08<sup>th</sup> May, 2023

1. Learned Counsel for the appellant present. Mr. Fazal Shah Mohamand, Additional Advocate General for the respondents present.

2. Vide our detailed order of today placed in service appeal No. 1382/2019 titled "Usman Ghani Vs Government of Khyber Pakhtunkhwa through Secretary Education and others" (copy placed in this file), this appeal is also disposed of. Cost shall follow the event. Consign.



3. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this  $08^{th}$  day of May, 2023.

eeha Paul) (Fař Member (E)

\*Kaleem Ullah\*

(Kalim Arshad Khan) Chairman 13<sup>th</sup> April, 2023

Today this and connected appeals were brought by the Incharge of the pending files Branch. I was astonished to note that for what purpose the Reader had given such a long date in these appeals, which has caused quite long delay in disposal of these appeals. This act on the part of Reader has also paved way for a number of other aspersions on the reputation of the Tribunal, therefore, Mr. Pir Muhammad, Superintendent/working as Reader at the relevant point of time is called upon to explain his position as to why such act, of negligence, carelessness, inefficiency, irresponsible conduct was done by him and for the above acts why he should not be proceeded against under the relevant rules. His reply should reach the undersigned on 17.04.2023, the date given by him in the matters.

> (Kalim Arshad Khan) Chairman

\*Adnan Shah, PA\*

17<sup>th</sup> April, 2023

CANNEE

1. Counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Mr. Muhammad Zahid Khan, SDEO for the respondents present.



2. Arguments heard. Learned senior counsel for the appellant wants to make some more submission. He may do make on 08.05.2023 before the D.B. P.P given to the parties.

(Fareella Paul) Member (E)

(Kalim Arshad Khan) Chairman

\*\*Adnan Shah, PA

25<sup>th</sup> July, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Hussain Ali, Litigation Officer for respondents present.

It was pointed out that a number of other appeals on the same subject matter were fixed on different dates. It was, therefore, requested that all such appeals might be clubbed and heard together. This case is thus adjourned to  $\underline{t7} / \underline{04}/2022$  before the D.B. Learned counsel for the appellant is directed to submit an application to the Registrar of this Tribunal mentioning the details of all such appeals alongwith dates fixed therein within a week so that all such appeals could be fixed together with this appeal. On receipt of the application containing details of all similar appeal, the Registrar shall fix all those for the above date.

(Salah Ud Din) Member(Judicial)

(Kalim Arshad Khan) Chairman 27.07.2021

#### Counsel for the appellant present.

Mr.Javed Ullah, Learned Assistant Advocate General alongwith Mr. Hussain Ali, Litigation Officer (, for respondents present.

Learned counsel for the appellant seeks adjournment as he has not prepared the brief: Granted. To come up for arguments on 13.12.2021 before D.B.

DB is on Tous case to come up

For the same on Dated. 29.3.22

(Rozina Rehman) Member(J)

Chairman

Ruler

13.12.21

29-3-2022 Proper DB not available The case B adjourned tolome up for the Same es before on U-5 1: 2022 thy Reader

11-5-22 Proper DB net anialable The case Gadyunnal on 25-7-22

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#### 01.04.2021



Nemo for parties.

Kabir Ullah Khattak learned Additional Advocate General present.

Preceding date was adjourned on a Reader's note, therefore, both the parties be put on notice for  $\frac{14}{7}$  2021 for arguments, before D.B.

(Atiq ur Rehman Wazir) (Rozina Rehman) Member (E) Member (J)

14.07.2021

Appellant present through counsel.

Muhammad Adeel Butt learned<sup>1</sup> Additional Advocate General alongwith Hussain Ali Litigation Assistant for respondents present.

File to come up alongwith connected Service Appeal #.1230/2019 tilted Shamshad Khan Vs. Education Department on 27.07.2021 before D.B.

(Rozina Rehman) Member (J)

Chairman

06.08.2020

Junior counsel for the appellant is present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Hussain Ali, Litigation Officer for the respondents are also present.

Representative of the department submitted para-wise comments on behalf of respondents No. 1 to 3 which are placed on file. To come up for arguments on 26.10.2020 before D.B. The appellant may submit rejoinder within a fortnight, if so advised.

(MUHAMMAD JAMAL KHAN) MEMBER

#### 26.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 30.12.2020 for hearing before the D.B.

(Atiq-ur-Rehman Wazir) Member

Chairmar

#### 30.12.2020

Due to summer vacation, case is adjourned to 01.04.2021 for the same as before.

Reade

25.02.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Additional AG for the respondents present.

Learned Additional Advocate General requests for time to contact the respondents and furnished reply/comments on the next date of hearing. Adjourned. To come up for written reply/comments on 31.03.2020 before S.B.

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.



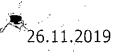
(Hussain Shah) Member

23.06.2020

Counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General on behalf of the respondents present.

The later requests for time to submit written reply/comments. Last chance is given. To come up for written reply/comments on 06.08.2020 before S.B.

Member



#### Counsel for the appellant present.

Contends that essentially the appellant was in the promotion zone for SST (BPS-16) at the time when Regularization Act, 2009 was promulgated. The Hon'able Peshawar High Court, Peshawar also observed, while disposing of C.O.C No. 105-P/2011 in writ petition No. 355/2011, that any employee/teacher was not promoted by the time when Act 2009 was enforced while he was in the promotion zone, was a question of fact to be determined in individual cases.

To resolve the controversy, instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 20.01.2020 before S.B.

Chairman

#### 20.01.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG requests for time to contact the respondents and furnish reply/comments on the next date of hearing. Adjourned to 25.02.2020 on which date the requisite reply/comments shall positively be furnished.

Chairr

#### Form- A

#### FORM OF ORDER SHEET

Court of

1239/2019 Case No.-\_ S.No. Date of order Order or other proceedings with signature of judge proceedings 3 1 2 The appeal of Mr. Naseer Hassan presented today by Mr. Noor 07/10/2019 1-Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR 2/10/19 This case is entrusted to S. Bench for preliminary hearing to be 2put up there on 26/11 13 CHAIRMAN

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

### APPEAL No. 1239 /2019

#### **NASEER HASSAN**

V/Ş

#### **EDUCATION DEPTT:**

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#### APPELLANT

THROUGH:

#### NOOR MOHAMMAD KHATTAK, Advocate

ROOM NO. 3, UPPER FLOOR, NEW ISLAMIA CLUB BUILDING, KHYBER BAZAR, PESHAWAR CITY 0345-9383141

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

<u>PESHAWAR</u>

## APPEAL NO. 1239 /2019

Khyber Pakhtukhwa Service Tribunal

Diary No. 1410

#### VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Swat.

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT GRANTING/ALLOWING PROMOTION TO THE APPELLANT TO THE POST OF SECONDARY SCHOOL TEACHER (BPS-16) FROM THE DATE WHEN THE PROMOTION QUOTA WAS FILLED BY THE RESPONDENTS THROUGH INITIAL RECRUITMENT OR FROM THE DATE OF COMMENCEMENT OF THE ACT NO.XVI OF 2009 COMMONLY KNOWN AS REGULARIZATION OF SERVICES ACT, 2009 NOTIFIED IN THE OFFICIAL GAZETTE ON 24.10.2009 WITH ALL BACK BENEFITS INCLUDING SENIORITY AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

#### **PRAYERS:**

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That on acceptance of this appeal the respondents may kindly be directed to consider the appellant for promotion to the post of Secondary school Teacher (BPS-16) from the date when the promotion quota have been filled by the respondents through initial recruitment or from the date of Commencement of the Act No.XVI of 2009 commonly known as Regularization of Services Act, 2009 Notified in recito-day the official gazette on 24.10.2009 with all back benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

# It It R/SHEWETH: ON FACTS:

## Brief facts giving rise to the present appeal are as under:-

1- That initially the appellant was appointed as PST in the respondents Department vide order dated 03.12.1990 and later on the appellant was promoted as PSHT (BPS-15) in the respondent Department vide order dated 26.02.2013 and subsequently promoted as Certified Teacher vide order 23.07.2015. Copy of the service book is attached as annexure

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- 3- That under protest the appellant and his colleagues applied for the said post through initial recruitment but the same was also refused to the appellant and colleagues of the appellant on the pretext that regular employees are not entitle to apply for the adhoc/contract posts of SST (BPS-16) thus appellant and his colleagues were deprived from prospects of promotion. That it is pertinent to mention that at the time of above mentioned advertisement the post/cadre of C.T (BPS-15) to which the appellant belong have no prospects of promotion.
- 4- That in light of the said advertisement new appointments were made by the respondents on adhoc basis and even the promotion quota was also filled by the respondents though initial recruitment.
- 5- That in the meanwhile the Provincial Government Promulgated the employees regularization Act, 2009 whereby all the adhoc employees who were appointed as SST on temporary basis were regularized thus further affected the cadre to which the appellant belongs. That the promotion quota for which the appellant and his colleagues have waited for decades has been washed by operation of the said Act of 2009. Copy of the Act is attached as annexure **C**.
- 6- That feeling aggrieved the appellant and his colleagues knocked the door of the Peshawar High Court through various writ petitions including writ petition No.2905/2009. That vide consolidated judgments dated 26.1.2015 the said writ petitions were disposed of with the directions that:

(i)- The act.XVI of 2009, commonly known as (Regularization of services) act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.

(ii)- Official respondents are directed to work out the backlog of the promotion quota as per above mentioned example, within thirty days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh recruit.

Copy of the Judgment is attached as annexure ...... D.

**7-** That the respondents assailed the said judgment of the august Peshawar High Court Peshawar in CPLAS No.127-P to 129-P/2015 but the same were dismissed as withdrawn vide judgment dated 20.9.2017. That then after the appellant and his colleagues time and again visited the respondents for their promotion to the next higher scale but the respondents instead of redressing the grievance of the appellant and his colleagues advertised the posts through initial recruitment through various advertisements. Copies of the judgment and advertisements are attached as annexure **E & F.** 

- 9- That feeling aggrieved the appellant and his colleagues knocked the door of august Peshawar high Court, Peshawar in various COC Petitions numbers including COC Petition No.105-P/2018 and the same has been disposed of vide judgment dated 8.11.2018 with directions to approached the august Service Tribunal for claiming of promotion and seniority. Copy of the judgment is attached as annexure .....

#### **GROUNDS:**

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- A- That the inaction of the respondents by not allowing/granting ante dated promotion to the appellant to the post of SST (BPS-16) is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the inaction of the respondents by not allowing/granting ante dated promotion to the appellant to the post of SST (BPS-16) is based on mala fide and arbitrary intentions and as such the same is violative of the principle of natural justice.
- D- That, the respondents acted in a malafide manner by not promoting the appellant to the post of SST (BPS-16) inspite of eligibility, seniority and fitness.

- E- That the respondents acted in arbitrary and malafide manner by not ante dated promotion to appellant to the post of SST (BPS-16) despite the fact that the appellant was not allowed in the initial recruitment process because of the fact that he is in regular promotion zone and will soon be promoted to the post of SST (BPS-16).
- F- That the inaction of the respondents by not allowing/granting promotion to the appellant to the post of SST (BPS-16) is violative of section-9 of the Civil Servant Act 1973 read with Rule-7 of the (Appointment, Promotion & Transfer) Rules 1989.
- G-That as per Rules and regulation the appellant is entitle for promotion to the post of SST (BPS-16) with all consequential benefits including seniority.
- H- That according to Article 38(e) of the Constitution of Pakistan, 1973 the state is bound to reduce disparity in the income and earnings of individual including persons in the services of Federation.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 1.8.2019

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APPELLANT NASEER HASSAN **THROUGH:** NOOR MOHAMMAD KHATTAK 8 MIR ZAMAN **ADVOCATES** 

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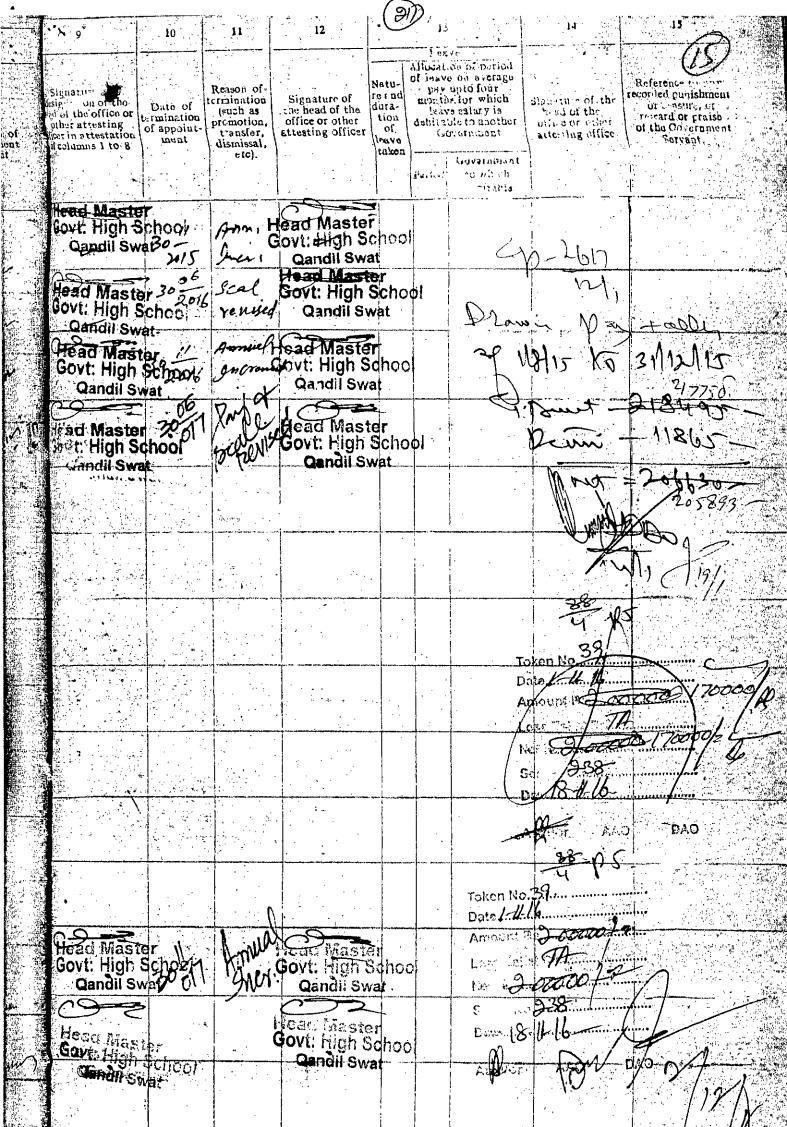
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- روی) تیکر کا Voil period دے دن سک دیا۔ (دی) ام مال مرب سے درو

### بادخوا نزكي تمتو يرمر حد S. S.

بنور دارم نواندگی بن تیناد دی سکرل نیچرد (SST مادر ۲۶۲ ) و میشارسه (SS - 17 (SS کی مالی آسانیوں به خامینا مادش مسر کمک اودا: بن میرف کی نباء بر تعین ان سیند 10 اکمست 10<sup>1</sup> ایچ ۱۵۶ بید و دی برتک مرف انترنیت و تغد به اک دیب ساعت onvw.onwip.com ، ورب مرف مو بسر عد ادر فانا س سکری باشدون ام مدوادن د ( ارا تین وطنوات ) ية بن لائن در خود سيس مطلوب تيرب .

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و كمرز إنه (1) الماس كمي الميد المراد الم المسامى عمد أتر من محسستر في دالم من (1 والرمن المن) الدر المنى (1 - والمد) عمر م الذم ووصفاعت مى إلى شده بوتالاذكى ب- (2) موجر مدادد فذاك مذاو مكى اور بكر ك ( جدال رك وال امد ال در الاعلى مدينة بالا مين . (3) كاماب امدادون كالقرول فدن داخر مدت استكى بداد براميدوار يركون سام/ديني ين المروى عمول مى الدى الألوا الال الارتدادك + المراكر ك عن (الاجلى على مود ال اميد الدوم الدو المروسة عن الدمين ال امدرار المان كان من المالي من المان المار المارك (4) اكم من الدار من MVMSC ك ذكرى رك وال اسد الدائك مد إدر 55 ما مين (متلقة مرن) ميك الك الك الد خارم من الراعية مي ما الى وال على مال آساس في مام ومتاليا كاسومت عميام ماب اميدواد ولكوم ب شكم محمل برجما فبما - كما جامل برعمر يتعبتاني جركه، تا على جادلداد ومشلقة ودن می مودن اسد داری مذم . : دونی ب مشروط مولی - (5) اندر می به دقت ده مدد با سودت سا نز مسدق تساوم ادر آم اسل هلی اسادا، بشردادات الانتمال : السال مر الكليت كمين فرائزا قومي المناتى كمدومت قسام وساري الت سكردد مدومسد قد نتر إله مي المركز ااول بول من مجمع المحل وارد اول مو برمد من مستقل الما وال با تعالمات الما ودواست وين مسال الما مي ال يول الدي الاول بول من مجمع المحل وارد اول مو برمد من مستقل الما وال با تعالمات الما قد دود فراست وين مسال الما مي ال استان می می باد. این می می توبان می تو بارسان استان بین می می این می باد. استان استان که توبان می توبان می توبان این این می مادند (میکامی مدور می موجد تعلق مورد) باد. این است های این این می از می این می

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می مادید. ۱۲ المیت از میرن کا همین برا بسین می میشد منابع است ۲۰ می نیمر ۲۵۵ (2) انتروع سکامی خبر شدید. ۱۴ المیت از میرن کا همین برا بسین می میشد میشوانعکن میکر به ۲۰ مکل نیمر ۲۰ ۲۵ 31

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ہم امرک دستا مست سم درک ہے کہ اس استباد سے تحت شمن شدا مدامد دارد دن کو بنیا دمی مراحات مشاہ کمی تمکن کی جنوبی وغیر و ما فرنین ایک در اجراع از بعن مجمد المراضع اولا کرد ( الم ما از می کر ) تا مروسات اور دسیان بر امار به ایک کر کی کی کر محک مراحب به در ما کن کر مشارک به او اور اعتراع امید اور می منه مات بالن کی کا مراحب از ۲۰۰۰ می ( www.onwife مدون کریں۔ آن این قارم برکرت وقت انتبال من قدر میں کی جعدی کا معلومات کا م قد مداد کورد فواست دیندون ما مرد وک سر کس کس کس کے لیے ذروار شیم موکا در شامید دامر کو تجنی تاریخ کسی کا مقل مال موجد مستاز دون میں قام ایل در دواست وابتد و کان کو انتروع بن شال کیا جائے کو جم کی کسیس 13 ایک سے 2005 مرکو ویب مالند و envelp.com بر شاق کس ما یک وند و میداد دسه المرما بادی بین شد ما تن . شدانها مرور مرد با مرکام ما به اورداد ان از از تر سد ایل بر اس ماری کرد مرتبلیس بین کرمان وی به کار الرس کرمانه و با دوم و هما کرمانه و کرما با در و کملیه اسد دارد از کان و اس ماری کرد مرتبلیس بین کرمان وی به کار الرس کرمانه و با دوم و هما کرمانه و کرمانه و مسله امد دارد از کان و دارد م دنتر على بور يعنى مرويد ودويد المي تاريخ ان مام بعدة موكا. 377-12 م دانه 313

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## THE <sup>3</sup>[KHYBER PÅKHTUNKHWA] EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009. (<sup>4</sup>[KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009)

[First published after having received the assent of the Governor of the <sup>5</sup>[Khyber Pakhtunkhwa] in the Gazette of <sup>6</sup>[Khyber Pakhtunkhwa] (Extraordinary), dated the  $24^{th}$  October, 2009]

## AN ACT

## to provide for the regularization of the services of certain employees appointed on adhoc<sup>6</sup> or contract basis.

WHEREAS it is expedient to provide for the regularization of the services of certain employees appointed on adhoc or contract basis, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:-

1. <u>Short title and commencement.</u>---(1) This Act may be called the <sup>7</sup>[Khyber Pakhtunkhwa] Employees (Regularization of Services) Act, 2009.

(2) It shall come into force at once.

- 2. <u>Definitions.</u>---(1) In this Act, unless the context otherwise requires,-
  - (a) "Commission" means the <sup>8</sup>[Khyber Pakhtunkhwa] Public Service Commission;
  - (aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment;

(b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge basis or who are paid out of contingencies;

<sup>3</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011 <sup>4</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011 <sup>5</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011 <sup>6</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011 <sup>7</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011 <sup>8</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

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- (c) "Government" means the Government of the <sup>9</sup>[Khyber Pakhtunkhwa];
- (d) "Government Department" means any department constituted under rule 3 of the <sup>10</sup>[Khyber Pakhtunkhwa] Government Rules of Business, 1985, and does not include any section of a Department or an organization which is federally funded;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants; and
- (f) "post" means a post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commission.

(2) The expressions "adhoc or contract appointment" and "civil servant" shall have the same meanings as respectively assigned to them in the <sup>11</sup>[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (<sup>12</sup>[Khyber Pakhtunkhwa] Act No. XVIII of 1973).

3. <u>Regularization of services of certain employees.</u>---All employees including recommendees of the High Court appointed on contract or adhoc basis and holding that post on 31<sup>st</sup> December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

4. <u>Determination of seniority.</u>---(1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

(2) The seniority interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

<sup>9</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
 <sup>10</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
 <sup>11</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
 <sup>12</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

4A. <u>Overriding effect</u>.---Notwithstanding any thing to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

5. <u>Repeal.</u>---The North-West Frontier Province Employees (Regularization of Services) Ordinance, 2009 (N.-W.F.P. Ordinance No. VII of 2009) is hereby repealed.

JUDGMENT SHEET PESHAWAR HIGH COURT, PESHAWA (JUDICIAL DEPARTMENT) Writ Petition No.2905 of 2009. ATTA ULLAH AND OTHERS. ...........PETITIONERS. VERSUS. THE CHIEF SECRETARY KPK ETC .... RESPONDENTS .. <u>JUDGMENT.</u> 26.01.2M.5 Date of hearing Appellant/Petitioner by Ghulam Nabi khan Adverate. andar Ali Raza Advocate & Wagar Ahmad Khan AAG **Respondent** WAQAR AHMAD SETH, J:- Through this single judgment we propose to dispose of the instant Writ Petition No.2905 OF 2009 as well as the connected Writ Petition Nos<sup>1</sup>.2941, 2967,2968,3016. 3025.3053,3189,3251,3292 of 2009, 496, 556, 664, 1256, 1662, 1685, 1696, 2176, 2230, 2501, 2696, 272'8 of 2010 & 206, 355,435 & 877 of 2011 as common question of law and fact is involved in all these petitions. 12 1 ATTESTED 078 MAR 2018

2- The petitioners in all the writ petitions have approached this Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 with the following relief:-

> "It is, therefore, prayed that on acceptance of the Amended Writ Petition the above noted Act No.XVI 2009 namely 'The North West Province Employees (Regularization of Services) Act, 2009 dated 24th October. 2009' being illegal unlawful, without authority and jurisdiction, based on malafide intentions | and beina unconstitutional as well as ultra vires to the basic rights as mentioned in the constitution be set-aside and the respondents be directed to fill up the above noted posts after going through the legal and lawful and the normal procedure as prescribed under the<sup>1</sup> prevailing laws instead of using the short cuts for obliging their own person.

> It is further prayed that the notification No.A-14/SET(M) dated 11.12.2009 and Notification No.A-17/SET(5) Contract-Apptt:2009 dated 11.12.2009, as well as Notification No.SO(G)ES/1/85/2009/SS(Contract) dated

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31.05.2010 issued as a result of above noted impugned Act whereby all the private respondents have been regularized may also be set-aside in the light of the above submissions, being illegal, unlawful, inconstitutional and against the fundamental rights of the petitioners.

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Any other relief deemed fit and proper in the circumstances and has not been particular asked for in the noted Writ Petition may also be very graciously granted to the petitioners".

