

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 289/2023


Ali Akbar SST BPS-16 GHS No.2 Sakhakot Tehsil Dargae District
Malakand.....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

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JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1, 2 & 3.

Respectfully Sheweth,

The Respondents No. 1-3 submit as under:

PRELIMINARY OBJECTIONS.

- 1 ***That*** the Appellant has got no cause of action.
- 2 ***That*** the appellant is not an aggrieved person within the meaning of Article 212 of the constitution of Islamic Republic of Pakistan.
- 3 ***That*** the appellant has concealed material facts from this Honorable Tribunal.
- 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 matter in hand is barred by law in view of the law of limitation Act 1908.
- 7 ***That*** the case is bad for mis-joinder and non-joinder of the necessary parties.
- 8 That the impugned Notification dated 22-02-2019 is within legal parameter and liable to be maintained in favor of the Department.
- 9 That the appellant is not entitled for promotion to the post of SST (B/C) BPS-16 w.e.f 28-10-2014 instead of w.e.f 22-02-2019.
- 10 That no Departmental Appeal has been filed by the appellant to the appellate authority against the Notification dated 22-02-2019 by the appellant, hence, got finality under the law.

ON FACTS.

- 1 That Para-1 is pertain to the service record of the appellant against the CT post appointed vide Notification dated 07-10-1989 attached as *Annexure-A*.
- 2 That Para-2 is also pertains to the service record of the appellant against the SCT in BPS-16 (P) promoted vide Notification dated 21-02-2013 attached as *Annexure-B*.
- 3 That Para-3 is correct that vide Notification dated 28-10-2014, the Respondent was allowed promotions & the eligible candidate full filling the criteria of seniority cum fitness by leaving the appellant on the grounds that he could not made out his case for promotion in the above Notification dated 28-10-2014, and due to the lack of prescribed length of service and even seniority cum fitness in the Respondent Department for his promotion to the post of SST (B/C) BPS-16 with reference to the Notification NO. SO (PE)/4-5/SSRE/meeting/2013/Teaching Cadre dated 24-07-2014. *(Copy of the Notification dated 28-10-2014 is Annexure-C)*.
- 4 That Para-4 is incorrect as no Departmental Appeal has been filed by the appellant against the Notification dated 28-10-2014 by the appellant to the appellate authority, hence, got finality against the appellant under the rules.
- 5 That Para-5 is correct that vide Notification dated 22-02-2019, the appellant has been promoted to the post of SST (B/C) BPS-16 on the basis of his seniority under section-8 of Civil Servant Act 1973 and fitness basis in the Respondent Department. *Copy of the Notification dated 22-02-2019 is attached as Annexure-D*.
- 6 That para-6 is also incorrect as no Departmental Appeal against the Notification dated 22-02-2019 has been filed by the appellant till date, hence, got finality under the Law & Limitation Act 1906 against the appellant therefore the appeal in hand is liable to be dismissed on the following grounds inter alia:

ON GROUNDS.


- A. **Incorrect & not admitted**, the Notification dated 22-02-2019 is in accordance with Law, Rules and promotion policy in terms of reserved quota notified vide Notification dated 24-07-2014.
- B. **Incorrect & not admitted**. The act of the Department with regard to the Notification dated 22-02-2019 is in line with the provisions of Articles 4 & 25 of the constitution of 1973.


- C. **Incorrect & not admitted.** The appellant was not in the promotion zone and criteria in terms of the promotion policy dated 24-07-2014 at the time of the issuance of the Notification dated 28-10-2014 by the Department.
- D. **Incorrect & not admitted,** the plea of the appellant is against the facts and policy under reference, hence, denied.
- E. **Incorrect & not admitted,** the Notification dated 22-02-2019 is in accordance with the provisions Section-9 of Civil Servant Act 1973 and even Rules-7 of APT Rules 1989.
- F. **Incorrect & not admitted.** The appellant is not entitled for promotion as SST (Bio/Chm) BPS-16 post w.e.f. 22-02-2019 in view of his seniority cum fitness in the Department.
- G. **Incorrect & not admitted,** the appellant has no valid case of action to file the titled appeal before this Learned Tribunal. Therefore, the Respondents No. 1-3 also seek leave of this Honorable Tribunal to submit additional record grounds and case law on the date fixed.

