

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

**Service Appeal No: 1473/2022**


**Alim Khan, SST BPS-16 District Kurram.....Appellant**

**VERSUS**

**Government of, Khyber Pakhtunkhwa through the Secretary E&SE  
Department & others.....Respondents**

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**Assistant Director (Lit: II)**  
**E&SE Khyber Pakhtunkhwa,**  
**Peshawar**

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
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Department & others.....Respondents**

**JOINT PARAWISE COMMENTS 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 to file the instant appeal.
- 2 That the appellant is not an aggrieved person within the meaning of Article 212 of the constitution of 1973 Islamic Republic of Pakistan.
- 3 That the appellant has concealed material facts from this Honorable Bench.
- 4 That the Appellant has not come to this Honorable Court with clean hands.
- 5 That the appeal in hand is based on mala fide intentions for illegal service benefits.
- 6 That the appeal in hand is barred by law in view of the law of limitation.
- 7 That a CPLA has already been filed by the Respondent Department in the Supreme Court of Pakistan against the judgment dated 14-07-2021 in Service Appeal No. 1266/2018 Afzal Shah SST VS Govt; which is also identical with the titled case.

**ON FACTS.**

- 1 That Para-1 pertains to the Academic record of the appellant.
- 2 That Para-2 also pertains to the appointment against the CT (M) post of the appellant appointed vide order dated 19-09-1998, whereas, the plea regarding his promotion to the post of SST along with his adjustment at G.I.S.H.S District Kurram is subject to the production of cogent proof & record which lies upon the shoulders of the appellant.
- 3 That Para-3 is correct that vide Notification bearing No. SO(PE)/4-5/SSRC/Meeting/2013/TC dated 24-07-2014, the criteria for promotion/upgradation in the upper scales to the Teaching Staff working in the Khyber Pakhtunkhwa was framed & Notified by excluding the Teachers of Ex-FATA/NMDs which were directly falls within the administrative authority of the Federal Government & was merged into Khyber Pakhtunkhwa through the 25<sup>th</sup> amendment in the constitution of 1973

through the National Assembly endorsed by the Senate of Pakistan & approved by the president of Pakistan.

Therefore, the appellant does not falls within the ambit of aforesaid service rules dated 24-07-2014 as the cases have been proceeded by the Director Ex-FATA in the year 2017 after the approval of the Federal Government copy of the service rules dated 24-07-2014 attached as *Annexure-A*.

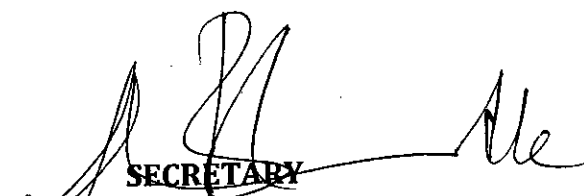
- 4 That Para-4 is correct that vide letter dated 07-08-2014, all the DEOs (M/F) throughout Khyber Pakhtunkhwa were directed to process the cases of Teaching Cadre working in the settled areas of Khyber Pakhtunkhwa in view of the service rules under reference.
- 5 That Para-5 is incorrect as the Respondent No.2 is mainly responsible for processing the cases of Teachers for promotion & upgradation to the post of SST (BPS-16) under the service rules who are working in the Khyber Pakhtunkhwa (Settled Areas) during the period w.e.f. 2014 to 2017 excluding the Teaching Staff of Ex-FATA due to the lack of jurisdiction by the then Government of Khyber Pakhtunkhwa.
- 6 That Para-6 subject to the proof & record to the extent of the letter dated 31-10-2014 of the then District Education Officer (Male) Hungu attached as *Annexure-B*.
- 7 That Para-7 is correct that vide letter dated 09-03-2015 all concerned have been directed to process the cases of Teaching Staff for promotion to the post of SST under the rules by the authority concerned attached as *Annexure-C*.
- 8 That Para-8 is also incorrect as the act of the Respondent No. 3 & 4 is within legal sphere in view of the submissions made in para-3 of the present reply by the Department.
- 9 That Para-9 is incorrect as the act of the Respondent No.3 with regard to the Seniority & promotion of the appellant & all other Teachers working Ex-FATA/NMDs is within legal parameter of even in accordance with the Notification dated 13-11-2012 attached as *Annexure-D*.
- 10 That Para-10 is correct to the extent of order dated 28-02-2017, whereby, upgradation in view of the Notification dated 24-07-2014 was allowed w.e.f. 2017 to the teaching staff Ex-FATA upon the approval of the Federal Government. (Copy of the Notification dated 28-02-2017 is *Annexure-E*).
- 11 That para-11 is also incorrect as the service rules dated 24-07-2014 was not extended to the Ex-FATA/NMDs during the period w.e.f. 2014 to 2017 rather it was extended & implemented w.e.f. 2017 & whereby, the appellant was promoted vide order dated 11-10-2017 by the Department
- 12 That Para-12 is incorrect, as no Departmental appeal has been filed against the order dated 11-10-2017 by the appellant till date, hence, got finality under the law.
- 13 That Para-13 is subject to the proof & record.
- 14 That Para-14 is subject to the proof & record which is lies upon the appellant.
- 15 That Para-15 is correct to the extent of the judgment dated 14-07-2021 of this Honorable Tribunal rendered in Service Appeal No. 1266/2018 Afzal Shah SST VS Govt; which is not applicable upon the case of the appellant.


