

31.05.2016

Counsel for the appellant, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) alongwith Mr. Usman Ghani, Senior Government Pleader for respondents present. Re-arguments heard and record perused.

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

ANNOUNCED
31.05.2016


MEMBER

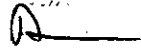

MEMBER

03.12.2015

Appellant in person and Mr. Hameed-ur-Rehman, ADO

~~along with~~ Mr. Muhammad Jan, GP for respondents present.

Written reply submitted copy of which is placed on file. To come up for rejoinder and arguments on 10-5-2016.


Member


Member

10.5.2016

Counsel for the appellant and Mr. Usman Ghani, Sr. GP for respondents present. Arguments in similar nature of appeals have already been heard and fixed for order on 31.5.2016, therefore, the same may also be clubbed with the said appeals for order on 31.5.2016.

Member


Member

29.1.2014

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

READER

27-3-14

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

READER

27-5-14

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

READER

27-8-14

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

READER

25-11-14

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

READER

4-2-15

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

READER

23-4-15

Vide order sheet dated 29.1.2014 in connected appeal No.
631/2013, this appeal is adjourned to 19-10-15.

READER

Vide order sheet dated 29.1.2014 in connected appeal No.

631/2013, this appeal is adjourned to 3-12-15.

READER

Appeal No. 639/2013.
Mr. Tehsin Ullah

27.08.2013

Appellant with counsel present and heard on preliminary.

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

Member.

3.12.2013

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

MEMBER

3.6.2013

Munshi to Counsel for the appellant present.

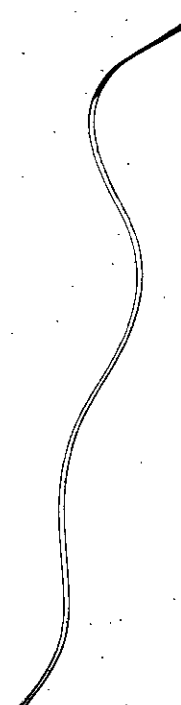
In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 19.6.2013.


Reader

19.6.2013

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




Reader



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 639/2013

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

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

Service Appeal No. 639/2013

Tehsinulah.....Appellant

V E R S U S


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

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Memo of Appeal		1-8
2.	Affidavit		9
3.	Addresses of the Parties		10
4.	Copy of the Notification issued by the Government	A	11
5.	Copies of service book and Notification dated 13/11/2012	B&C	12-38
6.	Copy of representation	D	39-42
7.	Wakalat Nama		43


Appellant

Through


Shams-ul-Hadi

Advocate High Court,
Peshawar.

Office: 2nd Floor, Bangush
Plaza Khyber Super Market,
Peshawar Cantt.

Cell No. 0313-9772262

①

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

Service Appeal No. 639 /2013

Tehsinulah PST

GPS Village Tasha Cheena, Tehsil Daggar, District
Buner.....Appellant

V E R S U S

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

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICE TRIBUNAL ACT
1974 TO THE EFFECT THAT THE NEWLY
INDUCTED CONDITION OF FA/FSC FOR
THE PROMOTION TO BPS-14/15 OF THE
PST TEACHER MAY PLEASE BE SET-ASIDE
AND THE PROMOTION MAY PLEASE BE
GRANTED ON SENIORITY-CUM-FITNESS
BASIS PURELY.**

PRAYER IN APPEAL:

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

Respectfully Sheweth:

1. That the appellant is belonging to the Education Department, all serving on the posts as mentioned against his name in the heading of the appeal.

2. That the appellant has got at his credit on the above said post a long tenure of service extending over 20 to 40 years.

3. That previously the basic qualification for the appointment at the post of PST was fixed as Matric Certificate along with the PST Certificate from a recognized Institution and the appellant appointed on the above said post having the said qualification as was the requirement at the time of the appointment of the appellant.

4. That the basic qualification for the post of PST was duly enhanced with basic qualification from Matric to F.A/ F.Sc in the year 2011 and many other colleagues of the appellants were then appointed on the same posts of PST having their qualification as F.A/ F.Sc alongwith the PST Certificate.

3

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

"Primary School Head Teacher (PSHT) (BPS-15)

By promotion, on the basis of seniority-cum-fitness from amongst senior primary school teachers with at least 10 years service and having qualification prescribed for initial recruitment of primary school teacher.

Primary School Teacher BPS-14

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

(4)

8. That thereby all the fresh appointed F.A/ PST have been given the BPS-12, whereas the holders of F.A. Certificate with 10 years length of service may be upgraded/ promoted to BPS-15 and the FSTs with the F.A. qualification having 05 years service may be upgraded to BPS-14. (Copies of service book and Notification dated 13/11/2012 is attached herewith as annexure "B" & "C").
9. That the appellant alongwith his other hundreds of the colleagues having their services extending from 20 to 40 years have been totally ignored and have not been given any chance of upgradation/ promotion throughout their professional career inspite of having such a long spotless tenure of service.
10. That this attitude of the respondent department to give benefit to the PST teachers with the F.A/F.Sc qualification over the teachers with the Matric qualification has been formulated without any cogent/ legal grounds but just to give benefit to the blue eyed teachers of the respondent department, whom have been appointed in their tenure.
11. That the appellant is also equally entitled to be upgraded on the basis of his tenure of service and be given the

(5)

same benefit as it has been given to the other PSTs teachers having the F.A. Certificates, as the higher qualification of F.A. can not be any means made the basis for giving any sort of above said benefit to the teachers.

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

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

GROUND:

A. That act of the respondent department, thereby depriving the appellant from the above said benefit of upgradation is illegal, unlawful, without authority/ jurisdiction, as well as being based on the malafide intentions of the respondent department is liable to be set aside.

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

6

deprived of the above said benefit mere on the ground that they are not having the qualification of F.A/F.Sc is an act unjust and without any reasonable ground, as the basic qualification at the time of the appointment of the appellant was Matric with PST and the basic qualification at the time of the appointment of the benefited teachers were F.A/F.Sc with PST, hence no privilege can be granted to the persons, whom have been appointed on the prescribed qualification.

C. That the appellant has been serving on the above said since long, whereas the minimum tenure of the service amongst the appellant is 18 years and the maximum tenure amongst the appellant is extended to 40 years and since long the appellant has been waiting for his turn to be promoted/ upgraded to some higher scale, however after having a tenure of such a long legitimate expectations the appellant has been treated unlawfully without any cogent/ solid grounds.

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

upgradation/ promotion has always been made on the basis of seniority-cum-fitness and have never at the basis of higher qualification whatsoever it may be. Furthermore still it is not the higher qualification for the teachers whom have been going thorough get benefit for the above said notification, but with the passage of time as the basic qualification has been raised, hence they have been appointed on the basis of F.A/F.Sc Certificate, which said factor cannot be made a ground for their upgradation to BPS-14/15.

- E. That the said act of the respondent department is not merely illegal as well as unlawful, but is also against the very clear Articles of Constitution of Islamic Republic of Pakistan as engraved in the basic rights of said constitution.
- F. That the appellant has got every right to be treated equally with his other colleagues and closing all the ways of upgradation/ promotion for the appellant is against all the norms of justice as it has been done in the above mentioned notification dated 13/11/2012.
- G. That it will be pertinent to bring into the notice of this Hon'ble Tribunal that the above said benefit has also been extended to the Clerk's community, whereby the

(8)

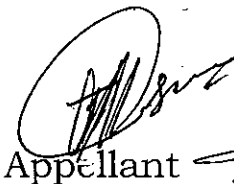
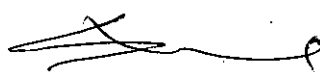
clerk's even with the Martric Certificate have been upgraded from BPS-09 to BPS-16 and similarly according to other notification dated 24th April, 2012 the Federal Government has been pleased to upgrade the PST Teachers from BPS-09 to BPS-14 including the Matriculate Teachers.

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

“having qualification prescribed for initial recruitment of primary school teachers”

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

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


Appellant 

Through

Shams-ul-Hadi
Advocate High Court,
Peshawar.

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

Service Appeal No. _____/2013

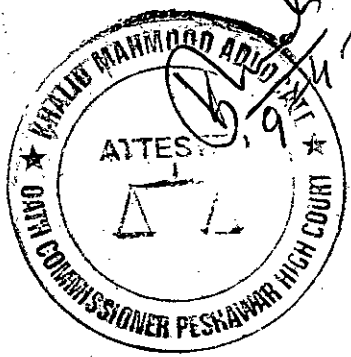
Tehsinulah.....Appellant

V E R S U S

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

AFFIDAVIT

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



[Handwritten Signature]

ADVOCATE

(10)

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

Service Appeal No. _____/2013

Tehsinulah.....Appellant

V E R S U S

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

ADDRESSES OF THE PARTIES

APPELLANT:

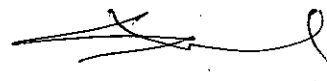
Tehsinulah PST
GPS Village Tasha Cheena, Tehsil Daggar, District Buner

RESPONDENTS:

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

Appellant

Through



Shams-ul-Hadi
Advocate High Court,
Peshawar.

Annex 'A'

(11)

8.	SST/SST Teacher/Agri with requisite experience ranging Sr. SST/Sr. SST Teacher/Sr. SST Agri BPS-16	with M.A./M.Sc at least 2 nd Division with B.Ed. M.Ed/M.A. Education equivalent qualification	17
9.	DPE BPS-16	M.Sc. at least 2 nd division in (HPE)	17

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

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

Section Officer (FR)

Endst of even No. & date.

Copy for information & necessary action to:-

1. Accountant General NWFP.
2. Director Schools & Literacy NWFP, Peshawar.
3. Director of Education FATA NWFP, Peshawar.
4. PSO to Chief Minister NWFP.
5. PSO to Chief Secretary NWFP.
6. PS to Secretary Finance Department NWFP.
7. All District/agency Accounts Officers in NWFP.

Attest
SHEIK
ADG

copy
AMMAD

ADG COURT PARK

Handwritten signature

Better Copy

(17)

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

To

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

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

Sir,

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

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

Official Signature
ATTESTED
10/10/07

Annex B (12)

(For use in Police Department only)

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. _____ dated _____ received back _____

Left thumb-impression. _____

Qualification	Date	Qualifications	Date
English	Passed S.S.C. Examination Under Roll No. 5543	First Arts	
Pashtu	held in March 1980 in Grade C	B. L. or B. A.	
Urdu	Securing 60 marks	Pleadership examination	
Plan-drawing	85%	Training School Final examination	
Finger print		Other qualifications	
Drill instructing	A Daggar Swat Distt.		
Court duties	passed p.c. examination Roll No 1594 from Education		
Reserve	Result declared on 1/8/88		
Sub Divisional Edu. Officer (M) Daggar, Swat Distt.			

N. B. - A line to be drawn under the qualification possessed.

ATTESTED

13

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

- 1. Name *Tahsimullah*
- 2. Race *Afghan*
- 3. Residence *Village Sura P.O. Navagai Distt Swat Tehsil Daggar*
- 4. Father's name and residence: *Han-dillah Village Sura P.O. Navagai Tehsil Daggar Distt Sw*
- 5. Date of birth by Christian era as nearly as can be ascertained *6-2-1962 Sixth February N.H. & Sixty-Two*
- 6. Exact height by measurement *5-7 Five feet seven inches*
- 7. Personal marks for identification *A black mole over the right*
- 8. Left hand thumb and finger impression of (non-gazetted) officer



9. Signature of Government servant *Tahsimullah*

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

Sub Divisional Edu. Officer (M)
Daggar Swat Distt.

[Signature]
ATTESTED
[Signature]

Date

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment or (ii) whether deputation counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
P.T.C G.P.S Lalso	Sub/Per	B.P.S No 7 (560-23-1020)	Rs 560 PM fixed			12/9/83	[Signature]
P.T.C G.P.S Ambela	do	B.P.S No 7 750-31-1370	Rs 560 PM fixed			29/10/1984	[Signature]
do	do		750/- Fixed			1/2/87	[Signature]
do	do		750/-			1/8/88	[Signature]
do	do		781/-			1/12/88	[Signature]
Office of the Accounts Officer N.W.F.P., Peshawar.		Pay fixed in the Revised Basic Pay Scales 1987, of Rs 750/- (S.O. 3) at Rs 750/- (S.O. 11) 1/1/1987 With Next Increment on 1/12/1987		Accounts Officer N.W.F.P.		Service Verified - 1/12/88 to 30/11/88 from acq. Roll & Record kept in this office.	
		Sub Divisional Edu. Officer (M) Daggar Swat Dist.					
do	do		812/-			1/12/89	[Signature]
P.T.C G.P.S Sura	do		812/-			6/3/90	[Signature]
do	do		8431/-			1/12/90	[Signature]
do	do	B.P.S No. 7 (1:95-60-1825)	1335/-			1/6/91	[Signature]
do	do		1395/-			1/12/91	[Signature]

Signature of Head of the office
Signature of other attending officer in absence of column 8

Signature of Sub Divisional Edu. Officer (M) Daggar Swat Dist.

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

S.D.E.O. (M) Daggar

AI [Signature] ED

107

10	11	12	13		14	15
			Period	Government to which debitable		

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 3	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office on other attesting officer.	Remarks at/duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
Divisional Edu. Officer (M) Daggar Swat Distt.	28/10/1984	Transferred vide memo no 1934-2133 P.T.C-4	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	31/7/88	scale revised PTC	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	30/11/88	Annul Ltr	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	30/11/89	A/O	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	6/3/90	Transfer	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	4/11/90	A/O	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	31/5/91	Scale Revised	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	30/11/91	A/O	S.D.E.O. (M) Daggar.				
S.D.E.O. (M) Daggar.	30/11/92	A/O	S.D.E.O. (M) Daggar.				

Appointed as untrained teacher at G.P.S Laloo vide D.E.O. SWAT no 3700-14/A-58 dated 3-9-1983

Transferred to R.P.S. Ambar vide 1934-2133 dated 28-10-1984

Attended Re-orientation Course held w.e.f 7-9-85 at GEC, Thana.

Service Verified w.e.f. 1-12-88 to 30-11-89 from Acq. Roll & Record kept in this office.

Sub Divisional Edu. Officer (M) Daggar Swat Distt.

Service Verified w.e.f. 1-12-83 to 31-3-87 from Acq. Roll & other records kept in this office.

Sub Divisional Edu. Officer (M) Daggar Swat Distt.

Fixation on 1-7-87

pay on 30-6-87 in exBPS = 56%
No. of increments earned = Nil
pay fixed on 1-7-87 = 75%

Sub Divisional Edu. Officer (M) Daggar Swat Distt.

Service Verified w.e.f. 1-4-82 to 31-12-87 from acq. Roll & Record kept in this office.

Sub Divisional Edu. Officer (M) Daggar Swat Distt.

Service verified w.e.f. 1-12-87 to 30-11-1988.

Sub Divisional Edu. Officer (M) Daggar Swat Distt.

Name of post	Whether substantive or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. 1956	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
DTC GPS Sura	5/1/92	BPS no. 2-192-60-192	1455/-	/	1 1/2	92	<i>[Signature]</i>
Do Officer of the Accounts General N.W.F.P. Peshawar Pay fixed in the Revised Pay Scale 1991 Rs. 1095-60-1995 (37) Rs. 1335/- N.W.F.P. 1-12-1991 With next increment on 1-12-1991.	Do	RS.	1515/-	/	1 1/2	93	<i>[Signature]</i>
Do	Do	BPS 7	2047/-	/	1 6/94	94	<i>[Signature]</i>
Do	Do		2128/-	/	1 12/94	94	<i>[Signature]</i>
-Do	Do		2209/-	/	1 12/95	95	<i>[Signature]</i>
-Do	Do	Officer of the Accounts General N.W.F.P. Peshawar Pay fixed in the revised basic pay scales 1994 of Rs. 1482-81-2175 (37) Rs. 2047/- N.W.F.P. 1-6-1994 With next increment on 1-12-1994	2290/-	/	1 12/96	96	<i>[Signature]</i>
Do	Do		2371/-	/	1 12/97	97	<i>[Signature]</i>

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

S. D. O. (M) Daggan Bunk

10

10	11	12	13	14	15
Date of termination of appointment	Reason of sanction (prob on promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Allocation of period of leave on average pay for four months which leave is debit to another Government servant	Signature of the head of the office or other attesting officer	Reference to any recorded particulars or course of reward or punishment of the Government servant
30/11/93	A/one	S.D.E.O. (M) Daggar Buner	pay fixation in R.P.S. No. 7 (109560-1995) w.e.f. 1-6-91		
31/5/94	scale revised	S.D.E.O. (M) Daggar Buner	pay in 31-5-91 in existing scale		
Service Verified w.e.f. 1-12-93 to 30-11-94 from acc. Roll & other Record of this Office.			pay fixed in M.P.S. No. of stay in M.P.S. 3	843/- 878/-	
Sub Divnl: Edu. Officer (M) Daggar Buner. 0			pay fixed in R.P.S. = 1335/- w.e.f. 1-6-91		
30/11/94	A/one	S.D.E.O. (M) Daggar Buner			Sub Divnl: Edu. Officer (M) Daggar Buner.
30/11/95	A/one	S.D.E.O. (M) Daggar Buner			Service Verified w.e.f. 1-12-90 to 30-11-91 from acc. Roll & Record kept in this office.
30/11/96	A/one	S.D.E.O. (M) Daggar Buner			Sub Divnl: Edu. Officer (M) Daggar Swat Dist. A
30/11/97	A/one	S.D.E.O. (M) Daggar Buner			Service Verified w.e.f. 1-12-91 to 30-11-92 from acc. Roll & Record kept in this office.
Service Verified w.e.f. 1-12-94 to 30-11-95 from acc. Roll & other Record of this office.			pay fixation in R. Revised BPS No. 7 (1180-97-2695) w.e.f. 1-6-94		
Sub Divnl: Edu. Officer (M) Daggar Swat Dist.			pay in existing BPS No. 7 on 31.5.94 @ 35%	1515/- 530/25	
Service Verified w.e.f. 1-12-94 to 30-11-95 from acc. Roll & other Record of this office.			pay fixation in R. Revised BPS No. 7 with acc. increment on 1-12-94	Total 2045/25 on 1/6/94 = 2047/-	
Sub Divnl: Edu. Officer (M) Daggar Buner. 0					
30/11/98	A/one	S.D.E.O. (M) Daggar Buner			

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Act. 3VI C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature as Government Servant	9 Remarks
PTC LPS Sura MO I			BPS No 7 - 1480 - 81 - 2695			12/98	[Signature]	illbl.
- DO -	Sub per		Rs. 2452/-			12/98	[Signature]	illbl.
- DO -	DO		Rs. 2533/-			12/99	[Signature]	illch
- DO -	DO		Rs. 2514/-			12/2000	[Signature]	illch
- DO -	DO	Remiss - BPS No 7 - 2220 - 120 - 5820	Rs. 2695/-			12/2001	[Signature]	illbl.
- DO -	DO		Rs. 4020/-			12/2001	[Signature]	illbl.
- DO -	DO		Rs. 4140/-			12/2002	[Signature]	illbl.
DO	DO		B. 7 - 1480 - 81 - 2695			12/2000	[Signature]	illbl.
DO	DO		2614/-			12/2000	[Signature]	illbl.
DO	DO		B-102 1660 - 167 - 3265			30-5/2001	[Signature]	illbl.
DO	DO		2730/-			12/2001	[Signature]	illbl.
DO	DO		2837/-			12/2001	[Signature]	illbl.
DO	DO		B-102 2190 - 160 - 2290			12/2001	[Signature]	illbl.
DO	DO		4250/-			12/2001	[Signature]	illbl.
DO	DO		4410/-			12/2002	[Signature]	illbl.
DO	DO		Rs. 4570/-			12/2003	[Signature]	illbl.
DO	DO		Rs. 4730/-			12/2004	[Signature]	illbl.

ATTESTED

4488

1	2	3	4	5	6	7
Signature and designation of the officer or other attending officer in attendance at cessation of service	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attending officer	Reason and duration of leave taken	Days allowed on average pay upto three months or 90 days (as applicable to another Government)	Signature of the head of the office or other attending officer
Signature of the head of the office or other attending officer	30/11/99	Al/jnc	S.D.E.O. (M) Daggar Buner		pay fixation in the revised BPS No 7	
Signature of the head of the office or other attending officer	30/11/2001	Al/jnc	S.D.E.O. (M) Daggar Buner		pay in the existing BPS No 7 Rs. 2695;	
Signature of the head of the office or other attending officer	30/11/2001	Al/jnc	S.D.E.O. (M) Daggar Buner		pay fixed in the revised BPS No 7 Rs. 40.	
Signature of the head of the office or other attending officer	1-12-2001	Scale revised	S.D.E.O. (M) PRY Distt. Buner		Service Verified w.e.f. 1-12-95 to 30-11-2001 from sq: Roll & other Record of this Office.	
Signature of the head of the office or other attending officer	30/11/2002	Al/jnc	S.D.E.O. (M) PRY Distt. Buner		Dy: Secy: Officer (M) PRY: Secy: Buner	
Signature of the head of the office or other attending officer	31/3/2003	Awarded 5/8 grade	S.D.E.O. (M) PRY Distt. Buner		Service Verified w.e.f. 1-12-95 to 31-12-2002 from sq: Roll & other Record of this Office.	
Signature of the head of the office or other attending officer	29/5/2001	Awarded 8/grade	Dy: DO (M) PRY Education Buner		Dy: Secy: Officer (M) PRY: Secy: Buner	
Signature of the head of the office or other attending officer	30/11/2001	Al/jnc	Dy: DO (M) PRY Education Buner		Awarded 5/8 grade w.e.f. 30-5-2001.	
Signature of the head of the office or other attending officer	1-12-2001	Scale revised	Dy: DO (M) PRY Education Buner		B-10/L1650-107-3265) at S No 5	
Signature of the head of the office or other attending officer	30/11/2002	Al/jnc	Dy: DO (M) PRY Education Buner		No 4414-5089 / dated 31/7	
Signature of the head of the office or other attending officer	30/11/03	Al/jnc	Dy: DO (M) PRY Education Buner		UNDER TAKING	
Signature of the head of the office or other attending officer	30/11/04	Al/jnc	Dy: DO (M) PRY Education Buner		hereby give an under taking to the effect that if any overpayment is made to me as a result of incorrect award of 5/8 grade the same may be recovered from my pay/gratuity as may be fixed by Govt's Dept.	
Signature of the head of the office or other attending officer	30/6/05	Scale revised	Dy: DO (M) PRY Education Buner			

ATTESTED

Signature

EPS
CALA NIO I

Whether substitute has been appointed in case of absence of the holder of the post	Qualifying date of appointment or whether the holder is a holder of the post under Art. 371 B. 1. 7.	Pay is substantive post	Additional pay for officialing	Other allowance falling under the term 'Pay'	Date of appointment	Signature of Government Official
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EPF No = 1012865-185-8415

Existing pay on 30⁶/₀₅ Rs: 4730/-

Pay fixed on 1⁷/₀₅ Rs: 5455/-

Dy. D.O. (M)
Pry: Edu Buner.

Revised BPS No = 1012865-185-8415

- Do	Rs: 5455/-	1 ⁷ / ₀₅	
- Do	Rs: 5640/-	1 ¹² / ₀₅	
- Do	Rs: 5825/-	1 ¹² / ₀₆	

2005

OFFICE OF THE ACCOUNTANT GENERAL
FEDERAL GOVERNMENT OF PUNJAB
PAY FIXED IN THE REVISED BASIC
PAY SCALES
OF RS. 865-185-8415
AT RS. 5455/- W.A.E.H. 1-07-2005
WITH NEXT EFFECT FROM 1-12-2005

Principal Officer
Division of P.W.D. Peshawar

ATTESTED

to go with
by
Dy: D.O. (M)
Pry: Edu Buner.
Dy: D.O. (M)
Pry: Edu Buner.
Dy: D.O. (M)
Pry: Edu Buner.

5455/10

17

1	2	3	4	5	6	7
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Grade 30/200

Office of the
 Accounts Officer
 P. Peshawar
 2001
 2490
 P. M. W. R. 1-12-2001
 with next increment 1-12-2002

pay fixation w.r to w.o.f 30-5-2001
 B-10 1660 - 107 - 3265
 Existing pay B-7 on 29-5-2001 Rs 261
 pay fixed B-10 on 30-5-2001 Rs 262
 promotional increment Rs 10
 pay fixed B-10 on 30-5-2001 Rs 273
 with next annual inc on 1-12-2001

Dy: Dist: Officer (M)
Pry/Secy: Buner

Re-Fixation Revised B-10 w.o.f 1-12-2001
 B-10 2690 - 160 - 7290

Existing pay B-10 on 1-12-2001 Rs 283
 pay fixed Revised B-10 on 1-12-2001 Rs 425

Dy: Dist: Officer (M)
Pry/Secy: Buner

Dy: D.O. (M)
Pry: Ed: Buner

30/11
05

Alone Dy: D.O. (M)
Pry: Edu: Buner

Dy: D.O. (M)
Pry: Ed: Buner

30/11
06

Alone Dy: D.O. (M)
Pry: Edu: Buner

Dy: D.O. (M)
Pry: Ed: Buner

30/07
07

scale Dy: D.O. (M)
Pry: Edu: Buner

128/2006
 known of pay and allow
 31/2003
 7898 - 100
 due to...

Service Verified w.o.f 1-1-2002
 from acq: Buner
 & other records of this office

Service Verified w.o.f 1-12-2003
 from acq: Buner
 & other records of this office

Accounts Officer
P. Peshawar

ATC/100

7PS
Calc No

1	2	3	4	5	6	7
Name of person	Whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Act. XVI of 1947	Pay to substantive post.	Additional Dep for officiating	Other allowances falling under Act XVI	Date of appointment

Signature & Designation

Signature designation head of the other officer in act of column

Detail of Allowances Deductions

1000 - HRA	RS	859	G.P.F.	RS	280
1300 - M.A	RS	425	G.P.F. Adv	RS	500
1528 - U.A.A	RS	75	Ben.F	RS	35
1770 - S.A.A	RS	415	G. Ins	RS	44
1830 - S.R.A	RS	710	Emp. Edu F	RS	04
1831 - A.H.R	RS	710			
Total	RS	3194	Total	RS	863

BPS No = 10 (3295-215-9745)

Rs = 6735 / 2 = 1 7/27

Rs = 6950 / 2 = 1 12/27

ACCEPTED

Dr. D.O.
Pr. Edu: Bu

Dr. D.O.
Pr. Edu: Bu

Dr. -
Dr. -
5450 -
Dr. -

280	863
800	
35	
44	
04	
9745	
7	
107	
12	
07	

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	
				Period	Government to which transferable	
				<p>Awarded s/grade vide EDO S/L order No 1396-1588 dated 28/2/2006</p> <p>In Super session of this office Enrolment No. 4914-5089 dated 31/7/2003 on Senior list No 286 s. No 61.</p> <p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>		
<p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>				<p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>		<p>Arora J. P. & Allee</p> <p>web 1/6/201 to 31/7/03</p> <p>of s/grade to S 10</p> <p>01/11/2003</p>
<p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>				<p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>		<p>UPgraded to S 12</p> <p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>
				<p>Service Verified w/o 1-12-04 to 30-11-17 from acq. Roll & other Record of this office.</p> <p><i>[Signature]</i> By: D.O. (M) Pry: Edu: Buner.</p>		

7	8	9	10	11	12	13	14	15	
Date of appointment	Signature of Government Servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or award at present of the Government Servant.
							Period to which Government to which tentable		
60-11430		Kacir By: D.O. (M) Pry: Edu; Buner.	30/6/88	Seals Revised	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/07		Dy: J.O. (M) (E & S) Edu; Buner.							
12/08		Kacir ESD(M) PRY Dist: Buner	30/11/88	A/S	Kacir By: D.O. (M) Pry: Edu; Buner.				
12/08		Kacir Dy: D.O. (M) Pry: Edu; Buner.		Entry Revised W.e. 12-9-83	Kacir By: D.O. (M) Pry: Edu; Buner.				OPTION. As a result of up-gradation of BPS 12 to me w.e. 1/1/07 Finance Deptt; No. FD-10-22(86)-IV (A) Dated 23/7/88 opt for Re-Fixation of pay on 2/12/87 as per Rules vide Govt. of N.W.F.P Finance Deptt; No. FD (10) 1-1 (88) VI (A) Dated: 6/1/88.
12/83		Kacir By: D.O. (M) (E & S) Edu; Buner.	30/11/84	A/Im.	Kacir By: D.O. (M) (E & S) Edu; Buner.				Pay Fixation in BPS 10 - 1/12 Rs 6950/- Pay in Existing BPS 10 - 1/12 Rs 7010/- Pay Fixed in BPS No. 12 - 2/07 Rs 7010/-
12/84		Kacir Dy: D.O. (M) (E & S) Edu; Buner.	30/11/85	A/Im.	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/85		Kacir Dy: D.O. (M) (E & S) Edu; Buner.	30/11/86	A/Im.	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/86		Kacir Dy: D.O. (M) (E & S) Edu; Buner.	30/6/87	Seals Revised	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/87		Kacir By: D.O. (M) (E & S) Edu; Buner.	30/11/88	A/Im.	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/87		Kacir By: D.O. (M) (E & S) Edu; Buner.	30/11/88	A/Im.	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/88		Kacir By: D.O. (M) (E & S) Edu; Buner.	30/11/89	A/S	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/89		Kacir By: D.O. (M) (E & S) Edu; Buner.	1/12/90	A/S	Kacir By: D.O. (M) (E & S) Edu; Buner.				
12/90		Kacir By: D.O. (M) (E & S) Edu; Buner.	31/12/91	S/A	Kacir By: D.O. (M) (E & S) Edu; Buner.				

OPTION.
As a result of up-gradation of BPS 12 to me w.e. 1/1/07 Finance Deptt; No. FD-10-22(86)-IV (A) Dated 23/7/88 opt for Re-Fixation of pay on 2/12/87 as per Rules vide Govt. of N.W.F.P Finance Deptt; No. FD (10) 1-1 (88) VI (A) Dated: 6/1/88.
Sign: Of Govt; Servant
By: D.O. (M) Pry: Buner

Pay Fixation in BPS 10 - 1/12 Rs 6950/-
Pay in Existing BPS 10 - 1/12 Rs 7010/-
Pay Fixed in BPS No. 12 - 2/07 Rs 7010/-

F 1331
3708 Arre 7
d Adare w/b 11/14/07
31/7/08 due to upgradation

to BPS 12 level of pay
1-12-07

Service Verified w.e. 1-12-07
to 31-12-08 from app: Cell B
other Record of this office.
By: D.O. (M) Pry: Buner

Whether substantive or officiating and whether permanent or temporary	If officiating state, (i) substantive appointment, or (ii) whether service credit for pension under Art. 37, C. S. II.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature of Government servant
BPS No 72-1095-60-1995						
		1455/-			1/9/91	<i>[Signature]</i>
		1515/-			1/12/91	<i>[Signature]</i>
		1575/-			1/12/92	<i>[Signature]</i>
		1635/-			1/12/93	<i>[Signature]</i>
BPS No 72-1480-81-2095						
		2209/-			1/6/94	<i>[Signature]</i>
		2290/-			1/12/94	<i>[Signature]</i>
		2371/-			1/12/95	<i>[Signature]</i>
		2452/-			1/12/96	<i>[Signature]</i>
		2533/-			1/12/97	<i>[Signature]</i>
		2614/-			1/12/98	<i>[Signature]</i>
		2695/-			1/12/98	<i>[Signature]</i>
BPS No 8						
		2772/-			1/12/99	<i>[Signature]</i>
BPS No 102-1660-107-3265						
		2944/-			30/01	<i>[Signature]</i>

By: T. J. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;
 By: D. O. (E & S) Edu;


ATTESTED
 [Signature]

Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to a recorded copy of the order of the Government
					Allocation of period of leave on average of 30 days for 45 days leave salary as payable to another Government	Period Government to which debit		
<i>[Signature]</i>	Kaalia By: T. J. (M) (E & S) Edu; Buner.	30/11/91	A/A	Kaalia By: D.O. (E & S) Edu;				(Annual increments granted during untrained period vide govt of N...)
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/92	A/A	Kaalia By: D.O. (E & S) Edu;				reference Dept No: FDC(PRC)5-2/2002 dated 30/3/2009
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/93	A/A	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	31/5/94	Sole Res.	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/94	A/A	Kaalia By: D.O. (E & S) Edu;				9 Mr. Tahseen ulah PST do hereby undertaking is the effect that if any payment is made to me as a result of fixation of Annual increments during untrained period will be deducted from pay/pension/gratuity Etc.
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/95	A/A	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/96	A/A	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/97	A/A	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/98	A/A	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/99	A/A	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/00	M/S	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/01	S/Res.	Kaalia By: D.O. (E & S) Edu;				
<i>[Signature]</i>	Kaalia By: D.O. (M) (E & S) Edu; Buner	30/11/01	A/A	Kaalia By: D.O. (E & S) Edu;				

Signature of Govt.
[Signature]
By: D.O. (M)
(E & S) Edu; Buner.

ATTESTED

1 Name of post	2 Whether a regular office or official time and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. N.	4 Pay in monthly post	5 L.A. (L.A. No. for officiating)	6 O.D. (O.D. No. for officiating)	7 Date of appointment	8 Signature Government Agent
			3051/-			1/12	<i>[Signature]</i>
		BPS No. 10	2490-160-7190				
			4570/-			2/1	<i>[Signature]</i>
			4730/-			1/2	<i>[Signature]</i>
			4890/-			1/3	<i>[Signature]</i>
		BPS No. 10	5050/- 2865-185-8415			1/5	<i>[Signature]</i>
			5825/-			1/5	<i>[Signature]</i>
			6010/-			1/5.5	<i>[Signature]</i>
		BPS No. 10	6185/- 3-95-215-9745			1/6	<i>[Signature]</i>
			7165/-			1/7	<i>[Signature]</i>
		BPS No. 12	7380/- 3630-260-77430			1/7	<i>[Signature]</i>
		BPS No. 12	7530/- 4355-310-18655			2/7	<i>[Signature]</i>
			9005/-			1/8	<i>[Signature]</i>
			9315/-			1/8	<i>[Signature]</i>

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8

[Handwritten signatures and notations in the right margin, including "By: D.O. (E & S) Edu..." repeated multiple times.]

[Handwritten signature]
ATTESTED
[Handwritten text]

21

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay with four months for which leave salary is debitable to another Government	
				Period	Government to which debitable	
12/01	12/01	S/R	Dy: D.O. (M)	(E & S) Edu; Buner		
12/01	12/01	A/2	Dy: D.O. (M)	(E & S) Edu; Buner		
12/02	12/02	A/A	Dy: D.O. (M)	(E & S) Edu; Buner		
12/03	12/03	A/2	Dy: D.O. (M)	(E & S) Edu; Buner		
12/05	12/05	S/R	Dy: D.O. (M)	(E & S) Edu; Buner		
7/05	7/05	A/2	Dy: D.O. (M)	(E & S) Edu; Buner		
12/05	12/05	A/2	Dy: D.O. (M)	(E & S) Edu; Buner		
12/06	12/06	S/R	Dy: D.O. (M)	(E & S) Edu; Buner		
7/07	7/07	A/2	Dy: D.O. (M)	(E & S) Edu; Buner		
12/07	12/07	up grade	Dy: D.O. (M)	(E & S) Edu; Buner		
12/07	12/07	scale revised	Dy: D.O. (M)	(E & S) Edu; Buner		
7/08	7/08	30/11/08	Dy: Dist. Officer (M)	(E & S) Education Buner		
12/08	12/08		Dy: Dist. Officer (M)	(E & S) Education Buner		

T 96/15/10 Arrears of pay and allowances w.e.f. 1-4/09 to 30-9/09 due in Refixation of pay untraced period
Totals = 4092/- drawn

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22

OFFICE ORDER

APPOINTMENT.

The following appointments of PTC (Untrained) teachers are hereby ordered @ Rs. 560/- P.M. fixed plus usual allowances admissible to him under the rules against vacant PTC posts in the schools noted against each with effect from the date of their taking over charge in the interest of public service.

S.NO.	NAME & QUALIFICATION	PARENTAGE	RESIDENCE	NAME OF SCHOOL	MARKS
1.	Dost Mohd, Mat.	Taj Mohammad	Jabba (Amazai)	GPS. Charanar	V; Post.
2.	Zarshaid, Mat.	Dilawar Shah	Kaho Sar	GPS. Rahim Patay	-do-
3.	Rehul Amin, Mat.	Mohd Rmin	Dagai	GPS. Ilai	-do-
4.	Said Shah, Mat.	Gulab Shah	Khale Kalay	GPS. Lalo	-do-
5.	Tahsinullah, Mat. (On humanitarian ground)	Hamdullah	Sura	-do-	-do-
6.	Bakht Muner Shah, Mat.	Bakht Shah	Dewanababa	GPS. Charanar	-do-

CONDITIONS:-

1. Charge report should be submitted to all concerned.
2. NO TA/DA & transfer grant is allowed being first apptt: under the rules.
3. The appointment is purely temporary and subject to termination at any time without notice and assigning any reason. In case of resignation they should have to submit one month's prior notice to the Department or forfeit one month's pay to the Govt: in lieu thereof.
4. They should produce their Health and Age Certificate from surgeon concerned.
5. The Head of the Institution concerned is required to check the original certificates of the candidate concerned before handing over the charge.
6. The candidates are required to take over charge within 14 days failing which their appointment order will stand automatically cancelled.
7. The candidates not be handed over the charge if their age exceeds 28 years or below 18 years.

(HABIBUR RAHMAN)
DISTRICT EDUCATION OFFICER,
SWAT SAIDU SHARIF

OFFICE OF THE DISTRICT EDUCATION OFFICER SWAT SAIDU SHARIF.

Endst: NO. 3700-14/A-58

Dated 3-9-1983.

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

1. The Sub Divl: Education Officer, Daggar, Swat.
2. The Head Teachers concerned.
3. The candidates concerned, under registered cover.

ATTACHED

DISTRICT EDUCATION OFFICER,
SWAT SAIDU S. SHARIF

R. P. ZIR/**

Annex -

23

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

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

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

Encl. No. & Date as above.

