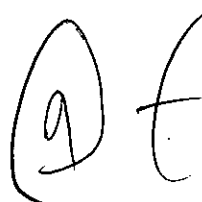



24.11.2016

Counsel for the appellant and Assistant AG for respondents present. Learned counsel for the appellant submitted before the court that the appellant has been given promotion to g rade-16 hence, the instant appeal has become infructuous and the same may be dismissed as withdrawn.

In light of above submissions the appeal in hand is hereby dismissed as withdrawn. No order as to costs. File be consigned to the record room.

ANNOUNCED:
24.11.2016


(ABDUL LATIF)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

24.11.2015


Appellant in person, Mr. Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for official respondents No. 1 to 4 and private respondent No. 5 in person present. Written reply by private respondent No. 5 submitted. Cost of Rs. 500/- also paid and receipt thereof obtained. The appeal is assigned to D.B for rejoinder and final hearing for 11.4.2016.


Chairman

11.04.2016

Appellant with counsel, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Mr. Ziaullah, GP for official respondents No. 1 to 4 and counsel for private respondent No. 5 in person present. Learned counsel for the appellant stated that he does not want to submit rejoinder. To come up for arguments on 5-8-16



Member


Member

05.08.2016

Counsel for the appellant (Mr. Said Bashir, Advocate), Mr. Muhammad Jan, GP for official respondents and private respondent No.5 in person present. Counsel for the appellant requested for adjournment. To come up for arguments on 24.11.2016.


Member


Member



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA

0923-9220228 ~ 0923-9220228 emisnowshehra@yahoo.com

POSTING ORDER

In pursuance of the Notification issued by the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No. 6521-27/File No.2/Promotion SST B-16 date Peshawar the 15.08.2016, the following newly promoted SST (General) and SST (Phy-Maths) BPS-16 (Rs. 15880-1280-54280), are hereby posted in the schools noted against each, on the terms and conditions given below in the interest of public with immediate effect.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remarks
A. SST (General)					
1. Promotion of Sr. CT / CT to SST (General) BPS-16					
01	86	Qazi Habib ul Haq SCT	GHS No.2 Nowshera Cantt:	GHS No.1 NSR Cantt:	A.V.P.
02	90	Inayat ur Rahman SCT	GHS Baghban Pura	GHS Baghban Pura	Against newly created post
03	91	Qasim ud Din SCT	GHSS Ziarat Kaka Sahib	GHSS Ziarat Kaka Sahib	*A.V.P.
04	92	Syed Saadat Ali Shah SCT	GHS Mohib Banda	GMS Banda Malahan	Against newly created post
05	95	Saleh Abbas SCT	Govt. Shaheed Waseem Iqbal High School Tarkha	Govt. Shaheed Waseem Iqbal High School Tarkha	---do---
06	100	Noor ul Bashir SCT	GHS Zakhi Qabristan	GHS Zakhi Qabristan	A.V.P.
07	101	Nasir Khan SCT	GHSS Nowshera Kalan	GHSS Nowshera Kalan	Against newly created post
08	105	Khurshid SCT	GHS No.2 Nowshera Cantt:	GHS No.1 Nowshera Cantt:	---do---
09	106	Hukmat Khan SCT	Govt. Shaheed Mujahid Hussain Shah High School Taru Jabba	Govt. Shaheed Mujahid Hussain Shah High School Taru Jabba	---do---
10	107	Muhammad Hayat SCT	GHSS Akbar Pura	GHSS Akbar Pura	---do---
11	108	Laiq Bahadar SCT	GHS No.2 Shaidu	GHS No 2 Shaidu	A.V.P.
12	109	Muhammad Khalid SCT	GHS No.1 Nowshera Cantt:	GHS No.1 Nowshera Cantt:	A.V.P.
13	113	Raza Muhammad SCT	GHSS Jallozai	GHSS Jallozai	A.V.P.
14	114	Sartaj Ali SCT	GHS Pabbi	GHS Wazir Garhi	A.V.P.
15	116	Shafi Ullah SCT	GHS Kotli Saleh Khana	GHS Kotli Saleh Khana	A.V.P.
16	122	Khawaja Muhammad SCT	GHS Dagi Banda	GHS Dagi Banda	A.V.P.
17	124	Muhammad Arif SCT	GHSS Khairabad	GHSS Khairabad	Against newly created post
18	126	Shams ul Haq SCT	GHS No.1 Shaidu	GHS Jehangira Road	A.V.P.
19	127	Fazal Ghaffar SCT	GHS Behram Killi	GHSS Risalpur	Against newly created post
20	128	Muhammad Suleman SCT	GHS Badrashi	GHS Badrashi	---do---
21	132	Yahya Jan SCT	GHSS Khesghi Payan	GHSS Khesghi Payan	---do---
22	133	Zar Ali Khan SCT	GHS Dagi Banda	GHS Dagi Banda	Vise S#01
23	135	Aman Ullah SCT	GHS Kotar Pan	GHS Kotar Pan	Against newly created post
24	139	Majced ur Rahman SCT	GHS Pabbi	Govt. Shaheed Waseem Iqbal High School Tarkha	A.V.P.

S#	S.L. #	Name & Designation	Present School	Place of Posting	Remark
25	140	Zar Ali Shah SCT	GHS Azakhel Payan	GHS Aman Garh	A.V.P.
2. Promotion of Sr. DM / DM to SST (General) BPS-16					
01	18	Muhammad Bashir SDM	GHS Aman Garh	GHS Pir Sabag	A.V.P.
02	19	Abdul Jalil SDM	GHS No.1 Shaidu	GHS No.1 Shaidu	Against newly created post
03	21	Muhammad Ajmal Mumtaz SDM	GCMHS Akora Khatak	GHS Watar	A.V.P.
3. Promotion of Sr. AT / AT to SST (General) BPS-16					
01	04	Muhammad Ishaq ul Hassan SAT	GCMHS Akora Khatak	GHS AC Centre	A.V.P.
02	12	Haji Akbar SAT	GHS Nawar Killi	GHS Hara Banda	A.V.P.
03	15	Syed Moatar Shah SAT	GHS Mohib Banda	GHS Pashoon Garhi	A.V.P.
4. Promotion of Sr. TT / TT to SST (General) BPS-16					
01	12	Asal Khan STT	GHS Kotar Pan	GHS Kotar Pan	A.V.P.
02	18	Abdur Rahman STT	GHS Kheshti Payan	GHS Nowshera	Vice SHO2
03	21	Sajid Anwar STT	GHS Akbar Pura	Govt. Shated Mujahid Hussain Shah High School Taru Jabba	A.V.P.
5. Promotion of Sr. Qari / Qari to SST (General) BPS-16					
01	02	Fazil Wahab Sr. Qari	GHS Marhati Banda	GHS Marhati Banda	Against newly created post
02	13	Lal Mir Sr. Qari	GHS Azakhel Payan	GHS No.2 Pir Pal	A.V.P.
6. Promotion of RSHT to SST (General) BPS-16					
01	131	Noor Zaman PSHT	GPS Zao Banda	Govt. Shated Sher Shah Higher Secondary School Dak Ismail Khel	A.V.P.
02	259	Subidar Shah PSHT	GPS No.1 Mian Issa	GHS Pir Sabag	A.V.P.
03	305	Hukam Said PSHT	GPS Tarkhel Bala	GHS Manahi	A.V.P.
04	320	Amir Zada PSHT	GPS Ali Garh	GHS Adamzai	A.V.P.
05	347	Muhammad Tariq PSHT	GPS No.2 Jabba Tar	Govt. Shated Mujahid Hussain Shah High School Taru Jabba	A.V.P.
06	349	Ikram Ullah PSHT	GPS No.1 Jarooaba	Govt. Shated Ali Abbas High School Dag Behsud	A.V.P.
07	379	Samar Gul PSHT	GPS Iraq Abad	GHS Pir Pal	A.V.P.
08	381	Tariq Mustafa PSHT	GPS No.3 Jallozai	GHS Spn Khak	A.V.P.
09	390	Javed Khan PSHT	GPS Umar Abad	GMS Gul Bahar Shaidu	
10	412	Waqar Ahmad PSHT	GPS No.3 Spn Kani Kalan	GHS Wazir Garhi	A.V.P.
11	420	Sartaj Ali PSHT	GPS Dhert Mian Ishaq	GHS Kandi Taza Din	A.V.P.
B. SST (Phy-Maths)					
1. Promotion of PST / Sr. PST / PSHT to SST (Phy-Maths) BPS-16					
01	1241	Rahat Sher	GPS Bahadar Khan Korona	GHS Kheshti Bala	A.V.P.
C. Consequent Transfer					
01		Ali Akbar SST(G)	GHS Dagi Banda	Govt. Shated Mujahid Hussain Shah High School Taru Jabba	Vice SH23
		Muhammad Hameed	GHS Nowshera Kalan	GHS Kheshti Payan	Vice SH02

Promotion of SCT/CT/SDM/DM/SAT/AT/SST/TT/Sr.Qari/Qari/PST/SPST/PSHT to SST (BPS-16)



Promotion of SCT/CT/SDM/DM/SAT/AT/STT/TT/Sr.Qari/Qari/PST/SPST/PSHT to SST (BPS-16)

Terms & Conditions:

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. The Principals / Head Master / Drawing & Disbursing Officers should checked their original documents (Academics + Professional) before handing over charge.
5. The Principals / Head Masters / Drawing & Disbursing Officers are required to submit their necessary documents for verification to District Education Officer (Male), Nowshera along with original payee receipt.
6. The Principals / Head Masters / Drawing & Disbursing Officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the Universities concerned. During the verification process, if any Degree / Certificate is found fake / Bogus, their promotion shall stand cancelled.
7. The District Education Officer (Male), Nowshera will issue Clearness Certificate after the verification process.
8. Charge Report should be submitted to all concerned.
9. Their Inter-Se-Seniority on lower post will remain intact.
10. No TA / DA is allowed for joining their new post.
11. They will give an undertaking to be recorded in their Service Bookst/File to the effect that if any overpayment is made to them in light of this order will be recovered and if anyone is wrongly promoted he shall be reversed.