16 That Para-16 is also incorrect, hence, denied on the grounds that the appellants is not an aggrieved person within the meaning of Article 212 of the constitution of 1973, therefore, the case in hand is liable to be dismissed on the following grounds inter alia:-

ON GROUNDS.

- I. Incorrect & not admitted. the appellant has been treated as per law & rules.
- II. Incorrect & not admitted. As reply to this ground has been given above.
- III. Incorrect & not admitted. As reply to this ground has been given above.
- IV. Incorrect & not admitted. The act of the Department is legal with no discrimination to words the appellant in the titled case.
- V. Incorrect & not admitted. The Notification dated 24-07-2014 is not applicable upon the case of the appellant during the period of w.e.f. 2014 to 2017.
- VI. Incorrect & not admitted. As reply to this ground has been given above.
- VII. Incorrect & not admitted. Hence, needs no further comments.
- VIII. Incorrect & not admitted. The stand of the appellant is illegal as is not entitled for promotion as SST w.e.f. 24-07-2014 under the rules.
- IX. Incorrect & not admitted. However, the Respondents also seek leave of this Learned Bench to submit additional grounds record & case law at the time on date of hearing.

Therefore, in view of the above made submissions, the appeal in hand may kindly be dismissed in favor of the Department in the interest of justice.

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

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

(4)

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 1473/2022**

**Alim Khan, SST BPS-16 District Kurram.....Appellant**

**VERSUS**

**Government of, Khyber Pakhtunkhwa through the Secretary E&SE  
Department & others.....Respondents**

**AFFIDAVIT**

**I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department  
Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the  
contents of the instant para wise Comments are true & correct to the best of my  
knowledge & belief. It is further stated on oath that in this appeal the  
answering Respondents have neither been placed Ex-Parte nor their defense  
has been struck off/cost.**

  
Deponent



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> July, 2014.

NOTIFICATION

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

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

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3.  Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

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				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p>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;</p> <p>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</p> <p>(b) fifty percent by initial recruitment"; and</p>

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(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

1	2	3	4	5
1B	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need-basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A. Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3.</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

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			<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p>
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Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

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

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

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;

Provided that if no suitable candidate is available from amongst

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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

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

(ii) twenty Five percent by initial recruitment.

**Note:**

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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

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(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

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OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) HANGU  
Phone # 0925-621083

NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO(P-1)/4-5/SSRC/M/10/2013/Teaching Ca. dated 24/07/2014, the following SCTs/CTs/DMs/SATs/STTs/Asst Qari/PSHTs/SPSTs and PAs are hereby promoted to the post of SST (Bio-Chem) SST (Phy-Maths) SST (General) and against each BPS-16 (Ps: 10000-800-34000 plus usual allowance as admissible under the rules on regular basis under the existing policy of the Provincial Govt, on the terms and conditions given below with immediate effect and further they all are hereby adjusted against vacant posts noted against each on "School based"

