

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Service Appeal No.1551/2023


Seema Begum D/O Seraj Muhammad r/o Mohallah Moosa Khail Village  
Adina Tehsil Razzar District Swabi.. **Appellant**

**VERSUS**

1. Secretary E&SE Education Department, Khyber Pakhtunkhwa, Peshawar
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Swabi, District Swabi
4. Muhammad Ibrhaim S/O Said Kalam presently posted as Junior Clerk Government Girls High School (GGHS) Zaida District Swabi.
5. Bushra Begum D/O Noor Bahadar presently posted as Junior Clerk Government Girls High School (GGHS) Maneri Bala., District Swabi.
6. Nihaz D/O Bakht Shad presently posted as Junior Clerk Government Girls High School (GGHS) Zaida District Swabi.
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8. Asif Rahim S/O Abdur Rahim posted as Junior Clerk Government Girls High School (GGHS) Dodher District Swabi.
9. Amanullah S/O Chaman Khan presently posted as Junior Clerk Government Girls High School (GGHS) Dagai District Swabi. .... **Respondents**

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(Sofia Tabassum)  
DEO Female Swabi  
District Education Officer  
(Female) Swabi

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**PESHAWAR**

Service Appeal No.1551/2023

Seema Begum D/O Seraj Muhammad r/o Mohallah Moosa Khail Village  
Adina Tehsil Razzar District Swabi..

**Appellant** Khyber Pakhtunkhwa  
Service Tribunal

**VERSUS**

Diary No. 9589

Dated 29-11-2023

1. Secretary E&SE Education Department, Khyber Pakhtunkhwa, Peshawar
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Swabi, District Swabi
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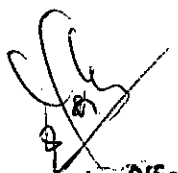
**Respondents**

**PARA WISE COMMENTS ON BEHALF OF THE RESPONDENTS**  
**No. 01 To 03.**

**Respectfully Sheweth,**

**PRELIMINARY OBJECTIONS.**

1. That the appellant desires to be promoted in violation of rules framed for promotion of Class-IV employees BPS-3 to 5 to the post of Junior Clerk BPS-11, which is illegal, unlawful, illogical, irrational, unjustified, unethical and immoral, hence the appeal is not maintainable.
2. That the appellant desires to be promoted on her own interpretation of law illegally and unlawfully, hence the appeal is not maintainable.
3. That admittedly, the appellant has desperately failed in the typing test which is necessary requirement for promotion as Junior Clerk, therefore, the appellant is not eligible according to the rules and policy as she has failed in typing test.
4. That the appellant herself refused intentionally one of the eligibility criteria of prescribed speed of typing, thus has violated the promotion rules framed for promotion of Class IV to the post of Junior clerk BPS-11, therefore, she cannot be considered for promotion for lacking the basic eligibility criteria, hence the appeal may be rejected/dismissed with special compensatory cost out right.

  
District Education Officer  
(Female) Swabi

5. That the appeal is wrong, baseless and not maintainable, it shows no strong cause to be taken for adjudication, therefore, the same appeal is liable to be rejected/ dismissed.
6. That the appeal is unjustifiable, baseless, false, frivolous and vexatious, hence the same is liable to be dismissed with the order of special compensatory cost in favour of respondents.
7. That no constitutional or legal right of the appellant has been violated, therefore, the appellant is not entitled to invoke the constitutional jurisdiction of this Honourable Court under Article 199 of the constitution of Pakistan, 1973.
8. That the appeal is wholly incompetent, misconceived and untenable.
9. That the appellant has no locus standi or cause of action to file the instant appeal.
10. That the appellant is completely estopped/ precluded by her own conduct to file this appeal.
11. That the appellant has not come to this Honourable Court with clean hands. The appeal also suffers from mis-statements and concealment of facts and as such the appellant is not entitled to equitable relief.
12. That the appellant has filed the instant appeal just to pressurize the respondents.


**Facts: -**

1. That the para relates to the permanent residence and status of the family of the appellant, which does not affect the final merit/seniority list of Class-IV and appointment/promotion against the junior clerk post of the appellant, hence needs no comments.
2. That admittedly, the appellant was appointed against the laboratory attendant post in Elementary & Secondary Education Department Khyber Pakhtunkhwa in District Swabi on 21/02/2004. Now she is working against laboratory attendant post at Government Girls High School (GGHS) Adina Swabi.
3. That it is mandatory for each and every government servant to perform his/her duties up to the entire satisfaction of his/her superiors because he/she is paid for his/her services from the national exchequer.
4. That the appellant misconceives the matter, for the purpose of creation of her right of appointment against the post of junior clerk BPS-II illegally, unlawfully and wrongly. The criteria for recruitment/promotion to the post of junior clerk, is secondary school certificate from a recognized Board and a speed of 30 words per

