

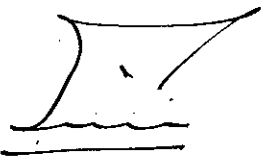
27<sup>th</sup> Feb. 2023

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

SCANNED  
KPST  
Peshawar

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 28.04.2023 before the D.B. P.P given to the parties.

  
(Fareeha Paul)  
Member(E)

  
(Salah-ud-Din)  
Member (J)

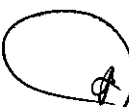
28.04.2023

Appellant present through counsel.

SCANNED  
KPST  
Peshawar

Fazal Shah Mohmand, learned Additional Advocate General alongwith Shahab Khan Litigation Assistant for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 15.06.2023 before D.B. Parcha Peshi given to the parties.

  
(Rozina Rehman)  
Member (J)

14-12-21

DB is on Tour case to come  
up for the same on Dated. 27-1-22

Rudra

27.01.2022

Counsel for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate  
General for respondents present.

Due to rush of work, order could not be dictated,  
therefore, case is adjourned. To come up for order on  
01.02.2022 before D.B.



(Rozina Rehman)  
Member (J)



Chairman

01.02.2022

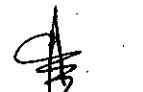
Counsel for the appellant and Mr. Muhammad  
Adeel Butt, Addl. AG for the respondents present.

Due to paucity of time, order could not be  
dictated. To come up for re-arguments on 31.05.2022  
before the D.B.



(ROZINA REHMAN)

Member (j)




Chairman


31.05.2022

Appellant in person present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Former requested for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 09.08.2022 before D.B.

  
(Fareeha Paul)  
Member(E)

  
(Rozina Rehman)  
Member (J)

9-8-2022 Due to the Public holiday the case is adjourned to 29-9-2022


  
Reader


29.09.2022

Nemo for parties.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General present.

Preceding date was adjourned on a Reader's Note, therefore, both the parties be put on notice for 01.12.2022 for hearing before D.B.

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

*Counsel was informed telephonically on 29/11/22*

*01/12/22*

*Deleted from the list to come up on the next date 27/12/22*


  
Reader.

29.07.2021

Appellant with counsel present.

Muhammad Adeel Butt learned Additional Advocate General alongwith Moheed Gul D.A.O for respondents present.

A request for adjournment was made on behalf of appellant; granted. To come up for arguments on 17.09.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

17.09.2021

Appellant present through counsel.

Muhammad Adeel Butt learned Additional A.G alongwith Gul Muheed Accounts Officer for respondents present.

Arguments heard. To come up for order on 15.11.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

15.11.2021

Appellant in person present.

Due to non-availability of proper D.B, therefore, the case is adjourned for the same as before. *14.12.21*


  
READER


02.06.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

Arguments heard. To come up for order on 15.06.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

15.06.2021

Appellant present through counsel and Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

While reading the record, we are noted certain points leading to formulation of following queries:-

1. The post of C.T Agriculture is not reflected in the notification dated 07.08.1991, therefore, there is need of further assistance by the parties under which category of the posts enumerated in that notification, it will fall?
2. Whether there was any condition in advertisement that the candidates possessing higher qualification after their appointment in original pay scale will be placed in higher scale in light of notification dated 07.08.1991?
3. Whether the notification dated 07.08.1991 r/w notification dated 28.07.2008 was in field to extend its benefits to the appellant after his appointment in original pay scale vide order dated 07.03.2011?
4. Whether the entries in service book particularly with reference to an entry available at page-29 of Appeal File was the requirement of decision dated 07.07.2009 of Hon'ble Peshawar High Court in Writ Petition No. 150/2009?

To come up for further arguments on 29.07.2021 before this D.B.

  
(Rozina Rehman)  
Member(J)

  
Chairman

07.10.2020

Appellant in person and Addl. AG alongwith Shahid Anwar, ADEO for the respondents present.

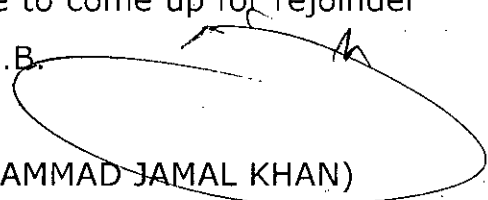
Representative of the respondents seeks further time to submit the requisite reply/comments. Adjourned to 02.12.2020 on which date the reply/comments shall be submitted without fail.

  
Chairman

02.12.2020

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General alongwith representatives of the department Mr. Zakiullah, Senior Auditor on behalf of respondents No. 1 & 5, Mr. Shahid Awan, ADEO on behalf of respondents No. 3, 4, 6, 8, 9, 10 & 11 and Mr. Saleem Sajid, Superintendent on behalf of respondents No. 2 & 7, are also present.

Written replies on behalf of respondents No. 1, 3 to 6 & 8 to 11 have been submitted which are placed on record. Representative of respondents No. 2 & 7 stated at the bar that he rely on the written reply submitted by respondents No. 1 & 5 on behalf of respondents No. 2 & 7. File to come up for rejoinder and arguments on 23.02.2021 before D.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

23.02.2021

Due to COVID, 19 the matter is adjourned to 2.06.2021 for the same.

  
Reader

21.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 15.07.2020 for the same. To come up for the same as before S.B.

  
Reader

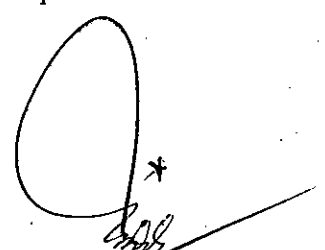
15.07.2020

Counsel for the appellant present. Addl: AG for respondents present.

Learned counsel for the appellant submitted an application for extension of time to deposit security and process fee. Appellant is directed to deposit the same within one week, thereafter notice be issued to the respondents for reply.

Appellant Deposited  
Security & Process Fee \*  
18/7/20


Adjourned to 09.09.2020 before S.B.

  
(Mian Muhammad)  
Member(E)

09.09.2020

Junior to counsel for the appellant and Addl. AG alongwith Ali Haider, SDEO for the respondents present.

Representative of the respondents seeks further time to submit reply/comments. Adjourned to 07.10.2020 on which date the requisite reply/comments shall positively be submitted.

  
Chairman

06.03.2020

Counsel for the appellant Khazan Gul present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Certified Teacher vide order dated 07.03.2011. It was further contended that the appellant was having B.A, B.Ed qualification and on the basis of said qualification, the respondent-department upgraded the post of appellant from BPS-9 to BPS-14 in the light of notification dated 07.08.1994 & 28.07.2009. It was further contended that the appellant was receiving salary of BPS-14 on the basis of said notifications but later on in the year 2019, the Pay Fixation raised objection on the upgradation of the appellant from BPS-9 to BPS-14 and in this respect entry was also made in the service book of the appellant by the respondent-department/Pay Fixation Officer in September 2019. It was further contended that feeling aggrieved from the said entry, the appellant filed departmental appeal on 12.11.2019 but the same was decided vide order dated 05.12.2019 hence, the present service appeal. Learned counsel for the appellant further contended that the appellant was upgraded from BPS-9 to BPS-14 due to higher qualification of B.A & B.Ed on the basis of the aforesaid notifications and same are still in existing, therefore, the impugned entry of Pay Fixation regarding reversion from BPS-14 to BPS-9 is illegal and liable to be set-aside.

The contention raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to limitation and all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 21.04.2020 before S.B.

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

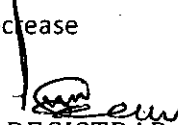



Form- A

FORM OF ORDER SHEET

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

Case No.- 716 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/01/2020	<p>The appeal of Mr. Javed Ali resubmitted today by Mr. Javed Ali Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. decrease</p> <p> REGISTRAR 28/01/2020</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/03/2020</u>.</p> <p> CHAIRMAN</p>
2-		

The appeal of Mr. Khazan Gul son of Fateh Gul r/o Mohallah Miangano Cham Nagram Dir Lower received today i.e. on 02.01.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- not removed*
- ① Copies of comments mentioned in para-6 of the memo of appeal are not attached with the appeal which may be placed on it.
  - 2- Copies of revised entries made by respondents in the service book of the appellant mentioned in para-13 of the memo of appeal are not attached with the appeal which may be placed on it.
  - ③ Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
  - ④ Annexures-G to G-8, H, I, K9 to K15 of the appeal are illegible which may be replaced by legible/better one.
  - 5- Memorandum of appeal may be got signed by the appellant.
  - 6- Annexures of the appeal may be attested.
  - 7- 13 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 24 /S.T.

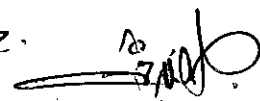
Dt. 7-1- /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

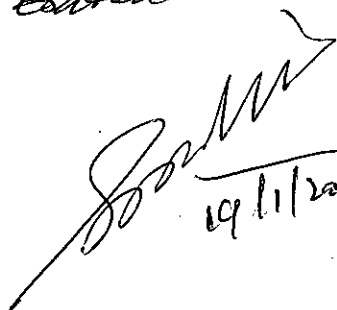
Mr. Javed Ali Adv. Pesh.

NOTE:-

This Service Appeal is hereby re-submitted to the office of Registrar, Service Tribunal KPK, Peshawar after removing the discrepancies as mentioned above.

  
Javed Ali  
Att. 14/1/20

10 days were extended.

  
19/1/2020

NOTE:-

This file was submitted on 14-1-20 before the Honble Registrar Service Tribunal KPK at Peshawar wherein the observations at s.no. 2, 3, 5 and 6 were removed accordingly due to which a time of 10 days were granted to the appellant.


Now, we have applied for the attested copy of observation at s.No.1 which is in process & hopefully will be handedover to us in the next week which accordingly will be attached with this Appeal.

Similarly, the better copies of the relevant portions of documents as per observation at s.No.4 have been made & attached with this Appeal. Moreover, 13 sets of the Appeal along with Annexures are now properly attached.

Now, this file containing the Appeal is hereby re-submitted & the comments copy were not available in w.p. file.

Javed Ali  
A.H.C  
24/01/20

(10) days further extended.

  
24/11/2020

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


Service Appeal No. \_\_\_\_\_/2020

**Khazan Gul VERSUS The Accountant General, KPK Peshawar & Others**

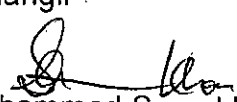
**INDEX**

Description of Documents	Page
Memo of Service Appeal	1-4
Affidavit	5
Address Sheet	6
Application for Interim Relief	7
Affidavit	
Annexure "A" CNIC of the Appellant	8
Annexure "B" Advertisement in Daily "Aaj" dated 19/01/2008	9
Annexure "C" Appointment Order dated 14/02/2009	10
Annexure "D" Para wise Comments of the Respondents	11
Annexure "E" & "E1" Order of the Hon'ble Peshawar High Court, Peshawar dated 07/10/2009	12-13
Annexure "F" & "F1" Notification/Appointment order dated 07/03/2011	14
Annexure "G", "G1", "G2", "G3", "G4", "G5", "G6", "G7", "G8" & "G9" Notification dated 07/08/1991	15-23 "A"
Annexure "H" & "H1" Notification dated 11/07/2012	24-25
Annexure "I" Notification dated 22/10/2016	26-27
Annexure "J" Extract from Service Book of the Appellant	28
Annexure "K", "K1", "K2", "K3", "K4", "K5", "K6", "K7", "K8", "K9", "K10", "K11", "K12", "K13", "K14" & "K15" Extract from Service Book of the Appellant	29-44
Annexure "L" Application dated 23/09/2019	45
Annexure "M" Copy of Reply dated 12/11/2019	46
Annexure "N" Letter dated 05/12/2019	47
Wakalat Nama	48

Dated: January 02, 2020

Appellant  
Through   
JAVED ALP

  
Amir Jehangir

  
Muhammad Saeed Khan  
Advocates High Court, Peshawar

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

①

Service Appeal No. \_\_\_\_\_/2020

**Khazan Gul S/O Fateh Gul R/O Mohallah Miangano Cham Negram, P.O Khadagzai, Tehsil Adenzai and District Lower Dir.**

.....Appellant

**Versus**

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa Finance Department, Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.
4. The District Education Officer Elementary & Secondary Education Timergara, Dir Lower.
5. Accounts Officer Pay Fixation Party ii Camp at Dir Lower.
6. The Executive District Officer (E & SE) District Dir Lower.
7. The Deputy Secretary (Regulations) Finance Department, Peshawar.
8. The Deputy District Officer Elementary & Secondary Education (Male), Timergara Dir Lower.
9. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
10. The District Education Officer (Male) Dir Lower.
11. The Head Master GHS P. Khadagzai, District Dir Lower.

.....Respondents

**Appeal u/s 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned order dated 05/12/2019 whereby the application/appeal of the Appellant has not been entertained regarding his entitlement to BPS-14.**

**Prayer in Appeal:**

On the acceptance of this Appeal, the impugned order dated 05/12/2019 may please be set aside and the Respondents may kindly be restrained from interference of the Appellants entries in Service Book pertaining to placing of the Appellant from BPS-09 to BPS-14 and deducting/depriving the Appellant from the annual increments and benefits accrued/availed in BPS 14.

**Respectfully Sheweth:**

**FACTS:**

1. That the Appellant is a Law abiding citizen and is permanent resident of Mohallah Miangano Cham Negram, P.O Khadagzai, Tehsil Adenzai and District Lower Dir.  
(Copy of CNIC of the Appellant is annexed as Annexure "A")
2. That the Appellant is presently serving as SCT at GHS P. Khadagzai District Dir Lower.
3. That the Executive District Officer Dir Lower through an Advertisement in Daily "Aaj" dated 19/01/2008 advertised the posts of CT (Male and

Female) Teachers for various schools at District Dir Lower the basic qualification for which as per this Advertisement was F.A/FSC.

