

31.05.2016

Counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) alongwith Mr. Usman Ghani, Senior 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


MEMBER


MEMBER

29.1.2014

vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 27.3.2014.

READER

27-3-14

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 27-5-14.

READER

27-5-14

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 27-8-14.

READER

27-8-14

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 25-11-14.

READER

25-11-14

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 4-2-15.

READER

4-2-15

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 23-4-15.

READER

23-4-15

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 19-10-2015.

READER

Vide order sheet dated 29.1.2014 in connected appeal No. 631/2013, this appeal is adjourned to 3-17-15.


READER

Appeal No. 634/2013.
Mst. Shahnaz Bilei

27.08.2013


Appellant with counsel present and heard on preliminary.

Contended that the appellant has not been treated in accordance with the law/rules. He further contended that similar nature of cases have already been admitted to regular hearing. In this respect he referred to one in service appeal No.1322/12 titled Ikramullah vs Govt which has been fixed for hearing before the Hon'ble Final Bench-ii on 10.10.2013. On the same analogy the instant appeal also admitted for regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notice be issued to the respondents. Case adjourned to 03.12.2013 for submission of written reply before Final Bench-II.


Member.

3.12.2013

Junior to counsel for the appellant present. Security and process fee deposited late, therefore, notices could not be issued. Notices be issued to the respondents and case to come up for written reply on 29.1.2014.


MEMBER

3.6.2013

Munshi to Counsel for the appellant present.

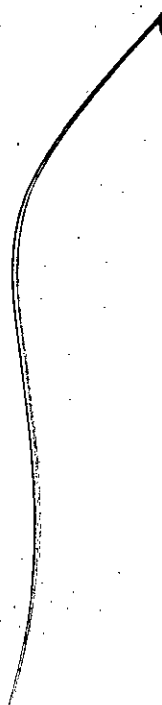
In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 19.6.2013.

bp
Reader

4. 19.6.2013

None for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 27.8.2013.


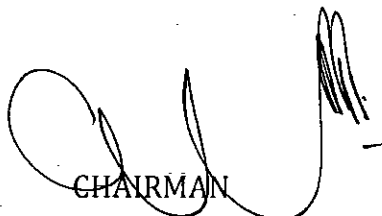
GM
Reader



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 634/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/04/2013	<p>The appeal of Mst. Shahnaz Bibi presented today by Mr. Shams-ul-Hadi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	22-4-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>3-6-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 634/2013

Shahnaz Bibi.....Appellant

V E R S U S

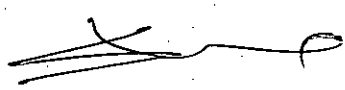
Government of Khyber Pakhtunkhwa through Secretary
Education, Peshawar and others.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Memo of Appeal		1-8
2.	Affidavit		9
3.	Addresses of the Parties		10
4.	Copy of the Notification issued by the Government	A	11
5.	Copies of service book and Notification dated 13/11/2012	B&C	12-40
6.	Copy of representation	D	41-44
7.	Wakalat Nama		41

Shahnaz
Appellant

Through


Shams-ul-Hadi
Advocate High Court,
Peshawar.
Office: 2nd Floor, Bangush
Plaza Khyber Super Market,
Peshawar Cantt.
Cell No. 0313-9772262

①

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 634/2013

K.P. Tribunal
Case No. 739
Dated 12-4-13

Shahnaz Bibi PST

GPS Village Rega Tehsil Daggar a District Buner.....Appellant

V E R S U S

1. Government of Khyber Pakhtunkhwa through Secretary Education, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Civil Secretariat, Peshawar.
4. Director Elementary & Sedentary Education Khyber Pakhtunkhwa, Peshawar.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA 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 appellant is belonging to the Education Department, all serving on the posts as mentioned against her name in the heading of the appeal.
2. That the appellant has got at her 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 along with the PST Certificate from a recognized Institution and the appellant appointed on the above said post having the said qualification as was the requirement at the time of the appointment of the appellant.
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 later on 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 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-cum-fitness 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. (Copies of service book and 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 the appellant is also equally entitled to be upgraded on the basis of his tenure of service and be given the

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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 be any means made the basis for giving any sort of above said benefit to the teachers.

12. That in this respect the appellant has also moved their representation to the concerned authority, thereby explaining their grievance, however no response whatsoever has yet been received by the appellant till the filing of this Service Appeal. (Copy of representation is attached as annexure "C").

13. That the appellant got no other efficacious/ adequate now approaches this Hon'ble Tribunal on the following grounds amongst the others:

GROUND:

A. That act of the respondent department, thereby depriving the appellant 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.

B. That since hundred and hundreds of the teachers have been treated in a discriminatory manner and have been

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deprived of the above said benefit mere on the ground that they are not having the qualification of F.A/F.Sc 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 F.A/F.Sc with PST, hence no privilege can be granted to the persons, whom have been appointed on the prescribed qualification.

C. That the appellant has 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 the appellant has been waiting for her turn to be promoted/ upgraded to some higher scale, however after having a tenure of such a long legitimate expectations the appellant has been treated unlawfully without any cogent/ solid grounds.