3- It is averred in the petition that the petitioners are serving in the Education Department of KPK working posted as PST,CT,DM,PET,AT,TT, Qari and SET in different Schools; that respondents No.9 to 1359 were appointed on adhoc/contract basis on different times and lateron their service were regularised through the North West Frontier Province Employees (Regularization of Services) Act, 2009; that almost all the petitioners have got the required qualifications and also got at their credit the length of service; that as per notification No.SO(S)6-2/97 dated 03/06/1998 the qualification for appointment/promotion of the SET Teachers BPS-16 was prescribed that 75% SETs shall be selected through Departmental Selection Committee on the basis of batchwise/yearwise open merit from amongst the candidates having the prescribed qualification and remaining 25% recruitmeht through Public Service by initial Commission whereas through the same notification the qualification for the appointment/promotion of the Subject Specialist Teachers BPS-17 was prescribed that 50% shall be selected by promotion on the basis of seniority cum fitness amongst the SETs possessing the qualification prescribed for initial recruitment having five years service and remaining 50 by initial recruitment through the Public Service Commission and the above procedure was adopted by the Education Department till 22/09/2002 and the appointments on the above noted posts were made in the light of the above notification. It was further averred that the Ordinance No.XXVII of 2002 notified on 09/08/2002 was promulgated under the shadow of which some 1681 posts of different cadres were advertised by the Public Service Commission.

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That before the promulgation of Act No.XVI of 2009, it was practice of the Education Department that instead of promoting the eligible and competent persons amongst the teachers community, they have been advertising the above noted posts of SET (BPS-16) and Subject Specialist (BPS-17) on the basis of open merit/adhoc/contract wherein it was clearly mentioned that the said posts will be temporary and will continue only for a tenure of six months or till the appointment by the Public; Serviced Commission or Departmental Selection Committee That after passing the KPK Act No.XVI of 2009 by the Provincial Assembly the fresh appointees of six months and one year on the adhoc and contract basis including respondents no.9 to 1351 with a clear affidavit for not adopting any legal course to make their services regularized, have been made permanent and regular employees whereas the employees and teaching staff of the Education Department having at their credit a service of minimum 15 to maximum 30 years have been ignored. That as per contract Policy issued on 26/10/2002 the Education Department was not authorised/entitled to

make appointments in BPS-16 and above on the contract basis as the only appointing authority under the rules was Public Service Commission. That after the publication made by the Public Service Commission thousands of teachers eligible for the above said posts have already applied but they are still waiting for their calls and that through the above Act thousands of the adhoc teachers have been regularized which has been adversely effected the rights of the petitioners, thus having no efficacious and adequate remedy available to the petitioners, the have knocked the door of this Court through the aforesaid constitutional petitions.

4- The concerned official respondents have furnished parawise comments wherein they raised certain legal and factual objections including the question of maintainability of the writ petitions. It was further stated that Rule 3(2) of the N.W.F.P. Civil Servants (Appointment, Promotion & Transfer)Rules 1989, authorised a department to lay down method of appointment, qualification and other conditions applicable to post in consultation with Establishment & Administration Department and the Finance Department.

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That to improve/uplist the standard of education, the Government replaced/amended the old procedure i.e. 100% including SETs through Public Service Commission KPK for recruitment of SETs B-16 vide Notification No.SO(PE)4-5/SS-RC/Vol-III dated 18/01/2011 wherein 50% SSTs (SET) shall be selected by promotion on the basis of seniority cum fitness in the following manner:-

Forty percent from CT (Gen), "(i) CT(Agr), CT(Indust: Art) with at least 5 years service as such and having the qualification mentioned in column 3. . (ii) Four percent from amongst the DM with at least 5 years service as such and having qualification in column 3. (iii) Four percent from amongst the PET with at least 5 years service as such and having qualification mentioned in column 3. (iv) One percent amongst Instructional Material Specialists with at least 5 years



service and having qualification mentioned

in column 3."

It is further stated in the comments that due to the degradation/fall of quality education the Government abandoned the previous recruitment policy of promotion/appointment/recruitment and in order to improve the standard of teaching cadre in Elementary & Secondary Education Department of KPK, vide Notification dated 09/04/2004 wherein at serial No. 1.5 in column 5 the appointment of SS prescribed as by the initial recruitment and that the (North West Frontier Provincial) Khyber Pakhtunkhwa Employees(Regularization of Services)Act, 2009 (ACT No XVI of 2009 dated 24th October, 2009 is legal, lawful and in accordance with the Constitution of Pakistan which was issued by the competent authority and jurisdiction, therefore, all the writ petitions are liable to be dismissed.

5- We have heard the learned counsel for the parties and have gone through the record as well as the law on the subject.

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6- The grievance of the petitioners is two fold in respect of Khyber Pakhtunkhwa, Employees (Regularization of Services) Act, 2009 firstly, they are alleging that regular post in different cadres were advertised through Public Service Commission in which petitioners were competing with high profile carrier but due to promulgation of Act ibid, they could not made through it as no further proceedings were conducted against the advertised post and secondly, they are agitating the legitimate expectancy regarding their promotion, which has been blocked due to the in block induction / regularization in a huge number, courtesy Act, No. XVI of 2009.

7- As for as, the first contention of advertisement and in block regularization of employees is concerned in this respect it is an admitted fact that the Government has the right and prerogative to withdraw some posts, already advertised, at any stage from Public Service Commission and secondly no one knows that who could be selected in open merit case, however, the right of competition is reserved. In the instant case KPK, employees

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(Regularization of Services) Act, 2009, was promulgated, which in-fact was not the first in the line rather N.W.F.P (now Khyber Pakhtunkhwa) Civil Servants (Regularization of Services) Act, 1988, NWFP, (now Khyber Pakhtunkhwa) (Regulation of Services) Act, 1989 & NWFP (now Khyber Pakhtunkhwa) Adhoc Civil Servants (Regularization of Services) Act, 1987 were also promulgated and were never challenged by anyone.

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8- In order to comment upon the Act, ibid, it is important to go through the relevant provision which reads as under:-

S.2 Definitions. (1)---

a)----

aa) "contract appointment" means appointment of a duly qualified person, made otherwise than in accordance with the prescribed method of recruitment. b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shirt/night shift but does not include the employees for project post or appointed on work charge

basis or who are paid out of contingencies; ----- whereas,

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S. 3 reads:-

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Regularization of services of <u>certain</u> <u>employees.</u>----All employees including recommendee of the High Court appointed on contract or adhoc basis and holding that post on 31<sup>st</sup> December. 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post;

9- The plain reading of above sections of the Act, ibid, would show that the Provincial Government, has regularized the "duly qualified persons", who were appointed on contract basis under the Contract Policy, and the said Contract Policy was never ever challenged by any one and the same remained in practice till the commencement of the said Act. Petitioners in their writ petitions have not quoted any single incident / precedent showing that the regularized employees under the said Act, were not qualified for the post against

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which they are regularized, nor had placed on record any documents showing that at the time of their appointment on contract they had made any objection. Even otherwise, the superior courts have time and again reinstated employees appointments were declared irregular by whose the Government Authorites. because authorities being responsible for making irregular appointments on purely temporary and contract basis, could not subsequently turned round and terminate services because of no lack of qualification but on manner of selection and the benefit of the lapses committed on part of authorities could not be given to the employees. In the instant case, as well, at the time of appointment no one objected to, rather the authorities committed lapses, while appointing the private respondent's and others, hence at this belated stage in view of number of judgments, Act, No. XVI of 2009 was promulgated. Interestingly this Act, is not applicable to the education department only, rather all the employees of the Provincial Government, recruited on contract basis till 31<sup>st</sup> December 2008 or till the commencement of this Act have been

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regularized and those employees of to other departments who have been regularized are not party to this writ petition.

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10- All the employees have been regularized under the Act, ibid are duly qualified, eligible and competent for the post against which they were appointed on contract basis and this practice remained in operation for years. Majority of those employees getting the benefit of Act, ibid may have become overage, by now for the purpose of recruitment against the fresh post.

11- The law has defined such type of legislation as "beneficial and remedial". A beneficial legislation is a statue which purports to confer a benefit on individuals or a class of persons. The nature of such benefit is to be extended relief to said persons of onerous obligations under contracts. A law enacted for the purpose of correcting a defect in a prior law, or in order to provide a remedy where non previously existed. According to the definition of Corpus Juris Secundum, a remedial statute is designed to correct an existence law, redress an existence grievance, or introduced regularization conductive to the public goods. The challenged Act, 2009, seems to be a curative statue as for years the then Provincial Governments, appointed employees on contract basis but admittedly all those contract appointments were made after proper advertisement and on the recommendations of Departmental Selection Committees.

12- In order to appreciate the arguments regarding beneficial legislation it is important to understand the scope and meaning of beneficial, remedial and curative legislation. Previously these words have been explained by <u>N.S Bindra</u> <u>in interpretation of statute, tenth edition</u> in the following manners:-

> "A statue which purports to confer a benefit on individuals or a class of persons, by reliving them of onerous obligations under contracts entered into by them or which tend to protect persons against oppressive act from individuals with whom they stand in certain relations, is called a beneficial legislations....In interpreting such a statue, the principle established is that there is no room for taking a narrow view but that the court is entitled to be generous towards the persons on who'm the benefit has

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been conferred. It is the duty of the court to interpret a provision, especially a beneficial provision, Liberally so as to give it a wider meaning rather than a restrictive meaning which would negate the very object of the rule. It is a well settled canon of construction that in constructing the provision of beneficent enactments, the court should adopt that construction which advances, fulfils, and furthers the object of the Act, rather than the one which would defeat the same and render the protection illusory..... Beneficial provisions call for liberal and broad interpretation so that the real purpose, underlying such enactments, is achieved and full effect is given to the principles underlying such legislation."

Remedial or curative statues on the other hand have

been explained as:-

"A remedial statute is one which remedies defect in the pre existing law, statutory or otherwise. Their purpose is to keep pace with the views of society. They serve to keep our system of jurisprudence up to date and in

harmony with new ideas or conceptions of what constitute just and proper human conduct. Their legitimate purpose is to advance human rights and relationships. Unless they do this, they are not entitled to be known as remedial legislation nor to be liberally construed. Manifestly a construction that promotes improvements in the administration of justice and the eradication of defect in the system of jurisprudence should be favoured over one that perpetuates a wrong".

Justice Antonin Scalia of the U.S. Supreme Court in his book on Interpretation of Statute states that:

> "Remedial statutes are those which are made to supply such defects, and abridge such superfluities, in the common law, as arise from either the general imperfection of all human law, from change of time and circumstances, from the mistakes and unadvised determinations of unlearned (or even learned) judges, or from any other cause whatsoever."

13- The legal proposition that emerges is that generally beneficial legislation is to be given liberal interpretation, the beneficial legislation must carry curative or remedial content.

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Such legislation must therefore, either clarify an ambiguity or an omission in the existence and must therefore, the explanatory or clarificatory in nature. Since the petitioners does not have the vested rights to be appointed to any particular post, even advertised one and private respondents who have being regularized are having the requisite qualification for the post against which the were appointed, vide challenged Act, 2009, which is not effecting the vested right of anyone, hence, the same is deemed to be a beneficial, remedial and curative legislation of the Parliament.

14- This court in its earlier judgment dated 26<sup>th</sup> November 2009 in WP No. 2905 of 2009, wherein the same Khyber Pakhtunkhwa (Regularization of Servers ) Act, 2009, vires were challenged has held that this court has got no jurisdiction to entertain the writ petition in view of Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, as an Act, Rule or Notification effecting the terms and conditions of service, would not be an exception to that, if seen in the light of the spirit of the ratio rendered in the case of

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I.A.Sherwani & others Versus Government of Pakistan, reported in 1991 SCMR 1041. Even otherwise, under Rule 3 (2)of the Khyber Pakhtunkhwa (Civil Servants) (appointment), promotion and transfer) Rules 1989, authorize department to lay down method of appointment, а qualification and other conditions applicable to the post in consultation with Establishment & Administrative Department and the Finance Department. In the instant case the duly elected Provincial Assembly has passed the Bill/Act, which was presented through proper channel i.e Law and Establishment Department, which cannot be quashed or declared illegal at this stage.

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15- Now coming to the second aspect of the case, that petitioners legitimate expectancy in the shape of promotion has suffered due to the promulgation of Act, ibid, in this respect, it is a long standing principle that promotion is not a vested right but it is also an established principle that when ever any law, rules or instructions regarding promotion are violated then it become vested right. No doubt petitioners in the first instance cannot claim promotion as a vested right but those who fall within the promotion zone do have the right to be considered for promotion.

Since the Act, XVI of 2009 has been declared a 16beneficial and remedial Act, for the purpose of all those employees who were appointed on contract and may have become overage and the promulgation of the Act, was necessary to given them the protection therefore, the other side of the picture could not be brushed a side simply. It is the vested right of in service employees to be considered for promotion at their own turn. Where a valid and proper rules for promotion have been framed which are not given effect, such omission on the part of Government agency amounts to failure to perform a duty by law and in such cases, High Court always has the jurisdiction to interfere. In service employees / civil servants could not claim promotion to a higher position as a matter of legal right, at the same time, it had to be kept in mind that all public powers were in the nature of a sacred trust and its functionary are required to exercise same in a fair, reasonable and transparent manner strictly in accordance with law. Any transgression from such

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principles was liable to be restrained by the superior courts in their jurisdiction under Article 199 of the Constitution. One could not overlook that even in the absence of strict legal right there was always legitimate expectancy on the part of a senior, competent and honest carrier civil servant to be promoted to a higher position or to be considered for promotion and which could only be denied for good, proper and valid reasons.

17- Indeed the petitioners can not claim their initial appointments on a higher post but they have every right to be considered for promotion in accordance with the promotion rules, in field. It is the object of the establishment of the courts and the continue existence of courts of law is to dispense and foster justice and to right the wrong ones. Purpose can never be completely achieved unless the in justice done was undone and unless the courts stepped in and refused to perpetuate what was patently unjust, unfair and unlawful. Moreover, it is the duly of public authorities as appointment is a trust in the hands of public authorities and it is their legal and moral duty to discharge their functions as

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trustee with complete transparency as per requirement of law, so that no person who is eligible and entitle to hold such post is excluded from the purpose of selection and is not deprived of his any right.

18-¦ Considering the above settled principles we are of the firm opinion that Act, XVI of 2009 is although beneficial and remedial legislation but its enactment has effected the in service employees who we're in the promotion zone, therefore, we are convinced that to the extent of in service employees / petitioners, who fall within the promotion zone have suffered, and in order to rectify the inadvertent mistake of the respondents/Department, it is recommended that the promotion rules in field be implemented and those employees in a particular cadre to which certain quota for promotion is reserved for in service employees, the same be filled in on promotion basis. In order to remove the ambiguity and confusion in this respect an example is quoted, " If in any cadre as per existence rules, appointment is to be made on 50/50 % basis i.e 50 % ihitial recruitment and 50 % promotion quota then all the employees have been

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regularized under the Act in question be calculated in that cadre and equal number i.e remaining 50 % are to promoted from amongst the eligible in service employees, other wise, eligible for promotion on the basis of sonority cum fitness." 19- In view of the above, this writ petition is disposed of in the following terms:-

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(i) "The Act, XVI of 2009, commonly known as (Regularization Of Services) Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.

(ii) Official respondents are directed to workout backlog the of the promotion quotà as per above mentioned example, within 30 days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh

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Order accordingly.

recruitments.

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Announced. 26<sup>th</sup> January 2015

# IN THE SUPREME COURT OF PAKISTAN

PRESENT MR. JUSTICE EJAZ AFZAL KHAN. MR. JUSTICE SH. AZMAT SAEED. MR. JUSTICE IJAZ UL AHSAN.

CIVIL PETITIONS NO. 127-P TO 129-P OF 2015. (Against The Judgment dated 26.1.20,15 of The Peshawar High Court, Peshawar passed in With Petition No.2905 of 2009, 3 = 15 of 2009, 664 of 2019

The Chief Secretary, Govt. of KPK., Peshawar and others. ...Petitioner(s) (in all cases)

Attauliah and others. Nasruminuliah and others. Mukhtar Ahmad and others.

...Respondent(s)

For the petitioner(s): Mr. Mujahid Ali Khan, Addl. A.G. KPK

For the respondent(s):

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The second

Mr. Ghulam Nabi Khan, ASC Mr. Abdul Qayyum Sarwar, AOR

Date of Hearing:

20.09.2017 <u>O R D E R</u>

Elaz Afzal Khan, J.- The learned Additional Advocate General appearing on behalf of the Govt. of KPK stated at the bar that as per instructions of the Government he does not press these petitions. Dismissed as such.

> Sd/-Ejaz Afzal Khan,J Sd/-Sh.Azmat Saeed,J Sd/-Ijaz ul Ahsan,J Certified to be True Copy

Court Associate Supreme Court of Pakistan Islamabad

GR No: **Civil/Criminal** Date of Presentation No of Works No of Feb. 6 Requisition 5 Copy Fee in: Court Fee S Date of Co-Date of delive Jopy: . Compared by Prepared by: Peceived by:

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مى ئى اينۇ سىكندرى لاتتوكىش	من و بین کا بین کا بین اکثر ایک می می می می می می ایک می ایک مربع اکنرز ریگولینری ایک 2011 و کے سیکٹن نبسر 4 کے تحت تحک ایک مربع	مین اور زنستر آف نیچ رز بینجر رز ، انستر کن زاور و	مىيىر بىختونخوالايائىتىت ، ۋېيومىشى، بور	E-
2016 🔏 3	فوا مح متعلقة امنارع م سكون الل اميد دارون م محود و قارم ي 30	درجد ذیل آسامیاں پُر کرنے کے لیے فیسر پختون	زیرانظام (مردان <sup>ا</sup> زمانه) سکولوں میں	بحفو نخواط
ل پرغور نیس کیاجائے ہ. عر	ستیابید ب مقررد تاریخ ، گزر نے کے بعد موسول :و نے دالی درخواستو	دید سائن (http://www.nts.pk) تابلیت	تام آسامی	بمبر شار
ل-35r21	پلر و کمری جس کے ساتھ دری ڈویل دوسف ایٹن او زمی ہوں۔ پاری کیش باای کیش میں بیجلر و کری۔	سمی بیخی تشلیم فید دیو نور شب سے سیند واؤ میں تابع (۱) سمیسٹری، بیالو بی ( زدالو بی یا بائن ) (۱۱) ۔ سمسی بحق تشلیم خد دیو ندر نما سے ایم اے	سیّندرن سکول نیچر (SST) بیانوبی/کیسنری BPS, 16	1
しい35521	ییلرد کری جس کے ساتھد درج ذیلی دوستمانین بازی ہوں۔ چھس B یا۔ (iii)۔ قرئرس ، المیکس		سیمندری سکول نیچر (SST) فز <i>بک اینتق</i> س BPS. 16	1 · · · ·
JU35T21	چلوڈ گری جس کے ساتھ درج ذیل دومضاعین لازمی ہوں ۔ انگروپ ۔		BPS. 16	3
l	بے یکل 200 نمبرات کی تقسیم ای طرح ہے کی جائیتی ۔ پر			
<b></b>	+) یتلیی تابلیت = 100 نیم جس کی مزید تشیم اس طرح بوگ کل نیم		( ۱) یسکریڈنک نمین۔ لعلیمی قابلے	

اب) 50 بير - 50 بر - 50 مريد يمال فرج بون	7.100 111021010101
فى نبر	تعلیمی قابلیت
جامل کرد دنمبر 20x تقسیم کل نیر	المين الميس کې ا
جاص کرد و نبر 20x تقسیم کل نمبر	الفائ / الف ايس
ماصل کرد و نمبر 20x تقتیم کل نمبر	لیاہے / بیالی ک
ماعل كرد دنمبر 15x تقتيم كل نير	الحالي / المجالين
ما صل کر دونمبر x15 تقتیم کل نبر	لي الم / المجار المجالين
حاصل کرد د فمبر 05x تقتیم کل نبر	المجالي / الج المساليونيين
حاصل کرد دنبر ×05 تتنیم کک نبر	ايم تل / پارچوى

ندائی چارماندگون کی مودت می نبر دن کانتیم اس طرح ، دلی معاص کرده نیز 35% تقسیم کی نیز جنبه پیشده اندام استایج کیش کی صورت می نیز کی تقسیم اطرافته و بل بوگ ۱۰ کم استا بج کیشن هامل کرد دنبر 20% تقسیم کی نبر

فوت: (1) بر سکول کا آسا ک کے لئے ملحدہ میر شامست مرتب کی جا یکی جس میں امید داروں کے NTS کے ماصل کرد ونہرا ادرائلی قابلیت کے نبروں کو مخ کیا جائیگا۔ (2) براسیردار سے NTS فی در نواست فارم 300 دوب چارن کیا جائے گا۔ اگرایک امید دار5 سکولوں کے لئے در تواست دیکاتو آئن سے 800 دوبانلی NTS چارت کرینگے۔ جرک امید دارخود برداشت کریں گے۔ (3) ۔ NTS شت می 40 لیسد نبر لینا ضرور کی سنی - 40 لیسر سے دانا امید دادنا الم تصور ہوگا اور میران است میں شان میں ہوگا۔

عصرة حلى منشو احتط :- (1) تما متم ريال مكومت نيبر پختونوا يم دوتوانين مح مطابق بنياد كانتر دك المعام Appoinment و25 يعد

حصد رقبق خثك اذائريكتر ايليمنتري اينذ سيكنذري ايجوكيشن خيبر بختونخوا بشاور

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سیر و مو الاالانت ، ڈیوین ، پر منت اور ژامشر آف تیر ( ، اسٹر لٹرز اور ڈائٹرز ریلدینر کا ایل 2011 مے سن مبر 4 نے تاحیا سیستد دن ایل 2017 میں میں 4 میں میں 2013 میں میں 4 میں میں میں 4 میں دوجہ دیں میں 4 میں میں 4 میں 4 میں میں 4 میں م میں 4 میں

ودخواستول يرخود بس كياجا يكا-

1	والميت	······································		ن ب آ ب ای	je,
لاتا 355 19	ذیل دومضاین لازمی موں _ (i) میسٹری، بیالوتی (زوالوتی یاباتی)	نڈ دوم ی بیلر ڈ کر کی جس کے ساتھ درج	سمى بحى شليم شدويج ندرش ي ي	سکول میچر (SST) بیالو تی/ (i)	ا سَيَندُدِيَ
	- Sn J. Mac RITI	ii) BPS-16- بستری			
JU35219 (i	ج ذیل دومشاین لازی موں - (i) فر م میتمس A یا (ii) فر می میتمس B یا (iii)				2 سیکنڈری
			س،آنیکس		<u> </u>
· · · · · · · ·	RITI	الازى فرينك مكومتى ادارون E/PITE	)) سلیکشن ادرتقرری کے بعد 9 ماد ک	ii)	
لا 35 ت 19	ذیل دومضاین لازی بون(i) انگریزی لازی موسینیو کروپ یا دیگر مساوی کروپ				3 سیکنڈرک
	RITI	بالازى فرينىك مكومتى اداروں E/PITE	)) سلیشن اورتغر ر <b>ی</b> سے بعد 9 ما <b>و ک</b>	li) BPS-16	
	سے کی جائیگی ۔	200 نمبراتٍ کې تقسيم اس طرح	ریٹیریا درج ذیل ہے ۔کل (	اساتذہ کے سلیکشن کیلئے ک	کشن کریلیریا:
وتتسيم كل نمريجك م	لی ایس جادمالدکوری کی صورت یس فبروں کی تشیم اس طرح ہوگی ۔ ماسل کردہ فبر x0x		)تعلیمی قابلیت =100 نمبر	رىيە NTS-100 تمبر (ب	) سمرینگ نمیٹ بذ
	وراندا يم اسما يجريش كامورت ش تمرك تقديم بطريقة ذيل موكى-	11. 7		······································	<del> </del>
•			كتلى قابليت	کل قبر	تعليم قابليت
,	ايم الما يج يمن مامل كرده نبر x01 متيم كل نبر (5 نبر بي اف +5 ايم اف)	مال کرونس 20 <sup>(تش</sup> یمال م	الأسار/الإساليماي	مامل كرده نمبر x 20 تقيم كل نمبر	اليماليمى
	الله المار) برسکول کی آ مامی کیلے طبحہ وطبحہ ومیرٹ لسٹ مرتب کی جا تکی جس میں امب	مامل كرد ونبر 20x تعيم كالجر	الجمام / الجمالي ي	مامل كرد انجبر 20x تقيم كل نمر	ا/بی ایس ی
يعد فمير ليراخرورك	کرواس کرداند او بخیری قابلیت کردن کوی کیا جائیکا-(NTS(2 میرو می 40 ف	مامل کرده نمبر 05x تشیم کل نمبر	ام الأرام الم الما يج كمش	مامل كرده فمر x 05 تشيم كل فمر	بي آلي
	-40 فعلا - م تم الغريد والا الميذة المالى تعود موكادوم ر فالت عن شال عن موكا-			مامل كرده نمبر 10x تتسيم كل نبر	الله المكاني
ورايد الم	(Inicial Appoi) کر کے جب خالعتا مارش بنادوں برالماک / سنز	ایس 25 نیمد بنیادی تغرری (nment	ر پختونوا کے مروجہ قوانین کے معا	ا :- (1) تمام تقرریان حکومت خیر	ومین شرائط

