

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 1420/2023


Muhammad Anwar Khan, SPET (BPS-16) Lakki Marwat ..... Appellant

VERSUS

Government of, Khyber Pakhtunkhwa through the Chief Secretary E&SE  
Department & others..... Respondents

INDEX

S/#	Description of document	Annexure	Pages No.
1	Joint Para Wise Comments along with affidavit		1-4
2	Copies of the Notification dated 13-11-2012, 24-07-2014 & 26-04-2018	A, B & C	5-15
3	Copy of the Notification dated 05-04-2022 & 27-05-2022	D & E	16-22
4	Authority letter		23

  
Assistant Director (Lit: II)  
E&SE Khyber Pakhtunkhwa,  
Peshawar

①

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 1420/2023**

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**VERSUS**

Government of, Khyber Pakhtunkhwa through the Chief Secretary E&SE  
Department & others.....Respondents

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-3.**

Respectfully Sheweth,

**Khyber Pakhtunkhwa  
Service Tribunal**

**PRELIMINARY OBJECTIONS.**

Entry No. 8817

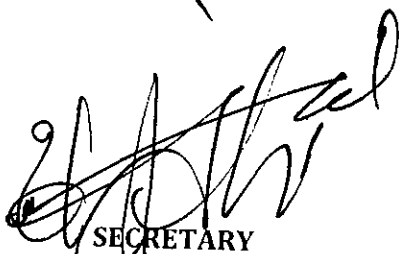
5-14-23  
~~Filed to file instant~~

- 1 That the Appellant has got no cause of action/locus standi to file instant appeal.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 That the appellant has concealed material facts from the ambit of this Honorable Tribunal.
- 4 That the appellant has not come to this Honorable Tribunal with clean hands.
- 5 That the appeal in hand is based on mala fide intentions for gaining illegal service benefits from the Department for her promotion against the Instructor Physical Education (IPE) in BPS-17 in violation of the Rules & policy in vogue.
- 6 That the appeal in hand is barred by law and limitation.
- 7 That the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties.
- 8 That aggrieved from the Notification dated 05-04-2022, the appellant has filed a time bared Departmental appeal to the Respondent Department which was seen & filed on the grounds of limitation as well as violative of the Law & Rules.
- 9 That the appellant is not entitled for anti dation of promotion to the post of IPE in BPS-17 under the relevant provision of (APT) Rules, 1989 in the Respondent Department.
- 10 That the appellant has not the prescribed qualification of B.Ed mandatory for promotion to the post of IPE (BPS 17) in the Respondent Department in view of the Service Rules dated 26-04-2018.

ON GROUNDS.

- A. Incorrect & not admitted. the appellant has been treated as per law & rules by the Respondent Department vide Notifications dated 05-04-2022 & 27-05-2022 by not promoting them to the post of IPE BS-17 under the Rules & policy in vogue.
- B. Incorrect & not admitted. The stand of the appellant is against the facts & legal proposition made by the Respondents in the fore going paras of the present reply which is according to the provisions of Articles 4 & 25 of the constitution of 1973, hence, the plea of liable to be rejected.
- C. Incorrect & not admitted. the appellant has been treated as per law & rules by the Respondent Department vide Notification dated 05-04-2022 by not promoting them to the post of IPE BS-17 under the Rules & policy in vogue.
- D. Incorrect & not admitted. The act of the Department is legal with no discrimination to words the appellant in the titled case & even according to the provision of sections 8 & 9 of the Civil Servant Act, 1973 & Rule-7 & 17 of Khyber Pakhtunkhwa APT Rules-1989
- E. Incorrect & not admitted. The Notification dated 05-04-2022 is according to the provision of Article 38(e) of the constitution of 1973 not applicable upon the case of the appellant under the rules, criteria policy in vogue.
- F. Incorrect & not admitted. The stand of the appellant is illegal as he is not entitled for promotion as IPE in BS-17 under the rules.
- G. Incorrect & not admitted. That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973, However, the Respondents also seek leave to this Learned Bench to submit additional grounds record & case law at the time on date of hearing.

Therefore, in view of the above made submissions, the appeal in hand may kindly be rejected in favor of the Department in the interest of justice.



