31.05.2016

Counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General assisted by Mr. Muhammad Jan, Government Pleader for respondents present. Re-arguments heard and record perused.

Vide our detailed judgment of today in connected service appeal No. 1343/2012 titled "Javed Iqbal-vs-Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education Department, Peshawar and others", this appeal is also disposed of as per detailed judgment. Parties are, however, left to bear their own costs. File be consigned to the record room.

ANNOUNCED 31,05.2016

MIMBER

MEMBER

| | 2012 | this appeal is adjourned to 24.6.2014. | |
|---------|------|--|------------------|
| 1 4 | | | READER |
| 24-6-14 | | Vide order sheet dated 5.5.2013 in connected | appeal No. 1343/ |
| | 2012 | this appeal is adjourned to $15-10-19$ | • |
| • | | | |
| | | | READER |
| | | | 101 |
| T-10-14 | | Vide order sheet dated 5.4.2013 in connected | appeal No. 1343/ |
| | 2012 | this appeal is adjourned to 9-2-15 | 5-1-15 |
| | | | |
| | | | REAGER |
| | | | |
| 6=1-1 | | Vide order sheet dated 5.4.2013 in connected | |
| | 2012 | this appeal is adjourned to $13 - 4 - 15$ | • |
| • | | \mathcal{U}^{+} | Ι Λ |
| | | • | READAR |
| 3-4-15 | | Vide order sheet dated 5.4.2013 in connected | appeal No.1343/ |
| | 2012 | this appeal is adjourned to $18-8-15$ | |
| | | | |
| | | | RHADER |
| • | | · | |
| | | Vide order sheet dated 5.4.2013 in connected | appeal No.1343/ |
| | 2012 | this appeal is adjourned to | <u>·</u> . |
| | | | |
| • | | | READER |
| | - | Vide and an about detect 5 4 2012 in commented | |
| | 2012 | Vide order sheet dated 5.4.2013 in connected this appeal is adjourned to | appear No.1545/ |
| | 2012 | this appear is adjourned to | |
| | | | DEADED |
| • . | | | READER |
| | | Vide order sheet dated 5.4.2013 in connected | appeal No.1343/ |
| | 2012 | this appeal is adjourned to | <u>.</u> |

vide order sheet dated 5.4.2013, in connected appeal No. 1343/

READER

5.04.2013

Vide order sheet dated 5.4.2013, this appeal is adjourned to 26.4.2013 alongwith main appeal No. 1343/2012.

READER

Vide order sheet dated 5.4.2013, this appeal is adjourned to 26-6-13 alongwith main appeal No. 1343/2012.

READER

Vide order sheet dated 5.4.2013, this appeal is adjourned to 19-13 alongwith main appeal No. 1343/2012.

READER

Vide order sheet dated 5.4.2013, this appeal is adjourned to $\frac{20-11-13}{3}$ alongwith main appeal No. 1343/2012.

READER

Vide order sheet dated 5.4.2013, this appeal is adjourned to 20-1-14 alongwith main appeal No. 1343/2012.

READER

Vide order sheet dated 5.4.2013, this appeal is adjourned to $\frac{9-9-14}{1343/2012}$ alongwith main appeal No. 1343/2012.

READER

Vide order sheet dated 5.4.2013, this appeal is adjourned to 94-4-14 alongwith main appeal No. 1343/2012.

READER

Appeal No. 1486/102

24.1.2013.

Counsel for the appellant (Mr. Akhtar Ilyas, Advocate) present and heard. The learned counsel for the appellant, at the outset of his arguments, contended that appeals of similar nature have been admitted for regular hearing vide order dated 17.12.2012 in appeal titled 'Ikramullah-vs-Govt. of KPK etc.' (No. 1322/2012), and also furnished a photo copy of the said order, which is placed on file of appeal No. 1381/2012. The learned counsel further argued that the appellant was appointed when qualification prescribed for the post of PST was Matric, but the qualification has recently been enhanced to F.A and the same qualification has been laid down for promotion, thus adversely affecting the right of promotion of the appellant, without affording opportunity of hearing or defending his right before introduction of impugned changes/amendments in the promotion/service rules. The points raised at the Bar need consideration. The appeal is admitted to regular hearing. Process fee and security be deposited within 10 days. Thereafter, notices be issued to the respondents for written reply as well as reply to application for interim before Final Bench-II on 26.2,2013.

26.02.2013.

14.3.13

Counsel for the appellant, Khurshid Ali, SO and Muhammad Aqeel, Assistant with AAG for the respondents present and requested for time. To come up for written reply on 14.03.2013.

Counsel for the appellant and AAG with Khursheed Ali, SO, Mosam Khan, AD and Muhammad Aqeel Assistant for the respondents present and requested for further time. To come up for written reply positively on 5.4.2013.

MEMBER

Form- A FORM OF ORDER SHEET

| Court of | | |
|----------|-----------|--|
| Case No | 1469/2012 | |

| . | Case No | 1469/2012 |
|----------|---------------------------|---|
| S.No. | Date of order proceedings | Order or other proceedings with signature of judge or Magistrate |
| . 1 | 2 | 3 |
| 1 | 24/12/2012 | As per direction of the worthy Chairman in connected appeal No. 1322/2012 the present appeal filed by |
| | | Mr. Jamshed Khan through Mr. Ghulam Nabi Advocate be |
| | · . | entered in the Institution Register and put up to the Primary |
| 2- | 1-1-2013. | REGISTRAR WILLIAM To come up for preliminary hearing on 24-1-2013 |
| | 1-1 6013. | |
| | | Notice shall be issued to appellant and his counsel. MEMBER |
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BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

Service Appeal No. 1469 /2012 Jamshed Khan PST GPS Kahanin Tehsil & District Haripur

.....Appellant

Versus

INDEX

| S.No. | Description of Documents | Annexure | Pages |
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| 3. | Application for Interim Relief alongwith Affidavit | | 11-13 |
| 3. | Copy of the Notification issued by the Government | 'A' | 14 |
| 4 | Copy of the Notification dated 13.11.2012 | 'B' | 15-30 |
| 5 | Copies of the both the notifications | 'C' & 'C/'1 | 314-34 |

Appellant

Through

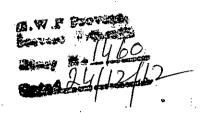
Ghulam Nabi

Advocate, Peshawar.

lower

BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

Service Appeal No. 1469 /2012



Jamshed Khan PST

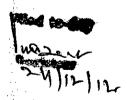
GPS Kahanin Tehsil & District Haripur

.....Appellant

Versus

- 1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Peshawar.
- 2. Secretary to Govt. of K.P.K., Finance Department, Civil Secretariat, Peshawar.
- 3. Secretary to Govt. of K.P.K., Establishment Department Civil Secretariat, Peshawar
- 4. Director Elementary & Secondary Education K.P.K., Peshawar.

.....Respondents



Appeal u/s 4 of NWFP Service Tribunal Act, 1974 to the effect that the newly inducted condition of FA/FSc for the promotion to BPS-14/15 of the PST Teachers may please be set-aside and the promotion may please be granted on seniority-cum-fitness basis purely.

Prayer in Appeal:

On acceptance of this appeal the condition of FA/FSc from the above noted notification for the promotion of the PST Teachers may please be removed and the promotion may please be granted on seniority-cum-fitness basis.

Respectfully Sheweth:

- 1. That the appellants are belonging to the Education Department, all serving on the posts as mentioned against their names in the heading of the appeal.
- 2. That all the appellants have got at their credit on the above said post a long tenure of service extending over 20 to 40 years.
- 3. That previously the basic qualification for the appointment at the post of PST was fixed as Matric Certificate alongwith the PST Certificate from a recognized Institution and all the appellants were appointed on the above said posts having the said qualification as was the requirement at the time of the appointment of the appellants.
- 4. That the basic qualification for the post of PST was duly enhanced with basic qualification from Matric to

F.A./F.Sc in the year 2011 and many other colleagues of the appellants were then appointed on the same posts of PST having their qualification as F.A./F.Sc alongwith the PST Certificate.

- 5. That in the year 2007 a policy of upgradation was promulgated by the than Provincial Government, whereby the PTC; Teachers were upgraded from BPS-07 to BPS-12 on the basis of the length of the service. (Copy of the Notification issued by the Government is attached herewith as Annexure-'A').
- 6. That again a similar summary was formulated at the initial stage by the Education Department that the PST Teachers will be upgraded to BPS-15 having 22 years service, whereas the teachers having 15 years service will be upgraded to BPS-14.
- 7. That the above said policy was just as according to the justice and demand of the teachers community, however lateron the said policy was converted from time scale to the education scale, whereby the promotion policy for the PST Teachers was formulated as under:

"Primary School Head Teacher (PSHT) (BPS-15) By promotion, on the basis of seniority-cum-fitness from amongst senior primary school teachers with at least

4

10 years service and having qualification prescribed for initial recruitment of primary school teacher.

Primary School Teacher BPS-14

By promotion on the basis of seniority-cumfitness' from amongst school teachers with at least 05 years service as such and having qualification prescribed for initial recruitment of primary school teachers.

- 8. That thereby all the fresh appointed F.A/PST have been given the BPS-12, whereas the holders of F.A. Certificate with 10 years length of service may be upgraded/promoted to BPS-15 and the PSTs with the F.A. qualification having 05 years service may be upgraded to BPS-14. (Copy of the Notification dated 13.11.2012 is attached herewith as Annexure-'B').
- 9. That the appellant alongwith his other hundreds of the colleagues having their services extending from 20 to 40 years have been totally ignored and have not been given any chance of upgradation/promotion throughout

their professional career inspite of having such a long spotless tenure of service.

- 10. That this attitude of the respondent department to give benefit to the PST teachers with the F.A./F.Sc qualification over the teachers with the Matric qualification has been formulated without any cogent/legal grounds but just to give benefit to the blue eyed teachers of the respondent department, whom have been appointed in their tenure.
- 11. That all the appellants are also equally entitled to be upgraded on the basis of his tenure of service and be given the same benefit as it has been given to the other PSTs teachers having the F.A. Certificates, as the higher qualification of F.A. can not by any means made the basis for giving any sort of above said benefit to the teachers.
- 12. That in this respect the appellants have also moved their representation to the concerned authorities, thereby explaining their grievance, however no response whatsoever has yet been received by the appellants till the filing of this Service Appeal.
- 13. That the appellants having got no other efficacious/adequate now approaches this Honourable Tribunal on the following grounds amongst the others.

Grounds

- a) That act of the respondent department, thereby depriving the appellants from the above said benefit of upgradation is illegal unlawful without authority/jurisdiction, as well as being based on the malafide intentions of the respondent department is liable to be set-aside.
- have been treated in a discriminatory manner and have been deprived of the above said benefit mere on the ground that they are not having the qualification of FA/FSc is an act unjust and without any reasonable ground, as the basic qualification at the time of the appointment of the appellant was Matric with PST and the basic qualification at the time of the appointment of the benefited teachers were FA/FSc with PST, hence no privilege can be granted to the persons, whom have been appointed on the prescribed qualification.
- c) That the appellants have been serving on the above said since long, whereas the minimum tenure of the service amongst the appellant is 18 years and the maximum tenure amongst the appellant is extended to 40 years and since long all the appellants have been waiting for their turn

to be promoted/upgraded to some higher scale, however after having a tenure of such a long legitimate expectations the appellants have been treated unlawfully without any cogent/solid grounds.

