

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal No. 503/2015

Date of Institution ... 27.05.2015

Date of Decision ... 12.10.2017

Fazal Sheer son of Zarif Khan posted as (Senior Qari BPS-15) at Government High School, Kass Korona District Mardan. ... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary, E&SE, Peshawar and 2 others. ... (Respondents)

MR. AMJAD ALI, ... For appellant
Advocate

MR. KABEERULLAH KHATTAK, ... For respondents.
Addl. Advocate General

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN
MR. AHMAD HASSAN, ... MEMBER

JUDGMENT

NIAZ MUIHAMMAD KHAN, CHAIRMAN.- This judgment shall dispose of the instant service appeal as well as connected service appeal No. 504/2015 Muhammad Bilal, No. 505/2015 Sher Ali, No. 506/2015 Ahmad Ali, No. 507/2015 Asad Ullah, No. 508/2015 Khairul Wara, No. 509/2015 Muhammad Ayaz, No. 510/2015 Muhammad Hayat, No. 511/2015 Muhammad Ayub, No. 512/2015 Asadur Rahman, No. 513/2015 Iftikhar Hussain, No. 514/2015 Muhammad Darvesh, No. 515/2015 Muhammad Iqbal, No. 516/2015 Mustaqim Shah, No. 517/2015 HJazrat Hussain, No. 518/2015 Yahya Habib, No. 519/2015 Shah Faisal No. 520/2015 Badar Munir, No. 521/2015 Sharif Gul, No. 522/2015 Fatal Hadi, No. 523/2015 Mudassir Shah, No. 524/2015 Muhammad Farooq, No. 525/2015 Muhammad Rasool, No. 526/2016 Dildarud Din, No. 527/2015 Kifayatur

Rahman, No. 528/2015 Muhammad Ilyas, No. 529/2015 Gul Muhammad, No. 530/2015 Sayyed Muhammad Zakriya, No. 531/2015 Farhan, No. 532/2015 Muhammad Ibrahim, No. 533/2015 Ishaq Ali, No. 534/2015 Maab Ahmad, No. 535/2015 Naiz Muhammad, No. 536/2015 Shams ul Arifeen, No. 537/2016 Sulaaiman, No. 538/2015 Afsar Ali, No. 539/2015 Abdul Zahoor, No. 540/2015 Habib Ullah, No. 541/2015 Ihsan Ullah, No. 542/2015 Muhammad Ikram, No. 543/2015 Saleemur Rahman, No. 544/2015 Muhammad Abdullah, No. 545/2015 Hussain Ali, No. 546/2015 Zubair Ali, No. 547/2015 Muhammad Zubair, No. 548/2015 Asad Ali, No. 549/2015 Ali Nasir, No. 550/2015 Sahib Zada Aamir Sultan and No. 551/2015 Mazhar-ul-Hassan as in all the appeals common questions of law and facts are involved.

2. Arguments of the learned counsel for the parties heard and record perused.

FACTS

3. The appellants through these service appeals seek the relief that being Qari serving in BPS-12 may also be upgraded to BPS-15 like Theology Teachers, Arabic Teachers, Certified Teachers and Drawing Masters. The reason given by the appellants is that they are equally qualified with all those mentioned above and are also teaching in the High Schools. That by not upgrading their posts to BPS-15 is a clear discrimination. The appellant approached the Worthy Peshawar High Court and the Worthy High Court vide judgment dated 22.1.2015 dismissed all the appeals as withdrawn on the ground of jurisdiction in view of Article 212 of the Constitution of Islamic Republic of Pakistan. Thereafter, the appellants filed joint departmental appeal on 10.2.2015 which was not responded to and thereafter the present service appeals were filed on 27.5.2015.

ARGUMENTS.

4. The learned counsel for the appellant argued that the appellants having equal qualification with all others mentioned in facts part of this judgment and also teaching in High Schools are entitled for BPS-15 and their posts may also be upgraded to BPS-15.


5. On the other hand, the learned Addl. Advocate General argued that there is no original/appellate final order nor there is any departmental appeal against any original order. He also argued that in view of the judgment reported as 2017-SCMR-890, the august Supreme Court of Pakistan held that the matter of upgradation squarely falls outside the ambit of this Tribunal.

CONCLUSION.

6. All the appeals are aimed to get their posts upgraded to BPS-15. In view of the judgment reported 2016-SCMR-859, wherein their Lordship has held that in such matter the Service Tribunal has got no jurisdiction as the upgradation is not similar to promotion and does not fall within the terms and conditions of a civil servant. The same judgment has further been endorsed by another judgment of the august Supreme Court of Pakistan in a judgment reported as 2017-SCMR-890. Additionally, in view of a famous judgment in case of *IA Sharwani* reported as 1991-SCMR1041 this Tribunal lacks the jurisdiction on the basis of general notifications giving benefit to some civil servants.

7. Consequently all the appeals are dismissed as this Tribunal lacks the jurisdiction. However, the appellants may resort to the proper forum with all just factual and legal exceptions. Parties are left to bear their own costs. File be consigned to the record room.


(AHMAD HASSAN)
MEMBER


(NIAZ MUIHAMMAD KHAN)
CHAIRMAN

ANNOUNCED
12.10.2017

05.04.2017


Counsel for the appellant and Mr. Adeel Butt, Addl: AG for the respondents present. Argument could not be heard due to incomplete bench. To come up for final hearing on 27.07.2017 before D.B.


Chairman

27.07.2017

Clerk to counsel for the appellant and Addl: AG for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourned . To come up for arguments on 12.10.2017 before D.B.

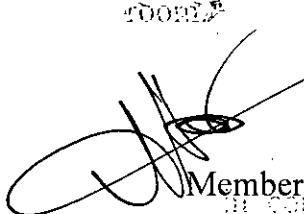

(Ahmad Hassan)
Member

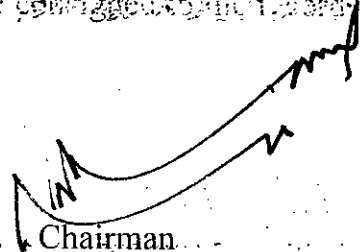

(M. Hamid Mughal)
Member

12.10.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. Advocate General for the respondents present. Arguments heard and record perused.

This appeal is dismissed as per our detailed judgment of today. Parties are left to bear their own costs. File be consigned to the record room.


Member


Chairman

ANNOUNCED by Government of Khyber Pakhtunkhwa
12.10.2017
through Secretary E&SE, Peshawar and others. Parties are left to bear their own costs. File be consigned to the record room.

28.03.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Assistant AG for respondents present. Para-wise comments on behalf of respondents No. 1 and 2 submitted. The learned Assistant AG relies on the same on behalf of respondent No. 3. The appeal is assigned to D.B for rejoinder and final hearing for 14.7.2016.


Chairman

14.07.2016

Appellant in person and Additional AG for the respondents present. Rejoinder not submitted and requested for further time to file rejoinder. To come up for rejoinder and arguments on

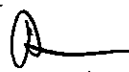
25-11-16


MEMBER


MEMBER

25.11.2016

Appellant in person and Addl. AG for respondents present. Rejoinder submitted which is placed on file. To come up for arguments on 05.04.2017 before D.B.


(ABDUL LATIF)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

4
26.06.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving in the High School as Qari. That previously the scale of the appellant was equal with that of TT, AT and DM etc but vide impugned notification dated 11.7.2012 other teachers are given up-gradation to BPS-15 while the appellant was ignored and discriminated against despite the facts the he was entitled to alike treatment. That against the impugned notification and decision appellant preferred departmental appeal on 10.2.2015 which was not responded and hence the instant service appeal on 27.5.2015.

That since financial benefits are involved as such limitation would not come in the way of the appellant.

Points urged need consideration. Admit, subject to all legal objections. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 1.10.2015 before S.B.


Chairman

01.10.2015

Appellant in person, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 2.12.2015 before S.B.


Chairman

02.12.2015

Appellant in person, M/S Khurshid Khan, SO, Hameed-ur-Rehman, AD (lit.) and Javed Shah, Litigation Officer alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 28.3.2016 before S.B.


Chairman




Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 503/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	27.05.2015	<p>The appeal of Mr. Fazal Sher presented today by Mr. Amjid Ali Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	5-6-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>9-6-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>
3	09.06.2015	<p>None present for appellant. Notice be issued to counsel for the appellant for preliminary hearing for 26.6.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No. 503 /2015

Fazal Sher

.....Appellant


VERSUS

Govt of KPK through Secretary E&S and etc

.....Respondents

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2	Copies of Qualification.	A	9-16
3	Copies of pay roll and appointment letter / Orders.	B	17-22
4	Notification dated 26/01/2008	C	23
5	Copy of notification of 1992 and 26/06/2012.	D	24-28
6	Copy of notification of 1991.	E	29-30
7	Copy of minutes of the meeting.	F	31-33
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Appellant

Through


Amjad Ali Advocate

Supreme Court of Pakistan

Cell:0321-9882434

①

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 503 /2015

A.W.F. Province
Service Tribunal
Diary No. 555
Dated 27-5-2015

Fazal Sheer S/O Zarif Khan Posted as (Senior Qari BPS-15) At Govt High School
Kass korona, District Mardan.Appellant

VERSUS

1. Govt of Khyber Pakhtunkhwa through Secretary elementary & Secondary Education (E&S) Education Department, Civil Secretariat, Peshawar.
2. Director Elementary & Secondary education (E&S), Department, Khyber Pakhtunkhwa, Dargari Garden Peshawar.
3. Distict Education Officer (E&S) District Mardan.

.....Respondents

SERVICES APPEAL U/S 4 OF SERVICE TRIBUNAL ACT,1974 AGAINST
NOTIFICATION DATED 11/7/2012 AND DEPARTMENTAL APPEAL DATED
10/2/2015 UNRESPONDED AFTER LAPSE OF 90X DAYS.

Respectfully Sheweth:-

Filed to-day That facts pertaining to this appeal are as under:-

Registrar
27/5/15

- 1) That appellant is equipped with qualification such as Qirat Sanad, Shahdatul Aalamia, BA, MA, B.Ed, M.Ed.
- 2) That the appellant was appointed against the post of Qaries in Government High Schools, Mardan & Swabi District of Khyber Pakhtunkhwa.

appointment letters/ orders are attached as Annexure "B" respectively).

- 3) That respondents are taking duty from the appellant like other computer, SET Teachers.
- 4) That appellant was appointed initially in BPS-7 in different years by the competent authority and presently serving in different High Schools of the province.
- 5) That after the appointment of the appellant his basic pay scale up graded to BPS-09, 10, 12, 14, 15 according to their qualifications and experience by different orders of the competent authority in different time. (In this respect notification dated 26.01.2008 is attached as Annexure "C")
- 6) That for BPS of Teachers the 1st Rules were framed in the year 1981, then 1991 wherein there are three basic categories of teachers.
 - a. Primary school Teachers
 - b. Middle School Teachers
 - c. High School Teachers

(Copy of notification of 1990 is Annexure "D" and notification of 1991 is Annexure "E").
- 7) That according to the decision of the Govt. of Khyber Pakhtunkhwa a meeting of respondents was held on 01.06.2012, under the Chairmanship of respondent No.05 for up gradation of the basic pay scales of all teachers of province. (Copy of minutes of the meeting is attached as Annexure "F")

- 8) That in the light of above stated meeting of respondents the BPS of all the teachers in Province working in different categories/cadres were up graded by the order of respondent No.1 vide notification No.SO(BQA)1-18 E QSE 2012 dated 11.07.2012. (copy of the notification is attached as Annexure "G")
- 9) That the above stated notification was then circulated to all the Executive District Officer, in Khyber Pakhtunkhwa by the order of respondent No.2. (Copies of the notification of respondent No.2 and sanction order of EDO, Mardan/Swabi dated 11-9-2013 are attached as Annexure "H" and "I" respectively)
- 10) That according to the above stated notification, the post of Qari has been up graded to BPS-12, whereas the post of the theology teacher (T.T) was up graded to BPS-15, who possess equal or less the same qualification.
- 11) That appellant filed appeal dated 10-2-2015 to respondent that appellant treated as par with Theology Teacher/Arabic Teacher and other High School Teachers in matter of grade as since 1981, they were in the same grade being High School Teachers, but remained un-responded. (Copy of departmental appeal is Annexure "J").
- 12) That impugned notification dated 11.07.2012 regarding the up gradation to the extent of the post of Qaries is illegal, void, and discriminatory as T.T. are placed in BPS-15 and appellant in BPS-12, thus clear-cut violation of articles 4 and 25/27 of the Constitution of Islamic Republic of Pakistan, 1973.

- (4)
- 13) That appellant filed writ petition wherein respondents filed comments but writ petition was dismissed for being service matter. (Copy of writ comments order dated 22.01.2015 is Annexure "K")
- 14) That there is no other officious remedy available to the appellant against the illegal act/order of respondents, therefore invoking jurisdiction of this Hon'ble Tribunal on the following amongst others grounds.

GROUND:

- A. Because the act of respondent is discriminatory, illegal, and void, hence untenable under the law.
- B. Because according to the impugned notification all the posts of different categories and cadres have been up graded to BPS-15 and 16 in all the Govt: High Schools in Province except the post of the appellant, which has been up graded to BPS-12 instead of BPS-15 and BPS-16.
- C. Because before the up gradation of basic pay scales of the impugned notification of the respondent No.1, the teachers of theology and the appellant was serving in the same different grades, which is also clear from the impugned notification, therefore, depriving of appellant from his legal/due rights in not only illegal, but also discriminatory.
- D. Because in impugned notification, respondent have not given any legal justification for not upgrading the post of the appellant equivalent to Theology Teacher (T.T) nor any criteria has been mentioned in this regard.
- E. That appellant is not only Hafiz-ul-Quran, but also possess equal or more qualification then the teachers of

theology in the relevant subject i.e. Islamiyat and beside possess professional Teaching Degrees like B.Ed, M.Ed as well.

- F. Because all the citizens of Pakistan are equal before the law and they are entitled to equal protection of law, hence impugned notification in respect of up gradation to the post of Qaries is also against Article 4 of Constitution of Islamic Republic of Pakistan, 1973.
- G. Because according to their lordship Superior Court of the country "All persons placed in similar circumstances must be treated alike" in famous case of I.A Sherwani 1991 SCMR 1041.
- H. Because impugned notification of respondents No.1, to the extent of appellant's right is clear cut violation of the law/ principles settled by the Superior Courts, thus liable to be declared null and void, without lawful authority ultra vires to the extent of not granting BPS-15 and 16 and granted to other High Schools Teachers.
- I. Because appellant has been discriminated thereby violated Articles 25/27 of Constitution of Islamic Republic of Pakistan, 1973.
- J. Because appellant is performing same duties upto come duration to the same classic of students in the same High School, possessing same qualification like T.T., A.T, SET, then placing T.T., A.T. SET in grade 15, 16, who were earlier in the same grade as appellant and depriving appellant of the same is clear discrimination.
- K. Because it is not reasonable classification and is clear disparity.

- L. Because no grounds for declaring these classes can be forwarded by respondents.
- M. Because Article 35 and Superior Courts including this Hon'ble Court presses equal social standards/financials.
- N. Because appellant and T.T/AT are purchasing same commodities like flour, pulses, ghee, electricity, gas, phone from the same market at the same rate.
- O. That instant relief is of upgradation for treating appellant at par with other teachers teaching in High Schools like theology teachers, Arabic teachers, drawing masters, physical education teacher, there are three categories of schools.

<u>S.No.</u>	<u>Category</u>	<u>Teachers</u>
I.	Primary Schools	PST
II.	Middle School	C.T
III.	High School	SET, AT, TT, DM, PET, Qari

So, even CT teachers who are teaching in Middle Schools are granted BPS-15 with 1/3rd BPS-16. Petitioners are placed in category of primary school teachers which is totally illegal, against all norms of justice.

- P. Because post of Qari is only available in High School and when Middle School is upgraded to High, then Qari post is sanctioned.
- Q. Because D.M is teaching Drawing, which is an optional subject.