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



DIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondents No: 2 & 3)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 1420/2023

Muhammad Anwar Khan, SPET (BPS-16) Lakki Marwat ..... Appellant

**VERSUS**

Government of, Khyber Pakhtunkhwa through the Chief Secretary E&SE  
Department & others..... Respondents

**AFFIDAVIT**

I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department Khyber  
Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant  
para wise Comments are true & correct to the best of my knowledge & belief. It is further  
stated on oath that in this appeal the answering Respondents have neither  
been placed Ex-Parte nor their defense has been struck off/cost.

*[Handwritten Signature]*  
Deponent

**ATTESTED**

*[Notary Seal: Notary Public, Peshawar, Khyber Pakhtunkhwa]*  
*[Handwritten Signature]*  
02-11-2023

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.**

**NOTIFICATION**

*Peshawar, dated the November 13, 2012.*



No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (1) 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.**

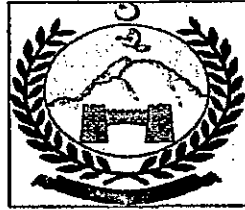
Indst. No. & Date as above.

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.

-SO-

7



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> July, 2014.

*[Handwritten signature]*

**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:

19" ~~20~~

**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 MA 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.  <b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.**

**NOTIFICATION**

*Peshawar, dated the November 13, 2012.*



No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa 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.**

Indst. No. & Date as above.

Copy forwarded to:-

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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.

OS-

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

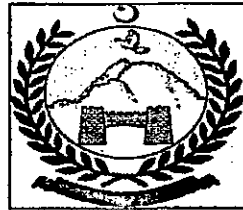
*[Handwritten Signature]*  
 Section Officer (Primary)

*[Handwritten Signature]*  
*[Handwritten Signature]*

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> July, 2014.

*Handwritten signature*

**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:

*Handwritten mark*

**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.  <b>Note:</b> If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

5

-30-

				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.	22-35 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

9

(ii) against Serial No. 1B, as so renumbered, 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), 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 style="text-align: center;"><b>and</b></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 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>

-31-

Handwritten signatures and initials in the right margin, including a large signature that appears to be 'S. S. S.' and other smaller initials.

10

-32-

			<p><i>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;</i></p> <p>(c) <i>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:</i></p> <p><i>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;</i></p> <p>(d) <i>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</i></p> <p style="text-align: right;"><i>No.3:</i></p>
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11

-33-

				<p>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;</p> <p>(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:</p> <p>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;</p> <p>(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:</p> <p>Provided that if no suitable candidate is available from amongst</p>
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(12)

-34-

			<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><b>Note:</b></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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(13)

**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

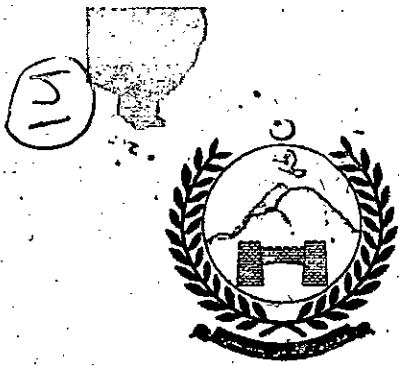
**Endst : of even No & date:**

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
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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

-35-



**(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)**



**GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.**

**NOTIFICATION**

Peshawar, Dated the 26.04.2018

**NOTIFICATION**

**No.SO(B&A)1-18/2018/DPE Service Rules:-** In pursuance of the provision 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 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, for Serial No. 1A, the following shall be substituted in respective columns, namely:

S.No.	Nomenclature of the post.	Minimum Qualification for appointment by initial recruitment or by transfer.	Age limit.	Method of recruitment.
1	2	3	4	5
"1A.	Instructor Physical Education (BPS-17)	(i). At least Second Class Master's Degree in Physical Education, with Bachelor of Education (B.ED) or equivalent qualification from a recognized university.  (ii). If no suitable candidate possessing the above qualification is available a candidate possessing Master's Degree in the Physical Education may be appointed as an Instructor Physical Education subject to the condition that he shall acquire the qualification of Bachelor of Education (B.ED) within three years from the date of his appointment, failing which his service shall be terminated without notice irrespective of any provision of the rules for the time being enforce.	22-35 years	(a) Seventy percent by Promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teacher BPS-16 with at least five years' service as Senior Physical Education Teacher (SPETs) and Physical Education Teacher (PETs) provided that if no suitable person is available from amongst Senior Physical Education Teacher (SPETs) for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst the Physical Education Teacher (PETs) with at least five years' service as such having qualification in column No.3.  Note: - if no suitable person is available for promotion then by initial recruitment; and  (b) Thirty percent by initial recruitment."