PAYERS:

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. 08/05/2023.


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


DIRECTOR
 E&SE Department Khyber
 Pakhtunkhwa, Peshawar.
 (Respondents No: 2 & 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: 289/2023

Ali Akbar SST BPS-16 GHS No.2 Sakhakot Tehsil Dargae District
Malakand.....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.



[Signature]
Deponent

4/9/2023

"A" - 4 -

4

OFFICE OF THE DIRECTOR OF EDUCATION (S) MALAKAND DIVISION SAIDU SHARIF, AT GUL KADA SWAT.

APPOINTMENT.

Mr. Ali Akbar S/O Sahib Shah
resident of Village Kaper District Malakand Agency hereby
temporarily appointed against CT Post at Ime Derge
in EPS No. 9 of Rs. 831 P.M. Fixed plus usual allowances as due
and admissible to him/her under the rules with effect from the date of his/her
taking over charge in the interest of public service subject to the following
terms & conditions:-

TERMS & CONDITIONS:-

- 1- No T.A./D.A. is allowed.
- 2- Charge reports should be submitted to all concerned.
- 3- The appointment is made on purely temporary basis and liable to termination at any time without notice and assigning any reason. In case of resignation he will submit one month's prior notice to the Department for forfeit one month's pay in lieu thereof if to the Gov.
- 4- The Candidate shall produce his/her health and age certificates from the Civil surgeon concerned in case he/she is not already in service.
- 5- The Heads of the Institutions are required to check the original academic/Professional Certificates of the Candidate before handing over charge to him/her.
- 6- In Case the Candidate failed to take over charge within 15 days of the issue of this order, his/her appointment shall stand automatically cancelled.
- 7- The Candidate shall not be handed over charge if his/her age exceed 33 years or below 18 years.

Gulam
DIRECTOR OF EDUCATION,
MALAKAND DIVISION
AT GUL KADA SWAT.

Enclt: No. 579/6-2/

Dated 7/10 1989.

Copy forwarded to:-

- 1- The Distt. Education Officer (M) Malakand Agency
- 2- The S.D.E.O. (M) Sam Raniza
- 3- The Headmaster/Headmistress. Ime Derge
- 4- The Candidate concerned.
- 5- The Advisor to Hon. Chief Minister for Edu: NW F.P. w/r to his order dated 28.8.89.
- 6- The Special Asstt. to the Hon. Chief Minister, NW F.P. w/r to his order dated 29.8.89.

Moh
for/ DIRECTOR OF EDUCATION,
MALAKAND DIVISION
AT GUL KADA SWAT.

Taj Mohammad/

A

Ali Akbar
Ime Derge



"B"

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/SSP/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts:-

Total No. of CT (M) Posts duly verified by the DAO	373
1/3 share of Senior CT Posts	124
Share of promotion 100%	124
Promoted to the post of Senior CT B-16	123
Deferred for Promotion	01