(Fayaz Hussain)
District Education Office (Male)
Nowshera

Endst: No. 5430-82/DEO(M)NSR/EA-S/Prom: of SSTs. Dated Nowshera the, 20 / 08 / 2016.
Copy of the above is forwarded for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar w/r to Notification No. quoted above.
2. District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Nowshera.
4. District Monitoring Officer (DMO) Nowshera.
5. Sub Divisional Education Officer (Male), Nowshera.
6. Assistant District Education Officer - Establishment (Primary & Secondary), Local office.
7. Superintendent - Establishment (Primary & Secondary), Local office.
8. Dealing Assistant - Establishment (Primary & Secondary), Local office.
9. Assistant Programmer D-EMIS, local office.
10. Accountant, Local office.
11. Officers concerned.
12. Master File.

District Education Officers (Male)
Nowshera



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938.

9210437, 9210957, 9210468

Fax 091-9210936, 0800-3385-

E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted by the District Education Officer concerned.

A. SST (Phy-Maths)

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

Total No. of posts of SST (Phy-Maths)	05
25% share initial recruitment	01
75% share for Promotion.	04
20 % Share of promotion of PSHT/SPST/PST	01
Posts available for promotion	01
Promoted through this order	01

S. No	S.L. No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular PST	Qualification	Remarks
1	124	Rahat Sher	GPS, Bahadar Khan Koroona	2/6/1972	2/11/1995	MA B.Ed	Services placed at the disposal of DEO M. Nowshehra for further posting against SST (Phy-Maths) post.

B. SST (General)

2. PROMOTION OF Senior CT/CT TO SST (General) BPS-16.

Total No. of SST vacant post of SSTs(General)	67
25% share initial recruitment	17
75% share for Promotion.	50
40 % Share of promotion of Sr; CT/CT	26
Posts available for promotion	26
Promoted through this order	25

S. No	S.L. No	Name Of Official	Present Place Of Posting	Date Of Birth	Date Of Appott: As Regular CT	Qualifi-Cation	Remarks
1	86	Q.Habib Ul Haq	GHS.No.2 Nowshehra Cantt	1/4/1970	2/4/1992	MA/Edu	Services placed at the disposal of DEO M. Nowshehra for further posting against SST (General) post.
2	90	Inayat Ur Rehman	GHS Baghban pura	6/11/1964	22/11/1992	MA//B.E D	-----do-----
3	91	Qasimud Din	GHSS, Z.K.Sahib	4/4/1966	22/11/1992	MA/B.ED	-----do-----
4	92	S.Saddat Ali Shah	GHS Mohib Banda	6/2/1968	8/3/1993	BA B.ED	-----do-----
5	95	Saleh Abbas	GHS. Takha	20.2/1966	7/4/1993	BA B.ED	-----do-----

6	100	Noor Ul Bashar	GHS Zakhi Qabristan	5/1/1957	28/4/1993	MA/B.ED	-----do-----
7	101	Nasir Khan	GHS No.1 NSR Kalan	2/5/1967	28/4/1993	BA/B.ED	-----do-----
8	105	Khurshid	GHS No.2 NSR Cantt	17/3/1964	21/10/1993	MA/B.ED	-----do-----
9	106	Hukmat Khar	GHS. Taru	15/7/1965	21/10/1993	MA/B.Ed	-----do-----
10	107	Muham mad Hayat	GHSS, Akbar Pura	3/4/1967	23/10/1993	MA/B.Ed	-----do-----
11	108	Laiq Bahadar	GHS No.2 Shaidu	25/10/1966	24/10/1993	MA/B.ED	-----do-----
12	109	Muham mad Khalid	GHS No.2 NSR Cantt	15/12/1966	24/10/1993	MA/B.ED	-----do-----
13	113	Raza Muham mad	GHSS, Jalozai	25/12/1960	25/12/1993	MA/B.ED	-----do-----
14	114	Sartaj Ali	GHS Pabbi	5/4/1962	25/12/1993	MA/b.ED	-----do-----
15	116	Shafi Ullah	GHS Kotli Saleh Khana	11/4/1968	5/1/1994	MA/B.ED	-----do-----
16	122	Khawaja Muham mad	GHS, Dagi Banda	22/2/1965	29/5/1994	MA/B.Ed	-----do-----
17	124	Muham mad Arif	GHSS, Khair A bad	1/3/1966	29/5/1994	BA/B.Ed	-----do-----
18	126	Shams Ul Haq	GHS No.1 Shaid	20/10/1967	29/5/1994	BA/B.ED	-----do-----
19	127	Fazal Ghaffar	GHS Behram Killi	8/1/1968	29/5/1994	MA/B.ED	-----do-----
20	128	Muham mad Suliman	GHS Badrashi	20/1/1968	29/5/1994	BA, B.ED	-----do-----
21	132	Yahya Jan	GHSS, Kheshgi Payan	1/4/1970	29/5/1994	MA/B.ED	-----do-----
22	133	Zar Ali Khan	GHS, Dagi Banda	17/2/1968	10/7/1994	BA/B.ED	-----do-----
23	135	Aman Ullah	GHS Kotar Pal	18/2/1969	19/11/1994	MA/B.Ed	-----do-----
24	139	Mujeed Ur Rehman	GHS, Pabbi	10/10/1968	21/11/1994	BA/B.Ed	-----do-----
25	140	Zar Ali Shah	GHS, Aza Khel Payan	1/11/1969	21/11/1994	BA/B.Ed	-----do-----

3. PROMOTION OF PSHT/SPST/PST TO SST (Genral)**BPS-16**

Total No. of vacant Posts of SST (General)	67
25% share initial recruitment	17
75% share for Promotion.	50
20 % Share of promotion of PSHT/SPST/PST	13
Posts available for promotion	13
Promoted through this order	11

S. No	S.L. No	Name Of Official	Present Place Of Posting	Date Of Birth	Date Of Apptt: As Regular PST	Qualifi- Cation	Remarks
1	131	Noor Zaman	GPS, Zoo Banda	10/1/1965	4/10/1985	BA, B.Ed	Services placed at the disposal of DEO (M. Nowshehra) for further posting against SST (General) post.

2	259	Subidar Shah	GPS No.1, Mian Esa	12/11/1960	31/12/1987	BA B.Ed	-----do-----
3	305	Hukam Said	GPS, Thur Khel Bala	14/4/1964	31/11/1989	BA B.Ed	-----do-----
4	320	Mir Zada	GPS, Afgrah	3/1/1966	31/11/1989	BA B.Ed	-----do-----
5	347	Muhammad Tariq	GPS No.2, Jabba Tar	12/1/1970	26/8/1989	MA B.Ed	-----do-----
6	349	Ikram Ullah	GPS No.1, Jarooaba	14/4/1966	26/8/1989	MA B.Ed	-----do-----
7	379	Samar Gul	GPS, Iraqabaa	14/3/1965	7/3/1990	BSc B.Ed	-----do-----
8	381	Tariq Mustafa	GPS No.3 Jaloza	26/12/1966	7/3/1990	BA B.Ed	-----do-----
9	390	Javed Khan	GPS, Umar Abad	15/10/1966	8/3/1990	BA B.Ed	-----do-----
10	412	Waqar Ahmad	GPS No.3 Spin Kana Kulan	4/5/1971	14/11/1990	MA B.Ed	-----do-----
11	420	Sartaj Ali	GPS, Dheri Mian Ishaq	14/2/1968	25/11/1990	MA B.Ed	-----do-----

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

Total No. of vacant Post of SSTs (General)	6-
25% share initial recruitment	1-
75% share for Promotion	50
04 % Share of promotion of SDM/DM	03
Posts available for promotion	03
Promoted through this order	03

S. No	S.L No	Name Of Official	Present Place Of Posting	Date Of Birth	Date Of Apptt: As Regular D.M	Qualifi-Cation	Remarks
1	18	Muhamad Bashir	GHS Aman Garh	15/9/1964	9/1/1995	MA/B ED	Services placed at the disposal of DEO (M) Nowshehra for further posting against SST (General) post
2	19	Abdul Jalil	GHS No 1 Shaidu	1/2/1966	9/1/1995	BA/B Ed	-----do-----
3	21	Muhammad Ajmal Mumtaz	GCMHS, Akora Khattak	22/4/1968	9/1/1995	BA/B Ed	-----do-----

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

Total No. of vacant posts of SST General Posts	67
25% share initial recruitment	17
75% share for Promotion.	50
4 % Share of promotion of SAT/AT	03
Posts available for promotion	03
Promoted through this order	03

S. No	S.L No	Name Of Official	Present Place Of Posting	Date Of Birth	Date Of Apptt: As Regular AT	Qualifi-Cation	Remarks
1	4	Muhammad Irshad Ul Hassan	GCMHS, Akora Khattak	1/2/1961	1/10/1985	MA/B.Ed	Services placed at the disposal of DEO (M) Nowshehra for further posting against SST (General) post.
2	12	Haji Akbar	GHS, Nawab Killi	20/4/1969	18/3/1992	MA/B.Ed	-----do-----
3	15	S.Moatar Shah	GHS, Mohib Banda	20/4/1967	23/10/1993	MA B.Ed	-----do-----

6. PROMOTION OF STI/IT TO SST (General) BPS-16.

Total No. of vacant Post of SSTs (General)	6-
25% share initial recruitment	1-
75% share for Promotion	50

03 % Share of promotion of STT/TT	03
Posts available for promotion	03
Promoted through this order	03

S. No	S.L. No	Name Of Official	Present Place Of Posting	Date Of Birth	Date Of Apptt. As Regular TT	Qualifi- Cation	Remarks
1	12	Asai Khan	GHS, Kotar Pan	6/10/1967	17/1/1998	M.A/B.ED	Services placed at the disposal of DEO M Nowshehra for further posting against SST (General) post.
2	18	Abdur Rehman	GHSS, Kheshgi Payan	7/1/1978	8/4/1999	MA/B.Ed	-----do-----
3	21	Sajid Anwar	GHSS, Akbar Pura	1/1/1974	16/12/1999	BA/B.Ed	-----do-----

7. PROMOTION OF S.Qari/Qari TO SST (General) BPS-16.

Total No. of vacant Post of SSTs (General)	67
25% share initial recruitment	17
75% share for Promotion.	50
03 % Share of promotion of Sr; Qari/Qari	02
Posts available for promotion	02
Promoted through this order	02

S. No	S.L. No	Name Of Official	Present Place Of Posting	Date Of Birth	Date Of Apptt. As Regular TT	Qualifi- Cation	Remarks
1	2	Fazli Wahab	GHS, Marhati Banda	20/8/1967	2/11/1986	BA/B.Ed	Services placed at the disposal of DEO M Nowshehra for further posting against SST (General) post.
2	13	Lal Mir	GHS, Azal Payan	1/2/1975	6/5/1996	BA/B.Ed	-----do-----

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education,
Khyber Pakhtunkhwa Nowshehra.