ممد رفیق شٹک ،ڈائریکٹر ایلیم نٹری اینڈ سیکنڈری ایجوکیشن خیبر پشتمنخوا پشا

INF(P) 6749

ل متونو الايمنت أو ويعين الاستق اور والمنو تجرد المكتر كترز الارد التوزر كما ليفرى الكن 102 - محيكش فير 4 تحت محف الميمتر في الحد تستندرى الجوكيش فيرد الم الم المردان از مدر الدارية ) سكولون من درجه ویل آسامیان پر کرف کیلیا خیبر بختونوا که متعلقة احتلاع می ماید مساف من من ماید سامان مید مسلون من ورجه وی میرون مسافر الم المرد المردان المرد المردان المردان المردان می محدود قدار مردان المردان می محدود قدار مردان المردان مسافر محمد می محدود تواسیس ب جیس در خواست قارم (NTS) کی دیب سائن (/http://www.nts.org.pk) پردستیاب ب مقرود تا ماین کزرت کے جدم مول ہونے دول در خواستون پر فور نیس

والشوال يرفورة	مان	- <u>E</u>
<u>,</u>	المنابعة الم	उंधांगर औ
:21	ەينورىنى ئەيىپىند ۋەيرىن يېچرد كرى يىس كەماتىدىدىنى فىل دومىغىايىن لازىي بىول .	سَيْدُرْ بَسُولْ فِحْدِ SST بِيَادِ بْنَ الْمَنْ مَحْدَةِ بْعَدَة
35 بال	(زوالوتى يابائق)	ا) مسرق BPS، 16 [] ) مسرق ما يوند
•	وكالتورخ مستائم المساليم كيشن بالجوكيش بمل يجلر ذكرى	الالاس محمد المرجع المعالم الم
:21	اي نورني بي سيند ذويرن خلر و كرني جس ب ساتد درن ذيل دومغدايين لا زي جوں .	یکنذری سول نجر SST () کی می شلیم شده
35 يال	يا(ية)فرنس يسمس Bإ(ية)فرنس أصطل	A س BPS.16 من BPS.16 من يعمس A
<u>.</u>	الانتدائى بياسا الجركيش والمجانيش عما يتلزد أرى	2) کام محمد منابع مدد
:21	ې نورنې يه سيند وه يژن پېرو کړي جس که ماند درن د بل د دمغا تين لا زمي دول -	سَيندري سَوَلُ نَحْجَهِ SST ) کسی محق شلیم شد ،
35 سال	لیکٹر کروپ یا دیگر مسادی کردیہ (2)سی بھی شلیم شدہ یو بندرجی ہے ایم اے ایج کیشن ا	بترك BPS.16 (i) المريزي لازمي بو
Ç		المجتن بكه جكرا ا
	دانت کی مسیم از ماطرت کی جائے گی۔	ن تریخ با ۱۱ ما مدوت سلیش کرین بادر ن ذیل میں مکل 200 نم
	ظبلیت = 100 نمبر جس کی مریح تقسیم ان طرن ہوگ <sub>۔</sub>	سکرینتک نمیٹ بذریعہ NTS=100 نمبر (ب) تعلیمی
		لعلي کا يليت
	مامل کرد دلیم 20 متسم کی غیر	وليسالين في
	مامل کرد د نیس 20x مسیم ق کمبر	التسبا سالانيك اليمرى
^ -	مامل کرد دنبر 20x متسیری نمبر	فاسمانها يحري
	مامل کرد ونبر XSX متسیق نبر	الجمام الم الم الم الم الم
	مامل کرد <i>نب</i> ر 15x متسیک نمبر	ن ای <i>د والیم د</i> یه ایج کیشن
	مامل کردونمبر ۲۶۶ متریم کا نبر	اليم إلى في الميني المساعة علي تستن
	2 South ARIAN STA	الم محل الي الكاذي
1	د ونهر 35x شتیم کل نبر جبکه چنادر ندایم اے الجو کیشن کی صورت میں نمبر کی شتیم اطریقہ ذیل ہوگہ	، جا رِسالہ کورش کی صورت شریع میں کی شبیم اس طرت دیوگی جامل تر
		لا محبة الأن الأوروبير ZUX - مرض مجر
. 12 6	جس میں امید داروں کے NTS کے حاصل کر دونمبر اورتعلی قابلیت کے نبیروں کو جن کیا جا۔ س	المسجر مكول فما إساق كيلة ملحد وهيعد وميرت كست مرتب كم جانتكي
to to the second	ایک امیدوار پالی سکوان کے لئے ورخواست و مسکا توام سک چیف کے جوان کو ک کیا جا۔ ایک امیدوار پالی سکوان کے لئے ورخواست و مسکا توام سے مرف 800 روپ جن NTS	· که ۱۹۴۵ در در سرت ور ۲۰۵۵ رو سیا مارج که از ا
•		پېروسو د پر د دست سر يې کې کې د د
بذالعة تجردمتي	روبر قوانین کے مطابق میں دنی آخر رق Initial Appoinment کے 25 نیسد کوئے ترجی سامہ مذہب میں ا	ایک شواخط ۱۰) تمام تقرریاں مکیمت نیس پختونو اے م
~	والإعلامي إمراهيا ورياريه فالراح فالمتحل وتستعلم ومعريم بالمراح فستكلف	
	والمراجع والمرتبع المرتب والمناج والمتحاصة المتحد المتحد المراجع والمراجع والمراجع والمراجع والمراجع والمراجع	<sup>یہ س</sup> میڈ اند و بروز مرت کریا ہوتی ہے۔ 4 )اختر دیکو مسلنے دیے دوا <u>لے ا</u> ع
<b>1</b> 2 .	دوللت تلويا ويروقه ولولد ولومنت فركرون بالمسترج كالأرو والمتعود ستريد وكابر البعستريان	یا لیکا - 100 م ایروس کا اعسار جان کی ہے اندو وکون دور کا کے بھی تجاری کا
- A - A	مرادق في العلمية السلمكر الأرامة مكذرة والمصليق والتراب الملك مدلجات الترادية المراجب والمراجب والمرا	ید <sup>و ر</sup> یسها میر می کا کا <sup>و</sup> <sup></sup> ن <sup>-</sup> ن <sup>-</sup> ب سے مطابق کی ارت کی یا بن
0.0	م وجوز وفي بيد كالمسجر ويؤتون أوسترم المركز من المدير تم المعد برمين تعطيهم المارين ما م الا	محربها الربيسة فلابا الحمام تعمر رباب موقست فينتز وشواكو ذيبية معتدركره ولواء
S. 18 1	المجافزان بالمحافظ والمعاد وخرفونا المركب والمترتب المحالية والمحالية والمحالية والمحالية والمحالية والمحالية	الاسان کا طالب الان ای از ۲۰۱۱ ۲۰ ۲۰ ۲۰ ۲۰ مراض اصبید وار طی استاد میسی با <u>ن</u> کے
1. 25 .	ورطوقوا بحو وملمور فيفعد لأخدار بجالا مسترس فتركي فيادفون حتكه للسبر كالمار مركي يعدون بادار	م مسلم ۲۰۵۰ ، ۲۰۰ <i>ن فرز ۲۰</i> ۰ سورات وی صورت تک در خوار ۲۰۰ ق
- tola	ملقم وملا يعتطف المغلار فيديجمة وعبدانكي فجرفهاد مرجوا الجريز 18 كاور روكدت سكرا العس المركز	بورن می جانب ۲۰۰ (با شرود و سن چیف سنگه جا منطق 14 ) تراه
1	الاسلين وجوارية والمساكرة الوالد المركز كالرباب والمسكر المرتعيان كالدار	المستعمان والمالية المسائع معداد وببغت وشت فالمستونون بالترابي وساذرو سراعهم
N	بالمبيدار وحاصل كتبها بلكهات يثبران بات كاخبالي ركماجا بيتركاك وببريه برمكادن مسادس	ن کیک سفول شریق جانے کی آئی مورت بل سفول سیستن کا استحقاق
	ر به کار NTS کرد. روز در موجود مر ۱۹۶ ایت داد و کرد و ترکی کرد. رو کار NTS کرد. روز در موجود مر ۱۹۶ ایتان دور و کرد و ترکی در ا	<u>ا المبدوار کوشنیشن کا موقع طی سکے ۲</u> (17) درخوانہ - دینے کا طر

- «اب أمير واركوسليكش كاموقع مل ستم - 17) در خواست وي كام يته كار NTS ك ويب سائت برموجود ب-18) متعلقة اعتلاساً ك عالى أساميون كي تتعييل سكول والز INF(P)4383

مت فارم ب سائد NTS ب ويب سائن بودن في جادد مرسكول كوابة كوذوبا كما ب

HOA SST

ی بر پختونخواا پواکمشن مو بیشن می سیست اور شرانسفر آف نیچرز کیچروز <sup>۱۱</sup> سرکشرزاور ڈاکٹرز ریگولیٹری ایک 2011ء کی سیکشن نمبر 4 کے تحت محکمہ ایلیمتر می اینڈ سیکنڈری ایکوکشن خیبر پختونخوا کے انتظام ( مردانہ/ زمانہ ) سکولوں میں درنیہ ذیل آسامیاں پر کرنے کیلیے خیبر پختونخوا کے متعلقہ اعلمان کی کی کوئی ایل امیدواروں ہے محوزہ فارم پر 5 جنوری 2014ء تک درخواستیں مطلوب ہیں خواست فارم NTS کے دیب سائٹ (/http://www.nts.org.ph) یہ ستیاب ہے مقررہ تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں کی جائزگیا۔

, E	تابلت		· · · ·
		نا آآسای	تمبيرتهر
351 21	سمنی بنی بسلیم شد ، یو نیورش سکنۀ ڈ ویژن بیچلر ب <sup>ع</sup> کری جسکے ساتھ درج ذیل دومضامین لازمی ہوں	سیکنڈری سکول میچ <u>ر (</u> SST)	1
بال	(i) کیسٹرئ بپالوجی(ذوالوجی پاہانی) (2) کسی بھی <sup>ش</sup> ام میں شد دی <sub>ن</sub> زورش سے ایم اے ایجو کیشن میں بیچلرڈ گری	بيالو بي/ <sup>2</sup> يمسٹري65-BPS	
35¢21	میں مجمع جندہ پر جند ہوتا ہے جاتا ہوجات جکر کرن شکے ساتھ درج دومتسامین لازی ہوں	سینڈری کا ای کچر (SST)	2
سنال	(1) فر من مستقسم A یا (11) نو کس کلیا (11) فو می استعناس (22) می جمانساییم شده یوند با ساله ایم استاییم کمشن یا یوکیشن می تیلرد گری	قزىر/ يحس 16 BPS	
35121	م سمی تحقیق شکیم شده او نیورش <u>سیم بیکی او نیورش سیم بیک</u> ر د کردی چینی ساتصد درج ذیل دومضرا مین لا زمی ہوں	سیکنڈری سکول میکر ( SST)	3
_ بال	(i) انگریز کالازی ، وسیطیز گردوب یا دیگر سادی کروپ (2) کسی بیمی شده یو نیدر تک سے ایم اسے ایم اسے ایم کیشن یا بیج کیشن میں پیچلرد گری	BPS-16برل	

اساتذہ یے سکیش کیلی کریڈیل میں کر 200 نمبرات کی تشیم اس طرح ہے کی جا بیگ (ارسکر فیک میٹ بذراید NTS = 100 نمبر ۔ ب تعلیمی قابلیت = 100 نمبر

کل ننبر	تغنيمي فابليت	کل دُود.	تعليمى فابليت
حاصل کردہ نمبر ×15 تقلیم کل نمبر	بنا ايد/إيم ا_ايجو يشن	جامل کردہ نمبر کا چاہتے ہیں <sup>م</sup> نبر	الير اليويكي
حاصل کردہ نمبر x05 تقسیم کل نمبر	الميم المراجم المجالية الجوكيش	جاص كرده نبير برياني في مجل نمبر	ایف این ایس کی
حاصل کردہ نمبر x05 تقشیم کل نمبر	25- ひら乞い、ノノドーに	ماصل كروه تردان بالمسم كالجر	لى ايرا يورا يس بى
	خاصل کرد، بیر، (15 تقسیم کل نبر		ايم السرايين على

۵۰:۱- برسکول ۲۰ بهای کیلفظیرہ میرمداست مرتب کیاجا بڑا جس بی امیدواردن کے NTS کے حاصل کردہ نمبرادرتعلی تابلیت کے نمبرول کوجع کیا جائے گا۔ - براطبی دارے، NYS فرانشواست فارم 300 روپ چارج کر بطاریف کرا سیددارخود برداشت کرینگے۔

ای شراک (۲) تنام تقرریان کورند خیر پختوا کر مرد قوانین کر میابی نیادی اقترری Aga Relavation کے 25 فیمد کونے کر تحت خالسا عارض بنا دون پر Adhoo اور عرک پر تیک سال کیلیے دیگی (۲) ان اسد دارون کی مودر گی که درست سن کو کس Aga Relavation کی تقام اخراض بنا دس مداس شاخی کار داد دست عدن مرف اصل شاخی کار و لا کان دی ہے (4) میر رہ پر آفراد کی که درست سن کو کس Aga Relavation کی جائے گا(3) اغروبی کر دقت اس تقلیمی اسا دمید دارون کو بردا شت کر کا مداف اور نسب و ان مرف اصل شاخی کار و لا کان دی ہے (4) میر رہ پر آفراد گیا ہے کے دون کی است مداف اور کا مداف اور کی جائی کار و پر کہ تا آفراد میں بی تو کی جائی کی محرف این کر معاد کر ایک است کا مداف اور است کار کی جائی کی جس کتام احماد اور اس مداور دان کو برداخت کر کا مداف و پر کہ تا آفراد کی بی دی جائی کی معاد کو بایش کرد اور کی ایک معاد کان مداف اور کار کان کار معاد میں بی کر کی جس کتام اخراص اس دوارون کو برداخت کر کا مداف کر دی کر معاد کی دولوں کر کی کار مداف کرد اور کی است کر معاد کر محد است میں پڑ کی جائی کی میں کی معاد کا کی کرد کی کار معاد کر دولوں کر کی کار مداف کر دی دولی (9) مداف کر دولوں کر کی کار مداف کر دولوں کر کی کار مداف کر دولوں کر کی کار معاد کرد میں کرد دولوں کرد کر کار کار مداف کر معاد کرد میں کرد کر کی کار مداف کرد دولی کار کرد دولی کار کی کار معاد کرد کر کی کار معاد کرد دولی کر کار کار مداف کرد دولی کرد دولی (9) معاد کرد دولی کار کی تعاد معاد کر کرد دولی (9) معاد کرد دولی (9) تعاد کر کی کار کی تعاد کرد دولی (9) معاد کرد دولی (9) معاد کرد دولی (9) معاد کرد دولی (9) کی تو محد کرد دولی (9) کرد معاد کرد دولی (9) کی تو معاد کرد دولی (9) تعاد کرد دولی کی کار کی تعاد کرد دولی کار معاد دولی کرد دولی کرد دولی کرد دولی کرد کر کی کار کی تعاد کرد دولی ک دولی میز کرد کرد کرد کرد کرد دولی کرد دولی کار دولی کر تعد مرکز کرد دولی کرد دو

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المجر المنتج والدار سوده والعواد ومروع مسوحتوا وتعتري ال

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1 S.NO: 110 Page NO: 23 FINAL SENRIOTY LIST OF CTS O/O THE DISTRICT EDUCATION OFFICER (M) DISTRICT SWAT UPTO 31/05/2018

		FINAL SENRIOTY L	IST OF	LIS 0/0	THE DISTRIC	I EDUCA	non	FFICER IN		WAT OFTO 3.	(/05/2018
	The second of the second				· · · · · · · · · · · · · · · · · · ·				E 27.1 H	Date of /	Seniority position.
	Name of		Desi				Aca			japptt:	D/O taking over charge
s hai	Teacher/Qualification	Father's Name	Ues	000	D/O Birth	Domic		Profess	D/O 1st	against	
			giiau	PBS	/ Domicile	ile	denn	-ional	Apptt		declaration CT Exam:
Indaa-		A CARLES AND A CARLES	on		125-1		2 <b>3</b> 5./	- Sec 23	Section 20		
	academic I professional		in an	. 5	(Aside		AST IN	1.177.4	がないないで	postada	whichever is later 😥
1	Hamayun Khan 🥠	Khairullah	SCT	16	THE DISTRIC D/O Birth / Domicile // // // / / / / / / / / / / / / / /	Swat	MA	ст	5/8/1984	5/8/1984	5/8/1984
		Muhammad Kamal	SCT	16	4/1/1961	Swat	BSc	CT/B.Ed	5/3/1986	5/3/1986	
3		Muhammad Junain	SCT	16	3/15/1966	Swat		CT/B.Ed	10/11/1982	10/11/1982	1/6/1987
		Umar Bakht	<u>sci</u>	16	3/3/1961	Swat		CT/B.Ed	8/1/1982	8/21/1982	5/26/1987
5		Swal Fagir	SCT	16	3/4/1962	Swat		СТ	9/17/1987	9/17/1987	9/17/1987
6		Mahmood Khan	SCT	16	1/1/1960			ct j	11/6/1982	11/6/1982	
7	Muhammad Ali t	Said Mahmood	SCT	16	2/3/1959	Swat	BA	CT	8/17/1980	1/8/1988	
8	Toti Rahman 4	Fazal Rahman	SCT	16	2/7/1960	Swat	MA	СТ	7/10/1982	7/10/1982	11/30/1988
9		Amanullah Khan	SCT	15	3/1/1965	Swat	MA	CT/B.Ed	1/15/1985	4/26/1989	
10		Muhammad Zarin	SCT	16	5/11/1962	Swat	MA	CT	3/9/1982	9/17/1989	
11	Rahmat Ali	Abdul Ghafar	SCT	16	5/4/1963	Swat	MA	CT/B.Ed	7/20/1982	10/1/1989	
12	Fazal Rahim 1	Fazal Ahad	SCT	16	1/1/1961	Swat	MA	CT	11/13/1984	10/1/1989	
13	Azizullah :	Tota	SCT	16	10/1/1964	Swat	MA	רד		11/15/1983	
14	Shah Rom Khan	Hakim Khan Mian	SCT	16	1/1/1962	Swat	MA	α	3/1/1988	3/1/1988	
15	Sadio Ahmad	Abdul Hamid	SCT	16	1/4/1961	Swat	MA	רז	6/1/1988	6/1/1988	
16	Muhammad Rafig	Badish	SCT	16	3/1/1963	Swat	B.Sc	CT	2/6/1990	2/6/1990	
17	Fida Hussain	Hazrat Ahmad	SCT	16	2/3/1964	Swat	MA	CT	2/8/1990		
18	Hedayatullah 3rd Division		SCT	16	1/1/1959	Swat	MA	CT/B.ed	4/18/1983		
19	Rashid Ali	Ghulam Nabi	SCT	16	3/12/1968		MA	СТ	12/8/1990		11/14/1990
20	Zahid Khan 1	Pir Dad	SCT	16	4/9/1965		BA	ст	12/9/1990		
21	Hazrat Bilal 1	Zirat Gul	SCT	16	2/8/1963	Swat	MA	CT		12/11/1990	
22	Aziz Ahmad	Fazal Khalig	SCT	16	4/4/1969	Swat	MSC	CT/B.Ed		12/11/1990	
23	Fazal Wahab	Gul Mahmood	SCT	16	12/12/1964	Swat	MA	ст	5/6/1986		
24	Muhammad Majid	Umar Zada	SCT	16	1/1/1966	Swat	MA	CT	5/4/1986		
25	Rahman Deyar (	Sultan Mehmood	SCT	16	1/1/1964	Swat	BA	<u> </u>	11/5/1986		
26	Haroon - Ur - Rashid	Khisat Gul	SCT	16	8/1/1962	Swat	BA	CT		11/24/1986	
27	Muhammad Alam	Alam Zeb Khan	SCT	16	4/1/1963	Swat	MA	CT	4/2/1987		
28	Adalat Khan	Abdur Rashad	SCT	16	12/9/1961		MA	СТ		11/24/1984	
29	Akhter Ali	Ghulam Muhammad	SCT	16	5/15/1964	Swat	BA	СТ	3/11/1985		
55	Imran Ali	Mashoog Ali	SCT	16	3/20/1959		MA	CT	5/6/1986		
31-	Muhammad Rahman	Bakht Zad	SCT -	16	1/10/1967	Swat	FA	СТ	5/17/1987		
32	Sharafat Ali Khan	Afsar Khan	SCT	16	2/2/1961		MA	CT	3/1/1988		
33	Amir Zeb	Muhammad Zareen	SCT	16	4/2/1964		BA	СТ	6/1/1988	6/1/1988	
34	Amir Muhammad	Tota Mian	SCT	16	5/15/1963		BA	CT/B.Ed	9/22/1987		
35	Akhtar Hussain 3rd Divi	Ahmad	SCT	16	3/2/1967		BA	СТ	8/14/1992		
36	Muhammad Ziaud Din	Habibur Rahman	SCT	16	3/10/1968		MA	CT/B.Ed	9/2/1986		
37	Sultan Rome	Shah Rome	SCT	16	4/8/1966		MSC	CT/B.Ed	9/2/1992		
38	Umar Hussain	Malak Sherin	SCT	16	1/1/1962		MA	СТ	4/23/1988		
39	Muhammad Nabi	Ghulam	SCT	16	5/1/1963		MA	CT/B.Ed	4/17/1988		
40	Jamshid Khan	Hazrat Jee	SCT	16	4/14/1966		BA	CT/B.Ed	11/1/1986		
41	Bakhtyar 3rd Divi	Bacha	SCT	16	7/3/1964	• Swat	BA	CT/B.Ed	1/20/1990	1/20/1990	4/29/1993

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## FINAL SENRIOTY LIST OF CTS O/O THE DISTRICT EDUCATION OFFICER (M) DISTRICT SWAT UPTO 31/05/2018