- (7)
- R. Because P.E.T. is teaching Drill/ Scout, which is too optional.
 - S. Because A.T. is teaching Arabic, which is optional subject.
 - T. Because Qari teachers are teaching other subjects, beside Qirat from 8th upto 10th class.
 - U. Because Qirat is only taught to 9th and 10th classes.
 - V. Because any other grounds, which has not been taken specifically in the instant appeal may be argued with the permission of this Hon'ble Tribunal at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this appeal, notification dated 11.07.2012 issued by respondents may please be modified by treating appellant at par with Theology Teacher/Arabic Teacher i.e. BPS-15 as basic and BPS-16 as 1/3rd in Selection grade/promotion as both are teaching to the same High School classes and were treated alike in past notifications of pay scales. It is further prayed that appellant may please be treated at par with other teachers of High Schools like Arabic Teachers physical education Teacher, Drawing Masters and Certificate Teachers etc. in matter of upgradation/promotion.

Any other relief deemed appropriate in the circumstances of the case, may also be graciously granted in favour of petitioners.

(8)

Saral
Appellant

Through

Amjad Ali
Advocate
Supreme Court of Pakistan
At Mardan

(Signature)

AFFIDAVIT

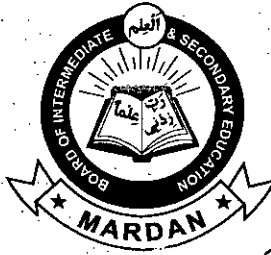
I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Saral
Deponent

(Signature)
Saeed Usman
Advocate
Oath Commission
Date: 10/15/22
Distt: Court Mardan

S.No. 32484
Roll No. 46268
Group Science

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



Board of Intermediate and Secondary Education

Mardan N.W.F.P. Pakistan
SECONDARY SCHOOL CERTIFICATE
SESSION 2004 - ANNUAL

This is to certify that FAZAL SHER Son of ZARIF KHAN

and Student of Govt. High School No. 1 Bicket Gunj Mardan has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education Mardan, held in March/April, 2004 as a Regular Candidate. He obtained 598 Marks out of 850 and has been placed in Grade A representing Excellent. The Candidate passed the following subjects:

1. English 2. Urdu 3. Islamiyat (Comp) 4. Pakistan Studies 5. Mathematics 6. Physics 7. Chemistry 8. Biology

His date of birth according to admission form is (in Figures) 01-04-88 (in Words) 1st April N/H Eighty Eight.

Rashidul
Asstt. Secretary

Secretary

This Certificate is issued without alteration or erasure.

S. No. 36145

Roll No. 27326

Group. Pre- Engineering



Board of Intermediate and Secondary Education
Mardan N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION

SESSION 2006 - ANNUAL

This is to certify that FAZAL SHER son of ZARIF KHAN

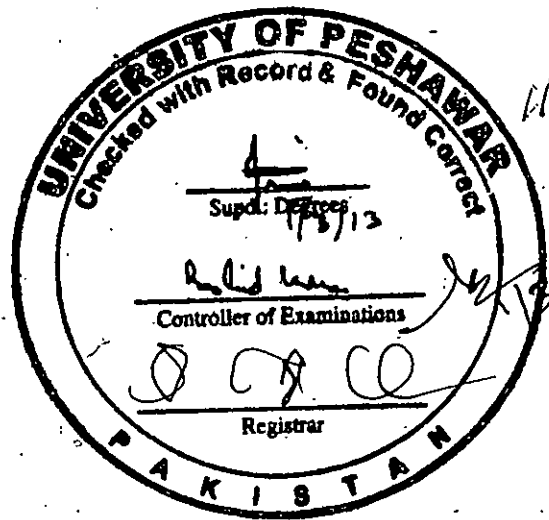
and Student of Govt. Post Graduate College Mardan. Registration No. 267-B/M-2004

has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Mardan held in May/June, 2006 as a Regular candidate. He Obtained 751 Marks out of 1100 and has been placed in Grade B Representing Very Good. The Examination was taken as a whole.

Rashidul.
Asstt. Secretary

Sherin 14
Secretary

This certificate is issued without alteration or erasure.



PREPARED BY.....
CHECKED.....
DATE.....

18/5/11

Serial No. 000408

Reg. No. ^{10-AWKUM-PM-445}

Roll No. 7243

Abdul Wali Khan University

Mardan, Pakistan



The University in recognition of the fulfilment of prescribed requirements has conferred upon
Mr. / Ms. FAZAL SHER Son / ~~Daughter~~ of ZARIF KHAN

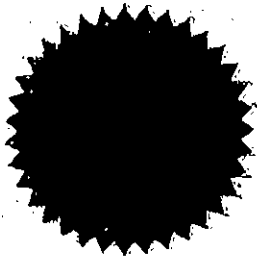
The Degree of

MASTER OF ARTS IN ISLAMIAT

in the examination held in Sep/Oct 2011 session Annual 2010-11

He / She was placed in SECOND Division / ~~Grade~~ / ~~CGPA~~

The examination was taken as a whole / ~~in Parts~~.



Pirasad
Controller of Examinations

[Signature]
Registrar

VC AL
Vice Chancellor

Result Declaration Date. 27-12-2011

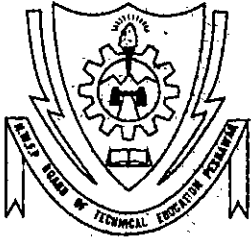
Serial No. 8791

Roll No. 3573

(13)

NWFP BOARD OF TECHNICAL EDUCATION

PESHAWAR



Diploma in Information Technology

Session Ist Term, 2009

This is to certify that

Mr./Miss FAZAL SHER

Son/Daughter of Mr. ZARIF KHAN

Registration No. NICE/MRD/DTT/Mar-08/2816

of NAPSTER INSTT: OF COMPUTER EDU: MARDAN has

Satisfactorily completed the one year duration Information Technology course titled "Diploma in Information Technology" and passed its Examination held by the N.W.F.P Board of Technical Education Peshawar in the month of Feb, 2009.

He/She secured 1075 Marks out of 1700 and was placed in Grade 'B'

In recognition thereof, this Diploma in Information Technology is awarded to him/her at Peshawar.

On the 22nd day of June, 2011.


Assistant Secretary


Secretary

34516

S.No.

Roll No 570

Group

LANGUAGE: Honours in Arabic



Board of Intermediate and Secondary Education

Mardan N.W.F.P. Pakistan

ORIENTAL LANGUAGES

SESSION 2005

This is to certify that FAZAL SHER Son of ZARIF KHAN
and resident of District Mardan has passed the Honors in Arabic Examination of the Board of
Intermediate & Secondary Education Mardan, held in Sep / Oct, 2005. He obtained 285 Marks out of 600 and has been placed
in 2nd division.

His Registration No. is 100-B/HRAR-05.

Rashidul.

Asstt. Secretary

rouud

Secretary

This Certificate is issued without alteration or erasure.

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

۱۵

تنظیم المدارس (اہل سنت) پاکستان

No 013311



حفظ قرآن سرٹیفکیٹ

تاریخ اجراء: ۹ جولائی ۲۰۰۹ء

نمبر شمار ۷۸۳۳

تصدیق کی جاتی ہے کہ حافظ / حافظہ فضل شیر بن / بنت ظریف خان
وازا العلوم / مدرسہ جامعہ فاطمہ للہدیین وللبنات اسلام آباد کالونی مروان نے
حفظ قرآن پاک کی سعادت سے بہرہ ور ہونے کے بعد تنظیم المدارس (اہل سنت) پاکستان
کے تحت حفظ کے امتحان میں کامیابی حاصل کی اور اس سند کے تحت قرار پائے / پائی ہیں۔
اللہ تعالیٰ عزیزم / عزیزہ کو قرآن پاک کی برکتوں اور اعمال صالحہ کی دولت سے مالا مال فرمائے

آمین بجاہ نبیہ الکریم علیہ التحیة والتسلیم



(16)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

تنظيم المدارس الإسلامية باكستان (مستقلة)

Nº 007332

الرقم السن ٢٥٠٠



شهادة التجويد والقرآن

الحمد لله رب العالمين والصلاة والسلام على خير الأنبياء والمرسلين وعلى آله وصحبه أجمعين

شهادة بان القاري فضل شير بن/بنت طريف خان

ورقم التسجيل ٢٥٧٥ ورقم الجلوس ١٧١٦

من طلاب الجامعة الفاطمية للبنين والبنات اسلام آباد كمالوني مردان

قد حصلت على شهادة التجويد والقرآن بعد اجتياز الامتحان

المنعقد بأشراف تنظيم المدارس الإسلامية باكستان

في ١٤٣٠ هـ الموافق ٢٠٠٩ ش بتقدير المعتاد مع الشرف وعدد درجاته ٢٠٠/١٧٥ فقط

ونسئلكم الله عز وجل ان يشرك به / بهاسيدك العلماء العالمين

المكتب المركزي
لتنظيم المدارس الإسلامية باكستان
التعميم سكرتري
كرمي شامولاهود

محل الاصدار

الامين العام

الامين العام
لتنظيم المدارس (اهل السنة)
باكستان


الرئيس

الرئيس
لتنظيم المدارس (اهل السنة)
باكستان

تاريخ الاجراء رجبت المرجب ١٤٣٠ هـ

**Government of Khyber Pakhtunkhwa
District Accounts Office Mardan
Monthly Salary Statement (March-2015)**

Mess
AMJALI
Advocate
SUPREME COURT

Aux. B
(17)


Personal Information of Mr FAZAL SHER d/w/s of ZARIF KHAN

Personnel Number: 00390505 CNIC: 1610103434137 NTN:
Date of Birth: 01.04.1988 Entry into Govt. Service: 08.10.2007 Length of Service: 07 Years 05 Months 025 Days

Employment Category: Vocational Temporary

Designation: QARI 60000003-Education Schools
DDO Code: MR7128-Head Master GHS Kass Koroona Mardan
Payroll Section: 003 GPF Section: 001 Cash Center:
GPF A/C No: 390505 Interest Applied: Yes GPF Balance: 42,721.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2011 Pay Scale Type: Civil BPS: 15 Pay Stage: 5

Wage type		Amount	Wage type		Amount
0001	Basic Pay	12,000.00	1000	House Rent Allowance	1,566.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,200.00
1948	Adhoc Allowance 2010@ 50%	2,642.00	1970	Adhoc Relief Allow 2011	793.00
2118	Adhoc Relief Allow (2012)	2,400.00	2148	15% Adhoc Relief All-2013	1,800.00
2174	Adhoc Relief Allow-2014	1,200.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription - Rs1520	-1,520.00	3501	Benevolent Fund	-180.00
3511	Addl Group Insurance	-13.00	3604	Group Insurance	-115.00
3990	Emp.Edu. Fund KPK	-100.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till March-2015: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 26,457.00 Deductions: (Rs.): -1,928.00 Net Pay: (Rs.): 24,529.00

Payee Name: FAZAL SHER
Account Number: 0870-7
Bank Details: ABL, BAGHE HARAM, 250609 BAGHE HARAM BAGHE HARAM,

Leaves: Opening Balance: Availed: Earned: Balance:

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) MARDAN

NOTIFICATION:

Consequent upon the advertisement published in the daily "Mashriq" Peshawar dated: 08/04/2007 and interview held on 26/04/2007 by the District recruitment / selection committee and approval given by the district selection / promotion committee in its meeting held on 28/09/2007, the undersigned being competent authority is pleased to appoint the following Qari (Male) candidates in BPS-07 (Rs. 2940-160-7740) plus usual allowances as admissible to them under the contract policy 2005 against the vacant Qari posts at the schools noted against each with effect from the date of their taking over charge in the interest of public service subject to the following existence terms and conditions:

S#	Name	Father's Name	Residence	School where Appointed	Remarks
1	Habib Gul	Mehmood Gul	Pir Abdul Haq Koroona Kot Road Takht Bhai	GHS Khadi Killi	Against Vacant Qari Post
2	Umar Nabi	Muhammad Zaman	Zarin Abad PO Lund Khwar Takht Bhai	GHS Qutab Garh	Against Vacant Qari Post
3	Hamid Ur Rahman	Habib Ur Rahman	Vill: Kinwaja Rashaka Nisala Road Mardan	GHS Pali Kalan	Against Vacant Qari Post
4	H. Abdul Ali Khan	Musafar Khan	Moh: Adda Rustam	GHS Naseer Killi	Against Vacant Qari Post
5	Muhammad Ayub	Muhammad Yaqoob	VPC Qasmi Mardan	GHSS Kohi Barmol	Against Vacant Qari Post
6	Ihsan Ullah	Amir Ullah	VPO Alo	GHS Mian Khan	Against Vacant Qari Post
7	Muhammad Hayat	Khair Ullah	Vill: Iqam Gul Koroona PO Ikram Pur Takht Bhai	GHS Kati Garhi	Against Vacant Qari Post
8	Hafiz Muhammad Farooq	Taufur Khan	Moh: Sahib Zada Baba Bakhshali Mardan	GHS Bakhshali	Vice Muhammad Ibrahim Against AT Post
9	Muhammad Shah	Shah Zareen	Bagh Colony Chato Chowk Street# 3 Shamsi Road	GHS Shamshad Abad	Against Vacant Qari Post
10	Said Hassan	Shamsher Khan	VPO Toru Moh: Mirzagan Mardan	GHS Nodah Toru	Against Vacant Qari Post
11	Liaqat Ali	Abdul Ghaffar	Vill: K. D. Zai Moh: Pakistan Koroona Garhi Kapura	GHS Qasam Toru	Against Vacant Qari Post
12	Asad Ullah	Hamdullah Shah	VPO Gumbat Mardan	GHS Dhakki Gumbat	Against Vacant Qari Post
13	Fazal Sher	Zarif Khan	H/ 9 Street# 1 Block B Canal Road Islam Bagh	GHS Pir Abad	Against Vacant Qari Post
14	Muhammad Fazeel	Samee Ur Rahman	VPO Gumbat	GHSS Pirsaddi	Against Vacant Qari Post
15	Iftikhar Hussain	Faqeer Hussain	Madina Colony Khat Killi Par Hoti Mardan PST GPS Pani Alladad Kheil	GHS Badar Banda	Against Vacant Qari Post

TERMS AND CONDITIONS:

- 1- Their appointments are made purely on contract policy 2005 and will not be entitled for pension / Gratuity as per policy and are liable to termination at any time without any notice or reason. Moreover in-Service candidates will also be governed by the contract policy 2005.
- 2- They are required to produce health and age certificates from the concerned medical

- 3- They are not allowed to take over charge if their age is less than 18 years and above 33 years, however the candidates who obtained age relaxation certificate from the competent authority are entitled to take overcharge.
- 4- Their educational/professional certificates/degree should be verified from the concerned Board/University before drawl of their pay and pay should not be released till the comparison of their score with merit list maintained in this office after verification.
- 5- No TA/DA is allowed.
- 6- They will be governed by contract policy 2005 and other policy/rules released by the Govt: from time to time.
- 7- They are entitled for annual increment on completion of one year service.
- 8- They will take over charge of the post within 15 days.
- 9- In case of resignation they will give one month prior notice to the Department or forfeit one month's salary in Government treasury.
- 10- In case of duplication of post the appointment order of junior most candidate will be withdrawn automatically.
- 11- If in case there certificate / degrees are found fake there appointment order will be withdrawn from the date of issue and the FIR will be register against the concerned.

(MIAN WALI MUHAMMAD)
EXECUTIVE DISTRICT OFFICER
(SCHOOLS & LITERACY) MARDAN

Endst: No. 11201/G / Appt: Qari/10-2007. Dated Mardan the, 29/9 2007.

Copy forwarded for information and necessary action to the:-

- 1- Director Schools and Literacy NWFP, Peshawar.
- 2- District Nazim Mardan
- 3- District Coordination Officer Mardan.
- 4- District Accounts Officer Mardan.
- 5- District Officer (S & L) Male Mardan.
- 6- Principal / Head Master Concerned.
- 7- Supdtt: local office.
- 8- ADO (Estt :) Local Office.
- 9- Candidate Concerned.

