Khan Regular	PTC GPS Dalazak	GMS Mohammad Gul Killi Peshawar	<b>PESHAWAR</b>	Regular	Vacant Post
				48.94		
23	Badshah Said Radi Gul Regular	CT GMS Sarfaraz Koroona	GHS Gandiali Payan Kohat	MARDAN	Regular	Vacant Post
				48.00		
24	Khair Afzal Radi Gul Regular	CT GHS Pabbi	GHS Jaroba Nowshera	NOWSHERA	Regular	Vacant Post
				47.19		
25	Taj Muhammad Gul Muhammad Regular	CT GHS Guli Bagh	GMS Chalemdri Bunir	MARDAN	Regular	Vacant Post
				46.71		
26	Afsar Mohd Khan Mohd Regular	CT GHSS Nizam Pur	GMS Garu Nowshera	NOWSHERA	Regular	Vacant Post
				46.14		
27	Said Khan Saifur Khan Regular	CT.GHS Haryan	GHS Tora Stana Kohat	SWABI	Regular	Vacant Post
				42.73		
28	Mirza Ali Khan Subhanud Din Regular	CT GMS Baghdada	GHSS Z.K.K.Sahib Nowshera	MARDAN	Regular	Vacant Post
				41.62		
29	Sultanul Arifin Ahmad Jan Regular	CT GHS-Gaddar	GHS Lal Garhi Kohat	MARDAN	Regular	Vacant Post
				36.76		

Session:

1993

Category:

General

ATTESTED

11

30	Muhtaram Shah Muzafer Shah Regular	CT GMS Kurvi	GHS Ali baig Nowshera	NOWSHERA	Regular	Vacant Post
				57.61		
31	Shahras Khan Nawab Khan Regular	CT,GHS S.Khan-1	GHS Ghazi kot Bunir	SWABI	Regular	Vacant Post
				57.19		
32	Ibadullah Aziz ur Rahman Regular	CT GHSS Turnab	GHS Masho Gagar Peshawar	CHARSADDA	Regular	Vacant Post
				57.10		
33	Khalista Gul Zar Gul Regular	CT GHS Shaidu	GHS Shaidu Nowshera	NOWSHERA	Regular	Vacant Post
				56.91		
34	Ikhtlar Zaman Arab Gul Regular	CT GHS Shahcot(NSR)	GHS Pahari Kati Khel Nowshera	NOWSHERA	Regular	Vacant Post
				56.74		
35	Muhamad Ayaz Parwarish Regular	CT,GHS-1 S.Khan	GMS Palosi Nowshera	SWABI	Regular	Vacant Post
				56.46		
36	Akram Suhail H.Akbar Regular	CT GMS Wattar	GMS Watter Nowshera	NOWSHERA	Regular	Vacant Post
				56.34		
37	S. Muhd: Raza S.M. BasitShah Regular	CT GMS Passani	GMS Banda bazid Khel Peshawar	PESHAWAR	Regular	Vacant Post
				56.19		
38	S. Zulfiqar Ali Shah Said Badshah Regular	CT GHS AC (NSR)	GMS Walai Nowshera	NOWSHERA	Regular	Vacant Post
				56.08		
39	Shah Nawaz Anwar Khan Regular	CT GHSS-3 Pesh: City	GHS Barbar Opazai Peshawar	CHARSADDA	Regular	Vacant Post
				55.77		
40	Fazli Hadi Akhtar Biland Regular	CT GHSS No1City	GHS Kafoor Dheri Peshawar	PESHAWAR	Regular	Vacant Post
				55.72		
41	Said Ul Amin Mohd Afzal Regular	GMS M.aman Korona	GMS Zara Maina Nowshera	NOWSHERA	Regular	Vacant Post
				55.69		
42	Muhd Irshad Zarfarosh Khan Regular	CT GHSS Kattlang	GCMHS Dir	MARDAN	Regular	Vacant Post
				55.56		
43	Mohd. Amin Mobin Khan Regular	DM GHS Zakhai Qabristan	GHS Mali Khela Nowshera	NOWSHERA	Regular	Vacant Post
				55.51		
44	Abdur Rashid Muhib Ullah Regular	CT,GHS Jehangira	GHS Jehangira Road Nowshera	SWABI	Regular	Vacant Post
				55.46		
45	Mohd;Saleem Rafiuddin Regular	CT GHS Babra	GHS Dhoda Kohat	CHARSADDA	Regular	Vacant Post
				55.40		