(Copy of the Advertisement is annexed as Annexure "B")

2

4. That the Appellant being qualified in terms of the advertisement also applied for CT Agriculture Post.
5. That after conducting the due process, the Respondent No.6 issued appointment orders to the successful candidates of CT General on 14/02/2009 while delayed the process of appointment of CT Agriculture candidates for which few successful candidates of CT Agriculture filed a Writ Petition No.150/2009 before the Hon'ble High Court, Peshawar for issuance of directions to the Respondents to issue the appointment orders of CT Agriculture to the Petitioners with all arrears of Pay and back benefits.  
(Copy of Appointment Order dated 14/02/2009 is annexed as Annexure "C")
6. That the instant Writ Petition was duly contested by the then Respondents and in their Para wise Comments, the Respondents admitted at Para No.4 that **"However, to accommodate the candidates appeared for in the test/interview the vacancies are being sought/searched out in the High/Middle Schools of the District so when the same found, the Petitioners be posted as per Merit Position"**.  
(Copy of the Comments is annexed herewith as Annexure "D")
7. That the Hon'ble Peshawar High Court, Peshawar accordingly, disposed off the instant Writ Petition on 07/10/2009 in Terms of the Commitment by the Respondents in their Para Wise comments for appointment of the Petitioners as per their merit position on the availability of vacancies of the CT Agriculture.  
(Copy of the Order dated 07/10/2009 is annexed as Annexure "E", "E1")
8. That in light of the order of Hon'ble Peshawar High Court, Peshawar, the Respondent No.6 vide its Notification/Order dated 07/03/2011 issued appointment orders of the successful CT Agriculture candidates who had applied for the said posts in the year 2008 in BPS-9 under the Rules.  
(Copy of the Notification/Appointment order is annexed as Annexure "F")
9. That accordingly, the Appellant having the BA, MED and M.A qualifications was placed in BPS-14 in light of the Notification dated 07/08/1991 of the Respondent No.7 and Notification dated 28/07/2009.  
(Copies of the Notifications are annexed as Annexure "G" to "G9")
10. That subsequently, the posts of different categories of teachers in Elementary & Secondary Education Department were upgraded w.e.f 01/07/2012 by the Respondent No.3 vide Notification dated 11/07/2012 in pursuance of which the Appellant was placed in BPS-15.  
(Copy of Notification dated 11/07/2012 is annexed as Annexure "H", "H1")
11. That subsequently, through Notification of the Respondent No.10 dated, 22/10/2016, the Appellant was duly promoted from BPS-15 to BPS-16.  
(Copy of the Notification dated 22/10/2016 is annexed as Annexure "I")
12. That as per the service requirements and procedure, the Service Book of the Appellant was regularly updated containing all the relevant entries and entitlements as and when effected. The same entries were time and again verified and certified by the Respondents as evident from the Service Book record of the Appellant including the verification by the Respondent No.5 on 08/07/2013.  
(Extract from Service Book is annexed as Annexure "J" to "J4")
13. That to the surprise of the Appellant, the entry regarding the BPS-14 has been objected by the Respondent No.5 in the month of September, 2019 and the pay entitlement entries of the Appellant in his Service Book have been amended on the reason that the Appellant be placed at BPS-9 in light of the Notification of the Respondent No.3 dated 18/01/2011 which is illegal, mala fide and ineffective upon the legal rights of the Appellant.

14. That the Appellant being aggrieved from the said reversal entries by the Respondent No.5 forthwith filed an Application/Appeal to the Respondent No.1 on 23/09/2019 through Respondent No.11.  
(Copy of Application dated 23/09/2019 is annexed as Annexure "L")
15. That the said application was replied by the Respondent No.5 on 12/11/2019 to the Respondent No.1 without giving any solid reason for his action against the Appellant.  
(Copy of Reply is annexed as Annexure "M")
16. That the said reply of the Respondent No.5 was prepared by the Respondent No.1 on 05/12/2019 duly signed on his behalf by Accounts Officer (HAD) on 06/12/2019 and received by the Appellant on 23/12/2019.  
(Copy of the Letter dated 05/12/2019 is annexed as Annexure "N")
17. That upon receiving the said Letter, the Appellant personally approached the Respondents and provided all the requisite documents however, they have bluntly refused the same and are insisting on the reversal from BPS-16 to BPS-9 and reduction of the existing Pay entries of the Appellant to BPS-9 which is illegal, malafide and ineffective upon the valid legal rights of the Appellant.
18. That the Appellant has agitated his grievances to the Respondents against the unjust and unreasonable order but they are reluctant to provide any relief in this regard hence, the Appellant file this Service Appeal on the following grounds inter alia.

**Grounds:**

- a- That the impugned order of the Respondent No.5 is unjust, against the ground realities and is liable to be set aside.
- b- That the impugned order is against the principles of Natural Justice.
- c- That the impugned order is against the service rules therefore not tenable in the eyes of law.
- d- That the Appellant applied for the post of CT Agriculture vide advertisement dated 19/01/2008 wherein the requisite qualification was set as F.A /FSC and the Appellant fulfilled the requisite criteria in this behalf.
- e- That the Appellant was appointed as per the directions of the Hon'ble High Court, Peshawar vide Order dated 07/10/2009 and on the basis of Advertisement dated 19/01/2008 which have been expressly mentioned in the Appointment Order dated 07/03/2011 but are altogether overlooked by the Respondents.
- f- That the Appellant having the BA qualification was placed in BPS -14 on the basis of a duly circulated Notification of the Provincial Government which was applicable and in force at the time when the said posts were advertised and the order of the Hon'ble Peshawar High Court, Peshawar was passed but the same has not been considered by the Respondents which is illegal and malafide.
- g- That the entries in the Service Book of the Appellant have already and previously been duly verified by the Respondents himself and had found correct and in order in the year 2013 however, astonishingly the said verification and clearance has not been looked into by the Respondents which reflects the malafide on the part of Respondents.

4  
n- That the reason for reverting the Appellant to BPS 9 on the basis of basic qualification of BA for this Post vide Notification dated 18/01/2011 is not applicable on the Appellant as one of the candidate appointed in the same order with the Appellant on 07/03/2011 was having F.A qualification as was set in the Advertisement dated 19/01/2008 however this fact has not been taken into consideration by the Respondents.

i- That this impugned order is not a judicious order hence is void and ineffective upon the rights of the Appellant.

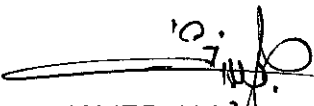
j- That as no illegality or any irregularity has been made in placing the Appellant to BPS 14 by the competent authority hence, the impugned order of the Respondents by reverting the Appellant to BPS 9 is illegal and this order is liable to be interfered and struck down by this August Court in its exclusive jurisdiction in this matter.

It is therefore most humbly prayed that on the acceptance of this Appeal, the impugned order dated 05/12/2019 may kindly be set aside and the Appellant be declared to be legally entitled to BPS- 14 alongwith all its benefits accrued/availed and onward promotions as per the Service Book official Record. Any other relief not specifically prayed for which this Hon'ble Court deems just in the circumstances may also be granted accordingly.

Dated: January 02, 2020

Appellant

Through

  
JAVED ALI

  
Aamir Jehangir

  
Muhammad Saeed Khan  
Advocates High Court, Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

5

Service Appeal No. \_\_\_\_\_/2020

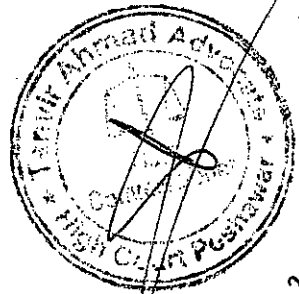
**Khazan Gul VERSUS The Accountant General, KPK Peshawar & Others**

**AFFIDAVIT**

I, **Khazan Gul** S/O Fateh Gul R/O Mohallah Miangano Cham Negram, P.O Khadagzai, Tehsil Adenzai and District Lower Dir, the Appellant do hereby on oath Affirm and Declare that the contents of this Service Appeal are True and Correct to the best of my knowledge and belief and nothing has been kept concealed.

  
Deponent





02-01-2020

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

(6)

Service Appeal No. \_\_\_\_\_/2020

**Khazan Gul VERSUS The Accountant General, KPK Peshawar & Others**

**ADDRESSES OF PARTIES**

**Appellant**

**Khazan Gul S/O Fateh Gul R/O Mohallah Miangano Cham Negram, P.O  
Khadagzai, Tehsil Adenzai and District Lower Dir**


**Respondents**

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa Finance Department, Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.
4. The District Education Officer Elementary & Secondary Education Timergara, Dir Lower.
5. Accounts Officer Pay Fixation Party ii Camp at Dir Lower.
6. The Executive District Officer (E & SE) District Dir Lower.
7. The Deputy Secretary (Regulations) Finance Department, Peshawar.
8. The Deputy District Officer Elementary & Secondary Education (Male), Timergara Dir Lower.
9. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
10. The District Education Officer (Male) Dir Lower.
11. The Head Master GHS P. Khadagzai, District Dir Lower.

Dated: January 02, 2020

Appellant

Through

  
JAVED ALI

  
Aamir Jehangir

  
Muhammad Saeed Khan  
Advocates High Court, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

(7)

Service Appeal No. \_\_\_\_\_ /2020

**Khazan Gul VERSUS The Accountant General, KPK Peshawar & Others**

Application for the grant of an Interim Relief to the effect that the the impugned order of the Respondents dated 05/12/2019 and the relevant reversion entries alongwith deduction of pay/increments of BPS-14 of the Appellant be suspended and Respondents be restrained to insist on, the reversion entries and deduction of monthly pay/Increments of BPS-14 and to continue to disburse the monthly payment regularly as per the pre objection entitlement of the Appellant till final disposal of the main Appeal.

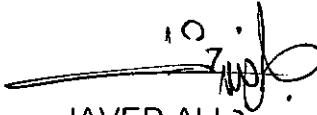
Respectfully Sheweth,

1. That the subject Appeal has been filed by the Appellant/Applicant before this Hon'ble Tribunal in which no date has been fixed yet.
2. That the contents of the main appeal may please be considered as an integral part of this application.
3. That the applicant has got a good prima facie case in his favor.
4. That the balance of convenience also lies in favor of the applicant.
5. That in case the impugned order of the Respondents is acted upon and the injunction is not granted, the applicant will suffer an irreparable loss.

It is therefore most humbly prayed that the impugned order of the Respondents dated 05/12/2019 and the relevant reversion entries alongwith deduction of pay/increments of BPS-14 of the Appellant be suspended and Respondents be restrained to insist on the reversion entries and deduction of monthly pay/Increments of BPS-14 and to continue to disburse the monthly payment regularly as per the pre objection entitlement of the Appellant till final disposal of the main Appeal.

Dated: January 02, 2020

Appellant  
Through

  
JAVED ALI

  
Aamir Jehangir

  
Muhammad Saeed Khan  
Advocates High Court, Peshawar

**AFFIDAVIT**

I, **Khazan Gul** S/O Fateh Gul R/O Mohallah Miangano Cham Negram, P.O Khadagzai, Tehsil Adenzai and District Lower Dir, the Appellant do hereby on oath Affirm and Declare that the contents of this Service Appeal are True and Correct to the best of my knowledge and belief and nothing has been kept concealed.

  
Deponent

Sl. No.	Particulars	Amount	Remarks
20.2.04	112.00	112.00	PTC FAIPOR
21.2.09	12.00	12.00	CT FAIPOR
13.2.00	13.2.00	13.2.00	PTC FAIPOR
22.2.00	14.2.00	14.2.00	PTC FAIPOR

... (The text in this section is extremely faint and illegible due to the quality of the scan. It appears to be a detailed list or report of items and their corresponding amounts.)

Sl. No.	Particulars	Amount	Remarks
1	MAU	10	
2	SBA	10	
3	PTC	25	
4	FAIPOR	40	
5	PTC	20	
6	PTC	20	

Attested  
*[Signature]*

19/08/2008

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BPS-9

THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION DISTRICT DIR LOWER.

As per recommendations of the District Recruitment Committee, the following candidates are hereby pointed as CT in BPS.9 (3820-230-10720) plus usual allowances as due and admissible to them under the rules on Regular sis but without pension and gratuity in terms -19 of the Civil Servant Act 1973 as amended vide NWFP Civil Servants mendment) Act 2005 with immediate under the provision of Establishment & Administration Department Circular ring No. SCR-6(E&AD)13-1/2005 on subject to the following terms and conditions in the interest of public service with mediate effect.