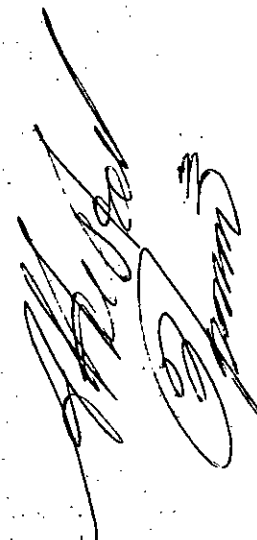


**SECRETARY TO  
GOVERNMENT OF KHYBER PAKHTUNKHWA,  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.**

**Endst. Of even Number & Date.**

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department.
4. The Secretary to Government of Khyber Pakhtunkhwa Public Service Commission.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Secretary, Social Sector FATA Secretariat, Warsak Road, Peshawar.
7. The Directors E&SE, PITE and DCTE Khyber Pakhtunkhwa.
8. The Director Education, FATA Warsak Road Peshawar.
9. The Director FMIU Finance Department.
10. Manager Government Printing Press, Khyber Pakhtunkhwa Peshawar with the request for publication in the next official Gazette.
11. Deputy Director (EMIS) E&SE Department.
12. All the DEOs (M/F) Khyber Pakhtunkhwa.
13. All the Agency Education Officers/ Agency Accounts Officers, FATA.
14. All District Accounts Officers Khyber Pakhtunkhwa.
15. The Section Officer (FR) Finance Department.
16. The Budget Officer-V and X, Finance Department.
17. Assistant Legal Drafter-IV, Govt: of Khyber Pakhtunkhwa Law Department.
18. Section Officer (R-I) Govt: of Khyber Pakhtunkhwa Establishment Department.
19. The Section Officers (S/M/F) E&SE Department.
20. The Section Officer (Primary) E&SE Department.
21. The Section Officer (Lit-I) E&SE Department.
22. The Section Officer (General) E&SE Department.
23. PS to Governor Khyber Pakhtunkhwa.
24. PS to Chief Minister Khyber Pakhtunkhwa.
25. PS to Chief Secretary Khyber Pakhtunkhwa.
26. PS to Minister Education Khyber Pakhtunkhwa.
27. PS to Secretary E&SE Department.
28. PS to Special Secretary E&SE Department.
29. Master File.



**(MURTAZA KHAN)  
SECTION OFFICER (BUDGET)**

-37-

12



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Dated Peshawar the, 05.04.2022

(H)  
"J"  
60-

**NOTIFICATION**

**No. SO (PE)2-6/DPC Meeting/Promotion of SPET(BS-16) to IPEs BS-17/2022: -** On the recommendations of the Departmental Promotion Committee made in its meeting held on 11.02.2022, the Competent Authority has been pleased to promote the following Seventy-Seven (77) Senior Physical Education Teachers' BPS-16 to the post of Instructor Physical Education BPS-17 (Male), on regular basis with immediate effect.