							· · ·		5.7 1.1	Date of	Seniority position
7	Name of		Desi				Aca		D/O 1st a	apptt:	D/O taking over charge
S.No	Teacher/Qualification	Father's Name	gnati	PBS	D/O Birth	Domic	Aca demi	Profess	D/O 1st a	against	as CT or D/O
New-	academic /	Fattlet S Maine	on		/ Domicile	s_ile	1 3 5 2	∥∴ionai…i	Apptt:	Present	
ابد	professional	<ul> <li>B. A starting the starting for the starting of th</li></ul>		Sec. 2	1.4.1 March 1.	. 22	C		in a state of a	Fiesem	declaration CT Exam:
$\mathcal{T} \rightarrow \mathcal{T}$	professional		1. C. C.	4 - A -	- <b>4</b> -4	v 94,4	15-2-3-9	1. C. 1.		post	whichever is later.
42	Ashraf Ali	Hazrat Ali	SCT	16	5/12/1965	Swat	MA	CT/8.Ed	5/8/1993	5/8/1993	8/5/1993
43	Shah Bakht Rawan	Umara Khan	SCT	16	1/7/1964	Swat	MA	CT	9/24/1989		12/25/1993
44	Muhammad Hamayun	Faramoz Khan	SCT	16	1/2/1965	Swat	BA _	СТ	10/2/1989		12/25/1993
45	Amir Bahadar	Sarwar Gul	SCT	16	5/1/1962	Swat	MA	CT/B.ed	3/10/1989	10/3/1989	12/25/1993
46	Bakht Sherwan	Fazal Rahman	SCT ··	16	2/24/1967	Swat	BA	CT	11/29/1989	11/29/1989	12/25/1993
47	Bakht Muhammad	Muamber Khan	SCT	16	1/16/1967	Swat	BA	СТ	11/30/1989	11/30/1989	12/25/1993
48	Noor Rahman	Jumma Gul Khan	SCT	16	5/1/1965	Swat	BA	СТ	12/4/1989		12/25/1993
	Mehboob Ali	Amir Rahman	SCT	16	2/1/1963	Swat	BA	CT	12/12/1989	12/12/1989	12/25/1993
50	Muhammad Sadiq	Qalandar	SCT	16	9/11/1965	Swat	BA	CT/B.ed	12/14/1989	12/14/1989	12/25/1993
51	Maqsood Ahmad	Dawray	SCT	16	6/5/1963	Swat	MA ·	CT/B.Ed	12/17/1989	12/17/1989	12/25/1993
52	Shuja Mulk	Said Karam	SCT	16	12/3/1966	Swat	BA	CT	10/3/1989	1/4/1990	12/25/1993
	Alamgir	Sadbar Khan	SCT	16	1/20/1960	Swat	MA	CT/B.Ed	6/10/1990	6/10/1990	12/25/1993
	Anwarullah	Hasham Khan	scr	16	3/1/1969	Swat	MA	CT/B.Ed	<b>9/26/1988</b>	11/10/1994	11/10/1994
	Fazal Hameed	Fazal Wahab	SCT	16	4/15/1969	Swat	MA	CT/B.ed	11/10/1994	11/10/1994	11/10/1994
	Nadar Khan	Mian Said Buhar	SCT	16	3/3/1966	Swat	MA	CT .	9/8/1986	11/11/1994	11/11/1994
	Bad Shah Ikhan	Amir Rawan	ŚСТ	16	5/1/1965	Swat	MA	CT/B.Ed	6/14/1987		11/12/1994
	Sher Bahadar Khan	Gul Zaman	SCT	16	1/1/1964	Swat	BA	CT	12/12/1989		11/15/1994
	Aziz Ahmad	Muhammad Rashid	SCT	16	2/2/1964	Swat	<b>MA</b>	CT/B.Ed	11/10/1994		11/15/1994
	Afzal Shah	Badshah Zada	SCT	16	5/12/1967	Swat	MA	CT/8.Ed	11/15/1994	i anni a muia a	11/15/1994
<u>~~</u>	Bakht Alam	Ghulam Qadir	SCT	16	3/20/1969	Swat	MA .	CT/B.Ed	11/15/1994		11/15/1994
	Muhammad Rahman	Sherin Jalal	SCT	16	2/1/1965	Swat	MA	CT/8.Ed	12/1/1986		11/16/1994
	Sher Ali Khan	Sadar	SCT	16	2/11/1968	Swat	MA	CT/M.Ed	8/1/1987	11/16/1994	11/16/1994
ļ.	Ziaullah Khan	Muhammad Alam Gul	SCT	16	7/20/1969	Swat	MA	CTB.Ed		11/16/1994	11/16/1994
	Muhammad Munir	Habibullah Khan	SCT	16	4/2/1964	Swat	MA	CT/B.Ed	9/28/1988	1	11/18/1994
_	Gul Pervize	Rahmani Gul	SCT	16	1/20/1965	Swat	MA	CT/B.ed	11/21/1984	1	11/21/1994
	Abdul Qadoos	Ghulam Khalig	SCT	10	6/5/1964	Swat	B.Sc	CT	5/12/1992	11/24/1994	11/24/1994
	Sarir Ud Din	Fazal Wahid	SCT	16	3/26/1963	Swat	M.Sc	CT/M.Ed	11/27/1986	the second s	12/20/1994
	Muhd Zahir Shah	Azizur Rahman	SCT	16	12/2/1960	Swat	MA	CT/B.Ed	4/2/1987		12/21/1994
	Muhammad Ghafar	Khan Bahadar	SCT	16	2/27/1961	Swat	MA	CT	6/7/1987		12/21/1994
	Amanullah Khan	Sakhi Rawan	SCT	16	9/12/1961	Swat	MA	CT/M.Ed		12/21/1994	12/21/1994
	Sher Azim Khan	Taj Muhammad Khan	SCT	16	9/9/1958	Swat	MA	CT/M.Ed		12/21/1994	12/21/1994
	Fatehur Rahman	Fazal Rahman	SCT	16	2/2/1969	Swat	MA	CT/M.Ed	6/24/1987		12/22/1994
	Rafiq Ahmad	Hermooz Khan	SCT	16	1/1/1965	Swat	MA	CT	9/29/1988	1/10/1988	12/25/1994
	Alam Zeb	Abdul Jabbar	scr	16	4/15/1965	Swat	BA	CT/B.Ed	12/25/1994		12/25/1994
	Inamuliah Khan	Muhammad Karam	SCT	16	1/1/1968	Swat	MA	CT	9/4/1986		12/23/1994
	Alam Zeb	Bughdaday	SCT	16	1/1/1960	Swat	MA		12/27/1994		12/27/1994
	Azizullah	Haji Muhammad	SCT	16	2/16/1964	Swat	MA	CT/M.Ed	9/26/1988	1/1/1995	1/1/1995
	Amiad Ali	Fagir Khan	SCT	16	4/10/1966	Swat	MA	CT/B.Ed	12/5/1989	12/5/1989	1/1/1993
	Samiullah	Roohul Amin	SCT		2/15/1965		MA	CT/B.Ed	5/3/1986	5/3/1986	1/9/1995
	Dost Muhammad Khan	Taj Muhammad Khan	SCT	16 16	3/8/1958	Swat Swat	BA	CT/B.Ed	4/1/1987	4/1/1987	1/9/1995
-	Wazir Zada	Gulzar Khan	SCT	16	5/1/1967	Swat	BA .		10/1/1989	10/1/1989	1/9/1995

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94	- professional			22.33			مد بوسو ۲۰۱ مرتق د د		1.1	post in	whichever is later
83	Anwar Iqbal	Khan Sherin	SCT	16	5/1/1961		MA	CT/B.Ed	10/2/1989		1/9/1
84	Mehammad Zahir Shah	Shahzada	SCT	16	2/2/1965	Swat	MA	CT/B.Ed	11/28/1989	11/28/1989	1/9/1
85	Bakhtmand	Siahoosh Khan	SCT	16	6/5/1963	Swat	MA	CT/B.Ed		12/10/1989	1/9/1
86	Mukaram Khan	Musharaf Khan	SCT	16	6/5/1963	Swat	8A	CT/8/Ed	1/13/1990		
87	Aftal Hussain	Bahroz Khan	SCT	16	5/25/1962	Swat	MA	CT/8.Ed	1/19/1990	1/19/1990	1/9/1
88	Zahoor Hayat	Sher Alam Khan	SCT	16	1/1/1969	Swat	BA	<u>CT</u> ,	1/19/1990	1/23/1990	1/9/1
89	Farzand Ali 🔹	Syed Rashad	SCT	16	3/15/1963	Swat	BA	ст,	2/15/1990	2/15/1990	1/9/1
90	Anhir Zeb Khan	Bakht Biland Khan	SCT	16	2/18/1963	Swat	BA	CT ·	3/1/1990	3/1/1990	1/9/1
91	Fazal Rahman	Amir Faqeer	SCT	16	3/10/1963	Swat	MA	CT	4/1/1990	4/1/1990	1/9/1
92	Gul Muhammad Shah	Mubin	SCT	16	2/5/1964	Swat	MA	СТ	4/14/1990		1/9/1
93	Muhammad Laig	Amir Hamza	SCT	16	6/1/1963		MA	CT/B.Ed	4/21/1990		1/9/1
94	All Bash Khan	Shah Dilbar Mian	SCT	16	3/17/1969		MA	CT/B.Ed	5/13/1990		1/9/1
95	Akbar Ali	Qaisar Khan	SCT	16	1/1/1963		MA	CT/B.ed	\$/13/1990		1/9/1
96	Alamgir	Khalilur Rahman	SCT	16	7/1/1964	Swat	MA	CT/B.Ed	\$/13/1990		1/9/1
97	Fazal Azim	Ahmad	SCT	16	12/1/1959		MA	cī .	8/20/1990		1/9/1
98	Karim Ullah	Muhammad Karim	SCT	16	3/15/1970		MA	CT/B.Ed	10/10/1988		1/9/1
- 99 -		Amir Hatam	SCT	16	6/17/1959			CT/B.Ed -	-5/24/1992	5/24/1092	1/9/1
100	Ruhul Amin	Muhammad	SCT	16	4/3/1966	Swat	MA	CT	9/1/1989	12/1/1994	▲ 1/9/1
101	Muhammad Fahim Khan	Ahmad Shah	SCT	16	3/7/1963			CT B.Ed	6/11/1987	1/16/1995	1/16/1
102	Muhammad Dawood Khai	Amanullah Khan	SCT	16	4/26/1967		MA	CT M.Ed	9/25/1992	1/16/1995	1/16/1
			SCT	16	4/21/1959		BA	cr	3/6/1990		1/18/1
104	Jehan Sher	Umara Jan	SCT	16	5/1/1962			CT/B.Ed	1/19/1995	1/19/1995	1/21/1
	Hanif Khan :	Abdul Qadir Khan	SCT	16	1/12/1967		MA	CT	₽/20/1990	2/1/1995	2/1/1
106	Abdul Wahab	-	SCT	16	3/3/1969			СТ	2/21/1995	2/22/1995	2/22/1
107	Sajawal Khan		SCT	16	5/5/1964		MA	ст	2/2/1995	4/10/1995	4/10/1
108	Anwar Zeb	Alam Zeb Khan	SCT	16	5/4/1970			CT/M.Ed	2/2/1995	4/10/1995	4/10/1
109	Kishwar		SCT	16	1/1/1967		BA	CT/B.Ed	4/7/1988	4/16/1995	4/17/1
	1		SCT	16	5/1/1970		MA	CT/M.Ed	11/7/1994	4/17/1995	4/17/1
111	Bakht Biland		SCT	16	1/30/1966		BA	СТ	10/17/1988	5/15/1995	5/15/1
	Muhammad Sadiq		SCT	16	11/8/1962		MA	СТ	8/8/1984	8/1/1995	8/1/1
113-	Khaista Mand		SCT	16				CT/B.Ed	5/14/1992	. 8/1/1995	8/1/1
114			SCT	16	4/5/1964			CT/B.Ed	2/29/1984	8/7/1995	8/7/1
	1		SCT	16	1/1/1967		8A	CT/B.Ed	8/22/1995	8/22/1995	8/22/1
		Naik Muhammad	SCT	16	3/15/1963			СТ	9/27/1988	8/24/1995	8/24/1
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			SCT	16	3/20/1964		MA	CT	4/3/1995	9/15/1995	9/15/1
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	Muhammad Afzal Khan :		SCT	16	10/1/1970			CT/B.Ed	9/24/1995	9/24/1995	1/24/1
			SCT	16	4/16/1975			CT	5/1/1996	5/1/1996	5/1/1
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GOVERNMENT OF THE KHYBER PAKHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13,201;

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

ATTESTEL

Endst. No. & Date as abo-

<s ₹ :

Copy forwarded to:-

- 1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department. 2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department. 3. The Secretary to Govt. of Khyber Pakhlunkhwa, Law Department.
- 5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
- The Secretary Kryber Pakhtunkhwa, Public Service Commission Peshawar,
- The Director (E3SE) Khyber Pakhtunkhwa Peshawar. 7. The Director Education (FATA), Peshawar,
- 8. Copy to Malgari Ustazan KPK

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

- . Soldenat

8. The Director Curriculum & Teachers Education Appoilabad.

- 0. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 0. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar,
- 11. The Deputy Director Database(EMIS) E&SE Department.
- 12. All District Coordination Officers in Khyber Pakhlunkhwa.
- 13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtury wa.
- 13. All Executive Counts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA. 15. All Agency Education Officers FATA.
- 16, P.S to Governor, Khyber Pakhtunkhiva.
- 17. P.S to Chief Minister, Khyber Pakhtunkhwa
- 18. P.S to Chief Secretary, Khyber Pakhtunkhwa,
- 19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar
- 20. PS to Secretary E&SE Department.
- 21. Master File.

## ATTESTED

Section Officer (Primary)

## BETTER COPY OF ANNEXURE.....



	i		5 T 700			
S.NO.	Nomenclature	Minimu	NDIX	· · · · · · · · · · · · · · · · · · ·		
	of the post		I	Age	Method	of
	or the post	qualification	and	limit	recruitment.	
		experience	for			
	•	initial appoir	Itment			
		or by transfe	r			• •
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	1	· · · · · · · · · · · · · · · · · · ·
2.	Seniority	<ul> <li>(iv) one percent from amongst the Instructional Material Specialists, with at least five years service as such and having qualification mentioned in column No. 3, and</li> <li>(v) one percent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No. 3, and</li> <li>(b) fifty percent by initial recruitment. By promotion on the basis of</li> </ul>
Z.	Arabic Teacher (SAT) (BPS-16)	By promotion on the basis of seniority-cum-fitness from amongst Arabic Teachers with at least five years service as such and having qualification as prescribed for initial
3.	Senior Theology Teacher (STT) (BPS-16)	recruitment of Arabic Teacher. By promotion on the basis of seniority-cum-fitness from amongst Theology Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4. Senior Certified Teacher (SCT) (General) (BPS-16)		By promotion on the basis of seniority-cum-fitness from amongst Certified Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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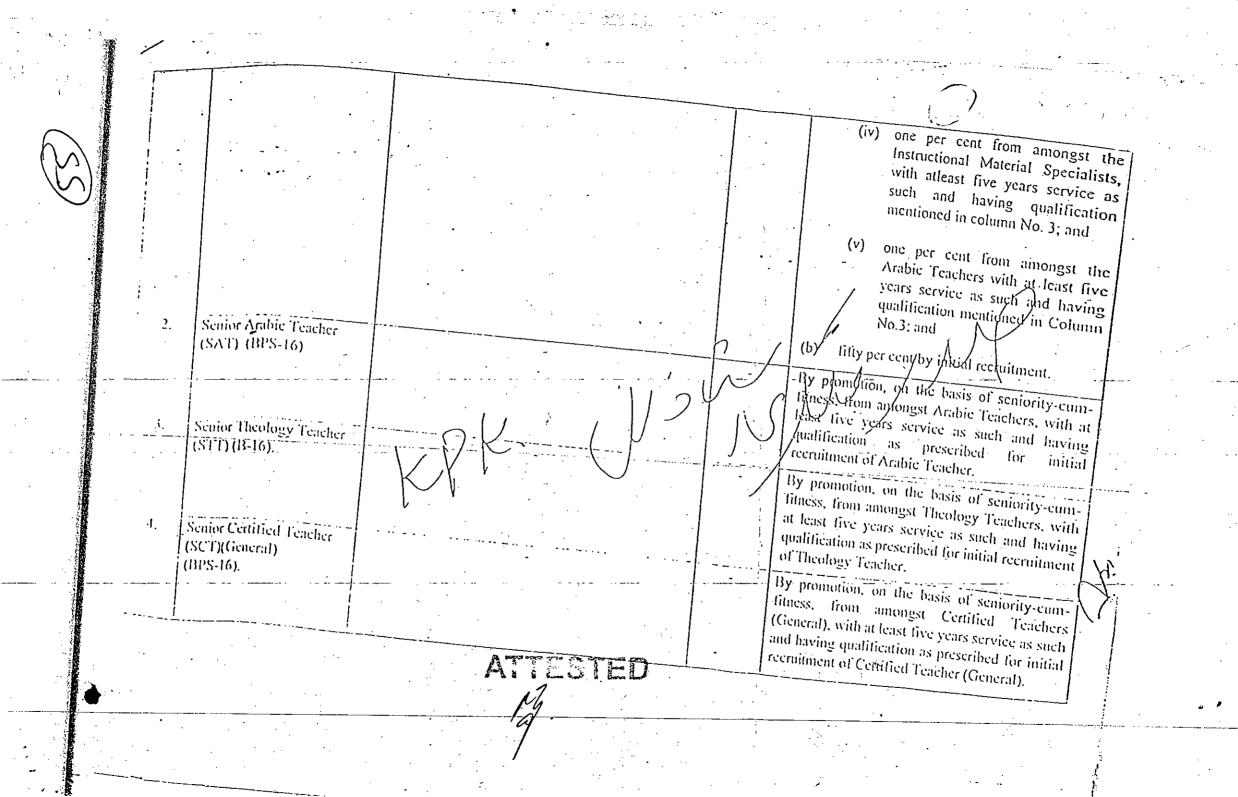
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• • • • • • • • • • • • • • • • • • • •				(36/
	TTER COPY O         Arabic         Teacher         (AT) (BPS-15)	(i) Second Secondary Certificate fro recognized Boa Shahdatul Alar Uloomul Arabi Islamia from o Uloom Saidu Swat, Darul	School m a rd with nia Fil a wal r Darul Sharif Uloom Chitral, n Darul fied by it from Class ee in	By initial recruitment
· 11	Teacher (TT) (BPS- 15)	recognized Unive (i) Second Secondary Certificate fro recognized Boar Shahdatul Alan Uloomul Arabi	rsity. Class School om a d with nia Fil a wal Darul Sharif Uloom Chitral, Darul ied by t from Class ee in a	percent by initial recruitment; and (b) twenty five percent by promotion on the basis of seniority-cum- fitness from amongst the senior Qaris with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher; Note: In case of non availability of suitable person for promotion then by initial recruitment.
12 M	(BPS-15)	<b>.</b>	-	By promotion on the basis of seniority- cum-fitness from amongst Qaris with at least five years service as such and having qualification as prescribed for initial recruitment.
, 13	Certified Teacher (General)	Bechlor's Degre equivalent quali from a reco	1	(a) Forty percent by initial recruitment; and

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Certified or two years (b) sixty percent bv Associate Degree in promotion on the basis of Education from a seniority-cum-fitness recognized University from amonast the or eighteen months Primary School Head Diploma in Education. Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General). that Provide if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filed by promotion on the basis of seniority-cumfitness from amongst senior primary school teachers with at least five years service and having qualification prescribed for initial recruitment of certified teacher (General). Note: In case of non availability of suitable person for promotion then by initial recruitment. 14. Certified (i) Bachelor's Degree (a) Forty percent by Teacher from a recognized initial recruitment; and (Industrial University with two (b) sixty percent by Arts) (BPSyears training in the promotion on the basis of 15) relevant technical seniority-cum-fitness subjects from any from amongst the Government industrial primary school head or Govt: Technical teachers with at least five vocational Institute or years service and having All a line of the free day Centre; or qualification prescribed (b) Bechlor's Degree for initial recruitment of from a recognized certified teacher

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	streets	•	•		APPENDIX		•			
			·	· · ·	• • •			• • •	24	
		Nomenclature of the	Min	imum qualification a	und experience for		·			
(1)	S.No.	<u>post.</u> 2	<u> </u>	initial appointment of	r by transfer.	Age limit.	•	Method of recru	titment.	
$\sim$		Secondary School Teacher	<u> </u>	۲. ۲		4., .		· · · · · · · · · · · · · · · · · · ·		
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			an an	ad other equivalent	Statistics Humanities	-	~,	nner:	ss, in the following	g
			rei	cognized University: o	$\frac{g_{\rm coups}}{v_{\rm c}}$ from a		(1)	-		1
		-						Certified Tea	from amongst the	:
	6		(ii) M	A in Education or	Bachelor's Degree in	•		Certified Teach	chers (General) ers (Agriculture).	.
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()	10.	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, 20 to 35 By initial recruitment , from a recognized Board with Shahdatul years. Alamia Fil Uloomul Arabia wal Islamia from
NS)			a recognized Tanzimuatul Wafaqul Madaris: or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral,
2000 - 2000 -			Darut Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by
			the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.
	ll.	Theology Teacher (TT) (BPS-15).	<ul> <li>(i) Second Class Secondary School Certificate, 20 to 35</li> <li>(a) Seventy-live per cert by initial from a recognized Board with Shahdatul years.</li> <li>Alamia from a recognized Tanzimatul-</li> <li>(b) twenty-live per cent by promotion, on the</li> </ul>
			Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosli
		· ····································	Uloom, as notified by the Government from the formed for initial recruitment of Theology Teacher:
			(ii) Second Class Master's Degree in Islamiyat from a recognized University.
	12.	Senior Qari	By promotion, on the basis of seniority-cum-
		(BPS -15).	timess, from amongst Qaris, with at teast five years service as such and having qualification prescribed for initial recruitment.
	13,	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a 18 to 35 (a) Forty per cent by initial recruitment; and recognized University with Certified Teacher years.
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Certificate or two years Associate Degree in Education from a recognized University or eighteen sixty per cent by promotion, on the vasis (b) months Diploma in Education, : · ci seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General): Provided Ilat if no suitable candidate is available amongst the Primary School Head Teachers for trassfer, then the posts will be tilled by promotion on the basis of seniority-cuminteess, from amongst Senior Primary School Teachers with at least five years and having qualification service prescribed for initial recruitment of Certified Teacher (General). Note: In case of non availability of suitable \_\_\_\_\_person\_for\_promotion\_then\_by\_initial. 14. Certified Teacher Bachelor's Degree from a recognized recruitment. (i) (Industrial Arts) 18 to 35 Forty per cent by initial recruitment; and University with two years training in the (a) (BPS-15). years. relevant technical subjects from any sixty per cent by promotion, on the basis Government Industrial or Govt. Technical (b)Vocational Institute or Center; or of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial Bachelor's Degree from a recognized (b) recruitments of Certified Teacher ATTESTED

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Category of Qualification	Total Marks 100 For Humanities group at Intermediate Level	For Candidate of Science group
SSC HSSC	Marks obtained X 201 total marks =	5 Extra marks for FSc, 5 Extra marks for B.Sc and 5
B.1/BSc	Marks obtained X 10 / total marks =	Estra marks for M.Sc will be added to the total - score obtained by a candidate during his selection
PST Certificate/ Diploma in	Marks obtained X 25/ total marks =	0
Education IADE." MAIMSc/M.Ed / MA Edu	Marks obtained X 20 / total marks =	
MPhilPhD	Marks obtained X 20 / total marks =	1/ 19 11/

Other conditions:-

The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents varified after the issuance of apprintment orders within shortest possible time, not exceeding ninety (90) days. 2. The secrit list prepared by the expected appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final

after making necessory corrections while addressing the observations objections appeals, followed by requisite appointment orders. 3-In case a document(s) istar found faket forged bogus upon scruting verification, the service of the teacher concerned -shall be terminated and the amount\_

paid to him as sulary shall be recovered from him and an FIR shall be lodged against him on account of forgery fraud under the relevant law. 4. Deni Asnad from recognized Tozeemat-ul-Wafaqul Madaris, Darul Uloom Saidu Sharif Swat, Darul Uleom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time will be acceptable for the purpose of oppointment against the posts of Arabic Teachers or Theology Teachers, as the case may be,

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2. Urdu 4.	Pakistan Studies 6. Chemistr	y 8. Biology	が計画
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# Aniversity of Peshawar

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3	The	Examination	was taken a	s a whole /	
Serial	Nº 026546-		Non in the second	Allerte	- P Registrar
Registered	• £• _ <u>92-</u> ₽/ <b>C</b> =14	4701	<b>D</b> MAR	Com	Countersigned
Roll No. Result dec	70412 - Clared on MARCH 7	<u>, 1996</u>		Head Master Govt: High Sci Qandii Swet	- IN

# University of Peshawar

(Pakistan)

Session Annual 2002

	NASEER HASSAN		Son of	Shah Nazar	and a stude
of	DISTRICT SWAT		— having	passed the p	rescribed examination
held in	SEPTEMBER 2002	is this			Aniversity of Peshaw
		t	o the Degi	ee of	
· · · ·		M	aster of	Arts	All, ded
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			مسبيدين يملاد		Registra
Registration 3	<b>P</b> o. <u>92-PĆ-14701</u>	-			
Roll 20. 291					Countersigned
Result Declare	ed on MARCH 31,2003		CARGO STAND	Y I	Him Chancellor

Dice-Chancellor

1469 97.t.12 Serial No. BE 65511 رول لمبر رجسٹرڈ لمبر REGISTERED NUMBER ROLL NUMBER UNIVERSITY OF THE PUNJAB بونيورسه 1997 This is to Certify تصدیق کی جاتی ہے Naseer Hassan that son falanaghters of Shah Nazar گورنندٹ کالج آف ایجوکیشن نارمین \_ Govt.College of Education for Men,Lahore of the نے اس بولیورسی کے استحان منعقد، <sup>اگست</sup> ۱۹۹۸ کی بنا پر has obtained the Degree of Bachelor of Education in this University at the Examination held کې دگر ی درجه میں حاصل کی دوم in August, 1998 and that he/she was placed الہوں نے استحان میں کلی / xللاہیزلا شرکت کی Head Master Govt: High Schoo Division. اس استحان میں ان کے خاص مضامین یہ تھے : in the second Qandil Swat (1) <sup>1</sup> ارد و (۲) اسلامیات The Examination was taken as a whole in stants. الہوں نے اختیاری مضمون xxxxxxxxx Special Subjects offered : Indax کامیاہی حاصل کی 2 Islamiyat (1) Urdu لمبر حاصل كرده ١١٠٠/٢٣٢ Optional Subject Also passed in XXXXXXXX CHANCELLOR جائسار Marks obtained. 634/1100 Auchan mand CONTROLLER ول استعانات لا هور : LAHORE

27 Maria

Astars Inthal Open Mainersi Azlamalah 18262 Serial No. Certified that Mr. / Ms. NASEER HASSAN Son / Daughter of \_\_\_\_\_\_ Registration No: \_\_\_\_\_ Q-671690 Roll No:\_\_\_ having completed the prescribed requirements in semester SPRING 2006 is awarded the degree of: Master of Education (MEd.) He/She has secured \_\_\_\_\_% marks and has been placed in \_\_\_\_\_ grade. ind ligh School Malmord But VICE-CHANCELLOR CONTROLLER OF EXAMINATION Result declared on: March 08,2007 July 06(2009 ISLAMABAD. DATED

channa Stabal Open Muiversik Lamabad



### Serial No. 107370

Certified that Mr /Ms NASEER HASSAN Son | Daughter of SHAH NAZAR Roll No AL658412 Registration No 05-NSI-0016 SPRING 2012 having met all the requirements under Semester the semester system is this day awarded the

Certificate of Teaching

He/She has secured and placed in

73 % maxks grade



Head Master Covt: High Scher Qandil s

Controller of Examinations

. . . Result declared on: January 16, 2013

Date of issue:

「御客がなってい」

June 21, 2013

Note: This certificate is issued without alteration/erasure. The detail of courses is overleaf.