- That it is very respectfully submitted it has never d) that the in cases happened upgradation/promotion the factor of seniority should be abolished/ignored totally and grounds of upgradation/promotion should be made educational qualification, whereas mere upgradation/promotion has always been made on the basis of seniority-cum-fitness and have never at the basis of higher qualification whatsoever it may be. Furthermore still it is not the higher qualification for the teachers whom have been going thorough get benefit for the above said notification, but with the passage of time as the basic qualification has been raised, hence they have been appointed on the basis of F.A./F.Sc Certificate, which said factor cannot be made a ground for their upgradation to BPS-14/15.
- e) That the said act of the respondent department is not merely illegal as well as unlawful, but is also against the very clear Articles of Constitution of

Islamic Republic of Pakistan as engraved in the basic rights of said constitution.

- f) That the appellant has got every right to be treated equally with his other colleagues and closing all the ways of upgradation/promotion for the appellant is against all the norms of justice as it has been done in the above mentioned notification dated 13.11.2012.
- of this Honourable Tribunal that the above said benefit has also been extended to the Clerk's community, whereby the clerk's even with the Matric Certificate have been upgraded from BPS-09 to BPS-16 and similarly according to other notification dated 24th April, 2012 the Federal Government has been pleased to upgrade the PST Teachers from BPS-09 to BPS-14 including the Matriculate Teachers. (Copies of the above said both the notifications are attached herewith as Annexure-'C' & 'C/'1).

It is, therefore, prayed that on acceptance of this Service Appeal the respondents may please be directed to set-aside the term of

"having qualification prescribed for initial recruitment of primary school teachers"

and the appellants may please be considered equally for the above said promotion/upgradation with the other colleagues, whom have been appointed on F.A./F.Sc basis and the above said conditions being illegal unlawful, unconstitutional and discriminatory may please be deleted from the conditions of promotion of the PST teachers to the BPS-14/15.

Any other remedy to which appellant is found entitled, in the peculiar circumstance of the case may also be granted.

Appellant

Through :

Ghulam Nabi

Advocate, Peshawar

BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

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|--------|-------------|-----------|------------|-----------|---------------------------------------|------|----------|
| G | ovt. of | K.P.K., | through | Secretary | Schools | & | Literacy |
| . : | | | | Versus | · · · · · · · · · · · · · · · · · · · | A | opellant |
| GPS Ka | hanin Teh: | sil & Dis | trict Hari | ipur | - | | |
| | ed Khan PS | • | | | | | |
| ` | out vice Ap | pear 140. | | 72012 | , | | |

AFFIDAVIT

I, Ghulam Nabi Advocate, Peshawar as per instructions of my client do hereby solemnly affirm and declare on oath that contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Tribunal.

Sul weeks Deponent



BEFORE THE SERVICE TRIBUNAL K.P.K., PESHAWAR

| 4. | C.M.190 | /2012 | ÷ |
|--------|-----------------------------|--------------|-------------|
| | In | 1947 3 | |
| i ÿ | Service Appeal No | /2012 | |
| Jamsh | ned Khan PST | | · · · |
| SPS K | ahanin Tehsil & District Ho | iripur | |
| | | Versus | Appellant |
| | Govt. of K.P.K., through | Secretary | |
| | Elementary & Secondar | y Education, | · · |
| | Peshawar & others | | Respondents |

Application for temporary injunction to the effect that respondent may kindly be restrained from taking any action for the promotion of PSTs to BPS-14/15 as according to the procedure mentioned in the impugned rules/notification dated 13.11.2012

Respectfully Sheweth:

- 1. That the appellant has filed the above titled service appeal before this Honourable Tribunal, in which no date of hearing has yet been fixed.
- 2. That respondent vide notification dated 13.11.2012 with regard to the fresh education policy has promulgated a new method of promotion which has violated the

promotion right of thousands of teachers including the appellant

- 3. That the applicant/appellant has very prima facie cause of action and is very hopeful for its ultimate success of his appeal.
- 4. That all the three ingredients i.e. prima facie case, balance of convenience and irreparable loss as per spirit of the rule for granting injunction is in favour of the applicant/appellant are present in the said appeal.
- 5. That in case the injunction as prayed for above is denied, the applicant/appellant will suffer with irreparable loss as the impugned vacancies will be fill up and there would be no chance for appellant accommodation. Therefore, it is in the interest of justice to stay further proceedings on the impugned notification till the final decision of this Honourable Tribunal.
- 6. That there is no legal bar in granting the injunction as prayed for above.
- 7. That the facts and grounds taken in the memo of appeal may kindly be considered as part and parcel of the instant application.

It is, therefore, humbly prayed that in the light of the above said submissions this Honourable Tribunal may please be kind enough to restrained the concerned respondents from taking any action in promoting the PSTs teachers on the basis of the above noted notification, thereby depriving the appellants from the right of promotion.

ON.

Appellant

Through

Ghulam Nabi

Advocate, Peshawar

AFFIDAVIT

I, Ghulam Nabi Advocate, Peshawar as per instructions of my client do hereby solemnly affirm and declare on oath that contents of the above application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Tribunal.

Deponent

Government of NWFP Finance Department No. SO (FR) 10-22(B)/2005 Dated: 01.10.2007

Τ.

The Secretary to Govt. of NWFP, Schools & Literacy Department.

Subject:

UPGRDATION OF VARIOUS POSTS OF TEACHING/ CAREER STRUCTURE IN SCHOOLS AND LITERACY DEPARTMENT GOVERNMENT OF NWFP.

Sir

I am directed to refer to your letter No. SO(G)104/2007 dated 01.10.2007 on the subject noted above and to inform that the Chief Minster NWFP has been pleased to upgraded various posts of teachers in Schools and Literacy Department NWFP as per details given below in respect of those incumbents mentioned against each with immediate effect.

| S.No | Designation/ existing | Qualification | Revised |
|-------|------------------------|---|---------|
| 0.110 | Pay Scale | | Pay |
| | ay out | | Scale |
| 1. | Primary School Teacher | F.A / FSc at lest 2 nd Division | 09 |
| | PST BPS-09 | with PTC/ Diploma in . | |
| • | 1 | Education | |
| 2 | PST with requisite | On the basis of 10 years | 12 |
| | experience renamed as | service experience as Primary | |
| | Head Teacher/ head | School Teacher in BPS-09 | |
| | Mistress of Rpmary | | |
| | School BPS-07 | | |
| 3 | C.T BPS-09 | B.A. BSc at least 2 nd Division | 15 |
| | | with Diploma in Education/CT | |
| 4 | AWICT Technical | B.A/ BSc at lest 2 nd Division | 15 |
| | Industrial Arts/ Home | with Diploma in Education/ | |
| | Economics BPS-09 | Certificate from Directorate of | |
| | | Curriclum and Teachers | |
| | | Education NWFP Abbottabad | |
| | | in Agro Tech/ Indsutrial Arts | · |
| | | Home Economics. | |
| 5 | D.M BPS-09 | B.A/ B.Sc at least 2 nd Division | 1.15 |
| ; | | with Drawing Master Course. | |
| 6. | PET BPS-09 | B.A/ BSC at least 2 nd Division | ·15 |
| 1, | | with JDPE. | |



| (-, | Qari/Qana BPS-07 | Hafiz-c-quran with SSC at lest 2nd Division and Sand in Qirat. | 12 / |
|-----------------|--|--|------|
| 8. | SST/SST Teacher/Agri with requisite experience rename Sr. SST/Sr. SST Teacher/Sr. SST Agri | M.A./M.Sc at least 2 nd Division with B.Ed. M.Ed/M.A. | 17 |
| 9. | DPE BPS-16 | M.Sc at least 2 nd division in (HPE) | 17 |

The promotion/direct Promotion against the upgraded posts shall be made as per laid down procedure and in accordance with the Service Rules to be framed pursuant to the relevant provisions of NWFP Civil Servants (appointments, Promotion and Transfer) 1989 read with the NWFP Civil Servants Act, 1973 in the light of the meeting held on 26.09.2007 of the committee constituted vide Schools & Literacy Department Notification No. SO(G)S&L/1-4/2007 dated 01.08.2007.

Audit copy may please be prepared and sent to the Department for authentication/signature.

Section Officer (FR)

Endst of even No. & date.

Copy for information & necessary action to:-

. . . Accountant General NWFP.

2. Director Schools & Literacy NWFP, Peshawar.

3. Director of Education FATA NWFP, Peshawar.

4. PSO to Chief Minister NWFP.

5. PSO to Chief Secretary NWFP.

6. PS to Secretary Finance Department NWFP.

7... All District/agency Accounts Officers in NWFP.

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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 Civ Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondar 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.
- The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
- 3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department
- The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar. The Accountant General, Khyber Pakhtunkhwa Peshawar.
- 6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- The Director Education (FATA), Peshawar.

actor Curriculum & Teachers Education Abbottabad.
actor (PITE) Khyber Pakhtunkhwa Peshawar.
actor ESRÜ, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
buty Director Database(EMIS) E&SE Department.
act Coordination Officers in Khyber Pakhtunkhwa.
butive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
biot Accounts Officers in Khyber Pakhtunkhwa /Agency Accounts Officers FATA.
severnor, Khyber Pakhtunkhwa.
bioef Minister, Khyber Pakhtunkhwa.
bioef Minister, Khyber Pakhtunkhwa.
bioef Secretary, Khyber Pakhtunkhwa.
bioef Secretary, Khyber Pakhtunkhwa.
bioef Secretary, Khyber Pakhtunkhwa.
bioef Secretary, ESSE Department.

