

22.11.2022

Learned counsel for the appellant present. Mr. Muhammad Adél Butt Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come for arguments before the D.B. on 13.01.2023.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member(E)

  
(Kalim Arshad Khan)  
Chairman

13.01.2023

Lawyers are on strike today, therefore, case is adjourned to 10.03.2023 for arguments before the D.B. Office is directed to on the notice board as well as website of the Tribunal. ~~copy the notice~~

SCANNED  
KPST  
Peshawar

  
(FAREEHA PAUL)  
Member (E)

  
(ROZINA REHMAN)  
Member (J)

10-3-23

Proper Bench is in complete, There fore  
case is adjourned to 11.05.23.

17-2-22

Due to Retirement of the Hon,ble  
Chairman the case is adjourned to  
come up for the same as before on

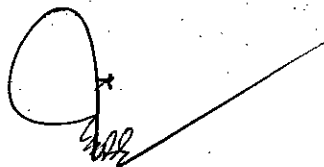
3-6-77

*Spencer*  
Reader

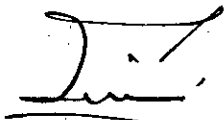
03.06.2022

Syed Noman Ali Bukhari, Advocate (Junior of learned counsel for the appellant) present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court Peshawar. Adjourned. To come up for arguments on 09.08.2022 before D.B.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

9-8-2022

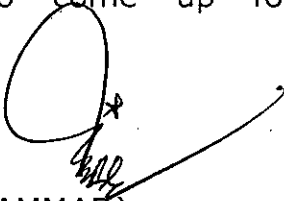
Due to the Public holiday the case  
is adjourned to 22-11-2022


*Ju*  
Reader

26.05.2021

Learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Former requested for adjournment on the ground that he has not gone through the record. Last opportunity is given. Adjourned. To come up for arguments before D.B on 15.09.2021.


  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

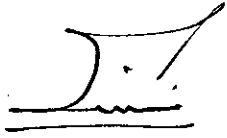
  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

15.09.2021

Mr. Taimur Ali Khan, Advocate junior of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august High Court. Adjourned. To come up for arguments before the D.B on 13.12.2021


  
(ATIQ UR REHMAN WAZIR)  
MEMBER (EXECUTIVE)

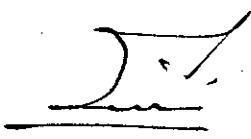
  
(SALAH UD DIN)  
MEMBER (JUDICIAL)

13.12.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 17.02.2022.

  
(Atiq Ur Rehman Wazir)  
Member (E)

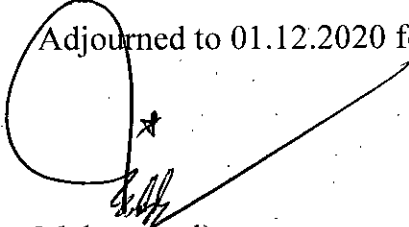
  
(Salah-ud-Din)  
Member (J)

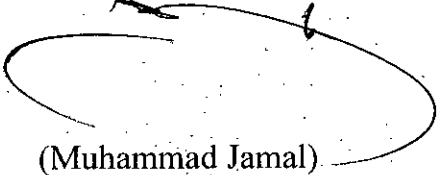
24.09.2020

Mr. Asad Mehmood, Advocate junior of Mr. M. Asif Ali Yousafzai, Advocate on behalf of the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General is present.

Junior to counsel for the appellant is seeking time for arguments as his senior counsel was busy before the Hon'ble Peshawar High Court, Peshawar.

Adjourned to 01.12.2020 for arguments before D.B.

  
(Mian Muhammad)  
Member (E)

  
(Muhammad Jamal)  
Member(J)

~~12.12.2020~~

Due to pandemic of Covid-19, the case is adjourned to 12.02.2021 for the same as before.

  
Reader

12.02.2020

Due to COVID-19, the case is adjourned for the same on 26.05.2021.

  
READER

26.02.2020

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 02.04.2020 before D.B.

  
Member

  
Member

02.04.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 29.06.2020 before D.B.

  
Reader

29.06.2020

Due to public holiday on account of COVID19, the case is adjourned to 24.09.2020 for the same as before.

  
Reader

20.09.2019

Clerk to counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 11.11.2019 before D.B.



Member



Member

11.11.2019

Mr. Taimur Ali Khan, learned counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 01.01.2020 for arguments before D.B.



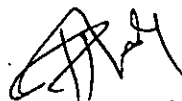
(Ahmad Hassan)  
Member



(M. Amin Khan Kundi)  
Member

01.01.2020

Learned counsel for the appellant present. Mr. Riaz Paindakhel learned Assistant Advocate General for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for further proceedings on 26.02.2020 before D.B.



(Hussain Shah)  
Member




(M. Amin Khan Kundi)  
Member

10.04.2019

Junior to counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for respondents present. Junior to counsel for the appellant seeks adjournment on the ground that senior counsel for the appellant is not available today. Adjourned. Case to come up for arguments on 30.05.2019 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

30.05.2019


Mr. Taimur Ali Khan, Junior counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel is not available today. Adjourned to 24.07.2019 for arguments before D.B.


  
(HUSSAIN SHAH)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

24.07.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District <sup>Attorney</sup> for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 20.09.2019 before D.B.

  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member


15.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 04.01.2019.

  
READER

04.01.2019

Learned counsel for the appellant and Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 04.03.2019 before D.B

  
Member

  
Member

04.03.2019

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 10.04.2019 before D.B.