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JUDGMENT SHEP PESHAWAR HIGH COUR (JUDICI

COC No. 105-P/2018 in

JUDGMENT.

Date of hearing: 08,11,2018

Petitioner (s): Nisar Winnel 20: Mr. Noor Mubinmond Whenter Respondent (s): Auhammad Alam WAQAR AHMAD SETH, CJ:-

Through this

single judgment, we propose to dispose of instant contempt petition as well as connected COC No. 107-P/2018 in WP No. 1662/2010, COC No. 108-P/2018 in WP No. 2967/2009 & COC No. 109-P/2018 in WP No. 3189/2009 because in all the petitions, the petitioners have sought initiation of contempt of court proceedings against the respondents for not implementing the judgment/order dated 26.01.2015.

2. Facts in brief are that the petitioners had filed Writ Petitions before this Court and prayed that the Act No. XVI 2009, namely, 'The North West Province' Employees (Regularization of Services) Act, 2009 dated 24th October, 2009' being illegal unlawful, without authority and jurisdiction, based on malafide intentions and being unconstitutional as well as ultra vires to the basic rights as mentioned in the constitution be set-aside and the respondents be directed to fill up the above noted posts after going through the legal and lawful and the normal procedure as prescribed under the prevailing laws instead of using the short cuts for

3 0 NOV 2018

obliging their own person. They further prayed that the notification No. A-14 / SET (M) dated 11.12.2009 and Notification No. A-17 / SET (5) Contract-Apptt: 2009 dated 11.12.2009, as well as Notification No. SO(G) / ES / 185 / 2009 / SS(Contract) dated 31.05.2010 issued as a result of above noted impugned Act whereby all the private respondents have been regularized may also be set-aside in the light of the above submission, being illegal, unlawful, unconstitutional and against the fundamental rights of the petitioners. The writ petitions came up for hearing and vide judgment/order dated 26.01.2015, the same were disposed of in the following terms:-

> The Act, XVI of 2009, commonly "(i) known as (Regularization Services) Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld. Official respondents are directed to workout the backlog of the promotion quota as per above mentioned example, within 30 days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh recruitments".

'(ii)

3. After passing the above said judgment, the petitioners were quite hopeful regarding their promotion to the next higher grade being senior most employees but the respondents have again started recruitment process by advertising the posts of various cadres for initial recruitment in various Districts of Khyber Pakhtunkhwa and as such, the inaction of respondents squarely fall within the ambit of

> hlian Cacht UHOV:2010

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contempt of court and they are liable to be proceeded and punished under the law; hence, the instant petitions.

4. Respondents No. 2 & 3 have filed reply to the show cause and prayed for dismissal of instant petitions.

Arguments heard and record perused.

While deciding writ petition No. 2905/2009, vide judgment dated 26.1.2015 which has been upheld by the apex Court, the respondents-department was directed to workout the backlog of the promotion quota and consider in service employees for promotion against the vacant post, till the backlog is washout. In this respect record is suggestive that the backlog was worked out and by that time 2725 employees / teachers were in the promotion zone and as such were promoted. Moreover, by virtue of Regularization Act, 2009, Act No. XVI of 2009, 1766 employees / teachers got regularization and as such, when worked out, the promotion quota was fully exhausted. The judgment in this respect was not for all the times to come for promotion purposes. Once the promotion quota, which was given advantage, in view of Regularization Act, 2009, cannot be claimed again and again. By now it's the question of fact that as to whether any employee / teacher was not promoted and by that time when Act 2009 was enforced they were in the promotion zone. Even otherwise, once backlog was worked out and promotion was done then claiming seniority and promotion is the job of service tribunal.

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In view of the above, the instant as well as S connected contempt petitions are disposed of in terms above. Show cause notice issued to respondents is hereby recalled.

Chief "ustice

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ANNOUNCED. Dated: 08.11.2018

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K. Go,

The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

DEPARTMENTAL APPEAL FOR THE GRANT OF PROMOTION TO THE POST OF SECONDARY SCHOOL TEACHER (BPS-16) FROM THE DATE WHEN THE PROMOTION QUOTA WAS FILLED UP THROUGH INITIAL RECRUITMENT OR FROM THE DATE OF COMMENCEMENT OF THE ACT NO.XVI OF 2009 COMMONLY KNOWN AS REGULARIZATION OF SERVICES ACT, 2009 NOTIFIED IN THE OFFICIAL GAZETTE ON 24.10.2009 WITH ALL BACK BENEFITS.

#### <u>Respected Sir,</u>

With due respect it stated that I was initially appointed as PST in your good self Department vide order dated 03.12.1990 and later on was appointed as C.T vide order dated 23.02.2015. During service as Certified Teacher I was in the promotion zone to the post of SST (BPS-16) but the concerned authority instead of promoting me advertised the said posts of SST (BPS-16) on adhoc/contract basis. I was under protest and my colleagues applied for the said post through initial recruitment but the same was also refused to me and my colleagues on the pretext that regular employees are not entitle to apply for the adhoc/contract posts of SST (BPS-16) thus me and my colleagues were deprived from the prospects of promotion. It is pertinent to mention that at the time of above mentioned advertisement the post/cadre of C.T (BPS-15) to which I belong have no prospects of promotion. In light of the said advertisement new appointments were made by the authorities on adhoc basis and even the promotion quota was also filled by the authority though initial recruitment. In the meanwhile the Provincial Government Promulgated the employee's regularization Act, 2009 whereby all the adhoc employees who were appointed as SST on temporary basis were regularized thus further affected the cadre to which I belong. That the promotion quota for which me and my colleagues have waited for decades has been washed by operation of the said Act of 2009. I was feeling aggrieved alongwith my others colleagues knocked the door of the Peshawar High Court through various writ petitions including writ petition No.2905/2009. That vide consolidated judgments dated 26.1.2015 the said writ petitions were disposed of with the directions that:

### (i)- The act.XVI of 2009, commonly known as (Regularization of services) act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.

(ii)- Official respondents are directed to work out the backlog of the promotion quota as per above mentioned example, within thirty days and consider the in service

employees, till the backlog is washed out, till then there would be complete ban on fresh recruit. The concerned authority assailed the said judgment of the august Peshawar High Court Peshawar in CPLAS No.127-P to 129-P/2015 but the same were dismissed as withdrawn vide judgment dated 20.9.2017. That then after me and my colleagues time and again visited the concerned quarter for our promotion to the next higher scale but the concerned authority instead of redressing the grievances advertised the posts through initial recruitment through various advertisements. That it is pertinent to mention that I am the senior most CT (BPS-15) of your good self Department and also eligible in all respect for promotion to the post of SST (BPS-16). I am feeling aggrieved filed this Departmental appeal before your good self for redressal of my grievances.

It is therefore, most humbly prayed that on acceptance of this Departmental I may very kindly be promoted to the post of SST (BPS-16) including seniority with all back benefits w.e.f. the date when the promotion quota was filled up through initial recruitment.

Dated: 12.6.2019

Your Obediently

NASEER HASSAN CT (BPS-15), GHS Dandil

District Swat

G ..... 2D. NWFP. 662 D. of B. 50008 P.- 12-3-98-(18)

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## DETAIL MARKS CERTIFICATE

TRAINING CLASSES EXAMINATION P-T.C. 1990.

Roll No 1933 ... Name Nace Huson Son Daughter of Shah Nazao Miar Marks Obtained vorial No. SUBPECT TOTAL 157. Interl: Exterli 63 Ϊt, Principles of Edu, and Method of Teaching 180 44 Child Devept: and Counselling 2 100 66 School Org: and Class Room Management 3. 100 Lang: and Method of Teaching 4. 100 1:5 Mathematics and alsthed of Teaching 5. 100 Science and Method of Teaching ś., 100 .... Social Studies and Method of Teaching 7. 100 Islamiat and Method of Teaching 8. 100 ۹. Art and Craft, Art and Method of Teaceing 100 Health and Principle of Education 10 100 Teaching Practice 11. 200 02 

Grand Total

anel Passed/Failed-To Re-appear in

Division

69

Prepared by

Checked. Date of declaration and the second ald parts del Hose Master Govt: High Scho Qandil Swat Registrar Departmental Examination, Estimation Bepartment, N.W.F.P., Peshawar

1200

VAKALATNAMA Before the KP Service Tribanal Perhawar OF 2019 (APPELLANT) Naseer Hassan \_(PLAINTIFF) (PETITIONER) VERSUS (RESPONDENT) Education Deptt: (DEFENDANT) I/We Naseer Aassan Do hereby appoint and constitute NOOR MOHAMMAD KHATTAK, Advocate, Peshawar to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as

my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated.\_\_\_/\_\_/2019

CLIENT EPTED NOOR MOHAMMAD KHATTAK SHAHZULLAH YOUSAFZAI MIR ZAMAN SAPI **ADVOCATES** 

OFFICE: Flat No.3, Upper Floor, Islamia Club Building, Khyber Bazar, Peshawar City. Mobile No.0345-9383141

# \* <u>BEFORE THE KHYBER PAKTUNKHWA SERVICE TRIBUNAL</u> <u>PESHAWAR.</u>

Service Appeal No. 1239/2019 Naseer Hassan CT (BPS-15) GHS Qandil, District Swat.

.....Appellant

#### Versus

- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
- 2. Director Elementary and secondary education Khyber Pakhtunkhwa at Peshawar.
- 3. District Education officer (Male) Swat.

..... Respondents

### Parawise Comments on Behalf of the Respondents: Respectfully Shewith

#### Preliminary objections

: <del>.</del>

- 1. That the Appellant is not an aggrieved person within the meaning of Section 4 of the service Tribunal Act, 1974.
- 2. That the Appellant has no cause of action / locus standi.
- 3. That the Appellant has not come to this Honorable Court with clean hands.
- 4. That the Appellant has filed this instant service appeal just to pressurize the respondents.
- 5. The present service appeal is liable to be dismissed for non-joinder/miss joinder of necessary parties.
- 6. That the instant service appeal is against the prevailing law and rules.
- 7. That the Appellant has filed this instant Service Appeal on malafide motives.
- 8. That the instant appeal is badly time barred.
- 9. That the instant service appeal is not maintainable in the present form, and above in the present circumstances of the issue.
- 10. That the Appellant has estopped by his own conduct.
- 11. That the Appellant has concealed the material facts from this Honorable Tribunal.

#### FACTS:

- 1. That the Para No.1 is correct. Hence no comments.
- 2. That the Para No.2 is correct to the extent of advertisement, the rest of the Para is incorrect and not admitted. The Appellant was not in promotion zone at the time of the above mentioned advertisement. The Appellant has annexed seniority list of SCT but it is worth to mention here that there is no promotion quota from CT to SST at the time of the said advertisement. Later on in 2012 policy was promulgated and amended in 2014. According to this policy there are three categories of SST i.e SST I (Chemistry, Botany or Zoology), SST II (Physics, Maths A or B or Statistics) & SST General. The appellant will be promoted in his category on his own turn. (Policy as annexure A)

- 3. That the Para No.3 is correct to the extent that there was no promotion policy from CT BPS-15 to SST BPS-16 at the time of the above mentioned advertisement. However, as stated in the foregoing Para, now the policy exists for promotion from CT BPS-15 to SCT BPS-16 and SST BPS-16. The promotions have been made on the basis of seniority cum fitness basis according to the policy. If the Appellant felt aggrieved of any order of promotion he should file departmental appeal before the competent authority.
- 4. That the Para No.4 is correct to the extent of appointments on ad-hoc basis. The rest of the Para is incorrect and denied. On one hand the Appellant admits in Para No.3 that there was no policy of promotion from CT to SST while on the other hand the Appellant says that promotion quota was filled by appointments.
- 5. That the Para No. 5 is correct to the extent of regularization Act 2009 the rest of the Para is irrelevant as the Honorable Peshawar High Court has already declared the regularization Act as beneficial.
- 6. That the Para No. 6 is correct.

, <del>s</del>

- 7. That the Para No.7 is correct to the extent of judgments of the Honorable Courts the rest of the Para is incorrect and denied. According to the judgment dated 08-11-2018 of the Honorable Peshawar High Court in COC No. 105-P/2018 in W.P NO. 355/2011 it has clearly been mentioned that backlog was worked out by that time 2725 employees/teachers were in the promotion zone and as such were promoted. If the Appellant felt aggrieved of any order of promotion he should file departmental appeal before the competent authority.(Judgment as annexure B)
- 8. That the Para No. 8 is correct to the extent of promotion of the Appellant to the post of SCT BPS-16 the rest of the Para is denied. No one junior than the Appellant has been promoted to SST in the cadre and category to which the Appellant belongs. (Last promotion order as annexure C)
- 9. That the Para No. 9 is correct. However as stated in the foregoing paras the Appellant has to wait till his turn of promotion.
- 10. That the Para No. 10 is correct to the extent of appeal however, the Appellant has to wait till his turn of promotion. He cannot be promoted without his turn.
- 11. That the instant service appeal of the Appellant is bereft of any merit, hence liable to be dismissed inter alia following grounds.

#### GROUNDS

- A. That the Para No. A is incorrect and denied. The respondent department has to act according to the rules, policy and law. The Appellant has been treated in accordance with law, rules and policy.
- B. That the Para No. B is incorrect and denied. The Appellant has been treated in accordance with law, rules and policy. The respondent

department cannot even think of the violation of any Article of the constitution.

- C. That the Para No. C is repetition of above para, hence no comments.
- D. That the Para No. D is incorrect and denied. Detail reply of this Para has already been given in the above Paras.
- E. Para No. E is repetition of above para, hence no comments.
- F. That the Para No. F is incorrect and not admitted. As stated in the foregoing Paras, the respondents have acted in accordance with rules and policy.
- G. That the Para No. G is again the repetition of the Paras, hence no comments.
- H. That the Para No. H is irrelevant to the present issue, hence no comments.
- I. That the Para No. I is irrelevant, however the respondents also seek permission of this Honorable Tribunal to advance further grounds at the time of arguments.

It is, therefore, very humbly prayed that the instant service appeal of the Appellant may be dismissed with cost in favor of the respondents.

DISTRICT EDUCATION OFFICER (M) SWAT AT GULKADA

OR,

ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION PESHAWAR



GOVERNMENT OF KHYBER PAKITUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT Annexume

Peshawar, dated the 24th July, 2014.

#### NOTIFICATION

<u>No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre</u>:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) -4-5/SSRC/Meeting/2012/Teaching-Cadre,-dated,-13-11-2012, the following-further amendments shall be made, namely:

#### AMENDMENTS

In the Appendix,-

#### Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3			Ą	5	
"1.	Subject Specialist	i.	At least second class Master's Degree or				
	(BPS-17)	·	four years BS Degree in the relevant	t	years .	of seniority-cum-fitness, for the relevant	
			subject; and		-	subject from amongst the Secondary School	
		ii.	Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or	; [	-	Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3.	
	•••		equivalent qualification from a recognized University.			Note: If no suitable candidate is available in the relevant subject the post falling in their promotion auota shall be filled by initial	

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

 $(ii) = a_{\mu\nu}a_{\nu\nu}s$  Serial No. 1B, as so renumbered, for the existing entries, the following Shall be substituted, in respective columns, namely: s

I. At least second class Bachelor 1. Seventy Five per cent by promotion, on the 2110 35 Secondary School "1 B. Teacher (BPS-16) basis of seniority-cum-fitness, from the Degree's from a recognized years. University on need basis from the district concerned in the following manner: following groups with two subject (a) (Chemistry, Botany or Zoology), forty per cent from amongst the Senior (a)' Certified Teachers (BPS-16), with at least <u>\_\_\_\_</u> (b) (Physics, Maths "A" or "B" or Statistics) five years service as Senior Certified Teacher and Certified Teacher and Orhaving qualification mentioned in (c) (Humanities and other equivalent column No.3: groups at degree level with English Provided that if no suitable as compulsory subject; candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion. II. Bachelor of Education or Master of on the basis of seniority-cum-fitness, Education (Industrial Årt or Business Education) or MA from amongst Certified Teachers, with equivalent Education or at least five years service as such and qualifications from a recognized having qualification --- mentioned ---- in University. column No. 3; (b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3: (3)

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

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

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of senioritycum-fitness, from Arabic Teachers with at least five years service as such and having qualification\_mentioned\_\_incolumn No. 3;

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

(4)

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3; (e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3: Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of senioritycum-fitness, from Oaris with at least five years service as such and having qualification mentioned in column No. 3; twenty per cent from amongst the (f) Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3. Provided that if no suitable candidate is available from amongst (5)

Prinning School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority cumfitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3: Provided further that if no suitable

candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

twenty Five percent by initial (ii) recruitment.

Note:

If no suitable candidate is available in Ĭ. the relevant cadre of the above teachers, the post falling in their promotion quota ˈˈshall be filled by initial recruitment.-

Posts of General SST and SSTs-1 Science II. and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."....

(6)

#### SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

#### Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.

The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.

The Secretary to Government of Klyber Pakhtunkhwa, Law Department Peshawar The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.

5. The Accountant General Khyber Pakhtunkhwa Peshawar.

6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.

The Director of Education (FATA) Peshawar

8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.

9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.

10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.

11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.

12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.

13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.

14. All District Account Officer in Khyber Pakhtunkhwa.

15. All Agency Education Officer in FATA

16. All Agency Account Officer in FATA.

17. PS to Governor Khyber Pakhtunkhwa, Peshawar.

18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar. 19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar 20.PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar. 21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.

22.Master file

(ZAMIN KHAN MOMAND SECTION OFFICER (PRIMARY)

Annexave

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JUDGMENT SHEET PESHAWAR HIGH COURT, PESHAWARCOUR (JUDICIAL DEPARTMENT)

COC No. 105-P/2018 in WP No. 35

JUDGMENT.

Date of hearing: 08.11,2018

Petitioner (s): <u>Nipar</u> (<u>Imail</u> <u>D</u>; <u>M</u>? . <u>Noor</u> <u>Mulummad</u> <u>Letakak</u> Respondent (s): <u>Mulummad</u> <u>Dram Letan</u> <u>kap</u>, Gred (<u>Caux</u> <u>Ale</u> <u>WAQAR AHMAD SETH, CJ:-</u> Through this

O

single judgment, we propose to dispose of instant contempt petition as well as connected COC No. 107-P/2018 in WP No. 1662/2010, COC No. |108-P/2018 in WP No. 2967/2009 & COC No. 109-P/2018 in WP No. 3189/2009 because in all the petitions, the petitioners have sought initiation of contempt of court proceedings against the respondents for not implementing the judgment/order dated 26.01.2015.

2. Facts in brief are that the petitioners had filed Writ Petitions before this Court and prayed that the Act No. XVI 2009, namely, 'The North West Province' Employees (Regularization of Services) Act, 2009 dated 24<sup>th</sup> October, 2009' being illegal unlawful, without authority and jurisdiction, based on malafide intentions and being unconstitutional as well as ultra vires to the basic rights as mentioned in the constitution be set-aside and the respondents be directed to fill up the above noted posts after going through the legal and lawful and the normal procedure as prescribed under the prevailing laws instead of using the short cuts for

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ar High Court 3 0 NOV 2018 obliging their own person. They further prayed that the notification No. A-14 / SET (M) dated 11.12.2009 and Notification No. A-17 / SET (5) Contract-Apptt: 2009 dated 11.12.2009, as well as Notification No. SO(G) / ES / 185 / 2009 / SS(Contract) dated 31.05.2010 issued as a result of above noted impugned Act whereby all the private respondents have been regularized may also be set-aside in the light of the above submission, being illegal, unlawful, unconstitutional and against the fundamental rights of the petitioners. The writ petitions came up for hearing and vide judgment/order dated 26.01.2015, the same were disposed of in the following terms:-

"(i) The Act, XVI of 2009, commonly known as (Regularization of Services) Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld. Official respondents are directed to *(ii)* workout the backlog of the promotion quota as per above mentioned example, within 30 days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh recruitments"

3. After passing the above said judgment, the petitioners were quite hopeful regarding their promotion to the next higher grade being senior most employees but the respondents have again started recruitment process by advertising the posts of various cadres for initial recruitment in various Districts of Khyber Pakhtunkhwa and as such, the inaction of respondents squarely fall within the ambit of

Peshawar High Could

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contempt of court and they are liable to be proceeded and punished under the law; hence, the instant petitions.

4. Respondents No. 2 & 3 have filed reply to the show cause and prayed for dismissal of instant petitions.

Arguments heard and record perused.

5.

