

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

Khyber Pakhtunkhwa
Service Tribunal

SERVICE APPEAL NO. 1758/2022

Diary No. **7256**
29/8/23


Islam Badshah, PET (BPS-15) GMS Almas, District Dir
Upper.....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 PAKHATUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO. 1759/2022

Islam Badshah, PET (BPS-15) GMS Almas, District Dir
Upper.....Appellant

VERSUS

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

JOINT PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS No: 1-4.

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 before this Honorable Tribunal.
- 2 ***That*** the appellant has concealed material facts from this Honorable Tribunal in the titled appeal.
- 3 ***That*** the Appellant has not come to this Honorable Court with clean hands.
- 4 ***That*** the appeal is bad for mis-joinder and non-joinder of the necessary Parties.
- 5 ***That*** the appellant is not an aggrieved person within the meaning of Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
- 6 ***That*** the appeal in hand is barred by the law of limitation.
- 7 ***That*** the appellant could not made out his case for promotion as SST in the Department.
- 8 ***That*** the cadre of the appellant has a separate Service Rules Notified on 26-04-2018 for promotion in the upper scales in the Respondent Department.

ON FACTS.

- 1 ***That*** Para-1 is correct that vide Notification dated 10-05-2018, the appellant was appointed against the PET in BPS-15 post on purely contract/temporary bases for the initial period of one year in the Respondent Department. ***(Copy of the appointment order dated 10-05-2018 is attached as Annexure-A).***

- 2 That Para-2 is incorrect as the appellant could not made out his case for promotion as SST in BPS-16 under the policy in vogue in the Notification dated 08-12-2020. *(Copy Notification dated 08-12-2020 is attached as Annexure-B).*
- 3 *That* Para-2 is incorrect as there is a separate service rules notified vide Notification dated 26-04-2018 whereby, the appellant along with his colleagues has been provided fair chances of promotion in the upper scales against the IPE in BS-17, SIPE BS-18 and even again the post of Additional Director (DE&S) in BS-19 in the Respondent Department subject to the condition of Seniority cum fitness of the appellant. *(Copy of the Notification dated 26-04-2018 is attached as Annexure-C).*
- 4 *That* Para-3 is incorrect as the Service Rules dated 13-11-2012 Super ceded by the Current Service Rules dated 26-04-2018 for the cadre of the appellant by the Department. The appellant could not made out his case for promotion as SST under the rules in the Department nor qualify the criteria for promotion in the Department.
- 5 *That* Para-5 is incorrect as no Departmental appeal against the Service Rules dated 24-07-2014 has been filed by the appellant till date.
- 6 *That* Para-6 is incorrect as the appellant has got no cause of action to filed the instant appeal before this Honorable Tribunal therefore, the appeal in hand is liable to be dismissed on the following grounds inter alia:

ON GROUNDS.

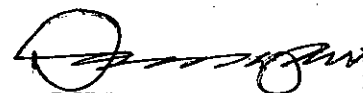
- A. Incorrect & not admitted, the Service Rules dated 24-07-2014 is within legal sphere and liable to maintained in favor of the Department.
- B. Incorrect & not admitted. The plea of the appellant is against the factual position of the case on the grounds that he has a separate service rules notified on dated 26-04-2018 by the Respondent Department.
- C. Incorrect & not admitted. The act of the Department is legal and liable to be maintained.
- D. Incorrect & not admitted, the appellant has been treated as per law, rules & policy by the department in the instant case. However, the plea of the appellant is illegal.
- E. Incorrect & not admitted, the act of the Department with regard to the Notification dated 24-07-2014 is legal.
- F. Incorrect & not admitted. The appellant has been treated as per law rules & policy by the department having not violated the provision of Section-9 of the civil servant Act 1973 read with Rule-7 of APT Rules 1989 in the titled case
- G. Incorrect & not admitted, the act of the Department is not only legal but is also in accordance with the provision of Article 38 (e) of the constitution of 1973.

H. Incorrect & not admitted. As the appellant is not an aggrieved person within the meaning of Article 212 of the constitution 1973, however, the Respondent also seek leave of this Honorable Tribunal to submit additional ground, record of case Law at the time of arguments on the date of hearing.

PRAYER:

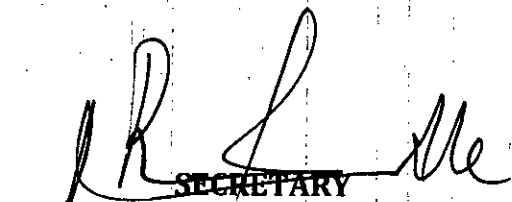
Therefore, in view of the above made submissions, the appeal in hand may kindly be rejected in favor of the Department in the interest of justice.

Dated. ___/___/2023.



DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 4)



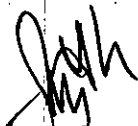
SECRETARY

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



SECRETARY

Govt; to Khyber Pakhtunkhwa
Establishment Department
(Respondent No: 2)



SECRETARY

Govt; to Khyber Pakhtunkhwa
Finance Department.
(Respondent No: 3)

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.



Deponent

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

Service Appeal No: 1758/2022

**Islam Badshah, PET, (BPS-15) GMS Almad, District Dir
Upper.....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





4A - 4 -

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Upper (Phone # 0944-884100) E-mail: deomdirupper@gmail.com

OFFICE ORDER:

In the light of the judgment passed by the Honorable Peshawar High Court Mingora Bench (Daru! Qaza Swat) in Writ Petition No.234-M/2017 dated 25/04/2018, the following candidates are hereby appointed conditionally against the vacant posts of PET BPS-15 (Rs. 16120-1330-56020) plus usual allowances as admissible under the rules on regular basis vide Notification No. 3391-3441/Estt: dated Peshawar the 24/02/2014 with Immediate effect in the interest of public service subject to the following terms and conditions.

S.No	Name	CNIC & Address	School	Remarks
1	Islam Badshah	15701-1237756-9, Darora Dir Upper	GMS Almas	AVP
2	Pass Muhammad	16102-6500690-7, Wari Dir Upper	GHS Matar	AVP

Terms & Conditions:-

1. The appointee will be on probation for a period of one year in term of rule-15(1) of Khyber Pakhtunkhwa (Appointment, Promotion and Transfer (Rules, 1989)).
2. The appointment will be governed by such Rules, regulations policies, which may be prescribed by the Government from time to time.
3. Their services will be considered as on regular basis.
4. The appointees will provide health and age certificate from the medical Superintendent concerned.
5. Appointment is subject to the condition that their certificates/documents must be verified from the concerned authorities, and anyone found producing bogus certificate/s or degree/s their appointment shall be cancelled and they will be reported to the Law enforcing agencies for further legal action.
6. Charge reports should be submitted to all concerned.
7. If the appointee failed to take over charge within 15 days his appointment will be automatically cancelled.
8. No pay etc. is allowed before verification of professional and academics from the concern institutions.
9. Appointees will strictly abide by the terms and conditions laid down therein.

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Attested

Attested

Principal

GMS Almas

School, Darora

Dir Upper

10-25-2018 12:57 PM

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10. They shall not claim any back benefit/seniority as per their affidavit on stamp paper.
11. Their age should not be less than 18 years and above 35 years.
12. Their appointment is subject to the condition of final judgment of the Supreme Court of Pakistan.
13. No TA/DA is allowed.

(ABDULHAQ)
DISTRICT EDUCATION OFFICER (M)
DIR UPPER

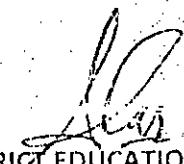
Endst No. 2688-93 F.No.12/DEO (M)/Estb (S)

Dated: 10 / 05 / 2018

Copy forwarder for information to the:-

1. Registrar Honorable Peshawar High Court Mingora Bench.
2. Section Officer CM directives CM Secretariat of Khyber Pakhtunkhwa.
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officer Dir Upper.
5. Principals/Head Master schools concerned.
6. Official concerned.

Amended
10/5/18


DISTRICT EDUCATION OFFICER (M)
DIR UPPER

6

"E" -13-

Promotion to SST of District Malakand

Approved Copy



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. So(B&A)/1-18/E&SE/2012, Dated 11.07.2012 and Finance Department Endorsement No. SO(PR)/FD/10-22(E) dated 16.07.2012, the following SCT/CT, SDM/DM, SAT/AT, ST/TT, S. Qari/Qari and PGHT/SPST/PST are hereby promoted to the posts of SST(G), SST(B/C) and SST(P/M) in BPS-16 (R# 18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions as given below with immediate effects, and further they will be adjusted by the District Education Officer concerned:

A. Promotion to SST (G)

ITEM No.1: PROMOTION of SCT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
40% SCT/CT Promotion Quota Of SST (G)	8
Posts Available for Promotion to SST (G)	4
Proposed SCT for Promotion to SST(G)	7
Deferred of Promotion from SCT/CT to SST (G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular SCT	Qual:	Remarks
1	9	Ahmad Jan	Dheri Kot	02.02.1964	03.03.2013	MA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
2	20	Zahir Shah	GHS Wartair	01.03.1969	03.03.2013	BA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
3	21	Lutf Ullah	GHSS Kot	08.05.1970	03.03.2013	BA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
4	23	Muhammad Rashid	GHS Jolagram	06.02.1972	03.03.2013	BA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
5	25	Sajad Ahmad	GHSS Dheri Jolagram	04.02.1958	03.05.2013	MA M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
6	26	Arsala Khan	GHS No.1 Thano	16.04.1971	03.03.2013	MA M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
7	30	Rukhsar Muhammud	GCMHS Bakhela	04.03.1964	16.03.2013	MA B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.2: PROMOTION of SDM (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
4% SDM/DM Promotion Quota Of SST (G)	0.30
Posts Available for Promotion to SST (G)	1
Proposed SDM/DM for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular SDM	Qual:	Remarks
1	11	Samir Ullah	GHS Meherdi	14.02.1969	21.02.2013	MA DM B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