S. No.	Name & Designation	District
1.	Mr. Abdur Rafiq, SPET	DI Khan
2.	Mr. Aurangzeb, SPET	Charsadda
3.	Mr. Arzomand, SPET	Swat
4.	Mr. Hanifullah, SPET	Dir lower
5.	Mr. Aziz Ur Rehman, SPET	Swabi
6.	Mr. Khan Muhammad, SPET	Charsadda
7.	Mr. Sher Bahader Khan, SPET	Bannu
8.	Mr. Gul Zarif, SPET	Lakki Marwat
9.	Mr. Aslam Khan, SPET	Mardan
10.	Mr. Siar Muhammad, SPET	Charsadda
11.	Mr. Arshad Naz, SPET	Charsadda
12.	Mr. Attiq Ur Rehman, SPET	Mansehra
13.	Mr. Ishtiaq Ahmed, SPET	Haripur
14.	Mr. Rahim Dad, SPET	Haripur
15.	Muhammad Saleem, SPET	Haripur
16.	Mr. Saeed Ur Rahman, SPET	Dir upper
17.	Mr. Rashid Ullah, SPET	Swabi
18.	Mr. Altaf Hussain, SPET	Swabi
19.	Mr. Rashid, SPET	Haripur
20.	Mr. Raham Sher, SPET	Nowshera
21.	Mr. Nasir Khan, SPET	Charsadda
22.	Mr. Niaz Ali Khan, SPET	Nowshera
23.	Mr. Jamil Khan, SPET	Charsadda
24.	Mr. Abdul Hameed, SPET	Karak
25.	Mr. Said Hussain, SPET	Karak
26.	Mr. Khalid Jan, SPET	Charsadda
27.	Mr. Habib Ullah, SPET	Peshawar

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*[Handwritten signature]*  
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-61-

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
**Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar**

28.	Mr. Noor Rehman, SPET	Bannu
29.	Mr. Qaid Kamal, SPET	Mardan
30.	Mr. Khaista Rahman, SPET	Charsadda
31.	Mr. Lais Khan, SPET	Karak
32.	Mr. Paio Rehman, SPET	Karak
33.	Mr. Nabi Ur Rehman, SPET.	Karak
34.	Mr. Haider Muhammad, SPET	Karak
35.	Mr. Ahmad Gul, SPET	Karak
36.	Mr. Muhammad Nasir, SPET	Karak
37.	Mr. Wisal Muhammad, SPET	Swabi
38.	Mr. Intikhab Gul, SPET	Karak
39.	Mr. Kalim Nawaz, SPET.	Di khan
40.	M. Younas, SPET	Bannu
41.	M. Mustafa Shah, SPET	Bannu
42.	Muhammad Yousaf, SPET	DI khan
43.	Muhammad Khalid, SPET	Di khan
44.	Mr. Syed Mohsin Abbas, SPET	Di khan
45.	Mr. Akbar Khan, SPET	Lakki marwat
46.	Mr. Wahid Jamal, SPET	Swabi
47.	Mr. Falak Naz, SPET	Bannu
48.	Mr. Saif ur Rehman, SPET	Lakki Marwat
49.	Mr. Sher Muhammad, SPET	Dir lower
50.	Mr. Mumtazul Haq, SPET	Dir lower
51.	Mr. Aghzar Khan, SPET	Haripur
52.	Mr. Sarbali, SPET	Swat
53.	Mr. Mian Maz Ullah, SPET	Charsadda
54.	Mr. Sher Muhammad, SPET	Kohat
55.	Mr. Inayat Ullah, SPET	Karak
56.	Mr. Wasal Din, SPET	Buner
57.	Muhammad Ilyas, SPET	Abbottabad
58.	Mr. Manzoor Ahmad, SPET	Karak
59.	Mr. Muhammad Asif, SPET	Abbottabad
60.	Mr. Riaz Ahmad, SPET	Dir lower
61.	Mr. Shah Zamin, SPET	Charsadda
62.	Mr. Sadaqat Khan, SPET	Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

- 62 -

64.	Muhammad Farooq, SPET	Karak
65.	Mr. Tariq Shah, SPET	Haripur
66.	Mr. Nisar Hussain, SPET	Nowshera
67.	Mr. Alam Khan, SPET	Mardan
68.	Mr. Jehan Zeb, SPET	Swabi
69.	Mr. Khurshid Alam, SPET	Mardan
70.	Mr. Malak Taj, SPET	Mardan
71.	Mr. Amjad Ali, SPET	Mardan
72.	Mr. Naseer-Ud-Din, SPET	Nowshera
73.	Mr. Faqir Hussain, SPET	Charsadda
74.	Mr. Zafar Ullah, SPET	Nowshera
75.	Mr. Tehseen Ullah, SPET	Peshawar
76.	Mr. Inam Ullah, SPET	Charsadda
77.	Mr. Janas Khan, SPET	Peshawar

