

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _ 1707/2023

Dalil Shah..... APPELLANT

VERSUS

Secretary E&SED KPK Peshawar & Others.....RESPONDENTS

INDEX

| S.NO | DESCRIPTION OF DOCUMENTS | ANNEXTURE | PAGES |
|------|-------------------------------|-----------|-------|
| 1. | Comments | | 1-2 |
| 2. | Affidavit | | 3 |
| 3. | Authority Letter | | 4 |
| 4 | Withdrawal / Adjustment Order | A | 5 |
| 4 | Promotion Policy 2012 | B | 6-19 |


DISTRICT EDUCATION OFFICER (M),
District ORAKZAI



BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 1707/2023

Mr. Dalil Shah.....Appellant.

VERSUS

Secretary E & SE Department & Others.....Respondents.

Para-wise comments on behalf of respondents No:1, 2 & 3.

Respectfully Sheweth:

Preliminary Objection

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7828

Dated 25/9/23

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appellant has been treated as per rules and policy in-vogue.
7. That the promotion withdrawal order dated 19-5-2023 is within legal parameters and is according to the rules / policy.
8. That the instant appeal is filed on mala fide intentions just to exert illegal pressure on the respondent department.

On Facts:

1. No comments. Pertains to record.
2. No comments. Pertains to record.
3. That para-3 is correct to the extent of promotion of PSTs to the post of CT's mistakenly by the Respondent 3, however the same promotion was withdrawn / recalled vide order dated 19-5-2023, under the rules. It may be mentioned here that there is no rules / policy of promotion of PST teacher to the post of CT. **(Withdrawal order dated 19-5-2023 and promotion policy are attached as Annex-A & B)**
4. That detail reply has been submitted under para-3 above, as stated that there is no provision of promotion from PST to CT in rules / policy.
5. Detail reply has already been submitted under para- 3 & 4 above.
6. Detail reply has already been submitted under para- 3 & 4 above.
7. That as stated in above paras, that there is no provision of promotion from PST to CT in rules / policy.
8. No, comments, pertains to record.
9. Pertains to record, however as stated above, that that there is no provision of promotion from PST to CT in rules / policy.
10. That para-10 is incorrect, the appellant has no right to file such appeal, however the respondent department also submit on following grounds inter alia.

Grounds:

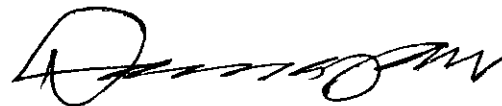
- A. **Incorrect & denied:** the appellant has been treated as per rules and policy, the appellant is just exerting illegal pressure on the respondent department by filling the instant appeal.
- B. **Incorrect & denied:** As stated that there is no rules / policy of promotion of PST teacher to the post of CT.
- C. **Incorrect & denied:** The appellant has been dealt in accordance with law/rules as no one is allowed to violate the Government rules/regulation, furthermore, there is no rules / policy of promotion of PST teacher to the post of CT.
- D. **Incorrect & denied:** Detail reply has already been submitted in the above paras.
- E. **Incorrect & denied:** All Government employees are bound to perform their duties according to law/rules/instructions given by the Government from time to time in the interest of public.
- F. **Incorrect & denied:** The appellant has been treated by applying the rules / policy in vogue and just exerting illegal pressure on the respondent department on ill well.
- G. **Incorrect & denied:** Detail reply has already been submitted in above paras.
- H. The respondents seek leave to raise additional ground at the time of arguments.

Prayer

In light of the above fact, it is humbly prayed that the appeal may very kindly be dismissed in favor of the Respondent Department.



**Secretary E & SE Khyber Pakhtunkhwa
(Respondent No.1)**



**Director E & SE Khyber Pakhtunkhwa
(Respondent No.2)**



**District Education Officer (M)
(Respondent No.3)**

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No._ 1707/2023

Dalil Shah..... APPELLANT

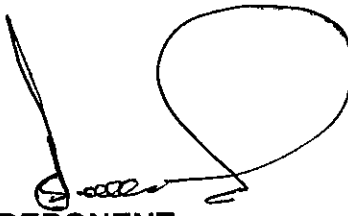
VERSUS

Secretary E&SED KPK Peshawar & Others.....RESPONDENTS

AFFIDAVIT

I, **Mr. Asad Ullah SDEO (BPS-17) Focal Person for Litigation-Orakzai Elementary & Secondary Education Department**, do hereby solemnly affirm and declare that the contents of the accompanying compliance Report, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

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

Asad Ullah
SDEO (Lower)/Litigation, Orakzai
CNIC: 14101-1426407-9
MOBILE NO.0333-9671304



**OFFICE OF THE DISTRICT EDUCATION OFFICER(Male)
DISTRICT ORAKZAI**

District H/Q Kohat Road Babar Mela at Hangu.
Phone # 0925-690017 Fax # 0925-690017
Email: deorakzai2020@gmail.com



Service Appeal No._ 1707/2023

Dalil Shah..... APPELLANT

VERSUS

Secretary E&SED KPK Peshawar & Others.....RESPONDENTS

AUTHORITY LETTER

It is certified that Mr. Asad Ullah SDEO Lower Orakzai (BPS: 17) Focal Person Litigation of this office is hereby authorized to appear before the Khyber Pkahtunkhwa Service Tribunal, Peshawar on dated 14th September, 2023 positively.