(75 % BATCHWISE)

Name, Father's Name & Residence	Session	Qual:	Score	Proposed School	Remarks
Muhammad Zahoor S/O Zoorzalam Khan R/O Shamshj khan	29-11-87	MA.CT	49.81	GHS.Miskini	A: V:Post
Habibur Rahman S/O Sazan Khan R/O Gumbat Talash	10-07-94	MA.CT	51.59	GMS.Temtai	-do-
Said Dilawar Shah S/O Damsaz Pach R/O Lajbouk	15-11-94	MA.CT	49.23	GMS.Merakai	-do-
Saeedulhaq S/O Azizul Haq R/O Kambat	15-11-94	FA.CT	36.30	GMS.Shahi	-do-
Muhammad Yaqoub Khan S/O Khan Jan R/O Mayar(J)	24-11-94	BA.CT	45.28	GHS.Jawzo	-do-
Bakht Shah Zaib S/O Jehen Zaib R/O shekowlai	09-01-95	MA.CT	54.01	GHS.Chinarkot	-do-
Muhammad Riaz S/O Habib Said R/O Shekowlai	09-03-95	MA.CT	57.77	GHS.Manial	-do-
Rafiq Ahmad S/O Abid Ullah R/O Timergara	20-12-95	MA.CT	58.51	GMS.Gal	-do-
Ihsan Ullah S/O Shamsul Wahab R/O Muzain Banda	20-12-95	MA.CT	55.37	GHS.Takoro	-do-
Azizul Hakim S/O Azizur Rahman R/O Baroon	20-12-95	MA.CT	51.64	GMS.Babagam	-do-
Muhammad Usman S/O Habib Said R/O Shekowlai	24-01-96	MA.CT	61.93	GMS.Nimaskot	-do-
Said Muhammad S/O Amir Muhammad R/O Brangola	24-01-96	BA.CT	43.22	GHS.Pengal	-do-
Gul Akbar Khan S/O Said Anbar Khan R/O Sairtoormong	24-01-96	BA.CT	37.92	GMS.Kandomachla	-do-
Muhammad Ismail S/O Tajbar Khan R/O Dheri Talash	25-05-96	MA.CT	57.25	GMS.Kotkay (SH)	-do-
Hidayatul Haq S/O Fazal Ghani R/O Lal Qela	25-05-96	MA.CT	52.66	GMS.Gumbatbanda	-do-
Fazli Sardar S/O Hazrat Hassan S/O Tekni Bala	25-05-96	MA.CT	50.09	GHS.shorshing	-do-
Sardarul Mulk S/O Amanul Mulk R/O Shekolai	25-05-96	MA.CT	49.69	GHS.Manial	-do-
Asghar Ali S/O Gul Muhammad R/O Badwan Bala	30-08-96	MA.CT	55.48	GMS.Korshung	-do-

RMS & CONDITIONS:-

- They will be governed by such rules and regulations as may be prescribed by the Govt: from time to time for the category of Govt :service to which they belong.
- Their appointments are purely on temporary basis liable to termination at any time with out notice. In case leaving the service , they will be required to submit one month prior notice , or deposit one month pay in Govt: treasury in lieu thereof.
- The appointment of the candidates mentioned above are subject to the condition that they are domiciled in District Dir Lower
- No TA/DA will be paid to them on joining the post.
- Charge reports should be submitted to all concerned.
- The Principals / HM concerned are directed to collect photo copies of the documents from the candidates and sent to this office for verification from their institutions concerned before taking over charge .
- The order is issued as errors and omissions excepted, as a notice only.
- They are directed to take over charge w.e. from 1-3-2009.

(SAEED KHAN)  
EXECUTIVE DISTT:OFFICER  
(E&S)EDUCATION DIR LOWER.

lst.No. 2219-2262 / Dated: 14 / 102/2009

- Copy of the above is forwarded to:-
- 1 The Dist: Coordination Officer Dir Lower at Timergara.
- 2 The Dist :Nazim Dir Lower at Timergara.
- 3 P.A to Secretary Elementary & Secondary NWFP Peshawar.
- 4 P.A to Director Elementary & Secondary Education NWFP Peshawar
- 5-6 The Dist : Officers Elementary & Secondary Dir Lower at Timergara.
- 7 The Dist: Accounts Officer Dir Lower at Timergara.
- 8-25. The Principals, Headmasters/Headmistress & DDO concerned
- 6-43. The candidates concerned.
- 14. DEMIS cell.

مبارک شاہ  
لہ ارجہ منگرو اسٹاؤن  
لہ دیو

EXECUTIVE DISTT:OFFICER  
(E&S)EDUCATION DIR LOWER.

A. A. A. A. A.  
10/2/2009

Filed on 8/08 Annex "D" (10)  
BEFORE THE PESHAWAR HIGH COURT PESHAWAR.

In Re  
W.P. # 150/2009.

Obedur Rahman S/O Noor Muhammad and others of District Dir Lower. Petitioner

VERSUS

Director Elementary & Secy: Edu: NWFP & E.D.O. Dir Lower Etc. Respondent.

Para wise Comments for & on behalf of Respondents

Respectfully Sheweth,

Preliminary Objections

1. The petitioners have got no cause of action to file the instant petition as he is not an aggrieved person within the meaning of Article-199 of the constitution of Islamic Republic of Pakistan, accordingly he is not entitled to discretionary relief.
2. The instant Writ Petition suffers from laches.
3. The Petitioners have concealed the material facts from the Honourable Court.
4. The petitioners are estopped due to their own conduct.
5. The petitioners have got no locus standi to file the petition.
6. The petition is not maintainable in the present form.

On Facts

1. It is correct that an advertisement was floated in the open media to fill-up the vacancies of different categories of teachers including the C.T. teachers.
2. No comments.
3. No comments.
4. Not correct, hence denied. As regards the implementation of the judgment of hon'able court is concerned the same was implemented in the letter and spirit, however the posts of C.T.(Agriculture) was erroneously advertised with the C.T.(General) as no sanction / creation of C.T.(Agriculture) post neither during the time of advertisement was made by the Government, nor thereafter till now. While most of the previous created posts which were vacated due to retirement or otherwise had been filled up by C.T.(General) as the subject of Agriculture is not taught in the relevant institutions. However, to accommodate the candidates appeared for in the test / interview the vacancies are being sought / searched out in the High / Middle schools of the District, so when the same found the petitioners be posted as per merit position.
5. Not Correct, as laid. The factual position already stated above, in para-4.
- 6 to 10. That as stated above in Para-4.

It is therefore most humbly prayed that writ petition in hand being devoid of any

H-1-A



IN THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 150/2009

1. Obaid ur Rehman S/O Noor Rehman R/O Village Qila Gai Siyar P.O Rabat Tehsil Timergara District Dir Lower.
  2. Asad Ullah S/O Anwar Zada R/O Village Qila Gai Siyyar P.O Rabat Tehsil Temergar District Dir Lower.
- (Petitioners)

Versus

1. Executive District Officer (Elementary & Secondary education) Dir lower.
2. District Coordination Officer Dir, Lower.
3. Director (Elementary & School) NWFP Peshawar.
4. Secretary to Govt of NWFP Elementary and School Department NWFP Peshawar.

(Respondents)

Writ Petition under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973

Prayer in Writ Petition:

On acceptance of this Writ Petition an appropriate writ may please be issued directing the respondents to issue appointment orders of CT Agriculture to the Petitioners in accordance with the merit position and the judgment and orders of this Honourable Court rendered in WP No. 1865/2007 decided on 24.10.2008, the judgment and order may also be implemented in letter and spirit and the Petitioners be allowed appointments as CT Agriculture with all arrears of pay and back benefits.

Interim Relief:

The respondents be restrained from re-advertising the post of CT Agriculture or filing the posts of CT agriculture through transfer in Dir lower till the decision of this Writ Petition.

FILED TODAY

Deputy Registrar

20 JAN 2009

9

ATTESTED

EXAMINER  
Peshawar High Court

Respectfully Submitted:

1. That the respondents No. 1 vide advertisement-dated 19.1.2008 invited applications from the desirous candidates for appointment to different posts including the post of CT Agriculture / General / Technical with the prescribed qualification of FA/ FSc with CT certificate. The Petitioners were having the prescribed qualification applied for the said posts and after test and interview the name of the Petitioners were placed at serial No. 5 & 6 of merit list by obtaining 47.58 & 46.43 respectively. (Copies of the advertisement is attached as Annexure A)
2. That in the meantime some PST teacher posted in far flung areas of Dir lower filed WP No. 1865/2007 and claimed posting at their union council in terms of the policy of the provincial Govt, they also obtained stay order on the fresh appointments and thus issuance of appointment letters to the Petitioners was stayed/ kept pending due to the orders of this Honourable Court.
3. That during the course of proceedings the Petitioners filed application for impleadment, they were accordingly impleaded in the panel of respondents vide order dated 25.6.2008. The Writ Petition was heard on 24.10.2008 & vide a consolidated judgment the Writ Petition along with the CMs were disposed off with a direction to the respondents to examine the cases of transfer and new appointments and to decide the same with in one month in accordance with the Govt policy, with intimation to the court. It is pertinent to point out here that the post of the petitioners were not disputed albeit due to the stay all the post of the advertisement dated 19.1.2008 appointment to the petitioners was not issued. (Copies of the Memo of Writ Petition & judgment and order dated 24.10.2008 are attached as Annexure B & C)
4. That after the judgment and order of this Honourable Court some of the Petitioners filed applications for issuance of the appointment letters and implementation of the judgment and order of this Honourable Court, however neither the Petitioners were issued appointment order nor the judgment of this honourable Court was implemented.
5. That the Petitioners when approached the respondents for issuance of appointment letters they have been refused appointment because the political figures are now pressing for wrapping the appointment process and re-advertising these posts so that their blue eyed and political favourites could get appointments, these acts and omissions of the respondents is highly illegal, against the principles of natural justice, and amounts to willfully flouting and violating the Judgment and Order of this Honourable Court.

FILED TODAY

Deputy Registrar  
20 JAN 2009

**ATTESTED**

**EXAMINER**  
Peshawar High Court



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- 6. That the Petitioners recorded their protest and put the matter to press albeit no action was taken by the respondents.
- 7. That the respondents are bound to appoint the Petitioners, because they have undergone the process of appointment, and came on the merit the respondents were left with no alternative but to issue appointment letters to the Petitioners albeit there reluctance in appointing the Petitioners are contumacious and contemptuous.
- 8. That there are sanctioned posts of CT Agriculture available, that were filled from CT General, thus the respondents are bound to adjust the Petitioners and issue them appointment letters. (Copies of the letters are attached as Annexure D & E)
- 9. That while applying to the post of CT Agriculture and having come on merit lists valuable rights have been created in favour of the Petitioners and the respondents cannot be allowed to overrun the process of appointment and to adjust their blue eyed.
- 10. That in the interest of justice and for the sake of rule of law, the respondents are bound to obey the law and honour Judgment of this Honourable Courts.

It is therefore prayed that On acceptance of this Writ Petition an appropriate writ may please be issued directing the respondents to issue appointment orders of CT Agriculture to the Petitioners in accordance with the merit position and the judgment and orders of this Honourable Court rendered in WP No. 1865/2007 decided on 24.10.2008, the judgment and order may also be implemented in letter and spirit and the Petitioners be allowed appointments as CT Agriculture with all arrears of pay and back benefits.

**Interim Relief:**

The respondents be restrained from re-advertising the post of CT Agriculture or filing the posts of CT agriculture through transfer in Dir lower till the decision of this Writ Petition.

*[Handwritten Signature]*

Petitioners

Through

*[Handwritten Signature]*

IJAZ ANWAR  
Advocate, Peshawar

RECEIVED

Deputy Registrar  
20 JAN 2009

*[Handwritten Mark]*

**ATTESTED**

**EXAMINER**  
Peshawar High Court

3-A 13-A

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List of Books:

1. Constitution, 1973
2. NWFP Civil Servant Act, 1973.
3. NWFP Civil Servants (Appointment, promotions and Transfer Rules, 1989.
4. Books according to need.

Certificate

Certified that a writ petition between the same parties has been filed previously, however the subject matter in this case is different.

Petitioners



CERTIFIED TO BE TRUE COPY

EXAMINER  
Peshawar High Court, Peshawar  
Authorised Under Article 87 of  
The Qanun-e-Shahadat Order 1984

28 JAN 2020

FILED TODAY

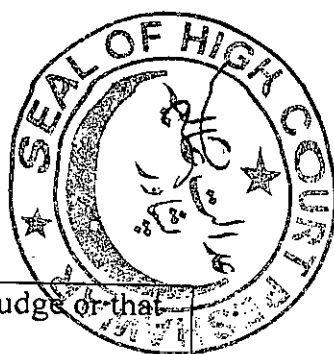
Deputy Registrar  
27 JAN 2009



13-13

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order or proceedings	Order or other proceedings with Signature of Judge or that of parties or counsel where necessary.
07.10.2009	<p>W.P.No.150/2009 with interim relief.</p> <p>Present: Mr.Ijaz Anwar, Advocate for the petitioner.</p> <p>Mr. Ikramullah Khan, AAG for the respondents.</p> <p><u>SHAH JEHAN KHAN YOUSAFZAI, J:-</u> Since the respondents in their parawise comments have stated in para-4 that erroneously the posts of C.T. (Agriculture) were advertised although no such post was available for filling. They have also committed themselves that they are in search of vacancies in the High/Middle schools of the District and if the same found the petitioners shall be posted as per their merit position.</p> <p>Learned counsel for the petitioners states that the petitioners will satisfy and will not press for this petition provided a directions is made in terms of commitment made by the respondents in their parawise comments that they shall fill the posts of C.T. (Agricultural) on availability and the petitioners shall be granted posting subject to merit position.</p> <p>The writ petition is disposed of in the above terms.</p> <p><i>Shah Jehan Khan</i> Senior Puisne Judge</p> <p><b>CERTIFIED TO BE TRUE COPY</b></p> <p>EXAMINER Peshawar High Court, Peshawar Authorised Under Article 8,7 of The Qanun-e-Shahadat Order 1984</p> <p>28 JAN 2020</p> <p><i>Phila</i> <i>12/10/10</i></p> <p><i>[Signature]</i> Judge</p>

No. 2264  
Date of Presentation of Application 22/1/22  
No of Pages 5-7  
Copying fee 30  
Total 1  
Date of Preparation of Copy 28/1/2020  
Date of Delivery of copy 29/1/2020  
Received By [Signature]

RECEIVED  
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OFFICE OF THE EXECUTIVE DISTT:OFFICER(E&SE) DIR LOWER AT TIM  
Office Order:-

In pursuance of the Judgment of the Honourable High Court Khyber Pakhtunkhwa Peshawar decision No.150/2009 dated 7-10-2009 the following candidates who hasd applied for the said posts in 2008,and were found eligible,are hereby appointed as Ct Agriculture/ CT Industrial Arts in BPS.9 (3820-230-10720) plus usual allowances as due and admissible to them under the rules,in the interest of public service,from the date of their taking over the charge,subject to the following terms and conditions.

