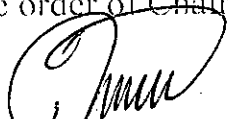


FORM OF ORDER SHEET

Court of _____

Appeal No. 126/2024

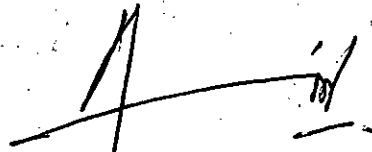
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	15/01/2024	The appeal of Mr. Amjad Ali Khan resubmitted today by him. It is fixed for preliminary hearing before touring Single Bench at Swat on _____
		By the order of Chairman
		 REGISTRAR

The appeal of Mr. Amjad Ali Khan received today i.e on 01.01.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

- 1- Address of appellant is incomplete which may be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Copy of departmental appeal for regularization of appellant from the date of advertisement i.e. 05.06.2016 mentioned in para-11 of the memo appeal is not attached with the appeal. Annexure-J is application for inclusion his name in the seniority list of C.T cadre but not a departmental appeal.
- 3- Page no.19 to 21 of the appeal are illegible.

No. 20 /S.T.

Dt. 2/1 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amjad Ali Khan Appellant.

دستور العمل کے مطابق اپیل کو مکمل کرنے کے لیے درخواست دہندہ کو 15 دنوں کے اندر اپیل کو مکمل کرنے کی ضرورت ہے۔

9-1-24

Resubmitted that objection no 1 addresses are completed, objection no 2 copy is attached and better copy of page 19 to 21 are submitted to be place before the honorable Tribunal for further proceedings.

Amjad Ali
6/1/24
Amjad Ali Khan

Amjad Ali
Amjad Ali Khan
9/1/24

13-1-24

Alto

Resubmitted after completion
and removing the objection
by placing on file the departmental
appeal against order dated 15¹²/₂₀₂₂,
as earlier incorrect appeal was placed
on file which has been replaced
with correct one.

Amjad Ali Khan
13/1/24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 126 /2024

Amjad Ali KhanAppellant

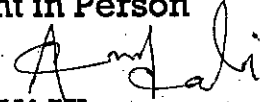
VERSUS

Govt. of K.P through Secretary
Elementary & Secondary Education & others,....Respondents

I N D E X

S.No.	Description of documents.	Annexure	Page
1.	Memo of appeal with affidavit.		1-6
2.	Addresses of parties		7
3.	Copies of educational testimonials	A	8-13
4.	Copy of advertisement	B	14
5.	Copy of Result	C	15-16
6.	Copy of appointment order	D	17-21
7.	Copy of LLB Equivalence Certificate	E	22
8.	Copy of grounds of writ petition and judgment dated 06.02.2017	F	23-31
9.	Copy of grounds of order dated 14.11.2018 passed in COC No.405-P/2018	G	32-37
10.	while Office Order dated 09.11.2018	H	38
11.	Copy of Notification dated 15.12.2022	I	39-43
12.	Copy of application / Departmental Appeal of appellant	J	44

Appellant in Person



Amjad Ali Khan

Cell No.0343-9195344/

0300-0923189

1

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

Service Appeal No. 126 /2024

Amjad Ali Khan S/o Noor Habib Jan
R/o Shalkandi, Tehsil Munda, District Dir Lower.
Certified Teacher (C.T) BPS-15, GHSS Munda, District Dir Lower

.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. Director Elementary & Secondary Education, Civil Secretariat, Peshawar
3. District Education Officer (M), Dir Lower at Timergara.

....Respondents

***SERVICE APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE ORDER/ NOTIFICATION
DATED 15.12.2022, WHEREBY THE SERVICES
OF APPELLANT WERE REGULARIZED W.E.F.
08.03.2017, THEREFORE, APPELLANT IS
SEEKING HIS REGULARIZATION FROM THE
DATE WHEN THE POST WAS ADVERTISED
AND APPOINTMENTS WERE MADE I.E.
05.03.2016***

PRAYER

On acceptance of this appeal, the Notification dated 15.12.2022 may graciously be modified to the extent that the respondents be directed to regularize the services of appellant from the date of appointment of other employees i.e. 05.03.2016, because the post in question was advertised in the year 2016, but appellant was not appointed and instead low in merit then appellant were preferred, and thereafter the appellant was appointed on 09.11.2018 in light of order/ judgment passed by the Hon'ble Peshawar High Court, Peshawar, therefore, is entitled to be regularized from the date when other employees were appointed on 05.03.2016 with all back benefits and seniority.

Sir:-

Appellant humbly submits as under:-

- 1) That appellant is bonafide and peaceful citizen of the country and hails from U/c Shalkandi, District Dir Lower.
- 2) That appellant is a well equated and qualified person having at his credit Master Degree with ADE (Associate Degree in Education). (Copies of educational testimonials are attached as Annexure "A")

- 3) That respondent No.3 advertised certain posts of C.T in different Schools of Dir Lower. **(Copy of advertisement is attached as Annexure "B")**
- 4) That appellant being qualified applied for the said post for 05 different Schools.
- 5) That appellant appeared in the written test and secured 129.63 marks and was placed at the top of merit in the Schools except GHS Maskini. **(Copy of Result is attached as Annexure "C")**
- 6) That despite being eligible, qualified and being on top of merit list, appellant was deferred from appointment with the remarks "LLB, MA Equivalence 15 days (about 02 weeks)" and instead low in merits were appointed by respondent No.3 vide its order dated 05.03.2016. **(Copy of appointment order is attached as Annexure "D")**
- 7) That the appellant provided the LLB Equivalence certificate from HEC within 05 days to respondent No.3, but of no avail. **(Copy of LLB Equivalence Certificate is attached as Annexure "E")**
- 8) That being aggrieved and having no other remedy, the appellant approached to the Hon'ble Peshawar High Court, Mingora Bench and filed W.P No.280-M/2016, which was allowed by the Hon'ble High Court in favour of appellant vide judgment dated 06.02.2017. **(Copy of grounds of writ petition and judgment dated 06.02.2017 is attached as Annexure "F")**
- 9) That despite the clear cut directions passed by the Hon'ble High Court, the appellant was not appointed,

(4)

hence he was constrained to file COC No.405-P/2018, which was disposed-off vide order dated 14.11.2018, because during pendency of Contempt Petition, respondent No.3 appointed appellant vide Office Order No.12549-51 dated 09.11.2018. **(Copy of grounds of order dated 14.11.2018 passed in COC No.405-P/2018 is attached as Annexure "G", while Office Order dated 09.11.2018 is Annexure "H")**

- 10) That thereafter, vide Notification/ order dated 15.12.2022 the regularized the services of Certified Teachers (BPS-15) appointed on Adhoc/ Contract basis w.e.f. 08.03.2017. **(Copy of Notification dated 15.12.2022 is attached as Annexure "I")**
- 11) That being aggrieved the appellant approached the concerned authority seeking his regularization from the date when other employees were appointed in light of the advertisement i.e. 05.03.2016, but of no avail. **(Copy of application/ Departmental Appeal of appellant is attached as Annexure "J")**
- 12) That being aggrieved and having no other remedy, the appellant now approaches this hon'ble Tribunal on the following grounds:-

GROUND.

- A. That the impugned order dated 15.12.2022 to the extent of non-regularizing the services of appellant from date when other employees were appointed in light of the advertisement i.e. 05.03.2016 is illegal, unlawful, without lawful authority and ineffective upon the rights of appellant, therefore, is liable to be modified to this extent.

- (5)
- B. That it is not evident on record that the post of C.T was advertised way back in the year 2016 and the appellant runs from pillar to post seeking his appointment on the post of C.T and lastly he was appointed on 09.11.2018 in light of Court order.
- C. That due to non-regularizing/ not treating the appointment order of petitioner w.e.f. 05.03.2016, he has been deprived of his seniority and other benefits as are enjoyed by other employees who were appointed in light of the same advertisement.
- D. That seniority of the appellant has been affected due to act of respondent No.3, therefore, he cannot be deprived of the same.
- E. That appellant has not been treated in accordance with law which is violation of Article 4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973.

PAYER

It is therefore, humbly prayed that on acceptance of this appeal, the Notification dated 15.12.2022 may graciously be modified to the extent that the respondents be directed to regularize the services of appellant from the date of appointment of other employees i.e. 05.03.2016, because the post in question was advertised in the year 2016, but appellant was not appointed and instead low in merit then appellant were preferred, and thereafter the appellant was appointed on 09.11.2018 in light of order/ judgment passed by the Hon'ble Peshawar High Court, Peshawar, therefore, is entitled to be regularized from the date when other

employees were appointed on 05.03.2016 with all back benefits and seniority.

Any other relief which this hon'ble court deems appropriate in the circumstances of the case though not specifically asked for may kindly also be granted.

Dated: 29-12-2023

Appellant in Person

Amjad Ali Khan
Amjad Ali Khan

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



Amjad Ali Khan
Deponent

(7)

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

Service Appeal No. _____/2024

Amjad Ali KhanAppellant

VERSUS

Govt. of K.P through Secretary
Elementary & Secondary Education & others.,...Respondents

ADDRESSES OF PARTIES

APPELLANT

Amjad Ali Khan S/o Noor Habib Jan
R/o Shalkandi, Tehsil Munda, District Dir Lower.

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education, Civil
Secretariat, Peshawar
2. Director Elementary & Secondary Education, Civil
Secretariat, Peshawar
3. District Education Officer (M), Dir Lower at
Timergara.

Appellant in Person

Amjad Ali Khan

Amjad Ali Khan

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

Service Appeal No. _____/2023

Amjad Ali KhanAppellant

VERSUS

Govt. of K.P through Secretary
Elementary & Secondary Education & others.,...Respondents

ADDRESSES OF PARTIES

APPELLANT

Amjad Ali Khan S/o Noor Habib Jan
R/o Shalkandi, Tehsil Munda, District Dir Lower.
Certified Teacher (C.T) BPS-15, GHSS Munda, District Dir Lower

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education, Civil
Secretariat, Peshawar
2. Director Elementary & Secondary Education, Civil
Secretariat, Peshawar
3. District Education Officer (M), Dir Lower at
Timergara.