S.N No.	S.L. No.	Name	Place Of Posting	Date of Birth	Remarks
1	2	Ihsanullah Khan	GIS Dargai No.1	06/01/1954	Services placed at the disposal of DEO Malakand for further posting.
2	3	Saidul Abrar	GIS Talai	03/08/1962	---Do---
3	4	Muhammad Qasim	GIS Totakan	28/02/1962	---Do---
4	5	Balshah Mimir	GIS Wartair	01/07/1960	---Do---
5	6	Farhad Khan	GIS Hero Shah	01/07/1959	---Do---
6	7	Muhammad Younas	GIS Totakan	20/04/1961	---Do---
7	8	Mimir Khan	GHS Agra	01/10/1959	---Do---
8	9	Saeed Ahmad	GIS Sakhat No.1	02/01/1958	---Do---
9	10	Aslam Khan	GIS Qilangi	19/06/1955	---Do---
10	11	Gul Wazir	GHS Inzarai	03/05/1960	---Do---
11	12	Sarfraz Khan	GHS Talai	15/07/1960	---Do---
12	13	Hikmat Shah	GHS Sakhat No.1	25/02/1956	---Do---
13	15	Muhammad Wali	GMS Glinda Bala	20/08/1959	---Do---
14	16	Muhammad Ali Khan	GHS Sakhat No.1	12/12/1965	---Do---
15	17	Hamid Ullah	GHS Wartair	08/12/1956	---Do---
16	18	Rahim Ullah	GHS Totakan	05/05/1962	---Do---
17	19	Shah Muhammad	GHS Nadrangal	30/01/1954	---Do---
18	20	Samitullah Khan	GHS Dargai No.2	04/01/1959	---Do---
19	21	Ahul Wahid	GHS Thana No.1	01/01/1965	---Do---
20	22	Musa Khan	GIS Sakhat No.1	12/12/1955	---Do---

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100% Share of promotion's Posts available for promotion Proposed for Promotion

67	69	Muhammad Akbar	GHS Pie Khel	01/01/1963	---Do---
68	70	Lutfur Rahman	GHS Garhi Usmani-Khel	20/01/1965	---Do---
69	71	Badshah Khan	GHS Palat	01/03/1962	---Do---
70	72	Muhammad Azam Khan	GHS Sakhat Kot No.2	20/02/1965	---Do---
71	73	Iftikhar Ahmad	GHS Bakhela No.3	01/09/1960	---Do---
72	74	Muhammad Saleem	GMS Pinda Kailora	01/01/1959	---Do---
73	75	Muhammad Qayim	GHS Dargai	09/01/1965	---Do---
74	76	Salim Ahmad	GMS Ghinda Bala	20/03/1959	---Do---
75	78	Amir Ghazan	GHS Dargai No.1	31/03/1967	---Do---
76	79	Sher Bahadar	GMS Ghaur Kalay	09/01/1961	---Do---
77	80	Usman Ali	GMS Dawa Khan Kill	04/03/1959	---Do---
78	81	Muhammad Akbar	GHS Kot	01/01/1959	---Do---
79	82	Saleem Khan	GHS Sakhat Kot No.1	06/03/1961	---Do---
80	83	Eyranq Shah	GHS Sakhat Kot No.1	03/08/1959	---Do---
81	84	Jauaid Ul Haq	GHS Sakhat Kot No.1	28/03/1967	---Do---
82	85	Haq Nawaz	GHS Sakhat Kot No.1	15/01/1954	---Do---
83	86	Hussain Shah	GHS Kharki Dhari	21/05/1951	---Do---
84	87	Amir Naveed	GHS Badragga	01/01/1961	---Do---
85	88	Nour Ul Wahab	GHS Garhi Usmani Khel	22/06/1963	---Do---
86	89	Muhammad Ayaz	GHS Badragga	01/02/1967	---Do---
87	90	Fazli Aleem	GHS Thana No.1	02/09/1971	---Do---
88	91	Mian Ghafar	GHS Sakhat Kot No.2	06/01/1968	---Do---
89	92	Ihsan Ul Haq	GHS Sakhat Kot No.1	03/01/1970	---Do---
90	93	Wahab Gul	GHS Kot	04/03/1971	---Do---
91	94	Jamal	Gemhs Bakhela	02/01/1965	---Do---
92	95	Bakht Zamin	Gemhs Bakhela	18/01/1970	---Do---
93	96	Muhammad Dawood	GHS Kot (Central)	12/10/1968	---Do---
94	97	Sher Bahadar	GHS Gul Muqam	01/08/1967	---Do---
95	98	Bakht Sultan	GHS Tolai	07/02/1968	---Do---
96	99	Asfandyar	GHS Thana No.1	10/01/1967	---Do---
97	100	Muhammad Riaz	Gemhs Bakhela	03/12/1966	---Do---
98	101	Rahim Dad Khan	GMS Naray Targay	01/01/1959	---Do---
99	102	Ibrahim Ullah	Gemhs Bakhela	01/01/1961	---Do---
100	103	S Alta Ur Rehman	GMS Akbar Abad	17/01/1961	---Do---
101	104	Said Akbar	GHS Melkhaid	02/02/1961	---Do---
102	105	Rahmat Ullah	GMS Akbar Abad	03/10/1964	---Do---
103	106	Ali Akbar	GHS Sakhat Kot No.1	10/01/1961	---Do---
104	107	Muhammad Tahir	GHS Dargai No.1	06/01/1964	---Do---
105	108	Said Mehmood	GHS Kot	01/12/1965	---Do---
106	109	Muhammad Asghar	GHS Dhari Aladand No.1	03/03/1965	---Do---
107	110	Zakavallah	GHS Ce Thana	13/04/1967	---Do---
108	111	Nourel Islam	GHS Thana No.1	27/03/1962	---Do---
109	112	Zakir Shah	GHS Wartair	03/01/1969	---Do---
110	113	Fazal Karim	GHS Pinda	01/01/1960	---Do---
111	114	Ihsan Ullah Khan	GHS Nul	04/01/1972	---Do---
112	115	Lutfullah	GHS Kot	05/01/1970	---Do---