D. That it is very respectfully submitted it has never happened that in the cases of upgradation/promotion the factor of seniority should be abolished/ ignored totally and the grounds of upgradation/ promotion should be made mere educational qualification, whereas the

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. (Copy of Notification dated 13/11/2012 is attached as annexure "D").

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G. That it will be pertinent to bring into the notice of this Hon'ble Tribunal that the above said benefit has also been extended to the Clerk's community, whereby the clerk's even with the Martric 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.

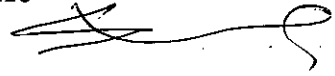
It is, therefore, prayed that on acceptance of this Service Appeal the respondents may please be directed to set-aside the term of:

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

and the appellant 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 circumstances of the case may also be granted.

Shahwaz
Appellant



Through

Shams-ul-Hadi
Advocate High Court,
Peshawar.

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BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2013

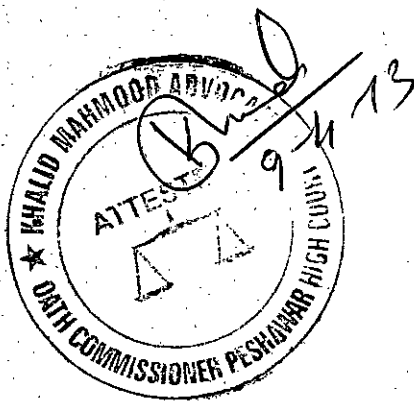
Shahnaz Bibi.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary Education, Peshawar and others.....Respondents

AFFIDAVIT

I, **Shams-ul-Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE

(10)

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2013

Shahnaz Bibi.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
Education, Peshawar and others.....Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

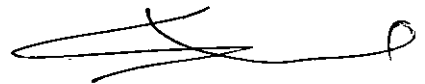
Shahnaz Bibi PST
GPS Village Rega Tehsil Daggar a District Buner.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Education, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Civil Secretariat, Peshawar.
4. Director Elementary & Sedentary Education Khyber Pakhtunkhwa, Peshawar.

Appellant

Through



Shams-ul-Hadi
Advocate High Court,
Peshawar.

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Annex A

8.	SST/SST Teacher/Agri with requisite experience rename Sr. SST/Sr. SST Teacher/Sr SST Agri BPS-16	Unile-govt with 30% in 1st 2 nd Division and 10% in 3 rd Division M.A./M.Sc at least 2 nd Division with B.Ed. M.Ed/M.A. Education equivalent qualification	17
9.	DPE BPS-16	M.Sc. at least 2 nd division in (HPE)	17

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2. 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)

End of even No. & date.

Copy for information & necessary action to:-

1. 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.

[Handwritten Signature]

Attest
 SHEIKH
 AMMAD
 copy
 AMMAD

[Handwritten Signature]
 ATTESTED

Better Copy (11)

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

(17)

A
(14)

To

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 Minister NWFP has been pleased to upgrade 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 Pay Scale	Qualification	Revised Pay Scale
1	Primary School Teacher PST BPS-09	F.A / FSc at least 2 nd Division with PTC/ Diploma in Education	09
2	PST with requisite experience renamed as Head Teacher/ head Mistress of Rprimary School BPS-09	On the basis of 10 years service experience as Primary School Teacher in BPS-09	12
3	C.T BPS-09	B.A. BSc at least 2 nd Division with Diploma in Education/CT	15
4	AWICT Technical Industrial Arts/ Home Economics BPS-09	B.A/ BSc at least 2 nd Division with Diploma in Education/ Certificate from Directorate of Curriculum and Teachers Education NWFP Abbottabad in Agro Tech/ Industrial Arts Home Economics.	15
5	D.M BPS-09	B.A/ B.Sc at least 2 nd Division with Drawing Master Course	15
6	PET BPS-09	B.A/ BSC at least 2 nd Division with JDPE	15

(Signature)

certified that Mrs. Shah-Naz D/o Nanda
is a bonafide resident of village Reza
Sub-tehsil Gajra Distt Buner.


Head master,
Govt. High School,
Gajra Distt Buner.

Attd as verified above.



23.8.77



13

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) PRIMARY BUNER AT SOWAR.

APPOINTMENTS:-

The following P.T.C.untrained candidates are hereby appointed temporarily as P.T.C.mistresses at the schools noted against each in the vacant/newly created P.T.C.posts in BPS No.7 (Rs.1480-81-2695) plus usual allowances as admissible under the Rules with effect from date of their taking over charge in the interest of public service subject to the following terms and conditions.