A. 1. PROMOTION OF SCT/CT/PHST/SPST TO THE POST OF SST  
(Bio-Chem) BPS-16

Sr No.	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1.	Mr. Shabab Hussain CT	GHS Shahu Khel	GHS Lodhi Khel	AVP
2.	Muhammd Raham Jan. CT	GMS Sero Khel	GHS Mamoon Banda	-do-
3.	Muhammad Sharif PST	GPS Gandiri Waziran	GHS Gandir Waziran	-do-
4.	Khial Dar Khan DM	GCMHS No.1 Hangu	GCMHS No.1 Hangu	-do-

PROMOTION OF SCT/CT/PHST/SPST TO THE POST OF SST  
(Phy-Maths) BPS-16

Sr No.	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1.	Mr. Muhammad Yousaf SCT	GHS Naryab	GHS Naryab	AVP
2.	Noor Sanib Khan CT	GHS Muhammad Khawaja	GHS Muhammad Khawaja	-do-
3.	Azmat Ali CT	GHS Ibrahimzai	GCMHS No.1 Hangu	-do-
4.	Majeed Gul CT	GHS Kahi Hangu	GHS Kahi	-do-
5.	Rehmat Khan CT	GHS No.2 Hangu	GHS No.2 Hangu	-do-
6.	Muhammad Hilal CT	GHS Ibrahimzai	GCMHS No.1 Hangu	-do-
7.	Qayum Gul CT	GHS Thall	GHS Sarozai Hangu	-do-
8.	Amir Khanan CT	GMS Alwara Miia	GHS Bilyamina	-do-
9.	Abdul Samad PST	GPS No.2 Chapri Naryab	GHS Shanawori Naryab	-do-

PROMOTION OF SCT/CT/PHST/SPST TO THE POST OF SST  
(GENERAL)

Sr No.	Name of Official	Present Place of Posting	Name of School where adjusted	Remarks
1.	Sami ud Din SC	GCMHS No.1 Hangu	GCMHS No.1 Hangu	AVP
2.	Ashraf Hussain	GHS Naryab	GHS Naryab	-do-
3.	Saeed ud Din SCT	GHS Karbogha	GHS Darsama	-do-
4.	Inab Gul SCT	GHS Kahi	GHS Kahi	-do-
5.	Aman ullah Khan SC	GHS Mianji Khel	GMS Qadri Banda	-do-
6.	Nizam Khan SCT	GHS Serozai	GMS Tari Banda	-do-
7.	M. Murad Khan	SCT GCMHS No.1 Hangu	GCMHS No.1 Hangu	-do-
8.	Mr. Mumtaz Ullah SCT	GHS Karbogha	GHS Torawori	-do-
9.	Gul Qadaer Ahmad SCT	GHS Togh Sarai	GHS Togh Sarai	-do-
10.	Habib Ali SCT	GHS Ibrahimzai	GHS Ibrahimzai	-do-
11.	Muhammad Raheem SCT	GHS Bagalo	GMS Turki Banda	-do-
12.	Ain ullah SCT	GHS Togh Sarai	GHS Togh Sarai	-do-
13.	Shafi ur Rehman SCT	GHS Chamba Gul	GHS Chamba Gul	-do-
14.	Ihsan ud Din SCT	GHS Thall	GHS Thall	-do-
15.	Muhammad Karim SCT	GCMHS No.1 Hangu	GCMHS No.1 Hangu	-do-
16.	Khana Din SCT	GHS Dallar	GHS Dallar	-do-
17.	Shah Muhammad SCT	GCMHS No.1 Hangu	GHS Shah Khel	-do-
18.	Sajad Hussain SCT	GHS Serozai	GHS Sarozai	-do-
19.	Qabil Bad Shah SCT	GHS Togh Sari	GHS Sarozai	-do-
20.	Muslim Bad Shah SCT	GHS Shanawori Naryab	GHS Sarozai	-do-
21.	Munawar Khan SCT	GHS Chamba Gul	GMS Togh Choper	-do-

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OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) HANGU

**NOTIFICATION**

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa (PE) 4-5/SSRC/Mee/2013/Teaching Cadre created by the Department of Education, the following posts of S.Ts/CTs/Qari/PHSTs/SPSTs and PSTs are hereby promoted to the post of S.T. (General) notified against teach BPS-16. The promotion will be on regular basis under the existing policy. The promotion will be given below with immediate effect and further promotion against each on "school" based promotion.