S#	Name of Candidate with F/Name	Address	Session	Qualification	Score	Proposed School	Remarks
01	Khazan Gul S/O Fateh Gul	Vill;Nagram	27-02-98	MA.CT	57.56	GHS.Manial	AVP CT.Agr:
02	Ghulam Rahman S/O Mohammad Amin	Vill;Khadagzi	11-05-99	MA.CT	53.84	GHS.Chinarkot	-do-
03	Muhammad Ayub S/O Mohd Azam	Vill;Haya Seri	11-05-99	BA.CT	53.16	GHS.Luqman Banda	AVP.CT Ind:Arts
04	Showkat Ali S/O Muhd Jan	Vill;Shontala	2005	BA.CT	51.21	GHS.Shalkandi	AVP.CT Agri:
05	Shah Faisal S/O Muhammad Zaman	Vill;Zaman Pati	11-05-99	FA.CT	49.84	GHSS.Munda	-do-
06	Obaidur Rahman S/O Noor Rahman	Vill;Qilagai	30.12.2005	BA.CT	47.60	GHSS.Lal Qela	-do-
07	Asad Ullah S/O Anwar Zada	Vill;Qilagai	28-12-04	BA.CT	46.45	GHS.Sangolai	-do-
08	Abdul Hafiz S/O Noorul Wahab	Vill;Ouch	31.03.01	BA.CT	41.45	GHSS.Ouch	AVP.CT Ind: Arts

**TERMS & CONDITIONS:-**

1. Their services will be considered regular but without pension and gratuity in terms of section-19 of the Khyber Pakhtun Khwa Civil Servants Act 1973 as amended vide Khyber Pakhtun Khwa Civil Servants(Ammendment)Act,2005.They will however be entitled to the contributory provident fund in such a manner and it such rates as prescribed by the Govt;.
2. They will governed by such rules and regulations as may be prescribed by the government from time to time for the category of government servants to which they belong.
3. Their appointment are purely on temporary basis liable to termination at any time without notice. In case leaving the service, they shall be required to submit one month prior notice OR deposit one month,s pay in the government treasury in lieu thereof.
4. They are directed to produce their Health & Age certificate from the Civil Surgeon Dir lower at Timergara.
5. The appointment of the candidates mentioned above are subject to the condition that they are domiciled in District Dir lower.
6. NO TA/DA will be paid to them on joining the post.
7. Charge reports should be submitted to all concerned.
8. The DDO concerned are directed to collect photo copies of the documents from the candidates and sent to this office for verification from the relevant institutions before taking over charge.
9. The order is issued as errors & omissions excepted as a notice only.
10. They will not entitled to claim any kind of benefits seniority etc prior to the taking charge of this order as per under taking provided.by the petitioners.

( Mohammad Ibrahim )  
EXECUTIVE DISTT:OFFICER  
(E&SE) DISTRICT DIR LOWER

Endst.No. 3448-69 /Appt:2011/Estab: Dated Timergara the 07/03/2011.

Copy forwarded to:-

1. The Deputy Registrar Peshawar High Court Peshawar.
2. The District Coordination Officer Dir Lower.
3. PA to the Secretary Elementary & Secondary Deptt: NWFP Peshawar.
4. PA to the Director Elementary & Secondary Education NWFP Peshawar.
5. The District Accounts Officer Dir lower at Timergara.
6. The District Officer (M) Dir local office.
- 7- 14. The Principals/ H.M (M&F)concerned.
- 15-22. The candidates concerned.

EXECUTIVE DISTT:OFFICER  
(E&SE) DISTRICT DIR LOWER

Attested  
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7/03

Annex "G"

15

GOVERNMENT OF NORTH WEST FRONTIER PROVINCE  
FINANCE DEPARTMENT.

کونسل  
مدراس  
پشاور

NOTIFICATION

Peshawar, dated the 7th August, 1991.

(PRC)1-1/89- In exercise of all the powers enabling him in behalf the Governor of the North-West Frontier Province is ordered to order the following scales of pay/benefit to various series of Teachers with effect from 1-7-1991.

Name of the Post.	Benefits extended
2.	3.

Primary School teachers (PTC/J.V)

All the present and future primary school teachers who hold the qualification of F.A/F.Sc. (2nd Division) plus existing prescribed professional training shall be placed in BPS-9 with 1/3rd in selection grade BPS-10.

All other teachers who do not possess higher qualification shall continue getting existing pay scale with selection grade accordingly.

However, the higher scales/grades allowed to these teachers will be personal to them and the inter-seniority will remain intact.

Elementary school teachers (E.S.T/V.P.E.T/ Drawing Masters/PTI.

All the present and future elementary school teachers who possess the qualification of B.A/B.Sc (2nd Division) plus existing prescribed professional training shall be placed in BPS-14 with 1/3rd in Selection Grade BPS-15.

All other teachers who do not possess higher qualifications shall continue getting existing pay scales with Selection Grade accordingly.

However, the higher scales/grade allowed to these teachers will be personal to them and the inter-seniority will remain intact.

Arabic Teachers.

All the present and future Arabic Teachers who possess the qualification of Trained Fazil with B.A/B.Sc. (2nd Division) and five years teaching experience or M.A. Arabic or equivalent qualifications shall be placed in BPS-14 with 1/3rd in Selection Grade BPS-15.

ATTESTED

Ashraf Khan

Attested  
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[Signature]

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Sl. No.	Name of the Post.	Benefits extended.
1.	2.	3.

All other teachers who do not higher qualification shall continue getting existing pay scale with Selection Grade accordingly.

However, the higher scale/grade allowed to these teachers will be personal to them and the inter-seniority will remain intact.

4. Secondary School Teachers. All the present and future Secondary School Teachers with prescribed qualification under the Rules shall be placed in BPS-16 with 1/3rd Selection Grade BPS-17.

The advance increments sanctioned by Finance Department vide Para 9 of its letter No. FD (SR-I) 1-67/82 dated 24-8-1983 will not be admissible on acquiring/possessing qualifications for which higher pay scales are being sanctioned through this notification.

SECRETARY TO GOVERNMENT  
North West Frontier Prov.  
Finance Department.

End t. No. FD (PRC) 1-1/89. Dated Peshawar the, 7th August 1989

A copy is forwarded to the Accountant-General, NWFP, Peshawar for information and necessary action.

*Ghulam*

(GHULAM DASTGIR AKHTAR)  
Deputy Secretary (Regulation)  
Finance Department.

Indst. No. FD (PRC) 1-1/89. Dated Peshawar, the 7th August, 1989

A copy is forwarded to:-

1. All Administrative Secretaries to Govt. of NWFP.
2. All Commissioners of Division, N.W.F.P.
3. All Heads of Attached Departments NWFP
4. The Secretary to Governor, NWFP
5. The Registrar, Peshawar High Court, Peshawar.
6. The Secretary Public Service Commission, NWFP
7. The Registrar Service Tribunal, NWFP.
8. All Dy. Commissioners/Political Agents/District Session Judges in NWFP.

RECEIVED

*Ghulam*

(GHULAM DASTGIR AKHTAR)  
Deputy Secretary (Regulation)  
Finance Department.

ATTENTION

*Filed*  
*[Signature]*

Government of North West Frontier Province  
Finance Department

*better copy*

Peshawar Dated the 7<sup>th</sup> August, 1991

No.(PRC)1-1/89-: In exercise of all the Powers enabling him in this behalf the Governor of the North West Frontier Province is pleased to Order the following Scales of Pay/Benefit to various Categories of Teachers with effect from 01/07/1991.

1. Name of the Post	Benefits Extended
2.	3.
Primary School Teachers (PTC/J.V)	All the Present and Future Primary School Teachers who hold the qualification of F.A/F.Sc. (2 <sup>nd</sup> Division) plus existing prescribed professional Training shall be placed in BPS-9 with 1/3 <sup>rd</sup> in Selection Grade BPS-10. All other Teachers who do not possess Higher Qualification shall continue getting existing pay scale With Selection Grade accordingly. However, the Higher Scales/Grades allowed to these Teachers will be personal to them and the Inter-Se-Seniority will remain intact.
Elementary School Teachers (E.ST/J.V/P.E.T/ Drawing Masters/PTI)	All the Present and Future Elementary School Teachers who possess qualification of B.A/B.Sc (2 <sup>nd</sup> Division) plus existing prescribed Professional Training shall be placed in BPS-14 with 1/3 <sup>rd</sup> in Selection Grade BPS-15. All other Teachers who do not possess Higher Qualification shall continue getting existing pay scale With Selection Grade accordingly. However, the Higher Scales/Grades allowed to these Teachers will be personal to them and the Inter-Se-Seniority will remain intact.
Arabic Teachers	All the Present and Future Arabic Teachers who possess the qualification of Trained Fazil with B.A/B.Sc (2 <sup>nd</sup> Division) and Five years Teaching Experience or M.A Arabic or equivalent qualifications shall be placed in BPS-14 with 1/3 <sup>rd</sup> in Selection Grade BPS-15.



"G2."

(17)

(15)

Page-10

Better Copy

A copy of Finance Department Government of NWFP circular letter No. FD(PRC)1-1/89 dated 11<sup>th</sup> August 1991 addressed to all the Administrative Secretaries in NWFP and others.

SUBJECT: REVISION OF BASIC PAY SCALES AND FRINGE BENEFITS OF CIVIL EMPLOYEES (BPS-1-15), OF THE PROVINCIAL GOVERNMENT (1992)

Sir, I am directed to refer to the subject noted above and to say that the Governor NWFP has been pleased to sanction revision of the Basic Pay Scales for the Provincial Civil Servants (BPS-1-15) as detailed in the following paragraphs;

2. BASIC PAY SCALES;-

The existing modified and revised Pay Scales are detailed in the annexure to this letter. The revised pay scales shall replace the Basic Pay Scales, 1987 and shall be effective from the 1<sup>st</sup> June 1991.

3. INITIAL FIXATION OF PAY.

a) The initial pay of the existing employees who have been in Government Service since before the 1<sup>st</sup> June 1991, shall first be fixed in modified scale at the stage having the same pay of if there is no such stage at the next higher stage. Thereafter the pay shall be fixed in the Revised Pay Scale on point to point basis i.e. at the stage in the relevant revised basic pay scale which is as many stages above the stage occupied by him above the minimum of the modified basic scale.

b) In the case of those employees whose pay is fixed in the revised scale at a stage which gives less than Rs.100/- increase in pay of May, 1991 a minimum increase of Rs.100/- in pay over May, 1991 level would be allowed and thereafter this pay or if there is no such stage at the next higher stage. The pay fixation formula has been illustrated through examples I, II, & III in appendix.

c) The annual increment shall continue to be admissible subject to the existing conditions on the 1<sup>st</sup> of December each year.

d) The increase allowed since 1-7-1988 as detailed below shall cease to be admissible from 1-6-1991;-

a) Indexed pay sanctioned vide Finance Department circular No. FD(PRC)1-3/85 dated 4-8-1988.

Assesed to [Signature]

- b) Adhoc increase of 5% of pay sanction vide circular No. FD (PRC) 1-3-/85 dated 13-1-1990.
- c) Adhoc increase of 10% sanctioned vide Finance Department circular No. FD (PRC) 1-3-/89 dated 21-7-1990.
- d) Dearness Allowance of Rs.200/- P.M sanctioned via Finance Department circular No. FD (PRC) 1-3/89, dated 16-1-1991.

4. FIXATION OF PAY ON PROMOTION.

- a) In cases of promotion from a lower to higher post/ scale before the introduction of these scale pay of the employee concerned in the revised scale may be fixed and so enhanced that it would not be less than the pay that would have been admissible to him if his promotion to the higher post/ scale had taken place after the introduction of these scales.
- b) Government employees who are allowed selection grade shall be granted one premature increment from 01-06-1991 as is allowed in the case of promotion.

5. GRANT OF ADVANCE INCREMENTS TO OFFICIALS FOR POSSESSING/ ATTAINING HIGHER EDUCATIONAL QUALIFICATION.

i) From 1-6-1991 onwards advance increments shall be allowed without the condition of the second division to the officials in BPS-1-15 for possessing or acquiring higher educational qualifications over and above prescribed qualifications in the relevant recruitment Rule to the extent given below;

	No. of Advance increments for obtaining			
	Matric	F.A/ F.Sc.	B.A/ B.Sc	M.A/ M.Sc
a) where the prescribed qualification in Non Matric	2	4	6	8
b) Where the prescribed qualification is matric	NIL	2	4	6
c) where the prescribed qualification is F.A	NIL	NIL	2	4
d) Where the prescribed qualification is B.A/ B.Sc	NIL	NIL	NIL	2

The advance increment already allowed in terms of Para No.6(a) Finance Department a letter No. FD (PRC) 1-1/87, Vol. III dated 22-7-1987, would be double from 1-6-1991

*Alleged*  
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*[Signature]*

ii) The advance increments shall be allowed at the time of recruitment or acquisition of higher qualification whichever is latter. In cases where the employee is already at the maximum of the scale, he may be allowed the number of advance increments beyond the maximum of the scale as personal pay to be absorbed at the time of his promotion. Those employees who had acquired higher qualification in 3<sup>rd</sup> Division prior to 1-6-1991 and were not granted advance increments earlier would henceforth be allowed advance increments with effect from 1-6-1991.