S.No.	Name, Qualification and adress.	Name of school where appointed.	Remarks.
<u>PF-64 Buner.</u>			
1.	Hadlya Begum D/O Bahru Ullum.Gokand.	GGPS Manyari.	Vacant post.
2.	Nasrat Begum D/O Shahzaman Khan.Sultanwas.	GGPS Sultanwas.	"
3.	Rumania D/O Husainullah. Daggar.	GGPS Toorwarsak.	"
4.	Shamim Akhtar D/O Shahzaman Khan.Sultanwas.	GGPS Char.	"
5.	Nodhad Bibi D/O Nazir Ahmad.Gulbandi.	GGPS Bar Tiraj.	"
6.	Jehan Ara D/O Hazrat Malook. Batara.	GGPS Tangora.	"
7.	Mirdar Kumari D/O Jamna Das. Pacha.	GGPS Char.	"
8.	Nizakat Bibi D/O Saidullah Khan.Gokand.	GGPS B.Gokand.	"
9.	Raziat Bibi D/O Shamsul Haq.Sultanwas.	GGPS Toorwarsak.	"
10.	Pervaish Kumari D/O Bagat Ram. Daggar.	CMS Bampukha.	"
11.	Naheed Begum D/O Mohd:Khan. Bagra.	GGPS K.Gokand.	"
12.	Gul Bano D/O Azizur Rehman. Bampukha.	CMS Bampukha.	"
13.	Bakht Maryam D/O Mohd:Yousaf.Fisar.	GGPS B.Gokani.	"
14.	Shahnaz Begum D/O Mohd:Bashir.Pacha.	GGPS Beshownai(SAP)	"
15.	Shazia Begum D/O Ghani Rehman.Pacha.	GGPS Bazargai.	"
16.	Kausar Behan D/O Amir Zarin.Elai.	GGPS Toorwarsak.	"
17.	Bakht Jehan D/O Suleeman.Gulbandi.	GGPS Maigano Maira.	"
18.	Ruhsana D/O Noorullah Khan.Karapa.	CMS Bampukha.	"
19.	Fahmiya Begum D/O Fazal Rehman.Khail.	GGPS Salarzo Maira.	"
20.	Akleem Akhtar D/O Ayub Khan.Kulyari.	GGPS Bar Tiraj.	"
21.	Aysha Bibi D/O Mursaleen. Totalai.	GGPS Bazargai.	"
22.	Ziaun Niso D/O Mohd:Ibrahim.Totalai.	GGPS Bazargai.	"
23.	Naheed Perveen D/O Pervaiz. Bajkata.	CMS Bampukha.	"
24.	Nishto Bibi D/O Bacha Khan. Rega.	GGPS Leganai.	"
25.	Zakia Begum D/O Iqbal Ahmad Jan.Chinglai.	GGPS Jowar.	"
26.	Shahnaz D/O Fazal Muhammad. Bajkata.	GGPS Kohay.	"
27.	Hashmat Begum D/O S.Mughafil Shah.Dagai.	GGPS Kohay.	"
28.	Zebun Nisa D/O Habibullah Khan.Regga.	GGPS MshseerMaira.	"
29.	Husna Bibi D/O Fathul Jamil. Kowga.	GGPS Ashezo Maira(SAP)	"
30.	Fazeelat D/O Mohd:Amin.Shalbandi.	GGPS Ashezo Maira(SAP)	"
31.	Aysha D/O S.Laiq Shah. Bajkata.	GGPS Chano Bazarkot.	"
<u>PF-63 Buner.</u>			
32.	Weera Wanti Kure D/O Hans Raj.Ghurghush:	GGPS Badair.	"
33.	Safiya Begum D/O Iqbal Ahmad Jan.Chinglai.	GGPS Langar(Amazi)	"
34.	Basmin D/O Gul Hasan. Totalai.	GGPS Kangalal.	"
35.	Tarwant Kuri D/O Navendar Lal. Churghush:	GGPS Hall.	Vacant.
36.	Fatima Bibi D/O Mirza Shah. Ambela.	GGPS Cheena.	"
37.	Zahida Bibi D/O Zairat Khan. Kalpani.	GGPS Rega.	"
38.	Shamim Ara D/O Sher Jang. Totalai.	GGPS Charorai.	"
39.	Fatima Bibi D/O Khan Sher. Koskorona.	GGPS Mangal Tana.	"
40.	Kulsam Akhtar D/O Zarin Shah. Wake Abad.	GGPS Nari Tangi.	"
41.	Shahraz Begum D/O Nadar Khan. Rega.	GGPS Rega.	"
<u>PF-64 Buner.</u>			
42.	Zakira D/O Masih Gul. Sonipram.	GGPS Gerani.	"
43.	Malkiat D/O Lal Bad Shah. Bajkata.	GGPS Gerani.	"
44.	Rabiat D/O Ahmad Shah. Rega.	GGPS Kineargalbi.	"

(Contd: on page-2)

FF-64 Buner.

- | | | | |
|-----|--|------|----------------------|
| 45. | Fatirani Begum D/O S. M. Rehman, Nagrai. | CCPS | Chalandarai, Vicant. |
| 46. | Nasim Bibi, D/O Sher Ali Khan, Nawagai. | CCPS | Kingargalai. |
| 47. | Mubarak Jan D/O S. Farid Shah, Nawagai. | CCPS | Leganai. |
| 48. | Mah-e-Talat D/O S. Harif Shah, Nawagai. | CCPS | Charai. |
| 49. | Sumira Bibi D/O Mohd. F. Sooli, Kulyari. | CCPS | Charai. |
| 50. | Rashid Begum D/O Hamid Khan, Manwar. | CCPS | Kot. |
| 51. | Bukht Nand D/O Yaqoob Shah, Bajkata. | CCPS | Kot. |
| 52. | Khilid D/O Faiz Kusan, Kalpani. | CCPS | Jowar. |
| 53. | Bakht Nand Zari D/O Mirap Khan, Bajkata. | CCPS | Chalandarai. |
| 54. | Chand Bibi D/O Miraj Khan, Bajkata. | CCPS | Shanara. |
| 55. | Saliya Bibi D/O Fozal Karim, Kalpani. | CCPS | Shanara. |

TERMS AND CONDITIONS.