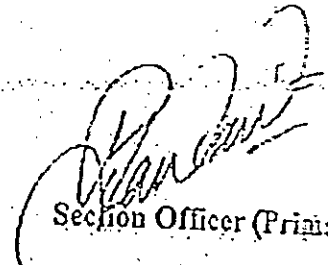
Copy forwarded to:-


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

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


Section Officer (Primary)


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APPENDIX

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


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

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

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

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

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

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

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

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

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

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SCHEDULE

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

Arabic Teacher

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

Theology Teacher

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

ATP/PHD

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Qari/Qaria

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

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

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

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = _____	
BA/BSc	Marks obtained X 20 / total marks = _____	
DM Certificate	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = _____	
BA/BSc	Marks obtained X 20 / total marks = _____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = _____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = _____	
MPhil/PhD	Marks = 05	

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities group at Intermediate Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = _____	5 Extra marks for F.Sc. 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection.
HSSC	Marks obtained X 10 / total marks = _____	
BA/BSc	Marks obtained X 25 / total marks = _____	
PST Certificate/ Diploma in Education / A.D.E.	Marks obtained X 20 / total marks = _____	
MA/M.Sc/M.Ed / MA Edu	Marks obtained X 20 / total marks = _____	
MPhil/PhD	Marks = 05	

Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.
2. The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/ forged/ bogus upon scrutiny/ verification, the service of the teacher concerned shall be terminated and the amount paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery/fraud under the relevant law.
4. Dent Asnad from recognized Tazemat-ul-Wafaqid Madaris, Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be.

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Annex (39)
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To

Secretary,
The Director Of Education (S
Peshawar, KPK

the respondents.....
.....

Departmental APPEAL AGAINST THE ORDER/
NOTIFICATION DATED 13.11.2012

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Respectfully Sheweth:

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

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

In column No.20 of notification held as under:..

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

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Column No.21 is reproduced as under:-

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- "i. Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or*
- ii. Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University."*

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

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

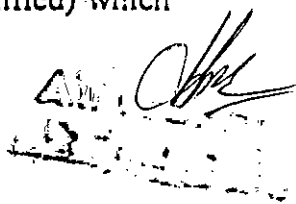
GROUNDS:

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


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- E) Because as per principles of Interpretation of statute, retrospective effect is not to be given to a statute unless it is specifically provided in clear words.
- F) Because as per column No.20, Senior Primary School Teacher (BPS-14) is by promotion on the basis of Seniority-cum-Fitness from amongst the Primary School Teachers, and column 19 of the notification prescribes that (PSHT) BPS-15 is by promotion on the basis of seniority-cum-fitness from amongst Senior Primary School Teacher (BPS-14) with at least 10 years service, and having qualification prescribed for initial recruitment of Primary School Teacher (BSP-12). The last condition needs harmonious interpretation of column No.21 (II) i.e. S.S.C or the initial recruitment qualification at the time of appointment of petitioners or the initial recruitment qualification of Primary School Teacher (BSP-12) needs to be deleted or declared ultra-vires as petitioners crossed Primary School Teacher (BPS-12), Senior Primary School Teacher (BPS-14) are practically working as Head of the Primary School i.e. Primary School Head Teacher (PSHT) BPS-15, thus the qualification of BPS-12 can't be trusted upon them or in other words when promotion is amongst Senior Primary School Teacher (BPS-14) then report to initial recruitment of Primary School Teacher (BPS-12) is not to be made or this reference means qualification which existed at the time of initial recruitment of petitioners i.e. 25/30 years back.
- G) Because as per General Clause Act/ Principles of interpretation of statute, these rules ought to be beneficially interpreted in favor of appellants.
- H) Because if education department succeeded in interpreting the rules with respect to initial qualification in present rules, the young/junior most F.A qualified Teachers are to be promoted as against appellants holding S.S.C + PTC qualification and senior most, equal to the age of Fathers of said F.A qualified Teachers, then appellants shall be made subordinate to his subordinate (F.A qualified) which



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

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

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

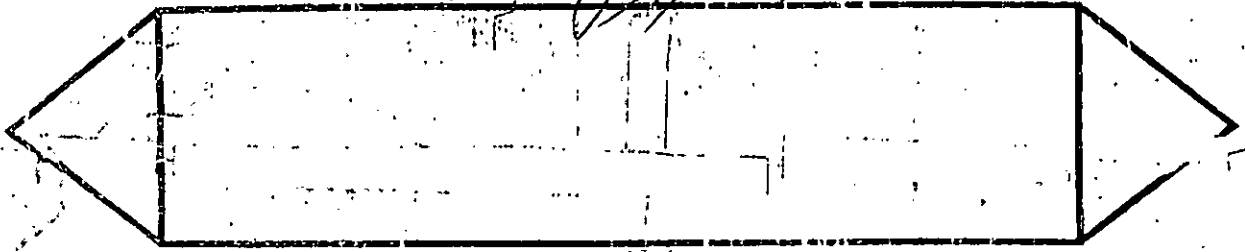
Any other relief deemed fit may also be graciously granted.

Date: 23.11.2012

- | | |
|----------------------|----------------------|
| ① Zor Bakht Shah | ⑪ Said Malik |
| ② Gul Ahmadi | ⑫ MST. Mihayat Bibi |
| ③ MST. Soriat | ⑬ MST. Yasmeen Begum |
| ④ Bakht Afzar | ⑭ Wahid Rasool |
| ⑤ Hidayat-ur-Rehman | ⑮ Tehsinullah |
| ⑥ Malak Zada | ⑯ Shah Roz Khan |
| ⑦ MST. Gul Hawa Bibi | ⑰ Misar Ahmadi |
| ⑧ MST. Shahnaz Bibi | ⑱ Ram Kishan |
| ⑨ Shams-ur-Hadi | ⑲ Jeet Kumar |
| ⑩ Amjad Ali | |

ATTESTED
AK

بعد الت سروس ٹریڈنگ



کتاب 20 بجائے
بنام اللہ تعالیٰ

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

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

کتاب 20 بجائے

المرقوم
ماہ 20

واہ

کے لئے منظور ہے۔

بمقام
M. S. S. S.
Samsat-Hadi