Endst: No. 6521-27 / File No.2/Promotion SST B-16: Dated Nowshehra the 15/08/2016.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Nowshehra.

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

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


17.04.2015

Appellant Deposited
Security & Process Fee



Counsel for the appellant present. Learned counsel for the appellant argued that was senior to one Faiz-ur-Rehman, respondent No.5 and was entitled to promotion from the position of Senior Qari BPS-15 to BPS-16 but the appellant was ignored and respondent No.5 was illegally promoted. That against the impugned order dated 28.10.2014 the appellant preferred departmental appeal date nil forwarded on 26.12.2014 which was not responded within the statutory period and hence the instant service appeal on 24.03.2015.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 14.07.2015 before S.B.


Chairman


14.07.2015

Appellant in person, M/S Khurshid Khan, SO for respondent No. 2, Muhammad Irfan, ADO for respondent No. 3 alongwith Addl: A.G for official respondents and counsel for private respondent No. 5 present. Official respondents submitted written reply while counsel for private respondent No. 5 Wakalat Nama and requested for adjournment. To come up for written reply/comments on behalf of respondent No. 5 on 26.8.2015 before S.B.


Chairman

26.08.2015

Counsel for the appellant, M/S Khurshid Khan, SO, Javed Ahmed, Supdt. and Muhammad Irfan, ADO alongwith Addl: A.G for official respondents No. 1 to 4 and counsel for private respondent No. 5 present. Written reply not submitted by private respondent No. 5. Last opportunity granted subject to payment of Rs. 500/- which shall be paid by private respondent No. 5 from his own pocket. To come up for written reply/comments on behalf of respondent No. 5 and cost on 24.11.2015 before S.B.


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 266/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02.04.2015	<p>The appeal of Mr. Qari Lal Meer resubmitted today by Mr. Said Bashir Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	3-4-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>17-4-15</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

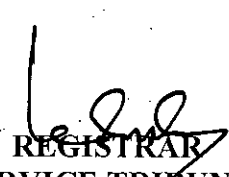
This is an appeal filed by Mr. Lal Meer today on 24/03/2015 against the order dated 28.10.2014 against which he preferred/made a departmental appeal on 26.12.2014 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

Memorandum of appeal may be got signed by the appellant.

No. 387 /ST,

Dt. 25/3 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Said Bashir Adv. Pesh.

Note:- Sir,

90 days have expired and the appellant have signed the memo of appeal.

Resubmitted after removing the objections



1-4-15

Adv. H.C.
at Rawalpora

2
1

Prayer:-

That the orders may please be declared against law, rules, principles of promotion policy and natural justice and ab-initio illegal/void be set-aside and the appellant may please be promoted to BPS-16 from BPS-15 being qualified.

Respectfully Sheweth:-

1. *That the appellant is qualified a Qari, Hafiz-e-Quran, M.A B,Ed and qualified for promotion, working as SS Teacher in the Education Department since 02/05/1996 recruited vide order No 2101-5. (Copy of the order is attached as annexure "A").*
2. *That the appellant was promoted to BPS-15 on 12/04/2013 vide order/notification No 1823-27 in which the name of the appellant is mentioned at serial No 13. (Copy of the order is attached as annexure "B").*
3. *That the respondent No 5 Faiz -ur-Rehman was not promoted to BPS-15 as he was not qualified being not a Qari and Hafiz-e-Quran and the respondent No 5 has not challenged the promotion of appellant to BPS-15 and the order "Annexure "B" has gotten the finality.*

- 201
4. *That interestingly the respondents No 3 & 4 have promoted (Jumped over) respondent No 5 from BPS-12 to BPS-16 and the appellant was ignored without any reason (Copy of the impugned order is attached as annexure "C").*
 5. *That the appellant is entitled to be promoted to BPS-16 being fit and qualified and appearing at Serial No 13 in the list of Senior Qaris BPS-15.*
 6. *That the appellant filed departmental appeal to the departmental authority, but with no response in 90 days and hence the present appeal. (Copy of departmental appeal is attached as annexure "D").*
 7. *Now feeling aggrieved from the impugned notification No 3381-85 dated 28/10/2014 the appellant approaches this Honourable Tribunal on the following grounds inter alia:-*

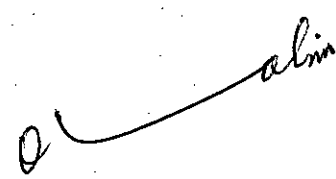
Grounds:-

- A. *That the impugned notification is illegal, against the natural justice and against the promotion policy and not maintainable.*

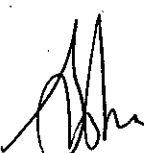
- 4
- B. That the respondent No 5 is not qualified for promotion to BPS-16 in presence of the qualification and seniority of the appellant.
- C. That the appellant was illegally ignored and dropped from the promotion being a qualified teacher and being covering in the promotion quota of Qaries.
- D. That the appellant seeks permission of this Honourable Tribunal to rely on additional grounds at the time of hearing.

It is, therefore, requested that the impugned notification my please be set aside as prayed above and the appellant may be given promotion to BPS-16 from the retrospective effect.

Dated:-21/03/2015

Appellant 
Qari Lal Meer S/o Khan Meer
SS Teacher Govt: High School
Aza Khel

Through:-


Said Bashar,
Advocate, High Court,
At Nowshera.



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

Ann - B

6

NOTIFICATION

Consequent upon the approval of the Departmental Promotion Committee (DPC) and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(B&A)/1-18/E&SE/2012 dated 11-07-2012 and Finance Endorsement No. SO(FR)/FD/10-22(E)/2010 dated 16-07-2012, the following Qari B-12 are hereby promoted to the post of Senior Qari B-15 (Rs.8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each: -

S #	S.L. #	Name of Teacher	Present School	Place of Posting
01	8	Muhammad Bilal	GHS, Shah Kot	GHS, Shah Kot
02	10	Fazli Wahab	GHS, Marhatti Banda	GHS, Marhatti Banda
03	19	Muhammad Nasim	GHS, Behram Killi	GHS, Behram Killi
04	20	Raj Muhammad	GHSS, Ziarat Kaka Sahib	GHSS, Ziarat Kaka Sahib
05	22	Shakir Ullah	GHS, Mohib Banda	GHS, Mohib Banda
06	29	Muhammad Sanadi	GHS, No.1 NSR Cantt:	GHS, No.1 NSR Cantt:
07	34	Ihsan Ullah	GHS, Zakhi Qabristan	GHS, Zakhi Qabristan
08	36	Yahya Daud Shah	GHS, Dag Behsud	GHS, Dag Behsud
09	38	Afzal Ahmad	GHS, Pir Sabaq	GHS, Pir Sabaq
10	39	Afsar ul Mulk	GHS, Pabbi	GHS, Pabbi
11	40	Amin ul Haq	GHSS, Khair Abad	GHSS, Khair Abad
12	44	Rizwan Ullah Shah	GHS, Banda Sheikh Ismail	GHS, Banda Sheikh Ismail
13	45	Lal Mir <i>M.A B.Ed</i>	GHS, Aza Khel Payan	GHS, Aza Khel Payan
14	47	Ayub Rahman	GHS, Rashakai	GHS, Rashakai

Note: - As per Policy our share is 25 but only 14 were upgrade, due to not-qualifying the required qualification and length of service. The remains were not promoted.

Terms and Conditions: -

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by each rules and regulation as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period, in case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-seniority on lower post will remain intact.
6. No TA / DA is allowed for joining his duty.
7. They will given an under taking to recorded in their service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted he will be reversed.

(Haji Masarat Gul Khattak)
District Education Officer (Male)
Nowshera

Endst: No. 1823-27/DEO(M)NSR/EA-S/File No.1/Promotion Sr. Qari B-15. Dated Nowshera the 12/04/2013

Copy of the above is forwarded for information and necessary action to the: -

1. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. Senior District Accounts Officer, Nowshera.
3. Deputy District Education Officer (Male), Local Office.
4. Principal / Head Master Concerned.
5. Officials Concerned.

Mamoor Khan
District Education Officer (Male)
Nowshera
12/4/13

ATTESTED

[Signature]

Ann - "C"

SSTs (M) Nowshetra

(3 pages)



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

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

7

Notification

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

A. SST (Bio-Chem)

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

Total No. of SST Bio-Chem (M) Posts vacant Posts	37
25% share initial recruitment	9
75% share for Promotion.	28
40 % Share of promotion of SCT/CT	15
Posts available for promotion	15
Promoted through this order	07

S.N	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	02	Masir Mahmood	GHS, Baghban Pura	07/15/1970	Services placed at the disposal of DEO (M) Nowshetra for further posting against SST (Bio-Chem) post on school based.
2	03	Aziz Ullah	GHS, A.C Centre	02/16/1967	do
3	08	Ghulam Raziq	GHS, Zokhi Qabran	10/20/1969	do
4	29	Muhammad Ayub Shah	GHS, Nan Garh	04/13/1968	do
5	66	Asghar Khan	GHS, Ali Baig	03/15/1973	do
6	68	Muhammad Jamil Shah	GHS, No.2 Pir Pai	12/05/1968	do
7	409	Zafar Khan	GMS, Aziz Abad	01/03/1967	do

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

Total No. of SST Bio-Chem (M) Posts vacant Posts	37
25% share initial recruitment	9
75% share for Promotion.	28
20 % Share of promotion of PSHT/SPST/PST	07
Posts available for promotion	07
Promoted through this order	04

S.N	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	032	Nadir Khan	GPS No.4 Nowshera kulan	8/15/1970	Services placed at the disposal of DEO (M) Nowshetra for further posting against SST (Bio-Chem) post on school based.