- The appointment made purely on temporary basis and subject to the termination at any time without assigning any reason. In case of resignation they shall have to submit one month's prior notice to the Deptt; or forfeit one month's pay in lieu thereof to the Govt.
- The Head of Institution/office required to check their original certificate before handing over charge to the candidate concerned.
- They are required to produce Health & age certificate from the Medical Superintendent concerned before taking over charge.
- No TA/DA is allowed.
- They should not be allowed to take over charge if their age is below 18-years or above (25+3+2=30) years.
- If the candidate fail to take over charge of their post within 14-days of issue of this order their appointment shall stand automatically cancelled.
- Keeping in view ban or appointment in the Deptt relaxation of two years has been allowed in upper ceiling to the applicant for various posts from the date of issue of the Not: No. 303-T (SAGAD) 8/4 dated 10-1-94.

Q. Rasheed

(IST QUADRA RASHID GUL)
DISTT: EDUCATION OFFICER (F)
PRIMARY BUREAU AT SHANARA

Endst: No. 212-1326 / P.No. / T/ Apptt: Dated 13.12.94.

- Copy forwarded for information and necessary action to:
- The Additional Director- Primary Education DFFF Peshawar.
 - The P./ to Director of primary education DFFF Peshawar.
 - The Distt: Accounts Officer, Buner at Dargar.
 - The Sub-Divisional Education Officer (F) Primary Dargar.
 - The Head Distresses concerned.
 - The candidates concerned.

J. W. Shah

Q. Rasheed

DISTT: EDUCATION OFFICER (F)
PRIMARY BUREAU AT SHANARA

Attest
ATTESTED

14

(For use in Police Department only).

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. dated received back

Passed P.T.E. Exam: from RDE in Session 1999 Under R.No. 4697 Secured 892/1200 MARKS RD. 25/4/2000

Passed SSC Exam: from BISE Saidul Sharif, Swat Under R.No. 2371 in Session 1994(A) obtained 363 MARKS

[Signature]
Sub-Divisional Education Officer
Swat District Board

Qualification	Date	Qualifications	Date
English	<i>[Signature]</i> Sub-Divisional Edn. Officer Swat District Board	First Acts	
Pashtu		B. L. or B. A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing			
Court duties			
Reserve duties			

N. B.—Line to be drawn under the qualification possessed.

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name **SHAHNAZ BEGUM** (15)
2. Race **AFGHAN**
3. Residence **Village Rega P.O. & Tehsil Daggan District Buner**

4. Father's name and residence **NADAR KHAN** **As above**

5. Date of birth by Christian era as nearly as can be ascertained **(2-6-1972) / Second June NH. 4 Seventy two**

6. Exact height by measurement **5-2**

7. Personal marks for identification **NIL**
NIC No. 115-69-066191

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger. ✓

Ring Finger.

Middle Finger.

Fore Finger

Thumb

9. Signature of Government servant. **Shahnaz**

Signature and designation of the Head of the Office, or other Attesting Officer.

Sub. P. **[Signature]**
d/L

[Signature]

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. II.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
PTC. untrained CGPS Rega		BPS-7 =	1480/-	Fixed			
	Sub/Per.		1480/-			18 ¹² / ₉₄	Shah/uz
do	do		1480/-			1 ¹² / ₉₅	\$
do	do		1480/-			1 ¹² / ₉₆	\$
do	do		1480/-			1 ¹² / ₉₇	\$
do	do		1480/-			1 ¹² / ₉₈	Bur
do	do		1480/-			1 ¹² / ₉₈	Bur
PTC. Trained CGPS Rega		1480-81-2695	1480/-			25 ¹² / ₂₀₀₀	Bur
do	do		1561/-			1 ¹² / ₂₀₀₀	Bur
do	do		1642/-			1 ¹² / ₂₀₀₀	Bur
BPS-7 ¹² B-2220-120-5820			2460/-			1 ¹² / ₂₀₀₁	Bur
do	do		2580/-			1 ¹² / ₂₀₀₂	Bur
do	do		2700/-			1 ¹² / ₂₀₀₃	Bur
do	do		2820/-			1 ¹² / ₂₀₀₄	Bur
do	do	B-2555-146-6755					
do	do		3255/-			1 ¹² / ₂₀₀₅	Bur