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Endst. No. & date as above.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
6. The Director ESRU, Khyber Pakhtunkhwa.
7. The Director Education (Newly Merged Districts), Warsak Road Peshawar.
8. The Deputy Director EMIS, E&SE Department, with the request to upload this Notification of E&SE Department website ([www.kpese.gov.pk](http://www.kpese.gov.pk)).
9. The Section Officers (Male/Female/General), E&SE Department, Peshawar.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PS to Secretary, E&SE Department.
13. PA to Additional Secretary (Estab), E&SE Department.
14. PA to Deputy Secretary (AB), E&SE Department.
15. Officers concerned.
16. Master File.

(MUHAMMAD ISHAQ) 5/4/22  
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the May 27, 2022

- 63 -

**NOTIFICATION**

**NO.SO(SME&SFD/5-17/2022/ Promotion of SPET (BS-16 to IPE BS-17).** Consequent upon their promotion to the post of Instructor Physical Education (BS-17) as notified vide this Notification No.SO(SP)2-6/DPC Meeting/Promotion of SPET (BS-16) to IPEs BS-17/2022 dated 05.04.2022, the following posting/transfers and adjustment are hereby ordered, in the best public interest, with immediate effect:-

S. #	Name Of Officer	Present Place Of Posting	Proposed Place of Posting	Remarks
1.	Abdur Rafiq	SPET (BS-16) GHSS Kot Jai D.I.Khan	IPE (BS-17) GHSS Kotli Saleh Khana Nowshera	A.V.P
2.	Aurangzeb	SPET (BS-16) GHSS Nisatta Charsadda	IPE (BS-17) GHSS Nizampur Nowshera	A.V.P
3.	Arzomand	SPET (BS-16) GHSS Balogram Swat	IPE (BS-17) GHSS Chitor Swat	A.V.P
4.	Hanif Ullah	SPET (BS-16) GHS Jawzo Dir Lower	IPE (BS-17) GHSS Qambat Dir Lower	A.V.P
5.	Aziz ur Rahman	SPET (BS-16) GHS No.2 Tordher Swabi	IPE (BS-17) GHSS Manji Swabi	A.V.P
6.	Khan Muhammad	SPET (BS-16) GHS Rajer No 1 Charsadda	IPE (BS-17) GHSS Naro Banda swabi	A.V.P
7.	Sher bahadar Khan	SPET (BS-16) GHS Bozakhel Bannu	IPE (BS-17) GHSS Shamoza Swat	A.V.P
8.	Gul Zarf	SPET (BS-16) GHS Matora Lakki Marwat	IPE (BS-17) GHSS Sadiqi Kot Spin Wam NWTD	A.V.P
9.	Aslam Khan	SPET (BS-16) GHS Pali Kalan Mardan	IPE (BS-17) GHSS Khair abad Mardan	A.V.P
10.	Siar Muhammed	SPET (BS-16) GHS Tangi Mardan	IPE (BS-17) GHSS Sajbin Swat	A.V.P
11.	Arshad Naz	SPET (BS-16) GHS Charsadda Khas	IPE (BS-17) GHSS Garyala Mardan	A.V.P
12.	Atiq ur Rahman	SPET (BS-16) GHS No. 2 Manshera	IPE (BS-17) GHSS Mohar Manshera	A.V.P
13.	Ishlaq Ahmad	SPET (BS-16) GHS Mang Haripur	IPE (BS-17) GHSS Chajian Haripur	A.V.P
14.	Rahim Dad	SPET (BS-16) GHS Noordi Haripur	IPE (BS-17) GHSS Jhamra Haripur	A.V.P
15.	Muhammad Saleem	SPET (BS-16) GHS Jatti pind Haripur	IPE (BS-17) GHSS Central Jail Haripur	A.V.P
16.	Saeed ur Rahman	SPET (BS-16) GHS Gul Mugam Dir Upper	IPE (BS-17) GHSS Akhagram Dir Upper	A.V.P
17.	Rashid Ullah	SPET (BS-16) GHSS Kot Jai D.I.Khan GHS No.1 Tordher Swabi	IPE (BS-17) GHS No.1 Tordher Swabi	Already occupied by him
18.	Altaf Hussain	SPET (BS-16) GHSS Kunda Swabi	IPE (BS-17) GHSS Kunda Swabi	Already occupied by him
19.	Rashid	SPET (BS-16) GHS Sarikot Haripur	IPE (BS-17) GHSS Sangar Manshera	A.V.P
20.	Raham Sher	SPET (BS-16) GHS Pashoon Gari Nowshara	IPE (BS-17) GHSS Ghazi Kot Buner	A.V.P
21.	Nasir Khan	SPET (BS-16) GHS Ambadher Charsadda	IPE (BS-17) GHSS Ambadher Charsadda	Already occupied by him
22.	Niaz Ali Khan	SPET (BS-16) GHSS Nanak Pura Nowshara	IPE (BS-17) GHSS Kotar Panar Nowshara	A.V.P
23.	Jameel Khan	SPET (BS-16) GHS Dalazak Charsadda	IPE (BS-17) GHSS Jalsai Swabi	A.V.P
24.	Abdul Hameed	SPET (BS-16) GHS Mandawa Karak	IPE (BS-17) GHSS Gaddar Mardan	A.V.P