Approved

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ITEM No.3: PROMOTION of SAT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
4% SAT/AT Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed SAT/AT for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular SAT	Qual:	Remarks
1	9	Abdur Raheem	GHS Nal	01.05.1968	21.02.2013	MA (Arb), M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.4: PROMOTION of STT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
4% STT/TT Promotion Quota Of SST (G)	0.80
Posts Available for Promotion to SST (G)	1
Proposed STT/TT for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular STT	Qual:	Remarks
1	10	Muhammad Nawaz	GHS Naryan Kot	10.04.1987	05.03.2019	BA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.5: PROMOTION of S.Qarl (BPS-15) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
3% S.Qarl/Qarl Promotion Quota Of SST (G)	0.60
Posts Available for Promotion to SST (G)	1
Proposed S.Qarl/Qarl for Promotion to SST(G)	1

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular S.Qarl	Qual:	Remarks
1	2	Muhammad Naeem	GHS No.2 Dargal	09.02.1976	09.02.2013	MA, M.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

ITEM No.6: PROMOTION of PSHT (BPS-15) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (G)	20
25% Share Initial Recruitment Of SST (G)	5
75% Promotion Quota Of SST (G)	15
20% PSHT Promotion Quota Of SST (G)	4
Posts Available for Promotion to SST (G)	4
Proposed PSHT for Promotion to SST(G)	4

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular PST	Qual:	Remarks
1	77	Syed Mujahid Shah	GPS Hero Shah	07.04.1963	26.05.1987	BA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
2	140	Altaf Rahman	GPS Shengral	20.05.1970	15.02.1990	MA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect
3	144	Liaqat Ali	GPS Kharkal	13.03.1964	14.03.1990	M.Sc, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-15, on regular basis with immediate effect
4	145	Aziz Ullah	GPS Arab banda	08.08.1964	14.02.1990	BA, B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(G) in BPS-16, on regular basis with immediate effect

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Promotion to SST (B/C)

ITEM No.1: PROMOTION of SCT/CT MALE TO THE POST OF SST (B/C) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (B/C)	7
25% Share Initial Recruitment Of SST (B/C)	1.75
75% Promotion Quota Of SST (B/C)	5.25
40% SCT/CT Promotion Quota Of SST (B/C)	2.00
Posts Available for Promotion to SST (B/C)	3
Proposed SCT/CT for Promotion to SST (B/C)	1
Deferred of Promotion from SCT/CT to SST (B/C)	

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular CT	Qual:	Remarks
1	166 CT	Muhammad Iqbal	GMS Khushal Garh	12.03.1989	04.03.2015	B.Sc. B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(B/C) in BPS-16, on regular basis with immediate effect

C. Promotion to SST (P/M)

ITEM No.1: PROMOTION of SCT/CT MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (P/M)	4
25% Share Initial Recruitment Of SST (P/M)	2
75% Promotion Quota Of SST (P/M)	6
40% SCT/CT Promotion Quota Of SST (P/M)	3.2
Posts Available for Promotion to SST (P/M)	3
Proposed SCT/CT for Promotion to SST(P/M)	3

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular CT	Qual:	Remarks
1	157 SCT	Raham Qayum	GHS Pir Khel	06.04.1976	05.03.2019	B.Sc (P/M) B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect
2	44 CT	Muhammad Rals Khan	GHS Totakan	03.12.1970	27.07.2015	B.Sc (P/M) B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect
3	165 CT	Ajmal Khan	GHSS Dheri Jolagram	05.03.1984	04.03.2015	B.Sc (P/M) B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect

ITEM No.2: PROMOTION of PSHT/SPST MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of SST (P/M)	2
25% Share Initial Recruitment Of SST (P/M)	2
75% Promotion Quota Of SST (P/M)	6
20% PSHT/SPST Promotion Quota Of SST (P/M)	1.60
Posts Available for Promotion to SST (P/M)	2
Proposed PSHT/SPST for Promotion to SST(P/M)	2

S #	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular PST	Qual:	Remarks
1	479	Rahman Gul	GPS Sharif Abad	15.09.1976	08.11.2004	B.Sc. B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect
2	480	Shams Ul Wahab	GPS Ghangan Abad	10.03.1979	08.11.2004	B.Sc. B.Ed	Services are placed at the disposal of DEO(M) Malakand for further adjustment against the post of SST(P/M) in BPS-16, on regular basis with immediate effect

Terms and Conditions:

- 1) They would be on probation for a period of one year extendable for another one year.
- 2) They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3) Their services can be terminated at any time, in case their performance is found unsatisfactory during the 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-service-Seniority on lower post will remain intact.
- 6) No TA/DA is allowed for joining their duty.