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and name of the officer or attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer			Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant.
				Period	Government to which debitable		
<i>[Signature]</i>	30/11/95	Fixed	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Appointed as P.T.C. Untrained teacher vide DEO (F) P.Y. Edu: Buner order No 1212-132C/F.No.1/Appointment dated 13-12-94.
<i>[Signature]</i>	30/11/96	Fixed	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner				
<i>[Signature]</i>	30/11/97	Fixed	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 18-12-94 to 30-11-96 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/98	Fixed	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-96 to 30-11-97 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/99	Fixed	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-96 to 30-11-97 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	24/4/2000	Passed P.T.C.	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-97 to 30-11-98 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/2000	A/Pnc	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-97 to 30-11-98 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/2001	A/Pnc	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-98 to 30-11-99 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/2001	A/Pnc	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-98 to 30-11-99 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/2002	A/Pnc	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-98 to 30-11-99 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/2003	A/Pnc	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Service Verified w.e.f. 1-12-98 to 30-11-99 from the Acq: Roll and other record of this office.
<i>[Signature]</i>	30/11/04	A/2	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	Awarded Graded pay scale vide DEO (F) P.Y. Buner order No. / dt
<i>[Signature]</i>	36/05/05	Scale Reset	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	
<i>[Signature]</i>	30/11/05	A/Pnc	<i>[Signature]</i> S.D.O. (F) Daggar Distt Buner			<i>[Signature]</i> Sub Divisional Edu Officer (F) Daggar Distt Buner	

Attested
[Signature]

1	2	3	4	5	6*	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
GAPS Rega	Sub/perm	BMS-7-2555-140-6755	3395/-			1-12-05	B
-do-	-do-		3035/-			1-12-06	B
<p>Office of the Assistant General N.W.F.P. Peshawar Pay fixed in the revised basic pay scales of Rs. 2555-140-6755 with effect from 1-12-2005 The Financial Officer, Peshawar</p>							
<p>Scale Revised BMS-7-2940-160-7740</p>							
3257		OFFICE OF THE ASSISTANT GENERAL N.W.F.P. PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES OF OF RS. 2555-140-6755 AT RS. 3255/- WITH EFFECT FROM 1-6-2006 WITH NEXT INCREMENT ON 1-12-2006	4060/-			1-7-07	B
		Account Officer Pay Fixation Party N.W.F.P. Peshawar					
		Service Verified w.e.f. 1-12-2006 to 30-11-2007 from acq: Roll & other Record of this office.					1-7-05
		By: District Officer Edu (F) Dist: Buner					By: District Officer Edu (F) Dist: Buner

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of pay upto four months for which leave salary is debitabale to another Government		
Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8		Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or award or praise of the Government Servant.		
30/11/06		A/m	30/11/06			Service verified w.e.f 1-12-99 to 30-11-2000	
30/11/07		Scale Revised	30/11/07			Service verified w.e.f 1-12-2000 to 30-11-01 from acq. Roll & other Record of this office	
Pay Fixation in BPS Pay in Existing BPS No 7 on 30-11-01 = Rs 3535/- Pay Fixed in BBPS No 7 on 17-12-01 = Rs 4000/- Deputy District Officer (F) Primary Buner at Daggar						Service verified w.e.f 1-12-01 to 30-11-02 from acq. Roll & other Record of this office.	
30/11/07		A/m	30/11/07			Service verified w.e.f 1-12-02 to 30-11-03 from acq. Roll & other Record of this office.	
Detail Of Pay & Allowances On 1-7-06 0001- Basic Pay... 3395 1000- HRA... 766 1300- Medical Allowance... 425 1505- Charge Allowance... 40 1516- Dress/Uniform... 1528- JAA... 75 1548- Washing Allow... 1770- Sp: ad: Allow; 370 1820- Sp: Relief 2095 423 1821- Sp: Rel: 2095 423 1864 Dearness Allow; 509						Service verified w.e.f 1-12-03 to 30-11-04 from acq. Roll & other Record of this office.	
By: District Officer Edu (F) Distt: Buner By: District Officer Edu (F) Distt: Buner						Service verified w.e.f 1-12-04 to 30-6-05 from acq. Roll & other Record of this office	
By: District Officer Edu (F) Distt: Buner						Service verified w.e.f 1-12-05 to 30-11-05 from acq. Roll & other Record of this office	

pay fixation is Revised B-7 w.e.f 1-7-05
 B-7: 2555/-
 pay for Existing pay is B-7 on 30-6-05 B 2820/-
 pay fixed is Revised in Revs on 1-7-05 3255/-

30/11/06
 30/11/07

30/11/07

By: District Officer
 Edu (F) Distt: Buner

By: District Officer
 Edu (F) Distt: Buner

By: District Office
 Edu (F) Distt: Buner

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
		BDS-9	2940	160	7740		
CGPS Rega.	Sub/Per		4220/-			12/07	Bu
	S/Revised	BPS-7	3830	140	4230	7/08	Bu
- D2 -	- D2 -		5050/-				Bu
			5240/-			12/08	Bu
<p>Revised pay structure on legal basis (K.C.)</p> <p>at 30.3.2009 without any pay band 30.3.2009</p>							
B-7 R. 1480			B 1480/-			12/1984	Bu
			B 1511/-			12/85	Bu
			B 1642/-			12/86	Bu
			B 1723/-			12/87	Bu
			B 1804/-			12/88	Bu
			B 1885/-			12/89	Bu
			B 1966/-			12/90	Bu
			B 2047/-			12/91	Bu
B-7 R. 2220-120-5820			B 3060/-			12/92	Bu
			B 3180/-			12/93	Bu