ATTESTED



12

46	Ahimad Saeed Hidayat ur Rahman Regular	CT GHS MMKhel -2	GHS Gul Bela Peshawar	CHARSADDA	Regular	Vacant Post
				55.17		
47	Muhammad Dost Firdus Khan Regular	CT GHS Aza khel bala	GHS Daji Banda Nowshera	NOWSHERA	Regular	Vacant Post
				55.09		
48	Anwar Ali Shah Munfariq Shah Regular	PTC GPS No.2 S/Dher	GHS Jabbi Nowshera	MARDAN	Regular	Vacant Post
				55.01		
49	Fazal Ihsan Dilawar Khan Regular	CT,GHS Kunda	GMS Malikpur Kohat	SWABI	Regular	Vacant Post
				54.89		
50	Azizur Rehman M.Hazrat Hussain Regular	CT,GHS Mansabdar	GMS Gararai Bunir	SWABI	Regular	Vacant Post
				54.88		
51	Noorul Basar Zulqadar Regular	CT,GHS M.Payan	GHS Nogram Bunir	SWABI	Regular	Vacant Post
				54.86		
52	Mir Badshah Mir Nawaz Khan Regular	CT GHS kheski payan	GHSS Khair Abad Nowshera	NOWSHERA	Regular	Vacant Post
				54.80		
53	S. Nazar Ali S. ZafarAli Sh: Regular	CT GHS Gulbahar	GMS Jani Garhi Peshawar	PESHAWAR	Regular	Vacant Post
				54.79		
54	Fazli Amin Gul Zada Regular	CT,GHS Malak Abad	GHS No.2 Daggar Bunir	SWABI	Regular	Vacant Post
				54.64		
55	Ghani Rehman Amir Khan Regular	CT,GHS Adina	GMS Khushal Garh Kohat	SWABI	Regular	Vacant Post
				54.62		
56	Muhammad Nazir Gul Zareen Regular	CT GHS shaidu	GHS Marooba Nowshera	NOWSHERA	Regular	Vacant Post
				54.61		
57	Javed Khan Sheereen Khan Regular	CT GHS samander Garhi	GHS AC Centre Nowshera	NOWSHERA	Regular	Vacant Post
				54.54		
58	Atam Zeb Afsar Khan Regular	CT GHS Sher Garh	GHSS Billitang Kohat	MARDAN	Regular	Vacant Post
				54.49		
59	Mohd;Ibrahim Wahid Gul Regular	PTC GPS Umerabad	GHS Saib Kohat	CHARSADDA	Regular	Vacant Post
				54.49		
60	Eesar Ali Mukhityar Khan Regular	CT GMS Suhbat Abad	GMS Sohbat Abad Mardan	MARDAN	Regular	Vacant Post
				54.47		
61	Pervez Khan Zarfarosh Khan Regular	PTC GPS Babuzai	GHS Jabbi Nowshera	MARDAN	Regular	Vacant Post
				54.45		

ATTESTED

13

62	M. Ismail Maftah uddin Regular	AT GHS Prang	GHS Nandraka Kohat	CHARSADDA Regular	54.38	Vacant Post
63	Zaheer All Rahim Shah Regular	GHS 4 City	GHS Badaber Peshawar	PESHAWAR Regular	54.37	Vacant Post
64	Hamd Ullah Jan Mohd; Ullah Regular	CT GMS Kaniwar	GHS Gumbat Kohat	CHARSADDA Regular	54.26	Vacant Post
65	Mian Nusrat Shah Ktk Mian Hazrat Gul Late Regular	ptc GPS No. 6 DI khel NSR	GHS Kotli Nowshera	NOWSHERA Regular	54.17	Vacant Post
66	Jamshed Khan Nazar Gul Regular	CT GHS Fathma	GMS Kamar Kohat	MARDAN Regular	54.05	Vacant Post
67	S. Maqsood All Shah S. Amir Badshah Regular	CT GHS NSR Kalan No. 1	GHS Khairabad Nowshera	NOWSHERA Regular	53.79	Vacant Post
68	S. Farid Ullah S. Iraq shah Regular	CT GHS 3 Pesh Cantt	GMS Sama Badaber Peshawar.	PESHAWAR Regular	53.77	Vacant Post
69	Muhd Saleem Ashrafud Din Regular	PTC GPS No. Zando Dheri	GHS Barh Kohat	MARDAN Regular	53.53	Vacant Post
70	Nazar Mohd; Abdul Ghani Regular	CT GHS Ibrahimizmai	GHS Nakband Kohat	CHARSADDA Regular	53.52	Vacant Post
71	Haji Muhammad H. Sher Muhd: Regular	DM GHS MMKhel-2	GHS Mathra Peshawar.	CHARSADDA Regular	53.51	Vacant Post
72	Sardar All Abdul Latif Regular	PTC GPS No.2 Mayar	GMS Khawajakhel Kohat	MARDAN Regular	53.49	Vacant Post
73	Naveed Alam Mukhtiar Shah Regular	GHS D.I.K. Nowshera	GHS Jaba Khushk Nowshera	NOWSHERA Regular	53.45	Vacant Post
74	Mukhtaram Mohd; Zaman Regular	PTC GPS M.M.Khel	GMS Chisham Ghunda Kohat	CHARSADDA Regular	53.27	Vacant Post
75	Niaz Amin Khair Muhd: Regular	PTC GPS Dinbahar	GHS Aza khel Mattani Peshawar	PESHAWAR Regular	53.25	Vacant Post
76	Abdul Wakeel Nimal Wakeel Regular	PTC GPS A.Gul Kili	GMS Tolang Jadeed Kohat	MARDAN Regular	53.22	Vacant Post
77	Javed Gul Hameed Regular	CT GMS Pesh Cantt	GHS Surezai Peshawar	PESHAWAR Regular	53.20	Vacant Post

ATTESTED

78	M. Wisal Muhd; Younas Regular	PTC GPS Qazi Khel	GHS Ghorzai Payan Kohat	CHARSADDA Regular 53.17	Vacant Post <b>14</b>
79	M. Iqbal Dawud Khan Regular	CT.GMS-1 Tordhor	GHS Gandlail Payan Kohat	SWABI Regular 53.13	Vacant Post
80	Shamsularifin Abdul Sattar Regular	PTCGPSCH:pura	GHS G.Ghulam shah Peshawar	<b>PESHAWAR</b> Regular 52.83	Vacant Post
81	Yousaf Khan Mohd; Iqbal Regular	CT GMS Turangzai	GHS Chakarkot Bala Kohat	CHARSADDA Regular 52.77	Vacant Post
82	Ahmad Din Awal Din Regular	CT GHS jehangira Road	GHS Jehangira Road Nowshera	NOWSHERA Regular 52.76	Vacant Post

