

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

CM Application No. _____ /2013 in Service Appeal No: 4800/2021

Amjid Ali, SCT GHSS Narsak MardanAppellant

VERSUS

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

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**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
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Amjid Ali, SCT GHSS Narsak MardanAppellant

VERSUS

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

APPLICATION FOR SUBMISSION OF WORKING PAPERS AND COPY OF THE MINUTES OF DPC IN COMPLIANCE OF THE ORDER DATED 02-10-2023 OF THIS HONORABLE TRIBUNAL & RELEASE OF SALARIES OF THE RESPONDENTS.

Respectfully Sheweth: -

The Respondents No. 1-3 submit as under: -

- 9232
20-11-2023
1. That the titled Service Appeal is pending adjudication before this Honorable Khyber Pakhtunkhwa Service Tribunal and is fixed for hearing on dated 24-01-2024.
 2. That vide order sheet dated 02-10-2023, this Honorable Tribunal has directed the Respondents for submission of DPC minutes held on 01-09-2021 in the Respondent Department, wherein, the appellant has been shown at S.No.4 with Seniority No. 81 in the final seniority list of SCT teachers in District Mardan with his qualification of B.Com/MA & M.Ed. with the remarks that the appellant was not considered for promotion to the post of SST (G) in BPS-16, being not eligible for having the Degree of B.Com, wherein, the appellant has not passed the mandatory subject i.e. English etc as prescribed by the promotion Rules notified vide Notification dated 13-11-2012 & this fact has been admitted by the appellant vide Paras-5 & 6 of the main appeal before this Honorable Tribunal. *(Copies of the promotion rules Notification dated 13-11-2012 and DPC minutes are attached as Annexure-A & B).*

Therefore, in view of the above made submissions it is humbly requested that this Honorable Tribunal may kindly be pleased to consider the titled application for submission of record in response to the order sheet dated 02-10-2023 on behalf of the Respondents No. 1-3 and release of monthly salaries of the respondent in the interest of justice please.

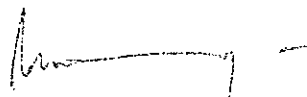

DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 1-3)

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

No.39(E&S)4-3/2012/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.

Endst. 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&S) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.

Attested


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) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3; (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3;

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				<p>(iv) one per cent from amongst the Instructional Material Specialists with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the 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 at 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 Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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	Senior Certified Teacher (Industrial Arts) (BPS-16).	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (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 Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimul 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 (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia 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

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		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		<p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years 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><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</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><i>Attested</i></p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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		any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).		promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
16.	Certified Teacher (Home Economics) (BPS-15).	(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 (ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or (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 (iv) Bachelor's Degree, from a recognized	18 to 35 years.	(a) Forty per cent by Initial recruitment; and (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics): 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

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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 Economics).</p> <p><u>Note:</u> 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.	13 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><u>Note:</u> 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; 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 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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SCHEDULE

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

Arabic Teacher

<u>Educational Qualification</u>	<u>Total Marks: 100</u>
SSC	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
M.A Arabic / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimiatul Wafaqul Madaris	Marks obtained X 20 / total marks = ____
Other MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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Theology Teacher

<u>Category of Qualification</u>	<u>Total Marks 100</u>
SSC	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 = ____
M.A Islamiat / Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimiatul Wafaqul Madaris	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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Qari/Qaria

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks = ____
Qirt Sanad from a recognized Institution.	Marks obtained X 20 / total marks = ____
HSSC	Marks obtained X 20 / total marks = ____
BA/BSc	Marks obtained X 20 / total marks = ____
MA/MSc/ M.Ed / MA Edu	Marks obtained X 15 / total marks = ____
MPhil/PhD	Marks = 05

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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 FSc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a condidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
CT Certificate/ Diploma in Education /ADE.	Marks obtained X 20 / total marks = ____	
MA/MSc/M. Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for FSc, 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 FSc, 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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8. 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(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. 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.

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Section Officer (Primary)



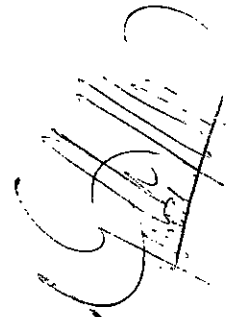
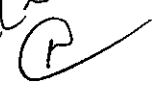
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Promotion of SST of District Mardan
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON
01-09-2021 AT 10:30 AM IN OFFICE OF THE DIRECTOR (E&SE) KHYBER PAKHTUN KHWA
PESHAWAR.