  
District Education Officer  
(Female) Swabi

minute in typing on the basis of seniority cum fitness from amongst the Class-IV. The memo of appeal, transpires that the appellant may be promoted without typing test only on the basis of Secondary School Certificate, which is clear violation of plethora judgments of this Honouable Peshawar High Court, Apex Court of Pakistan and Notification No. SO (PE)/4-10/SSRC/Ministerial staff/2013 dated the 28<sup>th</sup> January, 2013 with letter of the Directorate E&SE Khyber Pakhtunkhwa, Peshawar F.No. 535/A-23/MS/Apptt:J.Clerk/NTS.No.7276-7325, dated Peshawar the 17/08/2016, with further clarification of Government of Khyber Pakhtunkhwa E&SED, No. SO(PE) 9-15/Class-IV/17, dated Peshawar the 09/11/2017, Endst:No. 4070-4132 Directorate E&SE Khyber Pakhtunkhwa dated Peshawar the 21/11/2017 along-with Government of Khyber Pakhtunkhwa, establishment Department (Establishment wing) Notification No. SOE-IV(E&AD)/1-35/2014, dated Peshawar the 18<sup>th</sup> July 2019. Moreover, seniority list has already been prepared complete in all respect and displayed by the respondent No.03. The appellant participated in the typing test scheduled for promotion to the post of Junior Clerk but her performance was the poorest, her speed was 6 words per minute, therefore, could not make position amongst the Class IV, who were in the promotion zone to the post of Junior Clerk BPS-11 and this is why she was considered ineligible for such promotion. She was ineligible, therefore, could not appoint/promote. The documents which transpires that she has passed computer skill and participated other courses has no weight because she does not know a b c of computer skill. **Notification dated 28/01/2013, letter dated 17/08/2016, letter dated 09/11/2017 & Notification dated 18/07/2019 annexed as A, B, C, & D.**

5. That as per serial number 09 of Notification No.SO (PE)/4-10/SSRC/Ministerial Staff/2013, Peshawar dated 28/01/2013, the selection criteria for junior clerk is reproduced as," For junior clerk having at least second division in secondary school certificate or equivalent qualification from a recognized Board and a speed of twenty five words per minutes in typing," The said notification was amended by Government of Khyber Pakhtunkhwa Establishment Department, dated Peshawar the 18/07/2019, which is reproduced as," For junior clerk (i) FA/FSc with second division or equivalent qualification from a recognized Board and (ii) a speed of thirty (30) words per minute in typing," provided further that the condition of FA/FSc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this notification to the existing matriculate incumbents of the post of Class-IV for promotion to the post of junior clerk BS-11. Now in the light of notification dated 28/01/2013, with guidance letter dated 17/08/2016, 09/11/2017 and notification dated 18/01/2018, the criteria for promotion of Class-IV to the post of Junior Clerk B-11 till 17/07/2023 is as under, "**Secondary School Certificate or equivalent qualification from a recognized Board and a speed of thirty (30) words per minute in typing,**" Thus due to lack of speed of thirty (30) words per minute typing by the appellant, the Departmental Selection Committee rightly did

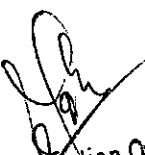
  
 District Education Officer  
 (Female) Swabi

not appoint her. The stance/plea of the appellant, "that there is no test in the rules and regulation," is quiet conjectural, contemptuous, frivolous, false, surmise, baseless, vexatious, illegal, unlawful, unethical, illogical, irrational, immoral and ludicrous, thus it is rejected outright. **Appointment order with DSC Minutes annexed as E.**

- 6. That the case of the appellant is based on complete misconception regarding the rules, therefore, after examining the rules, the eligibility criteria for promotion to post of junior clerk BPS-11 prescribes two qualifications (i) Secondary School Certificate or equivalent qualification from a recognized Board and (ii) a speed of thirty (30) words per minute in typing. Thus, where candidate has both these qualification, he/she can be held eligible for promotion to the post of Junior Clerk BPS-11, otherwise he/she can not be considered for promotion for lacking the basic eligibility criteria. Those candidates who were eligible for promotion that time, they were promoted accordingly. The appellant was not promoted due to lacking the basic eligibility criteria by her. It is settled by now that a candidate participated in the process of recruitment/promotion and failed to qualify the process cannot impugn the said process. Without fulfilment of the requirement of the qualification prescribed under rules for the post in question civil servants could not claim promotion on the basis of her experience as of right. Unless qualification held by civil servant was declared equivalent qualification for promotion, the civil servant could not, merely on the basis of her experience in the relevant subject claim promotion. Reliance is placed on 2006 SCMR 1427.
- 7. That the appellant misconceives the matter due to lacking the basic eligibility criteria the appellant could not be considered for the said promotion.
- 8. That the appellant case was based on complete misconception regarding the rules, therefore, after examining the rules, she cannot be considered for promotion for lacking the basic eligibility criteria. The stance/plea of the appellant is conjectural, contemptuous, frivolous, baseless, false, vexatious and ludicrous. The documents annexed as N at page 25 to 26 with memo of appeal and the appellant claims it as a departmental appeal is not a departmental appeal at all. It is rejected outright. Furthermore, the service appeal is badly barred by time and liable is to dismissed.
- 9. That the appellant was not eligible for promotion, therefore, she could not be promoted under the law & rules and therefore, she is not an aggrieved person at all. Moreover, she has no cause of action to file the instant appeal and the appeal in hand is liable to be dismissed on the above facts & circumstances.

**Grounds: -**


- A. Incorrect, hence denied. The conduct of respondents is in accordance with the provision of the constitution of the Islamic Republic of Pakistan, 1973, including Article 4 of the constitution which mandates that every Citizen is to be treated in accordance with law.

  
 District Education Officer  
 (Female) Swabi


This being the case, the appellant is not entitled to be promoted from the post of Class-IV to the post of junior clerk BPS-11.