### TERMS AND CONDITIONS OF THEIR APPOINTMENTS

1. They will be governed by such rules and regulations as may be prescribed from time to time by the Govt. for the category of the Govt. servants to whom they belong.
2. Their services will be liable to termination on one month's prior notice from either side. In case of resignation without prior notice, their one month's pay with allowances, shall be forfeited to Government
3. They will take over charge within TWO WEEKS and compliance reported to this Directorate.
4. Their inter-se-seniority will be determined in accordance with the merit fixed by the Departmental Selection Committee.
5. They shall be on probation for a period of two years.
6. The EDOs concerned should ensure that the newly appointed SETs had been working on regular basis on their previous posts and not on Contract Basis before their taking over of charge as SET.
7. They shall required to furnish copies of all their certificates/degrees alongwith the original receipts and photo copies thereof pertaining to the verification fee of the concerned examining body (Board/University) to the EDOs (SL) concerned. The later shall arrange verification of all the certificates/degrees of the appointee of their respective District and will issue a clearance certificate to each appointee for the release of his/her pay. His/her pay bill should not be submitted to the District Accounts Office concerned before verification of all certificates/degrees from the concerned institution of each candidate.
8. No TA/DA etc. is allowed.
9. Charge report should be submitted (in duplicate) to all concerned.

(SHAMAS KHAN)  
DIRECTOR

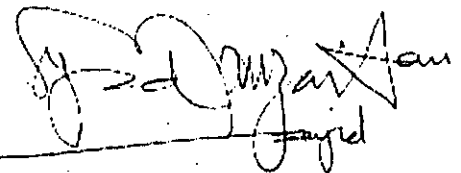
F.No. 151/A-14/SET (MF) Appointments-2004/DSL/AD Estab-I.

Endst:No. 3444-3620 /

Dated Peshawar the 31/ 08 /2004.

Copy forwarded to the: -

1. Executive Disteict Officers Concerned.
2. District Accounts Officers concerned.
3. Deputy District Officers (Male and Female) concerned.
4. Principals/Headmaster/Headmistresses of school concerned
5. Section Officer (Schools) Govt of NWFP Schools and Literacy Department Peshawar.
6. PS to Minister for Education NWFP Peshawar.
7. PS to Secretary to Govt of NWFP Schools and Literacy Department Peshawa
9. Candidates concerned.
10. PA to Director Schools and Literacy NWFP Peshawar.



(Syed Manzar Jan Sajid)  
Deputy Director (Establishment)

**ATTESTED**



GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Endst. No. & Date as above.

Copy forwarded to:-

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

① violation of batch wise  
 ② also violated. 2012 policy of 1/12/30  
 ③ - provincial cadre violated and restricted to 01800 was J-1  
 ④ - zone wise allotment was J-1  
 required. U290

ATTESTED



4 F (15) (25)

KPK

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

*Peshawar, dated the November 13, 2012.*

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Endst. No. & Date as above.

Copy forwarded to:-

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

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

**ATTESTED**

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

KPK

JJ

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*[Handwritten signature]*

Section Officer (Primary)

(17)

ATTESTED

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APPENDIX

No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16).	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or  (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:  (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3;  (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3;  (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;

*KPK - Jibir*

**ATTESTED**

(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and

(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No. 3; and

(b) fifty per cent by initial recruitment.

By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.

By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.

By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

KPK- [Handwritten signature]

[Handwritten initials]

- 2. Senior Arabic Teacher (SAT) (BPS-16)
- 3. Senior Theology Teacher (STT) (B-16).
- 4. Senior Certified Teacher (SCT)(General) (BPS-16).

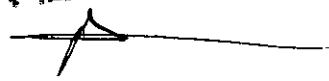
ATTESTED

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

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Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris: or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11. Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Daroshi Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
12. Senior Qari (BPS -15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
13. Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

ATTESTED

Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.

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

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

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

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11. Certified Teacher (Industrial Arts) (BPS-15).

(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or

18 to 35 years.

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

(b) Bachelor's Degree from a recognized

ATTESTED

	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>5. Certified Teacher (Agriculture) (BPS-15)</p>	<p>(i) Bachelor's Degree from a recognized University with one-year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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

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18.	Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
19.	Primary School Head Teacher (PSHT) (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

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**ATTESTED**  
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## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PII No. 091-9210389, 9210938,  
9210437, 9210957, 9210468

Fax 091-9210936, 0800-33857

E-mail rafiq\_kk851@yahoo.com

### 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 24<sup>th</sup> July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/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.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned on "School based".

#### A. SST (Bio-Chem)

##### 1. PROMOTION OF SCT/CT TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	43
25% share initial recruitment	11
75% share for Promotion.	32
40 % Share of promotion of SCT/CT	(17)
Posts available for promotion	17
Promoted through this order	11

S.N	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	122	Abdul Sattar Khan	GHS Bela Baramad Khel	02/02/1967	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Bio-Chem) post on school based.
2	154	Misal Khan	GCMHSS Nahaqi	20/02/1966	-----do-----
3	341	Amir Said	GHS Rasheed Garhi	09/10/1972	-----do-----
4	423	Bilal Muhammad	GMS Takht Abad	26/02/1970	-----do-----
5	435	Jehan Zeb	GHS Dabgari Gate	15/04/1977	-----do-----
6	482	Fazal Muhammad	GCMHS Peshawar City	11/01/1972	-----do-----
7	485	Wajid Ali	GCMHS Peshawar City	15/02/1973	-----do-----
8	495	Imran Ullah	GMS Bashir Abad	01/05/1967	-----do-----
9	529	Abdur Rahman	GHS Urmer Maina	04/04/1966	-----do-----
10	545	Muhammad Irshad Anwar	GHS Sufaid Deri	14/04/1967	-----do-----
11	597	Salim Ullah Khan	GHSS Adezai	06/08/1981	-----do-----

##### 2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	43
25% share initial recruitment	11
75% share for Promotion.	32