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7) They will give an under-taking to be recorded in their Services-Books to the effect that if any over-payment is made to them in light of this order, will be recovered and if they are wrongly promoted, they will be reversed.
8) Before limiting over charge, their document may be checked. If they have not the required relevant qualification as per rules, they may not be hurried over the change of the post.

(Hafiz Sir, Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl: No. 28999 - 2004
File No. 1/Promotion SST (BPS-16) Dated Peshawar the 8/12/2020

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Malakand
3. District Accounts Officer Malakand
4. Off cials Concerned
5. PS to the Secretary to the Govt. Khyber Pakhtunkhwa E&SE Department
6. PA to the Director, E&SE, Khyber Pakhtunkhwa Peshawar
7. M/A file

Deputy Director (ES/Intr)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Handwritten signature and initials.

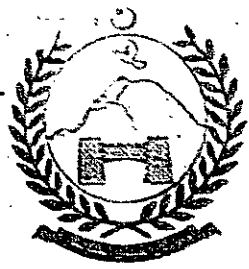
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Number - C

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P/W



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

NOTIFICATION

Peshawar, Dated the 26.04.2018

NOTIFICATION

No.SO(B&A)1-18/2018/DPE Service Rules:- In pursuance of the provision 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 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, for Serial No. 1A, the following shall be substituted in respective columns, namely:

S.No.	Nomenclature of the post.	Minimum Qualification for appointment by initial recruitment or by transfer.	Age limit.	Method of recruitment.
1	2	3	4	5
1A.	Instructor Physical Education (BPS-17)	<p>(i). At least Second Class Master's Degree in Physical Education, with Bachelor of Education (B.ED) or equivalent qualification from a recognized university.</p> <p>(ii). If no suitable candidate possessing the above qualification is available a candidate possessing Master's Degree in the Physical Education may be appointed as an Instructor Physical Education subject to the condition that he shall acquire the qualification of Bachelor of Education (B.ED) within three years from the date of his appointment, failing which his service shall be terminated without notice irrespective of any provision of the rules for the time being enforce.</p>	22-35 years	<p>(a) Seventy percent by Promotion, on the basis of seniority-cum-fitness, from among Senior Physical Education Teacher BPS-16 with at least five years' service as Senior Physical Education Teacher (SPETs) and Physical Education Teacher (PET); provided that if no suitable person is available from amongst Senior Physical Education Teacher (SPETs) for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst the Physical Education Teacher (PETs) with at least five years' service as such having qualification in column No.3.</p> <p>Note: - if no suitable person is available for promotion then by initial recruitment; and</p> <p>(b) Thirty percent by initial recruitment.</p>

(Signature)

Page-1 Continued.

*Attested
Jalal*

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SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA,
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department.
4. The Secretary to Government of Khyber Pakhtunkhwa Public Service Commission.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Secretary, Social Sector FATA Secretariat, Warsak Road, Peshawar.
7. The Directors E&SE, PITE and DCTE Khyber Pakhtunkhwa.
8. The Director Education, FATA Warsak Road Peshawar.
9. The Director FMIU Finance Department.
10. Manager Government Printing Press, Khyber Pakhtunkhwa Peshawar with the request for publication in the next official Gazette.
11. Deputy Director (EMIS) E&SE Department.
12. All the DEOs (M/F) Khyber Pakhtunkhwa.
13. All the Agency Education Officers/ Agency Accounts Officers, FATA.
14. All District Accounts Officers Khyber Pakhtunkhwa.
15. The Section Officer (FR) Finance Department.
16. The Budget Officer-V and X, Finance Department.
17. Assistant Legal Drafter-IV, Govt. of Khyber Pakhtunkhwa Law Department.
18. Section Officer (R-I) Govt. of Khyber Pakhtunkhwa Establishment Department.
19. The Section Officers (S/M/F) E&SE Department.
20. The Section Officer (Primary) E&SE Department.
21. The Section Officer (Lit-I) E&SE Department.
22. The Section Officer (General) E&SE Department.
23. PS to Governor Khyber Pakhtunkhwa.
24. PS to Chief Minister Khyber Pakhtunkhwa.
25. PS to Chief Secretary Khyber Pakhtunkhwa.
26. PS to Minister Education Khyber Pakhtunkhwa.
27. PS to Secretary E&SE Department.
28. PS to Special Secretary E&SE Department.
29. Master File.

Attended
1/1/19


(MURTAZA KHAN)
SECTION OFFICER (BUDGET)