  
(M. HAMID MUGHAL)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

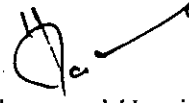


06.08.2018

Junior to counsel for the appellant and Mr. Zia Ullah, learned Deputy District Attorney present. Junior counsel for the appellant submitted rejoinder which is placed on file and seeks adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 28.09.2018 before D.B.



(Muhammad Amin Kundi)  
Member



(Muhammad Hamid Mughal)  
Member

28.09.2018

Counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Counsel for the appellant seeks adjournment. Granted. Case to come up for arguments on 03.10.2018 before D.B.



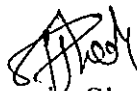
(Ahmad Hassan)  
Member



(M. Amin Khan Kundi)  
Member

03.10.2018

Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney. Junior to counsel for the appellant seeks adjournment on the ground that his senior is not available today. Adjourned. To come up for arguments on 15.11.2018 before D.B.



(Hussain Shah)  
Member



(Muhammad Hamid Mughal)  
Member

**13.03.2018**

Counsel for the appellant present. Mr. Riaz Paindakhel, Assistant AG alongwith Mr. Inayat Ullah, ADO for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 27.03.2018 before S.B.



(M. Hamid Mughal)  
Member

**27.03.2018**

Appellant alongwith clerk to counsel present. Mr. Kabir Ullah Khattak, Addl. AG alongwith Mr. Inayat Ullah, ADO for the respondent present. Written reply submitted. To come up for rejoinder and arguments on 05.06.2018 before D.B.



Member

05.06.2018

Junior to counsel for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Tayyab Gul, Supdt for respondents present. Junior to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 06.08.2018 before D.B.



(Ahmad Hassan)  
Member



(Muhammad Hamid Mughal)  
Member

08.01.2018

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving in Education Department as Physical Education Teacher (BPs-15). It was further contended that the appellant was deferred by Departmental Promotion Committee from promotion to the post of Senior Physical Education Teacher (BPS-16) on the ground of verification of B.A degree of Al-Khair University from HEC. It was further contended that it was responsibility of the department to send the degree for verification before deferring the appellant therefore, the deferring the appellant from promotion by the Departmental Promotion Committee is illegal and liable to be set-aside/rectified.

The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, thereafter notice be issued to the respondents for written reply/comments for 26.02.2018 before S.B.

  
(Muhammad Amin Khan Kundi)  
Member

Appellant Deposited  
Security & Process Fee

26.02.2018

Counsel for the appellant and Addl AG for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply on 13.03.2018 before S.B.



  
(Ahmad Hassan)  
Member(E)

Form-A

FORM OF ORDERSHEET

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

Case No. 1415/2017

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	28/12/2017	<p>The appeal of Mst. Shahida Gul resubmitted today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;">                       REGISTRAR 28/12/17                 </p>
2-	29/12/17.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/01/18.</u></p> <p style="text-align: right;">                       CHAIRMAN                 </p>

The appeal of Mst. Shahida Gul PET GGMS Kultar Pan Distt. Nowshera received today i.e. on 19.12.2017 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellants.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2799 /S.T,

Dt. 20/12 /2017

*[Signature]*  
REGISTRAR *20/12/17*  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M. Asif Yousafzai Adv. Pesh.

*All objections have been removed.*

*[Signature]*

24.09.2020

Mr. Asad Mehmood, Advocate junior of Mr. M. Asif Ali Yousafzai, Advocate on behalf of the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General is present.

Junior to counsel for the appellant is seeking time for arguments as his senior counsel was busy before the Hon'ble Peshawar High Court, Peshawar.

Adjourned to 01.12.2020 for arguments before D.B.

(Mian Muhammad)  
Member (E)

(Muhammad Jamal)  
Member(J)

26.05.2021

Learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Former requested for adjournment on the ground that he has not gone through the record. Last opportunity is given. Adjourned. To come up for arguments before D.B. on 15.09.2021.

(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

15.09.2021

Mr. Taimur Ali Khan, Advocate junior of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august High Court. Adjourned. To come up for arguments before the D.B on 13.12.2021.

(ATIQU UR REHMAN WAZIR)  
MEMBER (EXECUTIVE)

(SALAH UD DIN)  
MEMBER (JUDICIAL)

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1415 /2017

Mst. Shahida Gul

V/S

Education Deptt:

**INDEX**

S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	01-04
2.	Copy of B.A Certificate	--A--	05
3.	Copy of working paper	--B--	06-07
4.	Copy of notification/rule	--C--	08-23
5.	Copy of seniority list	--D--	24-25
6.	Copy of Departmental Appeal	---E---	26
7.	Copy of verification	---F--	27
8.	Vakalat Nama	-----	28

**APPELLANT**

THROUGH:

*M. Asif Yousafzai*  
(M.ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT,  
*Taimur Ali Khan*  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT,  
& *S. Noman Ali Bukhari*  
(S. NOMAN ALI BUKHARI)  
ADVOCATE PESHAWAR

Room No. Fr-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar Cantt:  
Contact No. 03339103240

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2017

Mst. Shahida Gul, PET,  
Government Girls Middle School, Kutar Pan,  
District Nowshera.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1437

Dated 19-12-2017

(Appellant)

VERSUS

1. The Secretary (E&SE), Civil Secretariat, Peshawar.
2. The Director (E&SE), KPK, Peshawar.
3. The District Education Officer (Female) Nowshera.