A. 1. Promotion of SCT/CT/PHST/SPST to the post of S.T. (Bio-Chem) BPS-16

Sr. No.	Name of Official	Presence place	Name of school	Where adjusted	Remarks
1.	Mr. Shabab Hussain CT	GHS Sarob Khel	GHS Sarob Khel	AVP	
2.	Muhammad Rahim Khan, C.T.	GMS Sarob Khel	GHS Maron Banda	-do-	
3.	Muhammad Sharif, P.S.T.	GPS Gandiri Waziran	GHS Gandiri Waziran	-do-	
4.	Khai Dar Khan D.T.	GCMHS No.1, Hangu	GCMHS No.1, Hangu	-do-	

Promotion of SCT/CT/PHST/SPST to the post of S.T. (Phy-Maths) BPS-16

Sr. No.	Name of Official	Presence place of posting	Name of school	Where adjusted	Remarks
1.	Mr. Muhammad Yousaf S.	GHS Naryab	GHS Naryab	AVP	
2.	Noor Sahib Khan CT	GHS Muhammad Khawaja	GHS Muhammad Khawaja	-do-	
3.	Azmat Lai CT	GHS Ibrahimzai	GHS No.1 Hangu	-do-	
4.	Majeed Gul CT	GHS Kahi Hangu	GHS Kahi	-do-	
5.	Rehmat Khan CT	GHS No.2 Hangu	GHS, NO.2, Hangu	-do-	
6.	Muhammad Hilal CT	GHS Ibrahimzai	GCMHS No.1 Hangu	-do-	
7.	Qayum Gul CT	GHS Thall	GHS, Sarozai Hangu	-do-	
8.	Amir Khanan CT.	GMS Alwara Mila	GHS, Bilyamina	-do-	
9.	Abdul Samand, P.S.T.	GHS No.2 Chapri Naryab	GHS Shanawori Haryab	-do-	

Promotion of SCT/CT/PHST/SPST to the post of S.T. General BPS-16

Sr. No.	Name of Official	Presence place of posting	Name of school	Where adjusted	Remarks
1.	Mr. Muhammad Yousaf SCT	GCMHS No.1 Hangu	GCMHS No.1 Hangu	AVP	
2.	Noor Sahib Khan CT	GHS Naryab	GHS Naryab	-do-	
3.	Azmat Lai CT	GHS Karbogha	GHS Darsamand	-do-	
4.	Majeed Gul CT	GHS Kahi	GHS Kahi	-do-	
5.	Rehmat Khan CT	GHS Mianji Khle	GMS Qadri Banda	-do-	
6.	Muhammad Hilal CT	GHS Serozai	GMS Tari Banda	-do-	
7.	Qayum Gul CT	SCT GCMHS No.1, Hangu	GCMHS No.1, Hangu	-do-	
8.	Amir Khanan CT.	GHS Karbogha	GHS, Toawari	-do-	
9.	Abdul Samand, P.S.T.	GHS Togh Sarai	GHS, Togh Sarai	-do-	
10.	Habibi Ali SCT	GHS Ibrahimzai	GHS, Ibrahimzai	-do-	
11.	Muhammad Raheem, SCT	GHS Bagoto	GMS, Turki Banda	-do-	
12.	Ain Ullah SCT,	GHS Togh Sarai	GHS Togh Sarai	-do-	
13.	Shafi ur Rehman SCT,	GHS Chamba Gul	GHS, Chamba Gul	-do-	
14.	Ihsan ud Din, SCT,	GHS Thall	GHS Thall,	-do-	
15.	Muhammad Karim SCT	GCMHS No.1, Hangu	GCMHS No.1, Hangu	-do-	
16.	Khana Din SCT,	GHSS Dallan	GHSS Dallan	-do-	
17.	Shah Muhammad SCT	GCMHS No.1 Hangu	GHS Shahu khel	-do-	
18.	Sajad Hussain SCT,	GHS Serozai	GHS Serozai	-do-	
19.	Qabil Bad Shah SCT	GHS TOghsari	GHS Mazina	-do-	
20.	Muslim Bad Shah SCT	GHS Shanawori Naryab	GHS Shanawori Naryab	-do-	
21.	Munawar Khan, SCT	GHS Chamba Gul	GMS, Togh Chaper	-do-	