*(Signature)*



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20 % Share of promotion of PSHT/SPST/PST	09
Posts available for promotion	09
Promoted through this order	09

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	1123	Waqar Ahmad	GPS Bashir Abad Pesh.	03/09/1972	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Bio-Chem) post on school based.
2	1368	Waheed Ullah	GPS Tarnab Farm No.2	3/13/1971	-----do-----
3	1574	Gohar Ali	GPS Mera Mattani	2/26/1970	-----do-----
4	1592	M. Intiaz Khattak	GPS Wazir Bagh 1	1/1/1968	-----do-----
5	1598	Shaukat Fatheh Ali	GPS Bada Ber No.1	4/1/1970	-----do-----
6	1807	Gohar Ali	GPS Haryana Payan	5/12/1969	-----do-----
7	1934	Sajjad Ali Shah	GPS Muhammad Zai	5/1/1971	-----do-----
8	1973	Wasifullah	GPS Awal Khan Koroona	11/1/1970	-----do-----
9	2026	Arshad Mehmud Shah	GPS Pakha Ghulam No.1	11/7/1974	-----do-----

### 3. PROMOTION OF SAT/AT TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	43
25% share initial recruitment	11
75% share for Promotion.	32
20 % Share of promotion of SDM/DM	02
Posts available for promotion	02
Promoted through this order	01

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	167	Abdur Raziq	GMS Garhi Chandan Bala	16/01/1980	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Bio-Chem) post on school based.

### B. SST (Phy-Maths)

#### 1. PROMOTION OF SCT/CT TO THE POST OF SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	55
25% share initial recruitment	14
75% share for Promotion.	41
40 % Share of promotion of SCT/CT	22
Posts available for promotion	22
Promoted through this order	21

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	75	Irshad Khan	GHS Sufaid Dheri	04/10/1963	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Phy-Maths) post on school based.
2	84	Sayar Muhammad	GHSS No.1 Peshawar City	02/05/1962	-----do-----
3	123	S Sajjad Ali	GHS Gulbahar	15/10/1970	-----do-----

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		Shah	No.2		
4	126	Syed Zafar Naeem Shah	GHS Hayat Abad	23/01/1967	-----do-----
5	232	Muhammad Anwar	GCMHS Peshawar City	10/10/1966	-----do-----
6	234	Alam Khan	GHSS No.1 Peshawar City	02/05/1970	-----do-----
7	245	Nisar Khan	GMS Sethian	16/03/1969	-----do-----
8	258	Bakhtiar Alam	GHS Hassan Garhi	17/04/1969	-----do-----
9	304	Ifikhar Ahmad	GMS Swati Gate	01/07/1971	-----do-----
10	306	Jan Nisar Khan	GMS Khazana Shugar Mill	11/09/1971	-----do-----
11	322	Naveed Iqbal	GHS Nanak Pura	01/11/1972	-----do-----
12	382	Ulas Khan	GHS Pakha Ghulam	20/04/1969	-----do-----
13	396(A)	Khalid Hameed Khan	GHS Mathra	05/04/1972	-----do-----
14	396(B)	Zahid Hussain	GHSS No.3 Peshawar city	22/10/1969	-----do-----
15	412	Muhammad Iqbal	GCMHSS Nahagi	15/10/1968	-----do-----
16	424	Muhammad Ishaq	GHS Tela Band	10/01/1971	-----do-----
17	487	Muhammad Hussain Shah	GMS Gunjj Mandi	16/07/1974	-----do-----
18	494	Abdullah	GHS Palosi Mughadarzai	05/03/1975	-----do-----
19	542	Kishwar Khalid	GHSS Daag	10/01/1975	-----do-----
20	566	Syed Shahid Hussain Shah	GHS Sufaid Deri	01/03/1969	-----do-----
21	595	Adil Noor	GHSS Chamkani	06/07/1976	-----do-----

**2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (Phy-Maths BPS-16.)**

Total No. of SST Phy-Maths (M) Posts vacant Posts	
25% share initial recruitment	55
75% share for Promotion.	14
20 % Share of promotion of PSHT/SPST/PST	41
Posts available for promotion	11
Promoted through this order	11

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	1739	Ijaz Ahmad	GPS G. Kander Khel	6/8/1972	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Phy-Maths) post on school based.
2	1616	Muhammad Iqbal	GPS Garhi Arsala Khan	15/04/1969	-----do-----
3	1824	Gulhar Ullah Jan	GPS M/F Jabba Jheel	1/1/1970	-----do-----
4	1883	Sami Ullah	GPS G. Sher Dad 1	2/3/1969	-----do-----
5	1999	Zafar Ali	GPS Mera Shahi Bala 1	1/8/1971	-----do-----

6	2016	Muqadar Khan	GPS No. 1 Nahaqi	01/06/1971	-----do-----
7	2130	Syed Inam Ullah	GPS G. Sher Dad 2	10/2/1973	-----do-----
8	2132	M Fayyaz	GPS Rural academy	3/31/1974	-----do-----
9	2149	Javed Iqbal	GPS Asia Gate	01/03/1976	-----do-----
10	2155	SAEED SHAH	GPS Dinbahar Colony 1	11/3/1973	-----do-----
11	2468	Abdul Qayyum	Shaheed Abad	1/6/1976	-----do-----

### 3. PROMOTION OF SDM/DM TO THE POST OF SST (Phy-Maths BPS-16).

Total No. of SST Phy-Maths (M) Posts vacant Posts	55
25% share initial recruitment	14
75% share for Promotion.	41
20 % Share of promotion of SDM/DM	03
Posts available for promotion	03
Promoted through this order	03

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	59	Zakir Ullah	GHS Charpriza	18/04/1971	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Phy-Maths) post on school based.
2	97	Abdul Salam	GHS G.Ghulam Shah	20/03/1970	-----do-----
3	98	Niaz Khan	GMS Din Bahar Colony Peshawar	08/02/1975	-----do-----

### 4. PROMOTION OF S Qari/Qari TO THE POST OF SST (Phy-Maths BPS-16).

Total No. of SST Phy-Maths (M) Posts vacant Posts	55
25% share initial recruitment	14
75% share for Promotion.	41
20 % Share of promotion of S Qari/Qari	02
Posts available for promotion	02
Promoted through this order	01

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	14	Jamil Ahmad	GHS Lakarai Kaniza	6/22/1964	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (Phy-Maths) post on school based.