[Handwritten signature]

Total No. of SST General (M) Posts vacant Posts	23
25% share initial recruitment	23
75% share for Promotion.	70
4 % Share of promotion of SAT/AT	04
Posts available for promotion	04
Promoted through this order	04

S.No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	16	Hussain Gul	GHS Kahi	11/1/1961	Services placed at the disposal of DEO (M) Nowshetra for further posting against SST (General) post on school based.
2	21	Muhammad Haneef	GHS No2 NSR Kalan	7/1/1965	-----do-----
3	24	Shah Jehan	GHS Pashtoon Ghari	11/21/1965	-----do-----
4	35	Fazli Hadi	GHS Pabbi	4/28/1958	-----do-----

5. PROMOTION OF STT/TT TO THE POST OF SST (General) BPS-16.

Total No. of SST General (M) Posts vacant Posts	23
25% share initial recruitment	23
75% share for Promotion.	70
4 % Share of promotion of STT/TT	04
Posts available for promotion	04
Promoted through this order	04

S. No	S.L. No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	13	Ali Akbar	GMS, Camp Koroonna	05/04/1959	Services placed at the disposal of DEO (M) Nowshetra for further posting against SST (General) post on school based.
2	24	Riaz Afzal	GHSS, Nizampur	15/03/1970	-----do-----
3	38	Fazal Raziq	GHS, Mulla Killi	20/07/1970	-----do-----
4	40	Muhammad Tariq	GHSS, Risalpur	29/12/1971	-----do-----

6. PROMOTION OF S Qari/Qari TO THE POST OF SST (General) BPS-16

Total No. of SST General (M) Posts vacant Posts	23
25% share initial recruitment	23
75% share for Promotion.	70
3 % Share of promotion of S Qari/Qari	04
Posts available for promotion	03
Promoted through this order	03

S.N	S.L.No	Name of Official	Present Place of Posting	Date of Birth	Remarks
1	20	Mumoor Khan	GHS Pabbi	5/10/1957	Services placed at the disposal of DEO (M) Nowshetra for further posting against SST (General) post on school based.
2	28	Faiz ur Rahman	GMS Malak Aman	1/10/1974	-----do-----
3	31	Amin ul Haq	GHS Kahi	3/4/1965	-----do-----

Terms and conditions:-

1 They would be on probation for a period of one year extendable for another one year.

ATTESTED

[Signature]

To be challenged

SSTs (M) Nowshehra 7

9

- 1 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 2 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 8 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 9 Their posting will be made on School based. They will have to serve at the place of posting, and their service is not transferable to any other station.
- 10 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

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

3331-85

Endst: No. / File No.2/Promotion SST B-16: Dated Nowshehra the 23-10-2014

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Nowshehra.
 2. District Education Officer concerned
 3. District Accounts Officer concerned
 4. Official Concerned.
 5. PPS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 6. PA to the Director E&SE Khyber Pakhtunkhwa Nowshehra
 7. File

Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Nowshehra

ATTESTED



Am — D
2 pages (10)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA.

No. 4927/F.No. SST Promotion/TT/AT/PST/
Qari (M)

Dated Peshawar the 26/12 /2014

To,


The District Education Officers (M)
Nowshera.

Subject: - **APPEAL.**

Memo:-

I am directed to refer to the subject noted above and to enclose herewith a copy of appeal in respect of Mr. Lal Mir Qari GHS Aza Khel Payan District Nowshera for necessary action under the rules/policy.

Endst: No. _____


Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education local office.

Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

ATTESTED



The Honourable
Director, Elementary & Secy Edu
KPK Peshawar.

Sub:- Appeal for

R/Sir,

It is stated to your kind & sympathetic
honour that I Gari Lal Mir am
serving as Gari at GHS Aza Khel Pajon
(Nowshera) for the last few years. A
seniority list of Gari's issued by the
Honourable DEO NSR on 12-4-2013 in which
I am was on serial no 13.

In seniority list of Gari's for the post of
SST's serial No 11 is on top of I am
in the second position in recent Appointment
order of SST's from Gari quota I have been
dropped while Manzoor Khan Gari GHS
Pabli & Faizur Rehman GMS Malik Aman
Kromonah have been appointed
as SST's although both these teachers
were not in the existed in the seniority
list of Gari nor revised seniority list
has been released by the DEO NSR.

In this connection I have submitted
appeal in the office of DEO NSR but
I have not been satisfied from the
DEO office.

Your grace is requested to please
inquire into the matter with kindly.

Note:- Seniority list of Gari's & Appt order of SST from
Gari quota is attached herewith pl.

Yours obedient
Gari Lal Mir Gari
GHS Aza Khel Pajon
(NSR)

Handwritten signature

بعدالت سرویسز ٹریڈنگ کورپوریشن آف اے. پی. کے

کورٹ فیس

مورخہ: 2015 - 21-3-20 منجانب رال فرولہ فان فرسٹہ انفنٹیل ماہان

مقدمہ: تجارتی لٹل میرحال نام: حکومت محمودیہ سرحدوں کی فیصلہ برائے وکراہ

دعویٰ: سرویسز ٹریڈنگ

جرم:

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دیکھ کر کاروائی متعلقہ آن مقام لٹل اور کے لئے سید لستہ فال رولہ وانڈسٹ ٹریڈنگ مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی نکل کاروائی کا مکمل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخی دائر کرنے کی اپیل بگرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مذکور کے عمل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برداختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا تاکہ سند ہے

المرقوم _____ ماہ _____ 2015ء

العبد گواہ شہادہ العبد

کے لئے منظور ہے۔

Accepted & attested

Sh. A. H. C.
at number

بمقام

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

266/2015
Appeal No. ~~101/15~~

Mr. Qari Lal Meer.....Appellant

VERSUS

1- Secretary (E & S) Education Govt: of Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

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Deponent

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

266/2015

Appeal No 266/2015

Mr. Qari Lal Meer.....Appellant

VERSUS

1- Secretary (E & S) Education Govt: of Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

AFFIDAVITE

I Inam Khan (Toru) District Education Officer (M) Nowshera do solemnly affirmed and declare on oath that the contents of Par wise comments/ reply on behalf of respondent are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Deponent

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No 266/2015

Mr. Qari Lal Meer.....Appellant

VERSUS

1- Secretary (E & S) Education Govt: of Khyber Pakhtunkhwa, Peshawar & others.
..... Respondents

Respectively Sheweth

Written comments/reply on behalf of respondent No 1, 2, 3.

Preliminary Objections

1. That the Appellant has no cause of action/locus standi to file the instant appeal.
2. That this honorable service tribunal has got no jurisdiction to entertain the present appeal.
3. That the present Appeal is bad for mis joinder and non-joinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this honorable service tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is not maintainable in its present form.

Factual Objection

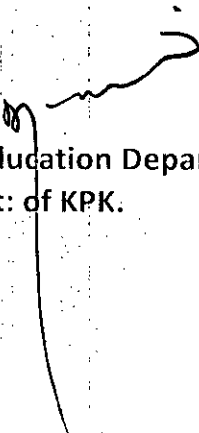
1. Pertains to the appellant record.
2. Pertains to the appellant record.
3. In Correct. The respondent No.5 i.e Faiz Ur Rehman S/o Muhammad Akram was appointed in the year 1992. At that Time the requisite qualification for the post of Qari was Tajweed only with SSC, but later on in the year 2012 the requisite qualification i.e the criteria for the appointment of Qari Post was FA+ Tajweed and Hifz ul Quran. The respondent No.5 was qualified with the requisite qualification for the post of Qari and was appointed in the year 1992. He was left from up gradation to senior Qari BPS-15 due to not acquire Hifz ul Quran sanad. According to rules up gradation to SST (G) Post can be made from S.Qari /Qari on the basis of seniority. (Guideline is attached herewith)
4. In Correct. The Appellant was appointed on 5/5/1996 and at serial No.46 of the seniority list while respondent No.5 was appointed on 18/4/1992 and at serial No.28 of the seniority list. The respondent^{No.5} was BA/ B.Ed and was fit for promotion to SST post under the seniority cum fitness.
5. In correct as explained in above para.
6. Pertain to record.
7. That the appellant has got no cause of action to file instant appeal.

Grounds:

- A. In correct. The notification is according to natural justice and promotion policy.
- B. In correct. The respondent No.5 ^{was} is qualified for promotion to BPS-16 as per policy and seniority list.
- C. In correct as replied in para-4 of facts.
- D. In correct. The respondents also seeks permission of this Honorable Tribunal to rely on additional grounds at the time of hearing.

It is therefore, requested before your honor that the present appeal is against facts and without force, may kindly be dismissed with cost.

Respondent No.2



Secretary Education Department,
Govt: of KPK.

Respondent No.3&4



District Education Officer (M)
Nowshera

TENTATIVE SENIORITY LIST OF QARI TEACHERS DISTRICT NOWSHERA

Annex "A"