**DISTRICT EDUCATION OFFICER (Male),
District ORAKZAI**



OFFICE OF THE DISTRICT EDUCATION OFFICER- (M)-ORAKZAI
DISTRICT HEADQUARTER ORAKZAI AT BABER MELA-HANGU
 Phone # 0925-690017 Fax # 0925-690017
 Email: deoorakzai2020@gmail.com



No. 1411 Dated 19/05/2023

OFFICE ORDER:

In compliance of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar vide letter bearing No. 18811, dated 11-04-2023, the competent authority DEO (M) Orakzai is pleased to withdraw the promotion orders bearing Endst: No. 6660, dated 10-12-2020 in respect of the following twenty four promoted PSTs in BPS: 12 to the posts of CTs in BPS: 15 in District Orakza of the promotion order ibid. Furthermore, the following teachers are hereby adjusted in the schools mentioned against their names with immediate effect.

5

| S# | NAME | CURRNT PLACE OF POSTING | PLACE OF ADJUSTMENT |
|-----|---------------------|--------------------------|--|
| 1. | Iqbal Hussain | GMS Star Sam | GPS Bara Mela |
| 2. | Khaista Jan | GMS Safri Feroz Khel | GPS Stara Kada |
| 3. | Muhammad Yaqoob | GMS Yakho Kandow | GPS Sarki Khel |
| 4. | Muhammad Hanif | GHS Mishti Bazar | GPS Bada Sheikhan |
| 5. | Naseeb Rehman | GMS Babra Laaki | GPS Gul Cheri |
| 6. | Gul Karim | GMS Safri Feroz Khel | GPS Ghutak Ali Khel |
| 7. | Dalil Shah | GHS Bazid Khel | GPS Rangin Khel |
| 8. | Mati Ur Rehman | GHS Avi Mela | GPS Dago Takhtak |
| 9. | Gul Rahim | GHS Gulistan | GPS Khee Kada No.1 |
| 10. | Ashfaq Ali | GMS Khalil Sepoy | GPS Bal Kot |
| 11. | Maskeen Khan | GMS Damber Lasti | GPS Dran Sheikhan |
| 12. | Syed Khadim Hussain | GHSS Andkhel | GMPS Shamer |
| 13. | Raees Akbar | GMS Wampanra | GPS Kagnai Sher Khel |
| 14. | Hussain Asgher | GMS Khalil Sepoy | GPS Khar Khushta |
| 15. | Minawar khan | GHS Saifal Darrah | GPS Arkhio Killi |
| 16. | Shiren Hassan | GMS Mirako Payan | GPS Suleman Khel |
| 17. | Amjad Khan | GMS Zanka Khel | GPS Taghnai |
| 18. | Saqib Ul Islam | GHS Jarma District Kohat | Will be adjusted as and when the inter district transfer is withdrawn by the Directorate of Elementary & Secondary Education Khyber Pakhtun Khwa |
| 19. | Amir ur Rehman | GHS Swaro Kot | GPS Swaro Kot |
| 20. | Hikmat Khan | GHS Swaro Kot | GPS Khadzai No.1 |
| 21. | Munawar Khan | GHS Chapper Mishti | GPS Zor Chapper |
| 22. | Muhammad Ghani | GMS Stara Kada | Kot Ali Khel |
| 23. | Painda Khan | GHS Baghnak | Ghutak Ali Khel |
| 24. | Israfil Khan | GMS Dana Khula | GPS Taropi Ali Khel |

Note:

- 1) Fresh charge report in their original Basic Pay Scales as on 09-12-2020 should be submitted to all concerned within 15 days positively. In case of failure/refusal, they will be treated under the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011.
- 2) TADA is not allowed for joining of their duties.