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25	Said Hussain Khalid Jan	SPET (BS-16) GHSS Bahadar Khel Karak	IPE (BS-17) GHSS Gumbat Banda Dir Lower	A.V.P
26	Gabib Ullah	SPET (BS-16) GHSS No 2 Rajar Charsadda	IPE (BS-17) GHSS GHSS Garmunara Swabi	A.V.P
27		SPET (BS-16) GHSS No 03 Peshawar Cantt	SIPE (BS-18) GHSS Dag Peshawar	He will actualize his promotion against the vacant post of IPE (BS-17) GHSS Shalpin Swat. After actualization he is posted /adjusted against the vacant post of SIPE (BS-18) in OPS at GHSS Dag Peshawar
28	Noor Rehman	SPET (BS-16) GHS No.1 Bannu	SIPE (BS-18) GHSS Shahbaz Azmat Khel Bannu	He will actualize his promotion against the vacant post of IPE (BS-17) GHSS Bar shawar Swat. After actualization he is posted /adjusted against the vacant post of SIPE (BS-18) in OPS at GHSS Shahbaz Azmat Khel Bannu
29	Qaid Kamal	SPET (BS-16) GHS Saro Shah Mardan	IPE (BS-17) GHSS Khanjar Mardan	A.V.P
30	Khaista Rahman	SPET (BS-16) GHS Sherpao Charsadda	IPE (BS-17) GHSS Towda Cheena Dir Lower	A.V.P
31	Lais Khan	SPET (BS-16) GHS Takhl e Nasrati Karak	IPE (BS-17) GHSS Luqman Banda Dir Lower	A.V.P
32	Paio Rehman	SPET (BS-16) GHSS Karak	IPE (BS-17) GHSS Asbanar Dir Lower	A.V.P
33	Nabi ur Rahman	SPET (BS-16) GHS Ahmad Abad Karak	IPE (BS-17) GHSS Pingil Dir Lower	A.V.P
34	Haider Muhammad	SPET (BS-16) GHS Sarkl Lawagher Karak	IPE (BS-17) GHSS Gamseer Dir Upper	A.V.P
35	Ahmad Gul	SPET (BS-16) GHS Mir Banda Jerma Karak	IPE (BS-17) GHSS Spin Khak Nowshera	A.V.P
36	Muhammad Nasir	SPET (BS-16) GHS Darish Khel Karak	IPE (BS-17) GHSS Palo Dheri Mardan	A.V.P
37	Wisal Muhammad	SPET (BS-16) GHS Maneri Bala Swabi	IPE (BS-17) GHSS Chanai Swabi	A.V.P
38	Intikhab Gul	SPET (BS-16) GHS Rehmal Abad Karak	IPE (BS-17) GHSS Matta Swat	A.V.P
39	Kalim Nawaz	SPET (BS-16) GHSS Kech D.I.Khan	IPE (BS-17) GHSS Naway Kili Buner	A.V.P
40	Muhammad Younas	SPET (BS-16) GHS No.2 Bannu	IPE (BS-17) GHSS Utror Swat	A.V.P