1	2	3	4	5	6	7	8	9	10	11	12	13	14
S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual:	B.A with Division	Professional Qualification	M.A with Subject	Date of Birth	Date of 1st Apptt: in Edu. Deptt:	Date of regular Apptt: against the Post	Date of taking over charge against the present Post
1	GHS, Tarkha	Farhad Khan	Ashraf Khan	NSR	12	S.S.C	----	Aalamin	NIL	10/11/1952	08/01/1974	08/01/1974	08/01/1974
2	GHS, No.1 NSR Cantt:	Riaz Muhammad	Niaz Muhammad	NSR	12	S.S.C	----	Qirat Tajweed	NIL	11/01/1956	11/01/1974	11/01/1974	11/01/1974
3	GHSS, Risalpur	Muhammad Younas	Lal Khan	NSR	12	S.S.C			NIL	07/06/1952	19/03/1974	19/03/1974	19/03/1974
4	GHS, Aman Garh	Fazli Haq	Bashir Ahmad	NSR	10			Sanad Yafta	NIL	26/02/1955	23/02/1980	23/02/1980	23/02/1980
5	GHS, Misri Banda	Abdur Rahman	Lal Khan	NSR	10			Qarit		21/05/1958	22/11/1983	22/11/1983	22/11/1983
6	GHS, Dak Ismail Khel	Abdul Hanan	Muhammad Karim	NSR	10	----	----	Qirat Tajweed	NIL	01/05/1960	02/02/1984	02/02/1984	02/02/1984
7	GHS, Bara Banada	Abdul Karim	Abdul Rasheed	Charsada	10			Quarat	NIL	13/05/1956	08/05/1986	08/05/1986	08/05/1986
8	GHS, Khesghi Bala	Muhammad Ali	Hayat Gul	NSR	10		----	Sanad Yafta	NIL	14/04/1961	05/08/1986	05/08/1986	05/08/1986
9	GHS, Shah Kot	Muhammad Bilal	Gul Muhammad	NSR	10	F.A		Sanad Hefeez	NIL	01/03/1965	01/10/1986	01/10/1986	01/10/1986
10	GHSS, Akbar Pura	Abdul Mabood	Ghulam Said	NSR	10	S.S.C	----	Qari	NIL	05/04/1967	01/10/1986	01/10/1986	01/10/1986
11	GHS, Marhatti Banda	Fazli Wahab	Ayob Khan	NSR	12	F.A	----	Sanad Yafta	NIL	20/08/1967	02/11/1986	02/11/1986	02/11/1986
12	GHS, Mughalki	Ghulam Rasool	Mustaqim Khan	NSR	12	S.S.C	----	Qirat Tajweed	NIL	10/11/1962	04/11/1986	04/11/1986	04/11/1986
13	GHS, Pashtoon ghari	Baz Muhammad	Wali Muhammad	NSR	10	Middle		Qirat Tajweed	NIL	26/04/1961	07/05/1987	07/05/1987	07/05/1987
14	GHS, Taru Jabbaa	Hussain Khan	Juma Khan	NSR	10	Primary	----	Sanad Yafta	NIL	01/09/1962	14/05/1987	14/05/1987	14/05/1987
15	GHS, Mian Essa	Muhammad AbdullahJan	Gul Shahzada	NSR	7	----	----	Hafiz Quran	NIL	03/05/1966	09/01/1988	09/01/1988	09/01/1988
16	GHSS, Nizam Pur	Muhammad Aman	Waris Gul	NSR	7	SSC	----	Sanad Farigh	NIL	01/11/1968	29/11/1988	29/11/1988	29/11/1988
17	GHS, Adamzai	Sher Rahman	Khalil ur Rahman	NSR	7	Primary	----	Qirat Tajweed	NIL	05/01/1962	01/12/1988	01/12/1988	01/12/1988
18	GHSS, Khesghi Payan	Mukhtiar Ahmad	Bahadar Khan	NSR	7	Hafiz e Quran	----	Sanad Yafta	NIL	30/11/1962	01/12/1988	01/12/1988	01/12/1988
19	GHS, Aza Khel Bala	Jameel Hussain	Fazal Muhammad	NSR	7			Qirat Tajweed	NIL	26/07/1965	01/12/1988	01/12/1988	01/12/1988
20	GHS, Behram Killi	Muhammad Nasim	Sher Afzal	NSR	12	M.A	2nd	Qirat Tajweed	Islamyat	29/03/1967	01/12/1988	01/12/1988	01/12/1988
21	GHSS, Ziarat Kaka Sahib	Raj Muhammad	S. Anwar Shah	NSR	12	F.A	----	Tahfeezul Quran	NIL	10/10/1968	01/12/1988	01/12/1988	01/12/1988
22	GHS, Ali Baig	Rizwan Ullah	Rahmat Ullah	Pesh	12	S.S.C	----	Qirat Tajweed	NIL	16/09/1967	18/09/1989	18/09/1989	18/09/1989
23	GHS, Mohib Banda	Shakir Ullah	Abdul Haleem	Pesh	12	F.A	----	Qirat Tajweed	NIL	16/02/1968	15/10/1989	15/10/1989	15/10/1989
24	GHSS, Pir Pai	Fazle Hadi	Abdul Jalil	Pesh	7	S.S.C	----	Qirat Tajweed	NIL	02/02/1963	07/01/1984	06/12/1989	06/12/1989
25	GHS, Jabbi	Shams ur Rahman	Abdul Ahad	NSR	7	S.S.C	----	Tajweed	NIL	11/06/1970	26/11/1990	26/11/1990	26/11/1990
26	GHS, Pabbi	Mamoor Khan	Said Hussain	NSR	9	M.A	2nd L	Bed	Islamiat	10/05/1957	02/04/1992	02/04/1992	02/04/1992
27	GHS, Mulla Killi	Gulzar Muhammad	Mewa Din	NSR	7	S.S.C	----	Qirat Tajweed	NIL	11/12/1960	14/04/1992	14/04/1992	14/04/1992
28	GMS, Sheikhan	Faiz ur Rahman	Muhammad Akram	NSR	9	M.A	2nd	Qirat Tajweed	Islamiat	10/01/1974	18/04/1992	18/04/1992	18/04/1992
29	GHS, No.2 Pir Pai	Anwar ul Haq	Mehfooz ul Haq	NSR	7	Middle	----	Wifaq Madaras	NIL	15/04/1971	26/04/1992	26/04/1992	26/04/1992
30	GHS, No.1 NSR Cantt:	Muhammad Sanadi	Muhammad Tahir	NSR	12	F.A	----	Qirat Tajweed	NIL	30/09/1972	28/04/1992	28/04/1992	28/04/1992
31	GMS, Aza Khel Bala	Abdul Latif	Asmat Khan	NSR	7	Sanad Yafta				24/05/1905	19/05/1992	19/05/1992	19/05/1992
32	GCMHS, Akora Khattak	Noor ul Haq	Sahib ul Haq	NSR	12	S.S.C	----	Sanad Yafta	NIL	10/08/1970	01/06/1992	01/06/1992	01/06/1992
33	GHS, Inzari	Hazrat Khan	Abdur Rahman	NSR	B07	SSC		Tajweed ul Quran	NIL	11/10/1958	14/09/1992	14/09/1992	14/09/1992
34	GHS, No.1 Shaidu	Zakir Hussain	Raqib Gul	NSR	7	F.A	----	Sanad Wifaq	NIL	22/02/1969	10/01/1993	10/01/1993	10/01/1993
35	GHS, Zakhri Qabristan	Ihsan Ullah	Muhammad Ilyas	NSR	12	B.A	2nd	Qirat Tajweed	NIL	07/05/1972	01/09/1993	01/09/1993	01/09/1993
36	GMS, Aman Garh	Gohar Ali	Wazir Muhammad	NSR	12	F.A	----	shahadatul Aalia	NIL	01/02/1973	08/12/1993	08/12/1993	08/12/1993
37	GHS, Dag Behsud	Yahya Daud Shah	Mufti Daud Shah	NSR	12	F.A		Sanad Yafta		25/01/1974	12/05/1994	12/05/1994	12/05/1994
38	GHS, Spin Khak	Badiuz Zaman	Itbar Gul	NSR	12	S.S.C	----	Sanad Yafta	NIL	15/11/1970	13/05/1994	13/05/1994	13/05/1994
39	GHS, Pir Sabaq	Afzal Ahmad	Shah Nazar	NSR	12	F.A	----	Tajweed-ul-Qurran	NIL	02/01/1975	13/05/1994	13/05/1994	13/05/1994
40	GHS, Pabbi	Afsar ul Mulik	Hussain Khan	Charsada	12	M.A	3rd	Bed	Pashto	01/01/1971	05/09/1994	05/09/1994	05/09/1994

TENTATIVE SENIORITY LIST OF QARI TEACHERS DISTRICT NOWSHERA

1	2	3	4	5	6	7	8	9	10	11	12	13	14
S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual.	B.A with Division	Professional Qualification	M.A with Subject	Date of Birth	Date of 1st Apptt: in Edu: Deptt:	Date of regular Apptt: against the Post	Date of taking over charge against the present Post
41	GHSS, Khair Abad	Amin ul Haq	Khan Madin	NSR	12	B.A	2nd	B.Ed		14/03/1965	07/12/1994	07/12/1994	07/12/1994
42	GHS, Jarooba	Ghani Akbar	Muhammad Akbar	NSR	7	M.A	2nd	C.T	Pashto	11/11/1968	12/12/1994	12/12/1994	12/12/1994
43	GHS, Baghban Pura	Muhammad Farooq	Muhammad Iqbal	NSR	7	F.A	----	Qirat Tajweed	NIL	08/01/1972	01/01/1995	01/01/1995	01/01/1995
44	GHS, Zara Miana	Saif ul Islam	Hussain Badshah	NSR	12	B.A	2nd	Qirat Tajweed	NIL	15/01/1973	02/05/1995	02/05/1995	02/05/1995
45	GHS, Banda Sheikh Ismail	Rizwan Ullah Shah	Muthair Shah	NSR	12	F.A		Qirat Tajweed	NIL	05/04/1976	01/09/1995	01/09/1995	01/09/1995
46	GHS, Aza Khel Payan	Lal Mir	Khan Mir	NSR	12	B.A	1st	Qirat Tajweed	NIL	01/02/1975	05/05/1996	05/05/1996	02/05/1996
47	GMS, Sheikh Ahmad Baba	Mukhtiar Muhammad	Raz Muhammad	Charsada	12	S.S.C	----	Fazil Denyat	NIL	08/05/1977	01/11/1996	01/11/1996	01/11/1996
48	GHS, Rashakai	Attaur Rahman	Sultan Muhammad	NSR	12	M.A	2nd	Qari / C.T	Islamiat	20/04/1974	28/06/1997	28/06/1997	28/06/1997
49	GMS, Sadu Khel	Rahim Zeb	Amin Khan	NSR	12	M.A	2nd	Qirat Tajweed	Islamiat	10/04/1987	01/10/2009	01/10/2009	01/10/2010
50	GHS, A.C Centre	Faiz Rasan	Fazle Subhan	NSR	12	M.A	2nd		Islamiyat	10/10/1978	01/02/2007	26/05/2012	26/05/2012
51	GHSS, Jallozai	Faiz ul Azeem	Fazal Azeem	NSR	7	M.A		Qirat Tajweed	Arabic	02/01/1979	26/05/2012	26/05/2012	26/05/2012
52	GHS, Nawan Killi	Amir Ullah	Irshad Khan	NSR	9	B.A	2nd	Sanad Yafta		01/03/1984	26/05/2012	26/05/2012	26/05/2012
53	GHS, No.1 NSR Kalan	Fazlullah	Zar Muhammad	NSR	9	B.Com	2nd	Sanad Yafta		10/11/1989	26/05/2012	26/05/2012	26/05/2012
54	GHS, Phari Katti Khel	Mukhtar Ahmad	Abdul Wahid	NSR	9	B.A	2nd	B.Ed		15/12/1964	28/05/2012	28/05/2012	28/05/2012
55	GHSS, Manki Sharif	Rab Nawaz	Muhammad Saeed	NSR	9	M.A		Sanad Yafta		15/05/1977	28/05/2012	28/05/2012	28/05/2012
56	GHS, Marooba	Muhammad Asif Ali	Muhammad Ghulam	NSR	9	M.A		Sanad Yafta		01/03/1978	28/05/2012	28/05/2012	28/05/2012
57	GHS, Jehangira Road	Muhammad Zahid Khan	Nawab Khan	NSR	9	B.A	1st	Sanad Yafta		12/05/1978	26/05/2012	26/05/2012	26/05/2012
58	GHS, Kahi	Muhammad Ishfaq	Sultan Wali	NSR	9	M.A	2nd	Aalamia	Islamiyat	11/01/1980	28/05/2012	28/05/2012	28/05/2012
59	GHS, Khawrai	Muh. Asif ur Rahman	Atta ur Rahman	NSR	9	B.A		Sanad Yafta		05/01/1981	28/05/2012	28/05/2012	28/05/2012
60	GHS, Afrido Killi	Muhammad Rashid	Hassan Muhammad	NSR	9	M.A		Sanad Yafta		07/04/1981	28/05/2012	28/05/2012	28/05/2012
61	GHS, Deri Kati Khel	Farhat Rasool	Ghulam Rasool	NSR	9	B.A		Sanad Yafta		12/04/1981	28/05/2012	28/05/2012	28/05/2012
62	GHS, Samandar Garhi	Fazli Hamid	Sufaid Gul	NSR	12	B.A		Sanad Yafta		01/04/1982	28/05/2012	28/05/2012	28/05/2012
63	GHS, Aman Garh L.C.	Zaibullah	Malik Azizur Rahman	NSR	9	M.A		Sanad Yafta		27/12/1982	28/05/2012	28/05/2012	28/05/2012
64	GHS, Mali Khel Bala	Shah Nawaz Khan	Haji Bahadar	NSR	9	M.A	2nd	B.Ed	Arabic	20/01/1983	28/05/2012	28/05/2012	28/05/2012
65	GHS, No.2 Shaidu	Asad Ullah	Muhammad Ghulam	NSR	9	B.A		Sanad Yafta		15/03/1983	28/05/2012	28/05/2012	28/05/2012
66	GHS, Wazir Garhi	Asif Shah	Yaqoob Shah	NSR	12	M.A	2nd		Islamiyat	02/04/1983	28/05/2012	28/05/2012	28/05/2012
67	GHS, Wattar.	Abdul Bari Jan	Nisar Muhammad	NSR	9	B.A		Sanad Yafta		27/05/1983	28/05/2012	28/05/2012	28/05/2012
68	GHS, Kotli Saleh Khana	Asad Daud	Muhammad Daud	NSR	9	B.A		Sanad Yafta		01/06/1983	28/05/2012	28/05/2012	28/05/2012
69	GHS, Ganderi Payan	Muhammad Tufail	Aurangzeb	NSR	9	B.A		Sanad Yafta		01/12/1984	28/05/2012	28/05/2012	28/05/2012
70	GHS, Gharib Pura	S. Nisar Ali Shah	S. Waheedullah Shah	NSR	9	M.A		Sanad Yafta		13/04/1985	28/05/2012	28/05/2012	28/05/2012
71	GHS, Manahi	Bashir Ahmad	Muhammad Younas	NSR	9			Sanad Yafta		28/02/1986	28/05/2012	28/05/2012	28/05/2012
72	GHS, Khesari	Hamdullah	Saleem Khan	NSR	9	B.A		Sanad Yafta		15/02/1987	28/05/2012	28/05/2012	28/05/2012
73	GHS, No. 2 NSR Kalan	Muhammad Usman	Muhammad Hanif	NSR	9	M.A		Sanad Yafta		12/03/1987	28/05/2012	28/05/2012	28/05/2012
74	GHS, Badrashhi	Salman Khan	Atta Ullah Khan	NSR	9	B.A	2nd	Sanad Yafta		01/02/1988	28/05/2012	28/05/2012	28/05/2012
75	GHS, Dagi Banda	Jalal Hussain	Faqir Hussain	NSR	9	B.A		Sanad Yafta		02/03/1988	28/05/2012	28/05/2012	28/05/2012
76	GHS, Jabba Khushk	Nadeem Khan	Ghani ur Rahman	NSR	9	M.A	2nd	Sanad Yafta	Islamiyat	30/03/1988	28/05/2012	28/05/2012	28/05/2012
77	GHS, No.2 NSR Cantt:	Saif Ali Shah	Nadar Shah	NSR	9	B.A		Sanad Yafta			28/05/2012	28/05/2012	28/05/2012