Sapar Garage (Primary)

| | enclature of the post. | Minimum qualification and experience for initial appointment or by transfer. | Age limit. | Method of recruitment. |
|--------------|-------------------------|---|---------------|--|
| | 2. | 3. | 4. | 5 |
| Secon BPS | Jary School Teacher 16) | subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities | vears. | (a) -Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: |
| | | and other equivalent groups from a recognized University; or (ii) M.A in Education or Bachelor's Degree in Education from a recognized in tersity. | | (i) forty per cent from emongst the Centified Teachers (General), Centified Teachers (Agriculture), Confirm when the confirmations |
| | | | | Tome to with and having |
| | | | | (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; (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; |



| / | |) |
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| / | 8 | 1 |
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| | | 4 |
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| | | (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 |
| | | (v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No Frand |
| | | (b) fifty per cent by initial recruitment. |
| Sen (or 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. |
| Sem 101 Theology Teacher $S(I)$ (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. |
| Sen 1 Obr Certified Teacher (SCI) (General) -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). |

| Control | | |
|---|---|---|
| r Conified Teacher Jadynial Arts) 16). | | By promotion, on the basis of seniority-cun fitness, from amongst Certified Teacher (Industrial Arts), with at least five years service as such and having qualification as prescriber for initial recruitment of Certified Teacher (Industrial Arts). |
| Sem 1 D'Certified Teacher Aguilture) BP 16). Drawing Master | | By promotion, on the basis of seniority-cum fitness, from amongst Certified Teacher (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture). |
| BPS [6). | - | 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. |
| Semilor Certified Teacher Home Economics) Gentlor Physical Education | | 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). |
| Semior 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. |

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| | | | (20) | 6 |
|--------------------|-----------|--|-----------|--|
| #bic Teacher (AT) | (i) | Second Class Secondary School Certificate, | .20 to 35 | By initial recruitment |
| $_{eta} ho$ S-15). | | from a recognized Board with Shahdatul | years. | |
| | ļ . | Alamia Fil Uloomul Arabia wal Islamia from | 1 | • |
| | ! | a recognized Tanzimuatul Wafaqul Madaris: | | |
| | | or Darul Uloom Saidu Sharif Swat, Darul | | |
| | | Ulcom Charbagh Swat, Darul Uloom Chitral, | | |
| | | Darul Uloom Darosh Chitral and any other | · . | |
| | ļ | Government run Darul Uloom, as notified by | | |
| | | the Government from time to time; or | | |
| | (H)" | Second Class Master's Degree in Arabic from | | |
| | · · · · · | a recognized University. | | |
| BPS 15: | (11 | Second Class Secondary School Certificate, | 20 to 35 | (a) Seventy-five per cent by initial |
| 605-151 | | from a recognized Board with Shahdatul | vears. | recruitment; and |
| 1 | | Alamia from a recognized Tanzimatul | • | |
| | i - | Wafaqul Madaris or Darul Uloom Saidu | , | (b) twenty-five per cent by promotion, on the |
| • | | Sharif Swat, Darul Uloom Charbagh Swat, | | basis of seniority-cum-fitness, from |
| | | Darul Uloom Chitral, Darul Uloom Darosh | | amongst the Senior Qaris, with at least |
| <u> </u> | | Chitral and any other Government run Darul | | five years service and having |
| · . | | Uloom, as notified by the Government from | , | qualification prescribed for initial |
| | <u> </u> | time to time; or | • . | recruitment of Theology Teacher: |
| | | | | Note: In case of non availability of suitable |
| | (ii) | Second Class Master's Degree in Islamiyat | | person for promotion, then by initial |
| | | from a recognized University. | - | recruitment. |
| Centor Oari | | | · · | By promotion on the last C |
| Senior Qari | | | - | By promotion, on the basis of seniority-cum- |
| 131. | | | | fitness, from amongst Qaris, with at least five |
| <u></u> | - | | | years service as such and having qualification prescribed for initial recruitment. |
| Ces Wed Teacher | Bachel | or's Degree or equivalent qualification from a | 18 to 35 | (a) Forty per cent by initial recruitment; and |
| (BPS-15). | tecoබා | ized University with Certified Teacher | years. | |

| | | | Certificate or two years Associate Degree Education from a recognized University or eightee months Diploma in Education. | n n | (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 (General): Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cumfitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General). |
| Cerlif Andusi MS | ed Teach ial Arts | er) | (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 (b) Bachelor's Degree from a recognized | 18 to 35 years. | Note: In case of non availability of suitable person for promotion, then by initial recruitment. (a) Forty per cent by initial recruitment; and (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 |



| | T | |
|---|--|--|
| - | University with nine months training from | |
| | any Government Agro Technical Teacher | |
| | Training C. Teacher I | (Industrial Arts): |
| • | Training Center of the Level of Certified Teacher, Agra technical (led.) | |
| | Teacher, Agro technical (Industrial Arts). | Provided |
| · · · · · · · · · · · · · · · · · · · | . (mausinal Aris). | Provided that if no suitable candidate is available |
| | | candidate is available amongst the |
| | | Primary School Head Teachers for |
| | | Promotion, then the posts will be filled by promotion on the basis. |
| | | by promotion on the basis of seniority- |
| 1 | | cum- Grass of seniority- |
| | | cum- fitness, from amongst Senior Primary School Teachers |
| | · | Primary School Teachers with at least |
| | | |
| | | qualification present and having |
| | | recent. |
| · · · · · · · · · · · · · · · · · · · | | |
| | | (Industrial Arts). |
| | | |
| | | Note: In case of non available |
| Ced fied Teacher (6) | | Note: In case of non availability of suitable |
| As f culture) (i) (j) (j) | | recruitment then by initial |
| 1 | University with one year training in y | 8 to 35 (a) Forty per contlain |
| 13/17 | Agriculture from any C year training in y | ears. (a) Forty per cent by Initial recruitment; and |
| | Agriculture from any Government institute or center with nine months | and the state of t |
| | center with nine months training from | (b) sixty per cent by promotion, on the basis |
| | Government Agro Technical Teacher | of seniority-cum figures, on the basis |
| | | of seniority-cum-fitness from amongst |
| \`\ | Teacher Agro Technical (Agriculture) | the Primary School Head Teachers, with |
| | Teacher Agro Technical (Agriculture); or | at least five years service and having qualification prescribed. |
| (ii) | Bachelor's Degree with Agriculture as one of the subject, from a recognized II. | qualification prescribed for initial recruitment of Certification |
| | the subject of the su | recruitment of Certified Teacher |
| | the subject, from a recognized University: or | (Agriculture): Certified Teacher |
| ————— (iii) | D | ΛI |
| 1 (111) | Bachelor's Degree 6 | Daries 1 |
| | DURILLE ITOM | |
| | begree from a recognized | condition that if no spitable |
| | Bachelor's Degree from a recognized | Provided that if no suitable candidate is available amongst the |

| | | . 4 | |
|------------------------|--|----------|--|
| | any Government Agro Technical Teacher Training Center of the Level of Certified | | promotion, then the posts will be filled by promotion on the basis of seniority-cum- |
| | Teacher, Agro technical (Agriculture). | | fitness, from amongst Senior Primary |
| | | | School Teachers with at least five years |
| | | } | |
| | | | service and having qualification prescribed for initial recruitment of |
| • | | 1 | Cértified Tancher (April 14 |
| | | | Cértified Teacher (Agriculture). |
| | | | Note: In case of non availability of suitable |
| | | | person for promotion, then by initial |
| | | | recruitment. |
| Cer [Hel Teacher (Home | (i) Bachelor's Degree with Home Economics, as | 18 to 35 | (a) Forty per cent by Initial recruitment; and |
| Enco. Offics) 15) | one of the subject, from a recognized | years. | , and rectainment, and |
| 15) | University with in service training from | | (b) sixty per cent by promotion, on the basis |
| 134> | Government Agro Technical Teacher | | of seniority-cum-fitness, from amongst |
| | Training Center; or | • | the Primary School Head Teachers with |
| | (ii) Certified Teacher Certificate with Home | | at least five years service as such and |
| | Economics, as one of the subjects, from any | | having qualification prescribed for initial |
| | Government Training school or college with | | recruitment of Certified Teacher (Home) |
| | Bachelor's Degree; or | | Economics): |
| | | • | Beolionnes). |
| | (iii) Bachelor's Degree from a recognized | | Provided that if no suitable |
| | University with nine months training from | | candidate is available amongst the |
| | Government Agro Technical Teacher | | Primary School Used T. J. |
| | Training Center of the level of the | | Primary School Head Teachers for |
| | Certified Teacher Agro Technical (Home | | promotion, then the posts will be filled by |
| | Economics); or | | promotion on the basis of seniority-cum- |
| | | 4 | fitness, from amongst Senior Primary |
| | | | School Teachers with at least five years service and having qualification |
| | (iv) Bachelor's Degree, from a recognized | | |
| | Total a recognized | | prescribed for initial recruitment of |

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| University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher fraining center of the level of certified Teacher Agro Technical (Home Economics). | Note: | Certified Teacher (Home Economics). In case of non availability of suitable person for promotion, then by initial recruitment. |
|---|---------------------|---|
| ine year Drawing Master (DM) course | 18 to 35 (a) years. | Eighty per cent by initial recruitment; and |
| licate. | (ь) | 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: |
| | _ | 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. |
| | Note: | In case of non-availability of suitable candidate for promotion, then by initial recruitment. |

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| (2 | <u> </u> | |
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| Physieral Education (BPS-15). | Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education years. course or Army equivalency or other equivalent qualification. | The second of milital fremiliances and |
|-------------------------------|--|---|
| • | | amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher: |
| | | Provided that if no suitable cancidate 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. |
| PSWY School Head (PSHT) | | Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment. |
| e ont Y famary School | | By promotion, on the basis of seniority-cum- fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of 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 having qualification prescribed for in 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 | vears | By initial recruitment on merit at Union Collevel: provided that if no suitable candida within the Union Council is available, then the adjacent Union Councils on merit. |
| | | (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University. | , | |
| <u>.</u> | Qari (BPS-12). | Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution. | 18 to 35 years. | By initial recruitment. |

| 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | Marks = 05 | |
|--|-------------------------------------|--|
| | Marks obtained X 15/ 10tal marks = | (14 July Tu |
| | Marks obtained X 20 total marks = | Islamia! Shahdarul Alamia Fil Illoomid Libri |
| | Marks oblained X20/1010 morts = | MANMSON Ed / MA Edu |
| | Marks obtained X20/total marks = | ~58/78 |
| | Marks obtained X 20 V total marks = |) SSSH |
| 1) | Total Marks 100 | 202 |
| $\langle \cdot \rangle$ | | Calegon, of Qualification |

Theology Jeacher

| 20 = dv | 7/0 |
|-----------------------------------|--|
| ** obioined X 15/10101 marks = | 0 مُرْط الله الله الله الله الله الله الله الل |
| = throninol X 20 / 1010 l'marks = | Stom a recognized Torainment Wolony Medaris LUMSSAM BAW LUM SAM Edu MA Edu |
| = 2 Noticined X 20/101al morks = | robis / Shahdulul Alamia Fil I Teach |
| = Wall biol 10 . X. bonicido des | 77 |
| ats obtained X 20/10101 marks = | 15 |
| oiel Moths: 160 | , |

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

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Qari/Qaria

| Category of Qualification | Total Marks 100 |
|--|-------------------------------------|
| SSC | Maxis obtained X 20 'solal marks = |
| Qirt Sanad from a recognized Institution. | Marks obtained X 20 / total marks = |
| HSSC | Marks obtained -X 201 total marks = |
| BA/BSc / | Marks obtained No. 24 mars |
| MAJMSc/ M.Ed / MA Edu | Marks obtained X 13: Torus marks |
| MPhiUPhD | Maris = 05 |

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

3

| 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 FSc, 5 Extra marks for B.Sc and |
| HSSC | Marks obtained X 20 / total marks = | 5 Extra marks for M.Sc will be added to the total scare obtained by a candidate during his selection |
| BA/BSc | Marks obtained X 201 total marks = | |
| CT Certificate/ Diploma in Education IADE. | Marks obtained X 20 / Iolal marks = | |
| MAH MA Edu MPhiVPhD | Marks obtained X 15/total marks = | |
| | Marks = 05 | |