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113	117	Zakir Hussain	GHIS Dhari Alindand No.1	15/04/1962	---Do---
114	118	Mohammad Rashid	GHIS Dhari Julagran	02/06/1972	---Do---
115	119	Zakir Hussain	GHS Palai	15/02/1968	---Do---
116	120	Sajjad Ahmad	GHSS Dhari Julagran	02/04/1968	---Do---
117	121	Arsala Khan	GHIS Thana No.1	16/04/1971	---Do---
118	122	Syed Anwar Shah	GHIS Sakhalat No.1	15/04/1959	---Do---
119	123	Jhangraz Khan	GHIS Khar	10/04/1960	---Do---
120	124	Muhammad Riaz	GHIS Thana No.1	03/02/1968	---Do---
121	125	Sher Ghani	GHIS Kapar	04/06/1955	---Do---
122	126	Aurang Zeb	GHS Thana No.1	18/01/1962	---Do---
123	127	Fuzli Hachi	GMS Kama Agra	18/03/1960	---Do---

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 his performance is found unsatisfactory during probationary period. In case of misconduct, he 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 on lower post will 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 in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Reza Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

4586-92

Encl: No. / File No./Promotion Senior CT B-16: Dated Peshawar the 21/02/2013.

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) Malakand
3. District Accounts Officer Malakand
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa ESSS, Department.
6. PA to the Director ESSS Khyber Pakhtunkhwa, Peshawar.
7. M/ file

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

SSS Phy-Mat
Initial recruitm
Promotion.
Promotion c
le for promot
Promotion



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

"C"
8-

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned on "School based".

A. SST (Bio-Chem)

1. PROMOTION OF SCT/CT TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	17
25% share initial recruitment	04
75% share for Promotion.	13
40 % Share of promotion of SCT/CT	07
Posts available for promotion	07
Promoted through this order	07

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	92	Ihsan Ul Haq	GHS Sakhakot No.1	1-Mar-70	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post on school based.
2	94	Jamal	GCMHS Batkhela	1-Feb-65	-----do-----
3	107	Muhammad Tahir	GHS Dargai No.1	1-Jun-64	-----do-----
4	109	Muhammad Asghar	GHS Dheri Aladand No.1	3-Mar-65	-----do-----
5	131	Ghulam Muhammad	GHS Chahi Usutani Khel	11-Mar-61	-----do-----
6	182	Umar Buz	GHS Sakhakot No.2	12-Jun-67	-----do-----
-	211	Qayum Shah	GHS Sakhakot No.1	10-Mar-70	-----do-----

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	17
25% share initial recruitment	04
75% share for Promotion.	13
20 % Share of promotion of PSHT/SPST/PST	03
Posts available for promotion	03
Promoted through this order	03

S.No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	111	Hassan Idrees	GPS Jharaei	07/04/1971	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post on school based.