- B. Incorrect, hence denied. That the act of the respondents is in accordance with law and the provision of law has been properly interpreted.
- C. Incorrect, hence denied. The action of the respondents is fair, transparent, and right, correct just and with application of mind to the facts and circumstances of the case, hence need the interference of this august court, to be kept intact and may be appreciated.
- D. Incorrect, hence denied. The action not considering the appellant's name by the respondents is right, correct, highly appreciable and tenable in the eye of law, rules and policy of the government of Khyber Pakhtunkhwa. The whole process has been performed with clean hands, without any prejudice, nepotism or like and dislike.
- E. Incorrect, hence denied. The appellant was equally treated by the respondents; the question of discrimination can not arise in any shape. Promoting nears and dears & approachable is just an accusation and to bring defame on the respondents. She lost her eligibility for the post due to not qualifying the mandatory typing test. No blue eyed has been benefited. No eligible person has been deprived. No violation of merit, criteria, rules, law, policy and principles have been made. The promotion was made in accordance with law, rules and policy. **The rules annexed as A, B, C & D** with this para-wise comments indicates/proves the action of the respondents as valid and authentic. These are sufficient to prove the stance/plea of the appellant false, baseless illegal and unlawful.
- F. That the respondents seek permission to raise/argue other points/grounds on the day of hearing the case.


In view of the above stated submissions. It is earnestly requested that the appeal in hand may very graciously be dismissed with special compensatory cost in favour of respondents.

  
 1. (Motasim Billah Shah)  
 Secretary E&SE KP Peshawar  
 Peshawar

**SECRETARY**  
 Elementary & Secondary Edu: Deptt:  
 Government of Khyber Pakhtunkhwa

  
 2. (Dr. Iqbal Khan)  
 Director E&SE KP  
 Peshawar  
**Director**

Elementary & Secondary Education  
 Khyber Pakhtunkhwa Peshawar

  
 3. (Sofia Tabassum)  
 DDEO Female Officer  
 (Female) Swabi

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9. Amanullah S/O Chaman Khan presently posted as Junior Clerk Government Girls High School (GGHS) Dagai District Swabi. ....

**Respondents**

**Affidavit**

**I Sofia Tabassum DEO Female Swabi do hereby solemnly affirm and declare on oath that the contents of the comments submitted by respondents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.**

**It is further, stated on oath that in this appeal the answering respondents have neither been placed ex-parte nor has their defense been struck off.**



*(Signature)*  
**(Sofia Tabassum)**  
**DEO Female Swabi**  
**District Education Officer**  
**(Female) Swabi**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
Peshawar, dated the 28<sup>th</sup> January, 2013

NOTIFICATION

No.SO(PE)/4-10/SSRC/Ministerial Staff/2013:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, and in supersession of all rules issued in this behalf to the extent of the Elementary and Secondary Education Department the (E&SE Department) in consultation with the Establishment Department and Finance Department hereby lays down the method of recruitment, qualifications and other conditions specified in Column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts borne on the ministerial establishment in the Elementary and Secondary Education Department specified in Column No.2 of the said Appendix.

APPENDIX

S. NO	NOMENCLATURE	MINIMUM QUALIFICATION AND EXPERIENCE FOR INITIAL APPOINTMENT OR BY TRANSFER	AGE LIMIT	METHOD OF RECRUITMENT (EXISTING)
1.	Deputy Director (Finance and Accounts) / Deputy Director (Administration) (BPS-18)		4	5 By promotion on the basis of seniority-cum-fitness from amongst the Assistant Directors (Finance and Accounts) & Assistant Directors (Administration) with at least five years service as such.
2.	Assistant Director (Finance and Accounts) / Assistant Director (Administration) (BPS-17)			By promotion on the basis of seniority cum fitness from amongst the Budget and Accounts Officers with at least two years service as such.
3.	Budget and Accounts Officer. (BPS-16)			By promotion on the basis of seniority cum fitness from amongst the Superintendents with at least two years service as such.
4.	Superintendent (BPS-16)			By promotion on the basis of seniority cum fitness amongst the holders of the posts of Assistants and Senior Scale Stenographers with at least five years service as such.
5.	Senior Scale	(i) At least Second Class Bachelor's Degree or equivalent	20 to 30	By promotion on the basis of seniority cum

27/1/13



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	Stenographers (BPS-16)	qualification from a recognized University; (ii) Speed of Seventy words per minute in shorthand in English and Forty Five words per minute in typing; and (iii) Knowledge of Computer in using MS words and MS Excel.	Years	fitness from amongst the Junior Scale Stenographers (BPS-14) with at least five years service as such.
6.	Assistant (BPS-14)	At least Second Class Bachelor's Degree from a recognized University	20 to 30 Years	(a) Seventy five per cent by promotion, on the basis of seniority-cum-fitness from amongst the Senior Clerks with at least five years service as such; and (b) Twenty five per cent by initial recruitment
7.	Junior Scale Stenographers (BPS-14)	(i) Intermediate or equivalent qualifications from a recognized Board; (ii) Speed of Fifty words per minute in shorthand in English and Thirty Five words per minute in typing; and (iii) Knowledge of Computer in using MS words and MS Excel.	18 to 30 Years	By Initial recruitment
8.	Senior Clerks (BPS-09)			By promotion on the basis of seniority cum fitness from amongst the Junior Clerks, Assistant Store Keepers and Laboratory Assistants with at least two years service as such.
9.	Junior Clerk/Assistant Store Keeper/ Laboratory Assistant (BPS-07)	(i) For Junior Clerk / Assistant Store Keepers having at least Second Division in Secondary School Certificate or equivalent qualifications from a recognized Board and a speed of twenty five words per minute in typing ; (ii) For Laboratory Assistants having at least Second Division in Secondary School Certificate or equivalent qualifications from a recognized Board with Science.	18 to 50 Years	(a) Thirty Three per cent by promotion, on the basis of seniority-cum-fitness from amongst the Daftaries, G/Operators, Qasids and Naib Qasids including other equivalent posts in the attached department /offices/institutions with at least Two years service as such and having qualification mentioned in column No. 9. (b) Sixty Seven per cent by initial recruitment Note: - For the purpose of promotion, there shall be maintained a joint seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc including other equivalent posts in the attached department /offices/institutions with reference to the dates of their regular appointment or acquiring Secondary School Certificate whichever is later.