ATTESTED

9	10	11	12	13		14	15
nature and nature of the office or in attestation (paras 1 to 8)	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
Case 30-6-08 Full (F/P) Buner	30-6-08	Scale Revised	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			Pay Fixation in BPS 7 Pay in Existing BPS No 7 on 30-6-08	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-08	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			Pay Fixed in RBPS No 7 on 1-7-08	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-09	<i>Pay Revision</i>	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			Deputy District Officer (F) Primary Buner at Daggur	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-09	<i>Pay Revision</i>	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			service Verified w.o.f. 1.12.09 30-11-2008 from acq. Roll & other Record of this office.	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-95	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			Deputy District Officer (F) Primary Buner at Daggur	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-96	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			Allowed Annual Increment for period of 12 months period in ledger of P.D. (P.R.) 5-2-2002 at 30.3.2002 without arrears prior 30.3.2002	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-97	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur				
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-98	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			BY: DISTRICT OFFICER, (Female) Prg: Education Buner.	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-99	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			understand.	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-2000	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			I hereby undertake to the effect that if any irregularity occurs to me as a result of incorrect fixation, it shall be recovered from my pay.	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-2001	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			Person Benson	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-2002	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur			BY: DISTRICT OFFICER, (Female) Prg: Education Buner.	
<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur	30-11-03	A/M	<i>M. H. B.</i> Deputy District Officer (F) Primary Buner at Daggur				

[Handwritten signature]

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
			13300/-			1 ¹² / ₀₃	SR
			13420/-			1 ¹² / ₀₄	SR
<u>B-7 (2535-140-675)</u>			13550/-			1 ¹² / ₀₅	SR
			14095/-			1 ¹² / ₀₅	SR
<u>B-7 (2840-160-7740)</u>			14235/-			1 ¹² / ₀₆	SR
			14860/-			1 ¹² / ₀₇	SR
<u>B-12 (3630-260-11430)</u>			15020/-			1 ¹² / ₀₇	SR
			15190/-			2 ¹² / ₀₇	SR
<u>B-12 (4385-310-13655)</u>			16215/-			1 ¹² / ₀₈	SR
			16525/-			1 ¹² / ₀₈	SR
			6835/-			1 ¹² / ₀₉	SR
			7145/-			1 ¹² / ₁₀	
		Scale Revised BPS-12-7020-500-22000)	11500/-			1 ⁷ / ₁₁	
			12500/-			1 ¹² / ₁₁	

ANNEXURE
13/11/11

9-	10	11	12	13.		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the officer or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or award or praise of the Government Servant.
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/09	None	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/6/05	Pay Revision	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/05	None	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/06	None	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/6/07	Pay Revision	DD - hsb Deputy District Officer (F) Primary Buner at Daggur	12/4/11/10			Appears of pay & allowances w.e.f. 1/9 to 30/9/2010 due to trained/interim period. Paid Rs. 28776/2
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/07	B-12 Opted 2/12/07	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/6/08	Pay Revision	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/08	None	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/09	A/gmc	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/10	A/gmc	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/6/11	Pay Revision	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur	30/11/11	A/gmc	DD - hsb Deputy District Officer (F) Primary Buner at Daggur				
DD - hsb Deputy District Officer (F) Primary Buner at Daggur							

OPTION.

As a result of up-gradation of P.P.S. 1110 m.e.f. 1/10/07 vide Finance Deptt; No. FD/50 (FR) 10-22 (S) IV (A) Dated 26/1/08 opt for Re-Fixation of pay on 2/12/07 as per Rules vide Govt. of NWFP Finance Deptt; No. FD (PR) 1-1 (86) VI (A) Dated; 5/6/1986.

Signature of Govt. Servant

DD - hsb
Deputy District Officer (F)
Primary Buner

Service Verified w.e.f. 15/12/2008 to 30/11/2011 from acq. Exp & other Record of this office

By: District Officer (FEMALE) PRY: EDUCATION BUNER

Sanction of GPR (A) vide EDR (E+S) Buner. Ends 7 2012.119-20 dated 20/8/12 Anding to Rs. 100000/-

DD - hsb
Deputy District Officer (F)
Primary Buner

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
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[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
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[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]
[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]	[Faint text]

T/103 dated 1-10-012
 vide GPF Section
 No 1218-20 dated 20-9-012
 Advance PS = 100000/-
 DA 1/2%
 15/10

[Signature]
 ATTENDED
 [Signature]

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

(25)

Annex C

NOTIFICATION

Peshawar, dated the November 13, 2012.

No. SO/PE/1-SSSPC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

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

Encl. No. & Date as above.

Copy forwarded to:-

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

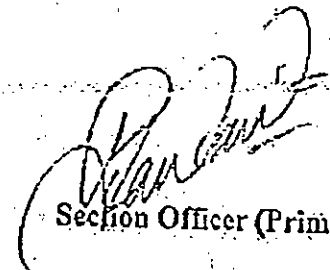
ATTESTED

SECRETARY

(19)
Annex C
B


26

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


Section Officer (Primary)

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APPENDIX

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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).	(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 (ii) M.A. in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (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; (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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			<p>(iv) one per cent from amongst Instructional Material Specialists with atleast five years service such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)		(b) fifty per cent by initial recruitment.
3.	Senior Theology Teacher (STT) (B-16)		By promotion, on the basis of seniority-cum fitness, from amongst Arabic Teachers, with least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
4.	Senior Certified Teacher (SCT)(General) (BPS-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.
			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).