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Demoins Marter

| A., | | Ene Candidate of Crience oroun | |
|------------------------------|---|---|---------|
| Categor of Qualification | Total Marks 100 | ל בתווחותו כל הרגונה פו מיים | |
| 300 | Marks obtained X 20 / total marks = \$1 | S Extra marks for FSc, S Extra marks for B.Sc and S Extra marks for M.Sc will be added to the total | |
| 300 | Marks obtained X 20 / total marks =sec | score obtained by a candidore during his selection | |
| BUBS | Marks obtained X 20 / total marks = | | |
| DH Certificate | Marks obtained X 20 / total marks = | | |
| HANSON Ed IN Edu | Marks obtained X 15/total marks = | | |
| A PAULPAD | Marks = 05 | | |
| Phrscal Education Teacher | | | ''' 🖳 T |
| Comment of Qualification | Total Marks 100 | For Candidate of Science group | |
| | Maris obtained X 201 total marks = | 5 Extra marks for FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total | |
| HING. | Marks obtained X 201 total marks = | score obtained by a candidate during his selection | |
| | Marks obtained X 201 total marks = | | |
| MELON Equivalent Certificate | Marks obtained X201 total marks = | | |
| THE SHIELD MA Edu | Marks obtained X 15 / total marks | | 1 |
| APRIUPAD ; | Marks = 05 | | |

Primary School Teacher

S Extra marks for F.S., 5 Extra marks for B.Sc and S score obiained by a cardidate during his selection Estra marks for M.Sc will be added to the toicl For Candidate of Science group Total Marks 100 For Humanities group at Marks obtained X201 total marks = Marks obtained X 10/10tal marks = Maris obtained X25/101al marks = Marks obtained X 20 / total marks = Maris cotained X 20 / total maris = Intermediate Level Maris = 05 PST Certificate/ Diploma in Category of Qualification ALUAGEN EATIN EA Education IADE (FPhiUPLD 8.V.BS

Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents

The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final 3. In case a documens(s) islaye found fakel forged bogus upon scrutiny verification, the service of the teacher concerned shall be terminated and the amount merit fist after making necessary corrections while addressing the observations/objections/appeals, fallowed by requisite appointment orders.

Deni Asnod from recognized Taxeemar-ul-Wafaqul Moduris. Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chiral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time will be occeptable for the purpose of poid to him as salary shall be recovered from him and an FIR shall be lodged ogainst him on account of forgerysfraud under the relevant law.

"C" (31)

Islamabad, the 24th April 2012

OFFICE ORDER

6-556

In continuation of Federal Directorate of Education's office order of even number dated 18.05.2011, consequent upon one time waiver in the conditions of qualification/experience granted by the Prime Minister vide U. O. No. 3759/PSPM/2012 dated 24.02;2012, as conveyed by the Capital Administration & Development Division vide No.F.4-23/2011-(Education) dated 25,04.2012 and on the recommendations of Departmental Promotion Committee meeting held on 24.04.2012, the following Matric Trained Teachers (BS-09) are promoted to the upgraded post of Elementary School Teacher (BS-14) w.c.f. 01.01.2011:

| XAINAD BIB 01.02.1953 | <u></u> | | | NOLTUTION |
|--|---------------|------------------|---------------|---------------------------|
| ZAINAB DIST | . S.# | NAME | DATE OF BURTH | |
| RUKISANA JABBEN 05.12.1954 IMSG (-X), DHOKE GANGAL | <u></u> ; | ZANAB BIBI | 01.02.1953 | |
| RIFFAT RAANA | | | · 08.12.1954 | IMSG.G-6-7/4, IBD. |
| | | | 01.07.1953 | IMSG (I-X). DHOKE GANGAL |
| ABIDA PALVEEN 22.1c.1955 | | | 04.04.1954 | IMSG (I-X). DHOKE GANGAL |
| FUKHKAI BEGUM | | | | IMS (I-V). HOON DHAMIAL |
| 7. SAJIDA BIBI 05.02.1956 IMSG (I-V), No.2; G-6/I 8. CHULAIM FIZA 30.03.1954 IMS (I-V), No.2; G-6/I 9. PARKHANDA MASOOD 15.05.1933 IMSG (I-V), IHOON DITAMIAL 10. SAERDA KHATGON 15.03.1955 IMSG (I-V), IHOON DITAMIAL 11. GHULAM SAKINA 13.04.1934 IMSG (I-V), CHARLED 12. WAJMA BIBI 22.06.1923 IMSG (I-V), CHARLED 13. AMIRA BIBOUM 23.07.1933 IMS (I-V), KOT HATIBAL 14. KHUNSHID AKHTAR 15.08.1952 IMS (I-V), FIND PARACHA 15. KAUSAR SULTANA 02.01.1956 IMS (I-V), PIND PARACHA 16. SURRAIYA-BANO 02.06.1954 IMS (I-V), PIND PARACHA 17. MASOODA AZIZ 06.06.1954 IMS (I-V), PIND PARACHA 18. GULFOOZ AKHTAR 140.01.1953 IMS (I-V), SANG JANI (FA) 19. GULE-NASTEEN 04.12.1953 IMSG (I-V), MORRI MUGHAL (FA) 20. SHAMSHAD BEGUM 02.06.1954 IMSG (I-V), MORRI MUGHAL (FA) 21. PARVEEN AHTAR 01. | | | 01:07.1956 | IMSG (I-X). DHOKE GANGAL |
| 6 CHULAM FIZA 30.03.1954 IMS (I-V), B.DON DITAMIAL 9 PAREFIANDA MASODD 13.05.1933 IMSG (I-V), B.DON DITAMIAL 10 SAEBDA KHATGON 15.08.1953 IMSG (I-V), DHOKE HASHU (I-A) 11 GHULAM SAKINA 13.04.1954 IMSG (I-V), DHOKE HASHU (I-A) 12 NAJMA DIBI 22.06.1953 IMSG (I-V), G-64, IDO 13 AMRA BIBI 22.06.1953 IMS (I-V), KOT HATHEAL 14 KEUNSHID AKHTAR 15.08.1952 IMS (I-V), DOOR HARSHID 15 RAUSAR SULTANA 02.01.1956 IMS (I-V), DOOR BANGIAL 16 SURRAIYA-BANO 02.06.1954 IMS (I-V), DOOR BANGIAL 16 SURRAIYA-BANO 02.06.1954 IMS (I-V), DOOR BANGIAL 17 MASOODA AZIZ 06.06.1954 IMS (I-V), DOOR BANGIAL 18 GULPOZ AKHTAR 14.05.1953 IMS (I-V), DOOR BANGIAL 19 GULE-BASREEN 04.12.1955 IMS (I-V), LOPRA GHORA 20 SHAMSHAD BEGUM 02.09.1954 IMS (I-V), NO.3.181 21 PARVEEN AHTAR 01.08.1956 | | | 05.02.1956 | |
| PARRHANDA MASOOD | | | 30.03.1954 | IMS (I-V) No.2; G-6/1 . |
| 10 SAERDA KHATOON | | | 13.05.1953 | IMSC (I-V), HOON DHAMIAL |
| 11 GHULAM SAKINA 13.04.1954 IMSG (I-V), DHOKE HASHO (I-V) 12 NAJMA TUBL 22.06.1953 IMSG (I-V), G-M, IDD 13 AMDA DEGUM 37.07.1953 IMSG (I-V), COT HATTIAL 14 KPUNSHID AKHTAR 15.08.1952 IMS (I-V), PIND PARACHA 15.08.1952 IMS (I-V), PIND PARACHA 15.08.1953 IMS (I-V), PIND PARACHA 15.08.1954 IMS (I-V), NO.51, G-107.19D 16 SURRALYA-BANO 02.06.1954 IMS (I-V), NO.51, G-107.19D 17 MASOODA AZIZ 06.06.1954 IMS (I-V), DOORA BANGIAL 18 GULFOOZ AKHTAR 14.00.1953 IMS (I-V), UPPRA GHORA 19 GUL-E-NASREEN 04.12.1953 IMSG (I-V), SANG JANI (FA) 19 GUL-E-NASREEN 04.12.1953 IMSG (I-V), SANG JANI (FA) 19 GUL-E-NASREEN 04.12.1953 IMSG (I-V), INS. F-7.4, IBD 19 ARVEEN AHTAR 01.08.1956 JMSG (I-V)III), S. F-7.4, IBD 19 ARVEEN AHTAR 01.08.1956 JMSG (I-V), MOHRI MUGHAL (FA) 19 ARVEEN AHTAR 14.05.1953 IMSG (I-V), MOHRI MUGHAL (FA) 19 ARVEEN AHTAR 15.02.1957 IMSG (I-V), MOHRI MUGHAL (FA) 19 ARVEEN | | | 15.0%.1953 | IMSG (I-X), 1-10/4, IBD. |
| 12 | | | . 13.04.1954 | |
| 13 AMRNA DEGUM 23.02.1953 IMS (I-V), KOT HATTIAL 14 KHUKSHID AKHTAR 15.03.1952 IMS (I-V), PIND PARACHA 15 KAUSAR SULTANA 02.01.1956 IMS (I-V), PIND PARACHA 16 SURRATYA-BANO 02.06.1954 IMS (I-V), NO.51, G-10/2.1BD; 17 MASOODA AZIZ 06.06.1954 IMS (I-V), DOOKA BANGIAL 18 GULFOOZ AKHTAR 14.05.1953 IMS (I-V), UPPRA GHORA 19 GUL-E-NASTBEEN 04.12.1955 IMSG (I-V), UPPRA GHORA 19 GUL-E-NASTBEEN 02.09.1954 IMSG (I-V), SANG JANI (FA) 20 SHAMSHAD BEGUM 02.09.1954 IMSG (I-VIII), S. F-7.4, IBD, 10 PARVEEN AHTAR 01.08.1956 IMSG (I-VIII), S. F-7.4, IBD, 12 PARVEEN AHTAR 01.08.1956 IMSG (I-VIII) No.49, I-10/1 23 ZAHIDA PARVEEN 03.02.1957 IMSG (I-V), MOHRI MUGHAL (FA) 24 SHAGUITTA SHAHEEN 02.06.1955 IMSG (I-V), MOHRI MUGHAL (FA) 25 NASIM AKHTAR 15.02.1954 IMSG (I-V), MOHRI MUGHAL (FA) 26 NAJMA YASMEEN 11.10.1955 IMS (I-V), NO.3, IBD, 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V), NO.3, IBD, 28 RUKHSANA TARIQ, 03.09.1955 IMS (I-V), NO.49, I-10/1, IBD 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V), NO.49, I-10/1, IBD 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V), NO.49, I-10/1, IBD 31 SAMIA HANAN 16.12.1959 IMS (I-V), C-7.5/1, IBD, 32 YABIRA ASHFAQ KAZMI 19.12.1953 IMSG (I-V), NO.49, I-10/1, IBD 33 BUSHRA ASHFAQ KAZMI 15.02.1957 IMS (I-V), C-7.5/1, IBD, 34 NASIM AKHTAR 05.01.1957 IMS (I-V), C-7.5/1, IBD, 35 SAFIA SULTANA 15.01.1952 IMS (I-V), D-7.2, IBD, 36 JOSPHIN YOUNIS 04.01.1953 IMS (I-V), D-7.2, IBD, 37 AZMAT UN NISA 16 (0.1953 IMS (I-V), D-7.2, IBD, 38 MUNAZA GUL 20.05.1955 IMS (I-V), D-7.2, IBD, 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V), D-7.2, IBD, 41 RAZA ZAMAN 16.12.1959 IMS (I-V), D-7.2, IBD, 42 RUKHSANA YASMEEN 02.05.1962 FIMS (I-V), O-7.2, IBD, 42 RUKHSANA YASMEEN 02.05.1962 FIMS (I-V), O-7.2, IBD, 42 RUKHSANA YASMEEN 02.05 | | | 22.06.1953 | IMSG (I-V) G-5/4, 113.0 |
| 14 KPUKSHID AKHTAR | | | 23,07,1953 | |
| 15 KAUSAR SULTANA 02.01.1956 IMS (I-V).G-7.37.IBD. 16 SURRAIYA-BANO 02.06.1954 IMS (I-V). BOOKA BANGIAL 17 MASOODA AZIZ 06.06.1954 IMS (I-V). BOOKA BANGIAL 18 GULPOOZ AKHTAR 14.01.1953 IMS (I-V). UPPRA GHORA 19 GUL-E-NASREEN 04.12.1955 IMSG (I-V). UPPRA GHORA 19 GUL-E-NASREEN 04.12.1955 IMSG (I-V). SANG JANI (FA) 20 SHAMSHAD BEGUM 02.09.1954 IMSG (I-V). INS. F.7.4, IBD. 21 PARVEEN AHTAR 01.08.1956 IMSG (I-V). MOHRI MUGHAL (FA) 22 RUKHSANA TANVEER 14.05.1953 IMSG (I-V). MOHRI MUGHAL (FA) 23 ZAHIDA PARVEEN 03.02.1957 IMSG (I-V). MOHRI MUGHAL (FA) 24 SHAGUIFTA SHAHEEN 02.06.1955 IMSG (I-V). MOHRI MUGHAL (FA) 25 NASIM AKHTAR 15.02.1954 IMSG (I-V). NO.3, IBD. 27 RASHIDA YASMEEN 11.10.1955 IMS (I-V). NO.3, IBD. 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V). NO.3, IBD. 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). G.7.1, IBD. 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V). KOT HATHIAL (FA) 31 SAMIA ILANAN 16.12.1959 IMS (I-V).C-7.3, I, IBD. 32 SABIRA ASHFAQ KAZMI 19.12.1953 IMSG (I-V).C-7.3, I, IBD. 33 JUSHRA KHANUM 15.10.1955 IMS (I-V).NO.49, IBD. 34 NASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. 35 JUSHRA KHANUM 15.10.1952 IMS (I-V).C-6.1-2, IBD. 36 JCSPHIN YOUPIIS 04.01.1953 IMS (I-V).D-G-8.4, IBD. 37 AZMAT UN NISA 16.10.1955 IMS (I-V).C-6.1-2, IBD. 39 MUNAZA GUL 20.05.1959 IMS (I-V).FYE SIHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).FYE SIHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V).C-7.2, IBD. 42 RUKHSANA YASMEEN 02.05.1962 FIMS (I-V).C-7.2, IBD. 42 RUKHSANA YASMEEN 02.05.1962 FIMS (I-V).C-7.2, IBD. | | | 15.05.1952 | |
| 17 MASOODA AZIZ 06.06.1934 IMS (I-V). BOOKA BANGIAL 18 GULFOOZ AKHTAR 14.00.1953 IMS (I-V). UPPRA GHORA 19 GUL-E-NASREEN 04.12.1953 IMSG (I-V). SANG JANI (FA) 20 SHAMSHAD BEGUM 02.09.1954 IMSG (I-VIII).S. F-7.4, IBD. 21 PARVEER AHTAR 01.08.1956 IMSG (I-VIII).S. F-7.4, IBD. 22 RUKHSANA TANVEER 14.05.1953 IMSG (I-V). MOHRI MUGHAL (FA) 23 ZAHIDA PARVEEN 03.02.1957 IMSG (I-V). MOHRI MUGHAL (FA) 24 SHAGUITA SHAHEEN 02.06.1954 IMSG (I-V). WOHRI MUGHAL (FA) 25 NASIM AKHTAR 15.02.1954 IMS (I-V). NO.3, ISD. 26 NAJMA YASMEEN 11.10.1955 IMS (I-V). NO.3, ISD. 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V). O-7.1, IBD. 28 RUKHSANA TARIQ 03.09.1955 IMS (I-V). O-7.1, IBD. 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V).NO.49, I-10/I, IBD 31 SAMIA HANAN 16.12.1929 IMS (I-V).NO.40, I-10/I 32 SABISA ASHFAQ KAZMI 39.12.1935 IMS (I-V).NO.49, IBD. 33 SUSHRA KHANUM 15.02.1967 IMS (I-V).O-7.5/I, IBD. 34 NASIM AKHTAR 05.01.1957 IMS (I-V).O-49, IBD. 35 SAFIA SULTANA 05.01.1957 IMS (I-V).O-6.1-2, IBD. 36 JOSPHIN YOURIS 04.01.1955 IMS (I-V).O-6.1-2, IBD. 37 AZMAT UN NISA 16.10.1935 IMS (I-V).O-7.6/I-3-3 38 SUSHRA KHANUM 15.10.1952 IMS (I-V).O-7.6/I-3-3 39 MUNAZA GUL 20.05.1955 IMS (I-V).O-7.5/I-3 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).O-7.2, IBD. 40 GHAZALA YASMEEN 02.05.1959 IMS (I-V).O-7.2, IBD. 41 RAZIA ZAMAN 16.12.1959 IMS (I-V).O-7.2, IBD. 42 RUKHSANA YASMEEN 02.05.1962 FIMS (I-V).O-7.2, IBD. | 1.5 | | 02.01.1956 | |
| 18 GULFOOZ AKHTAR | 16 | | | |
| 19 GUL-E-NASREEN 04.12.1953 IMSG (I-X). SANG JANI (FA) | . 17 | MASOODA AZIZ | | |
| 20 SHAMSHAD BEGUM 02.09.1954 IMSG (I-VIII),S. F-7.4, IBD. | 18 | GULFOOZ AKHTAR | | |
| 21 PARVEER AHTAR 01.08.1956 JMSG (I-VIII) No.49,I-10/I 22 RUKHSANA TANVEER 14.05.1953 IMSG (I-V). MOHRI MUGHAL (FA) 23 ZAHIDA PARVEEN 03.02.1957 I MSG (I-V). MOHRI MUGHAL (FA) 24 SHAGUITA SHAHEEN 02.06.1955 I IMSG (I-V). MOHRI MUGHAL (FA) 25 NASIMAKHTAR 15.02.1954 IMS (I-V) No. 3, E-S 26 NAJMA YASMEEN 11.10.1955 JMS (I-V). NO.3, IBD. 27 RASHIDA YASMEEN 01.04.1955 JMS (I-V). NO.3, IBD. 28 RUKHSANA TARIQ, 05.09.1955 JMS (I-V). NO.49, I-10/I, IBD 29 SHAHIDA PARVEEN 01.01.1956 JMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 JMS (I-V). NO.40, I-10/I 31 SAMIA HANAN 15.12.1959 JMS (I-V). G-7. 3/I, IBD 32 SABIRA ASHFAQ KAZMI 19.12.1955 JMSG (I-X). PND PARCHA (FA) 33 SYEDA NASHEAN MARTAR 05.01.1957 JMS (I-V). O-7.1.1013. 34 NASIM AKHTAR 05.01.1957 JMS (I-V). O-7.1.1013. 35 BUSHRA KHANUM 15.10.1952 JMS (I-V). NO.49, IBD. 36 JOSPHIN YOURIS 04.01.1953 JMSG (I-V). DHALIALA (FA) 37 AZMAT UN NISA 16.10.1953 JMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA 10.05.1959 JMS (I-V). DHALIALA (FA) 40 GHAZALA YASMEEN 15.04.1958 JMS (I-V). PYC SHALA (FA) 41 RAZIA ZAMAN 16.12.1959 JMS (I-V). (J-7.2, IBD. 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-V). (J-7.2, IBD. | 19 | | | |
| 22 RUKHSANA TANVEER 14.05.1953 IMSG (I-V). MOHRI MUGHAL (FA) 23 ZAHIDA PARVEEN 03.02.1957 IMSG (I-V). MOHRI MUGHAL (FA) 24 SHAGUFTA SHAHEEN 02.06.1955 IMSG (I-V). MOHRI MUGHAL (FA) 25 NASIMAKHTAR 15.02.1954 IMS (I-V). NO. 3, E-S 26 NAJMA YASMEEN 11.10.1955 IMS (I-V). NO. 3, IBD. 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V). NO. 3, IBD. 28 RUKHSANA TARIQ, 03.09.1955 IMS (I-V). NO. 49, I-10/1, IBD 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V). NO. 40, I-10/1 31 SAMIA HANAN 16.12.1959 IMS (I-V). NO. 40, I-10/1 32 SABIRA ASHIFAQ KAZMI IS.12.1955 IMSG (I-V). NO. 40, I-10/1 33 TANIKA USGUM 15.02.1957 IMS (I-V). O. 7, 3/1, IBD. 34 NASIM AKHTAR 05.01.1957 IMS (I-V). O. 42, IBD. 35 JUSHRA KHANUM 15.10.1952 IMS (I-V). NO. 49, IBD. 36 JOSPHIN YOUNIS 04.01.1953 IMSG (I-V). DHALIALA (FA) 37 AZMAT UN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA 10.05.1959 IMS (I-V). DHALIALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMSG (I-V). PYC SHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V). (J-7.2, IBD. 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-V). (J-7.2, IBD. | 20 | | | |