Asif MIA

EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN

29/9/07

(20)

OFFICE OF THE
DISTRICT COORDINATION OFFICER
MARDAN.

Dated Mardan the 7/8 /2008.

OFFICE ORDER.

In exercise of the powers delegated to me under NWFP District Government Rules of Business 2001 and in pursuance of Finance Department NWFP Notification F.D/S.O/(FR) 10/22/2/2007 dated 26-01-2008, on the recommendation/verification by the Executive District Officer Elementary & Secondary Education, sanction is hereby accorded in favour of the following Qari for up-gradation to BPS-12 w.e.f. the date noted against each:-

S.NO.	Name with Designation.	Name of School	Date.
1-	Hafiz Muhammad Fazeel Qari	GHSS, Pir Saddi	1-10-2007
2-	Hafiz Gul Muhammad Qari	GHS, Ibrahim Khan Killi	-do-
3-	Hafiz Riaz Muhammad Qari.	GHS, Toru.	-do-
4-	Hafiz Malik Taj Qari.	GHSS, Chamtar.	-do-
5-	Hafiz Shah Faisal Qari	GCMS, NO.3 Mardan.	-do-
6-	Hafiz Fazal Sher Qari	GHS, Kass Koroona	-do-
7-	Hafiz Asad-ur-Rahman Qari.	GHS, Jalala Mardan.	-do-

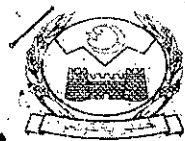
By order of
District Coordination Officer,
Mardan.

No. 9087-89/DCO(M) dated Mardan the 7/8 /2008.

Copy forwarded for information & n/action to:-

- 1- The Executive District Officer Elementary & Secondary Education Mardan.
- 2- The District Accounts Officer Mardan.
- 3- The Principal/Head Masters concerned.

[Signature]
Human Resource Dev. Officer,
Mardan.



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MARDAN

PHONE NO.0937-9230151 – FAX-9230151

EMAIL:emismardan@yahoo.com

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NOTIFICATION:

Consequent upon the approval given by the Departmental promotion committee in its meeting held at G.C.M.S bank road Mardan on 16-01-2013. The competent authority is pleased to promote the following Qaries of BPS-12 to Senior Qaries post in **BPS-15 (Rs. 8500 – 700 – 29500)** on Seniority-cum-fitness basis, vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. *SQ(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:-* Dated 13/11/ 2012. With effect from 16-01-2013.

S.NO.	Seniority No.	NAME	FATHER/NAME	DESIGNATION	SCHOOL	Promoted/As
01	04	S.M. Zakaria	S.M. Shakirullah Jan	Qari	GHS Gaddar	Senior Qari BPS-15
02	05	Abdul Rahman	Toti Rahman	Qari	GHSS Hathian	Senior Qari BPS-15
03	12	Fazal Rahim	Abdul Ghafoor	Qari	GCMHS Boys Mardan	Senior Qari BPS-15
04	14	Hazrat Hussain	Roghan Shah	Qari	GHSS Baghdada	Senior Qari BPS-15
05	17	Muhammad Afzal	Mohib Shah	Qari	GHS Guli Bagh	Senior Qari BPS-15
06	21	M. Raza Shah	Muhammad Shafi	Qari	GHS jehangir Abad	Senior Qari BPS-15
07	25	Yahya Habib	Noor Ahmad Bag	Qari	GHS Kata Khat	Senior Qari BPS-15
08	32	Hafiz Bacha Gul	Ghulam Muhammad	Qari	GHSS No.1 Mardan	Senior Qari BPS-15
09	34	Mudassir Shah	Zahir Shah	Qari	GHS Babu Zai Mardan	Senior Qari BPS-15
10	36	Hazrat Umar	Shamsul Qamar	Qari	GHSS Mayar	Senior Qari BPS-15
11	37	Malik Taj	Ashraf Khan	Qari	GHSS Chamtar	Senior Qari BPS-15
12	39	Irfanullah	Mubarak Shah	Qari	GHS Garhi Kapura	Senior Qari BPS-15
13	44	Muhammad Ayaz	Fazal Dad	Qari	GHS Garhi Kapura	Senior Qari BPS-15
14	45	Muhammad Iqbal	Umara Khan	Qari	GHS Sikandari	Senior Qari BPS-15
15	48	Muhammad Darwesh	Mir Abdullah	Qari	GHS Garhi Daulatzai	Senior Qari BPS-15
16	53	Mehboob ur Rashid	Ghulam Sarwar	Qari	GHS Tambulak	Senior Qari BPS-15
17	54	Shah Faisal	M. Afsar Khan	Qari	GCMS Mardan - No-3	Senior Qari BPS-15
18	55	Muhammad Tariq	Ghulam Sarwar	Qari	GHS Dheri Likpani	Senior Qari BPS-15
19	59	Muhammad Ilyas	Hafiz Zardullah	Qari	GHSS Mardan	Senior Qari BPS-15
20	60	Jehan Zeb	Manzoor	Qari	GHS Sowaryan Toru	Senior Qari BPS-15
21	61	Muhammad Rasool	Ghulam Rasool	Qari	GHS Qasmi	Senior Qari BPS-15
22	62	Akhtar Ali	Wazir Dad	Qari	GHS Sawal Dher	Senior Qari BPS-15
23	63	Hazrat Hussain	Khadim Hussain	Qari	GHS Seri Behlol	Senior Qari BPS-15
24	68	Muhammad Farooq	Taifoor Khan	Qari	GHS Gaddar	Senior Qari BPS-15



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MARDAN
PHONE No.0937-9230151 – FAX-9230151
EMAIL:emismardan@yahoo.com

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S.NO.	Seniority No.	NAME	FATHER NAME	DESIGNATION	SCHOOL	Promoted/As
25	69	Muhammad Hayat	Khairullah	Qari	GHS Katti Garhi	Senior Qari BPS-15
26	70	Asadullah	Hamdullah Shah	Qari	GHS Dakki Mardān	Senior Qari BPS-15
27	71	Muhammad Fazeel	Samiur Rehman	Qari	GHS Kandar	Senior Qari BPS-15
28	72	Liaqat Ali	Abdul Ghaffar	Qari	GHSS Baghicha Dheri	Senior Qari BPS-15
29	73	Hameed Ur Rehman	Habib ur Rehman	Qari	GHS Mohabbat Abad	Senior Qari BPS-15
30	74	Fazal Sher	Zarif Khan	Qari	GHS Kass Koroona	Senior Qari BPS-15
31	75	Ihsanullah	Amirullah	Qari	GHS Ghalla	Senior Qari BPS-15
32	76	Muhammad ayub	Muhammad Yaqub	Qari	GHS Kohi Barmol	Senior Qari BPS-15
33	77	Iftikhar Hussain	Faqeer Hussain	Qari	GHS Naseer Killi	Senior Qari BPS-15

Note: Necessary entry to this effect should be made in their Service Books subject to the verification of their FA / Hifaz sanad if not verified from the concerned Board / Madrassa.

(BAHADAR KHAN MARWAT)
DISTRICT EDUCATION OFFICER (Male)
MARDAN

Endst: No. 1026-30 /Qaries BPS-15 promotions file dated 2-2- /2013.

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

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Mardan.
3. Principal/Head Master concerned.
4. All Qaries concerned.
5. Gen:File.


DISTRICT EDUCATION OFFICER (Male)
MARDAN

1/2/2013
1/2/2013

Babu Tej Bah Bahadar

GOVERNMENT OF NWFP
FINANCE DEPARTMENT

(REGULATION WING)
Peshawar, the 26th January 2008

NOTIFICATION

No. FD/SO/(FR)10-22/2007. In supersession of this Department's letter No. SO(FR)10-22(B)2005 dated 01-10-2007 and in pursuance of the decisions of the meeting held under the chairmanship of secretary Establishment on 02-01-2008, the Competent Authority is pleased to allow upgradation for the incumbents of the posts as per details given below w.e.f 01-10-2007:-

S.No.	Existing Designation and Pay Scale	Qualification	Upgraded Scale
1	Primary School Teacher (PST) (BPS-07)	FA/F.Sc and are trained teachers	BPS-09 (one time only)
2	Primary School Teacher (PST) with requisite experience renamed as Head Teacher/Head Mistress of Primary Schools (BPS-07)	Having 10 years services	BPS-12 (one time only)
3	CT (BPS-09)	BA/B.Sc and are trained Teachers	BPS-15 (one time only)
4	SETs (BPS-16)	With at least ten years service. Upgradation to post shall be made through DPC as per laid down procedure	BPS-17
5	Qari/Qaria (BPS-07)	Hafiz Quran with SSC	BPS-12

SECRETARY TO GOVT. OF NWFP
FINANCE DEPARTMENT

Endst No. & Date even.

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

- 1) All the Secretaries in NWFP, Peshawar.
- 2) All the DCOs/EDOs Schools & Literacy Department, NWFP.
- 3) Accountant General, NWFP Peshawar.
- 4) Director School & Literacy NWFP, Peshawar.
- 5) Director of Education FATA NWFP, Peshawar.
- 6) PSO to Chief Minister, NWFP
- 7) PSO to Chief Secretary, NWFP.
- 8) PS to Secretary Finance Department, NWFP
- 9) All District / Agency Accounts Officer in NWFP.

AMJAD ALI
Advocate
SUPREME COURT

(NAIB KHAN)
SECTION OFFICER (III)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY HARIPUR

PH No. 0995-610178, 610268

Endst: No. 610-15

Dated: 22/01/2008

Copy of the above is forwarded to:-

1. The District Accounts Officer, Haripur.
2. The District Officer (M & F) Schools & Literacy Haripur for further necessary action.
3. The Budget & Accounts Officer Schools & Literacy Haripur.
4. The DY: District Officer (M & F) Schools & Literacy Haripur in case of PST.
5. Principals/Headmasters/Headmistress GHSS/GHSS/GMS/GGMS for information and necessary action.
6. Office Copy.

EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY HARIPUR

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Annexure
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A/C

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GOVERNMENT OF NORTH WEST FRONTIER PROVINCE
FINANCE DEPARTMENT.

NOTIFICATION.

DATED, PESHAWAR THE: 16.4.92.

No. FD(PRC)1-1/89. In continuation of this Department Notification of even number dated 7.8.1991, the Governor of NWFP, is pleased to order the following pay scales/benefits to the under mentioned categories of teachers with effect from 1.7.1991.

S.No.	Name of post	Benefit extended.
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1.	2	3
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AMIAKALI
Advocate
SUPREME COURT

1. Qari/Theology Teacher.

All the present and future Qari/Theology Teachers who possess the qualification of FA/FSc:(2nd Division) in addition to existing qualifications, prescribed under the relevant service rules, shall be placed in BPS-9 with 1/3rd posts in selection grade BPS-10.

All other teachers who do not possess higher qualification shall continue getting existing pay scales with selection grade accordingly.

However the higher scale allowed to these teachers will be personal to them and the inter-se-seniority will remain intact.

2. Oriental Teacher.

All the present and future Oriental Teachers in Education Department who possess the qualification of BA/BSc:(2nd Division) over and above the qualification prescribed under the relevant service rules shall be placed in BPS-14 with 1/3rd selection grade in BPS-15.

All other teachers who do not possess higher qualification shall continue getting existing pay scales with selection grade accordingly.

However, the higher scale allowed to these teachers will be personal to them and the inter-se-seniority will remain intact.

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27/4/92

ASD O A

Contd:Page.2.

The advance increments sanctioned by Finance Department vide Para-9 of its letter No. SO(SR-I)1-67/82 dated, 24.8.1983 will not be admissible on acquiring/possessing higher qualification for which higher pay scales are being sanctioned through this Notification.

SECRETARY TO GOVERNOR OF
NORTH WEST FRONTIER PROVINCE
FINANCE DEPARTMENT.

Enst: No. FD(PRC)1-1/89, Dated Peshawar 16.04.1992.

A Copy is forwarded to the Accountant General NWFP, Peshawar for information and necessary action.

Sd/-

(GHULAM DASTGIR AKHTAR)
Additional Secretary (Regulation)
Finance Department.

Enst: No. FD(PRC)1-1/89, Dated Peshawar the 16.04.1992.

A copy is forwarded to all concerned.

Sd/-

Deputy Secretary (Regulation)
Govt: of NWFP, Finance Department.

OFFICE OF THE DIRECTOR OF SECONDARY EDUCATION NWFP, PESHAWAR.

Enst: No. 3034-3139 A-258/RBPS-91/N.Gtd: dated Pesh: the 23/4/1992.

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

1. Additional Director Local Directorate.
2. Accountant General NWFP, Peshawar.
3. All the Divisional Directors of Education (Schools), in NWFP, Peshawar.
4. Registrar Departmental Exam: Edu: Department NWFP, Peshawar.
5. All the Distt: Edu: Officers (Male) and (Female) in NWFP, (Secondary)
6. All the Distt: Accounts Officer in NWFP.
7. PA to Director of Secy: Education NWFP, Peshawar.
8. All the DEOs (M & F) Primary in NWFP.

Note:- The District Education Officers (Male and Female) Secy: in NWFP, are requested to circulate the same among the Headmasters/Headmistresses/Principals of High School/Govt: Middle School/Govt: Higher Secy: School/Comp: Highers Secondary School (M&F) under the jurisdiction.

2. The Drawing and Disbursing Officers are requested to fix the pay of the teachers concerned provisionally themselves and get the approval of the Audit office concerned.

Deputy Director (Secondary),
For Director of Secondary Edu:
NWFP, Peshawar.

Abdul Jabbar.

(a) Sec.
Mandawar

may be
circulated
by
Jabbar

20/4/92
22/4/92

GOVERNMENT OF N.W.F.P
FINANCE DEPARTMENT
NOTIFICATION

AMJAD ALI
SECRETARY
Handwritten signatures and stamps in Urdu and English.

Peshawar dated 7-8-1991 No.FN (PRC)1-1/89:- in exercise of all the power enabling him in this behalf the governor of the north west frontier province to please to order the following scale of pay/benefits to the various categories of teachers with effect from 1-7-1991

Sr No.	Name of the post	benefit extended
1	2	3

1.Primary school teacher PTC/JV)

All the present and future primary school teacher who hold the qualification of FA/F.Sc 2nd division place existing Prescribe professional training shall be placed in BPS-9 with 1/3 in selection grade BPS-10

All other teacher who do not passed higher qualification shall continues getting existing pay scale with subjective grade accordingly, However the higher Scale /grades are allowed to those teacher will be passed Personal to those inter-se-seniority Will remain intact

2.ELEMENTRY school teacher EST/SV/PVT/DM/PTI . All the present and future elementary

school teachers who passed the qualification of B.A/BSc 2nd division plus existing prescribed professional training shall be placed In BPS- 15

All other teachers who do not passed higher qualification shall continuous getting existing pay scale with S/grade accordingly

However the higher scale/grade allowed to these teachers will be personal to them and the inter seniority will remain in toot.

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**FINANCE DEPARTMENT
(REGULATION WING)**

NO. SO(FR)/FD/10-22(E)/2010
Dated Peshawar, the 26-06-2012

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Subject: - **GRANT OF INCENTIVE OF HIGHER PAY SCALE/GRADE ON THE BASIS OF TIME SCALE TO THE DIFFERENT CADERS OF TEACHERS IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA.**

Dear Sir,

I am directed to refer to your department letter No. SO (B & A)/1-18/E&SE/2008 dated 12.06.2012 on the subject noted above and to state that consequent upon the approval of the competent authority Finance Department agrees to allow upgradation of the posts as per details given below w.e.f 01/07/2012.