(Respondents)

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APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION AS S.P.E.T FROM HER DUE DATE WHEN DPC WAS CONDUCTED AND JUNIOR TO HER WAS PROMOTED AND THE CASE OF THE APPELLANT WAS NOT CONSIDER ON THE BASIS OF VERIFICATION OF DEGREE AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL THE INACTION/OMISSION OF THE RESPONDENTS IN PROMOTING THE APPELLANT AS S.P.E.T (BPS-16) FROM HIS DUE DATE MAY BE DELCARE AS ILLEGAL, UNLAWFUL, AGAINST THE PROMOTION RULES AND NORMS OF JUSTICE. THE RESPONDENTS MAY FURTHER PLEASE BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF S.P.E.T (BPS-16) FROM HER DUE DATE BEING ELIGIBLE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND

Filed to-day  
Registrar  
19/12/17



**APPROPRIATE THAT MAY ALSO BE AWARDED IN  
FAVOUR OF APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was appointed on 16.03.2004 by the competent authority. The appellant has the qualification of the F.A, B.A, & also pass the professional examination on 13.07.2003. Appellant had performed his duties assigned to him with zeal and devotion and up to entire satisfaction of his superiors. **Copy of B.A Certificate and working paper are attached as Annexure-A, & B.**
2. That as per notification/service rule of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 13.11.2012, the post of SPET can be filled by promotion on the seniority of cum fitness from amongst Physical Education Teacher, with at least five years service as such and having qualification prescribed for initial recruitment of Physical Education Teacher and the appellant was eligible for promotion as per notification/service rule of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 13.11.2012. **(Copy of the notification/rules is attached as Annexure- C.**
3. That the appellant was at Sr. No. 4 in the final seniority list of PET Female Nowshera District stood on 04.03.2017. The working paper was prepared for Departmental Promotion Committee for the promotion of PET BPS-15 to senior PET BPS-16 in which the appellant name was also included i.e Sr. No. 3 but the appellant was not considered for DPC on the ground that which was mentioned in the remarks columns i.e B.A from Alkhair University subject to verification from HEC. **Copy of the seniority list is attached as Annexure-D.**
4. That though the appellant is fully eligible and entitle for promotion of S.P.E.T (BPS-16) being senior most, therefore the appellant filed department appeal against the illegal, inaction and omission of the respondents, which was not responded within the statutory period of 90 days. **Copy department appeal is attached as Annexure-E.**
5. That now the appellant comes to this august Tribunal on the following grounds amongst the others.

## GROUND:

- A. That not considering the appellant for promotion to the post S.P.E.T (BPS-16) despite having seniority/eligibility, qualification and not taking action is against the law, facts, norms of justice and material on record, therefore, not tenable and is liable to be set aside.
- B. That inaction and omission of respondent department, not to consider the appellant for promotion is against the spirit of section-9 of Civil Servants Act, 1973 and service rights duly protected under the Civil Servants laws.
- C. That the apex Court has already clearly held in case of Anita Turab (PLD-2013 Supreme Court Page No. 195) that matter of tenure, appointment, posting, transfer and promotion, of service could not be dealt with in an arbitrary manner but could only be sustained if it was in accordance with law. Whenever there was statutory provision or rules or regulation of government the matter of appointment of Civil Servants that must be followed honestly and scrupulously and discretionary must be exercised and structured, transparent and reasonable manner, thus the verdict of the Honorable Supreme Court fully favours the appellant's case.
- D. That as there is no any order regarding the stoppage of promotion of appellant, therefore, the appellant has legal vested rights to be considered for promotion from the date when post is available for him in his quota. (97-SCMR-1997-515).
- E. That the Honorable Apex Court is also given the verdict that every civil servants is the legal right to be dealt with in accordance with the law and rules under the which is legal service rights are protected. Thus the appellant has legal and genuine claim.
- F. That the degree B.A degree from Alkhair University is verified by the Deputy Controller Examination on 13.05.2016 and Peshawar High Court, Peshawar also gave judgment in respect of Alkhair University and declare that Alkhair University is registered from HEC. (**Copy of the verification letter is attached as Annexure-F**).
- G. That the DEO (Male) Nowshera office gave promotion to some employees on the basis of Alkhair University Degree but the appellant was discriminated and deprived from his legal right of his promotion in arbitrary manner which is not tenable in the eye of law.

H. That the appellant seeks permission to advance the other ground and proof at the time of hearing.

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

**APPELLANT**

Shahida Gul

THROUGH:

  
(M.ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,

  
(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT,

&

  
(S. NOMAN ALI BUKHARI)

ADVOCATE PESHAWAR

Book No. 198

Serial No. 19799

# AL-KHAIR UNIVERSITY (AJK)



## DETAILED MARKS CERTIFICATE

This is to certify that Shahida Gul  
 Son/Daughter of Syed Mehboob  
 Registration No. AUSWT(BA) 4319-2013 Roll No. 15599  
 has passed Bachelor of Arts Annual/Supplementary Examination  
 held in August 2015 in 1st Division and obtained 498 marks.

The Marks obtained in each subject are given below:-

Papers	SUBJECTS	Marks Obtained	Maximum Marks
I	English Compulsory	120	200
II	Islamiyat, Pak, Kashmir Studies Compulsory	72	100
III	Economics Elective	126	200
IV	Political Science Elective	108	200
V	Islamic Studies Optional	72	100
TOTAL:		498	800

**VERIFIED**

**MUHAMMAD USMAN**  
 Deputy Controller of Examinations  
 Al-Khair University (AJK)

Note: This DMC is issued, errors and omissions excepted, as a NOTICE only. A copy appearing in it does not in itself confer any right or privilege independently to the grant of a diploma / Certificate / Degree which will be issued under the Regulations of the

Bhimber, the 27th October, 2015.