While deciding writ petition No. 2905/2009, vide judgment dated 26.1.2015 which has been upheld by the apex Court, the respondents-department was directed to workout the backlog of the promotion quota and consider in service employees for promotion against the vacant post, till the backlog is washout. In this respect record is suggestive that the backlog was worked out and by that time 2725 employees ? teachers were in the promotion zone and as such were promoted. Moreover, by virtue of Regularization Act, 2009, Act No. XVI of 2009, 1766 employees / teachers got regularization and as such, when worked out, the promotion quota was fully exhausted. The judgment in this respect was not for all the times to come for promotion purposes. Once the promotion quota, which was given advantage, in view of Regularization Act, 2009, cannot be claimed again and again, By now it's the question of fact that as to whether any employee / teacher was not promoted and by that time when Act 2009 was enforced they were in the promotion zone. Even otherwise, once backlog was worked out and promotion was done then claiming seniority and promotion is the job of service tribunal.

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7. In view of the above, the instant as well as connected contempt petitions are disposed of in terms above. Show cause notice issued to respondents is hereby recalled.

Chief Ju

Judg

<u>ANNOUNCED.</u> Dated: 08.11.2018

CERTIFIED TO BE TRUE COPY

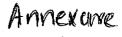
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### OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWAT AT GULKADA

#### PHONE/FAX 9240228 E-Mail deomswat@gmail.com www.male.sed.edu.pk

#### **NOTIFICATON**

Consequent upon the Notification issued by the Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide his office Endst: No 681-85/File No.1//Promotion SST (B-16) Dated Peshawar the 05-02-2020. The following SSTs (whose services were placed at the disposal of DEO (M) Swat for further adjustment) are hereby adjusted against the post in the schools noted against each in the interest of public service under the existing policy of the Provincial Government on, the terms and conditions given in the afore mentioned notification of the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar with immediate effect. SST(MATHS & PHYSICS)

S: #	Name	Present School	School Where	Remarks
7			adjusted	
)1	MR.FAŻAL SUBHAN C.T	GHSS MINGORA SWAT	GHS MANAI SWAT	AGAINST VACANT POST
)2	MR.IFTIKHAR C.T	 GHSS NO 3 MINGORA 	GHSS NO 3 MINGORA SWAT	AGAINST VACANT POST
)3	MR.ANWAR KHALIQ .SPST	GPS SAMSARAY SWAT	GMS DADAHARA SWAT	AGAINST VACANT POST
04	MR ABDUL QADOOS SPST	GPSDELAY SWAT	GHS QANDIL SWAT	AGAINST VACANT POST
	(GENERAL)			
S:#	Name	Present School	School Where adjusted	Remarks
1	MR ADIL JAN SCT	GHS SERSENAI	GHS SHAH DEHRAI	AGAINST VACANT POST
2	MR.MUHAMMAD ALAM SCT	GHS ASALA	GHS ASALA SWAT	AGAINST VACANT POST
3	MR.SAMIULLAH SCT	GHS NOI MINGORA	GHS NAWAKALY (M)	AGAINST VACANT POST
4	MR.ANWAR IQBAL SCT	GHS AMANKOT	GHS AMANKOT SWAT	AGAINST VACANT POST
5	MR.MUKARAM KHAN SCT	GCMHSS WADOODIA	GCMHSS WADUDIA SWAT	AGAINST VACANT POST
6	MR.FAZAL RAHMAN SCT	GHS TOTANO BANDAI	GHS TOTANO BANDAI	AGAINST VACANT POST
7	MR.MUHAMMAD LAIQ SCT	GHS MATTA	GHSS BAMAKHELA	AGAINST VACANT POST
8	MR.GUL MUHAMMAD SHAH	GHS SWEEGALAI	GMS MALOOCH SWAT	AGAINST VACANT POST
9	MR ALAMGIR SCT	GHS UDIGRAM	GHS UDIGRAM SWAT	AGAINST VACANT POST
.10	MR.FAZAL AZIM	GHSS KHWAZAKHELA	GHSS BATAI KHWAZAKHELA	AGAINST VACANT POST
	MR.UMAR ZADA SDM	GHS NO 4 MINGORA	GHSS CHARBAGH	AGAINST VACANT POST
12	MR FAZAL AZIM AT	GHS DURUSHKHELA	GHS DURUSHKHELA	AGAINST VACANT POST

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# BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1239/2019

Naseer Hassan CT (BPS-15) GHS Qandil, District Swat ......Appellant.

#### VERSUS

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

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

Respectfully Sheweth :-

The Respondents submit as under:-

#### PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal.
- 4 That the instant service appeal is based on mala fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the instant Service Appeal is against the prevailing law & rules.
- 7 That the Appellant has been treated as per law, rules & policy.
- 8 That the appeal is not maintainable in its present form.
- 9 That the appeal is bad for miss-joinder & non-joinder of the necessary parties.

10 That the instant Service Appeal is barred by law.

11 That the Appellant is not competent to file the instant appeal against the respondents.

 $(\mathcal{A})$ 

- 12 That the Notification-dated 24/10/2009 is legally competent & is not applicable of the appellant to the extant of promotion along with the grant of all back service benefits under the rules.
- 13 That the appellant has correctly been promoted against the SST BPS-16 post in view of the rules, criteria & policy by the Respondent Department.

#### **ON FACTS**

- 1 That Para-1, needs no comments, being pertains to the service records of the appellant relating to the appointed vide order dated 22/11/1986 as PST & vide an other order dated 01/06/1991 against the AT post in the Respondent Department.
- 2 That Para-2 is correct to the extent that the Respondent Department has advertised SST B-16 post in the National press on adhoc / contract basis for only for fresh candidates by barring the in service Teachers in the Respondent Department for initial period one year as per policy of the govt. (Copy of the advertisement is annexed as Annexure-A).
- 3 That Para-3 is incorrect & not admitted on the grounds that the appellant was appointed against the SST BPS-16 post on adhoc/contract base in view of the terms & conditions in the advertisement for the said post & cannot claim regularization wef 24/10/2009 against the SST Post in the Respondent Department. Therefore, the claim of the appellant is baseless & liable to be rejected (Copy of the Act of 2009 is Annexure-B).
  - That Para-4 is correct. The factum of the applying for the SST post on Adhoc/contract basis cannot be accrued any legal rights for the grant of seniority-& other-allied-service-benefits-against-the-SST B-16-post to the appellant. As it can only be allowed to a candidate for the SST post on adhoc/contact basis appointed by the Respondent Department in view of the terms & conditions.
- 5 That Para-5 is correct that the services of the adhoc/contract SSTs in B-16 were regularized under the Regularization services Act of 2009 by the Respondent Department & a copy of the said Act of 2009 is already attached as Ann-B for ready reference.

That Para-6 is correct to the extent of filling of writ petition No.2905/2009 under title Atta Ullah etc VS The Chief Secretary Govt. of KPK & others before the Honorable Peshawar high Court Peshawar which was decided on 26/01/2015 with the direction to the Respondent Department—as under:-----

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The Act.XVI of 2009, commonly known as (Regularization of service Act, 2009 is held as beneficial & remedial legislation to which no interference is advisable, hence, up held.

- ii. Official Respondents are directed to work out the backlog of the promotion quota as per above mentioned example, within thirty days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh recruit.(copy of judgment is Ann-C).
- 7 That the Para-7 is correct. That vide judgment 20/09/2017, the august Supreme-Court of Pakistan dismissed CPs No.127-129/P/2015 case titled the Chief Secretary Govt.of KPK etc VS Atta Ullah & others in favor of the Respondent Department.(copies of the judgment, & applications for the appointments against the SSTs B-16 post through NTS are attached as Ann-D,E,F,G & H).
- 8 That Para-8, is correct that the appellant has been promoted to the post of SST B-16 vide notification dated 14/03/2012 with immediate effect rather than with retrospective effect in view of the APT rules 1989 from SCT to SST B-16 post in the Respondent Department on the basis of reserved quota for promotion under the relevant criteria/policy dated 13/12/2011 of the Respondent Department (Copy of the said policy is Ann-I).
- 9 That para-9 is correct that COC No.105-P/2018 in the above said WP No.2905/2009 Atta Ullah etc VS Govt. of KPK & others has been dismissed vide order dated 08/11/2018 on the grounds of jurisdiction by the Honorable Peshawar High Court Peshawar (copy of the order dated 08/11/2018 is Ann-J).
- 10 The para-10 is legal. However, the Respondents further submits on the following grounds inter alia:-

#### ON GROUNDS

6

i.

A <u>Incorrect & not admitted.</u> The stand of the appellant is without any cogent reason & legal justification & liable to be rejected as the act of the Respondent Department with in legal parameter & liable to be maintained.

**Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification & liable to be rejected as the act of the Respondent Department with regard to the non-grant of promotion wef 24/10/2009 against the SST B-16 post is within legal sphere having no question of violating the mandatory provision of Articles-4 & 25 of the constitution of Islamic Republic of Pakistan 1973.

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**Incorrect & not admitted.** The act of the Respondent Department with regard to the non-grant of promotion wef 24/10/2009 against the SST B-16 post is within legal sphere is in accordance with law & rules. Therefore, the plea of the appellant is liable to be rejected.

**Incorrect & not admitted.** The plea of the appellant is baseless as the act of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.

E **Incorrect & not admitted.** The plea of the appellant is baseless as the act of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.

**Incorrect & not admitted.** The plea of the appellant is baseless as the act of the Respondent Department is legally competent & liable to be maintained having no question of violating the provision of S-9 of civil servants Act r/w Rules-7 of the APT Rules-1989.

Incorrect & not admitted. The plea of the appellant is baseless as the act of the Respondent Department is legally competent & liable to be maintained as he is not entitled for the grant of consequential benefits including seniority wef 24/10/2009 against the SST B-16 post in the Respondent Department.

**Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification & liable to be rejected as the act of the Respondent Department with regard to the non-grant of promotion wef 24/10/2009 against the SST B-16 post is within legal sphere having no question of violating the mandatory provision of Article 38(e) of the constitution of Islamic Republic of Pakistan 1973.

**Legal.** However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed. that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated /2020

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

Director

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

#### AFFIDAVIT

I, <u>Hayat Khan Asstt: Director (Litigation-II)</u> E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.

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Deponent

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ل است مسلم وی است که این استواد می تونید شود. از است ۵ (۱۹۹۵) و ۲۹۹۸ و ۲۹۹۷ و ۲۱ - ۲۰ معمار و ۱۹ می از ۲۰ معاد این است مرد دی است که این استواد می تونید شود. از است از این که برای مرد این می تونید این است مرد این می تونید ا به این این از این از مرد این مسلم این می این این این این این این این مرد این می تونید این این می تونید این این م	Srate Andara	27- 187 S.S.M. + 37 20	وی و میشود اور	tiveston estation, Longold	د. مارید از ۱۹۹۰ میکویی میکوی میکوی میکوی میکوی	lian er dant-	and the second states a
نما این اور حس ما نویس می ایسل میسی اور کمیه و طوما از میت کم با تعلیم ومات اور دست بی اینات جال کم ریز کمیلیم لبت سه اور می کند کم مشکل که از واجع ندامید واموس با میانات با مینانا سیلیا و عباسه مار کند 100 می دورد دورد می مراکب این از مارم مرکب وقت انتال کانا کو دستی کمی که مسل مات کا امیزا سوار اور که دورد و با مارد وکند. مراکب سوا	1.0.1				•		
وی که این از این از این است میک مان کود مین به جدهای سومایی کام مرا سداری در مارسد و بدود به مارسد و از از مالیک می لیج از ساد میں اوالد از مدارا اوالم از این تاریخ می کوئی مالس مولا مساف میک از مالی در دارست. مالم اظراف می الی کم با یه مرام میک مسل 13 المست 2007 مرکودیب مالیت mwrfp.com، معدمه، بر زالی س	· م ک				et	••	•
د مرسمان می بود به این این می که این می که است 2001 مرد می ماند. در مرسمان ماند ماند بادی کن شیر ماند می شداند این مرد مارد مارد مارد می ماند ادران کم ایند کم مدینه مکن به داد در مرسمان می که مالادی ایر کارش شیر سرمه والی استامه و مرد محکوم ماند و کم مانو این که استار از این که 2000 قسما	<u>רן אַיטיא</u>			• •	· · · ·		
الم على 1 الم من 1 الم الم الم عام 1 مع الم عام 1 مع الم عام 1 مع الم على الم على الم عام 1 مع الم على الم عام الم على 1 مع الم	ا بغرير		•			• •	
.2007 - 121 .2007 - 119 (SST)		· .		, · -	*		
يد فارم او معاديت على ون شده المام لولكا المرارم مسر المندو ولك - اميد الدام من عديت والفان المدين الا ويت	درنو است				· ,		÷
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Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

4A. <u>Overriding effect</u>.—Notwithstanding any thing to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

5. <u>Repeal.</u>---The North-West Frontier Province Employees (Regularization of Services) Ordinance, 2009 (N.-W.F.P. Ordinance No. VII of 2009) is hereby repealed.

regularized under the Act in question be calculated in that cadre and equal number i.e remaining 50 % are to promoted from amongst the eligible in service employees, other wise, eligible for promotion on the basis of sonority cum fitness."

19- In view of the above, this writ petition is disposed of in

the following terms:-

 (i) "The Act, XVI of 2009, commonly known as (Regularization Of Services)
 Act, 2009 is held as beneficial and remedial legislation, to which no interference is advisable hence, upheld.

(ii) 👘 Official respondents are directed of the backlog workout the to promotion quota above as per mentioned example, within 30 days and consider the in service employees, till the backlog is washed out, till then there would be complete ban on fresh

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CERTIFIED TO BE THUS COPY

Examiner. III Peshawar Lingh Court Pesha

order accordingly.

Announced. 26<sup>th</sup> January 2015

## IN THE SUPREME COURT OF PAKISTAN (APPELLATE JURISDICTION)

PRESENT:

AVA

MR. JUSTICE EJAZ AFZAL KHAN. MR. JUSTICE SH. AZMAT SAEED. MR. JUSTICE HAZ UL AHSAN

CIVIL PETITIONS NO. 127-P TO 129-P OF 2015. Against the judgment dated 26.1.20,15 of the Peshawar High Court, Peshawar passed in With Petition No.2905 of 2009, 3-L5 of 2009, 64.4 2019

The Chief Secretary, Govt. of KPK., Peshawar and others. ... Petitioner(s)

i Versus	, ÷	1			(in all cases)
Attauliah and others	·	· ·	.'		
Nasruminuliah and others.			·		• . •
Mukhlar Ahmdd ond olhers.	ал. 1		· •	.Res	pondent(s)

For the petitioner(s) - Mr. Mujohid Ali Khon, Addl. A.G. KPK

For the respondent(s): Date of Hearing:

Mr. Ghulam Nabi Khan, ASC Mr. Abdul Qayyum Sawar, AOR 20.09.2017.

<u>ORDER</u>

Elaz Alzal Khan, J.- The learned Additional Advocate General

appearing on behalf of the Govt. of KPK stated at the bar that as per Instructions of the Government he does not press these petitions. Dismissed

as such.

SUPREME JE. 0 URT SEAU  $\mathcal{O}_{\mathcal{T}}$ 55 ų NR 20.09.20 har Mai ١٩ A

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Sd/-Ejaz Afzal Khan,J Sd/-Sh. Azmat Saeed, J Sd/-Ijaz ul Ahsan, J Certified to be True Copy.

CourtiAssociate Supreme Court of Pakistan

/ Islamabad

2 Givil/Criminal GR No: Date of Presentation: No of Word. -1 -a.H. No of Failer 25  $\mathcal{A}$ Requisition F 200 'Copy Fee in: 9 Court Fee S Date of Co-Date of delive - UUV: | Compared by/Prepared by:. Received by: .....

IN THE S	UPREME COURT OF PAKISTAN	1
(	APPELLATE JURISDICTION	-

PRESENT MR. JUSTICE EJAZ AFZAL KHAN. MR. JUSTICE SH. AZMAT SAEED MR. JUSTICE IJAZ UL AHSAN.

CIVIL PETITIONS NO. 127-P TO 129-P OF 2015. Against the Judgment dated 26.1.20.15 of the Peshawar High Court, Peshawar passed in With Petition No. 2905 of 2009: , 3 - L5 - F 2-19, 664 / 2-19

The Chief Secretary, Govit. of KPK., Peshawar and others. ....Petitioner(s) (in all cases)

Attaullah and others. Nasruminullah and others. Mukhtar Ahmad and others. ...Respondent(s)

For the petitioner(s): Mr. Mujahid Ali Khan, Addl. A.G.-KPK For the respondent(s): Mr. Ghulam Nabi Khan, ASC

Date of Hearing:

os such.

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07,20

SUPREME

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SEAJ

Mr. Abdul Qayyum Sarwar, AOR 20.09.2017

<u>ORDER</u>.

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Court Associate Supreme Court of Pakistan Islamabad

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•.		. مانست	A DESCRIPTION OF TAXABLE PARTY.	A		

الليسترين وي الميسترين وي	ز رادروا کمز زریکولینری ایک 2011 میں سیکشن نسبر کائے تحت تک	به میکند. په میکن ، پوسنینگ اور فرانسفر آف بیچرز کیکچررز ، انستر کنم	ا تيبر، يختونخو البوالمنمنيك ، وي د	F-
	بر پختونخوا کے متعلقہ اصلام کے سکونتی اہل امید داروں ہے تجوز : فار	ولوں بنی درجہ ذیل آسامیاں پڑ کرنے کے لئے جیم	فرز برانتظام (مردانه زمانه) سک	پختو مخوات : ستد
ورنواستون پر نورتین کیا در بی اردنواستون پر نورتین کیا در بی	ا) پردستیاب بے سترردہ مربع گزرنے کے بعد مبلسول ، دینے دان	ttp://www.nts.pk) ひいいい (NT	ملاوب <u>میں برا بر در حوا</u> ست فارم (S	
<i>k</i> i	and a second	تابيت	ام آسامی -	
1.35=24	یژن بینلرو کمری جس کے ساتھ در من کلی دومضاعین اور کن دولہا۔ میں	SST) ایس محمق تقلیم شده و بو نور منی سے سیکند والو مستقد میں اور مار میں مرد اور میں مارور میں میں مارور م	ایکنڈری سکول ٹیچرم ( ماہمار جہ ایک میں میں میں میں	1
	) میمانستانیج کیشن یاایجوکیش میں یکیلر ڈکری۔	(۱) میستری میانوری ( دوالو بی یا بانی (۱) - سمستری میانوری ( دوالو بی یا بانی (۱) - سری بی میسترخد و موضوع به ساز	المياري/ميشري BPS, 16	
JU-35721	ویژن ییمرد گردی جس کے ساتھ در اُنج ذیل دومندایین از می جون ۔	SS) (1) کسی محمد منام خبد و بندر من سے سیکنڈ دو	سیکنڈری سکول نیچر ( T فز <i>س اینغس</i>	2
	س میکنس B یا۔ (iii)۔فزنس ، بیفنگس ۲۱۔ ایج کیشن یا ایجو کیشن میں بیلرو گری۔	· (2)-، كى بحى جمليم خد ديد ندر في ستان	BPS. 16	+
JU35721	یون پیچگر فکر بی جس سے ساتھ در بناؤیل دومضامین لازنی ہون ۔۔ سادی گروہ یہ ۔ سادی گروہ یہ ۔	جزل (1) کمی می کناییم مورد دیو نیزری سے سیکنڈزور (۱) - انگریزی ۱۱ زی، ہوستیز گروپ یادیگر۔	سیکنڈری سکول فیچر (SST) BPS. 16	
	ا الجويمشن باالجويمشن شن يجفر و تُرى .			J
	ى ب <sup>2</sup> لى 200 نمبرات كى تتسيم ان طرح	لميكشن كريغريا المماتة وتستنكش كيلح كريز وادرمة زيرا		
	(ب) يتليى قابليت = 100 نبر جس كى مزيد تعسيم اي طرب بوكى	بنیت بذریعہ NTS= 100 نمبر	( ۱) پستر مُنْلُه	
	ا گل نیر	کی تابلیت		
	مانس کرددنسر 20x تقتیم کل نیر	رائیس ی	<u>, <u>,</u></u>	
			÷ 10	ļ

	جامل کرد ونسبر 20x تقسیم کل نیسر		الليف أي / الليف التي ي
	ماللس کرد ونسبر 20 تختیم کل نمبر		لاست / نامان
<u></u>		n no the designed in the second of the	and a second and a second second of the second s
	حاصل کرد دنمبر 15x تقسیم بخل نبر		لياليه / الجواب الجو كيش
	چاصل کرد دنیسز 05x تقسیم کل نیسر		الجمالي / الجراب الجويش
	حاصل کرد دنیبر 05x تکتیم کل نیبر		し ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) (
•	3.01= 00x7.550 T		المالي بالبلاكية كعن عرفي كقتر المرج برابر والمتحتية

نالین چار ساله کوری کی سورت میں نمردن کی تقسیم س المرت ہوگی۔ حاصل کردونیز 35x تقسیم کی نیز دجک پیڈوران ایج اے بچوکیشن کی صورت میں تیر کی تقسیم الفریقہ از بل ہوگی۔ ایم اے ایج کمشن حاصل کردونی کمیں تقسیم کی نبر

فوت: (1) ہو سکول کی آسامی کے لئے دوشیدہ میر شد مست مرت کی جا لیکن جس میں اس داردن کے NTS سے ماصل کر دونیم (اور هلی قابلت سے نیم دن کوئن کیا جائیکا۔ (2) ہوار ہے NTS ندر اور سے

نادم 300 وب چارج کیاجائے گا۔ اگرایک اسیددار 5 سکولوں کے لئے در تواست دیکاتو اس سے 800 دو بے بق NTS چارج کریتے جو کہ اسید دارخود برداشت کریں تے۔

(3) . NTS شت ش 40 نسب برلیناخر، درناب - 40 نسب من منبع عال الميدوارة المي تقور، وكا اور مرت است ش مثال فترى، وكا-

مدین و من این این این از این - (1) حمام آمتر ریان مکومت قسیر پختونتون کنیم میترونین کے مطابق بنیادی تقریر کی Ihitial Appoinmenl کے 25 یامد

کرنے کے قت خالعتا مارمی بیادوں پر Adhoo محریک پرایک حال کے لئے ہول کی۔ (2) معذود افراد کے لئے دیک مدور دولت کے تین فیسد کو دیکس ہے۔ (3) انٹرد بی کے دات اس تعلین مندود بر ایک مدور ایک مدور افراد میں کی اور است کر ایک مدور افراد کر کی تی است مدور اور کرکی تی است مدور کرد مدور کرکی تی است مدور اور کرکی تی است مدور اور کرکی تی مدور اور کرک تی تعدید مدور کرد کرد مدور کرد کرد کرد مدور کرد مدور کرد مدور کرد مدور کرد مدور کرد کرد مدور کرد م