Category/Nomenclature of the teaching posts		Basic Pay Scales	Revised nomenclature & Pay Scales	Promotion to Higher scale
Primary school teachers		BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	PST (BS-12) & PST (BS-15)	30,000 posts of PST presently sanctioned in various pay scales will be upgraded in BPS-12 with effect from 01.07.2012. 20,000 posts of the existing posts of PST in various existing Pay Scales may be upgraded to BPS-14 and re-designated as Senior PST teachers, The posts may be filled in by promotion from amongst the holders of posts of PST with minimum 10 years-long service as such. 22,768 posts of the existing posts of PST, (one post in each Primary School) may be upgraded to BPS-15 and re-designated as Primary School Head Teacher, to be promoted from amongst Senior PST teachers on merit with due regard to seniority.
Middle/High/HS School teachers	1. CT	BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	CT (BS-15) & SCT (BS-16)	All the existing posts of CT are to be upgraded in BPS-15, while 1/3 out of the total CT posts are to be upgraded to BPS-16 and to be re-designated as Senior CT, which will be filled through promotion from CT on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of CT as per service rules.
	2. AT	BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	AT (BS-15) & SAT (BS-16)	All the existing posts of AT are to be upgraded in BPS-15, while 1/3 out of the total AT posts are to be upgraded to BPS-16 and to be re-designated as Senior AT, which will be filled through promotion from AT on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of AT as per service rules.

3.TT	BPS-07	TT (BS-15) & STT (BS-16)	All the existing posts of TT are to be upgraded in BPS-15, while 1/3 out of the total TT posts are to be upgraded to BPS-16 and to be re-designated as Senior TT, which will be filled through promotion from TT on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of TT as per service rules.
	BPS-09		
	BPS-10		
	BPS-12		
	BPS-14		
	BPS-15		
4.DM	BPS-09	DM (BS-15) & SDM (BS-16)	All the existing posts of DM are to be upgraded in BPS-15, while 1/3 out of the total DM posts are to be upgraded to BPS-16 and to be re-designated as Senior DM, which will be filled through promotion from DM on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of DM as per service rules.
	BPS-10		
	BPS-12		
	BPS-14		
	BPS-15		
5.PET	BPS-09	PET (BS-15) & SPET (BS-16)	All the existing posts of PET are to be upgraded in BPS-15, while 1/3 out of the total PET posts are to be upgraded to BPS-16 and to be re-designated as Senior PET, which will be filled through promotion from PET on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post of PET as per service rules.
	BPS-10		
	BPS-12		
	BPS-14		
	BPS-15		
6.Qari/Qaria	BPS-07	Qari / Qaria (BS-12) & S. Qari / S. Qaria (BS-15).	All the existing posts of Qari/Qaria are to be upgraded in BPS-12, while 1/3 out of the total Qari/Qaria posts are to be upgraded to BPS-15 and to be re-designated as Senior Qari/Qaria, which will be filled through promotion from Qaries / Qarias on merit with due regard to Seniority subject to the condition that he fulfill the minimum academic qualification required for the post Qari/Qaria as per service rules.
	BPS-09		
	BPS-10		
	BPS-12		
	BPS-14		
	BPS-15		

2. The Administrative Department however, should devise a policy in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators so that teachers do not take the scheme for granted but work for it.

3. Audit copies may be prepared and furnished to this department for authentication please.

Yours faithfully,

(Signature)
o/c (BIBI FATIMA)
SECTION OFFICER (FR)

Copy is forwarded to:-

Budget Officer-V, Finance Department for information and further necessary action please.

(Signature)
27/04/12

(Signature)
o/c SECTION OFFICER (FR)

NOTIFICATION

Peshawar dated the 7th August, 1991.

No. FR(PRC) 1-1/89:- In exercise of all the powers enabling him in this behalf the Governor of the North West Frontier Province is pleased to order the following Scales of pay/benefit to various categories of Teachers with effect from 1.7.1991.

99
AMJAL
Advocate
SUPREME COURT

S.No.	Name of the Post	Benefits Extended.
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1.	Primary School Teachers (PTC/JV).	All the present and future Primary School teachers who hold the qualification of BA/BS (2nd Division) plus existing prescribed professional training shall be placed in BPS-9 with 1/3rd in Selection Grade BPS-10. All other teachers who do not possess higher qualification shall continue getting existing pay scale with selection grade accordingly. However, the higher Scales/grades shall be allowed to those teachers will be personal to them and the inter-grades seniority will remain intact.
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2.	Elementary School Teachers (S.T/SV/PBT/PTL).	All the present and future elementary school teachers who possess the qualification of BA/BSc (2nd Div.) plus existing prescribed professional training shall be placed in BPS-14 with Selection Grade 1/3rd BPS-15. All other teachers who do not possess higher qualifications shall continue getting existing pay scale with S/Grade accordingly. However, the higher scales/Grade shall be allowed to those teachers will be personal to them and the inter-grades seniority will remain intact.
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A Deo A
30/12/91

(Next Page---2---)

DISTRICT EDUCATION OFFICER
5161
30-12-91

مولیٰ محمد شریف علی داد اساتذہ اسکول کراچی صدر
مقام عربی و ریاضت کالج اسکول کراچی صدر

3. Arabic Teachers. All the present and future Arabic teachers who possess the qualification of Trained Fazil with BA/BSc: (2nd Division) and five years teaching experience or MA Arabic or equivalent qualifications shall be placed in BPS-14 with 1/3rd in selection grade BPS-15.

All other teachers who do not possess higher qualification shall continue getting existing pay scale with selection grade accordingly.

However, the higher scale/grade allowed to these teachers will be personal to them and the inter-se-seniority will remain intact.

4. Secondary School Teachers. All the present and future Secondary School Teachers with prescribed qualification under the Rules shall be placed in BPS-16 with 1/3rd in selection Grade BPS-17.

The advance increments sanctioned by Finance Department vide para 9 of its letter No. FD(SR-I)4-67/82 dated, 24.8.1983 will not be admissible on acquiring/possessing qualifications for which higher pay scales are being sanctioned through this notification.

SECRETARY TO GOVERNMENT OF North West Frontier Province, Finance Department.

Endst: No. FD(FRC) 1-1/89 Dated Peshawar the: 7th August 1991.

A copy is forwarded to the Accountant General NWFP Peshawar for information and necessary action.

Sd/-

(GENLAL DASTGIR AKHTAR) Deputy Secretary (Regulation) Finance Department.

Endst: NO. FD(FRC) 1-1/89 Dated Peshawar the: 7th August, 1991.

A copy is forwarded to:-

1. All Administrative Secretaries to Govt of NWFP.
2. All commissioners of Division, NWFP.
3. All Heads of Attached Departments NWFP.

3. ARABIC TEACHER.

All the present and future Arabic teachers who passed the qualification of trained Fazil with BA/B.Sc 2nd division and five years teaching experience or MA Arabic or equivalent qualification shall be placed in BPS-14 with 1/3 in selection grade BPS -15 All other teachers who do not possess higher qualification shall continue getting existing pay scale with selection grade accordingly.

However the higher scale/grade allowed to those teacher will be personal to there and inter-se-seniority will be remain intact.

Attest
Amjad Ali

4. SECONDARY SCHOOL TEACHER. All the present and future secondary school teaches with prescribed qualification under the rules shall be placed in BPS -16 with 1/3 in selection grade BPS-17.

The advance increment sanctioned by finance department vide Para 9 of its letter NO.FD (SR-I) 1-67/82 dated 24-8-1983 will not be admissible on equation/processing qualification for which higher pay scale are sanctioned through this notification.

Secretary to government of
North west Frontier province
finance department.

End st No.FN (PRC)1-1/89

AMJAD ALI
Advocate
SUPREME COURT

A copy is forwarded to the accountant general NWFP Peshawar for information and necessary notion.

(GULAM DASTAGIR AKHTER)
DEPUTY SECRETRAY (REGULATION)
FINANCE DEPARTMENT

No.FN (PRC)1-1/89

A copy is forwarded to :-

1. All administrative to secretary to Govt of NWFP.
2. All commissioners of Division, NWFP,
3. All heads of Attached Department NWFP.

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No.SO (B&A)/1-18/E&SE/2008
Dated Peshawar, 01.06.2012

AMJAD ALI
Advocate
SUPREME COURT

MINUTES OF THE MEETING REGARDING UPGRADATION AND PROMOTION OF
TEACHERS TO HIGHER SCALE IN ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA.

A meeting on the subject was held on 01.06.2012 at 5 PM under the chairmanship of Additional Chief Secretary, Khyber Pakhtukhwa in his office. The following attended the meeting.

1. Mr. Muhammad Mushtaq Jadoon Secretary Elementary & Secondary Education.	2. Mr. Masood Ahmed Special Secretary finance.
3. Mr. Muhammad Rafiq Khattak, Director Elementary & Secondary Education.	4. Mr. Noor Aslam Khan Wazir, SO (Budget), Elementary & Secondary Education.

- The meeting started with the recitation from the Holy Quran Secretary E&SE Department briefed the forum about the Time Scale and Service Structure.
- After a very long discussion it was sic that time scale and sic etc were not feasible due to various reasons are the following structure was recommended for approval of the competent authority.

Category/ nomenclature of the teaching posts	Basic pay scales	Proposed Pay Scale	Promotion in Higher Scale
Primary School teachers	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10	BPS-12	All the existing posts of the PST are to be upgraded in BPS-12, while one PST post in each Primary School is to be upgraded to BPS-15 and to be re-designated as Primary School Head Teacher (PSHT) which will be filled through promotion from PST on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of PST as per service rules.
Middle/High/MS School Teacher	1. CT BPS-09 BPS-10 BPS-12 BPS-14 BPS-15	BPS-15	All the existing posts of CT are to be upgraded in BPS-15, while 1/3 out of the total CT posts are to be upgraded to BPS-16, and to be re-designated as Senior CT, on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification for the post of CT as per service rules.



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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No. SO (B & A) /1-18/E&SE/2008
Dated Peshawar, 01.06.2012

36

MINUTES OF THE MEETING REGARDING UPGRADATION AND PROMOTION OF
TEACHERS TO HIGHER SCALE IN ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA.

A meeting on the subject was held on 01.06.2012 at 5 PM under the chairmanship of Additional Chief Secretary, Khyber Pakhtunkhwa, in his office. The following attended the meeting:-

1. Mr. Muhammad Mushtaq Jadoon Secretary Elementary & Secondary Education	2. Mr. Masood Ahmed Special Secretary Finance
3. Mr. Muhammad Rafiq Khattak,, Director, Elementary & Secondary Education	4. Mr. Noor Alam Khan Wazir, SO (Budget), Elementary & Secondary Education Department

Muhammad Ali
MUHAMMAD ALI
Advocate
SUPREME COURT

2. The meeting started with the recitation from the Holy Quran. Secretary E&SE Department, briefed the forum about the Time Scale and Service Structure.
Decision:
3. After a very long discussion it was felt that time scale and four-tier etc were not feasible due to various solid reasons and the following structure was recommended for approval of the competent authority.

Category/ Nomenclature of the teaching posts	Basic Pay Scales	Proposed New Scale	Promotion in Higher Scale
Primary school teachers	BPS-5	BPS-12	All the existing posts of PST are to be upgraded in BPS-12, while one PST post in each Primary School is to be upgraded to BPS-15 and to be re-designated as Primary School Head Teacher (PSHT) which will be filled through promotion from PST on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of PST as per service rules.
	BPS-6		
	BPS-7		
	BPS-9		
	BPS-10		
Middle/High/HS school teachers	BS-09	BS-15	All the existing posts of CT are to be upgraded in BPS-15, while 1/3 out of the total CT posts are to be upgraded to BPS-16 and to be re-designated as Senior CT, which will be filled through promotion from CT on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of CT as per service rules.
	BS-10		
	BS-12		
	BS-14		
	BS-15		
			All the existing posts of AT are to be

Amir

3. TT	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	BS-15	All the existing posts of the TT are to be upgraded in BPS-15, while 1/3 out of the total TT posts are to be upgraded to BPS-16 and to be re-designated as Senior TT which will be filled through promotion from TT on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of TT as per service rules.
4. DM	BS-09 BS-10 BS-12 BS-14 BPS-15	BS-15	All the existing posts of DM are to be upgraded in BPS-15, while 1/3 out of the total DM posts are to be upgraded to BPS-16 and to be re-designated as Senior TT which will be filled through promotion from DM on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of DM as per service rules.
5. PET	BS-09 BS-10 BS-12 BS-14 BPS-15	BS-15	All the existing posts of PET are to be upgraded in BPS-15, while 1/3 out of the total PET posts are to be upgraded to BPS-16 and to be re-designated as Senior PET which will be filled through promotion from DM on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of DM as per service rules.
6. Qari/Qaria	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	BS-12	All the existing posts of Qari/Qaria are to be upgraded in BPS-12, while 1/3 out of the total Qari/Qaria posts are to be upgraded to BPS-15 and to be re-designated as Senior Qari/Qaria which will be filled through promotion from DM on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of Qari/Qaria as per service rules.

4. The meeting ended with mutual vote of thanks from and to the chair.

Muhammad Mushtaq Jadoon
 Secretary E&SE:

Masood Ahmed
 Special Secretary Finance

Muhammad Rafiq Khattak
 Director E&SE:

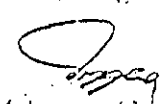
Noor Aslam Khan Wazir,
 So (Budget) E&SE

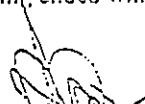
Attaullah Khan
 Additional Chief Secretary

3. TT	BS-07	BS-15	All the existing posts of TT are to be upgraded in BPS-15, while 1/3 out of the total TT posts are to be upgraded to BPS-16 and to be re-designated as Senior TT, which will be filled through promotion from TT on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of TT as per service rules.
	BS-09		
	BS-10		
	BS-12		
	BS-14		
4. DM	BS-09	BS-15	All the existing posts of DM are to be upgraded in BPS-15, while 1/3 out of the total DM posts are to be upgraded to BPS-16 and to be re-designated as Senior DM, which will be filled through promotion from DM on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of DM as per service rules.
	BS-10		
	BS-12		
	BS-14		
	BS-15		
5. PET	BS-09	BS-15	All the existing posts of PET are to be upgraded in BPS-15, while 1/3 out of the total PET posts are to be upgraded to BPS-16 and to be re-designated as Senior PET, which will be filled through promotion from PET on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of PET as per service rules.
	BS-10		
	BS-12		
	BS-14		
	BS-15		
6. Qari/Qaria	BS-7	BS-12	All the existing posts of Qari/Qaria are to be upgraded in BPS-12, while 1/3 out of the total Qari/Qaria posts are to be upgraded to BPS-15 and to be re-designated as Senior Qari/Qaria, which will be filled through promotion from Qaries/Qarias on merit with due regard to Seniority subject to the condition that he fulfill the minimum qualification required for the post of Qari/Qaria as per service rules.
	BS-9		
	BS-10		
	BS-12		
	BS-14		

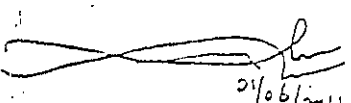
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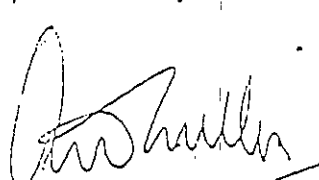
4. The meeting ended with mutual vote of thanks from and to the chair.