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

Copy of Even No. & Date:

Copy forwarded for information and necessary action to the:-

- 1) Director Elementary and secondary Education Khyber Pakhtunkhwa Peshawar with the request to withdraw inter District transfer order in r/o S# 18, already transferred to District Kohat vide Directorate of E&SE KP No. 13656-61/F.No 51 Transfers Dated Peshawar the 27/12/2022.
- 2) Additional Director (Estab), Directorate of E&SE, MAs, Peshawar.
- 3) District Education Office (M), District Kohat
- 4) District Monitoring Officer, EMA, District Orakzai.
- 5) District Accounts Officer, District Orakzai.
- 6) Deputy DEO (M), Orakzai.
- 7) Assistant Director (Estab), Directorate of E&SE, KP, Peshawar vide his office letter quoted above.
- 8) Principal/Head Masters/Incharge HM and Head Teachers concerned.
- 9) SDEOs concerned for further necessary action.
- 10) Superintendent/Pay Clerk O/O the DEO (M) Orakzai for further necessary actions.
- 11) Focal Person (HRMIS) for necessary action.
- 12) PSTs concerned
- 13) Office Copy

DISTRICT EDUCATION OFFICER (MALE)
 DISTRICT ORAKZAI

New policy

P# 07, 11

Dated 06/08/2020

6

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.SO(PE)4-5/BSRC/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.

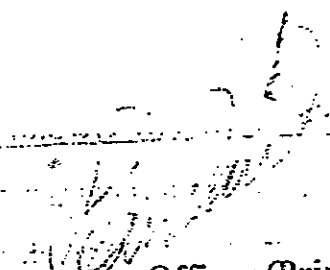
SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

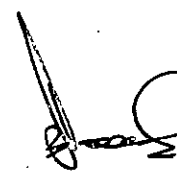
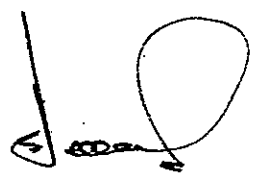
Endst. No. & Date as above.

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.
7. The Director Education (FATA), 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 FATA.
15. All Agency Education Officers 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.

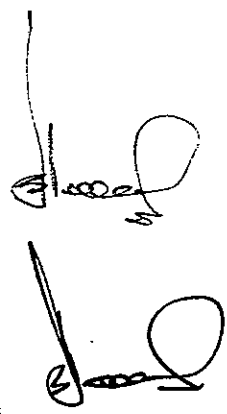

Section Officer (Primary)

⑦

APPENDIX

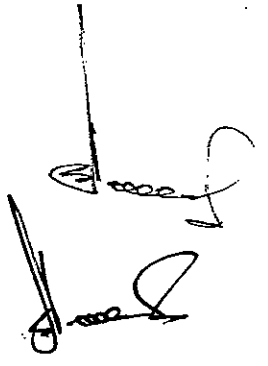
| S.No. | Nomenclature of the post. | Minimum qualification and experience for initial appointment or by transfer. | Age limit. | Method of recruitment. |
|-------|------------------------------------|--|-----------------|--|
| 1. | 2. | 3. | 4. | 5. |
| 1. | Secondary School Teacher (BPS-16). | <p>(i) Second class Bachelor's Degree with two subjects, as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or</p> <p>(ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.</p> | 18 to 35 years. | <p>(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:</p> <p>(i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> |



9

| | | | | |
|----|---|--|---|--|
| | | | | <p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p> |
| 2. | Senior Arabic Teacher (SAT) (BPS-16) | | - | By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher. |
| 3. | Senior Theology Teacher (STT) (B-16). | | - | By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher. |
| 4. | Senior Certified Teacher (SCT)(General) (BPS-16). | | - | By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General). |

| | | | | |
|----|---|--|--|---|
| | Senior Certified Teacher (Industrial Arts) (BPS-16). | | | By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts). |
| 6. | Senior Certified Teacher (Agriculture) (BPS-16). | | | By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture). |
| 7. | Senior Drawing Master (BPS-16). | | | By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master. |
| 8. | Senior Certified Teacher (SCT) (Home Economics) (BPS-16). | | | By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics). |
| 9. | Senior Physical Education Teacher (BPS-16). | | | By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher. |



| | | | | |
|-----|--|--|-----------------|--|
| 10 | Arabic Teacher (AT) (BPS-15). | (i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatuatul Wafaqul Madaris: or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University. | 20 to 35 years. | By initial recruitment |
| 11. | Theology Teacher (TT) (BPS-15). | (i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University. | 20 to 35 years. | (a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment. |
| 12. | Senior Qari (BPS -15). | | | By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment. |
| 13. | Certified Teacher (General) (BPS-15). | Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher | 18 to 35 years. | (a) Forty per cent by initial recruitment; and |