*(Signature)*

*(Signature)*

ATTESTED

ATTESTED

Muhammad Riaz SCT.	GHS Darshi	GHS Darshi	do
Mumtaz Gul SCT.	GHS Thali	GHS Kahi	do
Ahmad ud Din SCT.	GHS Thali	GHS Thali	do
Mujeeb ur Rehman SCT.	GHS Mianji Khel	GHS Thali	do
Habib Gul PST.	GHS Gandiri Waziran	GHS Gandiri Waziran	do
Fariq Khan PST.	GPS Shaikhani Banda	GMS Wach Bazar	do
Muazam Ali PST.	GPS Ibrahimzai No. 1	GHS Ibrahimzai	do
Ishfaq Hussain PST.	GPS Chapri Hangu.	GHS Shahu Khel	do
Wali Muhammad Khan PST.	S Srazmaka No. 1	GMS Azimi Banda	do
Jamil Ahmad PST.	PS Shanawari Hangu	GHS Shanawari Hangu	do
Mr. Muhammad Sadique PST.	PS Jadedi Banda	GMS Sarani Khel	do
Muhammad Iqbal PST.	PS No. 4 Hangu	GHS Shanawari Hangu	do
Khairi Viehmoos PST.	PS Warasia No. 1	GMS Darband	do
Rabil Kha Jan PST.	PS Tavi Dand	GHS Chapri Wazir	do
Hayat Munaninac Khan PST.	PS Gharakh Wair Korona	GHS Chapri Wazir	do
Muhammad Nadeem PST.	PS No. 1 Sero Zai	GHS Mamoon Banda	do
Musam Gul PST.	PS Chamba Gul	GMS Amar Chir	do
Bait Ullah SDM.	CHS Bagato	GHS Bagato	do
Awal Noor Khan SDM.	CHSS Dallan	GHS Mamoon Banda	do
Saif ur Rehman SDM.	CHS Muhammad Khawaja	GHS Muhammad Khawaja	do
Nazir Ullah SAT.	CHS Muhammad Khawaja	GHS Kolti Bala	do
Mr. Hidayat Ullah SAT.	GCMHS No. 1 Hangu	GMS Barh Abas Khel	do
Mr. Abdur Rehman SAT.	CHS No. 2 Hangu.	GHS No 2 Hangu	do
Salih Din STT.	GCMHS No. 1 Hangu.	GMS Samana.	do
Bakhtiar Ahmad Shakir TT.	CHS Shamal Din	GMS Torawori.	do
Ijaz Ahmad TT.	GCMHS No. 1	GHS No. 2 Hangu.	do
Abdur Rehman Qari	GHSS Doaba	GHSS Doaba	do
Zia ul Haq Qari	GCMHS No. 1 Hangu.	GMS Hangu.	do

**Terms & Conditions**

1. They would be on a probation for a period of One Year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their Service Services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se-Seniority will remain intact.
6. No TADA etc is allowed for joining his duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that if any overpayment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
8. They will be governed by such rules and regulation as may be issued from time to time by government.
9. Their posting will be made on school based they will have to served in the place of posting and their services is not transferable to any other station.
10. Before taking over charge once again their documents may be check if they have not the required relevant qualification as per rules they may not be handed over charge of the post.

DISTRICT EDUCATION OFFICER  
(MALE) HANGU

Endst No 3493-3562/10 ST Prom. on/Estab Dated Hangu the 31.10.2014

1. Copy of the above is forwarded for information and necessary action to the
2. Accountant General Khyber Pakhtun Khwa Peshawar
3. PS to Secretary to Government of Khyber Pakhtun Khwa Elementary & Secondary Education Dept. Peshawar
4. PA to Director Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar
5. District Account Officer Hangu
6. All Principals/Headmasters concerned
7. SDED (Male) Hangu
8. Accountant Middle School Local Office
9. Official concerned
10. Master File