| 23 ZAHIDA PARVEEN 03.02.1957 IMSG (I-V). MOHRI MUGHAL (FA) 24 SHAGUFTA SHAHEEN 02.06.1955 IMSG (I-X). UNIVERSITY COLONY 25 NASIM AKHTAR 15.02.1954 IMS (I-V) No. 3, E-S 26 NAJMA YASMEEN 11.10.1955 IMS (I-V). NO.3, IBD. 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V). NO.3, IBD. 28 RUKHSANA TARIQ, 03.09.1955 IMS (I-V). NO.49, I-10/1, IBD. 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V). NO.40, I-10/1 31 SAMIA HANAN 15.12.1959 IMS (I-V). C-7, 3/1, IBD. 32 SABIRA ASHFAQ KAZMI 19.12.1953 IMSG (I-X).PIND PARCEIA (FA) 33 FARIRA UBGUM 13.02.1967 IMS (I-V). NO.49, IBD. 34 NASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).C-6, I-2, IBD. 36 JOSPHIN YOURIS 04.01.1953 IMSG (I-V). DHALIALA (FA) 37 AZMAT UN NISA 16 10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA. 10.05.1959 IMS (I-V).PIC SHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).PIC SHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V).PIC SHALA (FA) 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-V).RO.30 IBD. | 21 | | | |
| 24 SHAGUFTA SHAHEEN 02.06.1955 I IMSG (I-X). UNIVERSITY COLONY 25 NASIMAKHTAR 15.02.1954 IMS (I-V) No. 3, E-3 26 NAJMA YASMEEN 11.10.1955 IMS (I-V). NO.3, IBD. 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V). G-7.1, IBD. 28 RUKHSANA TARIQ, 03.09.1955 IMS (I-V). NO.49, I-10/1, IBD 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V). NO.40, I-10/1 31 SAMIA HANAN 15.12.1959 IMS (I-V). G-7. 3/1, IBD. 32 SABIKA ASHFAQ KAZMI 19.12.1953 IMSG (I-X).PIND PARCHA (FA) 33 TARIKA UBGUM 13.02.1957 IMS (I-V).0-7.1.1015. 34 NASIM AKHTAR 05.01.1957 IMS (I-V).0-7.1.1015. 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).0-6.1-2, IBD. 36 JOSPHIN YOUNIS 04.01.1953 IMSG (I-V). DHALIALA (FA) 37 AZMAT UN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA: 10.05.1959 IMS (I-V). PIC SHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).PIC SHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V). OR PREMIND (FA) | 22 | RUKHSANA TANVEER | | |
| 25 NASIM AKHTAR 26 NAJMA YASMEEN 27 RASHIDA YASMEEN 28 RUKHSANA TARIQ, 29 SHAHIDA PARVEEN 30 SYEDA NASREEN AKHTAR 30 SYEDA NASREEN AKHTAR 31 SABIRA ASHFAQ KAZMI 32 SABIRA ASHFAQ KAZMI 33 TABIRA BEGUM 34 NASIM AKHTAR 35 BUSHRA KHANUM 36 JOSPHIN YOURIS 37 AZMAT UN NISA 38 SAFIA SULTANA 39 MUNAZA GUL 40 GHAZALA YASMEEN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 16.12.1959 41 IMS (I-V) NO. 3, E-S 41 IMS (I-V) NO. 3, IBD. 41 IMS (I-V) NO. 49, IBD. 42 RUKHSANA YASMEEN 41 IS.02.1953 41 IMS (I-V) DHALIALA (FA) 42 RUKHSANA YASMEEN 42 RUKHSANA YASMEEN 43 IMS (I-V) PYC SIHALA (FA) 44 RAZIA ZAMAN 44 RAZIA ZAMAN 45 RUKHSANA YASMEEN 46 RAZIA ZAMAN 47 RAZIA ZAMAN 47 RAZIA ZAMAN 48 PASHEEN 48 PASH SULTANA PASMEEN 49 RUKHSANA YASMEEN 40 CHAZALA YASMEEN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 41 PRAZIA ZAMAN 42 RUKHSANA YASMEEN 43 PASH SULTANA PASMEEN 44 RAZIA ZAMAN 45 RUKHSANA YASMEEN 46 PASH SULTANA PASMEEN 47 PASH SULTANA PASMEEN 48 PASH SULTANA PASMEEN 49 PASH SULTANA PASMEEN 40 PASH SULTANA PASMEEN 41 PRAZIA ZAMAN 42 RUKHSANA YASMEEN 44 PRAZIA ZAMAN 45 PASH SULTANA PASMEEN 46 PASH PASH PASH PASH PASH PASH PASH PASH | · 23 | ZAHIDA PARVEEN | | |
| 26 NAJMA YASMEEN 27 RASHIDA YASMEEN 28 RUKHSANA TARIQ, 29 SHAHIDA PARVEEN 30 SYEDA NASREEN AKHTAR 30 SYEDA NASREEN AKHTAR 31 SAMIA HANAN 32 SABISA ASHFAQ KAZMI 33 TABISA UBGUM 34 NASH AKHTAR 35 DUSHRA KHANUM 36 JOSPHIN YOURIS 37 AZMAT UN NISA 38 SAFIA SULTANA 39 MUNAZA GUL 40 GHAZALA YASMEEN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 42 RUKHSANA YASMEEN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 42 RUKHSANA YASMEEN 42 RUKHSANA YASMEEN 44 PASMEEN 45 RUKHSANA YASMEEN 46 DIAGATON NO. 1, 102. 103. 103. 103. 103. 103. 103. 103. 103 | 24 | SHAGUFTA SHAHEEN | 92.00.730 | |
| 27 RASHIDA YASMEEN 01.04.1955 IMS (I-V). G-7.1, IBD. 28 RUKHSANA TARIQ, 03.09.1955 IMS (I-V).NO.49, I-10/I, IBD 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V).NO.40, I-10/I 31 SAMIA HANAN 16.12.1939 IMS (I-V).G-7.3/I, IBD 32 SABIRA ASHFAQ KAZMI 19.12.1953 IMSG (I-X).PND PARCHA (FA) 33 TAHIRA UBGUM 15.02.1969 IMS (I-V).O-7.1.1015 34 NASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).NO.49, IBD. 36 JOSPHIN YOURIS 04.01.1953 IMSG (I-V). DHALIALA (FA) 37 AZMAT UN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA 10.05.1959 IMS (I-V). DHALIALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMSG (I-V). PYC SIHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMSG (I-V). PYC SIHALA (FA) 42 RUKHSANA YASMEEN 02.65.1962 FIMSG ILVANO/38, IBD. | 25 | NASIMIAKHTAR | 15.02.1954 | |
| 28 RUKHSANA TARIQ, 03.09.1955 IMS (I-V).NO.49, I-10/I, IBD 29 SHAHIDA PARVEEN 01.01.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V).NO.40, I-10/I 31 SAMIA HANAN 15.12.1959 IMS (I-V).G-7, 3/I, IBD 32 SABIRA ASHFAQ KAZMI 19.12.1953 IMSG (I-X).PIND PARCHA (FA) 33 TARIRA BEGIJM 15.02.1977 IMS (I-V).NO.49, IBD. 34 NASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).G-6.1-2, IBD. 36 JOSPHIN YOUNIS 04.01.1953 IMSG (I-V). DHALIALA (FA) 37 AZMAT UN NISA 16 10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA. 10.05.1959 IMS (I-V). PIC SIHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V). PIC SIHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V). (J-7.2, IBD. | 26 | NAJMA YASMEEN | 11.10.1955 | |
| 29 SHAHIDA PARVEEN 20.08.1956 IMS (I-V). KOT HATHIAL (FA) 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V).NO.40, I-10/1 51 SAMIA HANAN 52 SABIRA ASHFAQ KAZMI 59.12.1955 IMSG (I-V).C-7. 3/1, IBD 53 TABIRA BEGILM 13.02.1957 IMSG (I-V).C-7.1.1015. 54 NASIM AKHTAR 55 BUSHRA KHANUM 15.10.1952 IMS (I-V).NO.49, IBD. 56 JOSPHIN YOURIS 04.01.1955 IMS (I-V).No.7,G-7/3-3 57 AZMAT UN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 58 SAFIA SULTANA: 40.05.1959 IMS (I-V). PYC SHALA (FA) 59 MUNAZA GUL 20.05.1955 IMS (I-V).PYC SHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).PYC SHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V).Q-7.2, IBD. | 27 | RASHIDA YASMEEN | 01.04.1955 | |
| 29 SHAHIDA PARVEEN 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V).NO.40, I-10/1 31 SAMIA HANAN 32 SABIRA ASHFAQ KAZMI 33 PARIRA UBGUMI 34 NASIM AKHTAR 35 BUSHRA KHANUM 36 JOSPHIN YOURIS 37 AZMAT UN NISA 38 SAFIA SULTANA: 39 MUNAZA GUL 40 GHAZALA YASMEEN 41 RAZIA ZAMAN 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 40 GLAZINGS 40 SHASHAY YASMEEN 40 GLAZINGS 40 SHASHAY YASMEEN 40 GLAZINGS 40 SHASHAY YASMEEN 41 SHASHAY YASMEEN 41 SAFIAS ULTANA: 41 RAZIA ZAMAN 42 RUKHSANA YASMEEN 41 SAFIAS ULTANA YASMEEN 42 RUKHSANA YASMEEN 44 SULKHSANA YASMEEN 45 SAFIAS ULTANA YASMEEN 46 SUKHSANA YASMEEN 47 SUKHSANA YASMEEN 48 SUKHSANA YASMEEN 49 SHASHAYASMEEN 40 GLAZIA ZAMAN 40 GLAZIA ZAMAN 41 RAZIA ZAMAN 41 SAFIAS ULTANA YASMEEN 40 GLAZIA YASMEEN 41 SUKHSANA YASMEEN 41 SUKHSANA YASMEEN 42 RUKHSANA YASMEEN 43 SAFIAS ULTANA YASMEEN 44 SUKHSANA YASMEEN 45 SAFIAS ULTANA YASMEEN 46 SAFIAS ULTANA YASMEEN 47 SAFIAS ULTANA YASMEEN 48 SAFIAS ULTANA YASMEEN 49 SHASHAYASMEEN 40 SHASHAYASMEEN 40 SHASHAYASMEEN 41 SHASHAYASMEEN 41 SHASHAYASMEEN 41 SHASHAYASMEEN 41 SHASHAYASMEEN 41 SHASHAYASMEEN 42 SUKHSANA YASMEEN 41 SHASHAYASMEEN 42 SUKHSANA YASMEEN 43 SHASHAYASMEEN 44 SHASHAYASMEEN 45 SHASHAYASMEEN 46 SHASHAYASMEEN 47 SHASHAYASMEEN 48 SHASHAYASMEEN 49 SHASHAYASMEEN 49 SHASHAYASMEEN 49 SHASHAYASMEEN 41 SHASHAYASMEEN 42 SHASHAYASMEEN 43 SHASHAYASMEEN 44 SHASHAYASMEEN 45 SHASHAYASMEEN 46 SHASHAYASMEEN 47 SHASHAYASMEEN 48 SH | 28 | RUKHSANA TARIQ. | 03.09.1955 | |
| 30 SYEDA NASREEN AKHTAR 20.08.1959 IMS (I-V).NO.40, I-19/I 51 SAMIA HANAN 15.12.1959 IMS (I-V).G-7. 3/I, IBD 72 SABIRA ASHFAO KAZMI 39.12.1953 IMSG (I-X).PIND PARCHA (FA) 73 TAHRA BEGUM 15.02.1957 IMS (I-V).NO.49, IBD. 34 NASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).NO.49, IBD. 36 JOSPHIN YOUNIS 04.01.1953 IMSG (I-V) No.7,G-7/3-3 37 AZMATUN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA. 10.05.1959 IMS (I-X). G-8.4, IBD. 39 MUNAZA GUL 20.05.1955 IMS (I-V).PYC SIHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-X). AYORPUR SHAHAN (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-X). AYORPUR SHAHAN (FA) 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-X).NO.38 IBD. | | SHAHIDA PARVEEN | 01.01.1956 | |
| SAMIA HANAN 15.12.1959 IMS (I-V).G-7.3/1, IBD SABIRA ASHFAQ KAZMI 19.12.1953 IMSG (I-X).PIND PARCHA (FA) SABIRA UUGUM 15.02.1957 IMS (I-V).D-7.1.1915. MASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. SEUSHRA KHANUM 15.10.1952 IMS (I-V).G-6.1-2, IBD. JOSPHIN YOUNIS 04.01.1953 IMSG (I-V). DHALIALA (FA) 38 | <u></u> | | 20.08.1959 | IMS (I-V).NO.40, I-10/1 |
| 19.12.1953 IMSG (I-X).PIND PARCHA (FA) 13.02.1967 IMSG (I-X).PIND PARCHA (FA) 13.02.1967 IMSG (I-X).PIND PARCHA (FA) 14.02.1967 IMSG (I-X).PIND PARCHA (FA) 15.02.1967 IMSG (I-X).PIND PARCHA (FA) 16.02.1967 IMSG (I-X).PIND PARCHA (FA) 17.02.1967 IMSG (I-X).PIND PARCHA (FA) 18.02.1967 IMSG (| | L | 15,12,1959 | IMS (I-V).G-7. 3/1, IBD |
| TAPURA BEGUM 13.02.1957 HAS (I-V).NO.49, IBD. | | | | HMSG (I-X) PARCHA (FA) |
| 34 NASIM AKHTAR 05.01.1957 IMS (I-V).NO.49, IBD. 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).G-6.1-2, IBD. 36 JOSPHIN YOUNIS 04.01.1953 IMS (I-V) No.7,G-7/3-3 37 AZMAT UN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA 10.05.1959 IMS (I-V). PYC SIHALA (FA) 39 MUNAZA GUL 20.05.1955 IMS (I-V).PYC SIHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).Q-7.2, IBD. 41: RAZIA ZAMAN 16.12.1959 IMS (I-V).Q-7.2, IBD. 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-V).NO.3X IBD. | | | | 845 (6Y),0-7,1,10D. |
| 35 BUSHRA KHANUM 15.10.1952 IMS (I-V).G-6.1-2, IBD. 36 JOSPHIN YOUNIS 04.01.1953 IMS (I-V) No.7,G-7/3-3 IMS (I-V) No.7,G-7/3-3 AZMAT UN NISA 16.10.1953 IMSG (I-V). DHALIALA (FA) 10.05.1959 IMS (I-X). G-8.4, IBD. 10.05.1959 IMS (I-V).PYC SIHALA (FA) 10.05.1955 IMS (I-V).PYC SIHALA (FA) 15.04.1958 IMS (I-V).PYC SIHALA (FA) 16.12.1959 IMS (I-V).PYC SIHALA (FA) | } | | | |
| 36 JOSPHIN YOUNIS 04.01.1953 IMS (I-V) No.7,G-7/3-3 37 AZMAT UN NISA 16 10.1953 IMSG (I-V). DHALIALA (FA) 38 SAFIA SULTANA. 10.05.1959 IMS (I-X). G-8.4, IBD. 39 MUNAZA GUL 20.05.1955 IMS (I-V).PYC.SIHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-V).PYC.SIHALA (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V).G-7.2, IBD. 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-V).NO.38 IBD. | • | | | |
| 37 AZMAT UN NISA 16 10.1953 IMSC (I-V). DHALIALA (FA) 38. SAFIA SULTANA. 10.05.1959 IMS (I-X). G-8.4, IBD. 39. MUNAZA GUL 20.05.1955 IMS (I-V). PYC SIHALA (FA) 40. GHAZALA YASMEEN 15.04.1958 IMS (I-X). YOORPUR SHAHAN (FA) 41. RAZIA ZAMAN 16.12.1959 IMS (I-V) (I-7.2, IBD. 42. RUKHSANA YASMEEN 02.05.1962 FIMS (I-V) (I-V | | | | |
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| 39 MUNAZA GUL 20.05.1955 IMS (I-V).PYC SIHALA (FA) 40 GHAZALA YASMEEN 15.04.1958 IMS (I-X). YOORPUR SHAHAN (FA) 41 RAZIA ZAMAN 16.12.1959 IMS (I-V) (I-7.2, IBD. 42 RUKHSANA YASMEEN 02.65.1962 FIMS (I-V) (I-7.2, IBD. IBD. 18.04.1959 IMS (I-V) (I-7.2, IBD. IBD. 19.04.1959 IMS (I-V) (I-7.2, IBD. IBD. IBD. IBD. 19.04.1959 IMS (I-V) (I-7.2, IBD. IB | | | | |
| 40 GHAZALA YASMEEN 15.04.1958 IMS (I-X). YOORPUR SHAHAN (FA) 41. RAZIA ZAMAN 16.12.1959 IMS (I-V) (I-7.2, IBD. 42 RUKHSANA YASMEEN 02.05.1962 FIMS (I-V) NO.3% IBD. | | , | | |
| 41: RAZIA ZAMAN 16.12.1959 IMS (I-V) (7-7.2, IBD. 42: RUKHSANA YASMEEN 02.65.1962 FIMS (I-V) (3 IBD. | | | | |
| 42 RUKHSANA YASMEEN 02.65.1962 FIMS (LY) NO.3% IBD. | | | | |
| 72 (UKISANA 1 AMADON | 4!- | | | |
| | 42 | RUKHSANA YASMEEN | 02.65.1962 | ; |