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10.	Driver (BPS-04)	Having valid Driving License and preferably Literate.	18 to 32 Years	By Initial recruitment
11.	Naib Qasid /Chowkidar/ Behshti/Cook/Bearer/ Shop Attendant/ Laboratory Attendant etc	Preferably Literate	18 to 30 Years	By Initial recruitment

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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

*Alford*

*J*

*[Signature]*

20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.  
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.  
22. Master file

*Attested*  
*[Signature]*

*[Signature]*  
722013  
SECTION OFFICER (Primary)

*[Signature]*

*[Signature]*



GOVERNMENT OF N.W.F.P.  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(ESTABLISHMENT WING)

**NOTIFICATION**

Peshawar, dated the 04<sup>th</sup> February, 2009

NO. SOE-III(E&AD)1.8/2008 - In pursuance of the provisions contained in sub-rule (2) of Rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, hereby directs that in this Department's Notification No. SOR-(S&GAD)4-2/82, dated 8<sup>th</sup> June, 1988, the following further amendments shall be made, namely:

**AMENDMENTS**

In the Appendix, for the existing entries in columns No. 3, 4 and 5 against serial No. 7, the following shall be substituted in the respective columns, namely:

	3	4	5
(i)	Secondary School Certificate or equivalent qualification from a recognized Board; and	18-30 years	a) Thirty-three per cent by promotion from amongst Daftaries and Naib Qasids or other equivalent posts with two years service as such, who have passed Secondary School Certificate Examination; and b) Sixty-seven per cent by initial recruitment.
(ii)	A speed of 30 words per minute in typing.		

Note: For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Naib Qasids etc with reference to the dates of their acquiring Secondary School Certificate.

Provided that:

- (i) if two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials; and
- (ii) where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials.

*(Handwritten notes and signatures)*  
D.S.A.  
AS (E&AD)  
9/11

SECRETARY TO GOVERNMENT OF THE  
North-West Frontier Province  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT

District Education Officer  
(Female) Swabi



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GOVERNMENT OF N.W.F.P.  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(ESTABLISHMENT WING)

NOTIFICATION

Peshawar, dated the 04<sup>th</sup> February, 2009

NO. SOE-III(E&AD)1-3/2008. - In pursuance of the provisions contained in sub-rule (2) of Rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, hereby directs that in this Department's Notification No. SOR-I(S&GAD)4-2/82, dated 8<sup>th</sup> June, 1988, the following further amendments shall be made, namely:

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(ii)	A speed of 30 words per minute in typing.		

Note:- For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Naib Qasids etc with reference to the dates of their acquisition of Secondary School Certificate.

Provided that:

- (i) If two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials; and
- (ii) where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials.

SOCG

11/2/09

D.S.A

AS (E&A)

9/2

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Disty

SECRETARY TO GOVERNMENT OF THE  
North-West Frontier Province  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT

District Administration Officer  
District Swabi

FAIR COPY

(11)

GOVERNMENT OF N.W.F.P

ESTABLISHMENT & ADMINISTRATION

DEPARTMENT

(ESTABLISHMENT WING)

NOTIFICATION

Peshawar, dated the 04<sup>th</sup> February, 2009

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AMMENDMENTS

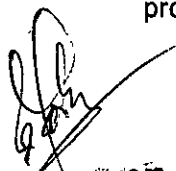
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(ii) A speed of 30 words per minute in typing.		b) Sixty-seven per cent by initial recruitment.

Note: - For the purpose of promotion, there shall be maintained a common seniority list of Daftaries and Naib Qasid etc with reference to the dates of their acquiring Secondary School Certificate.

Provided that:

- i. If two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials; and
- ii. Where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials.

  
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(Female) Swabi

SECRETARY TO GOVERNMENT OF THE  
North-West Frontier Province  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT

DIRECTORATE OF ELEMENTARY &amp; SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

F.No. 535/A-23/MS/ Apptt/J.Clerk/NTS.

No. 7276-7335

Dated Peshawar the 17/8/2016

To,

All the District Education Officers  
(Male & Female) in Khyber Pakhtunkhwa.Subject: - **GUIDANCE REQUIRED FOR THE APPOINTMENT OF JUNIOR CLERK.**

Memo,

I am directed to refer to the subject cited above and to state that cases are pouring in this Directorate from the various DEOs E&SE (Male & Female) seeking guidance as under: -

*"the candidates contested for the post of Junior Clerk through NTS having typing speed less than 25 words per minute are eligible for appointment as junior clerk or otherwise"*

In this connection all the DEOs (Male & Female) in Khyber Pakhtunkhwa are advised to follow the relevant recruitment rules for the post of junior clerk notified by the Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide Notification No. SO (PE) 4-10/SSRC/Ministerial Staff/2013 dated 28.01.2013 according to which the minimum prescribed qualification and experience for initial appointment against the post of junior clerk is reproduced below: -

*Selection criteria for J/c*

*"(i) For junior clerk/Assistant Store Keeper having at least Second Division in Secondary School Certificate or equivalent qualification from a recognized Board and a speed of twenty five words per minutes in typing.*

Hence, it is reiterated for the information and guidance of all the DEOs (Male & Female) to follow the above referred recruitment rules strictly.