Abdul Qadir
3

412	Hussain Idrees	GPS Sakhakot No. 2	07/04/1971	-----do-----
011	Noor Almuhammad	GPS Gul Muqam	20/12/1969	-----do-----

3. PROMOTION OF SDM/DM TO THE POST OF SST (BIO-Chem) BPS-16

Total No. of SST Bio-Chem (M) Posts vacant Posts	17
25% share initial recruitment	04
75% share for Promotion.	13
4 % Share of promotion of SDM/DM	01
Posts available for promotion	01
Promoted through this order	01

S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
51	Muhammad Latif	GHS No.1 Dhari Allahdand	5-Mar-73	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post on school based.

B. SST (Phy-Maths)

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

Total No. of SST Phy-Maths (M) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
40 % Share of promotion of SCT/CT	03
Posts available for promotion	03
Promoted through this order	03

S. No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	80	Muhammad Ayoob	GHS Badragga	2/03/1967	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Phy-Maths) post on school based.
2	95	Bakht Zamin	GUMHS Bakhela	18/01/1970	-----do-----
3	97	Sher Bahadar	GHS Gul Muqam	8/04/1967	-----do-----

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (Phy-Maths) BPS-16.

Total No. of SST Phy-Maths (M) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
20 % Share of promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Promoted through this order	02

S. No	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	484	Zahid Hussain	GPS Palai Khpa	9/1/1967	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Phy-Maths) post on school based.
2	485	Bakht Rawan	GPS No. 1 Sakhakot	5/1/1968	-----do-----

Abdullah
Jan 3

3. PROMOTION OF SDM/DM TO THE POST OF SST (Phy-Maths BPS-16) -10-

Total No. of SST Phy-Maths (M) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
4 % Share of promotion of SDM/DM	01
Posts available for promotion	01
Promoted through this order	01

S. No	S.L.N	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	53	Ghulam Hassan	GMS Shingrai	05/02/1972	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Phy-Maths) post on school based.

C. SST (General)1. PROMOTION OF SCT/CT TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	06
25% share initial recruitment	02
75% share for Promotion.	04
40 % Share of promotion of SCT/CT	02
Posts available for promotion	02
Promoted through this order	02

S.N	S.L.N	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	6	Farhad Khan	GHS Hero Shah	07/01/1959	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post on school based.
2	7	Muhammad Younas	GHS Totakan	20/04/1961	-----10-----

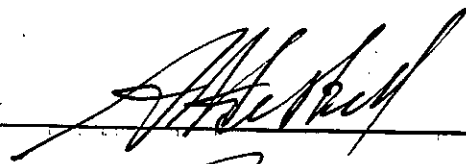

2. PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	6
25% share initial recruitment	2
75% share for Promotion.	4
20 % Share of promotion of PSHT/SPST/PST	1
Posts available for promotion	1
Promoted through this order	1

S.N	S.L.N	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	104	Noshad Khan	GPS Zormandi	6/3/1967	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post on school based.

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 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 on lower post will 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 in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.



H/-

SST's (M) Malakund

- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based, They will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

232690

Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 28/08/2014.
Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned
3. District Accounts Officer concerned
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

M. Rafiq Khattak
28/08/14



Directorate of Education
Khyber Pakhtunkhwa, Peshawar

SSTs (M) Malakand

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17/11

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(PE)/4-5/SSRC/Meeting/2019/Teaching Cadre dated 27th July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

A. SST (Bio/Chem)

1. Promotion to Senior CT/CT to SST (Bio/Chem) BPS-16

Total No. of vacant Posts of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion	05
40 % Share of promotion of SCT/CT	03
Posts available for promotion	03
Proposed for Promotion	01
Recommended for promotion	01
Balance	02

S.I.	Name of Official & Present Place	Date of Birth	Date of Appoint. as Regular CT	Qualification	Remarks
1	Ali Far Khan Sikri Sakhar	1/10/1964	10/10/1989	MSE/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post.