6. MOV-OVER

The concession of Move-Over shall be available from 1-6-1991 onwards to those who are enjoying selection grade.

7. SPECIAL PAYS.

The existing Special pay admissible to various categories of Personal Assistants in BPS-15 shall be revised from 1-6-1991 as under:

NAME OF POST	EXISTING RS. PER MONTH	REVISED RS. PER MONTH
P.A to Minister	100	150
P.A to Chief Secretary/ Addl Chief Secretary	75	120

8. TEACHING ALLOWANCE

The existing rate of teaching allowances admissible to qualified teachers of High School who teach Science subjects of Physics, Chemistry, Biology and Mathematics and Junior Instructors in Poly Technic shall be enhanced as under:

- a) For High School Science From 100 P.M to Rs.200 P.M
- b) For Junior Instructors in poly Technic who possess technical teachers Diploma From Rs.100P.M to Rs.200P.M

9. MEDICAL ALLOWANCE

The existing rate of Medical Allowance of Rs.50/- P.M admissible to the employees in BPS 1-15 shall be enhanced to Rs.10 to Rs.50/- P.M.

*Amended*  
*[Signature]*

OFFICE

10. MESSING / DIET ALLOWANCE

a) The existing rate of messing/ diet allowance for Nursing Cadre (below BPS-16) shall be enhanced from rs.300/- to Rs.500/-

b) UNIFORM ALLOWANCE

The existing rate of uniform allowance for Nursing Cadre (Below BPS-16) shall be enhanced from Rs.125/- P.M to Rs.150/- P.M.

c) NIGHT DUTY ALLOWANCE

The Nigh Duty Allowance shall be admissible as under

- i) For assistants / Clerk Rs.8/- per Nigh
- ii) For Staff Car Drivers/ Dispatch Riders Rs.4/- per Nigh
- iii) Fro Naib Qasim Rs.3/5 per Nigh...

d) WASHING GRANT/ ALLOWANCE ADMISSIBLE TO LIVERIED STAFF.

The existing rates of washing grant/ allowance shall be enhanced form rs.25/- per month to Rs.30/- per month

e) CONVEYANCE CHARGES FOR LATE SITTING AFTER OFFICE HOURS.

the existing rates of conveyance charges admissible to employees in BPS 1 TO 16 ( Non Gazetted) shall be enhanced as under;

i) ON WORKING DAYS

FOR OFFICIALS IN bps 1-2

For officials in BPS 3-15

FROM Rs.3.50 P.D  
 To Rs.4.50 P.D  
 From Rs.4.50 P.D.  
 To Rs.5.50 per Day

ii) ON CLOSED HOLIDAYS

Fro Officials in BPS1-2

For Officials in BPS 3-15

From Rs.4.50 P.D  
 To Rs.5.50 per Day  
 From Rs.7.00 P.D.  
 To Rs.8.00 per Day

Your obedient servant

Sd/-

(GHULAM DASTAGIR AKHT)  
DEPUTY SECRETARY (REF)  
FINANCE DEPARTMENT

*Agreed*  
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*[Signature]*

BAKHT BALDAR  
C/Sec. A TA  
Swat.

GOVERNMENT OF NWFP  
FINANCE DEPARTMENT

Dated Peshawar, the 29.8.1992.

NOTIFICATION.

No. FD(PCR) 1-1/89. This Department Notification bearing even numbers dated 7th August, 1991 and 16th April, 1992 regarding admissibility of higher scales of pay benefits to various categories of School Teachers shall be effective from 1.6.1991 instead of 1.7.1991.

SECRETARY TO GOVT. OF NWFP  
FINANCE DEPARTMENT.

Order No. FD(PCR) 1-1/89

Dated Peshawar, the 29.8.1992.

Copy of the above is forwarded to:-

- 1. All the Administrative Secretaries to Govt. of NWFP.
- 2. All the Commissioners of Divisions, NWFP.
- 3. All the Heads of Attached Departments in NWFP.
- 4. The Secretary to Government, NWFP, Peshawar.
- 5. The Registrar, Peshawar High Court, Peshawar.
- 6. The Registrar, Services Tribunal, NWFP, Peshawar.
- 7. The Secretary, Public Service Commission, NWFP.
- 8. All the Deputy Commissioners/Political Agents/  
District and Session Judges in NWFP.

( GHULAM DASTGIR ANWAR )  
Additional Secretary (Regulation)  
Govt. of NWFP, Finance Department.

Order No. FD(PCR) 1-1/89

Dated Peshawar, the 29.8.1992.

Copy forwarded to the Accountant General, NWFP, Peshawar for information and necessary action.

( GHULAM DASTGIR ANWAR )  
Additional Secretary (Regulation),  
Govt. of NWFP, Finance Department.

Order No. FD(PCR) 1-1/89

Dated Peshawar, the 29.8.1992.

Copy forwarded for information to:-

- 1. The Secretary to Government of the Punjab, Finance Department, Lahore.
- 2. The Secretary to Government of Sindh, Finance Deptt. Karachi.
- 3. The Secretary to Government of Baluchistan, Finance Department, Quetta.
- 4. The Finance Secretary, Azad Government of the State of Jammu and Kashmir, Muzaffarabad.

( TASEER JAHAN ALI )  
Deputy Secretary (Regulation),  
Finance Department.

Encl: No. 9 (200) 1-1/82

Date: Peshawar, the 20<sup>th</sup> Nov. 1972

Copy Forwarded for Information to:-

1. All the District/Agency Accounts Officer in W.P.
2. The Treasury Officer, Peshawar.
3. The Private Secretary to Finance Minister, NWFP.
4. The Private Secretary to Finance Secretary, NWFP.
5. All P.A.s. to Additional Secretaries/Deputy Secretaries in Finance Department.
6. All the Section Officers/Budget Officers in Finance Department, Peshawar.

TESTED

*Balwant B...*  
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*Shaker Ullah*  
 Section Officer (Finance)  
 Finance Department,

Attested  
 19/11/72  
*[Signature]*

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Dist.No. FD(PRC)1-1/89 Dated Peshawar, the 7th August, 1991.

Copy forwarded for information to:-

- 1. The Secretary to Government of Punjab, Finance Department, Lahore.
- 2. The Secretary to Government of Sindh, Finance Deptt, Karachi.
- 3. The Secretary to Government of Baluchistan, Finance Department, Quatta.

*Ghulam D. Stgir Akhtar*

(GHULAM D. STGIR AKHTAR)  
Deputy Secretary (Regulation)  
Finance Department.

Dist.No. FD(PRC)/1-1/89. Dated Peshawar, the 7th August, 1991.

Copy forwarded for information to:-

- 1. All District/Agency Accounts Officers in NWFP.
- 2. The Treasury Officer, Peshawar.
- 3. The Private Secretary to Finance Minister, NWFP.
- 4. The Private Secretary to Finance Secretary, NWFP.
- 5. PAs to Additional Secretaries/Deputy Secretaries in Finance Department.
- 6. All Section Officers/Budget Officers in Finance Department.

*Abdur Rashid*  
(ABDUR RASHID)  
Section Officer (PRC)  
Finance Department.

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*attested*  
**ATTESTED**  
*Ashraf Khan*

*Attested*  
*10/8/91*  
*[Signature]*

Endst. No. FD (PRC)/1-1/89 Dated Peshawar, the 7<sup>th</sup> August, 1991

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Copy forwarded for information to:-

1. The Secretary to Government of Punjab, Finance Department, Lahore.
2. The Secretary to Government of Sindh, Finance Department, Karachi.
3. The Secretary to Government of Baluchistan, Finance Department, Quetta.

(Ghulam Dastagir Akhtar)  
Deputy Secretary (Regulation)  
Finance Department

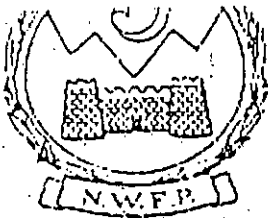
Endst. No. FD (PRC)/1-1/89 Dated Peshawar, the 7<sup>th</sup> August, 1991

Copy forwarded for information to:-

1. All District/Agency Accounts Officers in NWFP.
2. The Treasury Officer, Peshawar
3. The Private Secretary to Finance Minister, NWFP.
4. The Private Secretary to Finance Secretary, NWFP.
5. PA's to Additional Secretaries/Deputy Secretaries in Finance Department.
6. All Section Officers/Budget Officers in Finance Department.

(Abdul Rashid)  
Section Officer (PRC)  
Finance Department





GOVERNMENT OF NWFP  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 28-7-2009.

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NOTIFICATION.

No.50(PE)E&SED/Adv: Incr:/09. Consequent upon the judgement of August Supreme Court of Pakistan in CPLA No. 525 of 2007 and CPLA No. 526 of 2007, the Competent Authority has been pleased to declare that all other similarly placed teachers with the original appellant in the above mentioned cases shall also be entitled to the benefits of the Finance Department Notification vide circular letter No. F.D/PRC/1-1/89, dated 07-08-1991 and vide circular letter No. FD/PRC/1-1/88, dated 11-08-1991 with effect from the date of issue or with effect from date of acquiring higher qualification, which ever is later.

Secretary to Govt. of NWFP  
E&SE DEPARTMENT.

Endst. Of even No. & date.

Copy is forwarded to:-

- ✓ 1. The Secretary to Government of NWFP, Finance Department Peshawar.
- ✓ 2. The Secretary to Government of NWFP, Establishment & Administration Department, Peshawar.
- ✓ 3. The Secretary to Government of NWFP, Law Department.
- ✓ 4. The Director Elementary & Secondary Education NWFP, Peshawar.
- ✓ 5. The Director Curriculum & Teacher Education NWFP, Abbotabad.
- ✓ 6. The Director PITE, NWFP, Peshawar.
- ✓ 7. The Director Education FATA, Peshawar.
- ✓ 8. The Accountant General NWFP Peshawar.
- ✓ 9. All District Accounts Officers in NWFP.
- ✓ 10. All Executive District Officers (E&SE) in NWFP.
- ✓ 11. All District Coordination Officers in NWFP.
- ✓ 12. Registrar Supreme Court of Pakistan, Islamabad.
- ✓ 13. Registrar Peshawar High Court, Peshawar.
- ✓ 14. Registrar NWFP Service Tribunal Peshawar.
- ✓ 15. P.S.O to Chief Minister NWFP.
- ✓ 16. P.S to Chief Secretary NWFP.
- ✓ 17. P.S to Additional Chief Secretary (FATA) Civil Secretariat FATA, Peshawar.
- ✓ 18. P.S to Minister for Education NWFP.
- ✓ 19. P.S to Secretary Elementary & Secondary Education Department.
- ✓ 20. Section Officer (Litigation) E&SE Department.

29-07-09

27/7/09

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27/7/09

Attested

ARIF JAMIL)  
OFFICER (PRIMARY



**GOVERNMENT OF**  
**KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

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Dated Peshawar, 11.07.2012

**NOTIFICATION:**

**No. SO (B & A) /1-18/E&SE/2012:** Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Sr. No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	one thirds (1/3 <sup>rd</sup> ) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

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12.	Physical Education Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PETs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total PETs posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qaria	"do"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
15.	Sr.Qari/Sr.Qaria	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	One thirds (1/3 <sup>rd</sup> ) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.
3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the \_\_\_\_\_ 2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.  
All District Account Officers

SECTION OFFICER (FR)  
FINANCE DEPARTMENT

Endst. Of even Number & Date:

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

(NOOR ALAM KHAN WAZIR)  
SECTION OFFICER (B&A)  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Attested

**OFFICE OF THE DISTRICT EDUCATION OFFICER MALE DIR LOWER AT TIMERGARA****Office Order***better copy*

Consequent upon promotion of Certified Teachers (CT's) Male B-15 to Senior Certified Teachers (SCT) Male B-16 on regular basis as Notified vide Director Elementary & Secondary Education Khyber Pakhtunkhwa No.3786-92/File No.2/Promotion Senior CT BPS-16 Dated Peshawar the 21/09/2016, the following Male CT's are hereby adjusted in the Schools noted against their names in the interest of Public Service from the date of issue.