Appellant in Person


Amjad Ali Khan

8

Annex (A)



UNIVERSITY OF MALAKAND

KHYBER PAKHTUNKHWA (PAKISTAN)

Serial No. B 04567

Detailed Marks Certificate

Name: **AMJAD ALI KHAN**

Father's Name: **NOOR HABIB JAN**

Registration No. **2002430161**

College/District: **Govt. Post Graduate Degree College Timergara Dir Lower**

Address: **Vill: Mulyano Banda Teh: & P/O Munda Dir.(L)**

Revised

Roll No. **340326**

B.Sc PART-II SUPPLEMENTARY EXAMINATION, 2004

Subject Name	Total Marks	Marks Obtained	Remarks	
MATH-A				
STATISTICS	75	37	PASSED	
PHYSICS	75	40	PASSED	
PAK. STUDY	75	41	PASSED	
B.Sc PART-I	40	18	PASSED	
Subject Passing Percentage: 33 (Theory & Practical Separately) Aggregate Percentage: 35% Only		285	161	PASSED
		550	297	

Examination held from February, 2005

Result declared on 27-Apr-2005



Errors and Omissions are subject to subsequent rectification.

The examination was taken in Parts

Date of Issue: 27-Jan-2016

Prepared by: Amjad Shanzad

Attested
 Assistant Professor
 G.D.C. Samsar Isghar
 Dist: Dir. (L)

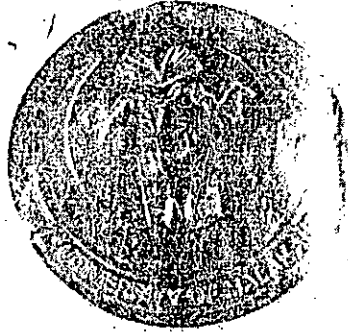
[Signature]
 Controller of Examinations
 University of Malakand

ATTESTED

[Signature]

UNIVERSITY OF MALAKAND
PAKISTAN

Serial No. 005557



9



Session 2002-2004

AMJAD ALI Son of NOOR HABIB JAN Registration No. 2002430161 Student of Govt. Degree College
Timargara Dir Lower having passed the prescribed examination held in Feb, 2005 under Roll No. 340326 is
admitted by the University of Malakand to the degree of

Bachelor of Science

in Second Division

The examination was taken in parts.

Result Declared on 27-Apr-2005

Issuance Date 07-Jul-2011

Attested
Controller of Examinations
Dir (L)
Countersigned

m. Rasheed
Vice Chancellor

ATTESTED

A

Book No. 183

Pass Marks in each Paper 40 %
Aggregate Marks 45 %
1st Division 60 %
2nd Division 45 %

S. No. 1107

قوی زبان میں تعلیم



قوی ترقی کا رویہ

Federal Urdu University

Of

Arts, Science & Technology.

L.L.B (Final) Annual Examination, 2007 held in May 2008

MARKS CERTIFICATE

وفاقی اُردو یونیورسٹی برائے فنون، سائنس اور ٹیکنالوجی

ایل ایل بی (فائنل) سالانہ امتحان ۲۰۰۷ء منعقدہ مئی ۲۰۰۸ء

مارکس سرٹیفکیٹ

Following are the marks obtained by AMJAD ALI KHAN.

S/o, D/o. NOOR HABIB JAN.

College / Institute Al-Mezan Law College

Seat No. 2505

Enrolment No. AL/280/05

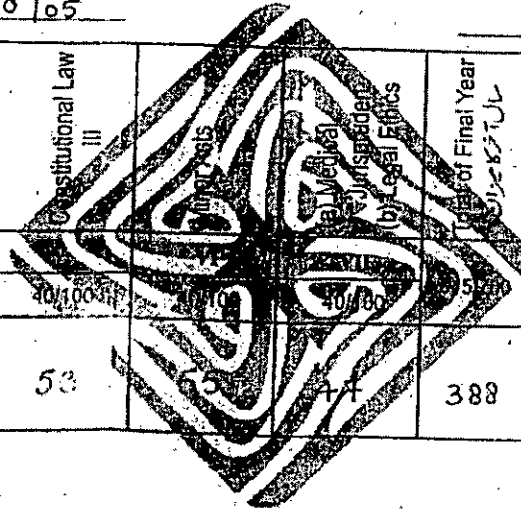
درج ذیل نشانات امجد علی خان

والد/بیت نور حبیب جان نے حاصل کیے

المیزان لاء کالج

کالج / ادارہ

(a) Civil Procedure (b) Limitation Act	Criminal Procedure Code	Law of Evidence	Conveyancing & Pleading	Constitutional Law III	Total of Final Year سال آخر کا مجموعہ	Total of 2nd Year سال دوم کا مجموعہ	Total of 1st Year سال اول کا مجموعہ	کل مجموعہ Grand Total	نتیجہ Result	تفصیلات Remarks
I	II	III	IV							
40/100	40/100	40/100	40/100	40/100	388	315/700	270/600	900/2000		
42	48	61	82	53	388	399	306	1093	2 nd .	



Attested
Assistant Professor
G.D.C Samar Bhatta
Distt: Dibr (L)
08 SEP 2008

ATTESTED

تعمیر امتحانات

نوٹ: - جو غلطی مارکس سرٹیفکیٹ میں کسی بھی قسم کی غلطی ہو اس کو درست کر کے کاپی فراہم کرنے کی ضرورت ہے۔

11

Serial No. 2505

۲۵۰۵



وفاقی اردو یونیورسٹی

برائے فنون، سائنس اور ٹیکنالوجی

Federal Urdu University
of Arts, Sciences and Technology

FACULTY OF ARTS
Bachelor of Laws

کلیہ فنون
ایل ایل بی
ہرگاہ

Be it known that

Amjad Ali Khan

VERIFIED
Examinations Department
Federal Urdu University of Arts
& Technology

امجد علی خان

Noor Habib Jan

نور حبیب جات

has pursued a course of study prescribed by this University for the Degree of Bachelor of Laws in the Faculty of Arts and has passed the requisite examination of 2007 held in 2008, having been placed in 2nd class/grade.

نے کلیہ فنون کے تحت ایل ایل بی کی سند کے لئے اس جامدہ کے منظور شدہ نصاب کی تکمیل کرنی ہے اور مطلوبہ امتحان ۲۰۰۷ منعقدہ ۲۰۰۸ میں کامیاب ہو کر

It is hereby certified that he/she has been duly admitted to the degree of Bachelor of Laws in this University.

لہذا تصدیق کی جاتی ہے کہ ایل ایل بی اس جامدہ میں ایل ایل بی کے درجہ پر نفاذ کیا گیا ہے

Assistant Professor
Dina Ditt (L)

[Signature]

[Signature]
Vice-Chancellor

[Signature]
شیخ الہامد

[Signature]
مستقل

Dated 5-12-2009

Attested

5-12-2009 تاریخ

Note: Detailed transcripts of examination results have been made available

امتحان کے نتائج تفصیلاً مندرجہ ذیل کے دفتر میں دستیاب ہیں

ATTESTED
[Signature]

(12)



University of Peshawar
Pakistan

Detailed Marks Certificate

Law Legum Magister (Master of Laws)

LLM Part-II

Annual Examination 2013

Name: AMJAD ALI KHAN

Roll No: 205

Father's Name: NOOR HABIB JAN

Registration No: 2011-CSL-21

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Comparative Constitutional Law-II	100	72%	Seventy two (Percent) Passed
Thesis: Topic: The System of Narcotics in Pakistan	100	59%	Fifty nine (Percent) Passed
TOTAL	100	66%	Passed

Errors & omission are subsequent rectification


ATTESTED

The Examination was taken As a Whole

Examination held on 28 April 2014

Result declared on 23 December 2015

Issue Date 03-January-2017


(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

13

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar Pakistan

This certifies that

Amjad Ali Khan son of Noor Habib Jan

having fulfilled all the requirements is hereby admitted to the degree of

Master of Laws

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 23rd day of December, 2016.

Roll No. 205

Session: Annual 2013

Reg. No. 2011-CSL-21

ATTESTED



122801

[Handwritten Signature]

Registrar

[Handwritten Signature]
Vice Chancellor

Handwritten signature

15

Annex (C)

Elementary and Secondary Education Department,
Khyber Pakhtunkhwa (Recruitment Test)
Appointment of Teachers (Adhoc School Based)
 Test held on: Saturday 21st, Sunday 22nd, Saturday 28th & Sunday 29th November 2015

(Provisional Merit List)

Search Result for the keyword "891100822"

Upload Date : Friday, 25th December 2015.

Send your query on printout to NTS Regional office, Rahatabad colony, Near Pakistan Forest Institute, Peshawar latest by 4th January, 2016 positively through courier or postal service. Late receive will not be received.

Roll No	Roll No	Name	Father Name	CNIC	Post	School Code	School Name	District	Post Type
1	891100822	AMJAD ALIKHAN	NOOR HABIB JAN	15304-6713807-5	CT General BPS-15	181039	GMS KAKAS	SHALKANDI	LOWER DIR

SSC		HSSC		Graduation		Bachelor (Hons) (10 & 12)		Bachelor (Hons) (10 & 12)		Master		M.Phil		Diploma		M.Ed/M.A.Ed		Merit %	NTS Marks	Total Marks													
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total																
560	850	13.18	613	1100	11.15	297	550	10.8	0	0	0	0	0	0	0	0	0	0	1093	2000	8.2	0	0	0	3	4	12.3	0	0	0	55.53	74	129.63

Roll No	Roll No	Name	Father Name	CNIC	Post	School Code	School Name	District	Post Type
1	891100822	AMJAD ALIKHAN	NOOR HABIB JAN	15304-6713807-5	CT General BPS-15	181015	GMS MASKINI	SHALKANDI	LOWER DIR

SSC		HSSC		Graduation		Bachelor (Hons) (10 & 12)		Bachelor (Hons) (10 & 12)		Master		M.Phil		Diploma		M.Ed/M.A.Ed		Merit %	NTS Marks	Total Marks													
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total																
560	850	13.18	613	1100	11.15	297	550	10.8	0	0	0	0	0	0	0	0	0	0	1093	2000	8.2	0	0	0	3	4	12.3	0	0	0	55.53	74	129.63

Roll No	Roll No	Name	Father Name	CNIC	Post	School Code	School Name	District	Post Type
1	891100822	AMJAD ALIKHAN	NOOR HABIB JAN	15304-6713807-5	CT General BPS-15	181036	GMS BIN SHAHI	SHALKANDI	LOWER DIR