حصه والبلق حلبك أذابريكتم المليميتوي الندسيكنيزي الحديكيتية والحريدة والمراجع

	میں دور دستان یا اس کور من ارباند) سودوں میں دوجد کی آشامیاں پر کرنے کے لیے خیر محتو محود کی تسلید اندان کا میڈوارد کی اس کور و قارم مردو سیک درخواتیں مطلوب میں - درخواست فارم (NTS) کی دیب سائٹ (http://www.nts.org.pk) پر دستیاب ہے ۔مقررہ نادی کرزنے سے ا		استوں پر فود میں ا
· · · · ·	المبت	Shipt	برثار
1-35519	ا) کسی بحی تسلیم شده یو نیورش سے سیند ڈویژن بیلر ڈکری جس کے ساتھ درن ذیل دومضا مین لازمی ہوں ۔(۱) کیم سٹری، میالویتی (زوالویتی یا پانتی) ::::::::::::::::::::::::::::::::::::	دی کول میچر (SST) بیانوچی / ((	1 22
	ii) سلیش ارد تر ربی بعد وماد کی لازی ثرینگ حکومتی ادارد ب RITE/PITE سے حاصل کرنی ہوگ۔	)	
1. 16510	i) کی بحی تنگیم شدہ بوغور کی سے سیکنڈ ڈویژن تکپلر ڈکری جس کے سیا تھو درج ڈیل دد مذاعن لاڑی ہوں۔ (i) فزنس میتحس A یا (ii) فزنس میتحس B یا (iii) سر بیلیک	)  / / / (551) / ()/	2 المبيكية
L35t19	رس، اعکس زیر، اعکس		44.20
	الا بسقيش اورتقر وى مح بعد وماه كالازى فريشك مكوتى ادارو بRITE/PITE ب ما مل كرنى موك -	· · · ·	
	<u>الم من /u>	ندُرى سكول معجر (SST) جزل (	<u>۲</u> 3
L 351 19	i) کی مح شلیم شده بونورش سے بینداد بران بیلر ڈکری جس کے ساتھ درج ذیل دد مضاحین لازی ہوں۔(i) انجریزی لازی ، ہومینطیز کردپ یا دیگر سادی کردپ۔ ۱۱۱ سلیک بد آنہ بربری در در بربری میں میں		
	۱۱) سليش اورتقر ري سح بعد وماه كالازى فرينك مكوتى ادارون RITE/PITE - مامل كرتى موك -	<u>با: اساتدة کر سایکٹن کا و</u>	یکشن کرتڈیز
	کریٹیریا درج ذیل ھے ۔ کل 200 نمبرات کی تقسیم اس طرح سے کی جائیگی ۔ اس میں اور یا درج ذیل ھے ۔ کل 200 نمبرات کی تقسیم اس طرح سے کی جائیگی ۔		() سکر جنگ جم
متسم ك نبر بجلاً	۔ وی سے معالی محد معبول می معلیم اس مدرج مع می مح جالیکی ۔ .) الحکوما بلیت = 100 نمبر جرب کار محد معرف محد مع جالیک جار سالہ کورس کی مورت میں قبر روں کا تشیم اس طرح ہوگ ۔ مامل کردہ قمبر 40 ت	-) / ! 100-11152.2.	
			هكماتليت
)			
		مامل كرد فبر x0x تعييك فبر	اليماليمي
ايوں کے TS	ر [] (-) -) -) ایمانی [] ماس کرده مبر 20 مسیم ( این [] مسیم ( این است ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰ ۲۰		لات المالي
ولمسر لدتامتين	ر ايماليراام اسايويش مال كرده نبر x50 تتسيك بر المحمال ود برادر طبك الميت كفرون كدم كما جايك-(NTS(2) عيد عن 40 في	مامل كرد فبر x 05 تتسيم كل فبر	بال 1
	- 10 يس من ال الم من ال الى من ال	ی مامل کردونیر x12 تقسیم کل نب	ايم قل بي الجحود

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# در خواستایی مطلوب هپ

بخونو الایمنت از بویش نوستگ اورز خسفر تم از لیم در نامنز کن زادر با کن زریم کیش کا 2011 سیکشن نیم 4 سیمتر می ایند سیندری ایجویکش خیر از تونوا سه خلام (مردان از تان) سکون کرش درجه زیل آگرامیان پر کرنے کمیلاً خیبر پختونو سیمت امادی سیمترین می 4 سیمترین کا بل ب تین از قدامت قارم (NTS) کی دیب سامن (http://www.nts.org.pk/) پردستیاب به مقرر دیگرز نے میں بعد موسول دون دالی در نواستوں پر فور نیس بائیک

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·	ا کانے	ی مبانی	11
	انس بمی تشکیم وبو غدرتی بید شد و ویژن بیلی ترکن جس کے ساتھ درت ویل دومضایت لازنی ہوں ۔ اس کم بید بیدا میں جب المبلی المبلی کے ساتھ درت ویل دومضایت لازنی ہوں ۔	سَنْدَرِ بِي سَلُول عَمْرِ SST يَدْ مِنْ	
:21	ا ای محافظ ما مادی مدر کاملے چیکر اور کا کا چرد کرتی جن کے سام ورز یا دیں دوستما میں لازنی ہوں ۔ [) کیسٹرنی ایوانونی (ذوالو زندیا بائن)	· · · · · · · · · · · · · · · · · · ·	
ل-35	یفا کمن مجمل شند و بر ندرش ستا بیم اے ایم نیشن باایم کیش می چلز در ز	l	
	() مج بم مكرية بدو من محترف <u>معالم بالا من من المحترف ا</u>	يكندن سُول نجر SST	
<b></b> 21	۲۷ ما مل میامیداد بیدون کے سلسمہ ڈورکن تیجر زکرن جس کے ساتھ درمانو کی دوستا میں ایا زلی ہوں۔ ۱۱ زمن میں مس A یا (۵) فرنس کی مس B یا (۱۱) نوٹس استاس مارکس سر در ا		
35 مال	م کل کل سیم تعدایج بندرک بینا ایم این ایم کیش م علن تر :		_ <u> </u>
	) کمی جمعی حکیم شد دیج نیورنی سے شیند ذوریش بیش و کرنی جس کے مساحد درمنا دیل دومضا میں لاریں ہوں۔ او کم بدند بدون نہ صلحہ کر سے بالہ میں سالم اور کرنی جس کے مساحمہ درمنا دیل دومضا میں لاریں ہوں۔	سَيْنَدْ، بْ سُوَلْ بْحَهْ, SST	
:21	)التمريز ن لازنی بوصیح کردپ یادع مسادن کردپ (2) سی بحکی صدر کادی (مصله منالار بی دون پرکیش مرابط دی از این المجار سادن کردب (2) سی بحکی تشغیم شدوع غدر منی سے ایم اے الجو کیشن یا	1 BPS.16リス	
35 مال			,
	ید کار می بارد مرن با بین افک 200 نیزات کی مسیم ان طرب کی جائے تی ۔	إساما مروت سيكنن كريسريادرن ذكر	فن لريين
	(ب) تعليم <del>6</del> بلية = 100 نبر جس كابل مرين بركي - (ب) تعليم <del>6</del> بلية = 100 نبر جس كابل يرتسم إن طرن بركي -	میسه مرجع CIN ۳۵ 100 مبر	سريق
		مسمل کابلیت	
		السابين	
	مامل کرد ولمبر 20x تکتیم می لبر ما	النيساب البيس المين	
	مَنْ كَ كَرُدُو مُرْ 20 سَمِينَ كَمْ مَرْ	ن ناب ان اعرى	
	ما معلی کرد د نبور 20x تقسیم کل نبور	ایم! بیم! ب ایم! نیس ی	
	ماسل گرد انسر 15 مشیر می مسر	ن <sup>د</sup> ا مرا ایم استا بجولیش	
	ما ک <sup>1</sup> /15 مسیم قل مسر	الم الغ (اليم الما الموليش المرابغ (اليم المه الموليش	
	مامن کرد و نیس XB تتسیح کی نیس	الم من الم من الم من الم من الم الم من الم	
		ا کی میں یہ مولمیں کر مشرور کا	. ما د ما
	ما محل کرد و بسر x5 متیم کی نبر دبکه چنا درندانیم اے ایج کیشن کی سور کے میں نبر کی تشییم جگرایتہ فریں او کی۔ ما دو کی مدامل کرد و نبسر x5x متیم کی نبسر دبکہ چنا درندانیم اے ایج کیشن کی سور کے میں نبر کی تشییم جگرایتہ فریل	ل کا جودت شرا بروی کا ایم اس هر. سل کر: دنبر 20x متیم کل نبر بید.	یا کی نیس کا میں ا را کا کیشن را
- (2 6	مرتب کی جائیتی جس میں امیہ داروں کے NTS نے حاصل کر دونمبر اور تعلیمی کا بلیت نے نبر وں کو بس کیا جائے ؟ کراہا نے کو اگرا کی باہر روں ایج سکہ در سر ان ہے :	ما ممان بیت به دور بخدوم بند کن افسانی است به دوره	NTS- A
. 6 / č.	کر جب کا بع ملک من من اخیدادادوں نے NTS نے دامل کردو ممبرا اور ملسک قابلیت کے نبیروں کو جن کیا جائے ؟ کیا جائے کا اگرا کی امید دام پانچ سکوں نے لئے درخوارت دے کا تو اس سے سرف 800 دو پ ی NTS میار	الناء کو موجعت علوم کالک دو ہے جارت مت کریں ہے۔	م وار شور و با م وار شور و با
		مت میں ہے۔ ابط پر ان ماہ پر کا انج	<u>مومہ رہے</u>
عبيا يدمنني	بر پختونخ الے مرد بیقوامی نے مطابق بنیاد نی تقرر رقی Initial Appoinment کے 25 نیسد کونے کے تحت مالا ) معذورافران کیلئے دونیسیہ اوراطبیہ اور داریا ہے لائے توریف کی مختصہ مدینہ میں مسلمہ میں اور ایتا	را 🏎 - ۱۰۰) کما مجفر ریان میدمن خ محتری - ۱۰ کار مالی کار با محتر	
	روس و المبل (مجبروسین کے ملکان میلادی عکر رقی اعظر رقی (Initial Appoinment) کے 25 فیصد کو نے تحقیق مالا ) معذور افراد کیلئے دو فیصد امور القلبة اسیدواروں کے لئے تعن فیصد موضح من سے (3) انتروع کے وقت اسلی تعلین از مالا الارسیان کی کہ ا	- منظر من برایک سران کیلیے ہوئی کی2 اور مریک پر ایک سران کیلیے ہوئی کی2	
مسرور معمد فداسته،	\ معادر الراب و ویسمه البراطیت اسید دارون کے لیے من فیسه کونہ معل ہے (3) انتروع کے دقت السل تعلیمی نے دالے اسید دارون کو کونی کی اے ذیق الے بندی دیا جائے کا 5) مرف مقرر وافلت کے اندر موسول ہوئے دانی در اسر بعض برجمہ برت کی بید دیا جات ہے ہے ا	است کرم :ون کے و کرم انترونج کیلئے آ سخط رو ہے معالمہ کر ہے ہ	ال المي مرد بين بالماني (B) (C)
يو نيون سريون	ے دانے اسے المیدالدون فولون کی اے ذی اے شراع جنگ دیا جائے کا کا کسرف مقرر وافلت کے اندر موسول ہونے دانی در اسے بغیر ک بھی دفت کی یا در ان طور پرانٹرو پر منسوں تر درے۔ 7) یا کران اشتبار کے بعد مقومت دفت کی طرف۔ پاکرنے کی باید روگ 8) عکر اینچرس نہ پر زی کہ اس پر ترض سے ۔ موال سے مراجب ہے	<sup>ر</sup> ک واقعها رماسی میداد و ف وب ما کرد به سکناه سمز	1 X.
ستیدیون به کم	سے بسمہ کن بن دعت کی یا ہزائی طور پرانٹرو موسون ترد ہے۔ 7) انہمان واقشتیار کے بعد مکومت دقت کی طرف . پاکر نے کی پابنہ ہوئی 8) انگر ایلیم عراف اینہ سیکٹر ربی دیم نیٹن کوامت ارمام کی دوگا کہ وہ دیمام مالی آ سامیں پا پر شرو کو دیو انہ ایک زرط سرم سرم سرم بریا میں زاد ہند ۔ سرم سرم سرم سرم بریک ۔ وہ تمام مالی آ سامیں پا اس	ی <sup>6</sup> ک <sup>ارو</sup> سطحن سطح آن کے مطابق مل <sub>ج</sub> است ایک میں ایک میں ایک میں میں میں	ار بی از مر بهر م ماد کرد ک
ے ہر برجنہ	۵۷ سے کی بعد اور 80 سفر السلفر کی اینڈ سطنڈ رق ایج میشن کوا قتبار ماسل :وکا کہ ودتیام مالی 5 سامیوں یا اس «مترر کرد دنوا من دلجوز دخریقہ کارے معارق ماالستا میرے کی بتیاد پر ہوں کی 10 ) قیام تعلیمی اساد صرف کور کرنے ، ساد بیلی 1 سام محتود سے زندنہ سے زند ہے ہو ڈی	کا مما ملکم ریان ملومت خیس بحقو کلوا ہے۔ پا	92279. 3346
	<sup>یسر رو دو دو این ایجز دهر میشد کار کے معارف خالفتا میرے کی بنیاد پر ہوں گی 10 ) قہام تعلیمی اساد صرف کورنسنے ناد جعل پائے کیے تو اس کے خلاف قانونی جارہ جو کی کی مائے کی امہر آئے تد دیکے لئے اسے سرکار کی ملا زمت کے لئے اور خوابر = قدر موفود بخی دمنیہ بڑ قانہ کار ہے اور موجر سے ایک کی دینہ جہ یہ جب سے</sup>	ب <sup>ل</sup> بول ن 11) الرسمي اميذدار کي ا. استرا	الم معنی کی جنس کار ایک از مرکز مرکز مرکز
ک مانهن ۱۰۰۱	<sup>سادس</sup> کا پائے سطح وال کے مطاف قامونی جارہ جوٹی ٹی جائے گی اور آئٹر دیکے لیتے است سرکار کی ماد زمت کے لیے مادر خوامت قارم خود بخو دستور نا تصور کیا جائے کا جس کے لیتے کوئی ایپل مظہور نہیں کی جائے گی 13 ) اند دیچ کیے سے 14) ازارت اور میں جاری در اور سر در سائر کر در	ا می مکن فارم یا معلومات می صورت میر بر در	(12) * <u></u>
بجانت	) <sup>دو ہور</sup> ت مربع موجود جو دسمور کیا جائے کا جس کے لئے کون الیل منظور کمیں کی جائے گی 13 ) اند <sub>ویج ک</sub> یا ۱۰- 14) قمام تقرر بیان متعنقہ ابتلاث کے ذومیان کی نمیاد پر ہوں کی -15 )امید دارکوای سکول متر سرون تر ماہو کہ دیالہ قامان کہ کملیوں خدار ہے دست سی	ہ - <sup>ب</sup> س میں ذاکوشنس جیک کیے جائمتے سر	ل باری میا بات
ل <u>جو</u> که رسم	- ۱۹۷۹ تمام عمر، یک منطقه الملامات نی د میسان کی نمیاد پر بول کی - 15 )امید دارگوای سول متر سر دس کر ) بودگر دمانی آسمامی کیلیے در نواست د ب مکما ہے۔ اسیدون کی ایک یا ایک ستانہ یاد واسکون میں سلیکشن کی صورت متک شن کامتری قدار مدارک اصل نسور کی جہ مصرف میں میں میں میں باری کی ستانہ بلا	)ایک امیرا <sup>د</sup> ، بېک اقت5 سواد کمی	ب تبور برو . 16.
J. J	، مان اسمامین کیلیے دونواست دے سکتا ہے۔ اسیدون کے ایک یا ایک ست یاد وہ سکونوں میں سلیکش کی صورت میں ا شن کا ہتھاتی اسیدار دو عامل نیس بلکہ اس میں ان بات کا خیال رکھا جائے گالی دہم ہے سکونوں میں ان کے بعد میں بے کو طریقہ کار NTS سرید بیا کہ دیرو دیست کا خیال رکھا جائے کالی دہم ہے سکونوں میں اس کے بعد	یا نی جائے کی <sup>و</sup> ٹ مسور کیو میں سکول سلیکے لیمو	ی قرامیت سنول مر مرمد
رز <u>ا</u> دد م	<sup>19</sup> 1 محقاق امیدار دوماس جنگ بلندان شمان بات کا خیال رکما جائے دہرے سکودی متر ان کے بعد 2 اینے کا طریقہ کار NTS کے دیب سائٹ پرمودود ہے، 18 ) متعلقہ اسلام کے خالی آ سامیں کی تسمیل سکور دیہ سکتی محکق محکم میں کا خاص	میشن کو مو <b>ن می شند . 17 )</b> در خوار موجع با الاست الا معام با مستر .	ب دامت اسمیر دارنو مرابع است اسمیر دارنو
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بر پختونخواالپالمندن تو بیریش پیلین پیلین که اور لرانسفر آف کیچرد کیچرد کیچرد (<sup>۲</sup>سر کارز اور ذاکترز ریگولیٹری ایک 2011ء - ) سیکش نمبر 4 کے تحت محکمہ ایلیمنٹر کی اینڈ سیکنڈری ایجوکیٹن نیبر پخر ۱۰ با ترقام (مردانہ/ زنانہ) سکولوں میں دردیہ ذکل آسامیاں پرکرنے کیلیے فسیر پختونخوا کے متعلقہ اصلاح کی سکونی ایل ۱۰ داست فارم NTS مے دبیب مائٹ (/intp://www.nts.org.pt) پر متیاب ہے۔ مقرر ہتارت گز رنے کے بعد موصول مونے والی درخوا<sup>ی</sup> توں کیا جائے گار

	قابليت	リディン	تمبرشكر
5021	می بنی تنام شد و بو نیورشی <u>ب</u> سیکند <sup>فر</sup> و م <sup>رد</sup> ن سیکر و گری جسکے ساتھ درج زمل دومضامین لا زمی ہوں	سَيَّندُري سَكَوِل فِيجِيرَ (SST)	
. <u>Jb</u>	(۱) تمسلری میالوجی ( دوابوجی پاپاژی ) (2) سکتی بنجر، تسلیم شرد یو زور می سے ایم اسے ایجو کیشن میں بیچلر ڈگری (	بيالو بی/ كيسشري BPS-16	
i5t21	م المراجع ال	بيندري سكر بالجرز (SST)	2
- UV	(۱) فریم میتون A یا (۱۱) از سر ظلما (۱۱) فری المسلس 🙄 کی بھی تشایم شدہ یو تر 📜 ایم اے ایم کمشن یا ایج کمشن میں چلرد کر ک	BPS-16	
35721	مسی جن بسایم شده او نیورش سیه سیکتد و بیزن بینجر دو کردن جیسی ساتھ در مانویل دومندا مین لارمی ہول	سینڈری سکول نیچر ( SS)	3
مال	(۱) انگریز ن لازی ، و مینیز <sup>ت</sup> ز ور به یادیگر مه مادی گروپ (2) کسی بهمی تسلیم شده یو نیور می سے ایم ایے ایموکیشن یا ایجوکیشن میں چوکرد گ <sup>ر</sup> ری	:- لBPS-16	

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- -	کل نیبر	تشيمي قابليت	ا كل دُمَانِين	تعليمى فاجليت
	حاصل كرد دنمبر ×15 تغنيم كل تمبر	بنايد إيم الم الجويش	مامن کرده نمبر بادن المسیم کل نبر	الير اليري ا
	جائىل كرد دىنبىر 05x كىتىيە كىل نىبر	المجارية المجارية الجويمش الأ	م جاصل کردہ نمبر بربایتر سیم میں مبر	الليب البية الين السراي
	جاصل کرد دنمبر 05x تقشیم کل تمیر	132 3551以北日の	ما <sup>ع</sup> ل کرده نبر ۲۰۰۰ ۲۰۰۰ ۲۰۰۰ ۲۰۰۰	بالم المحالي ا
		صل کرد ، بیر، 15 تقسیم کل نبسر		الج الے الم الح مالی کی

۵۰: ۲- برسکول کو آیجای کمیلفانیک میرساست مرتب کمیا جانی علی میر امیدواردن کے NTS کے حاصل کردہ نمبرا درتعلی تابلیت کے نیبروں کو جن کیا جائے۔ سب ہوامیہ والات الآق دلاخواست فا زم 300 روسایہ چارج کر کیا تہ ہوکہ ابر دارخود بڑوا شدہ کو بیٹے۔