S#	Name of Teacher (SCTs)	BPS	Present Station	Place of Posting	Remarks
1	Fazal Rahim	16	GMS Shontala	GHS Shontala	A.V Post
2	Mahfoozul Haq	16	GMS Qandar	GHS Sadbar kalay	A.V Post
3	Mohammad Farooq	16	GHS Darangal	GHS Darangal	Post Already occupied
4	Dilawar Shah	16	GHSS Munda	GHSS Munda	Post Already Occupied
5	Habibullah	16	GMS Tekni Bala	GHS Sla Warghar	A.V Post
6	Saeed Ur Rehman	16	GMS Sherkhani	GHSS Lal Qila	A.V Post
7	Bakht Munir Khan	16	GMS Kotkay Palkhail	GHS Shalkandi	A.V Post
8	Fazal Rahim	16	GHS Pato Talash	GHS Pato Talash	Post Already Occupied
9	Jehangir Khan	16	GMS Mator Asbanr	GHS Tazagram	A.V Post
10	Said Wali	16	GHS Kamala	GHS Kamala	Post Already Occupied
11	Bakht Roz Khan	16	GHS Rani	GHS Rani	Post Already Occupied
12	Khair Ur Rehman	16	GHS Dheri Kambat	GHS Dheri Kambat	Post Already Occupied
13	Hidayat Ul Haq	16	GMS Banr	GHS Mian Kalay	A.V Post
14	Sahib Razzaq	16	GHS Makhai	GHS Makhai	Post Already Occupied
15	Mohammad Ikram	16	GMS Balambat	GGMHS Timergara	A.V Post
16	Nake Mohammad	16	GHSS Tawda China	GHSS Tawda China	Post Already Occupied
17	Mohammad Rahim	16	GMS Shato	GGMHS Timergara	A.V Post
18	Abdul Hanan	16	GHSS Khazana	GHSS Khazana	Post Already Occupied
19	Israr Ud Din	16	GHS Spina Khawra	GHS Spina Khawra	Post Already Occupied
20	Mohim Badshah	16	GMS Bakht Bilanda	GHSS Mian Brangola	A.V Post
21	Said Malook	16	GHS Khanpur	GHS Khanpur	A.V Post
22	Mohammad Pervez	16	GMS Barjam Makhai	GHS Makhai	A.V Post
23	Abdul Hamid Jan	16	GMS Barjam Makhai	GHSS Khazana	A.V Post
24	Israr Ud Din	16	GHS Koherai	GHS Koherai	Post Already Occupied
25	Aslam Hussain	16	GHSS Hayasen	GHSS Hayasen	Post Already Occupied
26	Abdul Manan	16	GHS Spina Khawra	GHS Spina Khawra	Post Already Occupied
27	Liaqat Ali Khan	16	GMS Shah Alam Baba	GHS Tazagram	A.V Post
28	Nasir Ud Din	16	GMS Mator	GHS Sebsada	A.V Post
29	Saeed Ul Haq	16	GMS Darangal	GHS Kambat	A.V Post

# Annex "I"

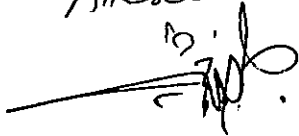
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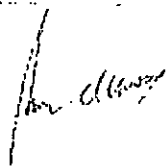
## OFFICE OF THE DISTRICT EDUCATION OFFICER MALE DIR LOWER AT TIMERGARA

### Office Order

Consequent upon promotion of Certified Teachers (CTs) Male B-15 to Senior Certified Teachers (SCT) B-16 on regular basis as Notified Vide Director Elementary & Secondary Education Khyber Pakhtunkhwa No.3786-92/File No.2/Promotion Senior CT BPS-16 Dated Peshawar (Dy) 21/09/2016, the following Male CTs are hereby adjusted in the schools noted against their names in the interest of public service from the date of issue

Sr	Name of Teacher (SCTs)	BPS	Present Station	Place Of Posting	Remarks
1	Fazal Rahim	16	GHS Shontala	GHS Shontala	A.V. Post
2	Mahfoozul Haq	16	GMS Gandara	GMS Sadhar Lalay	A.V. Post
3	Mohammad Farooq	16	GHS Darangal	GHS Darangal	Post already occupied
4	Ohawar Shah	16	GMS Munda	GMS Munda	Post already occupied
5	Habibullah	16	GMS Tekni Bala	GMS Sia Warghar	A.V. Post
6	Saeed Ur Rahman	16	GMS Sheerkhani	GMS Lal Bala	A.V. Post
7	Bakht Munir Khan	16	GMS Kotray Paikhal	GMS Shuffandi	A.V. Post
8	Fazal Rahim	16	GHS Pato Talash	GHS Pato Talash	Post already occupied
9	Zehangir Khan	16	GMS Mateer Asbanr	GHS Tazagram	A.V. Post
10	Said Wali	16	GHS Kamala	GHS Kamala	Post already occupied
11	Bakht Ror Khan	16	GHS Rani	GHS Rani	Post already occupied
12	Khair Ur Rahman	16	GHS Dhori Kambhat	GHS Dhori Kambhat	Post already occupied
13	Hidayat Ul Haq	16	GMS Bari	GHS Man Kalay	A.V. Post
14	Sahib Kazag	16	GHS Malhar	GHS Malhar	Post already occupied
15	Mohammad Ikram	16	GMS Baram Bala	GMS Timergara	A.V. Post
16	Naseer Mohammad	16	GMS Tawda China	GMS Tawda China	Post already occupied
17	Mohammad Rahman	16	GMS Shala	GMS Timergara	A.V. Post
18	Abdul Hanan	16	GMS Khazana	GMS Khazana	Post already occupied
19	Israrud Din	16	GMS Spina Khawra	GMS Spina Khawra	Post already occupied
20	Mohini Badshah	16	GMS Bkhl Bilinda	GMS Main Brangola	A.V. Post
21	Sad Malook	16	GMS Khanpur	GMS Khanpur	A.V. Post
22	Mohammad Pervez	16	GMS Barjam Makhi	GMS Makhi	A.V. Post
23	Abdul Hamid fan	16	GMS Barjam Makhi	GMS Khazana	A.V. Post
24	Israrud Din	16	GMS Kohera	GMS Kohera	Post already occupied
25	Aslam Hussain	16	GMS Hayaseri	GMS Hayaseri	Post already occupied
26	Abdul Manan	16	GMS Spina Khawra	GMS Spina Khawra	Post already occupied
27	Lugat Ali Khan	16	GMS Shan Alam Baba	GMS Tazagram	A.V. Post
28	Nasiruddin	16	GMS Mator	GMS Schanda	A.V. Post
29	Saeedul Haq	16	GMS Darangal	GMS Kambhat	A.V. Post
30	Bakht Shah Zeb	16	GMS Man Banda	GMS Man Banda	Post already occupied
31	Rafiq Ahmad	16	GMS Koto	GMS Tangi Timergara	A.V. Post
32	Ishakullah	16	GMS Asharser	GMS Samarbagh	A.V. Post
33	Aziz Ul Hakeem	16	GMS Mumai	GMS Mumai	Post already occupied
34	Said Mohammad	16	GMS Mayar Khadagari	GMS Mayar Khadagari	Post already occupied
35	Fazal Sarfar	16	GMS Tekni Bala	GMS Tazagram	A.V. Post
36	Sardar Ul Malik	16	GMS Haji Abad	GMS Haji Abad	Post already occupied
37	Asghar Ali	16	GMS Gul Muzam	GMS Chakdara	A.V. Post
38	Hassan Gul	16	GMS Pingal	GMS Pingal	Post already occupied
39	Fazal Nazam	16	GMS Sangwalaj	GMS Sangwalaj	Post already occupied
40	Khazan Gul	16	GMS Tawda China	GMS Tawda China	Post already occupied
41	Ghulam Rahman	16	GMS Mayar Khadagari	GMS Mayar Khadagari	Post already occupied
42	Muhammad Ayoub	16	GMS Hayaseri	GMS Hayaseri	Post already occupied

Attested  
by  




30	Bakht Shah Zeb	16	GHS Mian Banda	GHS Mian Banda	Post Already Occupied
31	Rafiq Ahmad	16	GMS Koto	GHSS Tangi Timergara	A.V Post
32	Ihsan Ullah	16	GMS Asharkot	GHSS Samarbagh	A.V post
33	Aziz UI Hakeem	16	GHS Munjai	GHS Munjai	Post Already Occupied
34	Said Mohammad	16	GHS Mayar Khadagzai	GHS Mayar Khadagzai	Post Already Occupied
35	Fazal Sardar	16	GMS Tekni Bala	GHS Tazagram	A.V Post
36	Sardar UI Mulk	16	GHS Haji Abad	GHS Haji Abad	Post Already Occupied
37	Asghar Ali	16	GMS Gul Muqam	GHSS Chakdara	A.V Post
38	Hassan Gul	16	GHS Pingal	GHS Pingal	Post Already Occupied
39	Fazal Naeem	16	GHS Sangwalai	GHS Sangwalai	Post Already Occupied
40	Khazan Gul	16	GHSS Tawda China	GHSS Tawda China	Post Already Occupied
41	Gul Rehmat	16	GHS Mayar Khadagzai	GHS Mayar Khadagzai	Post Already Occupied
42	Mohammad Ayoub	16	GHSS Hayasen	GHSS Hayasen	Post Already Occupied
43	Shah Faisal	16	GHSS Khairabad	GHSS Khairabad	Post Already Occupied
44	Ubaid Ur Rehman	16	GHS Qaalgai	GHS Qaalgai	Post Already Occupied
45	Asad Ullah	16	GMS Khaikar	GGMHS Timergara	A.V Post
46	Abdul Hafiz	16	GSSHSS Ouch	GSSHSS Ouch	Post Already Occupied

better copy

**Note:-**

1. Terms and Conditions will remain the same as mentioned in the Notification referred above.
2. Charge will be taken in fortnight.

(Dr. Hafiz Muhammad Ibrahim)  
District Education Officer (M)  
District Dir Lower

Endst: No.15338-42

Dated Timergara the 22/10/2016

Copy forwarded for information and necessary action to the:

1. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, District Dir Lower.
3. All the Principal/Head Masters concerned.
4. Officials concerned
5. M/File

District Education Officer  
(M) District Dir Lower

(27)

Sr	Name of Teacher (SCTs)	BPS	Present Station	Place Of Posting	Remarks
43	Shah Kasar	15	GSSS Muzrabad	GSSS Muzrabad	Post already occupied
44	Ubaidee Rahman	16	GHS Qagal	GHS Qagal	Post already occupied
45	Asad Ullah	15	GMS Kharkar	GCMHS Timergara	A.V Post
46	Abdul Hafiz	16	GSSS Dugh	GSSS Dugh	Post already occupied

**Note:**

1. Terms and condition will remain the same as mentioned in the notification referred to above.
2. Charge will be taken in fortnight.

(Dr. Hafiz Muhammad Ibrahim)  
 District Education Officer  
 (M) District Dir Lower.

Endr. No. 15338-42

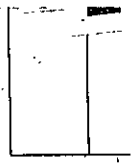
Dated Timergara the 22/10/2016.

Copy forwarded for information and necessary action to the:-

1. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Account Officer District Dir Lower.
3. All the Principal/ Head Masters Concerned.
4. Officials Concerned.
5. M/File.

*[Signature]*  
 District Education Officer  
 (M) District Dir Lower.

*Attested to*  
*[Signature]*



1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether a service counts for pension under Art. 311 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "ps"	Date of appointment	Signature of Government Servant
ET GHS Sorsing Dirk,	Temp	Yearly Pay Rs. 8500-700-29500	Rs. 8500/1000	Rs. 2200/- pm		17/11/11	[Signature]
- Do -	Temp	Temp Rs. 8500/1000				7/12/11	[Signature]
- Do -	- Do -	Rs. 9200/- pm				12/12/11	[Signature]
- Do -	- Do -	Rs. 9900/- pm				12/12/11	[Signature]
						12/12/11	[Signature]
						12/12/11	[Signature]
						12/12/11	[Signature]
						12/12/11	[Signature]
						12/12/11	[Signature]
						12/12/11	[Signature]

DAWP PAY SCALE 5 2011  
 OFFICE OF THE ACCOUNTS OFFICER  
 GENERAL  
 KARNATAKA STATE GOVT. DEPT. OF  
 TRANSPORT  
 BANGALORE  
 GE QS  
 8500 10-283200  
 AT Rs. 8500/- pm  
 WITH NEXT PAY

Account Officer  
 9/1/13

Alestad  
 [Signature]



1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	Officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "P"	Date of appointment	Signature of Government Servant.
S.C.T G.H.S. Tawdachim	Temp	Temp	23560	17900/-		1 <sup>12</sup> / <sub>2016</sub>	[Signature]
Pay Revised	pay seal	Bps 16	(18910 - 1520)	64510			[Signature]
Do	do	do	28030	21440/-		1 <sup>7</sup> / <sub>2017</sub>	[Signature]
S.C.T G.H.S Pukhtamo Khadagzai	do	do	28030	21440/-		01 <sup>9</sup> / <sub>2017</sub>	[Signature]
Do	do	do	29550/-	22770/-		01 <sup>12</sup> / <sub>17</sub>	[Signature]
	do	do	31070/-	24400/-		01 <sup>12</sup> / <sub>2018</sub>	
12795/15							
16879/15							
21440/15							
<p>Head Master G.H.S P.Khadagzai District Dir/lower</p>			<p>2011 Produced</p>		<p>Allowed BPS-14 as per decision of pesh. High Court No: 150/2009 dt 7/10/2009 with all back benefit under rules sec-19 KP Civil Servant Act 1993 Ammendment Act 2005.</p>		
<p>Placed on leave with pay from 18-11-2011 to 1-2-2011</p>			<p>Approved by [Signature]</p>		<p>(HEAD MASTER) G.H.S.P.Khadagzai Distt Dir (Lower)</p>		
<p>Placed on leave with pay from 18-11-2011 to 1-2-2011</p>			<p>Approved by [Signature]</p>		<p>[Signature]</p>		

12795/15  
16879/15  
21440/15

Placed on leave with pay from 18-11-2011 to 1-2-2011

Attached to [Signature]

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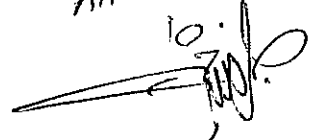
Signature of Government Servant.	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punish- ment or censure or praise of the Government Servant.	
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government			
						Period			Government to which debitible.
[Signature]	Principal GHSS Towda China Dir (L)							9 here by opt to fixed my pay in BPS 16 after availing A/A BPS 15 on 11/2/2016	
[Signature]	Principal GHSS Towda China Dir (L)	30/6/17	pay Revised	[Signature]				Promoted from CT to SET BPS=16 vide Director Elementary & SE KPK Peshawar office Endst No 3786-92	
[Signature]	Principal GHSS Towda Chi- Dir (L)	31/8/17	Transferred	[Signature]				File No 2 promotion SET BPS 16 dated Peshawar the 21/09/2016 Further adjustment ordered DEO (M) Dir (L) at timergara / No 15338-42 dated 27/10/2016	
[Signature]	Head Master, GHS P.Khadagzai Dir (L)	30/11/17	A/A MC	[Signature]				7 961	
[Signature]	Head Master, GHS P.Khadagzai	28/11/17		[Signature]				Ann of pay adjustment on all of promotion to SET B-16 with pay Ann Rs. 23560/- on 1-12-16	
[Signature]	[Signature]	31/17		[Signature]				Attest [Signature] 19/11/17	
[Signature]	[Signature]			[Signature]				Service verified: w-e-f-2/12/16 to 31/8/17 from the office head	
[Signature]	[Signature]			[Signature]				Principal GHSS Towda China Dir (L)	

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9	10	11	12	13		14	15
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
	Office of the Accountant General Peshawar Khyber Pakhtunkhwa Pay Fixed in the Revised Basic Pay Scales 10985-905-3835 Pay Fixed @ Rs. 12235/- R.B.P.S. 13 Pay Fixed @ Rs. 16870/- R.B.P.S. Pay Fixed @ Rs. 21480/- Date of Next increment due on 01-07-2015	General w.e.f 01-07-2015				Head Master GHS P. Khadagzal Dir	Service Verified W.e.f 01-09-2017 to 30-11-2018 from the office Record of this School.
	Accounts Officer Pay Fixation Party Peshawar					Head Master GHS P. Khadagzal Dir	Pay given Rs. 2203700/- w/ transfer to GHS P. Khadagzal Dir on 1-9-2017
							888 8/9/17
							Attested Kling Head Master GHS P. Khadagzal District Dir lower
							Attested 27/9/17

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 - C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
CT (Agric)		pay fixed in	B-15	(8500-700-29500)			
GHS Shorshing		pay in B-15	Rs. 9200/pm			17/12/2012	3th G
Cutting attested Do		pay is B-15	Rs. 9300/pm	9200		17/12/2012	3th G
CT (Agric)	Temp	Temp	Temp	Rs. 9200/-		04/01/2014	3th G
GHS Toudacheena				(9900) pm			
<p>Pay Revised due to allowing one pre-mature increment on all of upgradation from Bps-14 to Bps-15 vide - FD(SO-SR-1) 2-123/2014 dt 30/5/2014 w.e.f 1-12-2012</p>							
				9220/-			3th G
				8500/-	(10600)		with one pre-mature increment
				9200/-	(11300)		
C.T	Temp	Temp	Temp	9200/-		12/2013	3th G
GHS Tawda Chins				(11300)			
do	do	do	do	10600/-		12/2013	3th G
				Rs. (12500) pm		12/2014	3th G

Attested  
  
 Head Master  
 G.H.S P.Khadagzei  
 District Dir lower

Attested  
 10.  




1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
Pay Revised vide Finance Deptt. Letter No. FD(PRC) 1-1/2015 C.T. G.H.S. Tawdala Chinze	Temp	Temp	10670/-	3900/-		12/2014	Dated, 27/12/2015 3th E
Revised pay scale		BPS No. 15 (10985-905)					38135
do		12795/-	15510/-			12/2015	3th E
do		13700/-	16415/-			12/2015	3th E
Pay Revised vide finance Deptt. Letter No. FD(PRC) 1-1-2016 C.T. G.H.S. Tawdala Chinze	Temp	Temp	16415/-			12/2015	3th E
Pay Revised pay Scales. BPS=15		(13510-1120-47110)					
do	do	do	20230/-	16870		7/2016	3th E
Do	Do	Do	17890	21350/-		11/18/2016	
B-pay scale revised in B-16 i.e. 15880-1250-54280 due to promotion from BPS 15 to BPS 16 w.e. from 2/12/2016							3th E
Altes	pay on 1-12-2016 B-15, 21350- pay fixed in B-16						3th E
			19720/-	23560/-			(with previous m.)

Head Master  
G.H.S. P.Khadagzal  
District Dir lower

Attested  
*[Signature]*

Nature of Government Servant	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.	
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period			Government to which debitable
27/12/2014	Saw PRINCIPAL GHSS, Towda China District Dir (Lower)	30-6-2015	Pay Revised	Saw PRINCIPAL GHSS, Towda China District Dir (Lower)			Allowed one pre-mature increment on date of upgradation from BPS-14 to BPS-15 vide FD (S- SR-1) 2-123/2014 dt 30/5/2014 w.e.f 17/12/2012		
25	Saw PRINCIPAL GHSS, Towda China District Dir (Lower)	30-11-2015	Alms	Principal GHSS, Towda China Dir (L)					
25	Saw Principal GHSS Towda China Dir (L)							Principal GHSS Towda China Dir (L)	
2016	Saw Principal GHSS Towda China Dir (L)	30-6-2016	Pay Revised						
2016	Saw Principal GHSS Towda China Dir (L)	30-11-2016	Alms	Principal GHSS Towda China Dir (L)					
	Saw Principal GHSS Towda Ch. Dir (L)	Promoted to BPS-16	Alms	Saw Principal GHSS Towda China Dir (L)			Service Verified from office record w.e.f 3/7/2015		
	Saw Principal GHSS Towda Ch. Dir (L)								
	Saw Principal GHSS Towda China Dir (L)								
	Saw Principal GHSS Towda China Dir (L)								
	Attested			Head Master G.H.S. P. Khadacz District Dir lower			Service Verified w.e.f (04/01/2014 to 1-12-2016) from the office record	Principal GHSS Towda Ch. Dir (L)	

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8/9/15  
Dowlam - 1 PM - 100  
WBR 1/6/15 8/15  
Amount Rs = 51500  
Pay Advic Rs = 11300/ea  
WBR - 8-2015  
15

ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 18-01-2011.

NOTIFICATION

NO.50(PI)4-5/SSRC/Vol.III. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and supersession of all the notifications issued in this behalf, the Elementary & Secondary Education Department, in consultation with 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.

SECRETARY TO GOVT. OF KHYBER  
PAKHTUNKHWA  
ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT.

Endst. No. & Date as above.

Copy forwarded to:-

- 1- Secretary to Govt. of Khyber Pakhtunkhwa, Establishment & Admn. Department.
- 2- Special Secretary (Regulation), Establishment & Admn. Department.
- 3- Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
- 4- Secretary to Govt. of Khyber Pakhtunkhwa Law Department w/r to his letter No. REG: 1(3)77/E&SE dated 05-01-2011.
- 5- Secretary to KPK Public Service Commission Khyber Pakhtunkhwa Peshawar Cantt.
- 6- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 7- Director Elementary & Secondary Education Khyber Pakhtunkhwa.
- 8- Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 9- Director Curriculum & Teachers Education Abbottabad.
- 10- Director Education (FATA) Khyber Pakhtunkhwa Peshawar.
- 11- Director ESRU, Khyber Pakhtunkhwa Peshawar.
- 12- All EDOs (E&SE) in Khyber Pakhtunkhwa.
- 13- All Agency Education Officers in Khyber Pakhtunkhwa.
- 14- All District Accounts Officers/All Agency Accounts Officers in Khyber Pakhtunkhwa.
- 15- P.S to Governor, Khyber Pakhtunkhwa Peshawar.
- 16- P.S to Chief Minister, Khyber Pakhtunkhwa Peshawar.
- 17- P.S to Chief Secretary, Khyber Pakhtunkhwa Peshawar.
- 18- P.S to Minister E&SE Department.
- 19- P.S to Secretary E&SE Department.
- 20- P.S to Additional Secretary E&SE Department.
- 21- P.S to Deputy Secretary (Admn.)/DS-II, E&SE Department.
- 21- Teachers Concerned.

(MOHAMMAD NAFEES)  
SECTION OFFICER (PRIMARY)

Attested



Teacher  
0344-9171907

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Appendix

No.	Nomenclature	Minimum Qualification & Experience for initial Appointment on Transfer	Age Limit	Method of Recruitment
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 group from a recognized University (ii) M.A in Education or Bachelor's Degree in Education from a recognized University	18 to 35 Years	<p>5.</p> <p>(a) Fifty Percent by Promotion, on the basis of Seniority Cum Fitness in following manner: (i) Forty Percent from amongst the Certified Teachers (Gen Certified Teachers (Agriculture). Certified Teachers (Indu Arts) and Certified Teachers (Home Economics) with at least Five years Service as such and having qualification mentioned in Column No.3 (ii) Four Percent from amongst the Drawing Masters with at least Five years experience as such and having qualification mentioned in Column No.3 (iii) Four Percent from amongst the Physical Education Teachers with at least Five years Service as such and having qualification mentioned in Column No.3. (iv) One Percent from amongst the Instructional Medical Science with at least Five years service as such and having qualification mentioned in Column No.3. (v) One Percent from amongst the Arabic Teachers with at least Five Years Service and having qualification mentioned in Column No.3 (b) Fifty Percent by Initial Recruitment</p>
2.	Arabic Teacher (BPS-15)	(i) Second Division in Secondary School Certificate from a recognized Board with Shahdat Ul Alamia Fil Uloomul Arabia Wal Islamia from a recognized Tanzimul Wafaqul Madaris or (ii) Second Class Master's Degree in Arabic from a recognized University	18 to 35 Years	<p>(a) Twenty Five Percent by Promotion on the basis of Seniority Cum Fitness from amongst the Theology Teachers of the concerned Districts with at least Five Years Service as such and having qualification mentioned in Column No.3 Provided that if no suitable candidate is available for promotion then by initial recruitment and (b) Seventy Five Percent by initial recruitment</p>
3.	Theology Teacher (BPS-14)	(i) Second Division in Secondary School Certificate from a recognized Board with Shahdat Ul Aalia from a recognized Tanzimul Wafaqul Madaris or Degree with Two subjects as Islamic Studies and Arabic from a recognized University and Shahdat Ul Khasa from a recognized Tanzimul Wafaqul Madaris.	18 to 35 Years	<p>(a) Twenty Five Percent by Promotion, on the basis of Seniority Cum Fitness from amongst the concerned Districts with at least Five Years Service as such and having qualification mentioned in Column No.3 (b) Seventy Five Percent by initial Recruitment</p>

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APPENDIX

No.	Nomenclature.	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 or equivalent group from a recognized University and (ii) M.A in Education or Bachelor's Degree in Education from a recognized University.	18 to 35 years.	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, in following manner: (i) forty per cent from amongst the Certified Teachers (Gen Certified Teachers (Agriculture), Certified Teachers (Inde Artist and Certified Teachers (Home Economic) with at least years' service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing Masters with at least 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; (iv) one per cent from amongst the Instructional Material with at least five years service as such and having qualification mentioned in column No. 3; and

*[Handwritten signature]*

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*[Handwritten signature]*

<p>1. Theology Teacher (BPS-14)</p>	<p>(i) Second Division in Secondary School Certificate from a recognized Board with Shahadatul A'la, from a recognized Tanzeemul Wafaqul Madaris, or</p>	<p>18 to 35 years.</p>	<p>(a) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the teachers of the concerned districts with atleast five years service as such and having qualification mentioned in Column No. 3.</p> <p>(b) seventy-five per cent by initial recruitment.</p>
<p>2. Arabic Teacher (BPS-15)</p>	<p>(ii) Second Division in Secondary School Certificate, from a recognized board with Shahadatul A'la, from a recognized Tanzeemul Wafaqul Madaris, or</p> <p>(iii) Second Class Masters Degree in Arabic from a recognized University.</p>	<p>18 to 35 years.</p>	<p>(a) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Theology Teachers of the concerned districts with atleast five years service as such and having qualification mentioned in column No. 3.</p> <p>Provided that if no suitable candidate is available for promotion, then by initial recruitment, and</p> <p>(b) seventy-five per cent by initial recruitment.</p>

(4)

*Signature*

*Attested*

	Instruction Material Specialist (BPS-11)	(i) Bachelor's Degree from a recognized University and (ii) Primary School Teaching Certificate with Certificate in Instructional Material Development	18 to 35 Years	By initial Recruitment <i>better copy</i>
5.	Qari (BPS-09)	Secondary School Certificate with Hafiz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 Years	By initial Recruitment
6.	Certified Teacher (General) BPS-09	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher Certificate or with Two years Diploma in Education	18 to 35 Years	(a) Sixty Percent by Promotion, on the basis of Seniority Cum Fitness from amongst the Primary School Teachers of the concerned districts with Five years Service as such and having qualification mentioned in Column No.3 (b) Forty Percent by initial recruitment.
7.	Industrial Arts (BPS-09)	Bachelor's Degree from a recognized University with Two years training in Technical subjects from any Government Industrial or Technical Vocational Institute or Centre or (ii) Bachelor's Degree from a recognized University with Nine months training from any Government Agro Technical Teacher Training Center of the level of Certificate Teacher Agro technical (Industrial Arts)	18 to 35 Years	(a) Sixty Percent by Promotion, on the basis of Seniority Cum Fitness from amongst the Primary School Teachers of the concerned districts with Five years Service as such and having qualification mentioned in Column No.3 (b) Forty Percent by initial recruitment.
8.	Certified Teacher (Agriculture) BPS-09	(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 Certified Teacher Agro Technical (Agriculture) or	18 to 35 Years	(a) Sixty Percent by promotion, on the basis of Seniority Cum Fitness from amongst the Primary School Teachers of the concerned districts with Five years Service as such and having qualification mentioned in Column No.3 (b) Forty Percent by initial recruitment.