SSC		HSSC		BA		20%		15%		MA		M.Phil		Diploma		M.Ed/MA Edu		Marks		Marks		Marks			
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total						
560	850	13.18	813	1100	11.16	297	650	10.8	0	0	0	0	0	0	0	0	0	0	0	0	0	55.63	74	129.63	

Matr No	Roll No	Name	Father Name	CNIC	Post	School Code	School Name	Union Council	Domicile
1	891100822	AMJAD ALIKHAN	NOOR HABIB JAN	15304-6713807-5	CT General BPS-15	181020	GHS SHAL KANDI	SHALKANDI	LOWER DIR

SSC		HSSC		Graduation		Bachelor (Hons) (Year 1 & 2)		Bachelor (Hons) (Year 3 & 4)		Master		M.Phil		Diploma		M.Ed/MA Edu		Academic Marks		M.TS Marks		Total Marks			
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total						
560	850	13.18	813	1100	11.16	297	650	10.8	0	0	0	0	0	0	0	0	0	0	0	55.63	74	129.63			

Matr No	Roll No	Name	Father Name	CNIC	Post	School Code	School Name	Union Council	Domicile
1	891100822	AMJAD ALIKHAN	NOOR HABIB JAN	15304-6713807-5	CT General BPS-15	181038	GHS GODDAR	SHALKANDI	LOWER DIR

SSC		HSSC		Graduation		Bachelor (Hons) (Year 1 & 2)		Bachelor (Hons) (Year 3 & 4)		Master		M.Phil		Diploma		M.Ed/MA Edu		Academic Marks		M.TS Marks		Total Marks			
Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total						
560	850	13.18	813	1100	11.16	297	650	10.8	0	0	0	0	0	0	0	0	0	0	0	55.63	74	129.63			

Current Date / Time: Saturday 26th, December 2015, 01:24:54 PM

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ATTESTED

CT-order 5-3-2016 40 => $\frac{39}{40}$

Page 1 of 2



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Lower (Phone # 0945 920081-82)

Annex (D)

APPOINTMENT

SIC

(17)

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant CT posts on one year Ad hoc School based policy in BPS: 15 (Rs.10985/-) Fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government in Teaching Cadre on the terms & conditions given below with effect from the date of their taking over charge in the interest of public service.

S.#	Name of candidate	Father's Name	Name of school	D/O Birth	Score	Remarks
1	MAJID ULLAH	FAZAL MANAN	GHSS Zaimdara	12/04/1987	139.97	A.V.Post
2	TASHEEN ULLAH	RIAZUL HAQ	GHSS Hayaserai	17/05/1993	134.67	A.V.Post
3	AHMAD ZAIB	SULTAN ZEB	GMS Tangi Khadazal	20/04/1986	134.09	A.V.Post
4	SANA ULLAH	ABDUL QAYUM KHAN	GHSS Manyal	01/01/1991	133.15	A.V.Post
5	SHER HAYAT KHAN	ABDUL HAMID KHAN	GHS Maskini	10/11/1985	132.31	A.V.Post
6	IFTIKHAR ULLAH	RIAZUL HAQ	GHSS Manyal	05/09/1988	131.19	A.V.Post
7	IQBAL KHAN	MUHAMMAD ZAMAN KHAN	GCMHS Timergara	11/01/1979	130.32	A.V.Post
8	ABDUL GHAFOOR	HAMESH GUL	GHSS Luqman Banda	31/05/1991	129.06	A.V.Post
9	ABDULLAH	FATEH MUN KHAN	GHSS Quch	07/02/1990	128.84	A.V.Post
10	RAB NAWAZ	GHULAM HUSSAIN	GMS Khadang	28/07/1991	128.38	A.V.Post
11	NAEEM ULLAH	BUNIR KHAN	GMS Kando Machla	20/08/1991	128.33	A.V.Post
12	SADEEQ ULLAH	MUHAMMAD AMIN SHAH	GHS Malekand	12/02/1992	128.13	A.V.Post
13	ABASIN BARYAL	SAID BAHADAR	GHSS Sia Warghar	21/05/1989	128.12	A.V.Post
14	IMAD UD DIN	ABDUR RAHIM	GHSS Manyal	08/03/1982	127.94	A.V.Post
15	IBRAHIM SHAH	MUHAMMAD AZIZ KHAN	GHSS Kheli	01/01/1988	127.93	A.V.Post
16	MUHAMMAD HUMAYUN	SIRAJUL HAQ	GHS Dalgram	01/05/1991	127.84	A.V.Post
17	MURAD ALI	NOOR MUHAMMAD	GHS Shalkandi	02/03/1990	127.29	A.V.Post
18	FAZAL HAKEEM	ABDUS SALAM	GMS Godar	10/03/1987	127.21	A.V.Post
19	JEHAN SHER KHAN	ABDUL HAQ	GHS Shorshing	13/04/1991	127.11	A.V.Post
20	SAMMAM PASHA	SHAD MUHAMMAD KHAN	GHS Mian Kalay	10/05/1986	126.55	A.V.Post
21	SHAFIQ AHMAD	FARIDOOD KHAN	GHS Chinarkot	02/05/1986	126.12	A.V.Post
22	MUHAMMAD BASHIR	MUHAMMAD KHAN	GHS Gumbat Banda	09/12/1986	125.32	A.V.Post
23	FAZAL HAKIM	FAZAL RAHMAN	GMS Kakas	20/01/1986	125.29	A.V.Post
24	MOHAMMAD SHUAIB	KHAN MUHAMMAD	GMS Bin Shahi	20/04/1992	124.94	A.V.Post
25	WASIM UL BARI	OBAIDUL BARI	GMS Nawagal'Asbanr.	01/03/1985	124.88	A.V.Post
26	KIFAYAT ULLAH	MUSAFAR KHAN	GHS Chinarkot	25/02/1987	124.56	A.V.Post
27	BAKHT ZUD DIN	MAJID KHAN	GMS Bin Shahi	10/06/1989	124.49	A.V.Post
28	MUJAHID FAROOQ SADIQI	MUHAMMAD NAEEM	GHS Laram	27/02/1990	124.33	A.V.Post
29	MIAN RAHMAN	MIAN GUL	GHS Sia Warghar	02/06/1983	124.06	A.V.Post

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30	FIDA ULLAH	ZAKIRULLAH	GHS Adam Dheri	13/07/1987	124.02	A.V.Post
31	MUHAMMAD HAYAT	SADAR HAYAT	GHS Chinarkot	01/01/1988	123.81	A.V.Post
32	TARIQ KAMAL	ZARAB KHAN	GMS Khwas	05/04/1989	123.75	A.V.Post
33	IMRAN KHAN	SALEH MUHAAMAD	GMS Undesa	20/03/1992	123.65	A.V.Post
34	ASIF KHAN	SARDARAZ KHAN	GHSS Mayar Jandol	13/01/1991	123.3	A.V.Post
35	MUHAMMAD SAJID	MUHAMMAD NAGIN	GHS Shorshing	01/12/1990	123.21	A.V.Post
36	AHMAD SHAH	SARFARAZ KHAN	GHS Bandal Maidan	06/01/1987	123.2	A.V.Post
37	MUHAMMAD AKBAR	BANARAS KHAN	GMS Razagram	01/02/1985	122.3	A.V.Post
38	ZARIF KHAN	MUHAJAREEN KHAN	GHSS Luqman Banda	15/01/1978	121.59	A.V.Post
39	HAJ MUHAMMAD KHAN	FAQIR KHAN	GHS Lalbook	02/02/1983	120.56	A.V.Post

Terms & Conditions

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 05.03.2016 to 04.03.2017.
4. He should not be handed over charge if he exceeds 35 (Thirty Five) with 3 (Three) years automatic relaxation for Malakand Division or is below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities, anyone found producing bogus certificate/s or degree/s his appointment shall be cancelled and he will be reported to the Law enforcing agencies for further legal action.
6. His services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one month pay/allowances shall be forfeited to the Government treasury.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents are verified.
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. He will be governed by such Rules and Regulations may be issued from time to time by the Government.
11. His services shall be terminated at any time in case his performance is found unsatisfactory during his service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting and his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant as per qualification and rules charge of the post may not be handed over.
14. Errors and omissions will be acceptable within the specified period.

(PROF. MUHAMMAD UZAIR ALI)
DISTRICT EDUCATION OFFICER
DIR LOWER AT TIMERGARA

Endst No: 3936-4011/CT/Appointment/Ad hoc/NTS dated: 05/03/2015

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

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Dir Lower.
3. Principal/Headmaster concerned.
4. Deputy DEO Male Local Office.
5. The B&AO Local Office.
6. The Supdt Secondary Local Office.
7. The candidates concerned.
8. Master File.

ATTESTED

DISTRICT EDUCATION OFFICER
DIR LOWER AT TIMERGARA

Intikhab Photo Store
Near National Bank Colony,
Balambat Chowk, Timergara.
Ph: 0945-622994, Mob: 0300-9398707

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MINUTES 3-3-2016

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DIR-LOWER

MINUTES OF THE MEETING HELD ON 03/03/2016 AT THE OFFICE OF THE DISTRICT
EDUCATION OFFICER DIR-LOWER TIMMIGARA.

1. A meeting of the Departmental Selection Committee was held on 03-03-2016 under the Chairmanship of the District Education Officer, Male Dir-Lower in his office at 09:00 AM in connection with recruitment against various advertised vacant CT, AT, TT, DM, PET and Qari posts in Education Department, District Dir-Lower. The following attended the meeting:

1. Prof. Muhammad Uzair All District Education Officer, Male Dir-Lower.
2. Representative of the Directorate.
3. Mr. Aif Haidar ADO Secondary Establishment Local Office Dir-Lower.
4. Mr. Muhammad Islam ADO Primary Local Office Dir-Lower.
5. Mr. Wajihuddin ADO Physical Local Office Dir-Lower.
6. Mr. Nowshad Khan Suptt. Establishment Local Office Dir-Lower.
7. Mr. Muhammad Safir D/A CT and DM Local Office.
8. Mr. Mukhtiar Ahmad D/A AT, TT and Qari Local Office.
9. Mr. Saifuddin D/A PET Local Office.

2. The meeting started with the recitation from the Holy Quran. The chair welcomed the participants and thanked them for their timely attendance. The Committee was informed that these posts were advertised "Through NTS" and that 28.08.2015 was fixed as the last date for submission of forms.

3. The original Academic and Professional documents of the candidates were thoroughly checked with the NTS merit lists by various scrutiny committees constituted for this purpose. Thus the merit lists for various teaching posts were set after appropriately editing the result as per the academic and professional testimonials of the candidates.