Attested  
 g/c 70

Head Mistress  
 G.G.M.S  
 Kotarpan (NSR)

A  
 5

**DISTRICT EDUCATION OFFICER, FEMALE NOWSHERA**

**Working Papers for Departmental Promotion Committees for  
the promotion of PET B-15 to Senior PET B-16**

Total No of PET Sanctioned posts =					83				
1/3 Share of Senior PET Posts =					27				
Share of Promotion 100% =					27				
Alreay Promoted =					23				
Net to be Promoted =					4				
Proposed for promotion =					4				
S. #	S.L #	Present Place of Posting	Teacher Name	Father Name	Acad: Qual:	Date of Birth	Date of Appointment as Regular PET	Whether Eligible for Up gradation	Remarks
1	1	GGHS Dag Behsud	Raheela Bibi	Aurang Zeb	SSC	01/01/58	06/02/82	No	Not fulfilled the required qualification.
2	2	GGHS, Pabbi	Majan Begum	Munawar Khan	FA	05/05/73	25/04/00	No	Not fulfilled the required qualification.
3	3	GGMS, Kufra Pan	Shahida Gul	Syed Mehboob	B.A	09/09/75	06/03/01	Yes	Bar from Al-Rhama University Subject to confirmation from HEC
4	4	GGHS, Kahi	Saimreen Akhtar	Shadman Khan	M.A/M.A	21/07/81	07/09/07	Yes	Document Available
5	5	GGMS, Asc colony	Nasheen Akhtar	Bakhtiar Sial	B.A	01/01/80	07/09/07	Yes	Document Available
6	6	GGHS, Khar Killa	Hameeda Daud	Muhammad Daud	B.A	01/06/77	07/09/07	Yes	Document Available

**4-6 Certificate:**  
 It is certified that all the PETs (Female) included in the panel for the promotion  
 Hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.

*Signature: [Handwritten]*  
*Signature: [Handwritten]*  
 Date: [Handwritten]

- b) Have completed the required minimum length of qualifying service and qualifications as required for promotion of PET B-15 to Senior PET B-16 under the Rules.
- c). None of them is on deputation to any organization under the Federal/provincial/Autonomous/Semi autonomous/International Organizations
- d). Neither any disciplinary/departmental proceedings/Anti corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of
- e). No one is on long leave/Ex. Pakistan leave.
- f). Their ACRs, Synopsis are free from adverse remarks
- g). They are all alive and serving.
- h). Their appointments order against PETs posts are attached herewith.
- i). The Seniority List of B-15 Officials is final, undisputed and not subjudice.
2. The Departmental Promotion Committee is requested to determine the suitability of the above PETs for promotion of PET B-15 to Senior PET B-16 with immediate effect.

✓  
District Education Officer  
(Female) Nowshera  
DISTRICT EDUCATION OFFICER  
(FEMALE) NOWSHERA

1

DET Page 10 S/NO 18

C B 8



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.

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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.

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

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Section Officer (Primary)



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APPENDIX

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

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			<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)	KPK	By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4.	Senior Certified Teacher (SCT)(General) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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

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10.	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized 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 Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or  (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher.  <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

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		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		<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 (General).</p> <p>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).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
1-1	Certified Teacher (Industrial Arts) (BPS-15)	<p>(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</p> <p>(b) Bachelor's Degree from a recognized</p>	18 to 35 years.	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>

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	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>15. 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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		<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).</p>		<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>16.</p>	<p>Certified Teacher (Home Economics) (BPS-15).</p> <p>KPK</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>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):</p> <p>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.</p>	<p>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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				with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or  (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	18 to 35 years.	By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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SCHEDULE

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

Arabic Teacher

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

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
B.A/BSc	Marks obtained X 20 / total marks =
MA MSc/M Ed / MA Edu	Marks obtained X 20 / total marks =
M.A Islamiat / Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris	Marks obtained X 15 / total marks =
MPhil/PhD	Marks = 05

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Qari/Qaria

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

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

Category of Qualification	Total Marks 100 For Humanities group at Intermediate/Graduation Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection.
HSSC	Marks obtained X 20 / total marks = _____	
BA/BSc	Marks obtained X 20 / total marks = _____	
CT Certificate/ Diploma in Education / ADE	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

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Drawing Master

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

Physical Education Teacher

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

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities group at Intermediate Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
IISSC	Marks obtained X 10 / total marks = _____	
B.A/B.Sc	Marks obtained X 25 / total marks = _____	
PST Certificate/ Diploma in Education / ADE.	Marks obtained X 20 / total marks = _____	
M.A/M.Sc/M.Ed / MA Edu	Marks obtained X 20 / total marks = _____	
M.Phil/PhD	Marks = 05	

Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.
2. The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/ forged/ bogus upon scrutiny/ verification, the service of the teacher concerned shall be terminated and the amount paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery/fraud under the relevant law.
4. Deni Asitad from recognized Tazemut-ul-Wafaqul Madaris, 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 will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be.