### C. SST (General)

#### 1. PROMOTION OF SCT/CT TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	47
25% share initial recruitment	11
75% share for Promotion.	36
40 % Share of promotion of SCT/CT	20
Posts available for promotion	20
Promoted through this order	20

S.No	SLNo	Name of Official	Present Place of Posting	Date of Birth	Remarks

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1	8	Waris Khan	GCMHS Peshawar City	2/5/1962	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (General) post on school based.
2	9	Noor Islam	GHS No.3 Peshawar Cantt.	28/10/1962	-----do-----
3	10	Sahar Gul	GCMHS No.4 Peshawar City	01/01/1962	-----do-----
4	12	Amir Nawaz	GHS Masho Gagar	26/04/1960	-----do-----
5	15	Rozi Gul	GMS Kankola	15/08/1965	-----do-----
6	22	Gohar Ali	GHS Budhani	24/08/1958	-----do-----
7	16	Muhammad Zahir Shah	GTHSS Gulbahar	01/01/1962	-----do-----
8	24	Jamil Ahmad	GHSS Budhani	30/08/1961	-----do-----
9	25	Muqtadir Khan	GHSS Safaid Sung	05/07/1964	-----do-----
10	27	Sardar Khan	GHS Akhoon Abad	12/11/1955	-----do-----
11	28	Abdul Jabbar Khan	GHSS No.4 Peshawar City	16/09/1962	-----do-----
12	30	Shah Jehan Khan	GHS Mathra	01/10/1961	-----do-----
13	32(A)	Asmat Ullah	GHSS Musa Zai	11/12/1956	-----do-----
14	39	Fazlullah	GHS Budhani	17/05/1960	-----do-----
15	40	Rahmat Gul	GHS Matani	20/03/1962	-----do-----
16	41	Inayatullah	GHS Sardar Garhi	12/1/1963	-----do-----
17	42	Fazli Subhan	GHS No. 3 Peshawar Cantt	15/10/1960	-----do-----
18	43	Suliman Shah	GHS Gul Bela	02/10/1967	-----do-----
19	49	Iqbal Shah	GHSS No.1 Peshawar City	20/01/1958	-----do-----
20	53	Mir Zaman	GHS Urmer Maina	08/05/1958	-----do-----

## 2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	47
25% share initial recruitment	11
75% share for Promotion.	36
20 % Share of promotion of PSHT/SPST/PST	09
Posts available for promotion	09
Promoted through this order	08

S.No	SL No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	16	Abdul Qayyum	GPS Mullazai	3/25/1955	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (General) post on school based.
2	38	Muhammad Said	GPS Yakatoot	4/17/1955	-----do-----
3	134	Riaz Ahmad	GPS Zargar Abad	4/10/1963	-----do-----
4	192	M. Muzaffar Shah	GPS Machi Hatta	8/4/1963	-----do-----
5	204	Meskin Khan	GPS No.1 Fatu Abdur Rahima	06/04/1964	-----do-----
6	209	Faqir Gul	GPS Badi Koroona	10/03/1964	-----do-----
7	219	Amin Ullah	GPS Takht Abad 2	9/9/1957	-----do-----

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(32)

8	224	Amin Ul Haq	GPS Karimpura	9/3/1957	-----do-----
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## 3. PROMOTION OF SDM/DM TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	47
25% share initial recruitment	11
75% share for Promotion.	36
4 % Share of promotion of SDM/DM	02
Posts available for promotion	02
Promoted through this order	02

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	7	Rooallah Jan	GHS No.1 Peshawar City	01/04/1956	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (General) post on school based.
2	11	Gul Muhammad	GHS Rasheed Garhi	12/12/1963	-----do-----

## 4. PROMOTION OF SAT/AT TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	47
25% share initial recruitment	11
75% share for Promotion.	36
4 % Share of promotion of SAT/AT	02
Posts available for promotion	02
Promoted through this order	02

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	50(A)	Muhib Ur Rahman	GMS Palosi Atozi	14/09/1961	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (General) post on school based.
2	51	Noor Ul Haq	GHS Malogo	12/04/1967	-----do-----

## 5. PROMOTION OF STT/TT TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	47
25% share initial recruitment	11
75% share for Promotion.	36
4 % Share of promotion of STT/TT	02
Posts available for promotion	02
Promoted through this order	02

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	42	Hidayat Ur Rehman	GHS Rasheed Ghari	15/07/1972	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (General) post on school based.
2	71	Tariq Mehmood	GHS Gharib Abad	06/06/1974	-----do-----

## 6. PROMOTION OF S Qari/Qari TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	47
25% share initial recruitment	11
75% share for Promotion.	36
3 % Share of promotion of S Qari/Qari	02
Posts available for promotion	02
Promoted through this order	01

S.N	S.L.No	Name of Official	Present Place	Date of	Remarks
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ATTESTED

To be substituted with even No and date

SSTs (M) Peshawar.

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			of Posting	Birth	
1	43	Jamal Ud Din	R.I.T.E (M) Peshawar.	3/6/1974	Services placed at the disposal of DEO (M) Peshawar for further posting against SST (General) post on school based.
2	44	Kiramat ullah	GHS Jogiwara	20-10-1973	-----do-----

**Terms and conditions:-**

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based, They will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 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.

3371-75

Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 28/10/2014.  
Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned
3. District Accounts Officer concerned
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 (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

**ATTESTED**

- seniority list.

- (6)
- Total SET posts - province.
  - Share - 40%.
  - Rules.

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consideration for promotion  
on the basis of provincialwise  
seniority against 40% share  
and available post from  
due date.

بخدمت جناب سیکریٹری صاحب ایلیمینٹری اینڈ سیکنڈری ایجوکیشن صوبہ خیبر پختونخواہ پشاور۔

عنوان! اپیل برائے پروموشن بحیثیت SST(G).

جناب عالی:-

مودبانہ گزارش ہے۔ کہ میں مسمی عنایت اللہ S.CT گورنمنٹ ہائی سکول ناساپہ پایان ضلع پشاور آپ صاحبان کی خدمت میں اپنے حق تلفی کے متعلق چند گزارشات پیش کرتا ہوں۔

میں محکمہ تعلیم سکولز میں بحیثیت انٹرینڈ CT مورخہ 05-10-1989 کو تعینات ہوا۔ Appointment Order درخواست کے ساتھ لف ہے۔ میں نے 1992ء میں پشاور یونیورسٹی سے MA کی ڈگری حاصل کی اور مورخہ 29-04-1993 میں B.ed کی پروفیشنل کوالیفیکیشن حاصل کی۔ اور آج تک باقاعدہ اُستاد کی حیثیت سے خدمات انجام دیتا رہا ہوں۔ B.ed کوالیفیکیشن کے تحت محکمے کے Batchwise طریقہ کار کے مطابق SST پروموشن کا منتظر رہا ہوں۔

31-08-2004 میں Batchwise طریقہ کار کے تحت میرے Batch یعنی 1993ء کے B.ed کے حامل ان سروس آساتذہ جن کا تعلق کسی بھی کیڈر سے تھا۔ صوبائی سطح پر میرٹ کی بنیاد پر SST پروموشن سے مستفید ہوئے۔ اور میں بد قسمتی سے پوسٹوں کے ہوتے ہوئے پروموشن سے محروم رہا۔ اور آج 2004ء کے پروموٹ شدہ SST دس سال سروس پر گریڈ سترہ لے چکے ہیں۔ اکتوبر 2014 کو محکمے نے Batchwise طریقہ پروموشن کو یکدم ترک کر دیا۔ جس سے میں خصوصاً متاثر ہوا۔ کیا چھبیس سال کے طویل عرصہ ملازمت میں میرا پروموشن کا حق نہیں بنتا۔ میں اکیس سال قبل B.ed کر چکا ہوں اور اکتوبر 2014 کو ایک سال پہلے B.ed کرنے والوں کو پروموٹ کیا گیا۔ اگرچہ یہ B.ed اور صوبائی کیڈر کا پوسٹ ہے۔ اکتوبر 2014 میں SST کا جو پروموشن ہوا اس میں میرا حق تلف کر دیا گیا ہے۔ صوبائی سینیاریٹی کو ضلع تک محدود کی گئی ہے۔ اور دوسرے ضلعوں میں پوسٹ حاصل کر کے آساتذہ ضلع پشاور کو جوق در جوق ٹرانسفر کرتے ہیں۔ اور ضلع پشاور میں خالی آسامیوں کو پُر کرتے ہیں۔ جو اس ضلع کے آساتذہ کے ساتھ نا انصافی ہے۔ مختصر یہ کہ آپ صاحبان میرے ساتھ انصاف کا برتاؤ کریں۔ اور مجھے SST پوسٹ پر پروموٹ کرنے کے احکامات صادر فرمائیں۔

العارض

عنایت اللہ S.CT MA, B.ed گورنمنٹ ہائی سکول  
ناساپہ پایان ضلع پشاور۔

ATTESTED

Diary No 1372 dt 27-11-2014.

DS(11) 98/11



F/No 635

**Before The Honorable Service Tribunal KPK Peshawar**

Service Appeal No. 323/2015

Inayat Ullah V/S Govt

**Reply on behalf of the Respondents**

**Respectfully sheweth:-**

The Respondents submit as under:-

**Preliminary objections:**

1. That the Appellant has got no cause of action/ locus standi.
2. That the Appellant has been **ESTOPPED** by his own conduct.
3. That the instant appeal is badly time barred.
4. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary parties.
5. That the Appellant has not come to this Hon, able Tribunal with clean hands.
6. That this Hon' able Tribunal has got no jurisdictions to adjudication upon the instant appeal.
7. That the appellant is the beneficiary of the Recruitment / Promotion Policy 2012.
8. That the instant appeal is barred by law.
9. That the instant appeal is not maintainable in the present form.

**On Facts:**

1. That the Para-1 is correct to the extent that the appellant is the employee of Education Department while rest of the Para pertains to the personal record of the appellant, hence no comments.
2. That Para-2 also pertains to the personal record of the appellant, hence no comments.
3. That in the year 2012, the Govt of KPK, promulgated the Recruitment/Promotion Policy which provided clear cut service structure to the teacher community under which thousands of C.T Teacher have been promoted on the basis of seniority cum fitness and the appellant is also the beneficiary of the above said policy. (Policy is already attached with appeal and promotion order of the appellant is attached as annexure - A)

Furthermore, the appellant has no right to raise the issue of 2004 at present stage.

4. That the Recruitment / Promotion Policy 2012 has been followed by the Respondents in its true letter and spirit.

Furthermore, C.T teacher post is District cadre and the seniority List of the C.T teachers is prepared at District Level while rest of the Para is incorrect and denied.