Muhammad Mushtaq Jadoon
Secretary, E&SE


Masood Ahmed
Special Secretary Finance


Muhammad Rafiq Khattak
Director E&SE


Noor Alam Khan Wazir
SO (Budget) E&SE


Altaullah Khan
Additional Chief Secretary

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

33

No.SO (B&A)/1-18/E&SE/2008
Dated Peshawar, 31.05.2012

Teachers by BPS and Designation wise in Khyber Pakhtunkhwa

AMJAD ALI
Advocate
SUPREME COURT

S.No.	Category of teachers	BPS	No.	Total	% Age
1	PST	BPS-5	590	71714	0.823
		BPS-6	265		0.37
		BPS-7	8257		11.514
		BPS-9	19394		27.044
		BPS-10	230		0.321
		BPS-12	42978		59.93
2	AT	BPS-9	406	4201	9.7
		BPS-10	03		0.07
		BPS-12	115		0.36
		BPS-14	809		19.26
		BPS-15	2868		68.27
3	DM	BPS-9	698	4399	15.87
		BPS-10	04		0.091
		BPS-12	362		8.23
		BPS-14	591		13.435
		BPS-15	2744		62.38
4	PET	BPS-9	562	3774	14.9
		BPS-10	03		0.08
		BPS-12	288		7.63
		BPS-14	567		15.024
		BPS-15	2354		62.4
5	Qari/ Qaria	BPS-7	562	1894	29.673
		BPS-9	250		13.2
		BPS-10	291		15.4
		BPS-12	789		41.66
		BPS-14	00		0.0
		BPS-15	02		0.11
6	TT	BPS-7	1446	4236	34.14
		BPS-9	583		13.763
		BPS-10	577		13.621
		BPS-12	56		1.32
		BPS-14	1505		35.53
		BPS-15	69		1.63
7	SST-General	BPS-16	3501	5775	60.62
		BPS-17	2274		39.38
8	SST-Science	BPS-16	987	1523	64.81
		BPS-17	536		35.194

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SOL/13/A/11-18/1E&SE/2008
Dated Peshawar, 31.05.2012

33

Teachers by BPS and Designation wise in Khyber Pakhtunkhwa

S.NO	CATEGORY OF TEACHERS	BPS	No.	Total	%
1	PST	BPS-5	590	71714	8.616
		BPS-6	265		0.37
		BPS-7	8257		11.514
		BPS-9	19394		27.044
		BPS-10	230		0.321
		BPS-12	42978		59.93
2	AT	BPS-9	406	4201	9.7
		BPS-10	03		0.07
		BPS-12	115		0.36
		BPS-14	809		19.26
		BPS-15	2868		68.27
3	DM	BPS-9	698	4399	15.87
		BPS-10	04		0.091
		BPS-12	362		8.23
		BPS-14	591		13.435
		BPS-15	2744		62.38
4	PST	BPS-9	562	3774	14.9
		BPS-10	03		0.08
		BPS-12	288		7.65
		BPS-14	567		15.024
		BPS-15	2354		62.4
5	Qari/Qaria	BPS-7	562	1894	29.673
		BPS-9	250		13.2
		BPS-10	291		15.4
		BPS-12	789		41.66
		BPS-14	00		0.0
		BPS-15	02		0.11
6	T.T	BPS-7	1446	4236	34.14
		BPS-9	583		13.763
		BPS-10	577		13.621
		BPS-12	56		1.32
		BPS-14	1505		35.53
7	SST-General	BPS-15	69	5775	1.63
		BPS-16	3501		60.62
8	SST-Science	BPS-17	2274	1523	39.38
		BPS-16	987		64.81
		BPS-17	536		35.194

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

Dated Peshawar, 11.07.2012

NOTIFICATION:

No. SO (B & A)/1-18/E&SE/2012: Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Mushtaq
Supreme Court
Supreme Court

Sr. No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
1.	Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/ Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	one thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

12.	Physical Education Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PETs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qaria	"do"	BPS-7 BPS-9 BPS-10 BPS-12 BPS-14 BPS-15	//(BPS-12) //	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
15.	Sr.Qari/Sr.Qaria	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07/2012

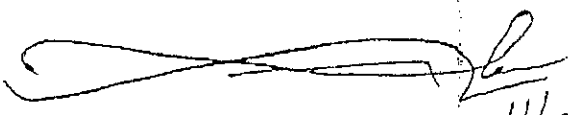
Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers


SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.


(NOOR ALAM KHAN WAZIR)
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

(36) Anas H

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

No. 1685-1709 / File No. PST teachers

Dated Peshawar the 27-8/2012

To All the Executive Distt. Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.

AMJALI ADVOCATE SUPREME COURT

Subject: UPGRADATION OF POSTS AND FIXATION OF PAY

I am directed to inform you that the Govt. of Khyber Pakhtunkhwa has upgraded the scales of the posts of PST/Qari/CT/DM/PET/AT/T.T with effect from 1-7-2012 vide Notification No. SO(B&A)/1-18/ E&SE/2012 dated 11-7-2012 and to ask you to fix the pay of all the PST teachers/Qari teachers (M & F) in BPS-12 and the pay of CT/DM/PET/AT/teachers (M & F) may be fixed in BPS-15 as per the upgradation notification cited above. Please complete their Service Books & submit the changes to the office of the Distt. Accounts Officers concerned at once.

I am further directed to ask you to attach/affix their seniority lists on the notice boards in your office within 15 days in connection with their promotion in next scale i.e. to BPS-14, BPS-15 & BPS-16 respectively.

Deputy Director (Establishment) Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

Endst: No. Copy forwarded for information to:-

- 1. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department
- 2. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar

DD Estt (S) reverse to DDO (F) PA to the Director E&SE Khyber Pakhtunkhwa Peshawar 30/8/12

EXECUTIVE DISTT. OFFICER (E&S) PESHAWAR 29-8-12

Deputy Director (Establishment) Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

O/O THE EXECUTIVE DISTRICT OFFICER (E&S) PESHAWAR

Enst: no. 11664-11963 dated 30/8/12

Forwarded to the:-

- 1. District Officer (Female) Peshawar.
- 2. Dy. District Officer (Female/Male) Peshawar.
- 3. All Principal/Head Master/Headmistress/GMS/GHS/GMSR/GMS/GMS in District Pesh;

Special PI 29/8/12

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE SWABI

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NOTIFICATION

Consequent upon the Notification issued vide Government of Khyber Pakhtunkhwa Elementary and secondary Education Department vide no. SO (B&A) 1-18/ E&SE /2012 dated 11-7-2012 and Notification No. SO (PE) 4-5/SSRC/ Meeting/2012/Teaching Cadre dated 13-11-2012 and recommended by the departmental promotion committee District Swabi meeting held on 07-02-2013, the following Qaries (Male) BPS-12 are hereby upgraded to Senior Qaries posts BPS-15 Rs.(8500-700-29500) on the bases of 1/3rd ratio amongst total sanction strength of Qaries male under jurisdiction of this office with immediate effect.

Note:- 1. If any appeal received from any Qari regarding their seniority the junior most will be reverted to their original scale i-e B-12

2. Necessary entries may be made in the service books

3. An under taking may be obtained from the concerned teacher that any discrepancy was found in the award of B-15 and over payment made to him will be recovered from his pay, gravity and pension.

S#	S.L No	Name	Father Name	Place of Posting	Date of Birth	Date of appointment as Regular Qari	Awarded BPS
1	5	Muhammad Ghani	Jamal Ud Din	GHS Sheikh Dheri	20-02-1965	3/2/1985	15
2	6	Ihsan Ullah	Sadeeq Ullah	GHS Turlandi	28-03-1965	6/4/1985	15
3	10	Abidullah	Juma Gul	GHS Parmoli	10/4/1965	12/11/1986	15
4	20	Safdar Shah	Janab Shah	GHSS Ismaila	5/11/1964	19-10-1988	15
5	25	Fazlud deyan	Abdul Aziz	GHSS AKK	9/3/1970	19-11-1989	15
6	27	Fida Hussain	Ghulam Haidar	GHS Shahmansoor	4/3/1968	22-11-1989	15
7	30	Hussain Ali	Said Khan	GHS Tarakai	13-09-1965	11/3/1992	15
8	32	Shakir Ullah	Farhat Ullah	GHS Utla	5/12/1970	14-03-1992	15

Attested
Fazli
Head Master
G.H.S. No. 3
Yar Hussain (Swabi)

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9	36	Fazal Ghalib	Sultan	GHS Malik Abad	1/5/1970	3/5/1992	15
10	40	Abdul Jalal	Aziz Rahman Ur	GHS Sheragund	16-02-1974	25-04-1993	15
11	41	AttaUr Rahman	Mahboob Rahman Ur	GHS Bazar	1/1/1966	20-05-1993	15
12	43	Abdur Rahman	Bostan	GHS Spin Kani	1/10/1974	1/7/1997	15
13	45	Ubaid Ullah	Hamid Ullah	GHSS Bamkhel	8/6/1975	1/1/1998	15
14	46	Muhammad Abdullah	Said Akbar	GHS Beeka	20-4-1976	1/1/1998	15
15	48	Asad Ali	Afzal Khan	GHS Yar Husain No2	6/3/1974	4/6/1998	15
16	49	Husnul Wahab	Abdul Wahab	GHS Maneri Payan	17-04-1982	31-03-2004	15
17	50	Abid Mahmood	Mahmood Ullah	GHS Zarobi	2/12/1976	1/4/2004	15
18	51	Afsar Ali	Abdul Wahab	GHS No 1 Yar Husain	5/4/1979	1/4/2004	15
19	52	Hazrat Ali	Sabz Ali	GHS No 2 Salim Khan	4/5/1977	1/4/2004	15
20	53	Zain Ul Ahmad	Mir Taj	GHS Dalori	10/4/1982	1/4/2004	15
21	54	Ishaq Ali	Fazal Rahman	GHS No 1 Yar Hussain	3/2/1975	3/4/2004	15
22	56	Sadiq Rahman Ur	Azrat Khan	GHS Maneri Bala	5/1/1977	1/10/2005	15
23	57	Muhammad Sadiq	Muhammad Rafiq	GHS Topi	15-6-1986	1/10/2005	15
24	58	Muhammad Tariq	Said Badshah	GHS Gani Chatra	18-03-1982	3/11/2005	15
25	59	Muhammad Sareer	Abdullah Jan	GHS Hand	5/3/1980	21-03-2007	15
26	60	Maab Ahmad	Gul Mast Khan	GHS Tand Koi	10/5/1977	14-05-2007	15
27	61	Sajjad Hussain	Abdul Khanan	GHS Gajai	3/2/1979	15-05-2007	15

Attest
 Jazib
 Head Master
 G.H.S. No. 3
 Yar Husain (Khabli)

28	62	Amir Sultan	Sultan Hussain	GHS Managai	1/2/1988	15-05-2007	15
29	63	Abdul.Zahoor	Abdul.Qahar	GHS Pabaini	1/2/1983	16-05-2007	15

(39) (scribble)

(ABDUS SALAM)

DISTRICT EUDUCATION OFFICER

(MALE) SWABI

Endost;No. 453-6 /Seniority List Qari Male File Dated 11-02-2013

Copy of the above is to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
2. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
3. District Accounts Officer Swabi.
4. The Concerned Principals/ Head Masters noted above.
5. ADO(B&A) local Office
6. Superintendent Local Office
7. Official concerned



DISTRICT EUDUCATION OFFICER

(MALE) SWABI

Attest
Fazl
Head Master
G.H.S. No. 3
Yar Hussain (Swabi)

(No) (10)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE SWABI

NOTIFICATION

Consequent upon the Notification issued vide Government of Khyber Pakhtunkhwa Elementary and secondary Education Department vide no. SO (B&A) 1-18/ E&SE /2012 dated 11-7-2012 and Notification No. SO (PE) 4-5/SSRC/ Meeting/2012/Teaching Cadre dated 13-11-2012 and recommended by the departmental promotion committee District Swabi meeting held on 07-02-2013, and expected the appeal of Mr. Ali Nasar Khan Qari GHS Kalu Khan BPS-12 is hereby upgraded to Senior Qaries posts BPS-15 Rs.(8500-700-29500) on the bases of 1/3rd ratio amongst total sanction strength of Qaries male under jurisdiction of this office with immediate effect.

Note:- 1. If any appeal received from any Qari regarding their seniority the junior most will be reverted to their original scale i-e B-12

2. Necessary entries may be made in the service books

3. An under taking may be obtained from the concerned teacher that any discrepancy was found in the award of B-15 and over payment made to him will be recovered from his pay, gratuity and pension.

(ABDUS SALAM)

DISTRICT EDUCATION OFFICER

(MALE) SWABI

Endost; No. 963-69 /Seniority List Qari Male File Dated 26/03 /2013

Copy of the above is to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
2. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
3. District Accounts Officer Swabi.
4. The Concerned Principals/ Head Masters noted above.
5. ADO(B&A) local Office
6. Superintendent Local Office

Ali Nasar Khan
Ali Nasar Khan
PRINCIPAL
G.H.S Kalu Khan
Distt: Swabi
Ali Nasar Khan

Ali Nasar Khan
DISTRICT EDUCATION OFFICER

(MALE) SWABI

(41)

NOTIFICATION:

Consequent upon the approval given by the Departmental promotion committee in its meeting held at G.C.M.S bank road Mardan on 16-01-2013. The competent authority is pleased to promote the following Qaries of BPS-12 to Senior Qaries post in **BPS-15 (Rs. 8500 – 700 – 29500)** on Seniority-cum-fitness basis, vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. *SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:-* Dated 13/11/ 2012. With effect from 16-01-2013.

S.NO	Seniority No.	NAME	FATHER NAME	DESIGNATION	SCHOOL	Promoted As
01	04	S.M. Zakaria	S.M. Shakirullah Jan	Qari	GHS Gaddar	Senior Qari BPS-15
02	05	Abdul Rahman	Toti Rahman	Qari	GHSS Hathian	Senior Qari BPS-15
03	12	Fazal Rahim	Abdul Ghafoor	Qari	GCMHS Boys <i>B Mardan</i>	Senior Qari BPS-15
04	14	Hazrat Hussain	Roghan Shah	Qari	GHSS Baghdada	Senior Qari BPS-15
05	17	Muhammad Afzal	Mohib Shah	Qari	GHS Guli Bagh	Senior Qari BPS-15
06	21	M. Raza Shah	Muhammad Shafi	Qari	GHS jehangir Abad	Senior Qari BPS-15
07	25	Yahya Habib	Noor Ahmad Bag	Qari	GHS Kata Khat	Senior Qari BPS-15
08	32	Hafiz Bacha Gul	Ghulam Muhammad	Qari	GHSS No.1 Mardan	Senior Qari BPS-15
09	34	Mudassir Shah	Zahir Shah	Qari	GHS Babu Zai Mardan	Senior Qari BPS-15
10	36	Hazrat Umar	Shamsul Qamar	Qari	GHSS Mayar	Senior Qari BPS-15
11	37	Malik Taj	Ashraf Khan	Qari	GHSS Chamtar	Senior Qari BPS-15
12	39	Irfanullah	Mubarak Shah	Qari	GHS Garhi Kapura	Senior Qari BPS-15
13	44	Muhammad Ayaz	Fazal Dad	Qari	GHS Garhi Kapura	Senior Qari BPS-15
14	45	Muhammad Iqbal	Umara Khan	Qari	GHS Sikandari	Senior Qari BPS-15
15	48	Muhammad Darwesh	Mir Abdullah	Qari	GHS Garhi Daulatzai	Senior Qari BPS-15
16	53	Mehboob ur Rashid	Ghulam Sarwar	Qari	GHS Tambulak	Senior Qari BPS-15
17	54	Shah Faisal	M. Afsar Khan	Qari	GCMS Mardan <i>No-3</i>	Senior Qari BPS-15
18	55	Muhammad Tariq	Ghulam Sarwar	Qari	GHS Dheri Likpani	Senior Qari BPS-15
19	59	Muhammad Ilyas	Hafiz Zardullah	Qari	GHSS Mardan	Senior Qari BPS-15
20	60	Jehan Zeb	Manzoor	Qari	GHS Sowaryan Toru	Senior Qari BPS-15
21	61	Muhammad Rasool	Ghulam Rasool	Qari	GHS Qasmi	Senior Qari BPS-15
22	62	Akhtar Ali	Wazir Dad	Qari	GHS Sawal Dher	Senior Qari BPS-15
23	63	Hazrat Hussain	Khadim Hussain	Qari	GHS Seri Behlol	Senior Qari BPS-15
24	68	Muhammad Farooq	Taifoor Khan	Qari	GHS Gaddar	Senior Qari BPS-15



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) MARDAN

PHONE No.0937-9230151 – FAX-9230151

EMAIL:emismardan@yahoo.com

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S.NO	Seniority No	NAME	FATHER NAME	DESIGNATION	SCHOOL	Promoted As
25	69	Muhammad Hayat	Khairullah	Qari	GHS Katti Garhi	Senior Qari BPS-15
26	70	Asadullah	Hamdullah Shah	Qari	GHS Dakki Mardan	Senior Qari BPS-15
27	71	Muhammad Fazeel	Samiur Rehman	Qari	GHS Kandar	Senior Qari BPS-15
28	72	Liaqat Ali	Abdul Ghaffar	Qari	GHSS Baghicha Dheri	Senior Qari BPS-15
29	73	Hameed Ur Rehman	Habib ur Rehman	Qari	GHS Mohabbat Abad	Senior Qari BPS-15
30	74	Fazal Sher	Zarif Khan	Qari	GHS Kass Koroona	Senior Qari BPS-15
31	75	Ihsanullah	Amirullah	Qari	GHS Ghalla	Senior Qari BPS-15
32	76	Muhammad ayub	Muhammad Yaqub	Qari	GHS Kohi Barmol	Senior Qari BPS-15
33	77	Iftikhar Hussain	Faqeer Hussain	Qari	GHS Naseer Killi	Senior Qari BPS-15

Note: Necessary entry to this effect should be made in their Service Books subject to the verification of their FA / Hifaz sanad if not verified from the concerned Board / Madrassa.