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	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 Teacher (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.

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	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 Tanzimatul Wafaqui 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 (TI) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqui 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

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	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 Primary School Head Teachers 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 Primary School Head Teachers for transfer, 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 year service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p><u>Note:</u> 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>	<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</p>

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		<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>Note: 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>

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	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 o</p>

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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 Training center of the level of certified Teacher Agro Technical (Home Economics).		Certified Teacher (Home Econ.) Note: In case of non availability of suitable person for promotion, then by initial recruitment.
17.	Drawing Master (BPS-15).	Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.	18 to 35 years.	(a) Eighty per cent by initial recruitment; and (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. 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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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; or</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).			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.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers.

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				with at least five years service as such : having qualification prescribed for ini 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 Coun level: provided that if no suitable candidate within the Union Council is available, then fr the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hiz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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SCHEDULE

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

Arabic Teacher

Educational Qualification	Total Marks: 100
SSC	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
B.A/B.Sc	Marks obtained X 20 / total marks = _____
MA Arabic / Shahadatul Alamiya Fil Uloomul Arabia wal Islamiya from a recognized Tanzeemuul Wafaqul Madaris	Marks obtained X 20 / total marks = _____
Other MA/M.Sc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____
M.Phil/PhD	Marks = 05

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = _____
HSSC	Marks obtained X 20 / total marks = _____
B.A/B.Sc	Marks obtained X 20 / total marks = _____
MA/M.Sc/M.Ed / MA Edu	Marks obtained X 20 / total marks = _____
MA Islamiyat / Shahadatul Alamiya Fil Uloomul Arabia wal Islamiya from a recognized Tanzeemuul Wafaqul Madaris	Marks obtained X 15 / total marks = _____
M.Phil/PhD	Marks = 05

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Qual/Qualia

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks =
Qirt 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 20 / 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 / ADE	Marks obtained X 20 / total marks =	
MA/MSc/M.Ed/MA Edu	Marks obtained X 15 / total marks =	
MPhil/PhD	Marks = 05	

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Drawing Master

Category of Qualification	Total Marks 100	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 = _____	
DM Certificate	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

Physical Education Teacher

Category of Qualification	Total Marks 100	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 = _____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities group at Intermediate 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.
IISSC	Marks obtained X 10 / total marks = _____	
B.A/B.Sc	Marks obtained X 25 / total marks = _____	
FST Certificate/ Diploma in Education / ADE	Marks obtained X 20 / total marks = _____	
MA/M.Sc/M.Ed / MA Edu	Marks obtained X 20 / total marks = _____	
M.Phil/PhD	Marks = 05	

Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and they will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.
2. 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 merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/ forged/ bogus upon scrutiny of verification, the service of the teacher concerned shall be terminated and the amount paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery/fraud under the relevant law.
4. Dent Asnod from recognized Tazccmat-ul-Wafaqul Madaris, 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 will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be.

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To

Secretary
The Director Of Education (S
Peshawar, KPK

r the respondents.....

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Amir C

Amir D

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Departmental APPEAL AGAINST THE ORDER/
NOTIFICATION DATED 13.11.2012

Respectfully Sheweth:

- 1) That education department advertised posts of (PTC) Primary School Teachers and described the qualification as metric PTC certificate.
- 2) That appellants competed for the same and were selected and appointed as PTC/PST (Primary School Teachers) in BPS 7.
- 3) That appellants are serving as teachers (primary school teacher) for the last more than 25 years.
- 4) That appellants served in the said grade for the last more than 25 years and all are serving as Head Teachers.
- 5) That throughout the Province/ Pakistan, rules/ notification was issued for upgradation of those employees who served for 10 years in one grade.
- 6) That vide notification dated 13th November, 2012 respondent held in Column No.19 as under -

"By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least then years service and having qualification prescribed for initial recruitment for Primary School Teacher."

In column No.20 of notification held as under:

"By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least then years service and having qualification prescribed for initial recruitment for Primary School Teacher."

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Column No.21 is reproduced as under:-

- 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."*

7) That education department are interpreting column No.19 of said rules by depriving petitioners of Primary School Head Teacher (BPS-15) on the ground that petitioners are lacking F.A, whereas petitioners are continuously performing the duties of Head Teacher for more than 10 years.

That appellants being aggrieved approach your good-self on following grounds.

GROUND:

- A) Because appellants are qualified for the post of Primary School Teacher as possessing Metric with PTC which is the requisite qualification for the post in question.
- B) Because appellants are qualified for the post, that is why, appellants are holding the posts.
- C) Because appellants are holding and occupying the post of Primary School Head Teacher for more than 10 years, therefore, vested right has accrued to appellants and appellants can't be divested of the same.
- D) Because the instant notification dated 13th November, 2012 is to be given effect immediately and it has no retrospective effect. Thus already vested qualification of metric & PTC can't be divested for appellants.