*ans*  
17/8/16

Assistant Director (Admn)

E&amp;SE Khyber Pakhtunkhwa, Peshawar

Encl No \_\_\_\_\_

Copy forwarded for information to the:-

1. DEO (Female) Abbottabad w/r to her e-mail letter dated 4.8.2016.
2. DEO (Male) Peshawar w/r to his letter No. 5168 dated 15.8.2016.
3. DEO (Female) Mardan w/r to her letter No. Nil dated nil.
4. DEO (Male) Torghar w/r to his e-mail letter dated 11.8.2016.
5. Pto Director of E&SE, Khyber Pakhtunkhwa Peshawar.

Assistant Director (Admn)  
E&SE Khyber Pakhtunkhwa, Peshawar

Annexure - C (123)  
13

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
No. SO(PE)9-15/Class-IV/17  
Dated Peshawar the 09-11-2017

To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

DD (Admin)  
3/11/17  
10/11/17

Subject: -

CLARIFICATION REGARDING DETERMINATION OF ELIGIBILITY FOR PROMOTION OF CLASS-IV TO THE POST OF J/CLERK WITH TYPING SKILL KNOWLEDGE

Dear Sir

I am directed to refer to your letter No. 4591F.No.411/A-20/C-IV/Shangla-4 23 10/2017, on the subject noted above and to state that this department only amend/delete the condition of SSC 2<sup>nd</sup> division for promotion of Daftaries, G/Operators, Qasids and Naib Qasids to the post of Junior Clerk whereas the condition of typing speed of twenty five (25) words per minute may be considered as same as reflected in this department notification No. SO(PE)/4-10/SSRC/Ministerial Staff/2013 Dated 28/01/2013.

Yours Faithfully

ak

(NAIK MUHAMMAD)  
SECTION OFFICER (PRIMARY)

Endst: of even Number & Date:

Copy to:

1. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
2. PS to Special Secretary, Elementary & Secondary Education Department, Peshawar.
3. PA to Deputy Secretary (A/B), Elementary & Secondary Education Department, Peshawar.

ak

SECTION OFFICER (PRIMARY)

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Inest. No. 4070-4132 A.No. 411/A-20/C-IV/Shangla-4 Dated Peshawar the 21/11/2017.

Copy of the above is forwarded for information & compliance to the :-

1. All District Education Officers (Male/Female) in Khyber Pakhtunkhwa.
2. Section Officer (Primary) Govt of Khyber Pakhtunkhwa E&SE Department w/r to his letter No. and dated cited above.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

District Education Officer  
(Female) Swabi

ak

Assistant Director (Admin)

Directorate of Elementary & Secy Edu:  
Khyber Pakhtunkhwa Peshawar.



Annexure - 12  
(14)  
(13)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(ESTABLISHMENT WING)

Dated Peshawar, the 18<sup>th</sup> July, 2019

**NOTIFICATION**

**No.SOE.IV(E&AD)/1-35/2014:-** In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SOE.IV (E&AD)/1-35/2012 dated 6<sup>th</sup> December, 2012, the following amendments shall be made, namely:

**AMENDMENTS**

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

1. 4.	2. Junior Clerk.	3. (i) FA/ F.Sc with second division or equivalent qualification from a recognized Board; and  (ii) a speed of thirty (30) words per minute in typing.	4. 18 to 30 years.	5. (a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed FA/F.Sc Examination or its equivalent qualification from a recognized Board; and  (b) sixty per cent by initial recruitment.  <b>Note:</b> For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification:
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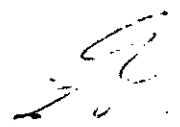
*[Handwritten signature and initials]*

(15) (14)

1.	2.	3.	4.	5. Provided that-  (i) if two or more officials have acquired the FA/F.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post;  (ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials:  Provided further that The condition of FA/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11)."
----	----	----	----	---

W

CHIEF SECRETARY  
KHYBER PAKHTUNKHWA



15  
16  
Enclst: No. SOE-IV(E&AD)/1-35/2014, dated 18<sup>th</sup> July, 2019

Copy forwarded for information and necessary action to: -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Senior Member of Board of Revenue.
3. The Principal Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary, Khyber Pakhtunkhwa Public Service Commission.
7. Deputy Director (IT), Establishment & Administration Department with the request to upload on the official website.
8. PS to Chief Secretary Khyber Pakhtunkhwa.
9. PS to Secretary Establishment Department,
10. PS to Special Secretary (Estt), Establishment Department.
11. PS to Special Secretary (Reg), Establishment Department.
12. PA to Addl. Secretary (Estt/ Reg), Establishment Department.
13. PA to Addl. Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar.
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette with the request to provide 50 copies of Gazette.

  
(HAZRAT JAMAL)  
SECTION OFFICER (E-IV)




Annexure - E

17/16

**DISTRICT EDUCATION OFFICE (FEMALE) SWABI**

(Office phone Fax No 0938-280339, emisfswabi@yahoo.com)

**PROMOTION ORDER**

Consequent upon the recommendation of Departmental Promotion Committee as contained in its minutes of the meeting, held on 09-03-2023, in the light of notification issued vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, the following C-IV are hereby promoted to the post of Junior Clerk BPS (18650-1310-57950) plus usual allowances under 33 % quota as admissible to them according to existing rules & policy and adjusted at the stations noted against their name with immediate effect.