(BAHADAR KHAN MARWAT)
DISTRICT EDUCATION OFFICER (Male)
MARDAN

Endst: No. 1026-30 /Qaries BPS-15 promotions file dated 2-2- /2013.

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

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Mardan.
3. Principal/Head Master concerned.
4. All Qaries concerned.
5. Gen:File.

Alexander
J.K.
Head Master
G.H.S. Kass Koroona
Mardan

[Signature]
DISTRICT EDUCATION OFFICER (Male)
MARDAN
1/2/2013
1/2/2013



GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
NO.BOV/FD/2-31/2012-13/Mardan
Dated Peshawar the 07/08/2012.

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To

The Secretary to Govt: of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department, Peshawar.

Subject: - UP-GRADATION OF GOVT:MIDDLE SCHOOLS TO HIGH LEVEL (MALE & FEMAL) DURING THE FINANCIAL YEAR 2012-13.

Dear Sir,

I am directed to refer to your department letter No. SO(B&A)2-41/09/ Mardan dated 16.07.2012 on the subject noted above and to state that Finance Department agrees to the upgradation of Govt: Middle School Sokai to High level in Disitric Mardan as developmental scheme, on Temporary Basis with effect from 1/9/2012 at a Total Cost of Rs.1,475,000/-. As per details given below, subject to the observance of all codal formalities.

Detail of Posts	
Headmaster/Mistress(B-17)	01
SET(B-16)	02
Qari/Qaria(B-12)	01
Junior clerk(B-07)	01
Chowkidar(B-01)	01
Lab Attendant(B-01)	01
Total Posts	07
A011-1 Pay of Officers	460,000/-
A011-2 Pay of other staff	224,000/-
A01202-House Rent All:	125,000/-
A01203-Conv: Allowance	145,000/-
A01207-Washing Allowance	10,000/-
A01208-Dress Allowance	10,000/-
A01217-Medical Allowce:	85,000/-
A0120X-Adhoc Allw 2010	209,000/-
A0121A-Adhoc Allw:2011	64,000/-
A012 -Adgic Allow:2012.	137,000/-
A0120D-Intigrated Allow:	3,000/-
Total Amounts	1,475,000/

1. The Expenditure involved is debitable to the Functional-cum-Object classification 09-Education Affairs & Services,092-Secondary Education Affairs & Services,0921-Secondary Education Affairs & Services,092101-Secondary Education and shall be met out from within Account-IV of the District concerned.

2. Audit Copy may please be prepared and sent to this Department for authentication.

Yours faithfully,

(JAMSHID KHAN HALEEMZAI)
BUDGET OFFICER-V.

ENDST; NO. & DATE AS ABOVE.

Copy forwarded to :-

1. The Director, Elementary & Secondary Education, Peshawar.
2. The District Coordination Officer, Mardan.
3. The Executive District Officer, Elementary & Secondary, Mardan.
4. The Executive District Officer (Finance & Planning), Mardan.
5. The Assistant Programmer-II, HR Wing, Finance Department.
6. Master File.

BUDGET OFFICER-V.

GOVT. OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
No. BOV/FD/2-31/2012-13/Mardan.
Dated Peshawar the 19/12/2012.

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To

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department, Peshawar.

Subject

UP-GRADATION OF GOVT. MIDDLE SCHOOL TO HIGH LEVEL (MALE & FEMALE) DURING THE FINANCIAL YEAR 2012-13.

Dear Sir,

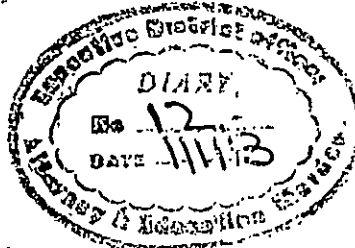
I am directed to refer to your Department letter No. SO(B&A)4-29/09/Mardan dated 03/12/2012 on the subject noted above and to state that Finance Department agrees to the up-gradation of Govt. Middle School Kuni to High level as developmental scheme, on Temporary Basis in District Mardan with immediate effect at a total cost of Rs. 1,020,000 as per details given below, subject to observance of all codal formalities:-

Detail of Posts	
Headmaster/Mistress(B-17)	01
SET(B-16)2 Science & 01 Arts	03
Qari/Qaria(B-12)	01
Junior clerk(B-07)	01
Chovkidar(B-01)	01
Lab Attendant(B-01)	01
Total Posts	07
A011-1 Pay of Officers	322,000
A011-2 Pay of other staff	156,800
A01202-House Rent All:	87,500
A01203-Conv: Allowance	101,500
A01207-Washing Allowance	0,700
A01208-Dress Allowance	0,700
A01217-Medical Allowance:	59,500
A0120X-Adhoc Allw 2010	146,300
A0121A-Adhoc Allw:2011	44,800
A012 -Adhoc Allow:2012.	97,900
A0120D-Intigrated Allow:	2,100
Total	1,020,000

2- The Expenditure involved is debitable to the Functional-cum-Object classification 9-Education Affairs and Services 091-Secondary Education Affairs and Services 0921-Secondary Education Affairs and Services 092101- Secondary Education A01- Total Employee Related Expenses and shall be met out from within Account-IV of the District concerned.

3- Audit Copy may please be prepared and sent to this Department for authentication.

Yours faithfully,



(JAMSHID KHAN HALEEMZAI)
BUDGET OFFICER-V.

Encl: No. & date as above.

Copy forwarded to:-

- 1- The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2- The District Coordination Officer, Mardan.
- 3- The Executive District Officer Elementary & Secondary Education, Mardan.
- 4- The Executive District Officer (Finance & Planning) Mardan.
- 5- The Assistant Programmer-II, HR Wing Finance Department.
- 6- Master File.

ADD (P&D)
Pl, enclosd to all concerned
11/12/2013

BUDGET OFFICER-V.



Ann, I

(45)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) SWABI
FORMAL SANCTION:-

Consequent upon the approval of the District Promotion Committee in its meeting held on 21.08.2006 in the light of existing rules and notification No.FD(SR-102-123)/2004 dated 13.08.2005.

In pursuance with the NWFP Finance Department letter No.FD(PRC)1-1/89 dated 07.08.1991. Sanction is hereby accorded to the grant of BPS-09 on passing FA Examination in Hind Division/three Advance Increments on BA in respect of the following Qari teachers with effect from the date noted against each.

S#	Name of Teacher	Desig:	School	Date of Award	BPS No	Remarks
1 ✓	Ishaq Ali	Qari	GHS Gajai	01-04-04 ✓	09	FA 2 nd Division
2	Abid Mahmood	Qari	GHS Zaroobi	01-04-04 ✓	09	FA 2 nd Division
3	Zainul Ahmad	Qari	GHS Narobancha	01-04-04 ✓	09	FA 2 nd Division
4	Muhammad Saddique	Qari	GHS Topi	01-10-05	09	FA 2 nd Division
5	Afsar Ali	Qari	GHS Pabani	01-04-04 ✓	09	FA 2 nd Division
6	Hunul Wahab	Qari	GMS Kaddi	31-03-04 ✓	09	FA 2 nd Division
7	Fayaz Ali	Qari	GHS Hund	01-04-04 ✓	09	FA 2 nd Division
8	Faizan Ullah	Qari	GHS Jalsai	01-04-04 ✓	09	FA 2 nd Division
9	Muhammad Tariq	Qari	GHS Qadra	03-11-05	09	FA 2 nd Division
10	Ismail Khan	Qari	GHS Lahor	01-04-04 ✓	09	FA 2 nd Division
11	Hazrat Ali	Qari	GHS Saleem Khan	01-04-04 ✓	09	FA 2 nd Division
12	Muhammad Atiq	Qari	GMS Mian Killi	07-12-00	09 Adv Inc:	BA

Notes:-

1. Necessary entry to this effect should be made in their Service Books.
2. An undertaking may be obtained from the teacher concerned to the effect that if any over payment is made in connection with the incorrect award of BPS-09/to him and detected later on, the same will be recovered from his salary/GPF/Pension etc.

(SAIFUR RAHMAN)
EXECUTIVE DISTRICT OFFICER
(SCHOOLS & LITERACY) SWABI

Encl: No. 2241-6 / Dated Swabi the 11/8/2006.

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

1. Principals/Headmistress of the concerned schools alongwith SF Books.
2. District Accounts Officer, Swabi.
3. Supdt: Local Office.
4. ADO (Establishment) Local Office.
5. Accounts Branch, Local Office.

EXECUTIVE DISTRICT OFFICER
(SCHOOLS & LITERACY) SWABI

Gul-P.P


(Signature)

To,

Director (E&S) Department
Govt. of Khyber Pakhtunkhawa,
Dabgari Garden Peshawar

And J
(46)

DEPARTMENTAL APPEAL


AMJAD ALI
Advocate
SUPREME COURT

Sir,

The appellants humbly submits as under;-

1. That appellants are equipped with qualifications such as Qirat Sanad, ^{Hifzul Quran} BA, MA, B.Ed, M.Ed
2. That the appellants were appointed against the post of Qaries in Government High Schools, Mardan & Swabi District of Khyber Pakhtunkhawa.
3. That Department is taking duty from the petitioners like other computer, SET Teachers.
4. That the appellants were appointed initially in BPS-7 in different years by the competent authority and presently serving in different High Schools of the province.
5. That after the appointment of the appellants their basic pay scale up graded to BPS-9, 10, 12, 14, 15 according to their qualifications and experience by different orders of the competent authority in different time.
6. That for BPS of Teachers the 1st Rules were framed in the year 1981, then 1991 wherein there are three basic categories of teachers.
 - a. Primary School Teachers
 - b. Middle School Teachers
 - c. High School Teachers

7. That according to the decision of the Govt: of Khyber Pakhtunkhawa a meeting of concerned officials was held on 01/06/2012, under the Chairmanship of respondent No. 05 for up gradation of the basic pay scales of all teachers of province.
8. That in the light of above stated meeting of concerned officials, the BPS of all the teachers in Province working in different categories/cadres were up graded by the order of Secretary Elementary & Secondary Education (E&S) Education, Department vide notification No SO (BQA)1-18 E QSE 2012 dated 11/07/2012.
9. That the above stated notification was then circulated to all the Executive District Officer in Khyber Pakhtunkhawa by the order of Deputy Director (Establishment) Elementary & Secondary Education.
10. That according to the above stated notification, the post of Qari has been up graded to BPS-12, whereas the post of the theology teacher (T.T) was up graded to BPS-15, who possess equal or less the same qualification.
11. That appellants filed appeals to Department that appellants be treated as par with Theology Teacher/ Arabic Teacher and other High School Teachers in matter of grade as since 1981, they were in the same grade being High School Teachers, but remained un-responded.
12. That impugned notification dated 11/07/2012 regarding the up gradation to the extent of the post of Qaries is illegal, void, and discriminatory as T.T are placed in BPS-15 and appellants in BPS-12, thus clear-cut violation of articles 4 and 25/27 of the Constitution of Islamic Republic of Pakistan, 1973, hence, this departmental appeal, inter alia, on the following grounds.

(48)

GROUNDS:-

- A.** Because the act of department with appellants is discriminatory, illegal, and void, hence untenable under the law.
- B.** Because according to the impugned notification all the posts of different categories and cadres have been up graded to BPS-15 and 16 in all the Govt: High Schools in Province except the post of the appellants, which has been up graded to BPS-12 instead of BPS-15 and BPS-16.
- C.** Because before the up gradation of basic pay scales of the impugned notification, the teachers of theology and the appellants were serving in the same different grades, which is also clear from the impugned notification, therefore, depriving of appellants from their legal/due rights in not only illegal, but also discriminatory.
- D.** Because in impugned notification, the department has not given any legal justification for not upgrading the post of the appellants equivalent to Theology Teacher (T.T) nor any criteria has been mentioned in this regard.
- E.** That appellants are not only Hafiz-ul-Quran, but also possess equal or more qualification then the teachers of theology in the relevant subject i.e. Islamyat and beside possess professional Teaching Degrees like B.Ed, M.Ed as well.
- F.** Because all the citizens of Pakistan are equal before the law and they are entitled to equal protection of law, hence impugned notification in respect of up gradation to the post of Qaries is also against Article 4 of Constitution of Islamic Republic of Pakistan, 1973.

- (49)
- G.** Because according to their lordship Superior Court of the country "All persons placed in similar circumstances must be treated alike" in famous case of I.A Sherwari 199 SCMR.
- H.** Because impugned notification to the extent of appellants' rights is clear cut violation of the law/principles settled by the Superior Courts, thus liable to be declared null and void, without lawful authority ultravires to the extent of not granted BPS-15 and 16 as granted to other High Schools Teachers.
- I.** Because appellants has been discriminated thereby violated Articles 25/27 of Constitution of Islamic Republic of Pakistan, 1973.
- J.** Because appellants are performing same duties upto same duration to the same classis of students in the same High School, possessing same qualification like T.T, A.T, SET, then placing T.T, A.T, SET in grade 15, 16, who were earlier in the same grade as appellants and depriving appellants of the same is clear discrimination.
- K.** Because it is not reasonable classification and is clear disparity.
- L.** Because no grounds for declaring these classes can be forwarded by concerned officials much less plausible.
- M.** Because Article 35 and Superior Courts including this Hon'ble Court presses equal social standards/ financials.
- N.** Because appellants and T.T/ AT are purchasing commodities from the same market at the same rate.
- O.** That any other grounds, which have not been taken specifically in the instant appeal, may be argued with the

permission of this Honourable Court at the time of arguments.

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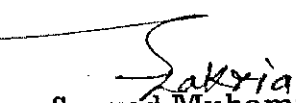
It is, therefore, most humbly prayed that on acceptance of this Departmental Appeal, notification dated 11/07/2012 issued by Secretary Elementary & Secondary Education (E&S) Education, Department, may please be modified by treating appellants at par with Theology Teacher/ Arabic Teacher i.e. BPS-15 as basic and BPS-16 as 1/3rd in Selection grade/ promotion as both are teaching to the same High School classes and were treated alike in past notifications of pay scales.


Any other relief deemed appropriate in the circumstances of the case, may also be graciously granted in favour of appellants.