Annex "B"

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-33857
No. _____ / Promotion to B-16/Estab
Dated Peshawar the 23/12/2013.

To

All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Working Papers for Departmental Promotion Committees for the Promotion of SCT/CT, SAT / AT, STT/ TT, SDM / DM, PSHT/SPST/PST, S Qari/Qari to the post of SST Bio-Chem, SST Phy-Maths, STT (Genral BPS-16).

Memo:

I am directed to refer to the subject noted above and to state that meeting of Departmental Promotion Committee for Promotion to the of vacant posts SST Bio-Chem, SST Phy-Maths, STT (Genral BPS-16), in CMS/Middle /High and Higher Secondary Schools in Elementary and Secondary Education Department at District Level will be held on 10.01.2014

I am further directed to ask you to submit Working Papers for Departmental Promotion Committees for the Promotion of SCT/CT, SAT / AT, STT/ TT, SDM / DM, PSHT/SPST/PST, S Qari/Qari to the post of SST Bio-Chem, SST Phy-Maths, STT (Genral BPS-16) on the format already submitted in separate file for each category upto 5th Jan, 2014 and the following documents are required to be attached with the Working Papers

1. Final Seniority List undisputed
2. Synopsis of last 5 years ACRs.
3. Last three years result.
4. Non involvement certificate.
5. Bio data on the format already submitted.
6. Last pay slip.
7. BA/BSC Degree
8. B.Ed/M.Ed

Dairy No. 1981 dt 15-2-2014
OIO The DEO (II) NSR

Note ACRs be kept ready and to be presented in the meeting of Departmental Promotion Committee.

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

3825-27

Endst: No. _____ / File No.1/Promotion B-15 to B-16: Dated Peshawar the 23/12/2013.

Copy forwarded for information and necessary action to the: -

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. M/File

Dy: Director (Estab)

Elementary and Secondary Education

Annex "C"

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/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, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1.	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

			recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	20-35 years (a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3: Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3; Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and

(ii) against Serial No. 11, as so rendered, for the existing entries, the following shall be substituted, in respective columns, namely:

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology),</p> <p style="text-align: center;">Or</p> <p>(b) (Physics, Maths "A" or "B" or Statistics)</p> <p style="text-align: center;">Or</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manners:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="text-align: center;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

- (c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:*

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:*

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion, then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- ✓(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

			<p><i>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</i></p> <p><i>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</i></p> <p><i>(ii) twenty Five percent by initial recruitment.</i></p> <p>Note:</p> <p><i>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</i></p> <p><i>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</i></p>
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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file


(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

لعدالت صدر و مندر بہر ہونے پر شمارہ

قاری لعل میر خان بیگم فیض الرحمن

عشرین .. وصول برمانہ کی رقم پہنچ جانے پر

جناب عالی ..

مدرسہ لبتون بالا لعدالت صدر و مندر بہر ہونے پر شمارہ میں ایک کچھ ہونے عطا
میں امرتسر ضلع 15-11-24 لعدالت صدر و مندر بہر ہونے پر شمارہ میں
پانچ صد روپیہ برمانہ سر دیا ہے

۲۰۰ مندر فیض الرحمن کے مقدمہ پر پانچ صد روپیہ حکم عدالت صدر
میں حاصل (قاری لعل میر خان) لعدالت صدر و مندر بہر ہونے پر شمارہ میں
مندر کچھ ہے

۲۴/۱۱

Handwritten signature

قاری لعل میر خان میر

CNIC 100,17201-0724315-1

کے بارے میں، اس میں شامل پانچ صد روپیہ

Call = 0300-5777471

Attested
28.11.15

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No266/2015

Mr. Qari Lal Meer.....**Appellant**

VERSUS

Secretary (E&S) Education Govt of Khyber Pakhtunkhwa,
Peshawar & others.....**Respondents**

INDEX

S.NO	Description Of Documents	Annex	Pages
1	Para wise comments alongwith Affidavit		1-3
<u>2</u>	Copy of Seniority List	<u>A</u>	4-5
<u>3</u>	Copies of Guide line from Director (E&SE)	B	6
<u>4</u>	Copies of Policy	C	7-13

Respondent No.5
Through


Rahman Ullah

Advocate Peshawar
25-A Nasir Mansion,
Shoba Bazar, Peshawar
Cell: 0333-9125367

(1)

IN THE SERVICE TRIBUNAL ,K.P.K PESHAWAR

Service Appeal No266/2015

Mr. Qari Lal Meer.....**Appellant**

VERSUS

Secretary (E&S) Education Govt of Khyber Pakhtunkhwa,
Peshawar & others.....**Respondents**

COMMENTS ON BEHALF OF RESPONDENT NO.5

Respectfully Sheweth:

Respondent No.5 humbly submits as under;

Preliminary Objection:

1. That the appellant has no cause of action/locus standi to file appeal against the answering Respondent no.5.
2. That the present appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the instant appeal is badly time barred.
4. That the appellant has concealed material facts from this honorable service tribunal.
5. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
6. That the instant appeal is not maintainable in its present form.
7. That the appellant has not come to the court with clean hands.

Facts:

1. That Para- 1 of the facts Pertains to the record, need solid proof, moreover the appellant not working as SS teacher but as Qari.
2. Para 2 of the facts pertain to the record.
3. In Correct. The respondent No.5 i.e Faiz Ur Rehman S/o Muhammad Akram was appointed in the year 1992. At the time of the requisite qualification for the post of Qari was Tajweed only with SSC, but later on in the year 2012 the requisite qualification i.e. the criteria for the appointment of Qari post was FA+ Tajweed and Hafiz Ul Quran. The respondent No.5 was qualified with the requisite qualification from the post of Qari and was appointed in the year 1992. He was left from up gradation to Senior Qari(15) post and can be made SST (BPS-16) on the basis of Seniority, the appellant promote Qari to S Qari, moreover the appellant only 8 months on the said post and the policy reward 5 Years experience and Respondent No.5 have 23 years experience on the post of Qari, while as per policy 5 years experience is required, MA B Ed. **(Guideline is attached herewith).**
4. In Correct. The appellant was appointed on 5/5/1996 and at serial No.46 of the seniority list while respondent no.5 was appointed on 18-4-1992 and at serial No.28 of the seniority list. The Respondent No.5 was M.A/B.Ed and was fit for promotion to SST post under the seniority cum fitness.
5. In correct as explained in above Para.
6. Pertain to record.
7. That the appellant has got no cause of action to file instant appeal.

GROUND:

- A. Incorrect and wrong, moreover the notification is according to law, Rule, regulation and policy on the subject.
- B. In correct. The Respondent no.5 was qualified for promotion to BPS-16 as per policy and seniority list.
- C. Incorrect as replied in Para- 4 of fact.
- D. In Correct. The respondent also seeks permission of this Honorable Tribunal to rely on additional ground at the time of hearing.