S#	Name/CNIC No.	Father's Name	Previous School/Station	Name of school where adjusted	Remarks
1	Muhammad Ibrahim 16202-3437645-9	Said Kalam	GGHSS Shahmansoor	GGHS Zaida	AVP
2	Bushra Begum 16202-8227644-8	Noor Bahdar	GGHSS Pabaini	GGHS Maneri Bala	AVP
3	Nihaz 16201-5514856	Bakht Shad	GGHSS Lahor	GGHS M.Khel Zaida	AVP
4	Luqman Khan 16202-77922991	Habib Gul	GGPS No.1 Turlandi	GGHS Darra	AVP
5	Asif Rahim 16202-4279278-3	Abdur Rahim	GGHSS Shahmansoor	GGHS Dodher	AVP
6	Aman Ullah 16203-0356761-7	Chaman Khan	GGPS GadBano Banda	GGHS Dagai (G)	AVP

- Note:-
1. Necessary entry to this effect should be made in their Service Books.
  2. TA/DA is not allowed to anyone.
  3. They will be governed by such rules and regulations as may be issued from time to time by the Government.
  4. An undertaking may be obtained from the concerned, if any discrepancy was found in the award of J/Clerk post BPS-11 and over payment made to them will be recovered from their pay, gratuity and pension.
  5. Their degrees /certificates must be verified from the concerned Universities/Boards.

(SOFIA TABASSUM)  
DISTRICT EDUCATION OFFICER  
(FEMALE) SWABI

Endst.No. 737-743 /Dated Swabi the 10/03 /2023

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

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Swabi.
3. Principals/ Head Mistress concerned Schools.
4. ADEO (Estab:) Local Office.
5. EMIS Branch Local Office.
6. Officials concerned.

DY: DISTRICT EDUCATION OFFICER  
(FEMALE) SWABI



18

17

**DISTRICT EDUCATION OFFICE (FEMALE) SWABI**  
(Office phone Fax No 0938-280339, emisfswabi@yahoo.com)

**MINUTES OF THE DPC MEETING.**

A meeting of the Departmental Promotion Committee was held at 10:00 AM on 09-03-2023 in the office of the District Education Officer (Female) Swabi under Chairmanship of DEO (Female) Swabi for the promotion of C-IV to J/Clerk on seniority-cum-fitness.

**The following attended the meeting**

- |    |  |             |
|----|--|-------------|
| 1. | Miss. Sofia Tabassum DEO (Female) Swabi  | Chairperson |
| 2. | Representative of E & SE Directorate     | Member      |
| 3. | Miss Naila Naz DDEO (Female) Swabi       | Member      |
| 3. | Miss. Dilraj Begum SDEO (F) Lahor        | Member      |
| 3. | Miss. Humaira Nazneen ADO (F) Swabi      | Member      |
| 4. | Mr. Sabz Ali Superintendent Local office | Member      |

**Agenda Item.**

**Promotion of Class IV to Junior Clerk (Under 33 % quota)  
According to the existing rules & policy.**

The meeting started with recitation from the Holy Quran. The Chairperson welcomed to all the participants and gave proper permission to go ahead, according to which the following 06 Class IV case for promotion to the post of Junior Clerk under 33 % quota was placed before the committee for consideration on the basis of seniority com fitness & passing typing test in the light of existing rules and policy, notified vide No.SO(PE)/4-10/SSRC/Ministerial staff /2013dated 28.01.2013. which was approved by all the committee members unanimously after scrutiny and checking.

S#	S.List No.	Name & Desig:/ Father's Name	D/O 1 <sup>st</sup> Appointment as Class IV	Name of Station/Office	Remarks
1	332	Muhammad Ibrahim S/o Said Kalam	23.08.2013	GGHSS Shahmansoor	Recommended for promotion to J/Clerk
2	347	Bushra Begum D/o Noor Bahdar	24.05.2014	GGHSS Pabaini	Recommended for promotion to J/Clerk
3	383	Nihaz D/o Bakht Shad	29-06-2015	GGHSS Lahor	Recommended for promotion to J/Clerk

4	428	Luqman Khan S/o Habib Gul	16.09.2016	GGPS No.1 Turlandi	Recommended for promotion to J/Clerk
5	440	Asif Rahim S/o Abdur Rahim	29.03.2017	GGHSS Shamansoor	Recommended for promotion to J/Clerk
6	511	Aman Ullah S/o Chaman Khan	19.06.2019	GGPS Gadbano Banda	Recommended for promotion to J/Clerk

1. Miss. Sofia Tabassum DEO (Female) Swabi Chairperson
2. Miss. Naila Naz DDEO (Female) Swabi Member
3. Representative of E & SE Directorate Member
4. Miss. Dilraj Begum SDEO (F) Lahor Member
5. Miss. Humaira Nazneen ADEO (F) Swabi Member
6. Mr. Sabz Ali Khan Suprintendent Member
7. Mr. Adil Nawaz, Junior Clerk Member

Endst.No. 729-G /Dated Swabi the 09/03 /2023

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

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. All Committee Members.