APPELLANTS

1 
Fazal Sher

2 
Afsar Ali

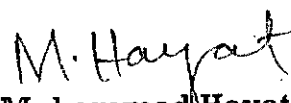
3 
Sayyed Muhammad Zakaria

4 
Muhammad Darvesh

5 
Hazrat Hussain

6 
Muhammad Iqbal

7 
Muhammad Ayaz

8 
Muhammad Hayat

9 
Mustaqim Shah

10 
Shrif Gul

11 
Fazal Hadi

12 
Gul Muhammad

13 Muhammad Ilyas

15 Muhammad Ayub

17 Mudassir Shah

19 Asad Ullah

21 Hazrat Hussain

23 Yahya Habib

25 Farhan

27 Ahmad Ali

29 Dildaruddin

31 Khair-ul-Wara

33 Asad Ali

35 Sahib Zada Aamir

37 Hussain Ali

14 Iftikhar Hussain

16 Asad Ur Rahman

18 Muhammad Rasool

20 Muhammad Farooq

22 Badar Munir

24 Shah Faisal

26 Muhammad Bilal

28 Kifayat-ur-Rahman

30 Sher Ali

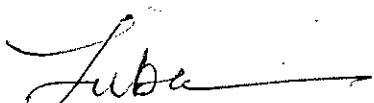
32 Ishaq Ali


34 Ali Nasir Khan

36 Ihsan Ullah

38 Sulaiman Said

(51)

39 
Muhammad Zubair

40 
Muhammad Abdullah

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41 
Ubaid Ullah

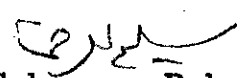
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Niaz Muhammad

43 
Shams-ul-Arifeen

44 
Maab Ahmad

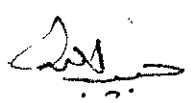
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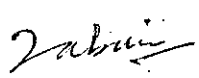
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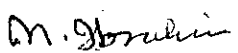
47 
Saleem-ur-Rahman

48 
Muhammad Ikram

49 
Muhammad Ali Khan

50 
Habib Ullah

51 
Zubair Ali


Muhammad Ibrahim

53 
Abid Mehmood

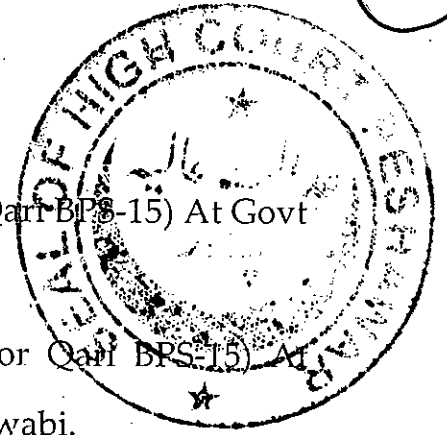
Dated 10/2/2015

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

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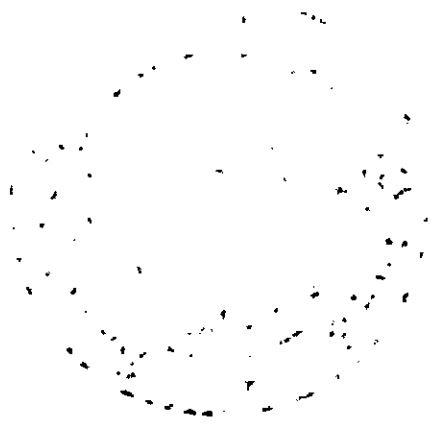
W.P No:- 2233-P /2014



1. Fazal Sher S/o Zarif Khan Posted as (Senior Qari BPS-15) At Govt High School KassKoroona District Mardan.
2. Afsar Ali S/o Abdul Wahab Posted as (Senior Qari BPS-15) At Govt High School YarHussain No.1 District Swabi.
3. Sayyed Muhammad Zakaria S/o Seyyed Muhammad Shakirullah Jan Posted as (Senior Qari BPS-15) At Govt High School Gaddar Mardan.
4. Muhammad Darvesh S/o Mir Abdullah Posted as (Senior Qari BPS-15) At Govt High School Garhi Daulat Zai District Mardan.
5. Hazrat Hussain S/o Roghan Shah Posted as (Senior Qari BPS-15) At Govt. Higher Secondary School Bughdada District Mardan.
6. Muhammad Iqbal S/o Umara Khan Posted as (Senior Qari BPS-15) At Govt. High School Sikandari District Mardan.
7. Muhammad Ayaz S/o Fazal Dad Posted as (Senior Qari BPS-15) At Govt. High School Garhi Kapura District Mardan.
8. Muhammad Hayat S/o Khair Ullah Posted as (Senior Qari BPS-15) At Govt. High School Kati Garhi District Mardan.
9. Mustaqim Shah S/o Abdul Hannan Posted as (Qari BPS-12) At Govt. High School Katlang District Mardan.
10. ShrifGuls/o Ahmad Shah Posted as (Qari BPS-12) At Govt. High School Badar Banda District Mardan.
11. Fazal Hadi S/o Syed Aftab Posted as (Qari BPS-12) At Govt. High School Babo Zai Katlang District Mardan.
12. Gul Muhammad S/o Muhammad Umar Posted as (Qari BPS-12) At Govt. High School Ibrahim Khan Kalli District Mardan.

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27 JAN 2015



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13. Muhammad Ilyas S/o Zard Ullah Posted as (Senior Qari BPS-15)
At Govt. Higher Secondary School No.4 District Mardan.
14. Iftikhar Hussain S/o Faqir Hussain Posted as (Senior Qari BPS-15)
At Govt. High School Naseer Kalli District Mardan.
15. Muhammad Ayub S/o Muhammad Yaqub Posted as (Senior Qari
BPS-15) At Govt. Higher Secondary School Kohi Barmol District
Mardan.
16. Asad Ur Rahman S/o Hazrat Jan Posted as (Qari BPS-12) At Govt.
High School Jalala District Mardan.
17. Mudassir Shah S/o Zahir Shah Posted as (Senior Qari BPS-15) At
Govt. High School Babuzai District Mardan.
18. Muhammad Rasool S/o Ghulam Rasool Posted as (Senior Qari
BPS-15) At Govt. High School Qasmi District Mardan.
19. Asad Ullah S/o Hamdullah Shah Posted as (Senior Qari BPS-15)
At Govt. High School Dakki District Mardan.
20. Muhammad Farooq S/o Taifoor Khan Posted as (Senior Qari
BPS-15) At Govt. High School Gaddar District Mardan.
21. Hazrat Hussain S/o Khadim Hussain Posted as (Senior Qari BPS-
15) At Govt. High School Seri Behlol District Mardan.
22. Badar Munir S/o Sangi Marmar Posted as (Qari BPS-12) At Govt.
High School Sharqi Hoti District Mardan.
23. Yahya Habib S/o Noor Ahmad Bag Posted as (Senior Qari BPS-
15) At Govt. High School Kata Khat District Mardan.
24. Shah Faisal S/o Muhammad Afsar Khan Posted as (Senior Qari
BPS-15) At Govt. Centennial Model School No.3 District Mardan.
25. Farhan S/o Muhammad Javid Posted as (Qari BPS-12) At Govt.
High School Seri Behlol District Mardan.
26. Muhammad Bilal S/o Hussain Gul Posted as (Qari BPS-12) At
Govt. Higher Secondary School Shehbaz Garhi District Mardan.

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27 JAN 2015

27. Ahmad Ali S/o Fazle Rabbi Posted as (Qari BPS-12) At Govt. High School Guli Bagh Sawal Dher District Mardan.
28. Kifayat-ur-Rahman S/o Faizuddin Posted as (Qari BPS-12) At Govt. High School Gujrat District Mardan.
29. Dildaruddin S/o Siyar Din Posted as (Qari BPS-12) At Govt. High School Bakhshali District Mardan.
30. Sher Ali S/o Wali Baz Posted as (Qari BPS-12) At Govt. High School Palo Dheri District Mardan.
31. Khair-ul-Wara D/o Muhammad Haleem Posted as (Qaria BPS-12) At Govt. Girls High School Kohi Barmol District Mardan.
32. Ishaq Ali S/o Fazli Rahman Posted as (Senior Qari BPS-15) At Govt. High School Yar Hussain No.1 District Swabi.
33. Asad Ali S/o Afzal Khan Posted as (Senior Qari BPS-15) At Govt. High School Yar Hussain No.3 District Swabi.
34. Ali Nasir Khan S/o Ubaid Khan Posted as (Qari BPS-12) At Govt High School Kalu Khan District Swabi.
35. Sahib Zada Aamir Sultan S/o Sahib Zada Sultan Hussain Posted as (Senior Qari BPS-15) At Govt. High School Managi District Swabi.
36. Ihsan Ullah S/o Siddiq Ullah Posted as (Senior Qari BPS-15) At Govt High School Turlandi District Swabi.
37. Hussain Ali S/o Said Khan Posted as (Senior Qari BPS-15) At Govt. High School Tarakai District Swabi.
38. Sulaiman Said S/o Mukhtiar Said Posted as (Qari BPS-12) At Govt. High School Jagan Nath District Swabi.
39. Muhammad Zubair S/o Fazli Wahab Posted as (Qari BPS-12) At Govt. High School Gohar Abad Ismaila District Swabi.
40. Muhammad Abdullah S/o Said Akbar Posted as (Senior Qari BPS-15) At Govt. High School Beka District Swabi.

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- (56)
- X 41. Ubaid Ullah S/o Hamd Ullah Posted as (Senior Qari BPS-15) At Govt. Higher Secondary School Bam Khel District Swabi.
42. Niaz Muhammad S/o Sultan Muhammad Posted as (Qari BPS-12) At Govt. High School Baja District Swabi.
43. Shams-ul-Arifeen S/o Abdul Waris Posted as (Qari BPS-12) At Govt. High School Swabi District Swabi.
44. Maab Ahmad S/o Gul Mast Khan Posted as (Senior Qari BPS-15) At Govt Higher Secondary School Thand Koi District Swabi.
45. Mazhar-ul-Hassan S/o FakhrUl Hassan Posted as (Qari BPS-12) At Govt. High School No.1 Tordher District Swabi.
46. Abdul Zahoor S/o Abdul Qahar Posted as (Senior Qari BPS-15) At Govt. High School Pabaini District Swabi.
47. Saleem-ur-Rahman S/o Khalil-ur-Rahman Posted as (Qari BPS-12) -At Govt. High School Pabaini District Swabi.
48. Muhammad Ikram S/o Muhammad Posted as (Qari BPS-12) At Govt. High School PanjPir District Swabi.
- X 49. Muhammad Ali Khan S/o Miro Khan Posted as (Qari BPS-12) At Govt. High School No.2 Maneri Payan District Swabi.
50. Habib Ullah S/o Sadeeq Ullah Posted as (Qari BPS-12) At Govt. Higher Secondary School Mansabdar District Swabi.
51. Zubair Ali S/o Muhammad Umer Posted as (Qari BPS-12) At Govt. High School No.1 Tordher District Swabi.
52. Muhammad Ibrahim S/o Abdur Rahim Posted as (Qari BPS-12) At Govt. High School Jalsai District Swabi.
- X 53. Abid Mehmood S/o Mehmood Ullah Posted as (Senior Qari BPS-15) At Govt. High School Zarobi District Swabi.

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11 SEP 2014

..... Petitioners

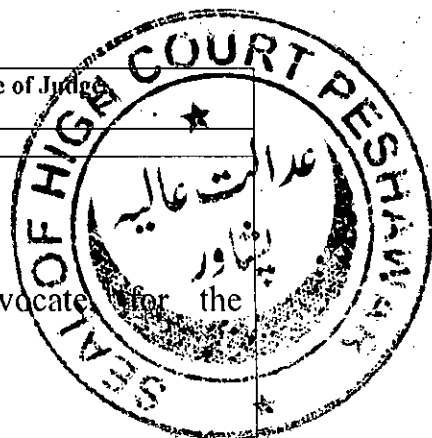
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EXAMINER
Peshawar High Court
27 JAN 2015

PESHAWAR HIGH COURT, PESHAWAR

(87)

FORM OF ORDER SHEET

Date of Order or Proceedings	Order of other Proceedings with Signature of Judge
22.01.2015	<p data-bbox="471 519 796 558"><u>W.P.No. 2733-P/2014.</u></p> <p data-bbox="471 608 1292 690">Present: Mr. Amjad Ali, Advocate for the petitioners.</p> <p data-bbox="832 690 937 715">*****</p> <p data-bbox="471 848 1303 1531"><u>ABDUL LATIF KHAN, J.-</u> Through the instant petition, the petitioners have prayed that on acceptance of this petition notification dated 11.07.2012 issued by the respondents may please be modified by treating the petitioners at par with Theology Teacher / Arabic Teacher i.e. BPS-15 as basic and BPS-16 as 1/3rd in Selection grade / promotion as both are teaching to the same High School classes and were treated alike in past notification of pay scales.</p> <p data-bbox="471 1569 1303 2249">2. Brief facts leading to the instant petition are that the petitioners, being qualified with Qirat Sanad, were initially appointed against the post of Qaries in Government High Schools at District Mardan & Swabi in BPS-7 while the respondents are taking duties from them like other computer, SET Teachers, however, after appointment of the petitioners their basic pay scales were upgraded to BPS-09, 10, 12, 14 & 15 according to their qualifications and experience by different orders of the</p>



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competent authority. According to the decision of the Government of Khyber Pakhtunkhwa a meeting of the respondents was held on 01.06.2012 under the Chairmanship of respondent No.5 for up-gradation whereby the basic pay scales of all the teachers in the Province working in different categories / cadres were up-graded by the order of respondent No.1 vide Notification No. SO(BQA)1-18-E QSE 2012 dated 11.07.2012. In light of the aforesaid notification, the post of Qari was up-graded to BPS-12 while the post of theology teacher was upgraded to BPS-15 despite the fact that both of them possess equal or less the same qualification. Upon which the petitioners approached the competent authority by filing a departmental appeal with the claim that the petitioners be also treated at par with Theology Teacher / Arabic Teacher as since 1981 they were in the same grade being High School Teachers but remained unresponded, hence, they filed the instant petition and prayed that the impugned notification dated 11.07.2012 regarding the up-gradation to the extent of the post of Qaries is illegal, void and discriminatory as T.T are placed in BPS-15 and petitioners in BPS-12, which is the clear-cut violation of Article 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan.

2. The grievance of the petitioners in essence is their up-gradation but without going into the legality or

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otherwise of the Notification dated 11.07.2012, undoubtedly the same falls squarely within the domain of the Federal Services Tribunal and this court cannot intervene in such like matters in view of the explicit bar contained in Article 212 (2) of the Constitution of the Islamic Republic of Pakistan, 1973.

For reasons stated above, this writ petition being not pressed, dismissed as withdrawn.

sd/ Abdul Latif Khan
sd/ syed Ahsan Shah

JUDGE

JUDGE

miss
21/1/15

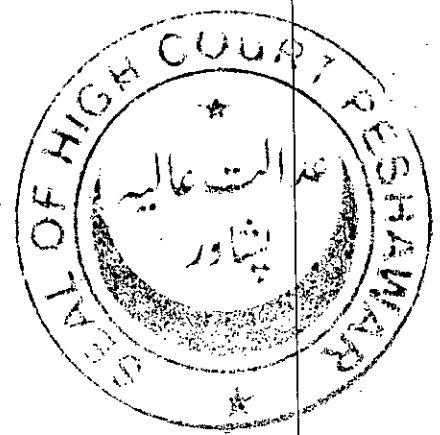
CERTIFIED TO BE TRUE COPY

Examined
Peshawar High Court Peshawar
Authorized under Article 87 of
The Qanun-e-Judikat Order 1984

27 JAN 2015

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Date of Presentation of Application: 27-1-15
No. of Pages: 17 P
Copying Fee: /
Stamp Fee: /
Total: 34.00
Date of Preparation of Copy: 27-1-15
Date Given for Delivery: 27-1-15
Date of Delivery of Copy: 27-1-15
Received By: J. N. B. 911



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

Service Appeal No: 503 /2015.