64-

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65-

41.	M. Mustafa Shah	SPET (BS-16) GHSS Bannu	IPE (BS-17) GHSS Malkand Swat	AVP
42.	Muhammad Yousaf	SPET (BS-16) GHS Paroa D.I.Khan	IPE (BS-17) GHSS Lowarak Buner	AVP
43.	Muhamma Khalid	SPET (BS-16) GHSS No.1 D.I.Khan	IPE (BS-17) GHSS Dakara Buner	AVP
44.	Syed Mohsin Abbas	SPET (BS-16) GHSS Lar D.I.Khan	IPE (BS-17) GHSS Annawan Buner	AVP
45.	Akbar Khan	SPET (BS-16) GHSS Darra Pezo Lakki Marwat	IPE (BS-17) GHSS Karbhogha Sharda Hangu	AVP
46.	Wahid Jamal	SPET (BS-16) GHS Karnal Sher kali Swabi	IPE (BS-17) GHSS Daqai Swabi	AVP
47.	Falak Naz	SPET (BS-16) GCMS FOR Boys Bannu	IPE (BS-17) GHSS Shagal Swat	AVP
48.	Saif ur Rahman	SPET (BS-16) GHS Gandhi Khan Lakki Marwat	IPE (BS-17) GHSS Chamtali Swat	AVP
49.	Sher Muhammad	SPET (BS-16) GHSS Lal Qilla Dir Lower	IPE (BS-17) GHSS Dagh Maidan Dir Lower	AVP
50.	Mumtaz ul Haq	SPET (BS-16) GHS Spina Khawra Dir Lower	IPE (BS-17) GHSS Manogal Dir Lower	AVP
51.	Aghzar Khan	SPET (BS-16) GHS Rehana Haripur	IPE (BS-17) GHSS Ziarat Masoom Abbottabad	AVP
52.	Sarball	SPET (BS-16) GHSS Asala Swat	IPE (BS-17) GHSS Rahat Kot Swat	AVP
53.	Mian Maz ulah	SPET (BS-16) GHS Soor kamar Charsadda	IPE (BS-17) GHSS Hariyan Kot Malkand	AVP
54.	Sher Muhammad	SPST (BS-16) GHS.03 Kohat	IPE (BS-17) GHSS Maskini Dir Lower	AVP
55.	Inayat Ullah	SPET (BS-16) GHS Palosa Kamanari	IPE (BS-17) GHSS Asharay Buner	AVP
56.	Wasal Din	SPET (BS-16) GHS Budai Buner	IPE (BS-17) GHSS Chanar Buner	AVP
57.	Muhammad Ilyas	SPET (BS-16) GHS No.1 Abbottabad	IPE (BS-17) GHSS Budhla Abbottabad	AVP
58.	Manzoor Ahmad	SPET (BS-16) GHS Tappi Kohat	IPE (BS-17) GHSS Pindi Chena Khyber	AVP
59.	Muhammad Asif	SPET (BS-16) GHS No.3 Abbottabad	IPE (BS-17) GHSS No.3 Abbottabad	AVP
60.	Riaz Ahmad	SPET (BS-16) GHS Maidan Bandai Dir Lower	IPE (BS-17) GHSS Manial Dir Lower	AVP
61.	Shah zamir	SPET (BS-16) GHS Matla Charsadda	IPE (BS-17) GHSS Marhail Banda Nowsher	AVP
62.	Sadqat Khan	SPET (BS-16) GHS Civil Quarters Peshawar	IPE (BS-17) GHSS Gal Shawar Swat	AVP
63.	Sagheer Ahmad	SPET (BS-16) GHS Jhangl Abbottabad	IPE (BS-17) GHSS Chamialy Abbottabad	AVP
64.	Muhammad Farooq	SPET (BS-16) GHS Pershai Karak	IPE (BS-17) GHSS Simpora Swat	AVP
65.	Tariq Shah	SPET (BS-16) GHS K.T.S No.2 Haripur	IPE (BS-17) GHSS Karori Manshara	AVP
66.	Nisar Hussain	SPET (BS-16) GHS Ali Balg Nowshara	IPE (BS-17) GHSS Kalkot Dir Upper	AVP
67.	Alam Khan	SPET (BS-16) GHS Seri Behlol Mardan	IPE (BS-17) GHSS Miandam Swat	AVP
68.	Jehan Zeb	SPET (BS-16) GHSS Saleem Khan Swabi	IPE (BS-17) GHSS Nogram Buner	AVP
69.	Khurshid Alam	SPET (BS-16) GHS Takht Bhai Mardan	IPE (BS-17) GHSS Mian Kali Dir Lower	AVP
70.	Malak Taj	SPET (BS-16) GHSS Kot Jai D.I.Khan GHS Parkho Dheri Mardan	IPE (BS-17) GHSS Fatima Mardan	AVP
71.	Amjad Ali	SPET (BS-16) GHSS Chamtar Mardan	IPE (BS-17) GHSS Nehdam Dir Upper	AVP
72.	Naseer ud Din	SPET (BS-16) GHS Jarocba Nowshara	IPE (BS-17) GHSS Khairbad Dir Lower	AVP
73.	Faqir Hussain	SPET (BS-16) GHS Turangzai Charsadda	IPE (BS-17) GHSS Chuprial Swat	AVP
74.	Zafar Ullah	SPET (BS-16) GHSS Tani Jahha Nowshara	IPE (BS-17) GHSS Adamzai Nowshara	AVP