5. That as the appellant having no cause of action, therefore, his Departmental appeal was not maintainable.
6. No comments.

**Grounds:-**

- A. That Ground – A is incorrect and denied. The appellant is the beneficiary of the policy in question.
- B. That Ground – B is incorrect and denied the Respondents have acted under law, rules and policy on the subject.
- C. That Ground – C is incorrect, misleading, hence denied. Moreover, though, SST is provincial cadre post but Promotion to SST post, the Seniority List is prepared at District level.
- D. That Ground – D replied in Ground – C.
- E. That Ground – E is incorrect, misleading, hence denied.

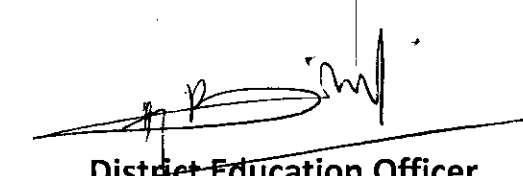
Moreover, Seniority List for promotion to SST post is prepared on District level.

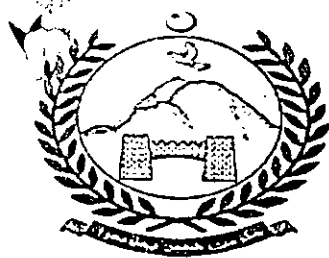
- F. That Ground – F is incorrect and denied. The appellant has been treated under the law, rules and policy.
- G. That the Respondents also seek leave of this Hon' able Tribunal to raise additional grounds and present case law at the time of arguments.

It is therefore, humbly prayed that on the acceptance of this Reply, the instant appeal may very kindly be dismissed with cost.

  
Secretary,  
KPK Peshawar

  
Director,  
(E & SE) KRK Peshawar

  
District Education Officer  
(Male) Peshawar



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

### 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(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts:-

<b>Total No. of CT (M) Posts duly verified by the DAO</b>	<b>699</b>
<b>1/3 share of Senior CT Posts</b>	<b>233</b>
<b>Share of promotion 100%</b>	<b>233</b>
<b>Already Promoted as SCT B-16</b>	<b>218</b>
<b>Posts available for promotion</b>	<b>15</b>
<b>Promoted as SCT B-16</b>	<b>15</b>

S.No	S.L. No	Name Of Official	Place Of Posting	Date of Birth	Remarks
1	11	Yaqoob Khan	GHSS NO.1 Peshawar City	01/06/1961	Services placed at the disposal of DEO (M) Peshawar for further posting.
2	15	Rozi Gul	GMS Kankola	15/08/1965	----Do----
3	19	Muhammad Nisar Zahid	GTHSS Gul Bahar	04/02/1963	----Do----
4	28	Abdul Jabbar Khan	GHSS NO.4 Peshawar City	16/09/1962	----Do----
5	32A	Asmat Ullah	GHSS Musa Zai	11/12/1956	----Do----
6	78	Ashfaq Ali Shah	GHS TYARNAB	04/01/1967	----Do----
7	113	Nasrullah Khan	GHS NO.3 Peshawar Cantt.	06/12/1955	----Do----
8	136A	Fazal Muhammad	GHSS Tehkal	04/10/1958	----Do----
9	137	Mehmood Shah	GHSS Chiger Matti	27/01/1960	----Do----
10	157	Muhammad Jamil	GHS Mathra	02/03/1956	----Do----
11	160	Kifayat Ullah	GHS Charpariza	28/04/1964	----Do----
12	177	Inayatullah	GHS Nasapa Payan	05/01/1965	----Do----
13	178	Maqsad Hayat	GHS Masho Gagar	01/10/1970	----Do----
14	182	Abdul Hakeem	GHS NO.3 Peshawar Cantt.	11/04/1964	----Do----
15	195	Ulas Khan	GHS Dudaber	01/12/1965	----Do----

#### Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time.

Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

4 Charge report should be submitted to all concerned.

5 Their Inter-Se- seniority on lower post will remain intact.

6 No TA/DA is allowed for joining his duty.

7 They will give an under taking to be recorded in their 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.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar.

41001-07

Endst: No. / File No.2/Promotion Senior CT B-16: Dated Peshawar the 28/05/2013

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Peshawar
3. District Accounts Officer Peshawar
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/1 file

Dy: Director (Estab)

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

28/5/2013

**BEFORE THE KHYBER PAKHTUNKHWA,  
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 323/2015

Innayatullah..... **(Appellant)**

Versus

Education Department..... **(Respondents)**

.....  
**REJOINDER ON BEHALF OF APPELLANT**

.....  
**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-9) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 Admitted correct by the respondent's Department.
- 2 No comments endorsed by the respondent's Department. Which mean that they have admitted Para-2 of appeal is correct.
- 3 Para-3 of the appeal is not specifically denied by the respondents which mean they have admitted Para-3 of appeal is correct. Moreover, Para-3 of the reply of the respondents is incorrect.
- 4 Incorrect. While Para-4 of the appeal is correct.
- 5 Incorrect. While Para-5 of the appeal is correct.
- 6 No comments endorsed by the respondent's Department. Which mean that they have admitted Para-6 of appeal is correct.

**GROUND:**

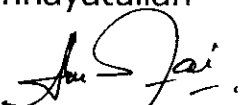
- A) Incorrect. While Para-A of the appeal is correct.
- B) Incorrect. While Para-B of the appeal is correct.
- C) Incorrect. While Para-C of the appeal is correct. Moreover, that promotion of SST(G) on the Basis of district wise seniority is against the law as many juniors SCT/CT were promoted, while seniors SCT/CT were deprived from his legal right of promotion.
- D) Incorrect. While Para-D of the appeal is correct. Moreover, the SST is provisional cadre post and required to be filled in, on the basis of provisional wise seniority not on district wise seniority.
- E) Incorrect. While Para-E of the appeal is correct. Moreover, the SST is provisional cadre post not a district cadre post. Therefore, required to be filled in, on the basis of provisional wise seniority.
- F) Incorrect. While Para-f of the appeal is correct. Moreover, the appellant has not been treated according to law.
- G) Legal.