4. Merit lists so prepared were duly reported in the newspapers and social media and displayed in the Office with the instructions for the candidates to submit their objections/appeals, if any. Some appeals of minor nature were received and disposed off well in time.

5. The Committee was informed that interviews for the mentioned post were conducted as per schedule duly notified through newspapers on the 19th and 20th February 2016.

6. The Departmental Selection Committee expressed satisfaction over the work of the scrutiny committees, checked each and every file of the short listed candidates as per merit order and noted the following points:

- a. That all the posts were to be filled on Ad hoc school based criteria as per the advertisement.
- b. That all the candidates were duly informed through Press Media to submit original and photocopy of their documents for checking.
- c. That as the advertised posts at the secondary level for various categories were less than 50 each, therefore, the Committee was unable to implement 2% disable quota. However, as per 3% minority quota one minority CT post could have been reserved for minority had there been any NTS minority applicant available.
- d. That the Deen-e-Asnad required for AT, TT and Qari posts were examined as per the prevailing policy and rules issued by the Government.
- e. That some refusals/options either through written or telephonic messages were received which were accepted by the DSC.
- f. The Committee also approved that further postings, if any, be made as per policy, merit order, eligibility and availability of any of the advertised vacant posts and/or recommended/appointed candidate/s did not take charge of his/their post/s.
- g. The DSC also recommended that the list of the recommended candidates may once more be displayed for a day or two and issues be resolved if still any before issuing appointment orders.
- h. The Committee also recommended age relaxation, if any, for those on merit.
- i. As per Merit Lists for various posts the following recommendations were unanimously agreed upon by the Committee for appointment on forty (40) CT, twelve (12) AT, seven (7) TT, ten (10) Qaris, four (4) PETs and ten (10) DMs.

ATTESTED

[Signature]

Imtiaz Photo State
Near National Bank Colony,
Kolabhat Chowk, Timergara.
Mob: 0300-9398767

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DIR LOWER**

**MINUTES OF THE MEETING HELD ON 03.03.2016 AT THE OFFICE OF THE DISTRICT EDUCATION OFFICER DIR
LOWER AT TIMERGARA.**

1. A meeting of the Departmental Selection Committee was held on 13.03.2016 under the Chairmanship of the District Education Officer (Male) Dir Lower in his office at 09:00 AM in connection with recruitment against various advertised vacant CT, AT, TT, DM, PET and Qari posts In Education Department District Dir Lower. The following attended the meeting:-
 1. Prof. Muhammad Uzair All District Education Officer Male Lower.
 2. Representative of the Directorate
 3. Mr. All Halder. ADD Secondary Establishment Local Office Dir Lower.
 4. Mr. Muhammad Islam ADO Primary Local Office Dir Lower.
 5. Mr. Wajihuddin ADO Physical Local Office Dir Lower.
 6. Mr. Nowshad Khan Suptt: Establishment Local Office Dir Lower
 7. Mr. Muhammad Safir D/A CT and DM Local office
 8. Mr. Mukhtiar Ahmad D/A AT, TT and Qari Local Office
 9. Mr. Safiuddin D/A PET Local Office.
2. The meeting started, with the recitation from the Holy Quran. The chair welcomed the participants and thanked them for their timely attendance. The Committee was informed that these posts were advertised, "Through NTS" and that 28.08.2015 was fixed as the last date for submission of _____ form.
3. The original Academic and Professional documents of the candidates were thoroughly checked with the NTS merit lists by various constituted for this purpose and the merit lists for various teaching posts were sec after appropriately editing the result as per the academic and professional testimonials of the candidates.
4. Merit it lists so prepared were duly reported in the newspapers and social media and displayed in the Office with instructions for the candidates to submit their objections/appeals, if any. Some appeals of minor nature were received and disposed off well in time.
5. The Committee was informed that that interviews for the mentioned were conducted as per as per schedule duly notified through newspapers on the 19th and 20th February 2016.
6. The Departmental Selection Committee expressed satisfaction over the work of the scrutiny committees, checked each and every file of the short listed candidates as per merit order and noted the following points:-
 - a. That all the posts were to be filled on Ad hoc school based criteria as per the advertisement.
 - b. That all the candidates were duly informed through Press Media to submit original and photocopy of their documents for checking.
 - c. That as the advertised posts at the secondary level for various categories were less than 50 each, therefore the Committee was unable to implement 2% disable quota. However as per 3% minority quota one minority CT post could have been reserved for minority had there been any NTS minority applicant available.
 - d. That the Deeni Asnad required for AT, TT and Qari posts were examined as per the prevailing policy and rules issued by the Government.
 - e. That some refusals / option either through written or telephonic messages were received which were accepted by the DSC.
 - f. The Committee also approved the further posting were be made as per policy, merit order, eligibility and availability of the advertised vacant posts in case a recommended/appointed candidate/s did not take their charge of his/their posts.
 - g. The DSC also recommended candidates may once more be display for a once for a day or two and issues be resolved if still any before is issuing appointment orders.
 - h. The Committee also recommended age relaxation, if any for those on merits.
 - i. As per Merit Lists for various posts the following recommendations were unanimously agreed upon by the Committee for appointment on forty (40) CT, Twelve (12) AT, Seven (7)TT, ten (10) Qaris, four (4) PETs and then (10) DMS.

Attested
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Sl. No.	Name	Date of Birth	Remarks
1	FAZAL MUHAMMAD	17/04/1988	Recommended at GHSS Zamdara
2	FASHEEN UD DHA	17/05/1988	Already on PST. Not interested. Hence not considered.
3	ARMAN ZABI	17/05/1988	Recommended at Hayaseral
4	HAMID ULLAH	17/05/1988	Already on SST. Not interested. Hence not considered.
5	SHER HAYAT KHAN	01/07/1989	Recommended at GHSS Manyal
6	IFTIKHAR ULLAH	10/11/1985	Recommended at GHS Maskini
7	AMINUR RAHMAN	05/07/1988	Recommended at GHSS Manyal
8	ABDUL GHAFOOR	07/07/1988	Already on IT post at GHSS Rabat. Hence not considered.
9	ABDUL KHAAN	07/07/1988	Recommended at GCMHS Tmerigara
10	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
11	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
12	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
13	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
14	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
15	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
16	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
17	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
18	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
19	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
20	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
21	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
22	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
23	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
24	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
25	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
26	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
27	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda
28	ABDUL KHAAN	07/07/1988	Recommended at GHSS Luqman Banda

ATTESTED

(BETTER COPY NO 20)

A. Certified Teachers (CT) BPS-15.

S.#	Name of Candidate	Fathers Name	D/O Birth	Score	Remarks
1.	MAJID ULLAH	FAZAL MANAN	12/04/1987	139.97	Recommended at GHSS Zaimdara
	AMJAD ALI KHAN			136.09	Already PST. Not interested. Hence not considered
2.	TASHEENULLAH	RIAZ UL HAQ	17/05/1993	134.57	Recommended at Hayaserai
	MUHAMMAD AASIM			134.45	Already SST. Not interested. Hence not considered
3.	AHMAD ZAIB	SULTAN ZEB	20/04/1986	134.09	Recommended at GMS Tangi Khadazai
	HAMID ULLAH			134.03	Already sST. Not interested. Hence not considered
4.	SANA ULLAH	ABDUL QAYUM KHAN	01/01/1991	133.15	Recommended at GHSS Manyal
5.	SHER HAYAT KHAN	ABDUL HAMID KHAN	10/11/1985	132.31	Recommended at GHSS Maskini
6.	IFTIKHAR ULLAH	RIAZ UL HAQ	05/09/1988	131.19	Recommended at GHSS Manyal
	AMIN UR RAHMAN			130.66	Already on IT posts at GHSS Rabat. Hence not considered
7.	IQBAL KHAN	MUHAMMAD ZAMAN KHAN	11/01/1979	130.32	Recommended at GHSS Timergara
	AMJAD ALI KHAN			121.39	L.L.B Pending for MA equivalency (15 days for provision). Hence deferred.
8.	ABDUL GHAFOOR	HAMESHA GUL	31/05/1991	129.06	Recommended at GHSS Luqman Banda
9.	ABDULLAH	FATHE MUN KHAN	07/02/1990	128.84	Recommended at GHSS Ouch
10.	RAB NAWAZ	GHULAM HUSSAIN	28/07/1991	128.38	Recommended at GMS Khadang
11.	NAEEM ULLAH	BUNIR KHAN	20/08/1991	128.33	Recommended at GMS Kando Machla
12.	SADEEQ ULLAH	MUHAMMAD AMIN SHAH	12/12/1992	128.13	Recommended at GHS Malakand
13.	ABASIN BARYAL	SAID BAHADAR	21/05/1989	128.12	Recommended at GHSS Sia Warghar
14.	IMAD UD DIN	ABDUR RAHIM	08/03/1982	127.94	Recommended at GHSS Manyal
15.	IBRAHIM SHAH	MUHAMMAD AZIZ KHAN	01/01/1988	127.93	Recommended at GHSS Khall
16.	MUHAMMAD HUMAYUN	SIRAJ UL HAQ	01/05/1991	127.84	Recommended at GHS Dalagram
17.	MURAD ALI	NOOR MUHAMMAD	02/03/1990	127.29	Recommended at GHS Shalkandi
18.	FAZAL HAKEEM	ABOUS SALAM	10/03/1987	127.21	Recommended at GMS Godar
	JAVID IQBAL	JEHAN SHER KHAN		127.13	IMU DCMA. Not interested. Hence not considered.
19.	JEHAN SHER KHAN	ADUL HAQ	13/04/1991	127.11	Recommended at GHS Shorshing
	HAFEEZ UR RAHMAN			126.89	Not Eligible
20.	SAMMAM PASHA	SHAH MUHAMMAD KHAN	10/05/1986	126.55	Recommended at GHS Mian Kalay
21.	SHAFIQ AHMAD	FARIDDON KHAN	02/15/1986	126.12	Recommended at GHS Chinarkot
22.	MUHAMAD BASHIR	MUHAMMAD KHAN	09/12/1986	125.32	Recommended at GHS Gumbat Banda
23.	FAZAL HAKIM	FAZAL RAHMAN	21/01/1986	125.29	Recommended at GMS Kakas
24.	MOHAMMAD SHUAIB	KHAN MUHAMMAD	20/04/1992	124.94	Recommended at GMS Bin Shahi
25.	WASIM UL BARI	OBALDUL BARI	01/03/1985	124.88	Recommended at GMS Nawagai Asbanr
	KHALID HUSSAIN			124.73	Already CT at GHS Mirgam Bala. Hence not considered
	IJAZ AHMAD			124.7	Already on PST at GPS Kotigram colony. Hence not considered
26.	KIFAYAT ULLAH	MUSAFAR KHAN	25/02/1987	124.56	Recommended at GHS Chinarkot
27.	BAKHT ZUD DIN	MAJID KHAN	10/06/1989	124.49	Recommended at GMS Bin Shahi
28.	MUJAHID FAROOQ SADIQI	MUHAMMAD NAEEM	27/02/1990	124.33	Recommended at GHS Laram