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- E) Because as per principles of Interpretation of statute, retrospective effect is not to be given to a statute unless it is specifically provided in clear words.

- F) Because as per column No.20, Senior Primary School Teacher (BPS-14) is by promotion on the basis of Seniority-cum-Fitness from amongst the Primary School Teachers, and column 19 of the notification prescribes that (PSHT) BPS-15 is by promotion on the basis of seniority-cum-fitness from amongst Senior Primary School Teacher (BPS-14) with at least 10 years service, and having qualification prescribed for initial recruitment of Primary School Teacher (BSP-12). The last condition needs harmonious interpretation of column No.21 (II) i.e. S.S.C or the initial recruitment qualification at the time of appointment of petitioners or the initial recruitment qualification of Primary School Teacher (BSP-12) needs to be deleted or declared ultra-vires as petitioners crossed Primary School Teacher (BPS-12), Senior Primary School Teacher (BPS-14) are practically working as Head of the Primary School i.e. Primary School Head Teacher (PSHT) BPS-15, thus the qualification of BPS-12 can't be trusted upon them or in other words when promotion is amongst Senior Primary School Teacher (BPS-14) then report to initial recruitment of Primary School Teacher (BPS-12) is not to be made or this reference means qualification which existed at the time of initial recruitment of petitioners i.e. 25/30 years back.

- G) Because as per General Clause Act/ Principles of interpretation of statute, these rules ought to be beneficially interpreted in favor of appellants.

- H) Because if education department succeeded in interpreting the rules with respect to initial qualification in present rules, the young/ junior most F.A qualified Teachers are to be promoted as against appellants holding S.S.C + PTC qualification and senior most, equal to the age of Fathers of said F.A qualified Teachers, then appellants shall be made subordinate to his subordinate (F.A qualified) which

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is against all canons of justice, service laws, S- 8 (seniority), S-9 (promotion) of Civil Servant Act, 1973 and would be ultra-vires.

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- 1) Because as per General Clause Act, notice is must to the effectees if rules are changed to their disadvantage (Relevant Section 23 of General Clause Act is Annexure "H" and Repeal Chapter of Interpretation of Statute is Annexure "I")

It is, therefore, humbly prayed that on acceptance of this appeal, an appropriate order may please be issued to by putting harmonious interpretation upon column NO.16,19,20 of the notification dated 13th November, 2012 read with qualification prescribed for initial recruitment at the time of entry into service and not the qualification of initial recruitment mentioned in column No.16 of notification dated 13th November, 2012 as it would amount to give retrospective effect to the notification dated 13th November, 2012 with respect to qualification of initial recruitment.

Any other relief deemed fit may also be graciously granted.

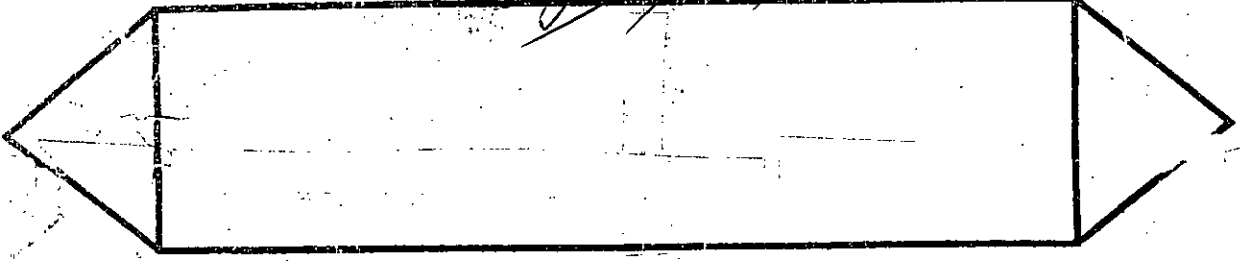
Date: 23.11.2012

- ① Zor Bakht Shah
- ② Gul Ahmad
- ③ Mst. Soriat
- ④ Bakht Afsar
- ⑤ Hidayat-ur-Rehman
- ⑥ Malak Zada
- ⑦ Mst. Gul Hawa Bibi
- ⑧ Mst. Shahnaz Bibi
- ⑨ Shams-ur-Hadi
- ⑩ Amjad Ali

- ⑪ Said Malik
- ⑫ Mst. Mihaqat Bibi
- ⑬ Mst. Yasmeen Begum
- ⑭ Wahid Rasool
- ⑮ Tehsinullah
- ⑯ Shah Roz Khan
- ⑰ Misar Ahmad
- ⑱ Ram Kishan
- ⑲ Jeet Kumar

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بعدالت سرسوں کی سرپرستی کے



31/2/2013ء منجانب

سجاد شہنازی (پہنام گورنمنٹ ہائی اسکول)

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام کیلئے صاحبہ کی طرف سے پیروی و جواب دہی کی طرف سے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوفہ کے مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو ترچہ و ہرجانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Shamla

8 مارچ 2013ء

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المرقوم

واہ

کے لئے منظور ہے۔

بمقام
Shamla
Shamla