DISTRICT EDUCATION OFFICER  
(MALE) HANGU

ATTESTED

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23. Muhammad Riaz SCT,	GHS Darshi	GHS Darshi	-do-
24. Mumtaz Gul SCT,	GHS Kahi	GHS Kahi	-do-
24. Attab ud Din SCT,	GHS Thall	GHS Thall	-do-
25. Mujeeb ur Rehman SCT,	GHS Mianji khel	GHS Thall	-do-
26. Habib Gul P.S.T,	GHS Gandiri Waziran	GHS Gandiri Waziran	-do-
27. Farid Khan P.S.T	GPS Shaikan Banda	GMS Wachi Banda	-do-
28. Muazam Ali P.S.T	GPS Ibrhaimzai No.1	GHS Ibrhaimzai	-do-
29. Ishfq Husain P.S.	GPS Chapri Hangu	GHS Shaikh Khel	-do-
30. Wali Muhammad Khan P.S.T	GPS Srazamaka No.1	GMS Azim Banda	-do-
31. Jamil Ahmad P.S.T	GPS Shanawori Hangu	GPS Shanawori Hangu	-do-
32. Mr. Muhammad Sadique P.S.T	GPS Jadded Banda	GMS Sero Khel	-do-
33. Muhammad Iqbal P.S.T	GPS No.4, Hangu	GMS Shanawori Hangu	-do-
34. Khalid Mehmood P.S.T.	GPS Warasta No.1	GMS Darband	-do-
35. Rabil Kha Jan P.S.T	GPS Navi Dand	GHS Chapri Waziran	-do-
36. Hayat Muhammad Khan P.S.T.	GPS Sheikh Wali Korona	GHS Chapri Waziran	-do-
37. Muhammad Nauman P.S.T	GPS No.1 Sero Zai	GMS Mamood Banda	-do-
38. Musam Gul P.S.T	GPS Chamba Gul	GMS Anar Chima	-do-
39. Bait Ullah SDM	GHS Bagoto	GMS Bagoto	-do-
40. Awal Noor Khan SDM	GHS Dallan	GHS Mamoon Banda	-do-
41. Saif ur Rehman SDM	GHS Muhammad Khwaja	GHS Muhammad Khwaja	-do-
42. Nazir Ullah SAT,	GHS Muhammad Khwaja	GHS Kotki Bala	-do-
43. Mr. Hidayat Ullah SAT,	GCMHS No.1, Hangu	GMS Barh Abas Khel	-do-
44. Mr Abdur Rehman SAT,	GHS No.2, Hangu	GMS No.2 Hangu	-do-
45. Salih Din SST	GCMHS No.1, Hangu	GMS Samana	-do-
46. Bakhtiar Ahmad Shakir TT	GMS Shamal Din	GMS Torawori	-do-
47. Ijaz Ahmad TT	GCMHS No.1	GHS No.2 Hangu	-do-
48. Abdur Rehman Qari	GHSS Doaba	GMS Doaba	-do-
49. Zia ul Haq Qari	GCMHS No.1, Hangu	GMS Hangu	-do-

**TERMS AND CONDITION:-**

1. They would be on probation for a period of one year extendable for a further period of one year.
2. They will be governed by such rules and regulations as and when issued from time to time by the provincial Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-se seniority remain intact.
6. NO TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in the list of this order will be recovered and if he/she is wrongly promoted, he/she will be reverted.
8. They will be governed by such rules and regulation as many be issued from time to time by government.
9. Their posting will be made on school based they will have to served at the place of posting and their services is not transferable to any other station.
10. Before taking over charge once again their documents may check if they have not the required relevant qualification as per rules they may not be handed over in charge of the post.

Sd/-  
DISTRICT EDUCATION OFFICER  
(MALE) HANGU

Endst. No.3493-3562/SST promotion/Estab Dated Hangu the 31.10.2014  
Copy of the above is forwarded for information and necessary action to tile.

1. Accountant General Khyber Pakhtunkhwa, Peshawar
2. PS to Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.
3. PA to Director Elementary & Secondary Education Department, Peshawar.
4. All principles/Headmasters/ concurred
5. SDEO (Male) Hangu
6. Accountant Middle School Local Office
7. Official concerned.
8. Master File

ATTESTED

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Annex - F



Jalangi

FATA SECRETARIAT I  
 DIRECTORATE OF EDUCATION  
 KPK, WARSAN ROAD PESHAWAR, PAKISTAN  
 NO. 2587-2601  
 DATED 9-3-15  
 F-6 UP GRADATION

MOST IMMEDIATE.

To  
All the Agency Education Officers  
In FATA.