Attested

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	IMRAN KHAN	MIRNIGUL			Recommended at GHS Sla Warghar
30.	FIDA ULLAH	ZAKIR UDDIN	03/07/1987	124.60	Recommended at GHS Adam Oheri
	GOHAR AYUB KHAN			123.87	Not Eligible
31.	MUHAMMAD HAYAT	SADAB HAYAT	03/07/1988	123.81	Recommended at GHS Chinarkot
32.	TARIQ KAMAL	ZARAB KHAN	05/07/1989	123.75	Recommended at GMS Khwas
	ASAD ZAIN AN KHAN			123.69	Telephonically Not interested and absent in interview. Hence not considered.
33.	IMRAN KHAN	SALEH MUHAMMAD	20/03/1997	123.65	Recommended at GMS Undesa
34.	ASIF KHAN	SARDAR KHAN	13/01/1991	123.3	Recommended at GHSS Mayar Jandol
35.	MUHAMMAD SAJID	MUHAMMAD NAGIN	10/12/1990	123.24	Recommended at GHS Shorshing
36.	AHMAD SHAH	SABERAZ KHAN	05/04/1995	123.2	Recommended at GHS Bandal Maidan
	FAZL ULLAH			123.02	Non availability of Post
	SAEED ULHAD			122.93	Non availability of Post
	JALAL UDDIN			122.39	Non availability of Post
	SADQAT SHAH			122.36	Non availability of Post
37.	MUHAMMAD AKBAR	BANARAS KHAN	01/02/1985	122.3	Recommended at GMS Bazagram
	TAWSEEF KHAN			121.99	Non availability of Post
	RIZWAN ULLAH			121.93	Non availability of Post
	MUHAMMAD AFZAL			121.83	Non availability of Post
	HAFIZ ULLAH			121.8	Non availability of Post
	MUHAMMAD HUSSAIN			121.76	Non availability of Post
38.	ZARIF KHAN	MUHAMMAD KHAN	05/03/1994	121.59	Recommended at GHSS Lugman Banda
	KAMRAN AHMAD			121.49	Non availability of Post
	IFTIKHAR UDDIN			121.24	Non availability of Post
	IMRAN KHAN			121.21	Non availability of Post
	ASIF ALI			120.83	Non availability of Post
	MUHAMMAD MUHTASHAM			120.82	Non availability of Post
	AURANG ZEB KHAN			120.63	Non availability of Post
39.	HAJ MUHAMMAD KHAN	FAQIR KHAN	02/02/1983	120.56	Recommended at GHS Lajback

B. Drawing Masters (DM) BPS 15

S. #	Name of candidate	Father's Name	D/O Birth	Score	Remarks
	MUHAMMAD IMRAN			121.75	Deferred. DM certificate/diploma to be first verified.
	ABDUL BASIT			121.51	Deferred. DM certificate/diploma to be first verified.
	HAJ MUHAMMAD KHAN			107.83	Deferred. DM certificate/diploma to be first verified.
	LATIF UR RAHMAN			107.48	Deferred. DM certificate/diploma to be first verified.
	IQBAL KHAN			107.23	Already IT at Kamal khel Tall. Hence not considered.
1	BAKHT NAZIR KHAN	MUHAMMAD ZAMIN	30/02/1981	105.73	Recommended at GMS Undesa
2	MUBARAK DIN	MUHAMMAD SHARIFULLAH	10/08/1986	102.31	Recommended at GHS Shaiknai

ATTESTED

(BETTER COPY NO 21)

s.#	Name of Candidate	Fathers Name	D/O Birth	Score	Remarks
29.	MIAN RAHMAN	MIAN GUL	02/06/1983	124.06	Recommended at GHSS Sia Warghar
30.	FIDA ULLAH	ZAKIR ULLAH	13/02/1987	124.02	Recommended at GHSS Adam Dheri
	GOHAR AYUB KHAN			123.87	Recommended at GHSS Chinar Kot
31.	MUHAMMAD HAYAT	SADAR HAYAT	01/01/1988	123.81	Recommended at GMS Khwas
32.	TARIQ KAMAL	ZARAB KHAN	05/04/1989	123.75	Telephonically Not interested and absent in interview. Hence not considered
	ASAD ZAMAN KHAN			123.69	Recommended at GMS Undesa
33.	IMRAN KHAN	SALEH MUHAMAD	20/03/1992	123.65	Recommended at GHSS Maqyar Jando
34.	ASIF KHAN	SARDARAZ KHAN	03/01/1991	123.3	Recommended at GHSS Shorshing
35.	MUHAMMAD SAJID	MUHAMMAD NAGIN	01/12/1990	123.21	Recommended at GHS Bandai Maidan
36.	AHMAD SHAH	SARFARAZ KHAN	06/01/1987	123.2	Non-availability of Post
	FAZLULLAH			123.02	Non-availability of Post
	SAEED UL HAQ			122.43	Non-availability of Post
	JALAL UDDIN			122.39	Non-availability of Post
	SADAQAT SHAH			122.35	Recommended at GMS Bazargram
37.	MUHAMMAD AKBAR	BANARAS KHAN	01/02/1985	122.3	Non-availability of Post
	TAWSEEF KHAN			121.99	Non-availability of Post
	RIZWAN ULLAH			121.93	Non-availability of Post
	MUHAMMAD AFZAL			121.83	Non-availability of Post
	HAFIZ ULLAH			121.8	Non-availability of Post
	MUHAMMAD HUSSAIN			121.76	Recommended at GHSS Luqman Banda
38.	ZARIF KHAN	MUHAJAREEN KHAN	15/01/1978	121.59	Non-availability of Post
	KAMRAN AHMAD			121.49	Non-availability of Post
	IFTIKHAR UDDIN			121.24	Non-availability of Post
	IMRAN KHAN			121.2	Non-availability of Post
	ASIF ALI			120.83	Non-availability of Post
	MUHAMMAD MUHTASHAM			120.82	Non-availability of Post
	AURANGZEB KHAN			120.63	Non-availability of Post
39.	HAJI MUHAMMAD KHAN	FAQIR KHAN	02/02/1983	120.56	Recommended at GHS Lajbook

B. Drawing Masters (DM) BPS-15

s.#	Name of Candidate	Fathers Name	D/O Birth	Score	Remarks
	MUHAMMAD IMRAN			121.75	Deferred. DM certificate / diploma to be first verified
	ABDUL BASIT			213.51	Deferred. DM certificate / diploma to be first verified
	HAJI MUHAMMAD KHAN			107.83	Deferred. DM certificate / diploma to be first verified
	LATIF UR RAHMAN			107.48	Deferred. DM certificate / diploma to be first verified
	IQBAL KHAN			107.23	Already TT at Kamal Khel Tall. Hence not considered
1.	BAKHT NAZIR KHAN	MUHAMMAD ZAMIN	02/02/1981	105.73	Recommended at GMS Undesa
2.	MUBARAK DIN	MUHAMMAD SHARIFULLAH	10/081986	102.31	Recommended at GHS Shalknai

Attested

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ہائر ایجوکیشن کمیشن

Annex (E)

22

HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad (Pakistan), Phone: +92-51-90400909
Fax: +92-51-90400902, URL: <http://www.hec.gov.pk>

FARRUKH RAZA

Assistant Director (A&A)
fraz@hec.gov.pk

No.8-64/HEC/A&A/2016/11864
March 8, 2016

Mr. Amjad Ali Khan,
S/o Noor Habib Jan,
Advocate Technical Associate Global College
Opposite Ikram Medical Complex,
Near Royal Hotel Main Bazar Munda
Tehsil & P/o Munda District Dir (L)

Subject: Equivalence of Bachelor of Laws degree awarded by Federal Urdu University of Arts, Sciences and Technology, Islamabad.

Dear Sir,

With reference to your application dated February 29, 2016 on the subject, it is informed that Federal Urdu University of Arts, Sciences and Technology, Islamabad is a chartered university in public sector. The Higher Education Commission recognizes Bachelor of Laws degree held by you from Federal Urdu University of Arts, Sciences and Technology, Islamabad after 'B.Sc/14-year schooling' as equivalent to corresponding Bachelor of Laws (LLB) degree.

On the basis of year of schooling, holder of Bachelor of Laws (LL.B) degree may apply for the posts where required qualification is Master's degree in general stream involving 16-year of schooling.

It may also be noted that admission in a university for further education and determination of suitability in relation to job requirement rest with the concerned university and employing agency, respectively and this Commission has no role in such issues.

ATTESTED

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Yours faithfully


(Farrukh)

Assistant D

Accreditation & Atte

BEFORE THE PESHAWAR HIGH COURT BENCH AT
MINGORA (DAR-UL-QAZA) SWAT

W.P No 280 M of 2016.

Amjad Ali Khan son of Noor Habib Jan
Resident of Shalkandi, Tehsil Munda,
District Dir Lower.

.....Petitioner

VERSUS

1. Govt. of KPK through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (M) Dir Lower at Timergara.
4. Fazal Hakim son of Fazal Rahman presently serving at GMS Kakas, Dir Lower.
5. Muhammad Shoaib son of Khan Muhammad presently serving at GMS Bin Shahi, Dir Lower.
6. Bakhtzudin son of Majid Khan presently serving at GMS Bin Shahi, Dir Lower.
7. Murad Ali son of Noor Muhammad presently serving at GHS Shahkandi, Dir Lower.
8. Fazal Hakim son of Abdul Salam presently serving at GMS Gudar.

.....Respondents

FILED TODAY

28 APR 2016

28/4/16

ATTESTED

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WRIT PETITION

24

WRIT PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973.