OFFICE OF THE DISTRICT EDUCATION OFFICE (FEMALE) NOWSHERA

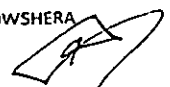
FINAL SENIORITY LIST OF P.E.T. (FEMALE)

#	School Name	Teacher Name	Father Name	Domicile	BPS	Academic Qualification	Sub-MA	Date of Passing Professional Examination	BA Divn	Date of Birth	Date of 1 <sup>st</sup> Appnt.	Date of Regular Appnt. (Trained)	Date Taking Over Charge Present Post	Date Taking over Charge in This Distt
1	GGHS Dag Behsud	Raheela Bibi	Aurang Zeb	NSR	15	SSC				01/01/58	06/02/82	06/02/82	06/02/82	06/02/82
2	GGMS, Kandar	Famida Begum	Sardar Hussain	NSR	15	MA	Urdu	30/08/96	2nd	14/02/68	21/03/92	30/08/96	30/08/96	30/08/96
3	GGHS, Pabbi	Majan Begum	Munawar Khan	NSR	15	FA	F.A.	25/04/00		05/05/73	14/02/96	25/04/00	25/04/00	25/04/00
4	GGHSS NSR Kalan	Shahida Gul	Syed Mehboob	NSR	15	F.A	Nil	13/07/03	Nil	09/09/75	16/03/04	16/03/04	16/03/04	16/03/04
5	GGHS Azakhel Payan	Mona Gul	Lal Badshah	NSR	15	B.A		06/07/04	2nd	10/12/71	07/09/95	06/07/04	06/07/04	06/07/04
6	GGMS, Mughulki	Rehana Khattak	Amir Ghulam	NSR	15	MA	Pol.Sc	15/12/05	2nd	05/08/79	01/09/07	01/09/07	01/09/07	01/09/07
7	GGHS Khai	Samreen Akhtar	Shadam Khan	NSR	15	M.A, M.Ed	Isl;	15/09/06	2nd	15/10/84	01/09/07	01/09/07	01/09/07	01/09/07
8	GGHS PALOSI PAYAN	Noshreen Akhtar	Bakhtiyar Shah	NSR	15	BA		15/07/06	2nd	31/01/86	01/09/07	01/09/07	01/09/07	01/09/07
9	GGMS Pushtoon Garhi	Mamona Daud	Muhammad Daud	NSR	15	BA	Nil	27/09/05	2nd	04/04/77	01/09/07	01/09/07	01/09/07	01/09/07
10	GGHSS Rashakai	Salma	Aman Ullah	NSR	15	BA		15/12/05	2nd	14/08/78	01/09/07	01/09/07	01/09/07	01/09/07
11	GGMS Makeen abad	Farhana Habib	Habibu Rehman	NSR	15	M.A	Urdu	15/09/06	2nd	06/04/80	01/09/07	01/09/07	01/09/07	01/09/07
12	GGHS Kana Khel	Zuhra Inam	Inamullah	NSR	15	MA	Urdu	25/09/06	1st	15/03/87	22/08/07	01/09/07	01/09/07	01/09/07
13	GGHS Barabanda	Mataika	Abdussalam	NSR	15	M.A	Isla	15/09/06	2nd	24/04/86	01/09/07	01/09/07	01/09/07	01/09/07
14	GGMS Walai	Rozia Bibi	Amir Sardar	NSR	15	BA	Nil	DM-2006	2nd	01/01/87	01/09/07	01/09/07	01/09/07	01/09/07
15	GGHS Akbar Pura	Nida Tahir	Muhammad Tahir	NSR	15	BA	Nil	15/09/06	2nd	14/04/85	01/09/07	01/09/07	01/09/07	01/09/07

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	GGHS Taru Jabba	Humaira Ayub	Muhammad Ayub	NSR	15	BA	Nil	15/09/06	2nd	05/04/84	01/09/07	01/09/07	01/09/07	01/09/07
	GGMS Amankot	Huma Gul	Wadair Shah	NSR	15	B.A		15/09/06	2nd	02/11/85	01/09/07	01/09/07	01/09/07	01/09/07
	GGHS Kurvi	Sozia Amin	Amin Khan	NSR	15	M.Sc	HPE	15/09/06	2nd	05/08/82	01/09/07	01/09/07	01/09/07	01/09/07
19	GGHS Nodoh	Nazhida	Amin Khan	NSR	15	FA	Nil	15/09/06	Nil	05/08/85	01/09/07	01/09/07	01/09/07	01/09/07
	GGHS D.I.Khel	Hina Gul	Fazal-e-lahi	NSR	15	M.Sc	Phy Edu	13/06/05	2nd	20/05/83	14/01/09	14/01/09	14/01/09	14/01/09
20	GGHS Mula Killi	Palwasha	Murad Ali Khan	Mardan	15	BA		27/09/05	2nd	06/01/84	06/02/08	06/02/08	06/02/08	01/07/09
21	GGMS Pir Pai	Faiqa Farid	Faridullah	NSR	15	MScP	P.E.H	09/07/07	2nd	01/04/88	15/07/09	15/07/09	15/07/09	15/07/09
22	GHS Mohib Banda	Huma Nawab	Nawab Ali Khan	NSR	15	M.A	HPE	31/08/06	2nd	26/05/84	28/05/10	28/05/10	28/05/10	28/05/10
23	GGMS Banda Sheikh Ismail	Nadia	Gohar ali	Pesh	15	B A	Nil	12/12/07	2nd	01/04/88	06/07/09	06/07/09	06/07/09	01/07/10
24	GGMS Dagi Qadeem	Gul Naz	Fathur Rahman	NSR	15	MA	HPE	15/09/08	2nd	25/03/75	11/01/03	26/05/12	26/05/12	26/05/12
25	GGMS Mughalkai	Shagufta Jawid	Javid	NSR	15	MA	Urdu		2nd	01/01/85	26/05/12	26/05/12	26/05/12	26/05/12
26	GGHS Badrashi	Haleema Sadia	Ali Sarwar	NSR	15	MA	Isl;	18/08/07	2nd	04/10/85	26/05/12	26/05/12	26/05/12	26/05/12
27	GGHS Spin Khak	Fouzia Begum	Mian Niaz Ali	NSR	15	M.Sc	Bot;	15/09/08	2nd	20/04/76	02/02/07	28/05/12	28/05/12	28/05/12
28	GGMS Turlandi	Lubna	Muhammad Safee	NSR	15	M.A	Pashto	0000	2nd	02/03/82	25/05/12	28/05/12	28/05/12	28/05/12
29	GGHS Wazir Garhi	Salma Naz	Qaisar Khan	NSR	15	B.A	MA	00/01/00	1st	12/05/83	28/05/12	28/05/12	28/05/12	28/05/12
30	GGHS Nizampur	Gul Nayab Khattak	Niaz Dar	NSR	15	BA	MA	15/10/08	2nd	12/12/87	28/05/12	28/05/12	28/05/12	28/05/12
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Certified that this seniority list is final, undisputed and non judeceouse All the PET (F) working in District NSR are included in this S/List.