DISTRICT EDUCATION OFFICER  
(FEMALE) SWABI

**TYPING TEST - PASSED**


User: Seema Begum 1620209335354  
 Test name: History of Photography  
 Date: 06/03/2023 11:59

**TEST RESULTS**

Duration:	2:00 min. of total 2:00 min.		
Gross speed:	9 wpm	Gross strokes:	98
Accuracy:	68%	Error hits:	30 (6 errors * 5)
Net speed:	6 wpm	Net strokes:	68

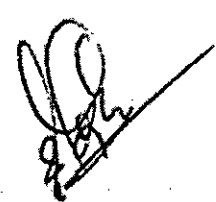
**TEST TEXT**

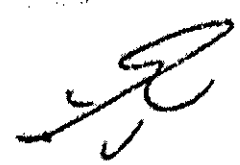
2> As in most cases \_ [of] great and valuable inventions [inventions] in  
 4> science and art; the English [English] lay \_ [claim] to The

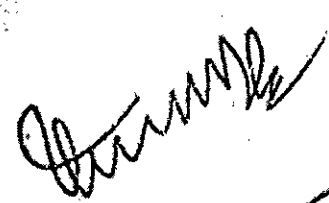
  
 District Education Officer  
 (Female) Srābhi

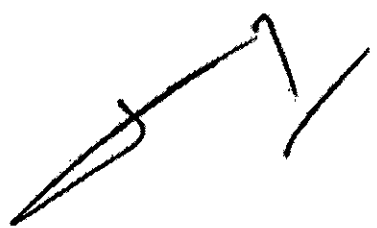
















**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No. \_\_\_\_\_ /F.No. /A-20/C-IV/DSC DPC/

Dated Peshawar the 07/03/2023

Phone: 091-9225344

Email: ddadm.ece@gmail.com

**NOTIFICATION**

Mr. Abdul Bari Superintendent (Admin) Local Directorate E&SE Peshawar is hereby nominated a representative for DPC Meeting regarding promotion Class-IV to Junior Clerks in the Office of DEO (F) Swabi, with reference to her letter No 659 dated 04/03/2023.

**Director**

Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 6273-75


Copy forwarded to the: -

1. Mr. Mr.Abdul Bari Superintendent (Admin) Local Directorate E&SE Peshawar
2. District Education Officer (Female) Swabi w/r her letter No.659 dated 04.3.2023
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. Master File.

  
Assistant Director (Admr.)

Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

7/3/23

  
District Education Officer  
(Female) Swabi



**JUDGMENT SHEET**  
**IN THE PESHAWAR HIGH COURT, D.I.KHAN BENCH**  
(Judicial Department)

W.P No. 1127-D/2017

**Farman Ullah**  
**Vs**  
**Government of Khyber Pakhtunkhwa through**  
**Chief Secretary, Peshawar and 04 others**

For petitioner      Muhammad Sajid Awan, Advocate  
For respondents    Mr. Kamran Hayat Miankhel Addl.  
                                 Advocate General  
                                 Mr. Umar Farooq Bhattani, Advocate  
Date of hearing     25.01.2021

**JUDGMENT**

Sahibzada Asadullah, J.- Through this single judgment, we intend to decide the following cases, having identical facts and law points involved therein.

1. W.P No. 1127-D/2017  
[Farmanullah  
Vs  
Govt. of Khyber Pakhtunkhwa and others]
2. W.P No. 702-D/2017  
[Sharifullah  
Vs  
Govt. of Khyber Pakhtunkhwa and others]

2. By virtue of these petitions filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, it is averred that the petitioners seek the directions to award promotion to the petitioners on the post of Junior Clerk in preference to Mr. Amir

Muhammad son of Yar Muhammad/respondent No. 5 and thereby by restoring the seniority of the petitioners, the promotion of respondent No. 5 may be recalled. They have further prayed that the petitioners have been deprived of promotion on the basis of fitness, therefore, the fitness criteria, as determined by official respondents is highly unjust, illegal and the policy in vogue of the Provincial Government, hence, this constitutional petition.

3. On direction of Court order, the comments were called from the respondents, which were submitted accordingly, wherein they submitted that the competent authority/Department had fulfilled all the codal formalities according to Rules and policy in vogue in the process of promotion for the post of Junior Clerk.

4. Heard. Record perused.

5. In this case facts admitted on the record reveal that there are 33% share of class-IV employees for the purpose of promotion to the post of Junior Clerk as per the recruitment policy of the provincial government. In every provincial department, the posts of Junior clerk are to be filled through 67% direct recruitment on the basis of open merits, whereas 33% posts are to be filled by way of promotion from amongst the holders of the posts of Naib Qasid, Chowkidar, etc on the basis of Seniority-cum-fitness. For the purpose of such promotion to the post of Junior Clerk, the Naib Qasid, Chowkidar etc must possess Matric Qualifications. Record further suggestive that total number of four posts of Junior Clerk were laying vacant in the office of District Education Officer

(Female), Education Department, Tank and out of said posts 33% quota was reserved for the class-IV who possess minimum matric qualification. To this effect, the respondent No.4 issued an advertisement wherein applications have been invited from the class-IV for promotion against 33% quota to the post of Junior Clerk. The petitioners having higher education as well as seniority applied for the post of Junior Clerk on the basis of 33% share of Class-IV, ultimately, the petitioners were dropped from promotion to the post of Junior Clerk and respondent No. 5 was promoted on the basis of fitness.

6. The moot issue which requires consideration and determination before this Court is that whether the fitness criteria, as determined by the official respondents with regard to promotion for the post of Junior Clerk is highly unjust and against the policy in vogue of the Provincial Government?. Before answering to this question, it will be essential to highlight that *'Eligibility for promotion'* and *'determination of fitness'* are two different criteria. Eligibility primarily relates to the terms and conditions of service and their applicability to the civil servants whereas question of fitness is a subjective evaluation on the basis of objective criteria. Section 9(1) of the Civil Servants Act 1973 provides that civil servant has a right to be considered for promotion if eligible on account of possessing the prescribed minimum qualification etc. A civil servant however has no vested right to be promoted. Section 4 of the Service Tribunals Act 1973 contemplates that any civil servant who is aggrieved with respect to the terms and

29

condition of the service has right to file appeal before appropriate tribunal established for such purposes within prescribed period. On the other hand in the matters relating to determination of fitness of a civil servant to be promoted to a higher post, the law does not provide any remedy of appeal or representation in view of section 22 of the Act of 1973. Petitioners in this case therefore have no right to appeal or representation against the impugned recommendations of Department/respondents for promotion of the post of Junior Clerk. In view of the specific bar contained in clause (b) of proviso to section 4(1) of Service Tribunals Act 1973 the petitioners lacking adequate efficacious remedy therefore has a right to seek the constitutional remedy. This petition therefore is not violative to the mandate of Article 199 and 212 of the Constitution of Islamic Republic of Pakistan 1973. Reliance be made upon *Miss Zubaida Khatoon Vs. Mrs. Tehmina Sajid Sheikh and others (2011 PLC (C.S.) 596) (Supreme Court of Pakistan)*.