Respectfully Sheweth,

The facts of the instant case are as under:-

- 1) That the petitioner is Pakistani citizen and belong to U.C Shalkandi District Dir Lower, and is Master Degree holder with ADE (Associate Degree in Education). (Copies all academic record are attached)
- 2) That the Respondent No. 3 advertised post of CT in different Schools in Dir Lower vide advertisement dated . (Copies of advertisement & list of Schools are attached as annexure "A" & "A-1" respectively)
- 3) That the petitioner applied for vacant posts advertised by the Respondent No. 3 for five Schools
1) GMS Kakas, 2) GHS Maskini, 3) GMS Binshahi, 4)

28 APR 2016

ATTESTED

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GHS Shalkandi, 5) GMS Gudar and appeared in NTS examination and got 129.63 marks, furthermore the petitioner was top on merit in the Schools mentioned except GHS Maskini. (Copy of NTS result is attached as annexure "B")

- 4) That the Respondent No. 3 issue appointment order wherein the private Respondents were appointed vide order dated 05-03-2016, although all the private Respondents are low in merit. (Copy of the appointment order is attached as annexure "C")
- 5) That the petitioner repeatedly visit the concerned office for redressal of his grievances, but the Respondent No. 3 cannot response positively.
- 6) That the petitioner have no other remedy except to file the instant writ petition on the following grounds.

GRUNDS:-

- A) That the act of Respondent No. 3 is against the rules, policy, law, hence liable to be set aside.

FILED TODAY

28 APR 2016

By  28/4/16

ATTESTED


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B) That the petitioner got degree in ADE (Associate Degree in Education) from Al-Khair University main campus Bhimber Azad Jammu Kashmir, which is recognized by Higher Education Commission Pakistan, so the Act of Respondents ignoring the petitioner in the matter of appointment is illegal, unlawful, hence, not tenable. (Copy of recognition awarded by the HEC is attached as annexure "D")

C) That it is to be mentioned here the petitioner who are ADE degree holder having preference in recruitment against the post of CT as per letter issued by the Deputy Director E & SE Govt. of Khyber Pakhtunkhwa vide dated 03-07-2013, but the concerned authority deferred the petitioner on the ground that the degree above obtained from Al-Khair University is not recognized one, although the Respondent No. 3 appointed one Majidullah, Iftikharullah, Iqbal Khan, Muhammad Bashir on the post of C.T vide appointment letter dated 05-03-2016, who also got the ADE degree from Al-Khair University, so the Act of Respondents is highly discriminatory and not sustainable in

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ATTESTED

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the eyes of law. (Copies of letter 03-07-2013 & appointment order dated 05-03-2016 is attached may be considered part of this petition)

- D) That all citizens are equal before law and entitled to equal protection under Article 25 of the Constitution of Islamic Republic of Pakistan, 1973, furthermore the Respondents having no authority to ignore the petitioner in the matter of appointment also the petitioner having privilege rights to be appoint on the post of CT according to their eligibility.
- i) That further grounds, with leave of this Honorable Court, would be raised at the time of arguments before this Honorable Court.

PRAYER

It is therefore, humbly prayed that, on acceptance of the instant writ petition, this Honorable Court may kindly issue direction to the

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28 APR 2016

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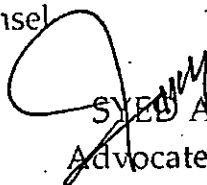
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Respondents to appoint the petitioner on any one schools mentioned above.

Any other relief which this Honorable Court deems fit and proper in the circumstances may also be very kindly granted.

Petitioner
Through Counsel


SYED ABDUL HAQ
Advocate, High Court


LIST OF BOOKS IN CONCERNED WRIT

1. Constitution Islamic Republic of Pakistan, 1973.
2. Case Law as per need..

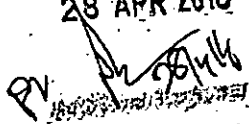

ADVOCATE

CERTIFICATE:

(As per directions of my clients) No such like Writ petition earlier has been filed by the petitioners on the subject matter before this Honorable Court.

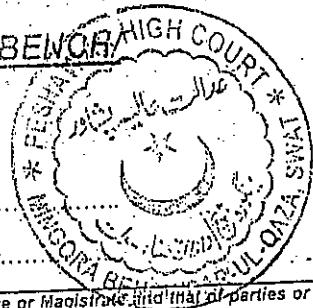

ADVOCATE

ATTESTED


FILED TODAY
28 APR 2016


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PESHAWAR HIGH COURT, MINGORA BENCH
DAR UL QAZA, SWAT
FORM OF ORDER SHEET

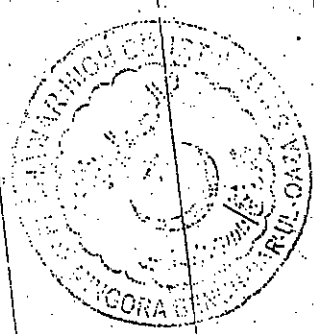


Court of
Case No. of

Serial No. of order or proceeding	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary.
1	2	3
	06.02.2017	<p><u>W.P. No. 280-M/2016.</u></p> <p>Present: Syed Abdul Haq, Advocate for the petitioner.</p> <p>***</p> <p>IKRAMULLAH KHAN, J.- By imploring and invoking the constitutional jurisdiction of this Court, Amjad Ali Khan herein the petitioner pray for:-</p> <p>"It is therefore, humbly prayed that, on acceptance of the instant writ petition, this Hon'ble Court may kindly issue direction to the Respondents to appoint the Petitioner on any one of the schools mentioned. Any other relief which this Hon'ble Court deems fit and proper in the circumstances may also be very kindly granted."</p> <p>2. At the very outset, learned counsel for the petitioner submitted copy of judgment rendered by this Court at principal seat in W.P. No. 3174-P/2016 titled as "<u>Muhammad Aqil Zahid and others</u>" vs Secretary Elementary & Secondary Education, Govt. of K.P.K &</p>

"Nawab"

ATTESTED
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others" and admitted that the issue under consideration has since been settled in terms that the degrees issued by the Al-khair University within the period from 30.4.2009 to 16.10.2011 have since been declared invalid due to unlawful affiliation granted by the said University across the Pakistan, while the degrees issued by the said University from the above-mentioned targeted period onward have been declared lawful/valid duly attested and recognized by the Higher Education Commission of Pakistan.

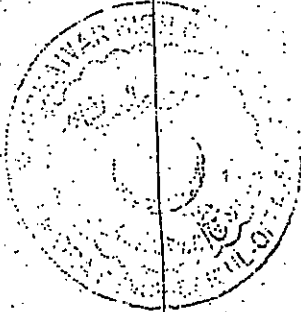
3. In the case in hand, as per ground (B) of the petition the petitioner got degree in ADE (Associate Degree in Education) from Al-khair University main Campus Bhimber Azad Jammu Kashmir which is recognized by the Higher Education Commission of Pakistan, though no photocopy of the degree has been placed on record but as per contention of learned counsel for the petitioner raised during arguments before this Court that the petitioner got his

ATTESTED
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degree from Al-Khair University on 14.10.2014, thus, his case squarely falls within the latter category as referred to above.

4. In view of the above, this writ petition is allowed and respondents are directed to appoint the petitioner accordingly on the posts applied for, but subject to verification and his merit inter se from the quarter concerned i.e. Al-Khair University.



Announced
Dt. 06.02.2017.

Sd. Ikramullah Khan
Sd. Mohammad Ibrahim Khan-J

765

Name of the party
Date of filing 13-02-17
Date of order 13-02-17
Page No. 040
Page No. 18
Date of delivery 13-02-17

Certified to be true copy.

[Signature]
Peshawar High Court, Bench at Fort-Rawalpora, Swat
Authorized Under Article 175 of the Constitution of Pakistan 1973
13/2/17

ATTESTED
[Signature]

5/2

(32)

Annex (G)

BEFORE THE PESHAWAR HIGH COURT, MINGORA
BENCH/DAR-UL-QAZA AT SWAT

C.O.C 405-P /2018

IN

W.P.NO.280-M/2016

Amjad Ali Khan S/o Noor Habib Jan
Resident of Shalkandi, Tehsil Munda,
District Dir Lower.

.....Petitioner

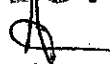
VERSUS

1. Muhammad Azam Khan, Chief Secretary Civil Secretariat Peshawar.
2. Abid Majeed Secretary E&SE, Civil Secretariat Peshawar.
3. Farid Khattak (Acting) Director Education KPK, Peshawar.
4. Hafiz Ibrahim District Education Officer (Male) Dir Lower at Timergara.

.....Respondents

**APPLICATION U/A 3/5 OF THE
CONTEMPT OF COURT ORDINANCE,
2003 FOR INITIATING CONTEMPT
PROCEEDINGS AGAINST THE
RESPONDENTS/ CONTEMNORS FOR
HAVING WILLFULLY DISOBEYED/
DISREGARDED THE ORDERS OF THIS
HON'BLE COURT DATED 06.02.2017.**

ATTESTED



Respectfully Sheweth;

1. That the applicant/ petitioner applied for the posts of CT advertised by the respondents in District Lower Dir.
2. That the applicant/ petitioner appeared in the NTS test and he was declared successful & was meritorious in the merit list.
3. That the Respondents/ contemnors denied the appointment to the applicant/ petitioner on the post of CT on the pretext that he has his ADE, from Al-Khair University. (Copy of the ADE degree of applicant/ petitioner is attached as Annex "A").
4. That feeling aggrieved the applicant / petitioner approaches this Hon'ble Court through W.P No.280-M/2016 which was allowed by this Hon'ble Court vide order/ judgment dated 06.02.2017. (Copy of the order/ judgment dated 06.02.2017 is attached as Annex "B")
5. That the applicant/ petitioner conveyed the above mentioned judgment to the respondents/ contemnors but instead of appointing the applicant/ petitioner they

ATTESTED
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(34)

blatantly refuse to honour the judgment of this court.

6. That the respondents/ contemnors issued letters to the petitioner, that they should provide their documents for on ward verification. (Copies of some of the letters are attached as Annex "C")

7. That the applicant/ petitioner approached this Hon'ble Court through COC No.76-M/2017, which was dismissed vide judgment dated 20.03.2018. (Copy of judgment is Annex "D")

8. That although while allowing the writ petition of the petitioner/ applicant clearing this Hon'ble Court directed the respondents/ contemnors that they should issued appointments orders to the petitioners & then do the verification from the quarter concern i.e. Al-Khair University but the Respondents/ contemnors are resilient not to obey the order/ judgment of this Hon'ble Court.