It is therefore most humbly prayed that on acceptance of these comments the Hon,ble tribunal may kindly dismissed the appeal of appellant with special cost.

Respondent no.5

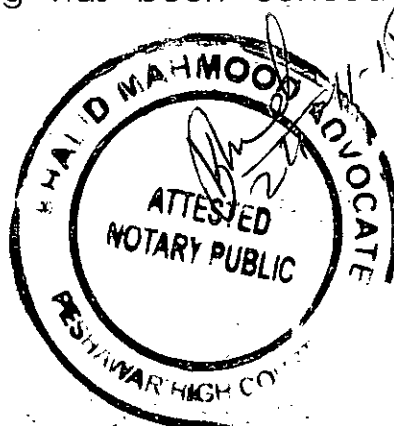
Through

Rahmanullah
Rahmanullah

Advocate, Peshawar

AFFIDAVIT:

I Faiz Ur Rehman S/o Muhammad Akram, Teacher Govt High School Mula Killi, District Nowshera., do hereby solemnly affirm and declare on oath that the contents of the accompanying comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon,ble Tribunal.



DEPONENT

(4)
TENTATIVE SENIORITY LIST OF QARI TEACHERS DISTRICT NOWSHERA

Annex 'A'

1	2	3	4	5	6	7	8	9	10	11	12	13	14
S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual.	B.A with Division	Professional Qualification	M.A with Subject	Date of Birth	Date of 1st Appnt: in Edu: Dept:	Date of regular Appnt: against the Post	Date of 1st over char: against the Post
1	GHS, Tarkha	Farhad Khan	Ashraf Khan	NSR	12	S.S.C	----	Aalamia	NIL	10/11/1952	08/01/1974	08/01/1974	08/01/1974
2	GHS, No.1 NSR Caniz	Riaz Muhammad	Niaz Muhammad	NSR	12	S.S.C	----	Qirat Tajweed	NIL	11/01/1956	11/01/1974	11/01/1974	11/01/1974
3	GHSS, Risalpur	Muhammad Younas	Lal Khan	NSR	12	S.S.C	----	Sanad Yafsa	NIL	07/06/1952	19/03/1974	19/03/1974	19/03/1974
4	GHS, Aman Garh	Fazli Haq	Bashir Ahmad	NSR	10		----	Qarit		26/02/1955	23/02/1980	23/02/1980	23/02/1980
5	GHS, Misri Banda	Abdur Rahman	Lal Khan	NSR	10		----	Qirat Tajweed	NIL	21/05/1958	22/11/1983	22/11/1983	22/11/1983
6	GHS, Dak Ismail Khel	Abdul Hanan	Muhammad Karim	NSR	10		----	Quarat	NIL	01/05/1960	02/02/1984	02/02/1984	02/02/1984
7	GHS, Bara Banada	Abdul Karim	Abdul Rasheed	Charsada	10		----	Sanad Yafsa	NIL	13/05/1956	08/05/1986	08/05/1986	08/05/1986
8	GHS, Kheshgi Bala	Muhammad Ali	Hayat Gul	NSR	10		----	Sanad Hefceez	NIL	14/04/1961	05/08/1986	05/08/1986	05/08/1986
9	GHS, Shah Kot	Muhammad Bilal	Gul Muhammad	NSR	10	F.A	----	Qari	NIL	01/03/1965	01/10/1986	01/10/1986	01/10/1986
10	GHSS, Akbar Pura	Abdul Maboood	Ghulam Said	NSR	10	S.S.C	----	Sanad Yafsa	NIL	05/04/1967	01/10/1986	01/10/1986	01/10/1986
11	GHS, Marhatti Banda	Fazli Wahab	Ayob Khan	NSR	12	F.A	----	Qirat Tajweed	NIL	20/08/1967	02/11/1986	02/11/1986	02/11/1986
12	GHS, Mughalki	Ghulam Rasool	Mustaqim Khan	NSR	12	S.S.C	----	Qirat Tajweed	NIL	10/11/1962	04/11/1986	04/11/1986	04/11/1986
13	GHS, Pashtoon ghari	Bez Muhammad	Wali Muhammad	NSR	10	Middle	----	Qirat Tajweed	NIL	26/04/1961	07/05/1987	07/05/1987	07/05/1987
14	GHS, Taru Jabbaa	Hussain Khan	Juma Khan	NSR	10	Primary	----	Sanad Yafsa	NIL	01/09/1962	14/05/1987	14/05/1987	14/05/1987
15	GHS, Mian Essa	Muhammad Abdullah Jan	Gul Shahzada	NSR	7	----	----	Hafiz Quran	NIL	03/05/1966	09/01/1988	09/01/1988	09/01/1988
16	GHSS, Nizam Pur	Muhammad Aman	Waris Gul	NSR	7	SSC	----	Sanad Farigh	NIL	01/11/1968	29/11/1988	29/11/1988	29/11/1988
17	GHS, Adamzai	Sher Rahman	Khalil ur Rahman	NSR	7	Primary	----	Qirat Tajweed	NIL	05/01/1962	01/12/1988	01/12/1988	01/12/1988
18	GHSS, Kheshgi Pay...	Melhanur Ahmad	Bahadar Khan	NSR	7	Hafiz e Quran	----	Sanad Yafsa	NIL	30/11/1962	01/12/1988	01/12/1988	01/12/1988
19	GHS, Aza Khel Bala	Jameel Hussein	Fazal Muhammad	NSR	7		----	Qirat Tajweed	NIL	26/07/1965	01/12/1988	01/12/1988	01/12/1988
20	GHS, Behram Killi	Mehammed Nasim	Sher Afzal	NSR	12	M.A	2nd	Qirat Tajweed	Islamiyat	29/03/1967	01/12/1988	01/12/1988	01/12/1988
21	GHSS, Ziarat Kaka Sahib	Raj Muhammad	S. Anwar Shah	NSR	12	F.A	----	Tahfeezul Quran	NIL	10/10/1968	01/12/1988	01/12/1988	01/12/1988
22	GHS, Ali Baig	Rizwan Ullah	Rahmat Ullah	Pesh	12	S.S.C	----	Qirat Tajweed	NIL	16/09/1967	18/09/1989	18/09/1989	18/09/1989
23	GHS, Mohib Banda	Shakir Ullah	Abdul Haleem	Pesh	12	F.A	----	Qirat Tajweed	NIL	16/02/1968	15/10/1989	15/10/1989	15/10/1989
24	GHSS, Pir Pai	Fazle Hadi	Abdul Jalil	Pesh	7	S.S.C	----	Qirat Tajweed	NIL	02/02/1963	07/01/1984	06/12/1989	06/12/1989
25	GHS, Jabbi	Shams ur Rahman	Abdul Ahad	NSR	7	S.S.C	----	Tajweed	NIL	11/06/1970	26/11/1990	26/11/1990	26/11/1990
26	GHS, Pabbi	Memoor Khan	Said Hussain	NSR	9	M.A	2nd	Bed	Islamiyat	10/05/1957	02/04/1992	02/04/1992	02/04/1992
27	GHS, Mulla Killi	Gulzar Muhammad	Mewa Din	NSR	7	S.S.C	----	Qirat Tajweed	NIL	11/12/1960	14/04/1992	14/04/1992	14/04/1992
28	GMS, Sheikhan	Faiz ur Rahman	Muhammad Akram	NSR	9	M.A	2nd	Qirat Tajweed	Islamiyat	10/01/1974	18/04/1992	18/04/1992	18/04/1992
29	GHS, No.2 Pir Pai	Anwar ul Haq	Mehfooz ul Haq	NSR	7	Middle	----	Wifaq Madaras	NIL	15/04/1971	26/04/1992	26/04/1992	26/04/1992
30	GHS, No.1 NSR Caniz	Muhammad Sanadi	Muhammad Tahir	NSR	12	F.A	----	Qirat Tajweed	NIL	30/09/1972	28/04/1992	28/04/1992	28/04/1992
31	GMS, Aza Khel Bala	Abdul Larif	Asmat Khan	NSR	7	Sanad Yafsa	----			24/05/1905	19/05/1992	19/05/1992	19/05/1992
32	GCMHS, Akora Khattak	Noer ul Haq	Sahib ul Haq	NSR	12	S.S.C	----	Sanad Yafsa	NIL	10/08/1970	01/06/1992	01/06/1992	01/06/1992
33	GHS, Inzari	Hazrat Khan	Abdur Rahman	NSR	B07	SSC	----	Tajweed ul Quran	NIL	11/10/1958	14/09/1992	14/09/1992	14/09/1992
34	GHS, No.1 Shaidu	Zakir Hussain	Raqib Gul	NSR	7	F.A	----	Sanad Wifaq	NIL	22/02/1969	10/01/1993	10/01/1993	10/01/1993
35	GHS, Zakhi Qabristan	Ihsan Ullah	Muhammad Ilyas	NSR	12	B.A	2nd	Qirat Tajweed	NIL	07/05/1972	01/09/1993	01/09/1993	01/09/1993
36	GMS, Aman Garh	Gohar Ali	Wazir Muhammad	NSR	12	F.A	----	shahada:ul Aafia	NIL	01/02/1973	08/12/1993	08/12/1993	08/12/1993
37	GHS, Dag Behsud	Yahya Daud Shah	Mufti Daud Shah	NSR	12	F.A	----	Sanad Yafsa		25/01/1974	12/05/1994	12/05/1994	12/05/1994
38	GHS, Spin Khak	Badruz Zaman	Itbar Gul	NSR	12	S.S.C	----	Sanad Yafsa		15/11/1970	13/05/1994	13/05/1994	13/05/1994
39	GHS, Pir Sabaq	Afzal Ahmad	Shah Nazar	NSR	12	F.A	----	Tajweed-ul-Qurra	NIL	02/01/1975	13/05/1994	13/05/1994	13/05/1994
40	GHS, Pabbi	Afser ul Muik	Hussain Khan	Charsada	12	M.A	3rd	Bed	Pashto	01/01/1971	05/09/1994	05/09/1994	05/09/1994