P.S.T. SPBT

NO PTC

(13)

| | | | | |
|-----|---|--|-----------------|--|
| | | Certificate or two years Associate Degree in Education from a recognized University or eighteen-months Diploma in Education. | | <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the <u>Primary School Head Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General):</p> <p>Provided that if no suitable candidate is available amongst the <u>Primary School Head Teachers</u> for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst <u>Senior Primary School Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p> |
| 14. | Certified Teacher (Industrial Arts) (BPS-15). | <p>(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or</p> <p>(b) Bachelor's Degree from a recognized</p> | 18 to 35 years. | <p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the <u>Primary School Head Teachers</u> with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p> |

10

| | | | | |
|-----|--|---|------------------------|---|
| | | <p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p> | | <p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority-cum- fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p> |
| 15. | <p>Certified Teacher (Agriculture) (BPS-15).</p> | <p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p> | <p>18 to 35 years.</p> | <p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p> |

| | | | | |
|-----|--|--|-----------------|---|
| | | any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture). | | <p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p> |
| 16. | Certified Teacher (Home Economics) (BPS-15). | <p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center; or</p> <p>(ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or</p> <p>(iv) Bachelor's Degree, from a recognized</p> | 18 to 35 years. | <p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p> |

Handwritten signatures and initials in the right margin of the page.

| | | | | |
|-----|--------------------------|---|-----------------|---|
| | | University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics). | | <p>Certified Teacher (Home Economics).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p> |
| 17. | Drawing Master (BPS-15). | Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate. | 18 to 35 years. | <p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p> |

Handwritten signatures and initials in the right margin, including a large circular mark and several scribbles.

| | | | | |
|-----|--|---|-----------------|---|
| 18. | Physical Education Teacher (BPS-15). | Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification. | 18 to 35 years. | <p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p> |
| 19. | Primary School Head Teacher (PSHT) (BPS-15). | <i>B.A Second Divi</i> | | By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least <u>ten years service</u> and having qualification prescribed for initial recruitment of Primary School Teacher. |
| 20. | Senior Primary School Teacher (BPS-14). | | | By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers |

| | | | | |
|-----|----------------------------------|---|-----------------|--|
| | | | | with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher. |
| 21. | Primary School Teacher (BPS-12). | (i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University. | 18 to 35 years. | By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit. |
| 22. | Qari (BPS-12). | Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution. | 18 to 35 years. | By initial recruitment. |

B.A.
Second

SCHEDULE

Selection criterion and other conditions for direct recruitment against the below mentioned posts shall be as under:-

Arabic Teacher

| <u>Educational Qualification</u> | <u>Total Marks: 100</u> |
|---|--|
| SSC | Marks obtained X 20 / total marks = ____ |
| HSSC | Marks obtained X 20 / total marks = ____ |
| BA/BSc | Marks obtained X 20 / total marks = ____ |
| M.A Arabic / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris | Marks obtained X 20 / total marks = ____ |
| Other MA/MSc/M.Ed / MA Edu | Marks obtained X 15 / total marks = ____ |
| MPhil/PhD | Marks = 05 |

Theology Teacher

| <u>Category of Qualification</u> | <u>Total Marks 100</u> |
|---|--|
| SSC | Marks obtained X 20 / total marks = ____ |
| HSSC | Marks obtained X 20 / total marks = ____ |
| BA/BSc | Marks obtained X 20 / total marks = ____ |
| MA/MSc/M.Ed / MA Edu | Marks obtained X 20 / total marks = ____ |
| M.A Islamiat / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris | Marks obtained X 15 / total marks = ____ |
| MPhil/PhD | Marks = 05 |

Qari/Qaria

| Category of Qualification | Total Marks 100 |
|---|--|
| SSC | Marks obtained X 20 / total marks = ____ |
| Qurt Sanad from a recognized Institution. | Marks obtained X 20 / total marks = ____ |
| HSSC | Marks obtained X 20 / total marks = ____ |
| BA/BSc | Marks obtained X 20 / total marks = ____ |
| MA/MSc/ M.Ed / MA Edu | Marks obtained X 15 / total marks = ____ |
| MPhil/PhD | Marks = 05 |

Certified Teacher
(General , Industrial Arts , Agriculture ,Home Economics)

| Category of Qualification | Total Marks 100 For Humanities group at Intermediate/Graduation Level | For Candidate of Science group |
|--|---|---|
| SSC | Marks obtained X 20 / total marks = ____ | 5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection |
| HSSC | Marks obtained X 20 / total marks = ____ | |
| BA/BSc | Marks obtained X 20 / total marks = ____ | |
| CT Certificate/ Diploma in Education /A.D.E. | Marks obtained X 20 / total marks = ____ | |
| MA/MSc/M.Ed / MA Edu | Marks obtained X 15 / total marks = ____ | |
| MPhil/PhD | Marks = 05 | |