Principal I.M.3 for Girls (I-X) ara Syedan (F.A) Islamabad

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|----------------------------|---------------|---------------------------------------|
| SASHIR | 24.2.1974 | IMS (I-V), G-8/1 |
| NA KAUSAR | 6.6.1975 | IMSG (I-X), NOORPUR SHAH. |
| MA BIBI | 14.5.1985 | IMS (I-V) G-6/2 |
| MA BIOI | 18.4.1984 | IMS (I-V), G-11/I |
| SADIA HAYAT | 28.12.1983 | IMSG (I-X), Pungran |
| SADIA HATAT | 3.7.1979 | IMSG (I-X), P.E. G-5 |
| 789 GHULAM SUGHRA | 03-07.1975 | IMSG (I-X), PIND MALKAN |
| | 2.5.1986 | IMSG (I-X), CHAKSHEHZAD |
| | 1.1.1981 | IMSG (I-V), DHOK JERANI |
| 591 QUDSIA RAJAB TUNIO. | 14.01.1984 | IMSG (I-V) PIND BEGWAL |
| 592 TAHIRA JABEEN | 14.01.1704 | IMSG (I-X), BADAI QADIR |
| S93 RAZIA NAKGIS | 13.8.1971 | BAKHSH |
| 59: FARZANA NASRULLAH KHAN | 01.04.1974 | IMSG (I-X) JAGIOT (IFA) |
| 595 GHULAM FATIMA | 17.04.1974 | IMSG (I-V) Severa |
| 596 UZMA KHAN | 14.10.1976 | IMS (I-V) G-7/4 |
| 597 MUSSARAT SHAHEEN | 06.08.1985 | IMSG (I-X) GAGRI |
| 598 ZAIB UN NISA | 3 05.04.1982 | IMSG (I-V) Kot Hatyal |
| 599 TASLEEM AKHTAR | 04.04.1959 | IMSG (I-V), MOHRIAN (FA) |
| GOO ASMA ASHFAQ | 18.03.1981 | IMS (I-V) E-7/4 |
| 601 BUSHRA AZIZ. | 12.07.1974 | IMSG, Pind Pracha (FA) |
| 602 SHAISTA BIBI | 10.11.1975 | IMSG (I-X) Dhoke Gangal |
| 603 SHEEBA NAZ | 02.03.1984 | IMSG (I-X) Humak |
| 601 FOZIA SIDDIQUE | · `01.01.1978 | IMSG (I-X) Humak |
| 605 MUKHTIAR BEGUM | 01.04.1976 | IMSG (I-V) Pcija |
| 606 SAMINA SALEEM AWAN | | IMSG (I-V) Peija |
| <u></u> | | |

- 2. The teachers working on deputation to other Departments from FDE will be considered for promotion on joining their parent department i.e. FDE.
- The seniority of EST (BS-14) will be determined as per Civil Servants (Seniority) Rules, 1993.
- 4. This issues with the approval of Director General, FDE.

(Dr. Sped Tajanmud-Hussain Shah)
Director Schools (Female)

Distribution:

- i. AGPR, Islamabad
- ii. PS to Secretary, CA&DD
- iii. PA to Joint Educational Advisor, CA&DD
- iv. PS to DG, FDE
- v. Director (A&C), FDE
- vi. All AEO's
- vii. All Heads of Institution
- viii. Teachers concerned
 - ix. Personal Files

(Rinsat Ali)

Administrative Officer (Female)

. . .M.3 for Girls (I-X)

Syedan (F.A) Islamabad

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUN KHWA, PESHAWAR

Notification

Consequent upon the approval of the departmental promotion committee (DPC) meeting held on 07/08/2012, the following assistants/stenographers of Elementary & Secondary Education Department are hereby promoted/adjusted as regular superintendents/budget & Accounts Officers (B-16) in the interest of Public Service with immediate effect.

| S/No | Name & Designation | From | Promoted as | Remarks |
|-------------|-----------------------|---------------------|------------------------|------------------|
| 1 | Almas Khan | Directorate E&SE, | Supdt: Estt: | Already Occupied |
| | Stenographer | Khyber Pakhtun Khwa | Directorate E&SE, | |
| | 4 | | K/Pakhtun Kha | |
| 2 | Sher Malik | AEO Mohammad | Services Placed at the | disposal of DE |
| <u> </u> | Assistant | | (FATA) Peshawar for | |
| 3 | Mohammad Ashiq | EDO (E&SE) | EDO (E&SE) | Against Vacant |
| | Assistant | Abbotta Abad | Batagraam | Supdt post B-16 |
| 4 | Amanullah | EDO (E&SE) Tank | EDO (E&SE) Hangu | Against Vacant |
| | Assistant | | | Supdt post B-16 |
| 5 | Mohammad Ilyas | EDO (E&SE) Haripur | EDO (E&SE) | Against Vacant |
| | Assistant' | | Kohistan | Supdt post B-16 |
| 6 | Nauman Ud Din | RITE (F) Bannu | EDO (E&SE) Hangu | Against Vacant |
| | Assistant | - | | Supdt post B-16 |
| 7 | Altaf Hussain | EDO (E&SE) | EDO (E&SE) | Against Vacant |
| | Assistant | Abbotta Abad | Battagraam | Supdt post B-16 |
| 8 | Muhammad Ismail | RITE (F) D.I. Khan | EDO (E&SE) Karak | Against Vacant |
| | Assistant | | | Supdt post B-16 |
| 9 | Ibrahim Assistant | EDO (E&SE) | DDO (F) Dir Upper | Against Vacant |
| | | Nowshera | | Supdt post B-16 |
| 10 | Abdul Tamim | Directorate (E&SE) | DDO (M) Buner | Against Vacant |
| | Assistant | Khyber Pakhun Khwa | | Supdt post B-16 |
| 11 | Saidul Israr | RITE (MO Thana) | EDO (E&SE) Swat | Against Vacant |
| | Assistant | | | Supdt post B-16 |
| 12 | Khadim Shah | EDO (E&SE) | DDO (F) Timargara | Against Vacant |
| | Assistant | Charsadda | | Supdt post B-16 |
| 13 | Sanaullah | DDO (F) Swabi | EDO (E&SE) Swat. | Against Vacant |
| | Assistant | | , , , | Supdt post B-16 |
| 14 | Habib Aslam | EDO (E&SE) Mardan | EDO (E&SE) | Against Vacant |
| | Assistant | , , , | Kohistan | Supdt post B-16 |
| 15 | Rahim Khan | EDO (E&SE) Swat | EDO (E&SE) Swat | Against Vacant |
| 1 | Assistant | - (=====) | == 0 (2,02), 0 | Supdt post B-16 |
| 16 | Jamshed Khan | EDO (E&SE) Swat | DDO (M) Timargara | Against Vacant |
| | , | | 220 (m) rimargara | |
| | | | | Supdt post B-16 |