Subject: DEPARTMENTAL PROMOTION FROM THE POST OF SCTS/CT/SDM/DM/SAT/AT/STT/TT&S, QARIESQARIES TO THE POST OF SSTs (BS-16) Regular.

Memo;  
I am directed to enclose herewith the Deputy Director (Estab) Elementary & Secondary Education Khyber Pakhtunkhwa letter No.4954/F.No.SST promotion to SST posts dated 7/8/2014 alongwith criteria on the above noted subject.

Keeping in view the criteria; kindly prepare category wise list (Male/Female) as per below proforma alongwith photo copies of documents of the candidate for promotion against the post of SST for onward submission to the quarter concerned please.

S.No	Name of Teachers	Name of School	Desig;	BPS.	Academic Qualification	Professional Qualification	Date of Ist Apptt; on present post.	Domicile

*Sd/-*  
Deputy Directress (Estab)

Endst;No. 2602-3 / Dated 9-3 2015.

- Copy to;
- Deputy Director (Estab) Elementary & Secondary Khyber Pakhtunkhwa w/r to his letter mentioned above and telephonic discussion with Supdt; (Estab) E&SE Khyber Pakhtunkhwa that the information as per proforma may be checked & necessary guidance may be intimated if any please.
  - P.A to Director Education FATA.

*(\*)*  
**ATTESTED**

*(\*)*  
**ATTESTED**

*(\*)*  
**ATTESTED**  
Deputy Directress (Estab)  
*Sd/-*

- 41 - Govt

GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

Handwritten signature and text in Urdu at the top right.

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

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

Encl. No. & Date as above.

Copy forwarded to:

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

ATTESTED

Handwritten text in Urdu, including a date and a reference number: 03159159555.

ATTESTED (written vertically on the right margin)

Handwritten notes on the left margin: 'Ann x - I', '15', '33', and a circled 'A'.

Better Copy



GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

*Peshawar, dated the November 13, 2012.*

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

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

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.

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- 1. The Director Curriculum & Teachers Education Abbottabad.
- 2. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
- 3. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 4. The Deputy Director Database (E&SE) E&SE Department.
- 5. All District Coordination Officers in Khyber Pakhtunkhwa.
- 6. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
- 7. All District Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers FATA.
- 8. P.S. to Governor, Khyber Pakhtunkhwa.
- 9. P.S. to Chief Minister, Khyber Pakhtunkhwa.
- 10. P.S. to Minister E&SE Khyber Pakhtunkhwa Peshawar.
- 11. Master File.

Section Officer (Primary)

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

**Section Officer (Primary)**



DM(M)

FATA SECRETARIAT  
Directorate of Education  
Warsak Road Peshawar, Pakistan  
Phone. 091-9210166 Fax 091-9210216

No. \_\_\_\_\_  
dated \_\_\_\_/\_\_\_\_/2017

Amx - J

17  
13Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt: of Pakistan Finance Division (Regulation Wing) Notification No.1(32)R-1/2015-582/2016 dated 25.7.2016 Islamabad, SO (Edu) Notification No.FS/SO(Edu)/SSD/Up-Gradation/2882-94 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-60 dated 8.8.2016, the following DM (M) B-15 are hereby promoted to the post of Sr.DM (M) B-16 (Rs.15880-1280-54280) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with effect from 20.2.2013 and further they will be posted in the Govt: Higher Secondary / High Schools by the Agency Education Officer concerned against the newly upgraded Sr.DM BPS-16 posts.

Total No. of DM (M) Posts duly verified by the AAO	78
1/3 share of Senior DM Posts	26
Share of promotion 100%	26
Already promoted to B-16 SDM	Nil
No of Senior DM Posts available for promotion	26
Recommended for promotion to Sr. DM	26