9. That the respondents/ contemnors willfully disobeyed/ disregarded the order/ judgment of this Hon'ble Court & thus they needs to be proceeded in accordance with law.

ATTESTED

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It may be mentioned here that in other districts the respondents Department

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issued appointment orders to other candidates after receiving the order/ judgment of principal seat of its Hon'ble.

It is, therefore, most humbly prayed that respondents/ contemnors may please be proceeded/ punished for willfully disobeyed/ disregarded the order/ judgment of this Hon'ble Court dated 06.02.2017 passed in W.P No.280-M/2016

Petitioner

Through



Barrister Kamran Qaisar
Advocate
High Court, Peshawar.

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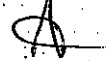
(36)

PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Date of Order or Proceedings	Order of other Proceedings with Signature of Judge.
14.11.2018	<p><u>COC No.405-P/2018 in W.P. No.280-P/2016</u></p> <p><i>Present:</i> Barrister Kamran Qaiser, counsel for the petitioner. Syed Sikandar Hayat Shah, AAG, for the respondents.</p> <p>*****</p> <p><u>QAISER RASHID KHAN, J.</u> Through the instant Contempt of Court petition, the petitioner seeks implementation of the judgment of this court dated 6.2.2017 in W.P. No.280-P/2016.</p> <p>2. On the previous date, the respondents were put on notice to positively file their reply to the show cause notice issued by this court for not implementing the judgment of this court. Today, the learned Additional Advocate General at the very outset produced a copy of the Office Order No. 12549-51, dated 9.11.2018, whereby, of course subject to the final outcome of the CPLA filed against the judgment of this court, the petitioner has been adjusted against the vacant post of CT at GHS Shalkandi. The learned counsel for the petitioner</p>

ATTESTED




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is satisfied with the adjustment order of the petitioner and does not press this petition.

3. Accordingly, this COC having achieved its object, stands disposed of.


Senior Puisne Judge


Judge

ATTESTED



Annex (H)

Consequent upon the decision of Peshawar High Court Darul Qaza Bench Swat W.P 280-M/2016 Dated 06/02/2017. One Mr. Amjad Ali Khan petitioner of W.P No. 280-M/2016 who was not recommended by the departmental selection committee due to his non equivalency certificate of L.L.B degree and the post was kept deffer till its provision. Meanwhile the petitioner submitted his equivalency certificate but the issue of Al-Khair University degree/diploma Holder aroused and the petitioner diploma was also from Al-Khair University so not considered for appointment. The petitioner file a writ petition No. 280-M-2016 which was decided on 06/02/2017. the department applied for CPLA in the August Supreme Court of Pakistan and the petitioner file a C.O.C No 405-P/2018. To avoid any in conveniences the petitioner is appointed till the decision of August Supreme Court of Pakistan.

S.No	Name	F/Name	Address	School	Remarks
1	Amjad Ali Khan	Noor Habib Jan	Village Shaikandi Munda, Dir Lower	GHS Shalkandi	A.V.P

Terms and Conditions

1. No TA/DA is allowed.
 2. Charge report should be submitted to the office concerned within 30 days.
 3. Appointment is purely on temporary and ad hoc basis for one year period w.e.f 05-11-2018 to 05-11-2019
 4. His certificates and documents must be verified from the concerned authorities, and if found bogus his appointment shall be cancelled.
 5. His service is liable to termination on one month's prior notice from either side. In case of resignation without notice his one moth pay/allowance shall be forfeited to the government treasury.
 6. Pay shall not be drawn until and unless a certificate issued by this office to the effect his documents have been verified.
 7. Health & age certificate should be produced from the medical superintendent before taking over charge.
 8. He will be governed by such rules and regulations as may be issued from time to time by the government.
 9. His service shall be terminated at any time in case his performance is found unsatisfactory during his service period. In case of misconduct, may shall be proceeded against under the relevant rules & regulations announced from time to time.
 10. His appointment is ad hoc and school based. He shall have to serve at his place of posting and his service is not transferable to any other station.
- Errors and omissions will be acceptable within specified period.

[Signature]
District Education Officer (M)
Dir Lower at Timergara

- Copy of the above is forwarded to
1. Registrar Peshawar High Court Darul Qaza Swat.
 2. District Account Officer
 3. Mr. Amjad Ali Petitioner





[Signature]
District Education Officer (M)
Dir Lower at Timergara.

ATTESTED

Annex (I)

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Page 1 of 20

	OFFICE OF THE DISTT: EDUCATION OFFICER (M) DISTRICT DIR LOWER		Fax.#: 0945-9250081
			H. 9250082
 deomalodirlower@gmail.com		 @DEOMaleDirLower	 District Education Officer MaleDir-Lower

Notification

Under the provision of the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022 (Khyber Pakhtunkhwa Act No.XLI of 2022), the services of the following Certified Teachers BPS-15 appointed on Adhoc/Contract basis w.e.f 08/03/2017, are hereby regularized in Teaching Cadre on the terms and conditions given below with effect from the date of their initial appointment till the commencement of the Act ibid:

CT B-15/2015 (Court Case)

CT BPS-15										
S#	Roll #	Name Of Teacher	Father Name	CNIC	D.O.B	T: Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
1.	3911 0032 2	AMJAD ALI KHAN	NOOR HABIB JAN	15304- 6713807-5	20/05/1963	129.63	GHSS MUNDA	court order from 2015 NTS	12549-51 dated 09/11/2018	

CT B-15/2017-18

CT BPS-15										
S #	Roll #	Name Of Teacher	Father Name	CNIC	D.O.B	T: Marks	School	Adv.No and Date	Apptt Order No and Date	Extension Order No and Date
2.	2415 0009 91	SAJID ALI	UMAR GUL	15305- 7990479-1	10/05/1990	153.45	GMS KOTKAI SHAHI KHEL	INF(P)6741 dated 24.12.2017	13391- 13402 dated 26/12/2018	2855-61 dated 07/04/2020 & 1883-89 dated 08/03/2021
3.	2515 0012 33	ANWAR ZEB	FAZAL WAHID	15307- 0278941-9	20/06/1992	145.33	GHS PUKHTANO KHADAGZAI	INF(P)6741 dated 24.12.2017	13391- 13402 dated 26/12/2018	2855-61 dated 07/04/2020 & 1883-89 dated 08/03/2021
4.	2415 0010 19	SHAHID KHAN	MIAN SHER	15302- 9526656-3	10/04/1995	143.91	GMS QANDARAY	INF(P)6741 dated 24.12.2017	13391- 13402 dated 26/12/2018	2855-61 dated 07/04/2020 & 1883-89 dated 08/03/2021

15-12-22
ATTESTED

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200.	2107 97	NADEEM KHAN	SHAH ZAREEN	15302- 1042206-9	06/03/1998	136.901	GHS BABAGAM	INF(P)6100/ 2021 dated 31/12/2021	6512-52 dated 05/09/2022
201.	2110 05	HADI KAMAL	MUHAMMAD IBRAHIM	15302- 1880377-9	02/11/1998	136.854	GSSHSS OUCH	INF(P)6100/ 2021 dated 31/12/2021	6512-52 dated 05/09/2022
202.	2176 18	INTIKHAB ALAM	ALI BAKHT	15307- 7228661-9	28/03/1990	136.676	GHSS KHANPUR	INF(P)6100/ 2021 dated 31/12/2021	6512-52 dated 05/09/2022
203.	2153 71	GOHAR AYUB KHAN	MOHAMMAD AYUB KHAN	15304- 8486689-1	01/02/1986	136.584	GMS MANOGAY	INF(P)6100/ 2021 dated 31/12/2021	6512-52 dated 05/09/2022
204.	2131 17	KHAN SHAHZADA	JANAT GUL	15303- 3524965-9	01/04/1999	136.529	GHSS SAMARBAGH	INF(P)6100/ 2021 dated 31/12/2021	6512-52 dated 05/09/2022
205.	2163 22	IRFAN ULLAH	RAHMANI GUL	15306- 3189842-9	25/04/1992	136.297	GHS DHERI KASHMIR	INF(P)6100/ 2021 dated 31/12/2021	6512-52 dated 05/09/2022

Terms and Conditions:-

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructor and Doctors) Regularity Act, 2011, and such rules and regulation as may be issued from time to time by Government.
2. Their services will be considered regular and they shall be eligible for pension/deduction of GP Fund in term of Khyber Pakhtunkhwa Civil Servant Act, 1973, as amended in 2013, however, the teachers appointed on or after 07/06/2022 shall be dealt with Section (2)(2) of the Khyber Pakhtunkhwa (Amendment) Act, 2022.
3. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
4. They shall possess the same qualification and experience required for the subject post on regular basis as specified in Section (3)(a) of the Act.
5. Their regularization shall not affect the service promotion quota of all service cadres as specified in Section (3) (c) of the Act.
6. They shall be entitled for seniority and pay from the date of initial appointment on Adhoc/Contract basis as specified in Section (3) (d) of the Act.
7. They shall perform duty for at least three years from the date of taking over charge where they were appointed/posted initially.
8. The regularization shall not be in favor of those teachers who have not taken over charge, remained absent from duty and resigned from service.

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[Signature]
15-12-22

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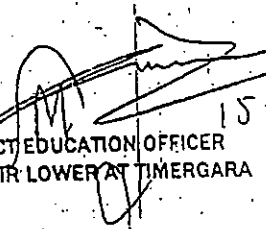
9. The Teacher, Regularized through: notification, shall be confirmed after successful completion of In-service mandatory training as specified in their Service Rules notified vide notification No SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 07/03/2018 within two consecutive attempts otherwise the appointment orders of the candidates failed to qualify induction program within two consecutive attempts shall be considered as withdrawn/cancelled from the date of declaration of result of the second attempt made in the induction program.

(MUHAMMAD AMIN)
DISTRICT EDUCATION OFFICER
MALE DIR LOWER AT TIMERGARA

Endst: No. 11877-12099 Dated Timergara the: 15 /12/2022

Copy of the above is forwarded to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Dir Lower.
3. District Account Officer Dir Lower.
4. District Monitoring Officer EMA Dir Lower.
5. Principal/Headmaster concerned.
6. The Dealing Assistant Local Office.
7. The candidates concerned.
8. Master File.