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| 17 | Sheikh AmanUllah | EDO (E&SE) D.J Khan | EDO (E&SE) | Against Vacant |
|----------|------------------|---------------------------------------|--------------------|-----------------|
| <u> </u> | | | D.I Khan | Supdt post B-16 |
| 18 | Irshad Muhammad | EDO (E&SE) Swat | EDO (E&SE) | Against Vacant |
| | | | Dir Upper | Supdt post B-16 |
| 19 | Abdul Wadood | EDO (E&SE)Chitral | EDO (E&SE) Chitral | Against Vacant |
| | | | | Supdt post B-16 |
| 20 | Abdul Wadood | EDO (E&SE) Swat | EDO (E&SE) Karak | Against Vacant |
| 1 | | | | Supdt post B-16 |
| - 21 | Zubair Muhammad | EDO (E&SE) Swat | EDO (E&SE) | Against Vacant |
| | | · · · · · · · · · · · · · · · · · · · | Shangla | Supdt post B-16 |
| 22 | Mukamil Khan | Directorate (E&SE) | DDO (M) Wari Dir | Against Vacant |
| ¥ , | | K/Pakhtun Khwa | | Supdt post B-16 |
| 23, | Shamsur Rahman | Directorate (E&SE) | EDO (E&SE) Kohat | Against Vacant |
| | | K/Pakhtun Khwa | | Supdt post B-16 |

Note

1. Charge report should be submitted to all concerned.

(Muhammad Rafiq Khattak) DIRECTO

Endst: No. 612.52/A.23/MS/Promoted/Adjuste/2012, detail Peshawar the 02/08/2012 copy of the above forwarded to the:

- 1. PS to Minister for Elementary & Secondary Education Department K/Pakhtun Khwa.
- 2. PS to Secretary Govt of Khyber Pakhtun Khwa Elementary & Secondary Education Department.
- 3. Director Curriculum & Teachers Education Khyber Pakhtun Khwa Abbatta Abad.
- 4. Director of Education (FATA) Peshawar.
- 5. Director Provincial Institute of Teachers Educ: Khyber Pakhtun Khwa Peshawar.
- 6. Accountant General Khyber Pakhtun Khwa Peshawar.
- 7. District Accounts Officers Concerned:
- 8. Agency Accounts Officers Concerned:
- 9. Executive District Officers (E&SE) Concerned.
- 10. Agency Education Officers Concerned.
- 11. Deputy District Officer (E&SE) Concern d.
- 12. Superintendents Concerned.
- 13. PA to Director Elementary & secondary Edu: Khyber Pakhtun Khwa Peshawar.
- 14. PA to Additional Director (Estt) & (Dey) local office.
- 15. Master file.

Deputy Directory (E&SE)

بعدالت مرسمونولی _

مورند مورند

باعث تحربية نكه

مقدمه مندرج عنوان بالا میں اپی طرف سے واسطے پیروی وجواب وہی وکل کلروائی متعلقہ ان مقام مرص کیلئے محصوص کی مقدمہ کی کل کاروائی کا کا کل اختیار ہوگا۔ نیز مقررکر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کا کل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ کرنے وتقر را لانے و فیصلہ پر صلف دیئے جواب وہی اورا قبال وجوئی اور مصورت وگری کرنے اجراء اوروصولی چیک ورو بیدار عرضی وعوی اور درخواست ہرتم کی تصدیق زرایں پر دشخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرفہ یا بیل کی برامدگ اور مندوخی نیز دائر کرنے اپیل تکرائی ونظر نانی و بیروی کرنے کا مختار ہوگا۔ ازبصورت ضرورت مقدمہ ندکور کے کل یا جزوی کاروائی کے واسطے اوروکیل یا مختار قانونی کوایے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کوبھی وہی جملہ ندکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختہ منظور و تبول ہوگا دور ان مقدمہ میں جوخر چہ ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیٹی مقام دورہ پر ہو یا حدسے باہر ہوتو و کیل صاحب یا بند ہول کے سبب سے وہوگا۔ کوئی تاریخ پیٹی مقام دورہ پر ہو یا حدسے باہر ہوتو و کیل صاحب یا بند ہول

عدالمار پوک ہشتا معا

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service appeal No: 1469/2012

jamshed Khan P.S.T

.....Appellant

Versus

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, & others.

.. Respondents

<u>PARAWISE COMMENTS/REPLY FOR AND ON BEHALF OF THE RESPONDENTS</u> Respectfully Sheweth:-

PRELIMINARY OBJECTIONS.

- 1 That the appeal is badly time barred.
- 2 That the appellant has no cause of action/locus standi.
- 3 That the appellant has not come to this Hon! able court with clean hands.
- 4 That the appeal is not maintainable in its present form.
- 5 That the appellant has concealed important material facts from this Hon! able court.
- 6 That the appellant has filed this appeal with malafide motives.
- 7 That the instant appeal has been filed to pressurize the respondents.
- 8 That the present appeal is bad for non joinder/ mis joinder of necessary parties.
- 9 That the appellant is not competent to file the instant appeal against the respondents.
- 10 That the appellant has no cause of action/locus stand.
- 11 That the appellant has not submit any departmental appeal.
- 12 This Hon! able Tribunal has no jurisdiction to adjucate the present appeal, as it does not fall with in ambit of Section-4 of Service Tribunal Act 1974.
- 13 That the Rule 3(2) of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) rule 1989 authorize the department to laid down the method of appointment, qualification & other condition applicable to the post in consultation with the Estab: & Admn: Department & Finance department. Hence the present appeal is liable to be dismissed.
- 14 That it was observed by the apex court that it is exclusively within the domain of the Government to decide whether a particular qualification will be considered sufficient for promotion from a particular grade and it is also within the domain of the govt: to change the above policy from time to time as no body can claim any vested right in the policy

ON FACTS

- 1 This para pertains to service record of the appellant. Hence no comments.
- 2 As replied in para above.
- Incorrect. According to the present recruitment rules/policy the basic qualification of PST teacher BPS-12 are as under:-

a. Intermediate or equivalent qualification from a recognized Board with Primary School teacher certificate/diploma in Education from a recognized institute.

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b.SSC from a recognized board in 2nd division with 2 years Associate Degree in Education from a recognized University.

Hence this para is denied.

- This para pertains to the amended rules where in the department has enhanced the method of appointment, qualification applicable to PST post in consultation with the Establishment & Admn: Department & Finance. While it would not out of place to mention here that the same rules/policy never challenged /objected by the appellant before any forum.
- Incorrect, the said rules were amended on 13/10/2012 in accordance with rules, law on the subject to enhance efficiency in service, by the competent authority.
- 6 Incorrect, the statement of the appellant in this para is without any documentary proof, baseless and against the facts.
- 7 The said rules were notified on 13/11/2012 in pursuance of the provisions contained in
- 8 Sub: rule(2) of rule(3) of Khyber Pakhtunkhwa Civil Servant/appointment, promotion & transfer) rules 1989, in consultation with Estab: Department & Finance Department.
- 9 The department shall follow the rules/policy in vogue at the time of upgradation /promotion of teachers,
- 10 Incorrect & not admitted. The statement of the appellant in this para is baseless, against the facts, law, rules, policy in vogue, norms of justice and also based on malafide motives. However, it would not be out of place to mention here that it was also held by the Apex Court that the govt: has the right to enhance the qualification and standard of recruitment and promotion in order to maintain efficiency in service.
- 11 Incorrect. The statement of the appellant is without any legal support, against norms of natural justice. How it can be possible to treat SSC on equal footing with intermediate and other higher qualifications, as well as 3rd division with Ist: division. Hence the whole para is denied.
- 12 As replied in para 9 & 10 above.
- 13 The said application was against the existing rules hence filed.
- 14 Incorrect, the appellant has no cause of action/Prima facie, hence the appeal in hand is liable to be dismissed on the following grounds inter alia.

ON GROUNDS

- A Incorrect and not admitted. The statement of the appellant is against the existing rules & policy. The appellant is not deprived from any legal, lawful benefits. Hence denied. Moreover, it would not be out of place to mention here that the govt: has legal right to enhance the qualification and standard of recruitment in order to maintain efficiency in service. Moreover, the appellant does not possess the required qualification for promotion, neither the appellant enhanced his own academic qualification during the long tenure of his service.
- B As replied in foregoing paras. The statement of the appellant is also against facts, rules, policy & norms of justice hence denied.

- Incorrect. At the time of appointment of the appellant and his mentioned colleagues, there was exist/prevail no promotion/up gradation scheme for PST teacher except Selection grade. The scheme of selection grade has also been discontinued by the government. Hence the statement of the appellant in this para is baseless, without any proof and manufactured one, hence denied.
- D Incorrect & not admitted. The experience of PSTs are not ignored as evident/obvious from para 7 of the facts of this appeal. Hence the whole par is denied.
- E Incorrect & not admitted. The notification date 13/11/2012 is issued in pursuant of provisions contained in Sub: Rule-2 of Rule (3) of Khyber Pakhtunkhwa Civil servants(Appointment, Promotion & Transfer rules) 1989, hence legal and lawful.
- F. Incorrect, the appellant possessing SSC has no right to be treated equally with those PSTs having FA/F.Sc. While it is also pertinent to mention here that it is with in domain of the government to change the policy from time to time as nobody can claim vested sigh in the policy as held by the Apex Court, hence denied.
- Incorrect. The rules framed by Federal Government and rules framed for other cadre are not applicable to PST cadre in the provinces of Khyber Pakhtunkhwa hence the whole para is denied being baseless, against facts, law rules in vogue and against the natural justice. Moreover the respondents seek the permission of this Hon! able Tribunal to adduce more grounds at the of hearing.

In view of the above made submissions, it is humbly requested that this Hon! able Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the respondents Department.

Director

Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

Secretary

Elementary & Secondary Education

KPK Peshawar

Secretary

Govt: of Khyber Pakhtunkhwa, Finance Department, Peshawar.

Secretary

Govt: of Khyber Pakhtunkhwa, (Estab:) Department, Peshawar.