Athar  
 04-03-2017  
 DISTRICT EDUCATION OFFICER  
 (FEMALE) NOWSHERA  




گورنمنٹ پرائمری اسکول کوٹریان

26 (E) اہیل / درخواست پورٹ پوریشن (SPET)

جناب عالیہ! گزارش ہے کہ فدویہ اور منڈ گورنمنٹ سکول کوٹریان

میں (PET) پوسٹ پر کام کر رہی ہے۔ فدویہ کانسٹریٹ اپوائنٹمنٹ (2004-03-15) سے

اور فدویہ کے چوبیس والے ہیں۔ ان کو (SPET) پر ترقی مل گئی ہے۔ لیکن فدویہ

ابھی تک (PET) پوسٹ پر کام کر رہی ہے۔ فدویہ نے (B.O.A) الجینریوٹیورٹی

سے پاس کیا ہے۔ جن کے بارے میں پائٹی کورٹ نے فیصلہ دے دیا ہے

(DEO-M) نوٹشہ آفس والوں نے الجینریوٹیورٹی پر ترقیاں بھی دے دی ہیں۔

اور سابقہ ہی پھر تیاں بھی کر دی ہیں۔

لہذا آپ صاحبان کو یہ بتانی کہ سے فدویہ کو (SPET) پر ترقی دے کر شکور فرمائیں

Forwarded for necessary action  
to DEO (F) NSR

العارضہ

آپ کی تابعدار

شاہدہ گل (PET)

گورنمنٹ گورنمنٹ سکول کوٹریان

دستخط

مورخہ = 20 اگست 2017

Dairy No # 30

S

Lead Mistress  
G.G.M.S.  
Kotariyan (NSR)



# AL-KHAIR UNIVERSITY (AJK)

Main Campus

Pindi Jhunja Road, Bhimber (A.K) Ph: 05828-454084-86-87

No. AU-2 (14) Exams/2016- 2894 Loo

May 13, 2016

OFFICE OF THE DISTRICT EDUCATION  
OFFICER (F) NOWSHERA

Subject: VERIFICATION OF DMC

Dear Sir,

With reference to your letter No.379 dated 09-04-2016, on the above mentioned subject. It is certified that the photocopy of the DMC of following student, received from your office, has been checked and found correct with our record. The same is returned herewith, duly verified with thanks.

Name	Shahida Gul
Father's Name	Syed Mehboob
Registration No.	AUSWT(BA)4319-2013
Examination held in	August, 2015
Discipline	B.A

Yours faithfully,

Deputy Controller of Examinations

D.E.O. (F) Nowshera

File No. 263  
Date 26-5-2016

24.  
Attested

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal NO. 1415/ 2017**

Mst. Shahida Gul..... Petitioners

**VERSUS**

1:- Secretary E/S Education and others..... Respondents

**Respectfully Sheweth**

Written comments on behalf of respondents are as under.

**Preliminary Objections**

1. That the appellant has no cause of action to file the instant appeal.
2. That this Honorable Tribunal has got no jurisdiction to entertain the present appeal.
3. The present appeal is bad for mis-joinder and non-joinder of necessary parties.
4. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
5. That the instant appeal is barred by law.
6. That the appeal is time barred.
7. The appellant has no locus standi to file the instant appeal.

**Factual Objections:-**

1. Incorrect, to the extent of the qualification of BA the appellant passed it from Alkhair University AJK which is not acceptable to the department as according to the Higher Education Commission Alkhair University AJK is not recognized University.
2. Correct, to the extent of Notification dated 13/11/2012 the remaining para is incorrect. The appellant was not eligible for promotion on the basis of BA from Alkhair University AJK.
3. Correct. The appellant degree shall be sent to Higher Education Commission for verification if HEC verified the degree of the appellant she will be considered for promotion.
4. Incorrect. Only seniority is not criteria for promotion. Criteria for promotion is seniority cum fitness (Eligibility) The appellant is not eligible for promotion on the basis of BA from Alkhair University being unrecognized University with HEC.
5. No comments.