7. In legal sphere, seniority-cum-fitness means that *due and equal regard should be paid both to seniority and to fitness, and, since fitness is a matter of degree, it would appear that a senior person can be overlooked in favour of a junior who is demonstrably more fit for the appointment that he is*. Thus, the provision for promotion on the basis of seniority-cum-fitness permits the respondents/Department to select a junior, who is demonstrably more fit than the senior. In other words, the rule of comparative assessment was applied. The principle of seniority-cum-merit or seniority-cum-fitness visualises

25

only rejection of the unfit. There is certainly difference where the promotion is based on the pure seniority and promotion based on seniority-cum-fitness. Likewise, in cases of promotion based on seniority cum-fitness apart from pure seniority, the person's fitness, to hold the post to which he may be promoted, his physical fitness, *his acquirement of qualifications prescribed for the promoted post* or such other positive factors from which it would be obvious that he is unfit for promotion would have to be taken into account.

8. Shorn-of unnecessary detailed to the merits of the case, it is beneficial to refer the method of recruitment, qualifications and other conditions specified in column 3 to 5 which shall be applicable to pots of Junior Clerk in the Khyber Pakhtunkhwa Civil Secretariat as infra:

Junior Clerk	(i) Matriculation with second division or equivalent qualification from a recognized Board and (ii) A speed of 30 words per minute in typing.	18 to 30 years	a) Thirty-three percent by promotion on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years' service as such, who have passed SSC examination; and b) Sixty-seven percent by initial requirement.
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From the bird's eye view of above tabulated criteria for the post of Junior Clerk, it is visible that minimum qualification for appointment or promotion to the post of Junior Clerk, a speed of 30 words per minute in typing is essential and sine qua non. Admittedly the petitioners have desperately failed in the typing test which is necessary requirement for promotion as Junior Clerk, therefore, the petitioners are not eligible according to the Rules and policy as they have failed in typing test.

9. Plea of malice or discrimination raised by the petitioners qua their deferment is not substantiated through any speck of material. We do not find any jurisdictional error, legal infirmity or material irregularity in the impugned recommendations made by the Departmental Promotion Committee, therefore, the same do not call for any interference by this Court in exercise of constitutional jurisdiction.

10. Adherence to the statutory rules and procedures for selection of public jobs is the only surest method to objectively select the best out of the best from a competing lot; it is rooted into the fundamentals of equal opportunity, equal treatment and equal protections; any deviation therefrom would rock the bottom of the Republic, resting upon equiponderance. State authority in every sphere of life is a sacred trust to be exercised fairly and justly by the functionaries to accomplish the purposes assigned to them by law; it is their bounden duty to do right to the all manner of people, without any distinction. On the basis of said analogy, the respondents/Department have rightly denied the petitioners from

the promotion being failed candidates in typing test which is sine qua non for the post of Junior Clerk.

11. Even otherwise, there is no vested right accrued to the petitioners in case of promotion. Promotion against the non-selection post shall be made on the basis of seniority-cum-fitness and a civil servant cannot claim or ask for a promotion as a matter of right, as it is within the exclusive domain of the competent authority or departmental selection committee. Neither the promotion can take place automatically, nor the seniority alone is the deciding factor, as number of factors constitute fitness for promotion. Thus, the fitness criteria, as determined by the respondents/Department is just and in accordance with Policy in vogue by the provincial government and depriving the petitioners from award of promotion to the post of Junior Clerk on the basis of fitness is on compact ground, needs no interference to invoke the constitutional jurisdiction of this Court.

12. For the reasons *supra*, the instant writ petition as well as connected W.P No. 702-D/2017 are dismissed accordingly.

Announced  
January 25, 2021

Hasnain



JUDGE



JUDGE

(D.B)

Hon'ble Mr. Justice Abdul Shakoor  
Hon'ble Mr. Justice Sahibzada Asadullah

  
29/1



# DISTRICT EDUCATION OFFICE (MALE & FEMALE) SWABI

(Office Phone & Fax No 0938280239, [ems\\_swabi@yahoo.com](mailto:ems_swabi@yahoo.com))



## AUTHORITY LETTER

Mr. Fazl Khaliq Superintendent BPS-17 Office of the District Education Officer (Male) Swabi is hereby authorized to attend and deal Departmental cases in the **Honorable Service Tribunal Peshawar, August Peshawar High Court Peshawar and apex Supreme Court of Pakistan** on behalf of the Competent Authorities i.e District Education Officer (Male & Female) Swabi in the best interest of public service

His CNIC No is 16202-0893178-1

His specimen signature is

(IRFAN ALI)

DISTRICT EDUCATION OFFICER

(MALE) SWABI

District Education Officer  
Male Swabi

(SOFIA TABASSUM)

DISTRICT EDUCATION OFFICER

(FEMALE) SWABI

District Edu. Officer  
(Female) Swabi

2/3

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Attested

29/11/2023