A meeting of the Departmental Promotion Committee was held on dated 01-09-2021 at 10:30 AM under the Chairmanship of Director Elementary & Secondary Education Khyber Pakhtunkhwa to discuss the promotion cases of SCT/CT, SDM/DM, SAT/AT, STT/TT, SQari/Qari, & PSHT/SPST/PST Male to the posts of SST (General), SST (Bio/Chem) & SST (Maths/Phy) of the Elementary & Secondary Education Department. The following attended the meeting:

1. **Dr. Hafiz Muhammad Ibrahim**
Director Elementary & Secondary
Education Khyber Pakhtunkhwa **In Chair**
2. **Deputy Secretary/SO(PE)**
Elementary & Secondary Education
Department Khyber Pakhtunkhwa Member
3. **Mr. Fazli Wahid**
Deputy Director Elementary &
Secondary Education Khyber
Pakhtunkhwa Member
4. **Dr. Muhammad Idrees**
District Education Officer
(Male) Mardan Member


Attested


The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were considered by the DPC and the decisions recorded are reflected against each item:

A. SST (General)

ITEM NO.1:- PROMOTION OF CT/ SCT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of CT/SCT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (G)	31
25% Initial Recruitment Quota	7.75
75% Promotion Quota	23.25
40% CT/SCT Promotion Quota to SST (G)	12
Proposed CT/SCT for Promotion to SST (G)	10
Deferred CT/SCT for Promotion to SST (G)	01

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	8	Imtiaz Hussain	GHS Labour colony	30/09/1963	29/11/1987	BA/CT/ B.ed	Deferred due to B.A from Al-Khair
2.	31	Muhammad Ilyas	GHS Ibrahim Khan Killi	15/09/1964	22/11/1992	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

Promotion of SST of District Mardan

3.	62	Ajmal Said	GHSS Palo Dheri	05/06/1972	12/08/1995	MA/M.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	81	Amjad ALI	GHSS Narshak	21/02/1971	01/01/1996	MA/M.ED	Not Considered for promotion to the post of SST (G) in BS-16, not eligible Being B.Com
5.	83	Iltaf Hussain	GHSS Parkho Dheri	03/02/1966	08/04/1996	BA/B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	85	Mumtaz Ali Khan	GHSS Narshak	10/05/1972	16/04/1996	MA/M.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
7.	90	Javid Iqbal	GHS Kass Koroon	14/08/1965	16/05/1996	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	91	Zardullah	GCMHS NO 3 Mardan	14/04/1969	16/05/1996	MA/M.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
9.	92	Dost Muhammad	GHSS Takkar	01/12/1964	23/05/1996	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
10.	93	Nafees Ahmad Khan	GCMHS NO 3 Mardan	10/12/1964	23/05/1996	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
11.	94	Zafar Iqbal	GHS No.2 Bicket Gunj	01/06/1969	25/05/1996	MA/M.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
12.	95	Riaz Ahmad	GCMHS Boys (No.2)	10/02/1971	25/05/1996	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of DM/SDM to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (G)	31
25% Initial Recruitment Quota	7.75
75% Promotion Quota	23.25
4% DM/SDM Promotion Quota to SST (G)	1.24
Proposed DM/SDM for Promotion to SST (G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
1.	23	Shahid Mehmood	GHSS Takar	01/04/1968	22/11/1992	MAM.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Mardan

2.	24	Zahid Islam	GHS Shamoza	02/05/1971	22/11/1992	BA	Not Considered for promotion to the post of SST (G) in BS-16, Being not eligible
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ITEM NO.3:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of AT/SAT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (G)	31
25% Initial Recruitment Quota	7.75
75% Promotion Quota	23.25
4% AT/SAT Promotion Quota to SST (G)	1.24
Proposed AT/SAT for Promotion to SST (G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	32	Abdul Haleem	GHS Khair Abad	10/04/1971	28/06/1997	BA/M.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.4:- PROMOTION OF TT/STT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of TT/STT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (G)	31
25% Initial Recruitment Quota	7.75
75% Promotion Quota	23.25
4% TT/STT Promotion Quota to SST (G)	1.24
Proposed TT/STT for Promotion to SST (G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	53-A	Hafiz Behram Ahmad	GSAAHSS No.1 Mardan	17/08/1971	11/02/1998	BA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.5:- PROMOTION OF Qari/S Qari TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of Qari/S Qari to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (G)	31
25% Initial Recruitment Quota	7.75
75% Promotion Quota	23.25
3% Qari/S.Qari Promotion Quota to SST (G)	0.93
Proposed Qari/S.Qari for promotion to SST(G)	0
Deferred Qari/S.Qari for promotion to SST(G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular Qari	Academic & Professional Qualification	DPC REMARKS RECOMMENDATION
1.	3	Muhammad Raza Shah	GHS Jehangir Abad	02/06/1964	08/11/1986	BA B.Ed.	Not Considered for promotion to the post of SST (G) in BS-16, not eligible Being BA from Alkhair and repeatedly ask and fail to submit verified degree.

Attested
RZ

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Promotion of SST of District Mardan

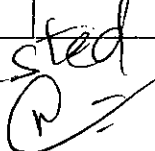
2.	4	Iftikhar Muhammad	GHS Babozai	10/12/1973	30/06/1997	BA B.Ed.	Not Considered for promotion to the post of SST (G) in BS-16, not eligible Being B.Ed from Alkhair and repeatedly ask and fail to submit verified degree.
3.	19	Iftikhar Muhammad	GHS Babozai	16/12/1973	30/06/1997	MA B.Ed.	Deferred due to B.Ed Degree from Alkhair

ITEM NO.6:- PROMOTION OF PST/PSHT/SPST TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of PST/PSHT/SPST to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (G)	31
25% Initial Recruitment Quota	7.75=8
75% Promotion Quota	23.25
20% PST/PSHT/SPST Promotion Quota to SST (G)	6.2
Proposed PST/PSHT/SPST for Promotion to SST (G)	5
Deferred PST/PSHT/SPST for Promotion to SST (G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	91	Liaqat Ali	GPS NO.2 FAZAL ABAD	15/03/1962	14/11/1982	BA,B.Ed	Deferred due to BA Degree from Alkhair
2.	131-A	Qaisar Shah	GPS NO.1 JANGI DHER	03/02/1964	12/09/1987	BA,B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	174	Muhammad Qamar Uz Zaman	GPS Barikab Rustam	15/09/1962	02/11/1983	BA,B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	331	Muhammad Iqbal Javid	GPS No.1. Cheraghdin	02/04/1968	25/11/1987	BA,B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	333	Iftikhar Ali	GPS Rasheed Abad	15/10/1968	08/12/1987	BA,B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	342	Sher Rahman	GPS Bakyana	01/01/1966	03/12/1990	BA,B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

Attested


Promotion of SST of District Mardan

B. SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF PST/SPST/PSHT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

The case of promotion of PST/SPST/PSHT to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (Bio/Chem)							3
25% Initial Recruitment Quota							0.75
75% Promotion Quota							2.25
20% PST/SPST/PSHT Promotion Quota to SST (G)							0.6
Proposed PST/SPST/PSHT for Promotion to SST (G)							1
S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	1692	SYED WAQAR AHMAD	GPS Saddudin Gumbat	01/04/1980	23/12/2006	B.Sc, B.ed	1st BA in 2001, 2nd B.Sc passed in 2021 from Sargoda Unv, not verified through DDO as per S/Book, no NOC for B.Sc. (Inquiry under process in his case in light of complaint filed by s.no 03.
2.	1834	SAJJAD AHMAD	GPS Shankar Mardan	05/12/1985	21/01/2010	B.Sc, B.ed	Inquiry under process in his case in light of complaint filed by s.no 03.
3.	1882	MEHBOOB QASIM	GPS Narshak	11/03/1983	22/01/2010	B.Sc, B.ed	Submitted a complaint against above 02 teachers regarding seniority and NOC case, inquiry is under process in cited case.

C. SST (Maths/Phy)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of CT/SCT to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No of Vacant post of SST (Maths/Phy)		5
25% Initial Recruitment Quota		1.25
75% Promotion Quota		3.75
40% CT/SCT Promotion Quota to SST (Maths/Phy)		2
Proposed CT/SCT for Promotion to SST (Maths/Phy)		2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	673	Gulab KHAN	GHS Sarband	18/02/1973	16/08/2016	MA/B.ED	Recommended subject to the outcomes of the HEC regarding additional subject.
2.	996	Hidayatullah	GHS Bakri Banda	01/01/1982	31/05/2014	B.Sc/B.Ed	Recommended subject to the outcomes of the HEC regarding additional subject.

ITEM NO.2:- PROMOTION OF PST/PSHT/SPST TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of PST/PSHT/SPST to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

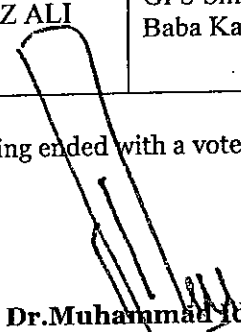
Total No of Vacant post of SST (Maths/Phy)		5
25% Initial Recruitment Quota		1.25
75% Promotion Quota		3.75
20% PST/PSHT/SPST Promotion Quota to SST (Maths/Phy)		1
Proposed PST/PSHT/SPST for Promotion to SST (Maths/Phy)		1


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Promotion of SST of District Mardan


No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	1500	IMTIAZ ALI	GPS Shikri Baba Katlang	06/04/1979	16/10/2004	B.Sc, B.ed	Considered suitable for promotion to the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

The meeting ended with a vote of thanks to and from the Chair.


Dr. Muhammad Idrees
District Education Officer
(Male) Mardan


Mr. Fazli Wahid
Deputy Director
Elementary & Secondary Education
Khyber Pakhtunkhwa


Deputy Secretary/SO(PE)
Elementary & Secondary
Education Department
Khyber Pakhtunkhwa


Dr. Hafiz Muhammad Ibrahim
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

Attested




**DIRECTORATE ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammad Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments, in Service Appeal No. 4800/2021 Titled Amjid Ali VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 20/11/2023

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

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

CM Application No. _____ /2013 in Service Appeal No: 4800/2021

Amjid Ali, SCT GHSS Narsak Mardan

.....Appellant

VERSUS

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

.....Respondents

AFFIDAVIT

I, *Bahramand Khan (Assistant Director) E&SE Department Khyber Pakhtunkhwa*, do hereby solemnly affirm & declare on oath that the contents of the instant application 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.

Deponent



CNIC No:

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030780443144

ATTESTED



20-11-2023