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		Degree with two subjects as Islamic Studies and Arabic from a recognized University and Shalihatul Khasa from a recognized Tanzimatul Wafaqul Madaris.		
4.	Instructional Material Specialist (BPS-11).	(i) Bachelor's Degree from a recognized University; and Primary School Teaching Certificate with Certificate in Instructional Material Development.	18 to 35 years.	By initial recruitment.
5.	Qari (BPS-09)	Secondary School Certificate with Hafiz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.
6.	Certified Teacher (General) (BPS-09).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher Certificate or with two years Diploma in Education.	18 to 35 years.	(a) Sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Teachers of the concerned districts with five years service as such and having qualification mentioned in Column No. 3; (b) forty per cent by initial recruitment.

Attested

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K 12

(4)

	(Industrial Arts) (BPS-09) <i>18/01/2011</i> <i>18/01/2011</i>	Bachelor's Degree from a recognized University with two years training in technical subjects from any Government Industrial or Technical Vocational Institute or Center; or (ii) Bachelor's Degree from a recognized University with nine months training from any Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro technical (Industrial Arts).	18 to 35 years	(a) Sixty per cent by promotion on the basis of seniority-cum-fitness, from amongst the Primary School Teachers of the concerned districts with atleast five years service as such and also having qualification mentioned in Column No. 3; and (b) forty per cent by initial recruitment.
8.	Certified Teacher (Agriculture) (BPS-09)	(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 Certified Teacher Agro Technical (Agriculture); or	18 to 35 years	(a) Sixty per cent by promotion on the basis of seniority-cum-fitness, from amongst the Primary School Teachers of the concerned districts having atleast five years service as such and having qualification mentioned in Column No. 3; and (b) forty per cent by initial recruitment.

Attested  
*[Signature]*

"K 13" 42

	<p>Handwritten notes: <i>5/15/13</i> and a signature.</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 University with nine months training from Government Agro teacher training center of the level of Certified Teacher Agro-technical (Agriculture).</p>	<p>(K)</p>
9.	<p>Certified Teacher (Home Economics) (B18-69).</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 subject, from any Government Training School or College with Bachelor's Degree; or</p>	<p>18 to 35 years.</p> <p>(a) Sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers of the concerned districts with at least five years service as such having qualification mentioned Column No. 3; and</p> <p>(b) forty per cent by initial recruitment.</p>

Altered to [Signature]

(43)

"K14"

*Handwritten signature*

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(5)

*Attested*  
*Handwritten signature*

10.	Drawing Master (BPS-09).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	<p>(a) Twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers of the concerned districts with atleast five years service as such and having qualification mentioned in Column No. 3; and</p> <p>(b) eighty per cent by initial recruitment.</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 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 Certified Teacher Agro Technical (Home Economics).</p>		



(44)

KIS

(7)

11. Physical Education Teacher (BPS-09)	Bachelor's Degree from a recognized University with one year Junior Diploma in Physical Education Course or army equivalency other equivalent qualification.	1 years.	<p>(a) Twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Teachers of the concerned district with atleast five years service as such and having qualification mentioned in Colum No. 3 and</p> <p>(b) eighty per cent by initial recruitment.</p>
12. Primary School Teacher (BPS-07)	<p>Intermediate or equivalent qualification from a recognized Board with Primary School Teaching Certificate/Diploma in Education from a recognized Institute; or</p> <p>(ii) Secondary School Certificate from a recognized Board in second Division with three years Diploma in Elementary Education from a recognized Institute.</p>		<p>(a) Sixty per cent by initial recruitment on merit at District level; and</p> <p>(b) forty per cent by initial recruitment on merit at Union Council level.</p> <p>Provided that if no suitable candidate is available for a particular Union Council, then from the District merit list.</p>

Altered

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

To

The Account General  
Khyber pukhtunkhwa Peshawar.

Subject; APPLICATION TO CONSIDER CT BPS 14 LEGAL

Respected Sir

It is respectfully stated that I am serving in education department as ct .I applied for CT (agriculture) post following the advertisement published in various news paper advertised by DEO Dir Lower in 2008. The interview was conducted but the appointment under was not issued due to some unknown reasons. We filed a case against the delay in Peshawar high court and the court directed the DEO to issue the appointment order. The DEO signed the appointment ordered on 06/03/2011. All the CT teachers were appointed in Bps 09 as per rules. Then all those teachers who had BA qualification were upgraded to BPS-14.

The pay fixation party recently visited Distt Dir lower and objection on awarding BPS- 14. The same party remarked that you have been appointed after 18/01/2011 and awarding Bps 14 is not legal according to news rules of department. But I was recommended as ct teacher in 2009 before the new rules. So the new rules may not be applied to my appointment. Already in 2013 the pay fixation party checked my service and declared that the entry in service book is correct. So it is requested that my up gradation to bps 14 may be declared legal.

I will be very thankful to you for such act of kindness.

Thanks

*ZHWG*  
Yours obediently  
Khazan gul SCT  
GHS P/Khadagzai  
Distt Dir lower.

Forwarded to the Accountant General  
Khyber Pukhtunkhwa for necessary  
action please

23/9/19.

*Ram*  
23/09/2019  
GHS, P/Khadagzai

No 3789

dated 24/09/2019

Attested

*[Signature]*

Annex "M"

46

NO PFPT-II/2019-20/47

DATE 12/11/2019

TO

The Accountant General.

Khyber Pakhtunkhwa,

Peshawar.

Attention: Accounts Officer (HAD)

Subject: Application to Consider CT BPS-14 Legal.

Please refer to your letter No- H-24(77) Dir Lower 986 Dated 06-11-2019 on the subject above.

(2) Mr. Khazan Gul SCT GHS P. Khadagzai District Dir Lower was appointed in BPS-09 vide office order No 3448-69 dated 07/03/2011 in the light of Secretary Elementary and Secondary Education notification SO (PF)4-5/SSRC/VOL.III Dated 18-01-2011(Copy Attached). More over the pay fixation party has only asked to produce the order/notification of finance dept showing that CT Agri:is entitled to B-14.

(3) The District Education Officer(M) Dir Lower has also been asked to produce the service books of those teachers who were appointed in the office order Endst: No 3448-69 dated 07/03/2011 (Copy attached) to verify the pay fixation carried out by pay fixation party.

*sd-*

Accounts Officer  
Pay Fixation Party ii  
Camp at Dir Lower.

Copy Forwarded to:

- ✓ 1. District Education Officer Dir Lower.
2. MR. Khazan Gull SCT Headmaster GHS P. Khadagzai Dir Lower.

*Accounts Officer*

Accounts Officer  
Pay Fixation Party ii  
Camp at Dir Lower.

*Attested*  
*to*  
*[Signature]*

Annex "N" (47)



Office of the  
**Accountant General**  
Khyber Pakhtunkhwa Peshawar  
Phone: 091 9211250-53

No.H-24(77)/Dir Lower/919

Dated: 05.12.2019

To

MR. KHAZAN GUL SCT  
GHS P.KHADAGZAI  
DISTRICT DIR LOWER

Subject: APPLICATION TO CONSIDER CT BPS-14 LEGAL.

The undersigned is directed to enclose herewith a copy of letter No. PFPT-II/2019-20/47 dated 12.11.2019 of the Accounts Officer of Pay Fixation Party-II on the subject cited above along with its enclosure for necessary action at your end please.

ACCOUNTS OFFICER (HAD)




Copy to:

Head Master GHS P.Khadagzai District Dir Lower for information.

ACCOUNTS OFFICER (HAD)

:D/Abdullah/DAO Letter.docx

Attested

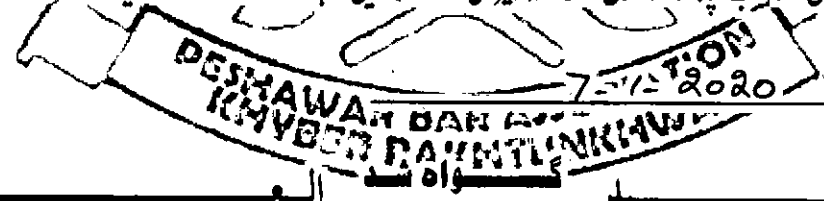
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ایڈوکیٹ: <i>کلیفٹن</i>		
بار کونسل ایسوسی ایشن نمبر: bc-14-4730		
رابطہ نمبر: 0313-9551364		پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سروس ٹریڈیوٹلے حیدر پختونخواہ اور

منجانب: ایڈوانٹ	دعویٰ:
خزان گل	علت نمبر:
بنام	مورخہ:
	جرم:
امام اللہ عبدالکریم KP	تھانہ:

**بابت تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کا روایہ متعلقہ  
 آن مقام لائسنس ور کیلے جاوے علی اعاصر جی نلیر محمد سعید ایڈووکیٹ کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل گرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے  
 المرقوم:



مقام: میان کالج، ضلع لوہاڑہ  
 4 ایلان گل سوسائٹی

مقام: *کلیفٹن* کے لیے منظور ہے۔

Accepted

*بیللہ*

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



OFFICE OF THE  
 DISTRICT EDUCATION OFFICER (MALE)  
 DIR LOWER AT TIMERGARA.  
 E- Mail: deomaledirlower@gmail.com. Tell: 0945-9250081-82

BEFORE THE KHYBER PALHTUNKHWA SERVICE TRIBUNAL PESHAWAR.  
 Appeal No. 716/2020

Mr. Khazan Gul.  
 Appellant.

Versus

Accountant General, Khyber Pakhtunkhawa Peshawar and others.  
 Respondents.

Para wise Comments on behalf of District Education Officer Dir Lower respondent  
 No.10

BEFORE THE KHYBER  
 Respectfully Sheweth.

Mr. Khazan Gul. The comments already offered by respondents No.1 & 5 may  
 also be considered comments of the Education Department respondent No.3, 4, 6,  
 8, 9, 10, & 11.

District Education  
 Officer (M) Dir Lower

Accountant General  
 Respondents  
 Para wise comments on  
 behalf of  
 District Education Officer  
 Dir Lower  
 No.10  
 Respectfully Sheweth  
 that the comments already  
 offered by respondents No.1 & 5 may  
 also be considered comments of the Education Department respondent No.3, 4, 6,  
 8, 9, 10, & 11.

15 May  
 2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.716/2020

.....Appellant.  
V/S

Accountant General Khyber Pakhtunkhwa Peshawar.....Respondent.

(Para wise reply on behalf of Respondent No.1 & 5)

**Preliminary Objection:-**

1. That the appellant has no locus standi and cause of action.
2. That the claim is not based on fact.
3. That the Appeal is based on malafied to be dismissed.
4. That the Appeal in hand is barred by law.
5. District Accounts Office Dir Lower is also necessary Party, which the appellant has not made as respondent.

**Respectfully Sheweth:-**

- Para :- 1      No comments.
- Para :- 2      No comments.
- Para :- 3      Relates to record, however liable to be proved by the appellant.
- Para :- 4      Relates to record, however liable to be proved by the appellant.
- Para :- 5      Relates to Respondent No.6 , hence no comments.
- Para :- 6      Relates to Respondent No.6 , hence no comments.
- Para :- 7      Relates to Respondent No.6 , hence no comments.
- Para :- 8      Relates to Respondent No.6 , hence no comments.

- Para:- 9 Incorrect, the Notification of Finance Department Peshawar vide No. F.D(PRC)1/89 dated: 07/08/1991 is not applicable to the appellant, because after the promulgation of revised service rules of Elementary & Secondary Education Department Peshawar Notification vide No. So (PF)4-5/SSRC/vol-III dated: 18/01/2011, the basic prescribed qualification was BA/BSE for BPS-09 instead to BPS-14. Hence the appellant is not entitled to BPS-14 under the rules.
- Para :- 10 Correct.
- Para:- 11 Relates to Respondent No.10, Hence no comments.
- Para:- 12 Relates to record, however liable to be proved by the appellant.
- Para:- 13 As mentioned in para "9" above to the extent that Respondent No.5 is bound to follow the rules and instructions issued by the Government of Khyber Pakhtunkhwa from time to time. Hence acted upon rightly under the rules.
- Para:- 14 As mentioned in para "9" above Respondent No.1 has no power to change or modify the rules or instructions issued by the provincial Government of Khyber Pakhtunkhwa.
- Para:- 15 As mentioned in para "9" above.
- Para:- 16 Correct and under the rules.
- Para:- 17 That Respondent No.5 has rightly acted upon under the rules and the pay of the appellant was fixed in BPS-09 on 01/07/2011 in light of Notification dated:18/01/2011 and was allowed BPS-15 w.e.f 01/07/2012 in light of Notification dated:11/07/2012
- Para:- 18 The action taken by the pay fixation party is correct and in accordance with Notification/standing order issued by the Government of Khyber Pakhtunkhwa Elementary & Secondary Education. The Pay Fixation Party has fulfilled their duty in accordance with provision of the Notification order issued by the Government of Khyber Pakhtunkhwa from time to time.

**GROUNDS:-**

- A. That Respondent No.5 is bound to follow the rules and instructions issued by the provincial government of Khyber Pakhtunkhwa from time to time. Hence rightly acted upon under the rules.
- B. As mentioned in Para "A" above.
- C. Correct.
- D. As mentioned in Para "9" above.



- E. As mentioned in Para "9" above.
- F. As mentioned in Para "9" above.
- G. Incorrect.
- H. As mentioned in Para "9" above the appellant is liable to be reverted to BPS under the rules. Over and above payments which the appellant have been received are liable to be reverted.
- I. That the orders/action taken by the Respondent No.5 is legal and under the rules.
- J. Incorrect, as mentioned in Para "9" above.

Keeping in view the above mentioned facts it is therefore humbly prayed that the appeal in hand having no merits may be dismissed with cost.

*Accountant*  
Accounts Officer  
Pay Fixation Party  
Camp at Peshawar.

for.   
ACCOUNTANT GENERAL  
KHYBER PAKHTUNKHWA