2. Promotion of PSHT/SPST/PST to SST (Bio/Chem) BPS-16

Total No. of vacant Posts of SST (Bio-Chem)	07
25% share initial recruitment	02
75% share for Promotion	05
20 % Share of promotion of PSHT/SPST/PST	02
Posts available for promotion	02
Proposed for Promotion	02
Recommended for promotion	02

S.I. No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint. as Regular PST	Qualification	Remarks
1	Umefa Khan GPS Shawo Kalmi	19/1/1976	1/1/2004	BS/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (Bio-Chem) post.
2	Javed Iqbal GPS No.2 Dargal	12/1/1980	18/7/2011	BS/B.Ed	do

B. SST (Phy-Maths)

1. PROMOTION OF SCT/CT TO SST (Phy-Maths) BPS-16

Total No. of SST Phy-Maths (M) Posts vacant Posts	09
25% share initial recruitment	02
75% share for Promotion	07
40 % Share of promotion of SCT/CT	04
Posts available for promotion	04
Proposed for Promotion	02

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SSTs (M) Malakand 3

Mun Ghafur	6/3/1968	27/4/1992	MA/M.Ed	do
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PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
20% Share of promotion of PSHT/SPST/PST	05
Posts available for promotion	05
Proposed for Promotion	05
Recommended for promotion	05

S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular PST	Qualification	Remarks
	Amir Zaman GPS Falsul Abud (Toukani)	4/3/1960	4/11/1979	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.
	Muhammad Ifticah GPS Kanwal (Agra)	5/3/1964	10/10/1982	BA/B.Ed	do
	Zahoor Ahmad GPS No.2 Dargal	13/4/1968	1/11/1987	BA/B.Ed	do
	Shahid Ali GPS Ghawar Kaly	10/4/1969	1/11/1987	BA/B.Ed	do
	Amrullah Kaly	10/7/1966	11/3/1985	BA/B.Ed	do

PROMOTION OF SDM/DM TO SST (General) BPS-16

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
04% Share of promotion of SDM/DM	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular DM	Qualification	Remarks
	Irfan Ullah CHS Badroga	30/3/1964	1/12/1988	BA/B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.

PROMOTION OF SAT/AT TO SST (General) BPS-16

Total No. of vacant Posts of SST (General)	24
25% share initial recruitment	06
75% share for Promotion.	18
04% Share of promotion of SAT/AT	01
Posts available for promotion	01
Proposed for Promotion	01
Recommended for promotion	01

S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular AT	Qualification	Remarks
	Sarbiland Khan	12/7/1972	14/5/1992	MA/B.Ed	Services placed at the disposal of

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		SSTs (M) Malakand 4	
GHS Haryana Kai		DEO (M) Malakand for further posting against SST (General) post.	
5. Promotion of STT/TT to SST (General) BPS-16			
Total No. of vacant Posts SST (General)		24	
25% share initial recruitment		06	
25% share for Promotion.		16	
04 % Share of promotion of STT/TT		01	
Posts available for promotion		01	
Proposed for Promotion		01	
Recommended for promotion		01	

S. No	S.I. No	Name of Official & Present Place of Posting	Date of Birth	Date of Appointments Regular TT	Qualifications	Remarks
	11	Muhammad Fayaz GHS, HK	15/6/1970	17/5/1993	MA /B.Ed	Services placed at the disposal of DEO (M) Malakand for further posting against SST (General) post.

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 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 on lower post will 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 in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9. Their posting will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- 10. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
 Director
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

Encls: No. 4627-32 / File No. 2/Promotion SST B-16: Dated Peshawar the 22/11/2019
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2. District Education Officer (M) Malakand.
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Dy: Director (Esic)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

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DIRECTORATE ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Belhammad Khan Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 289/23 titled Abi Akbar vs Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated . . . / . . . / 2023


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.