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	· 、	<u> </u>	Khan	hairullah	SCT	16	4/10/1964			CT/B.Ed	5/3/1986	5/3/1986	1/6/1987	
				Auhammad Kamal	SCT	16	4/1/1961 3/15/1966		MA	CT/B.Ed		10/11/1982 8/21/1982	5/26/1987	
		2 Asta	mooor	Auhammad Junain	SCT	16	3/3/1961	Swat	MA	CT/B.Ed	8/1/1982	9/17/1987	9/17/1987	
				Jmar Bakht	ISCT ISCT	16 16	3/4/1962	Swat		<u>ci</u>	9/17/1987 11/6/1982		11/29/1987	
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		6 Bak	ht Sherawan 🕴 👘	Mahmood Khan	SCT	16	2/3/1959			ст СТ	7/10/1982	7/10/1982	11/30/1988	÷
		- 7 Mu	hammad Ali	aid Mahmood azal Rahman	SCT	16	2/7/1960	5000		CT/B.Ed	1/15/1985	4/26/1989	9/16/1585	
		8 Toti		Amanullah Khan	SCT	16	3/1/1965	5		CT	3/9/1982	9/17/1989	10/1/1989	
	-	9 Mo		Muhammad Zarin	SCT	16	5/11/1962 15/4/1963	30000		CT/B.Ed	7/20/1982	10/1/1989 10/1/1989	10/1/1989	
			1511e0 1811011	Abdul Ghafar	SCT	16	\$1/1/1961	Swat		CT	11/13/1984	11/15/1983	1/17/1990	
		L	amat Ali i al Rahim	Fazal Ahad	SCT	<u>16</u> 16	10/1/1964	Swat		СТ	3/1/1988	3/1/1988	1/17/1990	
				Tota	SCT	16	1/1/1962	Swat		СТ	6/1/1988		1/17/1990	
		14 Sha	h Rom Khan	Hakim Khan Mian	ISCT	16	÷1/4/1961	11101			2/6/1990	2/6/1990	<u>* 2/6/1990</u> 2/8/1990	
		15 Sad	lio Ahmad :	Abdul Hamid	SCT	16	13/1/1963	Swat	MA		2/8/1990	2/8/1990	11/14/1990	
		16 Mu	hammad Rafiq	Badish Hazrat Ahmad	SCT	16	, 2/3/1964	Swat	11	CT/B.ed	4/18/198	4/18/1983	11/14/1990	
		17 Ęid	a Hussain dayatullah - 3rd Divisior	Sultan Sikandar	SCT	16	×1/1/1959 3/12/1968	l <u>Swat</u> I Swat		CT	12/8/1990	12/8/1990	12/9/1990	
			dayatulian 3ro Divisio	Ghulam Nabi	SCT	16	3/12/1965	Swat	BA	СТ	12/9/1990	$\frac{12/9}{1990}$	12/11/1990	
			shid Khan	Pir Dad	SCT	16 16	× 2/8/1963	Swat		CT	12/11/1990	0 12/11/1990 0 12/11/1990		
			ent Gilal	Zirat Gul	SCT	16	1 4/4/1969	Swat		CT/B.Ed	5/6/198	6 1/1/1990	_/_/	
		21 Ha 22 Azi	All and	Fazal Khaliq	- Isci	16	12/12/1964	Swat			5/4/198		3/14/1551	
	· .	23 152	zal Wahab 🕴 🔄 🔄	Gul Mahmood	SCT	16	1/1/1968	5 Swat	10.1	<u>a</u>	11/5/198	6 5/11/1986	<u>3/14/1991</u> <u>3/14/1991</u>	
		24 MI	uhammad Majid	Umar Zada — Sultan Mehmood	SCT	16	; 1/1/1964	4 Swat	0.4	<u>с</u>	11/24/198	6 11/24/1986	4/10/1001	•
		25 Ra	hman Deyar	Khisat Gul	SCT	16	7 8/1/196	2 Swat		CT -	4/2/198	7  4/10/1991	7	
		26 Ha	roon - Ur - Rashid	Alam Zeb Khan	SCT	16	7 4/1/196	3 <u>Swat</u> 1 Swat		CT	11/24/198	4 11/24/1984	10/22/1001	•
·.				Abdur Rashad	SCT	16	12/9/196 5/15/196	4 Swat		СТ	3/11/198	5 <u>3/11/1985</u> 6 5/6/1986	10/22/1991	
			alat Khan hter Ali	Ghulam Muhammad	SCI	16	3/20/195	9 Swat		СТ	5/6/198		4/2/1992	
			iran Ali	Mashooq Ali	SCT	<u>16</u>	1/10/196	7 Swat	FA	СТ	5/17/198 3/1/198		4/2/1552	
		31 M	uhammad Rahman	Bakht Zad	SCT SCT	16	1 2/2/196	1 Swat		त	6/1/198	6/1/198	4/2/1992	
		32 Sh	aralat Ali Khan	Alsar Khan	SCT	16	1 4/2/196	4 Swat	AB	CT CT/B.Ed		7 12/20/1989		
		33 Ar	nir Zeb	Muhammad Zareen	SCT	16	+ 5/15/196	3 Swat	BA	CT	8/14/199	8/14/199	0/1/1007	<b>\</b>
		24 Ar	nir Muhammad	Tota Mian Ahmad	SCT	16	; 3/2/196		MA	CT/B.Ed	9/2/198	36 1/9/199	0/2/2007	1 .
		75 104	chtar Hussain 3rd Divi	Habibur Rahman	SCT	16	3/10/196	8 Swat	MSC	CT/B.Ed	9/2/19:	9/2/199	1 1007	1
	•		uhammad Ziaud Din	Shah Rome	SCT	16	1/1/196	2 Swat		CT	4/23/190	38 4/23/198 38 4/17/198	8 11/22/1992	i
			Iltan Rome t	Malak Sherin	SCT	16	5/1/196	3 Swat	t MA	CT/B.Ed	4/17/19		4/21/1993	1
1		1_1	iuhammad Nabi	Ghulam	SCT SCT	16	4/14/196	6 Swal	t  BA	CT/B.Ec	11/1/19		<u>4/29/1993</u>	J
Port .		39 M 40 Ja	mshid Khan	Hazrat Jee	SCT		7/3/190	54 Swat	t BA	CT/B.Ec			······································	
	•	40 .18 41 .18	akhtyar 3rd Divi	Bacha						•	· ·	~	F1 	
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		FINAL SENRIOTY L	IST OF	ets oyu	THE DISTRIC					Le marine d'él	Seniority position
-£+-9			<u></u>						D/O 1sta Apptt	Z-Date.of	
				••••		÷.,	Aca			apptt:	D/O taking over charge
	Name of		Desi		D/O Birth	Domic	- Comi	Profess ≰ional	. D/ଠ୍ୟାର୍ଟ୍	against	as CT or D/O
S.No	Teacher/Qualification	Father's Name	gnati	PBS	/ Domicile	ile	بيج ستداري:	ional-	Apptt	Present	declaration CT-Exam
Now	academic/		on				C i			post -	whichever is later
1.1	professional		- Constra	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	indiale in the	1	B. A. S.	Plantser		5/8/1993	8/5/19
Sec. 1		an office the state of the state of the	ISCT	16	5/12/1965	Swat	MA	CT/B.Ed	5/8/1993		12/25/19
42	Ashraf Ali	Hazrat Ali	SCT	16	1/7/1964		MA :	CT	9/24/1989	9/24/1989	12/25/19
43	Shah Bakht Rawan	Umara Khan	1	16	1/2/1965	Swat	ВА	СТ	10/2/1989	10/2/1989	12/25/19
44	Muhammad Hamayun	Faramoz Khan	SCT		5/1/1962	Swat	MA :	CT/B.ed	3/10/1989	10/3/1989	12/25/19
	Amir Bahadar	Sarwar Gul	SCT	16	2/24/1967			CT ·	11/29/1989	11/29/1989	12/25/19
46	Bakht Sherwan	Fazal Rahman	SCT ···	16	1/16/1967			СТ	11/30/1989	11/30/1989	10/05/00
	Bakht Muhammad	Mu'amber Khan	SCT	16	5/1/1965	Swat		CT.	12/4/1989	12/4/1989	
	Noor Rahman	Jumma Gul Khan	SCT	16	2/1/1963	Swat		СТ	12/12/1989	12/12/1989	12/25/19
	Mehboob Ali	Amir Rahman	SCT	16		Swat		CT/B.ed	12/14/1989	12/14/1989	12/25/19
	Muhammad Sadiq	Qalandar	SCT	16	9/11/1965			CT/B.Ed	12/17/1989	12/17/1989	12/25/19
	Magsood Ahmad	Davray	SCT	16	6/5/1963	Swat	BA	CT	10/3/1989	1/4/1990	12/25/19
		Said Karam	SCT	16	12/3/1966	Swat	MA	CT/B.Ed	· 6/10/1990	6/10/1990	12/25/19
	Shuja Mulk	Sadbar Khan	SCT	16	1/20/1960	Swat		CT/B.Ed	9/26/1988	11/10/1994	11/10/19
	Alamgir	Hasham Khan	SCT	16	3/1/1969	Swat	MA	CT/B.ed	11/10/1994	11/10/1994	1 1/10/13
	Anwarullah	Fazal Wahab	SCT	16	4/15/1969	Swat	MA		0/8/1986	11/11/1994	1 1/11/12
	Fazal Hameed	Mian Said Buhar	SCT	16	3/3/1966	Swat	MA	CT	6/14/1987	11/12/1994	11/12/12
~~	Nadar Khan	Amir Rawan	ISCT ·	16	5/1/1965	Swat	MA	CT/B.Ed	17/17/1989	12/12/1989	11/15/19
57	Bad Shah Ikhan		SCT	16	1/1/1964	Swat	BA	СТ	12/12/1909	11/15/1994	11/15/19
	Sher Bahadar Khan	Gul Zaman	SCT	16	2/2/1964	Swat	MA	CT/B.Ed	11/10/1994	11/15/1994	11/15/19
	Aziz Ahmad	Muhammad Rashid	SCT	16	5/12/1967	Swat	MA	CT/B.Ed	11/15/1994	11/15/1994	11/15/19
60	Afzal Shah	Badshah Zada	SCT	16	3/20/1969	Swat	MA '		11/15/1994	11/15/1994	
61	Bakht Alam	Ghulam Qadir	ISCT	16	2/1/1965	Swat	MA	CT/B.Ed	12/1/1986	11/16/1994	
62	Muhammad Rahman	Sherin Jalal	ISCT	16	2/11/1968	Swat	MA	CT/M.Ed	8/1/198/	11/16/1994	
63	Sher Ali Khan	Sadar	·	16	7/20/1969	Swat	MA	CTB.Ed	11/16/1994	11/16/1994	
64	Ziaullah Khan	Muhammad Alam Gul	ISCT		4/2/1964		MA	CT/B.Ed	9/28/1988	11/18/1984	
65	Muhammad Munir	Habibullah Khan	SCT	16	1/20/1965	Swat	MA	CT/B.ed	11/21/1984	11/21/1994	
66	Gul Pervize	Rahmani Gul	SCT	16	6/5/1964	Swat	B.Sc	СТ	5/12/1992	11/24/1994	
67	Abdul Qadoos	Ghulam Khaliq	SCT	• 16			M.Sc	CT/M.Ed	11/27/1986	12/20/1994	12/20/1
	Sarir Ud Din	Fazal Wahid	SCT	16	3/26/1963	Swat	MA	CT/B.Ed	4/2/1987	12/21/1994	12/21/1
	Muhd Zahir Shah	Azizur Rahman	ISCT_	16	12/2/1960	Swat	MA	CT	6/7/1987	12/21/1994	12/21/1
1	Muhammad Ghafar	Khan Bahadar	SCT	16	2/27/1961		MA	CT/M.Ed	8/11/1988	12/21/1994	1 12/21/1
	Amanullah Khan	Sakhi Rawan	SCT	16	9/12/1961	Swat	1	CT/M.Ed	9/78/1988	12/21/1994	12/21/1
71		Taj Muhammad Khan	SCT	16	9/9/1958		MA	CT/M,Ed		12/22/1994	12/22/13
	Sher Azim Khan	Fazal Rahman	SCT	16	2/2/1969		MA		0/20/1988	1/10/1988	12/25/1
	Fatehur Rahman	Hermooz Khan	SCT	16	1/1/1965		MA	CT	12/25/1002	12/25/1994	12/25/1
	Rafiq Ahmad	Abdul Jabbar	SCT	16	4/15/1965		BA		0/0/1000	12/27/1994	11 12/2//13
11 V	Alam Zeb	Muhammad Karam	Iscr	16	1/1/1968	1 20000	MA		3/4/1300	17/27/1994	12/27/19
	Inamullah Khan		SCT	16	1/1/1960	Swat		CT/M.Ed	12/2//1994	12/27/1994 3 1/1/199	
77	Alam Zeb	Bughdaday	SCT	16	2/16/1964		MA	CT/M.Ed	9/26/1988		
78	Azizullah	Haji Munammad	ISCT	16	4/10/1966		MA	CT/8.Ed	12/5/1989	12/5/130	
79	Amjad Ali	Faqir Khan			2/15/1965		MA.	CT/B.Ed	5/3/1986	5/3/198	
180	Samiullah	Roohul Amin	SCT	16	3/8/1958		BA '	CT/B.Ed	4/1/198	7 4/1/198	
81	Dost Muhammad Khan	Taj Muhammad Khan	SCT	16	5/1/1967				10/1/1989	10/1/198	1/3/1
	Wazir Zada	Gulzar Khan	SCT	16	1111201	1				2	

THE SCALE OF CTS O/O THE DISTRICT EDUCATION OFFICER (M) DISTRICT SWAT UPTO 31/05/2018

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			FINAL SENRIQTY I	ICT OF		THE DISTRIC	τ ερύςΑ	TION C	DFFICER (N	) DISTRICT S	<u>VAT UPTO 3:</u>	1/05/2018
	Service and the second second										Date of	Seniority position
~ ~		an a	ا مېلېدو ته ولولو وې د وې ا <u>لتونو او وې د د د د د د د د د د د د د د د د د د</u>	1	1			·		andre en kaderiet. Be	apptt:	D/O taking over charge
· · ·		Name of		Desi		D/O Birth	Domic	Aca	Profess Jonal	D/O 1st	against	as CT or D/O
		Teacher/Qualification		gnati	PBS	LDomicile		demi	ional	Apptt:	Present	declaration CT/Exam:
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1		professional					Т. Т.				post	1/9/1995
	通道》 清	1.1 1日間の時間の		ISCT	16	5/1/1961	Swat	MA	CT/B.Ed	10/2/1989	10/2/1989	
	83		Khan Sherin	SCT	16	2/2/1965		MA		11/28/1989	11/28/1989	
[		Number and a second and a second	Shahzada Siahoosh Khan	SCT	16	6/5/1963		MA	CT/B.Ed	12/10/1989	12/10/1989	1 · · · · · · · · · · · · · · · · · · ·
$\setminus$		Bakhtmand	Musharaf Khan	SCT	16	6/5/1963	Swat	BA	CT/B/Ed	1/13/1990	1/13/1990 1/19/1990	1/9/1995
		Mukaram Khan	Bahroz Khan	SCT	16	5/25/1962	Swat	MA	CT/B.Ed	/19/1990		
-		Afzal Hussain	Sher Alam Khan	SCT	16	1/1/1969	Swat	BA	CT ,	1/19/1990		1/9/1995
		26100111098	Syed Rashad	SCT	16	3/15/1963	Swat	BA	CT 🔅	2/15/1990	2/15/1990	1/9/1995
			Bakht Biland Khan	SCT	16	2/18/1963	Swat	B'A	CT :	3/1/1990	3/1/1990 4/1/1990	
			Amir Fageer	SCT	16	3/10/1963		MA	CT T	4/1/1990		1/9/1995
-			Mubin	SCT	16	2/5/1964		MA	СТ	4/14/1990	4/14/1990	1/9/1995
			Amir Hamza	SCT	- 16	6/1/1963	Swat	MĂ	CT/B.Ed	4/21/1990	4/21/1990 5/13/1990	1/9/1995
			Shah Dilbar Mian	SCT	16	3/17/1969	Swat	MA	CT/B.Ed	5/13/1990		1/9/1995
<b>'</b> -{		Ail Bash Khan	Qaisar Khan	SCT	16	1/1/1963	Swat	MĂ	CT/B.ed	\$/13/1990	5/13/1990	1/9/1995
ĺ	00	Akbar Ali	Khalilur Rahman	SCT	16	7/1/1964		MA	CT/B.Ed	\$/13/1990	5/13/1990	
[		Alamgir i	Ahmad	SCT	16	12/1/1959		MA	СТ	8/20/1990	8/20/1990	
[		Fazal Azim	Muhammad Karim	SCT	16	3/15/1970	Swat	MA	CT/B.Ed	10/10/1988	11/20/1990	1/9/1995
· [	00	Karim Ullah		SCT	16	6/17/1959	Swat	BA	CT/B.Ed	5/24/1992	5/24/1992	1/9/1995
ĺ	5	Ibilahim	Amir Hatam	SCT	16	4/3/1966		MA	CT	9/1/1989	12/1/1994	1/16/1995
[	100		Muhammad	SCT	16	3/7/1963		MA	CT B.Ed	6/11/1987	1/16/1995	1/16/1995
S02		Muhammad Fahim Khan		SCT	16	4/26/1967	Swat	MA	CT M.Ed	9/25/1992	1/16/1995	1/18/1995
1.41		Muhammad Dawood Khar		SCT	16	4/21/1959	Swat	BA	СТ	3/6/1990	1/18/1995	1/21/1995
)(j_1)	103		Sani Gul	SCT	16	5/1/1962		MA	CT/B.Ed	1/19/1995	1/19/1995	2/1/1995
sered sered	104	Jehan Sher	Umara Jan Abdul Qadir Khan	SCT	16	1/12/1967	Swat	MA	CT	₽/20/1990	2/1/1995	2/22/1995
) · · [		Hanif Khan		SCT	16	3/3/1969	Swiat	MA	СТ	2/21/1995	2/22/1995	
ſ		Abdul Wahab	Amir Bashar	SCT	16	5/5/1964	Swat	MA	CT	; 2/2/1995	4/10/1995	
[		Sajawal Khan	Taj Khan	SCT	16	5/4/1970		MA	CT/M.Ed	2/2/1995	4/10/1995	
[		Anwar Zeb	Alam Zeb Khan	SCT	16	1/1/1967	Swat	BA	CT/B.Ed	4/7/1988	4/16/1995	4/17/1995
ſ		Kishwar	Ghulam Nabi	SCT	16	5/1/1970		MA	CT/M.Ed	11/7/1994	4/17/1995	5/15/1995
•[	10	Millojao ent	Mirajud Din	SCT.	16	1/30/1966		BA	CT	10/17/1988	5/15/1995	
M		Bakht Biland	Shah Zada	SCT	16	11/8/1962		MA	СТ	8/8/1984	8/1/1995	
[		Within the second	Khyber Muhammad Ghafoor	SCT	16	1/10/1966	Swat	MA	CT/B.Ed	5/14/1992	8/1/1995	8/7/1995
[				SCT	16	4/5/1964	Swat	MA	CT/8.Ed	2/29/1984	8/7/1995	
ſ		stionalistic age	Amir Nawab	SCT	16	1/1/1967	Swat	BA	CT/B.Ed	8/22/1995	8/22/1995	· · · · · · · · · · · · · · · · · · ·
ľ	115		Akbar Khan	SCT	16	3/15/1963		MA	СТ	9/27/1988	8/24/1995	
ſ	116		Naik Muhammad	SCT	16	4/1/1967		MA	СТ	5/14/1987	9/1/1995	
ľ	117	Ali Rahman 👘 🧃	Fazal Rahman	SCT	16	3/20/1964	Swat		CT	4/3/1995		
F	118	54/44	Muhammad Mian	SCT	16	1/15/1962		1	CT/B.Ed	3/17/1984		9/23/1995
ľ	110		Muhammad Zaman	· · · · · · · · · · · · · · · · · · ·		10/1/1970			CT/B.Ed	9/24/1995		1/24/1996
F	120 ·	Muhammad Afzal Khan	Sher Dii Khan	SCT	16	4/16/1975		J	CT	5/1/1996	5/1/1996	5/1/1996
ŀ	121		Ahmad Khan	<u>SC</u> SCT	16	4/13/1969			CT/M.Ed	9/16/1992	9/16/1992	5/5/1996
-	122		Muhammad Perviz		16	4/15/1972	L		CT/M.Ed	3/17/1996	3/17/1996	
ŀ	123	Fazal Hadi	Muhammad Yousaf	SCT	16	4/15/15/1				<u></u>		

Counterparts at an

FRICER (M) DISTRICT SWAT UPTO 31/05/2018

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			Associate Degree in Education from a recognized University or eighteen months	(b) sixty percent by promotion on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General). Provide that if no suitable candidate is available amongst the Primary School Head
		n (2019) z Osalo Provinský provinský provinský provinský provinský provinský provinský provinský provinský prov 1 – Se udožna – Mandy Provinský provinský provinský provinský provinský provinský provinský provinský provinský	hand - All & Congress of a second of the second of the second of the Solution	Teachers for transfer, then the posts will be filed by promotion on the basis of seniority-cum- fitness from amongst senior primary school teachers with at least five years service and having qualification prescribed for initial recruitment of certified teacher (General). Note: In case of non availability of suitable person for promotion then by initial
	14.	Certified Teacher (Industrial Arts) (BPS 15)	-	<ul> <li>(a) Forty percent by</li> <li>initial recruitment; and</li> <li>(b) sixty percent by</li> <li>promotion on the basis of</li> <li>seniority-cum-fitness</li> <li>from amongst the</li> <li>primary school head</li> <li>teachers with at least five</li> </ul>
	Ŵ		· · · · · · · · · · · · · · · · · · ·	

		COPY OF P	ACT		
		abic (1	) Second Class By initial recruitment		وم لائة شرو ما مراجعة مرومة مراجعة المام
		eacher S	econdary School	1997. 19	2-92-4,900 
			Certificate from a	1	
	1	· · · · · · · · · · · · · · · · · · ·	ecognized Board with	<u>у</u> ж	
			Shahdatul Alamia Fil		
			Jloomul Arabia wal	к, 1	Ì
			slamia from or Darul Jloom Saidu Sharif		· ]
			Swat, Darul Uloom	L	. ·
			Darosh Chitral,		\$
			Government run Darul	•	
			Uloom, as notified by		
			the Government from	1924. 1924	
and the second sec			time to time; or	H.	
		• •	(ii) Second Class	n n n n n n n n n n n n n n n n n n n	1777 - 1 1 1 1
			Master's Degree in	· · ·	
			Arabia from a	י - נ	.;
			recognized University. (i) Second Class (a) Seventy five	;	}
·	1		Secondary School percent by initial	•	
			Certificate from a recruitment; and	л н н	
		15)	recognized Board with (b) twenty five percent	•	- 1
			Shahdatul Alamia Fil by promotion on the		7 4
			Uloomul Arabia wal basis of seniority-cum-		
· · · .			Islamia from or Darul fitness from amongst Uloom Saidu Sharif the senior Qaris with		۱ ۲
			Uloom Saidu Sharif the senior Qaris with Swat, Darul Uloom at least five years		i
			Darosh Chitral, service and having	. इ. मे	
			Government run Darul qualification		1
الموادية المروانية والمطراب المراد	-	I The structure unings they are the	Uloom, as notified by prescribed for initial	:	-
			the Government from recruitment of	•	· ·
			time to time; or Theology Teacher;		
			(ii) <sup>i</sup> Second Class Note: In case of non Master's Degree in availability of suitable	j.	
			Master's Degree in availability of suitable Arabia from a person for promotion	<b>.</b>	*
			recognized University. then by initial	5 1. 2	
			recruitment.	\	
	12.	Senior Qar	By promotion on the	,	
; • . •		(BPS-15)	basis of seniority-	,	
			cum-fitness from	4	
		;	amongst Qaris with	<b>}</b>	
and the second			at least five years such and	ی دا	
	N. ST T		having qualification	4 4 •	
M			as prescribed for	ч. Т	
in a similar of the A	• 1977 - F = 97 -	to grade or any however the second and second	initial recruitment.	:	
	13.	Certified	Bechlor's Degree or (a) Forty percent by	e e per	* **
		Teacher	equivalent qualification initial recruitment; and	2.	· ;
		(General)			
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			<ul> <li>(iv) one percent from amongst the Instructional Material Specialists, with at least five years service as such and having qualification mentioned in column No. 3, and</li> <li>(v) one percent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No. 3, and</li> </ul>
2.	Seniority Arabic Teacher (SAT) (BPS-16) Senior		(b) fifty percent by initial recruitment. By promotion on the basis of seniority-cum-fitness from amongst Arabic Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher. By promotion on the basis of
4. Senior	Theology Teacher (STT) (BPS-16)		seniority-cum-fitness from amongst Theology Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher. By promotion on the basis of
 Certified Teacher (SCT) (General) (BPS-16)	**************************************	g . ign- hereet	seniority-cum-fitness from amongst Certified Teachers with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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The Director Curriculum & Teachers Education Abbottabad.
 The Director (PITE) Khyber Pakhtunkhwa Peshawar.
 The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
 The Deputy Director Database(EMIS) E&SE Department.
 All District Coordination Officers in Khyber Pakhtunkhwa.
 All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
 All District Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
 All Agency Education Officers FATA.
 P.S to Chief Minister, Khyber Pakhtunkhwa.
 P.S to Chief Secretary, Khyber Pakhtunkhwa.
 P.S to Chief Secretary, Khyber Pakhtunkhwa.
 P.S to Secretary E&SE Department.
 Master File.

Section Officer (Primary)

ATTESTED

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## JUDGMENT SHEET SHAWAR HIGH COURT, PESHAWARCOUR (JUDICIAL DEPARTMENT) COC No. 105-P/2018 in WP No. 355/2014 O

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JUDGMENT

Date of hearing: 08,11,2018

Petitioner (s): Nivar Ohmail 20: Mr. Noor Mulinomud Whokek Respondent (s): Muliammad Dram titur) kp- Gred Caixer di Shih Opti

WAQAR AHMAD SETH, CJ:- Through this

single judgment, we propose to dispose of instant contempt petition as well as connected COC No. 107-P/2018 in WP No. 1662/2010, COC No. 108-P/2018 in WP No. 2967/2009 & COC No. 109-P/2018 in WP No. 3189/2009 because in all the petitions, the petitioners have sought initiation of contempt of court proceedings against the respondents for not implementing the judgment/order dated 26.01.2015.

2. Facts in brief are that the petitioners had filed Writ Petitions before this Court and prayed that the Act No. XVI 2009, namely, 'The North West Province' Employees (Regularization of Services) Act, /2009 dated 24<sup>th</sup> October, 2009' being illegal unlawful, without authority and jurisdiction, based on malafide intentions and being unconstitutional as well as ultra vires to the basic rights as mentioned in the constitution be set-aside and the respondents be directed to fill up the above noted posts after going through the legal and lawful and the normal procedure as prescribed under the prevailing laws instead of using the short cuts for

> ATTESTED EXAMINER Enshawar High Court 3 0 NOV 2018

community of court and they are liable to be proceeded and punished under the law; hence, the instant petitions.
4. Respondents No. 2 & 3 have filed reply to the show cause and prayed for dismissal of instant petitions.

Arguments heard and record perused.

While deciding writ petition No. 2905/2009, vide judgment dated 26.1.2015 which has been upheld by the apex Court, the respondents-department was directed to workout the backlog of the promotion quota and consider in service employees for promotion against the vacant post, till the backlog is washout. In this respect record is suggestive that the backlog was worked out and by that time 2725 employees ? teachers were in the promotion zone and as such were promoted. Moreover, by virtue of Regularization Act, 2009/ Act No. XVI of 2009, 1766 employees / teachers got regularization and as such, when worked out, the promotion quota was fully exhausted. The judgment in this respect was not for all the times to come for promotion purposes. Once the promotion quota, which was given advantage, in view of Regularization Act, 2009, cannot be claimed again and again. By now it's the question of fact that as to whether any employee / teacher was not promoted and by that time when Act 2009 was enforced they were in the promotion zone. Even otherwise, once backlog was worked out and promotion was done then claiming seniority and promotion is the job of service tribunal.

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7. In view of the above, the instant as well as connected contempt petitions are disposed of in terms above.

Justice

Show cause notice issued to respondents is hereby recalled.

ANNOUNCED. Duted: 08.11.2018

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