**GROUND S**

- A. Incorrect. The act of the respondent is according to Law, Rules and Policy.
- B. Incorrect. The act of the respondent is according to Civil Servants Act and Civil Servants Laws.
- C. Incorrect. The case of the appellant is not identical with Aneeta Turab Case.
- D. Incorrect. The appellant is not eligible to be considered for promotion.
- E. Incorrect. The claim of the appellant is illegal.
- F. Incorrect. The BA degree from Alkhair University must be verified from Higher Education Commission which is mandatory for all candidates to be considered for promotion. The HEC strictly refused to verifying the degrees of Alkhair University.
- G. Incorrect.
- H. The respondent may also be permitted to advance additional arguments at the time of hearing.

It is, therefore, requested that the present service appeal is being meritorless, devoid of force and baseless, may kindly be dismissed.

**Respondent No. 1**

Secretary  
E & S Education Khyber Pakhtunkhwa  
Peshawar

**Respondent No. 2**

Director  
E & S Education Khyber Pakhtunkhwa  
Peshawar

**Respondent No. 3**

District Education Officer  
(Female) Nowshera

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal NO. 1412/2017

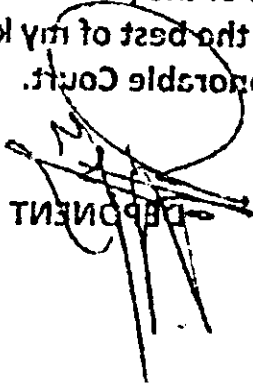
Mst. Shahida Gul..... Petitioners

VERSUS

1:- Secretary E/S Education and others..... Respondents

AFFIDAVIT

I Zulfiqar ul Mulk District Education Officer (Female) Nowshera do solemnly affirm and declare on oath that the contents of the para wise comments on behalf of respondents are true and correct to the best of my knowledge and that nothing has been concealed from this Honorable Court.

  
-DEPONENT



# HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad Ph:90400910 Fax No.90400902

URL: [www.hec.gov.pk](http://www.hec.gov.pk)

No. 16(08)/A&A/Acc/HEC-2014/1643

January 1, 2018

Assistant Director  
(Accreditation & Attestation)

Subject: Verification of degrees of candidates possessing Al-Khair University AJK degrees applied for appointment at the post of PST and Respondent in Writ Petition No. 127-B/2016 and 712-B/2016.

Dear Sir,

Reference to your letter No. 6513/Verification/Al-Khair/Court dated November 11, 2017 on the above subject.

2. It is informed that the Al-Khair University, AJ&K, in total violation of its own law has extended its operations far and wide in Pakistan and AJ&K by opening franchised campuses and illegal affiliated institutions. Complaints about Al-Khair University regarding, poor quality of teaching, weak assessment and evaluation system, non-declaration of results and award of low quality degrees etc. became a regular feature and never been redressed by sponsors of the University despite repeated reminders. The reports have also received regarding sale of degrees. In this backdrop, the Higher Education Commission has banned the academic operations of the Al-Khair University with effect from Fall, 2016 and suspended its degree attestation. It is worth to mention here that all the writ petitions filed in this regard have been dismissed by the honorable Islamabad High Court.

3. Further, the status of validity of petitioners in Writ Petition No. 127-B/16 & 712/B/2016 is given as under:

SN	Name	Father Name	Degree	Regis. No	Session	Remarks
1	Umer Nooh	Ramazan	ADE	AUSWT (ADE) 3642-2012	2012-14	Studied in an illegal College of Swat, KPK (not recognized)
2	Muhammad Tariq	Muhammad Ibrahim	B.Ed.	AUMD (E) 201-2008	2008-9	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
3	Muhammad Tariq	Muhammad Ibrahim	ADE	AUSWT (ADE) 5105-2012	2012-14	Studied in an illegal College of Swat, KPK (not recognized)
4	Nasruminallah	Mosam Khan	ADE	AUMD (ADE) 2281-2012	2012-14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
5	Arif Hayat	Muhammad Yousaf	Nil	Nil	Nil	DMC/Degree not provided
6	Naqeeb Ullah	Awal Zad Khan	Nil	Nil	Nil	DMC/Degree not provided
7	Shoaib Rehman	Muhammad Ibrahim	Nil	Nil	Nil	DMC/Degree not provided
8	M.Shahid Iqbal	Faizdar Ali	BA	AUMD (BA) 2252-2012	2012-14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
9	Zahid Iqbal	Zar Khan	ADE	AUMD (ADE) 2141-2012	2012-14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)



# HIGHER EDUCATION COMMISSION

H-9, ISLAMABAD, PAKISTAN, Website: <http://www.hec.gov.pk>

No. 5-3/HEC/A&A/2016 / 1229

Dated Tuesday the October 18, 2016

**Tahir Abbas Zaidi**

Director General (A&A)

Subject: Verification of Educational Documents of Al-Khair University, Bhimber AJ&K

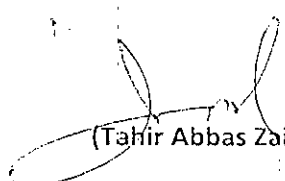
Dear Sir,

Presentation of a few fake degrees of Al-Khair University to HEC for possible attestation has led us to reassess the entire situation before taking any final stance in the matter. HEC has suspended attestation of degrees and transcripts awarded by Al-Khair University and currently evaluating the university's academic and related records to determine genuineness and validity of the awards.

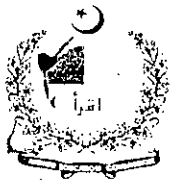
2. In this milieu, it would be appropriate if your good office considers deferring announcement of results for the positions involving candidates having degrees/qualifications from the Al-Khair University, Bhimber, AJ&K till such time that HEC completes the verification of records of the University covering details of student's registration, fee deposits, examinations etc. and decides about the prospect of attestation of the degrees awarded by Al-Khair university. However, Al-Khair University's role and response to requests for provision of necessary information/records have not been encouraging so far.