15-12-22
DISTRICT EDUCATION OFFICER
MALE DIR LOWER AT TIMERGARA

ATTESTED



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BILL

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to provide for the appointment and regularization of the services of certain teachers appointed on ad-hoc basis in the Elementary and Secondary Education Department in the Province of Khyber Pakhtunkhwa

WHEREAS, it is expedient to provide for the appointment and regularization of the services of certain teachers appointed on ad-hoc basis in the Elementary and Secondary Education Department in the Province of Khyber Pakhtunkhwa, in the public interest;

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows:

1. **Short title, application and commencement.**---(1) This Act may be called the Khyber Pakhtunkhwa Teachers (Appointment and Regularization of Services) Act, 2022.

(2) It shall apply to all the teachers, as defined in clause (d) of sub-section (1) of section 2 of this Act.

(3) It shall come into force at once.

2. **Definitions.**--- (1) In this Act, unless the context otherwise requires,-

- (a) "Government" means the Government of Khyber Pakhtunkhwa;
- (b) "law or rules" means the law or rules, for the time being in force, governing the selection and appointment of civil servants;
- (c) "post" means a post of teacher in the Elementary and Secondary Education Department; and
- (d) "teachers" mean duly qualified persons, who are appointed as Primary School Teachers, Certified Teachers, Drawing Masters, Physical Education Teachers, Theology Teachers, Arabic Teachers, Qari/Qaria Teachers, Certified Teachers IT, Primary Teachers and Secondary School Teachers, having different pay scales, in the Elementary and Secondary Education Department, on ad-hoc basis, through National Testing Service, but does not include the teachers engaged on work charge basis or who are paid out of contingencies or engaged by Parent Teachers Council.

ATTESTED

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(2) The expressions "ad-hoc appointment" shall have the same meaning as is respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. **Regularization of services of teachers.**---(1) Notwithstanding anything contained in any law or rules, for the time being in force, all the teachers, who are holding various posts from 08.03.2017 till the commencement of this Act,

Deputy Legislation Officer
Government of Khyber Pakhtunkhwa
Law Department

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shall be validly appointed, on regular basis, with immediate effect; provided that,-

- (a) they possess the same qualification and experience required for a regular post;
- (b) they have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground, before the commencement of this Act;
- (c) the service promotion quota of all service cadres shall not be affected; and
- (d) they shall be entitled for seniority and pay from the date of their initial appointment on ad-hoc basis.

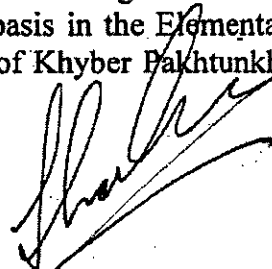
(2) The services of the teachers shall be deemed to have been regularized only on the publication of their names in the official Gazette.

(3) The teachers, whose services are regularized under this Act, shall, in lieu of pension and gratuity, be entitled to participate in the Contributory Provident Fund, as provided in sub-section (2) of section 19 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) and rules made thereunder.

4. **Overriding effect.**--- Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules, to the extent of inconsistency to this Act, shall cease to have effect.

STATEMENT OF OBJECTS AND REASONS.

It is desirable to provide for the appointment and regularization of the services of certain teachers, appointed on ad-hoc basis in the Elementary and Secondary Education Department in the Province of Khyber Pakhtunkhwa, in the public interest. Hence, this Bill.



MINISTER-IN-CHARGE

Peshawar,
dated the

/ / 2022

ATTESTED



Deputy Legislating Officer
Government of Khyber Pakhtunkhwa
Law Department

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Annex (J)

BEFORE THE WORTHY DIRECTOR
ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR

DEPARTMENTAL APPEAL/ REPRESENTATION

APPEAL AGAINST THE ORDER/ NOTIFICATION DATED 15.12.2022, WHEREBY THE SERVICES OF APPELLANT WERE REGULARIZED W.E.F. 08.03.2017, DESPITE THE FACT THAT HIS APPOINTMENT WAS MADE IN LIGHT OF ADVERTISEMENT ISSUED IN THE YEAR 2015/2016 AND APPOINTMENTS IN LIGHT OF THE ADVERTISEMENT WERE MADE ON 05.03.2016, THEREFORE, APPELLANT IS ALSO ENTITLED FOR HIS REGULARIZATION AND ALL BENEFITS W.E.F. 05.03.2016

Sir:-

- 1) That appellant is bonafide and peaceful citizen of the country and hails from U/c Shalkandi, District Dir Lower, equipped with qualification of M.A with ADE (Associate Degree in Education).
- 2) That the worthy District Education Officer (M), Dir Lower at Timergra advertised certain posts of C.T in different Schools of Dir Lower, to which the appellant being qualified applied for the same on 05 different Schools.
- 3) That appellant appeared in the written test and secured 129.63 marks and was placed at the top of merit in the Schools except GHS Maskini, but despite being eligible, qualified and being on top of merit list, appellant was deferred from appointment with the remarks "LLB, MA Equivalence 15 days (about 02 weeks)" and instead low in merits were appointed by respondent No.3 vide its order dated 05.03.2016.
- 4) That the appellant provided the LLB Equivalence certificate from HEC within 05 days to respondent No.3, but of no avail. Hence, being aggrieved and having no other remedy, the appellant approached to the Hon'ble Peshawar High Court, Mingora Bench and filed W.P No.280-M/2016, which was allowed by the Hon'ble High Court in favour of appellant vide judgment dated 06.02.2017. But despite the clear cut directions passed by the Hon'ble High Court, the appellant was not appointed, hence he was constrained to file COC No.405-

ATTESTED



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P/2018, which was disposed-off vide order dated 14.11.2018, because during pendency of Contempt Petition, respondent No.3 appointed appellant vide Office Order No.12549-51 dated 09.11.2018.

- 5) That thereafter, vide Notification/ order dated 15.12.2022 the regularized the services of Certified Teachers (BPS-15) appointed on Adhoc/ Contract basis w.e.f. 08.03.2017, despite the fact that advertisement was made way back in the year 2015-16 and appointments were also made to other candidates in the year 2016 i.e. 05.03.2016, therefore, appellant is also entitled to be regularized w.e.f. 05.03.2016.
- 6) That being aggrieved the appellant approached the concerned authority seeking his regularization from the date when other employees were appointed in light of the advertisement i.e. 05.03.2016, but of no avail.
- 7) That being aggrieved and having no other remedy, the appellant now approaches before your honor on the following grounds:-

GROUND.

- A. That the impugned order dated 15.12.2022 to the extent of non-regularizing the services of appellant from date when other employees were appointed in light of the advertisement i.e. 05.03.2016 is illegal, unlawful, without lawful authority and ineffective upon the rights of appellant, therefore, is liable to be modified to this extent.
- B. That it is not evident on record that the post of C.T was advertised way back in the year 2016 and the appellant runs from pillar to post seeking his appointment on the post of C.T and lastly he was appointed on 09.11.2018 in light of Court order.
- C. That due to non-regularizing/ not treating the appointment order of petitioner w.e.f. 05.03.2016, he has been deprived of his seniority and other benefits as are enjoyed by other employees who were appointed in light of the same advertisement.
- D. That seniority of the appellant has been affected due to act of respondent No.3, therefore, he cannot be deprived of the same.
- E. That appellant has not been treated in accordance with law which is violation of Article 4 & 25 of the Constitution of Islamic Republic of Pakistan, 1973.

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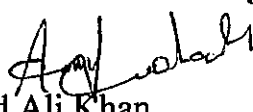
(46)

It is therefore, humbly prayed that on acceptance of this appeal, the Notification dated 15.12.2022 may graciously be modified to the extent that the respondents be directed to regularize the services of appellant from the date of appointment of other employees i.e. 05.03.2016, because the post in question was advertised in the year 2016, but appellant was not appointed and instead low in merit then appellant were preferred, and thereafter the appellant was appointed on 09.11.2018 in light of order/ judgment passed by the Hon'ble Peshawar High Court, Peshawar, therefore, is entitled to be regularized from the date when other employees were appointed on 05.03.2016 with all back benefits and seniority.

Any other relief which this hon'ble court deems appropriate in the circumstances of the case though not specifically asked for may kindly also be granted.

Dated:

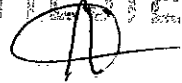
Appellant


Amjad Ali Khan
S/o Noor Habib Jan
R/o Shalkandi, Tehsil Munda,
District Dir Lower.
Certified Teacher (C.T) BPS-
15, GHSS Munda, District Dir
Lower
Cell No.0343-9195344 &
0300-0923189

2nd appeal Dirory No. 6102

Dated: 21/07/2023

ATTESTED



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حضور جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع ویرپائین بمقام تیرگرہ

درخواست بھرا و صدور حکم مابت اپیل کرنے من سائیل برائے نام سی ٹی سینارٹی

میرٹ لسٹ شامل کرنے بوجوہات ذیل

من سائیل حسب ذیل عرض رساں ہے

جناب عالی!

(1) یہ کہ من سائیل / امجد علی خان ولد نور حبیب جان CT گورنمنٹ ہائی سیکنڈری سکول منڈا Endst No. & Date

12549-51/09-11-2018 ہے۔ بذریعہ تقرری COC No. 405-P-18 ہوا۔

(2) یہ کہ من سائیل کے اصل آرڈر تاریخ 05-03-2016 ہے۔ یہ کہ سائیل نے مشرق اخبار 28-08-2015 اشتہار

INF(P) 3922 شائع ہوا۔ 2015 NTS اسٹ مارکس 129-63 ہے۔

(3) یہ کہ درخواست کیساتھ ضروری کاغذات لف ہے (Court order+Add+Missing)

(4) یہ کہ سائیل کا نام امجد علی خان ولد نور حبیب خان (Math-Physics) CT گورنمنٹ ہائی سیکنڈری سکول منڈا کو 2016

سی ٹی سینارٹی لسٹ میں شامل کرنا عین قانونی ہے۔ اور مٹی برائے انصاف ہے۔

بحالات بالا استدعا ہے کہ منظوری درخواست بذی سائیل کا نام بمورخہ 05-03-2016 سے

سینارٹی لسٹ CT میں شامل کرنے کے ذریعہ احکامات صادر فرمائیں۔

1st Appeal Diary No. 1703

07/08/2021

ATTESTED

العبد

امجد علی خان ولد نور حبیب جان

2nd appeal Diary No. 6102

Dated: 21/07/2023

CT(M-P) GHHS Munda

Dir Lower