S#	Sen: No.	Name	Name of school	Date of Birth	Date of Apptt: charge as regular DM	Remarks
1	1	Alim Khan	GMS Shakardara	24/12/1957	19/10/1978	Services placed at the disposal of AEO Kurram for further posting.
2	2	Sayed Ali Shah	GMS Yousuf Khel	20/3/1955	10/01/1980	Services placed at the disposal of AEO Kurram for further posting.
3	3	Tahir Ali	GHS Kirman	24/10/1961	10/05/1980	Services placed at the disposal of AEO Kurram for further posting.
4	8	Habib Hussain	GHS Shalozan	18/8/1960	10/01/1982	Services placed at the disposal of AEO Kurram for further posting.
5	10	Muhammad Boshir	GHS Fewar	28/3/1964	10/01/1982	Services placed at the disposal of AEO Kurram for further posting.
6	14	S Mubarak Shah	GMS Karakhela	02/12/1966	09/01/1984	Services placed at the disposal of AEO Kurram for further posting.
7	15	S Basharat Hussain	GHS Bughdi	14/8/1966	09/01/1984	Services placed at the disposal of AEO Kurram for further posting.
8	16	Sayed Hussain	GMS Ali Shar.	26/3/1967	03/01/1986	Services placed at the disposal of AEO Kurram for further posting.

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9	17	Gul Hussain	GHS Zeran	07/09/1960	08/01/1986	Services placed at the disposal of AEO Kurram for further posting.
10	18	Safirullah	GMHS Sadda.	05/09/1966	31/05/1987	Services placed at the disposal of AEO Kurram for further posting.
11	21	Rafiq Hussain	GMS Kharlachi	06/01/1964	14/11/1990	Services placed at the disposal of AEO Kurram for further posting.
12	23	Liaqat Ali	GHS Kharlachi	06/09/1963	20/10/1991	Services placed at the disposal of AEO Kurram for further posting.
13	25	Ghulam Muhammad	GISHS Parachinar	04/01/1968	22/11/1992	Services placed at the disposal of AEO Kurram for further posting.
14	26	Hidayat Hussain	GHS Dilyamine LK	16/04/1962	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
15	27	Qambar Ali	GMS Khomasa	03/11/1970	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
16	28	S Gulfam Hussain	GHS Kirman	02/11/1971	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
17	29	Tajir Hussain	GHS Qubad Shah Khel	01/01/1972	25/12/1993	Services placed at the disposal of AEO Kurram for further posting.
18	30	Mohd Tahir	GMS Arawali LK	12/01/1967	01/09/1994	Services placed at the disposal of AEO Kurram for further posting.
19	31	Rias Khan	GHS Uchat LK.	01/12/1966	01/09/1995	Services placed at the disposal of AEO Kurram for further posting.
20	32	Amir Rehman	GMS Tarai	03/12/1967	01/09/1995	Services placed at the disposal of AEO Kurram for further posting.
21	35	Muhammad Ilyas	GHS Bagan LK.	13/04/1968	25/05/1996	Services placed at the disposal of AEO Kurram for further posting.
22	38	Shaban Ali	GHS Mali Khel	05/04/1971	27/2/1998	Services placed at the disposal of AEO Kurram for further posting.
23	39	Amir Jan	GHS Badama	18/11/1967	20/9/1998	Services placed at the disposal of AEO Kurram for further posting.
24	40	Aziz Ullah	GHS Makhi Zai LK	04/01/1976	20/9/1998	Services placed at the disposal of AEO Kurram for further posting.
25	41	Siraj Ali	GMS Bughaki	04/01/1967	21/9/1998	Services placed at the disposal of AEO Kurram for further posting.

Terms & Conditions:

1. They would be on probation for a period of one year, extendible for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

*Rm*  
**ATTESTED**

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4. Charge report should be submitted to all concerned.
5. Their later due Seniority on the lower post will remain intact.
6. No TA/DA is allowed for joining him/her duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that any over payment is made to him in the light this order will be recovered and if he is wrongly promoted, he will be reversed.

(Hashim Khan)  
Director Education FATA

Endst: No. 4041-4080 /File No.1/Promotion Senior CT B-16 dated 28/12/2017

Copy for information and necessary action is forwarded to the:

1. Accountant General (PR) Sub Office, Peshawar.
2. Agency Education Officer, Kurram Agency.
3. Additional Agency Education Officer Kurram.
4. Agency Accounts Officer, Kurram Agency.
5. PS to Additional Chief Secretary FATA.
6. PS to Secretary SSD, FATA.
7. PS to secretary Finance.
8. PA Director Education, local Directorate.
9. Official concerned.
10. Master File.

(11) Add: Director (Estab)  
Directorate of Education, FATA

*[Signature]*  
**ATTESTED**