5
TENTATIVE SENIORITY LIST OF QARI TEACHERS DISTRICT NOWSHERA

1	2	3	4	5	6	7	8	9	10	11	12	13	14
S.No.	Name of School	Teacher Name	Father's Name	Domicile	BPS	Academic Qual.	B.A with Division	Professional Qualification	M.A with Subject	Date of Birth	Date of Ist Apptt: in Edu. Deptt:	Date of regular Apptt: against the Post	Date of takeover char against present Post
41	GHSS, Khair Abad	Amin ul Haq	Khan Madin	NSR	12	B.A	2nd	B.Ed		14/03/1965	07/12/1994	07/12/1994	07/12/1994
42	GHS, Jarooba	Ghani Akbar	Muhammad Akbar	NSR	7	M.A	2nd	C.T		11/11/1968	12/12/1994	12/12/1994	12/12/1994
43	GHS, Baghban Pura	Muhammad Farooq	Muhammad Iqbal	NSR	7	F.A	-----	Qirat Tajweed	Pashto	08/01/1972	01/01/1995	01/01/1995	01/01/1995
44	GHS, Zara Miana	Saif ul Islam	Hussain Badshah	NSR	12	B.A	2nd	Qirat Tajweed	NIL	15/01/1973	02/05/1995	02/05/1995	02/05/1995
45	GHS, Banda Sheikh Ismail	Rizwan Ullah Shah	Muthair Shah	NSR	12	F.A	-----	Qirat Tajweed	NIL	05/04/1976	01/09/1995	01/09/1995	01/09/1995
46	GHS, Aza Kuch Payan	Tal Mirza	Khan Mirza	NSR	12	B.A	1st	Qirat Tajweed	NIL	01/02/1975	05/05/1996	05/05/1996	02/05/1996
47	GMS, Sheikh Ahmad Baba	Mukhtiar Muhammad	Raz Muhammad	Charsada	12	S.S.C	-----	Fazil Denyat	NIL	08/05/1977	01/11/1996	01/11/1996	01/11/1996
48	GHS, Rashakai	Attaur Rahman	Sultan Muhammad	NSR	12	M.A	2nd	Qari / C.T	Islamiyat	20/04/1974	28/06/1997	28/06/1997	28/06/1997
49	GMS, Sadu Khel	Rahim Zeb	Amin Khan	NSR	12	M.A	2nd	Qirat Tajweed	Islamiyat	10/04/1987	01/10/2009	01/10/2009	01/10/2009
50	GHS, A.C Centre	Faiz Rasan	Fazle Subhan	NSR	12	M.A	2nd		Islamiyat	10/10/1978	01/02/2007	26/05/2012	26/05/2012
51	GHSS, Jalozai	Faiz ul Azeem	Fazal Azeem	NSR	7	M.A	-----	Qirat Tajweed	Arabic	02/01/1979	26/05/2012	26/05/2012	26/05/2012
52	GHS, Nawan Killi	Amir Ullah	Irshad Khan	NSR	9	B.A	2nd	Sanad Yafta		01/03/1984	26/05/2012	26/05/2012	26/05/2012
53	GHS, No.1 NSR Kalan	Fazlullah	Zar Muhammad	NSR	9	B.Com	2nd	Sanad Yafta		10/11/1989	26/05/2012	26/05/2012	26/05/2012
54	GHS, Phari Katti Khel	Mukhtar Ahmad	Abdul Wahid	NSR	9	B.A	2nd	B.Ed		15/12/1964	28/05/2012	28/05/2012	28/05/2012
55	GHSS, Manki Sharif	Rab Nawaz	Muhammad Saad	NSR	9	M.A	-----	Sanad Yafta		15/05/1977	28/05/2012	28/05/2012	28/05/2012
56	GHS, Marooba	Muhammad Asif Ali	Muhammad Ghulam	NSR	9	M.A	-----	Sanad Yafta		01/03/1978	28/05/2012	28/05/2012	28/05/2012
57	GHS, Jehangira Road	Muhammad Zahid Khan	Nawab Khan	NSR	9	B.A	1st	Sanad Yafta		12/05/1978	26/05/2012	26/05/2012	26/05/2012
58	GHS, Kahi	Muhammad Ishfaq	Sultan Wali	NSR	9	M.A	2nd	Aslamia	Islamiyat	11/01/1980	28/05/2012	28/05/2012	28/05/2012
59	GHS, Khawrai	Muh. Asif ur Rahman	Atta ur Rahman	NSR	9	B.A	-----	Sanad Yafta		05/01/1981	23/05/2012	28/05/2012	28/05/2012
60	GHS, Afrido Killi	Muhammad Rashid	Hassan Muhammad	NSR	9	M.A	-----	Sanad Yafta		07/04/1981	28/05/2012	28/05/2012	28/05/2012
61	GHS, Deri Kati Khel	Farhat Rasool	Ghulam Rasool	NSR	9	B.A	-----	Sanad Yafta		12/04/1981	28/05/2012	28/05/2012	28/05/2012
62	GHS, Samandar Garhi	Fazli Hamid	Sufaid Gul	NSR	12	B.A	-----	Sanad Yafta		01/04/1982	28/05/2012	28/05/2012	28/05/2012
63	GHS, Aman Garh L.C.	Zaibullah	Malik Azizur Rahman	NSR	9	M.A	-----	Sanad Yafta		27/12/1982	28/05/2012	28/05/2012	28/05/2012
64	GHS, Mali Khel Bala	Shah Nawaz Khan	Haji Bahadar	NSR	9	M.A	2nd	B.Ed	Arabic	20/01/1983	28/05/2012	28/05/2012	28/05/2012
65	GHS, No.2 Shaidu	Asad Ullah	Muhammad Ghulam	NSR	9	B.A	-----	Sanad Yafta		15/03/1983	28/05/2012	28/05/2012	28/05/2012
66	GHS, Wazir Garhi	Asif Shah	Yaqqob Shah	NSR	12	M.A	2nd		Islamiyat	02/04/1983	28/05/2012	28/05/2012	28/05/2012
67	GHS, Wattar	Abdul Bari Jan	Nisar Muhammad	NSR	9	B.A	-----	Sanad Yafta		27/05/1983	28/05/2012	28/05/2012	28/05/2012
68	GHS, Kotli Saleh Khana	Asad Daud	Muhammad Daud	NSR	9	B.A	-----	Sanad Yafta		01/06/1983	28/05/2012	28/05/2012	28/05/2012
69	GHS, Ganderi Payan	Muhammad Tufail	Aurangzeb	NSR	9	B.A	-----	Sanad Yafta		01/12/1984	28/05/2012	28/05/2012	28/05/2012
70	GHS, Gharib Pura	S. Nisar Ali Shah	S. Waheedullah Shah	NSR	9	M.A	-----	Sanad Yafta		13/04/1985	28/05/2012	28/05/2012	28/05/2012
71	GHS, Manahi	Bashir Ahmad	Muhammad Younas	NSR	9	-----	-----	Sanad Yafta		28/02/1986	28/05/2012	28/05/2012	28/05/2012
72	GHS, Khesari	Hamdullah	Saleem Khan	NSR	9	B.A	-----	Sanad Yafta		15/02/1987	28/05/2012	28/05/2012	28/05/2012
73	GHS, No. 2 NSR Kalan	Muhammad Usman	Muhammad Hanif	NSR	9	M.A	-----	Sanad Yafta		12/03/1987	28/05/2012	28/05/2012	28/05/2012
74	GHS, Badrashi	Salman Khan	Atta Ullah Khan	NSR	9	B.A	2nd	Sanad Yafta		01/02/1988	28/05/2012	28/05/2012	28/05/2012
75	GHS, Dagi Banda	Jalal Hussain	Faqir Hussain	NSR	9	B.A	-----	Sanad Yafta		02/03/1988	28/05/2012	28/05/2012	28/05/2012
76	GHS, Jabba Khushk	Nadeem Khan	Ghani ur Rahman	NSR	9	M.A	2nd	Sanad Yafta	Islamiyat	30/03/1988	28/05/2012	28/05/2012	28/05/2012
77	GHS, No.2 NSR Cantt.	Saif Ali Shah	Nadar Shah	NSR	9	B.A	-----	Sanad Yafta			28/05/2012	28/05/2012	28/05/2012

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-33857
No. _____/Promotion to B-16/Estab
Dated Peshawar the 23/12/2013.

ADDG/SI
21/12/13



To
All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:- Working Papers for Departmental Promotion Committees for the Promotion of SCT/CT, SAT / AT, STI/TT, SDM / DM, PSHT/SPST/PST, S Qari/Qari to the post of SST Bio-Chem, SST Phy-Maths, STT (Genral BPS-16).

Memo:
I am directed to refer to the subject noted above and to state that meeting of Departmental Promotion Committee for Promotion to the of vacant posts SST Bio-Chem, SST Phy-Maths, STT (Genral BPS-16, in CMS/Middle /High and Higher Secondary Schools in Elementary and Secondary Education Department at District Level will be held on 10.01.2014

I am further directed to ask you to submit Working Papers for Departmental Promotion Committees for the Promotion of SCT/CT, SAT / AT, STI/TT, SDM / DM, PSHT/SPST/PST, S Qari/Qari to the post of SST Bio-Chem, SST Phy-Maths, STT (Genral BPS-16. on the format already submitted in separate file for each category upto 5th Jan, 2014 and the following documents are required to be attached with the Working Papers

1. Final Seniority List undisputed
2. Synopsis of last 5 years ACRs.
3. Last three years result.
4. Non involvement certificate.
5. Bio data on the format already submitted.
6. Last pay slip.
7. BA/BSC Degree
8. B.Ed/M.Ed

Dairy No. 1981 dt 15.2.2014
OIO The CEO (M) NSR

Note ACRs be kept ready and to be presented in the meeting of Departmental Promotion Committee.

3825-27

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

Endst: No. _____ / File No. 1 / Promotion B-15 to B-16: Dated Peshawar the 23/12/2013.

- Copy forwarded for information and necessary action to the: -
1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
 2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 3. M/File

Dy: Director (Estab)
Elementary and Secondary Education

7

Annex "C"



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/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, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-2S/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A. Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

1A Director Physical Education (BPS-17)

At least second class Master's Degree in Physical Education from a recognized University.

27-35 years

(c) fifty percent by initial recruitment

(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:

Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;

Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and

(b) fifty percent by initial recruitment"; and

9

namely:

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion, then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

(3) ✓

Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

- (c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

- (d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

(11)

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion, then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

✓(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari, and Qari and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

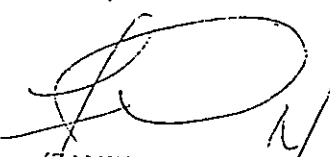
			<p>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</p> <p>(ii) twenty Five percent by initial recruitment.</p> <p>Note:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</p>
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(12)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa, Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.
22. Master file


(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)