3. Twelve original (Eleven amounting Rs. 3000/- each and one Bank draft amounting Rs. 2000/-) Bank Draft are returned herewith.

Best regards

  
(Tahir Abbas Zaidi)

The District Education Officer (Male),  
Nowshera,  
Khyber Pakhtunkhwa



# HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad Ph:90400914 Fax No.90400902

URL: [www.hec.gov.pk](http://www.hec.gov.pk)

**Assistant Director**

(Accreditation & Attestation)

No. 16(08)/A&A/Acc/HEC-2014//203

February 22, 2018

**Subject: Verification of Certificates.**

Please refer to your letter No. 2590-91/DEO(M) NSR/Verif;/SST/2015 dated January 29, 2018 on the above subject.

2. It is informed that the Al-Khair University, AJ&K, in total violation of its own law has extended its operations far and wide in Pakistan and AJ&K by opening franchised campuses and illegal affiliated institutions. Complaints about Al-Khair University regarding, poor quality of teaching, weak assessment and evaluation system, non-declaration of results and award of low quality degrees etc. became a regular feature and never been redressed by sponsors of the University despite repeated reminders. The reports have also received regarding sale of degrees. In this backdrop, the Higher Education Commission has banned the academic operations of the Al-Khair University with effect from Fall, 2016 and suspended its degree attestation. It is worth to mention here that all the writ petitions filed in this regard by Al-Khair University have been dismissed by the honorable Islamabad High Court.

3. Further, as per Federal Cabinet Criteria Guideline, 2002, the private sector institutions/universities are not empowered to affiliate institutions, whereas the university has violated its own charter provisions as well as criteria of this Commission. Moreover, Mr. Asif Khan and Mr. Shehzad Ahmad have studied in an illegal college of Al-Khair University (AJK) situated at Muzaffarabad (AK) which is not permitted by HEC. Hence, based on such gross irregularities and on the recent judgement passed by the Honourable Islamabad High Court in the Writ Petition No. 2523 of 2016, any affiliation granted by Al-Khair University (AJK) to an educational institution or opening of its campuses without permission of this Commission would remain illegal unless approved by the HEC. The students enrolled in such colleges/programs cannot claim a right that their degrees be verified. Therefore in view of the above fact, the DMC of Mr. Asif Khan and Mr. Shahzad Ahmad are verified as invalid.

4. This issues with the approval of the Competent Authority.

(Mirza Ali Raza)

✓ **District Education Officer (M)**

Office of the District Education Officer (M),  
Nowshera (KPK).



**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 1415/2017

Shahida Gul

VS

Education Deptt.

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

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1to7) 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 Incorrect. While Para-1 of the appeal is correct. Moreover it is added that Alkhair University also verified the DMC of the appellant which is found correct.
- 2 The first portion of Para-2 of appeal is admitted correct by the respondent department while rest of the contention of the respondent is incorrect. Moreover Para-2 of the appeal is correct.
- 3 Admitted correct by the respondent department needs no comments.
- 4 Incorrect while Para-4 of the appeal is correct as mentioned in the appeal of the appellant.
- 5 No comments.

**GROUND:**

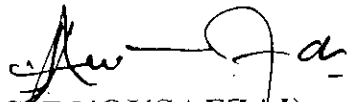
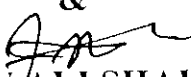
- A) Incorrect. The act of respondent department are against the law fact, norms of justice and material on record therefore not tenable.
- B) Incorrect. While Para-B of the appeal is correct.

- C) Incorrect. While Para-C of the appeal is correct.
- D) Incorrect. While Para-D of the appeal is correct.
- E) Incorrect. While Para-E of the appeal is correct.
- F) Incorrect. While Para-F of the appeal is correct. Moreover the degree of the appellant is duly verified by the Alkhair University. Peshawar high court also gave the judgment in respect of Alkhair University registered from HEC.
- G) Incorrect. While Para-G of the appeal is correct.
- H) Legal.

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

**APPELLANT**

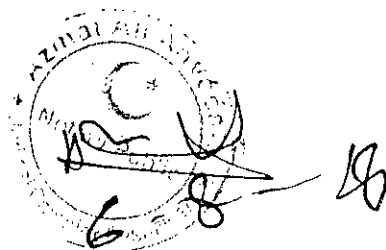
Through:

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
&  
  
(S. NOMAN ALI SHAH BUKHARI)  
ADVPCATE HIGH COURT

**AFFIDAVIT**

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

  
DEPONENT



**BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 1415/2017

Shahida Gul

VS

Education Deptt:

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

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- 5 No comments.

**GROUND:**



- A) Incorrect. The act of respondent department are against the law fact, norms of justice and material on record therefore not tenable.
- B) Incorrect. While Para-B of the appeal is correct.

- C) Incorrect. While Para-C of the appeal is correct.
- D) Incorrect. While Para-D of the appeal is correct.
- E) Incorrect. While Para-E of the appeal is correct.
- F) Incorrect. While Para-F of the appeal is correct. Moreover the degree of the appellant is duly verified by the Alkhair University. Peshawar high court also gave the judgment in respect of Alkhair University registered from HEC.
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- H) Legal.

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**APPELLANT**

Through:

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
&  
  
(S. NOMAN ALI SHAH BUKHARI)  
ADVPCATE HIGH COURT

**AFFIDAVIT**

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DEPONENT