It is, therefore, most humbly prayed that the appeal of appellant may kindly be accepted as prayed for.

**APPELLANT**

Inayatullah

Through:

  
**(M. ASIF YOUSAFZAI )**  
**ADVOCATE, PESHAWAR.**

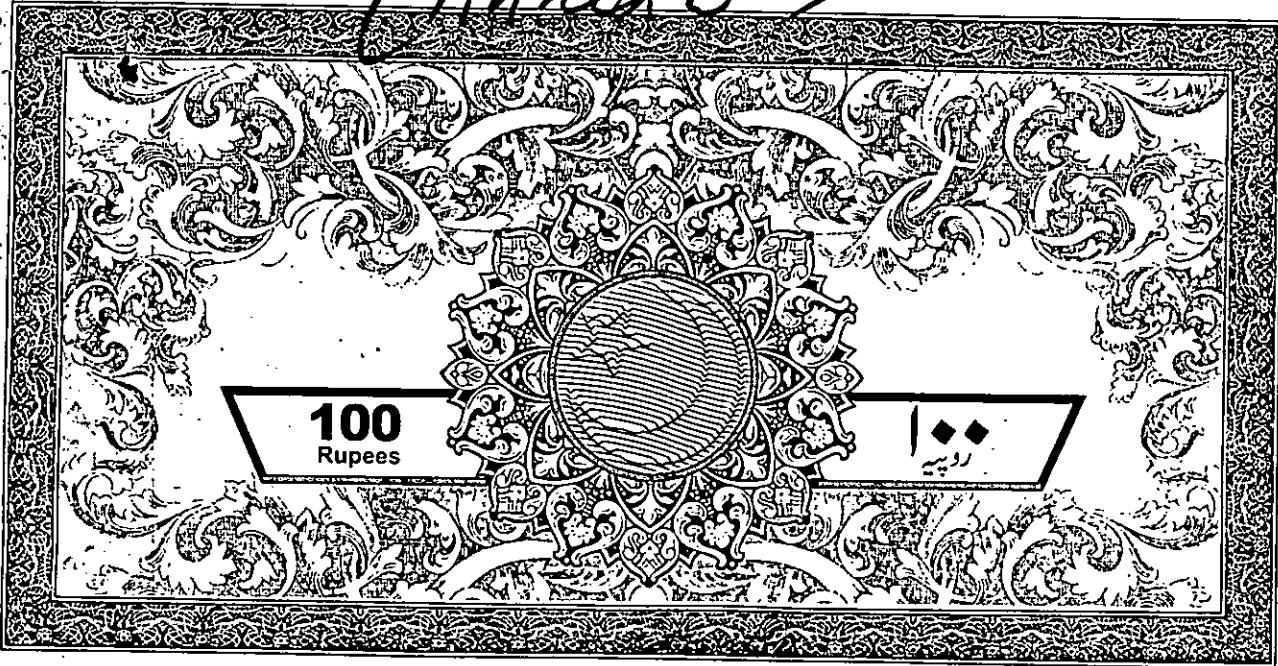
**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able Tribunal.

*fai*  
**DEPONENT**



(Annex J)



30

جناب جسٹریجن سروس ٹرڈینونل KPK مشاور



اشکدہ پنجم سکریٹری ایجوکیشن

سروس اسیل

جو نذول وقت صحت بدن عمل بقا نمی پوش دنیو اس وکثره غیرے

که کلکو دیتی یوں کہ صق قره یوجہ ذاتی عصر و صیات اور پرده ننشی

عمرالت الجناب میں فڈرہ باندہ سبسی کی پیزوی کرتے سے قاصر یوں

بدی وجہ اپنا خاندن مسی ظریف خان کو عنایا راضی عفر کترتا یوں

عنایا راضی کو اضیایا حاصل ہوگا۔ کہ وہ صیر کی طرف سے رسید

دکتر مر دیں درفدست دیں۔ جواب درفدست دیں۔ جواب الجوبد دیں

فیرت گوربان دیں۔ فرجه گوربان کترتا یوں پوزریان پیر صرح کترتا یوں

14/8/13

دیں کروی۔ درصیانی رسید کترتا یوں۔ کترتا یوں تیرکد انت مطلی کترتا یوں

2 جولاء 1904



**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1501 /ST

Dated 15 / 9 / 2016


To

The Director E&SE,  
Peshawar.

Subject: - JUDGMENT

I am directed to forward herewith a certified copy of Judgement dated 31.08.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

# VAKALAT NAMA

NO. \_\_\_\_\_/20

IN THE COURT OF Service Tribunal, Peshawar

Inayat Ullah

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Education Deptt.

(Respondent)  
(Defendant)

I/We Inayat Ullah

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate, Peshawar**, <sup>by Taimur Ali Khan</sup> <sup>Adv</sup> 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 \_\_\_\_\_/20

Inayat Ullah  
( CLIENT )

ACCEPTED

**M. ASIF YOUSAFZAI**  
Advocate

**M. ASIF YOUSAFZAI**  
Advocate High Court,  
Peshawar.

**OFFICE:**

Room No.1, Upper Floor,  
Islamia Club Building,  
Khyber Bazar Peshawar.  
Ph.091-2211391-  
0333-9103240

Taimur Ali Khan  
Advocate  
Yousaf Sajjad Khan  
Adv