Fazal Sher Qari (BPS-15)GHS Kass Koroona District Mardan.Appellant

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.Respondents

PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action / locus standai.
- 2 That the instant Service Appeal is badly time barred. Hence is liable to be dismissed.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal. Hence liable to be dismissed.
- 4 That the instant Service Appeal is against the relevant provisions of law.
- 5 That the Appellant is not an aggrieved person under article 212 of the constitution of the Islamic Republic of Law of Pakistan 1973.
- 6 That the Appellant has filed the instant appeal on malafide intentions just to put extra ordinary pressure on the Respondents for the grant of illegal & even unauthorized service benefits.
- 7 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 8 That the instant appeal is liable to be dismissed for mis-joinder & non-joinder of the necessary parties to the present appeal.
- 9 That the Appellant is estopped by his own conduct to file the instant appeal.
- 10 That the instant Service Appeal is not maintainable in the present circumstances of the case.
- 11 That the Notification No: SO(B&A) 1-18/ E&SED/ 2012 dated 11-07-2012 & Notification dated 13-11-2012 are legally competent & liable to be maintained in favour of the Respondents in the interest of justice.
- 12 That this Honorable Tribunal has got no jurisdictions to entertain the instant Service Appeal being pertains to the policy.
- 13 That the Appellant has been treated as per laws, rules & relevant policy in the instant case.
- 14 That the Appellant is not entitled for the grant of relief he has sought from this Honorable Tribunal in the instant appeal.

- 15 That the instant Appeal is barred by law.
- 16 That no departmental appeal has been filed by the appellant.

ON FACTS.

- 1 That Para-1 needs no comments being pertains to the Academic record of the appellant.
- 2 That Para-2 is also needs no comments being pertains to the transfer & postings against the Qari post.
- 3 That Para-3 is incorrect & denied. The statement of the appellant with regard to the performance of duty is without any legal justification on the ground that U/S-2(b) of Civil Servant Acts 1973, every civil servant is legally & morally is bound to performed his delegated official duty against the post he holds & paid for the services against them by the Respondent Department.
- 4 That Para-4 needs no comments being pertains to the transfer & postings of the appellant against the Qari post in the Respondent Department which is not disputed in the given circumstances of the case.
- 5 That Para-5 is correct to the extent that the appellant alongwith other officials of teaching cadre have been upgraded by the Provincial Govt: from time to time in which the scale of appellant from BPS-07 to 12 has been upgraded by the Respondent Department in the light of the onetime upgradation of scale of the Provincial Govt:.
- 6 That Para-6 is incorrect & denied . The Respondents are bound to follow & implement the current impugned policy of the Provincial Govt: in its true letter & spirit
- 7 That Para-7 is correct to the extent that the Basic Pay Scales for the initial recruitments of PST, CT & Qari have been upgraded to BPS-12 respectively vide Notification dated 01-6-2012, by the Respondent No: 1.
- 8 That Para-8 is incorrect & misleading on the grounds that the referred Notification dated 11-07-2012 has not been issued in the light of the above mentioned Notification dated 01-06-2012 with the submission that the later Notification is for the initial recruitment of various teaching & non-teaching cadre posts whereas the Notification dated 11-07-2012 the post of the appellant has been re designated as Senior Qari post in BPS-15 under the formula of 1/3 of the total Qaries post have been upgraded which will be filled in the manner as may be prescribed by the E&SE Department by making necessary service rules or amending the existing service rules if any for the post.
- 9 That Para-9 needs no comments.
- 10 That Para-10 is incorrect & denied on the grounds that the prescribed qualification for the appointment against the Qari post in BPS-12, is FA / F.Sc & Asnad in Hafiz-E-Quran & Qirat from the dully recognized Board/Deeni Madrassa, whereas the prescribed qualification for the initial appointment against the TT in BPS-15 post is SSC alongwith the relevant qualification of Shahadat-ul-Almiya or MA in Islamiyat from dully recognized Institutions of the country in the light of the Notification dated 13-11-2012 issued by the Respondent Department(copies of the relevant Notifications are attached as Annexures- A, B & C).
- 11 That Para-11 is incorrect & denied, no Departmental appeal has been filed by the appellant against the impugned Notification dated 11-07-2012, with the additional submission that the post of the appellant does not fall within the ambit of teaching cadre in the Respondent Department as per Notification dated 13-11-2012.

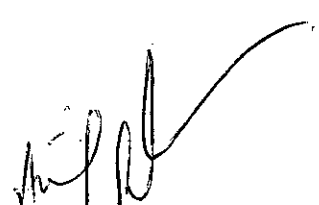
- 12 That Para-12 is incorrect & denied. The appellant has been treated as per law, rules & in accordance with the prescribed policy as mentioned above having no question of violation of the mentioned article of the Constitution of 1973.
- 13 That Para-13 is correct that the W/P No: 2733-P/2014 under titled Fazal Sher & others Versus Government has been dismissed vide order dated 20-01-2015 in favour of the Respondent Department by the Honorable Peshawar High Court Peshawar in the interest of justice.
- 14 That Para-14 is legal, however the Respondents further submit on the following grounds inter alia:-


ON GROUNDS.

- A That ground-A is incorrect & denied. The act of the Respondents with regard to the impugned Notification dated 11-07-2012 is legally competent & liable to be maintained in favour of the Responding Department.
- B That ground -B is incorrect & denied. The appellant has been treated as per law, rules & policy in the instant matter in the light of the Notifications dated 11-7-2012 & 13-11-2012 by the Respondents.
- C That ground-C is incorrect & denied. The statement of the appellant is baseless on the grounds that both the cadres are different in job & nature. Hence both cannot be treated at par under the above mentioned Notification.
- D That ground-D is incorrect & denied. The impugned Notification is within legal sphere & justification, hence is liable to be maintained in favour of the Respondents .
- E That ground-E needs no comments being pertains to the academic of the appellant.
- F That ground-F is incorrect & misleading. The appellant has been treated as per law, rules & policy in the instant case.
- G That ground-G is incorrect & denied. The cited judgment is not applicable on the case of the appellant.
- H That ground-H is incorrect & denied. Detailed reply has been given above.
- I That ground-I is incorrect. The appellant has not been discriminated in the instant case by the Respondents.
- J That ground-J is also incorrect on the grounds that every civil servant is supposed to perform his duty against the post he holds in the Respondent Department.
- K That ground-K is incorrect & denied, hence no further comments.
- L That ground-L is incorrect. Detailed reply has been given in above paras. Hence no further comments.
- M That ground-M is incorrect & denied. The appellant has been treated in accordance with law, rules & policy in the instant case by the Respondents.
- N That ground-N needs no comments, being pertains to the domestic problems of the appellant.
- O That ground-O is incorrect & denied. The appellant has been treated as per law, rules & Policy in accordance with his cadre in the Respondent Department.

- P That ground-P is incorrect & denied. Detailed reply has been given in the foregoing paras. Hence needs no further comments.
- Q That ground-Q is incorrect & denied. The post of the DM is not a teaching cadre post in the Respondent Department.
- R That ground-R is incorrect. Detailed reply has been given in ground Q.
- S That ground-S is incorrect & denied. Hence no further comments.
- T That ground-T is incorrect & misleading, hence no further comments.
- U That ground-U is incorrect & denied, hence no further comments.
- V That ground-V is legal, however the Respondents seek leave of this Honorable Tribunal to submit additional grounds and case law at the time of arguments.


In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the Respondent Department.


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


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

AFFIDAVIT

I, Khaista Rehman Asstt: Director (Litigation-II) do hereby solemnly affirm and declare that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief & that nothing has been concealed from the ambit of this Honorable Tribunal in the titled Service Appeal.


Deponent



GOVERNMENT OF
KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar, 11.07.2012

NOTIFICATION:

No. SO (B & A) /1-18/E&SE/2012: Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

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Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
Senior Primary School Teach. (Sr. PST)	"do"	Newly Upgraded/ Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	20,804 posts of the existing PST's (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Certified Teachers (CT)	Govt. Middle/High/Higer Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Arabic Teachers (AT)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Drawing Masters (Sr. DM-1)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	one thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

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Physical Education Teachers (PET's)	"do"	BS-09	(BPS-15)	All the existing posts of PETs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
		BS-10		
		BS-12		
		BS-14		
		BS-15		
Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PETs posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Qari/Qaria	"do"	BPS-7	(BPS-12) //	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
		BPS-9		
		BPS-10		
		BPS-12		
		BPS-14		
Sr. Qari/Sr. Qaria	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07/2012

Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers

SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date:-

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

(NOOR ALAM KHAN WAZIR)
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

11/07/2012

NOTIFICATION

Consequent upon the Notification issued vide Government of Khyber Pakhtunkhwa Elementary and secondary Education Department vide no. SO (B&A) 1-13/ E&SE /2012 dated 11-7-2012 and Notification No. SO (PE) 4-5/SSRC/ Meeting/2012/Teaching Cadre dated 13-11-2012 and recommended by the departmental promotion committee District Swabi meeting held on 07-02-2013, the following Qaries (Male) BPS-12 are hereby upgraded to Senior Qaries posts BPS-15 Rs. (6500-700-29500) on the bases of 1/3rd ratio amongst total sanction strength of Qaries male under jurisdiction of this office with immediate effect.

Note:- 1. If any appeal received from any Qari regarding their seniority the junior most will be reverted to their original scale i.e B-12

2. Necessary entries may be made in the service books

3. An under taking may be obtained from the concerned teacher that any discrepancy was found in the award of B-15 and over payment made to him will be recovered from his pay, gravity and pension.

S#	S.L No	Name	Father Name	Place of Posting	Date of Birth	Date of appointment as Regular Qari	Awarded BPS
1	5	Muhammad Ghani	Jamal Ud Din	GHS Sheikh Dheri	20-02-1965	3/2/1985	15
2	6	Ihsan Ullah	Sadeeq Ullah	GHS Turlandi	28-03-1965	6/4/1985	15
3	10	Abidullah	Juma Gul	GHS Parmoli	10/4/1965	12/11/1986	15
4	20	Safdar Shah	Janab Shah	GHSS Ismaila	5/11/1964	19-10-1988	15
5	25	Fazlud deyan	Abdul Aziz	GHSS AKK	9/3/1970	19-11-1989	15
6	27	Fida Hussain	Ghulam Haidar	GHS Shahmansoor	4/3/1968	22-11-1989	15
7	30	Hussain Ali	Said Khan	GHS Tarakai	13-09-1965	11/3/1992	15
8	32	Shakir Ullah	Farhat Ullah	GHS Utla	5/12/1970	14-03-1992	15

Attested
 Fazlud deyan
 Head Master
 G.H.S. No. 3
 Yar Hussain (Swabi)

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9	38	Fazal Ghalib	Sultan	GHS Malik Abad	1/5/1970	3/5/1992	15
10	40	Abdul Jalal	Aziz Rahman Ur	GHS Sheragund	16-02-1974	25-04-1993	15
11	41	AttaUr Rahman	Mahboob Rahman Ur	GHS Bazar	1/1/1966	20-05-1993	15
12	43	Abdur Rahman	Bostan	GHS Spin Kani	1/10/1974	1/7/1997	15
13	45	Ubaid Ullah	Hamid Ullah	GHSS Bamkhel	8/6/1975	1/1/1998	15
14	46	Muhammad Abdullah	Said Akbar	GHS Beeka	20-4-1976	1/1/1998	15
15	48	Asad Ali	Afzal Khan	GHS Yar Husain No2	6/3/1974	4/6/1998	15
16	49	Husnul Wahab	Abdul Wahab	GHS Maneri Payan	17-04-1982	31-03-2004	15
17	50	Abid Mahmood	Mahmood Ullah	GHS Zarobi	2/12/1976	1/4/2004	15
18	51	Afsar Ali	Abdul Wahab	GHS No. 1 Yar Husain	5/4/1979	1/4/2004	15
19	52	Hazrat Ali	Sabz Ali	GHS No 2 Salim Khan	4/5/1977	1/4/2004	15
20	53	Zain Ul Ahmad	Mir Taj	GHS Dalori	10/4/1982	1/4/2004	15
21	54	Ishaq Ali	Fazal Rahman	GHs No 1 Yar Hussain	3/2/1975	3/4/2004	15
22	56	Sadiq Rahman Ur	Azrat Khan	GHS Maneri Bala	5/1/1977	1/10/2005	15
23	57	Muhammad Sadiq	Muhammad Rafiq	GHS Topi	15-6-1986	1/10/2005	15
24	58	Muhammad Tariq	Said Badshah	GHS Gani Chatra	18-03-1982	3/11/2005	15
25	59	Muhammad Sareer	Abdullah Jan	GHS Hand	5/3/1980	21-03-2007	15
26	60	Maab Ahmad	Gul Mast Khan	GHS Tand Koi	10/5/1977	14-05-2007	15
27	61	Sajjad Hussain	Abdul Khanan	GHS Gajai	3/2/1979	15-05-2007	15

Attested
Jad
Head Master
G.H.S. No. 3
Yar Husain (Bambh)

28	62	Amir Sultan	Sultan Hussain	GHS Managai	1/2/1988	15-05-2007	15
29	63	Abdul Zahoor	Abdul Qahar	GHS Pabaini	1/2/1983	16-05-2007	15

(39) (91)

(ABDUS SALAM)

DISTRICT EDUCATION OFFICER

(MALE) SWABI

Enclos: No. 453-6 /Seniority List Qari Male File Dated 11-02-2013

Copy of the above is to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
2. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
3. District Accounts Officer Swabi.
4. The Concerned Principals/ Head Masters noted above.
5. ADO(B&A) local Office
6. Superintendent Local Office
7. Official concerned



DISTRICT EDUCATION OFFICER

(MALE) SWABI

Attest
 For
 Head Master
 G.H.S. No. 8
 Yari Hussain (Swabi)

(No) (120)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE SWABI

NOTIFICATION

Consequent upon the Notification issued vide Government of Khyber Pakhtunkhwa Elementary and secondary Education Department vide no. SO (B&A) 1-18/ E&SE /2012 dated 11-7-2012 and Notification No. SO (PE) 4-5/SSRC/ Meeting/2012/Teaching Cadre dated 13-11-2012 and recommended by the departmental promotion committee District Swabi meeting held on 07-02-2013, and expected the appeal of Mr. Ali Nasar Khan Qari GHS Kalu Khan BPS-12 is hereby upgraded to Senior Qaries posts BPS-15 Rs.(8500-700-29500) on the bases of 1/3rd ratio amongst total sanction strength of Qaries male under jurisdiction of this office with immediate effect.

Note:- 1. If any appeal received from any Qari regarding their seniority the junior most will be reverted to their original scale i-e B-12

2. Necessary entries may be made in the service books

3. An under taking may be obtained from the concerned teacher that any discrepancy was found in the award of B-15 and over payment made to him will be recovered from his pay, gratuity and pension.

(ABDUS SALAM)

DISTRICT EDUCATION OFFICER

(MALE) SWABI

Encl: No. 963-69 /Seniority List Qari Male File Dated 26/03 /2013

Copy of the above is to the :-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar
2. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
3. District Accounts Officer Swabi.
4. The Concerned Principals/ Head Masters noted above.
5. ADO(B&A) local Office
6. Superintendent Local Office

[Signature]
 PRINCIPAL
 G.H.S Kalu Khan
 Distt: Swabi
[Signature]

[Signature]
 DISTRICT EDUCATION OFFICER
 (MALE) SWABI

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No.503/2015

Fazal Sher Qari **VERSUS** Secretary E& SE Department,
Khyber Pakhtunkhwa & Others.

REJOINDER ON BEHALF OF APPELLANT.

Appellant humbly submitted as under

RESPECTFULLY SHEWETH:-

PRELIMINARAY OBJECTIONS

All the preliminary objections are incorrect, misconceived. Denied.

ON FACTS:-


All the paras of appeal are correct and those of reply are incorrect. Denied. Appeal is maintainable on all score, as mp rules/policy can be framed in violation of Article-4, 25/27 of Constitution of Pakistan 1973 as all are to be treated equally. It is not a matter of transfer but regularly teaching in Middle/High School.

It is therefore humbly requested that appeal may please be accepted.

Dated : 09/06/2016


Appellant

Through


Amjad Ali Advocate
Supreme court of
Pakistan

AFFIDAVIT

I, do hereby solemonly declare and verify that the contents of the rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


Deponent