Handwritten signatures and stamps are present at the bottom of the page, including a large signature and a circular stamp.

75.	Tehseen Ullah	SPET (BS-16) GHS Jogi Wara Peshawar	IPE (BS-17) GHSS Haryan Bala Peshawar	A.V.P
76.	Inam Ullah	SPET (BS-16) GHS Manakrao Peshawar	IPE (BS-17) GHSS Kalam Swal	A.V.P
77.	Janis Khan	SPET (BS-16) GCMHS No.04 Peshawar Cantt	IPE (BS-17) GHSS Barawal Swal	A.V.P
<b>CONSEQUENTIAL TRANSFER/ADJUSTMENT</b>				
78.	Wasim Shahzad	IPE (BS-) GHSS Rehanpur Dir Lower	SIPE (BS-18) GHSS Salima Sikandar Khel Bala Bannu in (OPS)	A.V.P

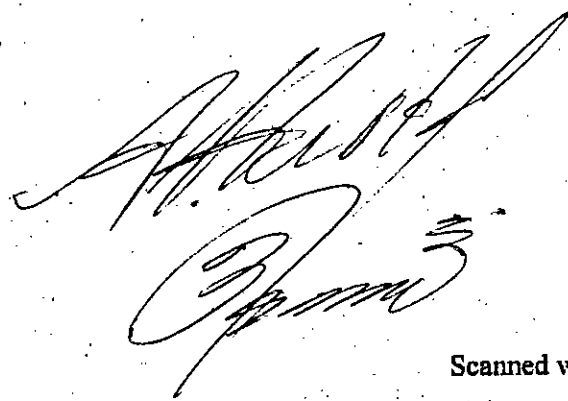
- 66 -

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Copy forwarded to the:**

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, DPD Khyber Pakhtunkhwa.
4. Director, DCTE Abbottabad.
5. District Education Officer (Male), Concerned.
6. District Accounts Officer, Concerned.
7. PS to Minister E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. PA to Additional Secretary (Estab) E&SE Department.
10. Director, EMIS E&SE Department.
11. Officers concerned.

(NAVEED ULLAH SHAH)  
SECTION OFFICER (SCHOOLS MALE)

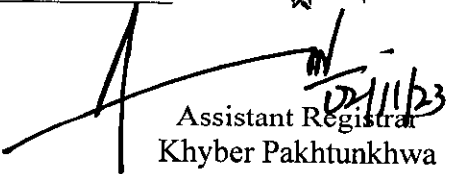




Cost of Rs. 2000/- received in Service Appeal No. 1420/2023

Titled Muhammad Anwar Khan vs. Education Deptt.

in the office of Assistant Registrar, Vide Order 30 Oct Dated: 08/11/2023.

  
Assistant Registrar  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar