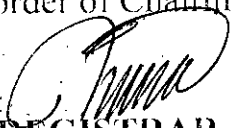


FORM OF ORDER SHEET

Court of _____

Appeal No. 586/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/04/2024	<p>The appeal of Mr. Abdul Jalil resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 24.04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

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

SERVICE APPEAL NO. _____/2024

Abdul Jalil

V/S

Education Department

**APPLICATION FOR FIXING THE INSTANT
APPEAL AT PRINCIPLE SEAT AT PESHAWAR.**

RESPECTFULLY SHEWETH:

1. That the appellant has filed the instant appeal in this Honorable Service Tribunal against the notification dated 08.12.2023, whereby the appellant was promoted to the post of SST (BS-16) in Physics/Maths group under 40% promotion quota of SCT/CT with immediate effect instead of 22.04.2021 i.e the date on which the post of SST (BPS-16) in Physics/Maths group was vacant/available under 40% promotion quota and against not taking action on the departmental appeal of the appellant within the statutory period of ninety days.
2. That instant appeal is in the jurisdiction of Camp Court Abbottabad of this Honorable Tribunal, but the appellant engaged counsel who is doing legal practice at Peshawar and the appellant also wants to peruse his case at principle seat at Peshawar.
3. That it will be convenient for the appellant as well as for his counsel if the instant appeal is fix at principle seat at Peshawar.

It is therefore most humbly prayed that on the acceptance of this application, the instant appeal may kindly be fixed at principle seat at Peshawar of this Honorable Tribunal.

APPELLANT

THROUGH:

TAIMUR ALI KHAN

ADVOCATE HIGH COURT

The appeal of Mr. Abdul Jalil received today i.e on 05.04.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Affidavit is not attested by the Oath Commissioner.
- 4- Annexures of the appeal are not unattested.
- 5- Annexure-D of the is illegible.
- 6- Three more copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 270 /S.T,

Dt. 8/4 /2024.


8/4/24

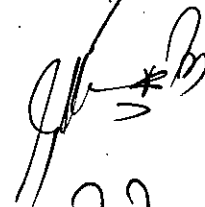
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Taimur Ali Khan Adv.
High Court Peshawar.

Respected Sir

- | | |
|--------------------|----------|
| i - objection 01 | Removed |
| ii - objection 02 | Removed. |
| iii - objection 03 | Removed. |
| iv - objection 04 | Removed |
| v - objection 05 | Removed |
| vi - objection 06 | Removed |

Resubmitted after codal formalities



22-04-2024.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 586 /2024

Abdul Jalil

V/S

Education Deptt.

INDEX

S.No.	Documents	Annexure	P. No.
1	Memo of Appeal	-----	
2	Affidavit	-----	
3	Copy of documents and appointment notification and regularization notification	A,B&C	08-12
4	Copy of notification/rules dated 24.07.2014	D	13-19
5	Copies of notification dated 13.05.2020, notification dated 16.04.2021 and notification 21.04.2021	E,F&G	20-24
6	Copies of notification dated 29.07.2021 and memo dated 01.08.2021	H&I	25-26
7	Copies of departmental appeal and letter dated 06.02.2023	J&K	27-28
8	Copies of service appeal and order sheet dated 22.02.2023	L&M	29-35
09	Copies of memo of writ petition and order/judgment dated 21.09.2023	N&O	36-52
10	Copy of notification dated 08.12.2023	P	53-55
11	Copy of departmental appeal	Q	56
12	Copy of notification dated 29.10.2021	R	57
13	Vakalat Nama	-----	58

THROUGH:

APPELLANT


TAIMUR ALI KHAN
(ADVOCATE HIGH COURT)

Cell# 0333-9390916

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. SB6 /2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12154

Dated 05.04.2024

Abdul Jalil, SST (Physics/Maths) BPS-16,
GHS Bartooni, District Torghar.

(APPELLANT)

VERSUS

1. The Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa, Civil secretariat, Peshawar.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Civil secretariat, Peshawar.
3. The District Education Officer (Male) Torghar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE NOTIFICATION DATED 08.12.2023, WHEREBY THE APPELLANT WAS PROMOTED TO THE POST OF SST (BS-16) IN PHYSICS/MATHS GROUP UNDER 40% PROMOTION QUOTA OF SCT/CT WITH IMMEDIATE EFFECT INSTEAD OF 22.04.2021 I.E THE DATE ON WHICH THE POST OF SST (BPS-16) IN PHYSICS/MATHS GROUP WAS VACANT/AVAILABLE UNDER 40% PROMOTION QUOTA AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

Filed to-day

Registrar

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE APPELLANT MAY KINDLY BE CONSIDERED FOR ANTEDEDATION OF HIS PROMOTION TO THE POST OF SST (BPS-16) IN PHYSICS/MATHS GROUP WITH EFFECT FROM 22.04.2021, THE DATE WHEN THE POST OF SST

(BPS-16) IN PHYSICS/MATHS GROUP WAS AVAILABLE FOR PROMOTION BY MODIFYING THE NOTIFICATION DATED 08.12.2023 TO THAT EXTENT TO THE EXTENT OF THE APPELLANT WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS HONORABLE TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWTH:
FACTS:

1. That the appellant is well qualified having MA, MEd degree and was appointed as CT teacher in Physics/Maths group in the respondent department on 09.04.2016 and his service was regularized from the date of his appointment vide notification dated 29.05.2019. The appellant since his appointed is performing his duty with devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performing. **(Copy of documents and appointment notification and regularization notification are attached as Annexure-A,B&C)**
2. That the department issued a Notification/Rules on 24.07.2014, wherein the post of SST (BPS-16) can be filled through 75% promotion quota on the basis of seniority-cum-fitness from the concerned District and 75% promotion quota was further bifurcate in the manner that 40% quota from amongst the Senior Certified Teacher (BPS-16) with at least five years' service as Senior Certified Teacher and Certified Teacher having qualification of second class Bachelor degree from recognized University from the groups with two subjects with Chemistry, Botany or Zoology or Physics, Maths "A" "B" or Statistics or Humanities or other equivalent group at degree level with English as Compulsory subject and Bachelor of Education or Master of Education provided that if no suitable candidate is available from amongst Senior Certified Teacher for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teacher, with at least five years' service as such. **(Copy of notification/Rules dated 24.07.2014 is attached as Annexure-D)**
3. That the respondent department in the year 2020 appointed two persons on the post of SST (BPS-16) in Physics/Maths group through notification dated 13.05.2020 on initial quota without promoting any SCT/CT teacher by observing 40% promotion quota of SCT/CT to SST (BPS-16) in Physics/Maths group. Similarly, the respondent department in the year 2021 appointed another two persons on the post of SST (BPS-16) in Physics/Maths group through notification

dated 16.04.2021 on initial quota without promoting any SCT/CT teacher by observing 40% promotion quota of SCT/CT to SST (BPS-16) in Physics/Maths group. It is pertinent to mention here that one of the candidate namely Inayat Khan was appointed through initial quota in the appointment notification dated 13.05.2020 and adjusted at GHS Dour Mera, but GHS Dour Mera is far away from his home, therefore, he again applied to GHS Shagai near to his home through initial appointment in the year 2021 and was again appointed through initial quota in the appointment notification dated 16.04.2021 and adjusted him at GHS Shagai on 21.04.2021 due to which the post of SST (BPS-16) in Physics/Maths group became vacant at GHS Dour Mera on 22.04.2021 due to the appointment and adjustment Inayat Khan at GHS Shagai. (Copies of notification dated 13.05.2020, notification dated 16.04.2021 and notification 21.04.2021 are attached as Annexure-E,F&G)

4. That respondent No.1 through memo dated 29.07.2021 informed all the District Education Officer (Male) Khyber Pakhtunkhwa that the meeting of Departmental Promotion Committee has been scheduled to be held on 12.08.2021 for promotion of CT, DM, AT, TT, SST (B/C) and SST (P/M) BPS-16 against the vacant posts available under promotion quota at different Districts and told them to attend the subject meeting and to submit the subject promotion cases if fulfilling the academic and professional qualification and having the required length for promotion by 12.08.2021. The respondent No.2 in response of notification dated 29.07.2021 directed some teachers through memo dated 01.08.2021 in which the name of the appellant was also present, to furnish their quality personal file, service books and other relevant documents complete in all respect without adverse remarks to his office within 02 days for placing before the departmental promotion committee on which the appellant submitted his relevant documents, but in spite that the appellant was not promoted to the post of SST (BPS-16) in Physics/Maths group despite the availability of the vacant post of SST (BPS-16) in Physics/Maths group and eligibility of the appellant. (Copies of notification dated 29.07.2021 and memo dated 01.08.2021 are attached as Annexure-H&I)
5. That as the appellant was eligible for promotion to the post of SST (BPS-16) in Physics/Maths group and the post of SST (BPS-16) in Physics/Maths was vacant/available on 22.04.2021 due to the re-appointment of Inayat Khan, therefore, the appellant filed departmental appeal on 28.07.2022 to promote him on the post of SST (BPS-16) in Physics/Maths group w.e.from 22.04.2021 on which respondent No.2 through letter dated 06.02.2023 asked to justify seven number of SST (M/P) appointment under 25% initial recruitment quota w.e.f 2018 and persistently ignoring 75% quota of promotion as one only post of SST (M/P) has been filled by promotion during the same time span, however no action has taken

on his departmental appeal within the stipulated period of ninety days. **(Copies of departmental appeal and letter dated 06.02.2023 are attached as Annexure-J&K)**

6. That after statutory period of 90 days, the appellant service appeal No.1692/2022 in this Honorable to consider him for promotion the post of SST (BPS-16) in Physics/Maths Group with effect from 22.04.2021 as the post of SST (BPS-16) in Physics/Maths Group was available on 22.04.2021 under 40% promotion quota and the appellant was eligible but as there was no order either original or appellate original, therefore the counsel for the appellant could not press the appeal and said that he would advise the client to take proper legal steps for seeking redressal of his grievance and the service appeal of the appellant was disposed of on 22.02.2023. **(Copies of service appeal and order sheet dated 22.02.2023 are attached as Annexure-L&M)**
7. That the appellant then approached Honorable Peshawar High Court Abbottabad Bench for redressal of his grievance in writ petition No.296-A/2023. The case of the appellant was disposed of on 21.09.2023 with direction to respondents to consider the case of the appellant in the coming Departmental Promotion Committee (DPC) for the post of SST (BPS-16). **(Copies of memo of writ petition and order/judgment dated 21.09.2023 are attached as Annexure-N&O)**
8. That DPC was held in which the appellant was recommended for promotion and consequent upon the recommendation of DPC the appellant along with other official were promoted to the post of SST (BPS-16) on regular basis vide notification dated 08.12.2023 with immediate effect instead of due date i.e 22.04.2021 the date on which the post of SST (BPS-16) Physics/Maths was available in 40% promotion quota and was adjusted at GHS Bartooni. **(Copy of notification dated 08.12.2023 is attached as Annexure-P)**
9. That the post of SST (BPS-16) in Physics/Maths Group was available on 22.04.2021 under 40% promotion quota and the appellant was also eligible for promotion to the post of SST (BPS-16) in Physics/Maths Group on 22.04.2021 but he was promoted on 08.12.2023 with immediate effect, therefore, he filed departmental appeal on 26.12.2023 to promote him with effect from 22.04.2021 instead of 08.12.2023 by modifying his promotion notification dated 08.12.2023 to that extent with all back benefits, which was not responded within the statutory period of ninety days. **(Copy of departmental appeal is attached as Annexure-Q)**
10. That the appellant has no other remedy except to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

→ GROUND:

- A) That not taking action on the departmental appeal of the appellant within the statutory period and not antedating the promotion of the appellant to the post of SST (BPS-16) in Physics/Maths Group 08.12.2023 to 22.04.2021 the date on which the post of SST (BPS-16) in Physics/Maths Group is available for promotion under 40% promotion quota by modifying the notification dated 08.12.2023 to that extent to the extent of the appellant are against the law, facts, norms of justice, material on record and violation of Superior Courts judgments, therefore not tenable and notification dated 08.12.2023 is liable to be modified to antedated the promotion of the appellant w.e. from 22.04.2021, the date on which the post of SST (BPS-16) in Physics/Maths Group is available for promotion under 40% promotion quota.
- B) That the appellant was eligible for promotion to the post of SST (BPS-16) in Physics/Maths group and the post was also available on 22.04.2021 under 40% promotion quota, but despite that the appellant was promoted to post of SST (BPS-16) in Physics/Maths group with immediate effect instead of 22.04.2021 vide notification dated 08.12.2023, which is against the law and rules.
- C) That the respondent department has vacant post of SST (BPS-16) in Physics/Maths on 22.04.2021, but despite that the appellant was promoted to the post of SST (BPS-16) in Physics/Maths group with immediate effect instead of 22.04.2021 vide notification dated 08.12.2023.
- D) That the Honorable supreme of Pakistan has also held in its various judgments that promotion should be made from the date when the post is available for the official in his quota, but the appellant was promoted to the post of SST (BPS-16) in Physics/Maths group with immediate effect vide notification dated 08.12.2023 instead of 22.04.2021 i.e the date on which the post of SST (BPS-16) is available and such action of the respondents is clear violation of the superior courts judgments.
- E) That not promoting the appellant to the post of SST (BPS-16) in Physics/Maths group from due date i.e 22.04.2021 under 40% promotion quota of SCT/CT by modifying the notification dated 08.12.2023 will damage the service carrier of the appellant both in monitoring benefits as well as in further promotion chances for no fault on his part.
- F) That the appellant has not been treated in accordance with law and rules and has been deprived from his legal right of promotion to the post of SST (BPS-16) in Physics/Maths group from due date i.e

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22.04.2021, the date when the post was available and the appellant was eligible.

- G) That in District Lower Chitral 02 posts of SST (BPS-16) in Biology/Chemistry group were vacant in the respondent department in the year 2021 and the teacher namely Muhammad Nawaz Sharif, who was also appointed in the year of 2016 was promoted on one post of SST (BPS-16) in Biology/Chemistry group under 40% promotion quota of SCT/CT vide notification 29.10.2021, but the appellant was not treated like him in accordance with rules by promoting him to the post of SST (BPS-16) in Physics/Maths group w.e.f 22.04.2021 under 40% promotion quota of SCT/CT despite the eligibility and availability of one post of SST (BPS-16) in Physics/Maths group on 22.04.2021. (Copy of notification dated 29.10.2021 is attached as Annexure-R)
- H) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that on the acceptance of this appeal, the appellant may kindly be considered for antedation of his promotion to the post of SST (BPS-16) in Physics/Maths group with effect from 22.04.2021, the date when the post of SST (BPS-16) in physics/Maths group was available for promotion by modifying the notification dated 08.12.2023 to that extent to the extent of the appellant with all back and consequential benefits. Any other remedy, which this Honorable Tribunal deems fit and appropriate that, may also, be awarded in favour of appellant.

Jw
APPELLANT
Abdul Jalil

THROUGH:

Sh
(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT

& *Sh*
SHAKIR ULLAH TORANI
ADVOCATE

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2024

Abdul Jalil

VS

Education Department

AFFIDAVIT

I, Abdul Jalil, SST (Physics/Maths) BPS-16, GHS Bartooni, District Torghar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

Jl
DEPONENT

8

A

UNIVERSITY OF SARGODHA

Roll No: 23777

Serial No. 835

Registration No: 14-US-P-16709



PASS RESULT CARD

M.A. Composite 1st Annual Examination, 2015

Subject : Pakistan Studies

Name of the Candidate : Abdul Jalil
Father's Name : Abdul Ghafar
Institution / District : Peshawar

The candidate mentioned above is hereby informed that He / She has **PASSED** the M.A. Composite 1st Annual Examination, 2015 held in Aug-Sep, 2015, obtaining **511 / 1000** marks and has been placed in Second division.

Marks obtained by him / her in each paper are given below:-

Paper No	Title of Paper	Marks Obtained	Maximum Marks	Remarks
I	Muslim Nationalism in South Asia 1857-1947	43	100	
II	Research Methodology & Historiography	40	100	
III	Constitutional and Political Development in Pakistan 1947-2009	59	100	
IV	Pakistani Society and Culture	62	100	
V	Foreign Policy of Pakistan 1947-2009	42	100	
VI	Ancient Civilizations, Indus Valley & Gandhara	46	100	
VII	Political Parties in Pakistan	41	100	
VIII	Pakistan and the Current Affairs	68	100	
IX	Local Self Government in Pakistan	58	100	
XI	Military Role in Pakistan	52	100	
Total		511	1000	

Notes:

This result card is issued as a notice only, errors and omissions excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper Certificate / Degree which will be issued under the Regulations in due course.

Result Declared on February 01, 2016

[Signature]
Assistant Controller of Examinations

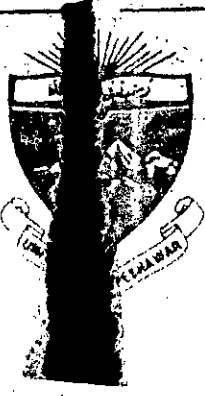
Prepared by Computer Cell

for Controller

Checked by [Signature]

Name : Abdul Jalil Roll No : 23777
Father's Name: Abdul Ghafar
Address: GARHI IKRAM ULLAH NASIR BAGH P/O REGI
PESHAWAR

9



University of Peshawar Pakistan

Detailed Marks Certificate

Master of Education (DE)

M.Ed

Annual Examination 2015

Distance Education



Name: ABDUL JALIL

Gender: Male

Roll No: 7499

Father's Name: ABDUL GHAFAR

Registration No: 2009-MP-1152

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Philosophy of Education	100	64	Sixty Four
Educational Psychology	100	72	Seventy-Two
Educational Planning & Management	100	60	Sixty Only
Curriculum Development	100	51	Fifty One
Research Methods	100	66	Sixty Six
Measurement & Evaluation	100	75	Seventy Five
Secondary Education in Pakistan	100	52	Fifty Two
Teacher Education in Pakistan	100	51	Fifty One
	800	491	Four Hundred and Ninety One

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken As a Whole

Examination held From 30-Aug-2015 to 05-Sep-2015

Result Declared on Tuesday, April 5, 2016

Issue Date 05-Apr-2016

11 00 am

Computerized by RTC

District Peshawar

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



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) DISTRICT TOR GHAR

10

B

NOTIFICATION

Consequent upon the recommendations of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Certified Teacher (CT General) School based in BPS-15 (Rs.10985-905-38135/- @ 10985, fixed plus usual allowances as admissible under the rules on adhoc basis and school basis initially for a period of one year under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge :-

S.NO	NAME OF TEACHER	FATHER NAME	SCORE	NAME OF SCHOOL WHERE APPOINTED	REMARKS
1	Kifayat Ullah	Muhammad Tahir	90.58	GMS Kand Dour Mera	Against V/P
2	Nusrat Shah	Iqbal Shah	92.37	GMS Shadag	--do--
3	Mujeeb Ur Rahman	Sultan Said	99.76	GMS Shagai	--do--
4	Shabbir Ahmed	Ikhtiar Malook	78.13	GMS Shingaldar	--do--
5	Abdul Jalil	Abdul Ghaffar	97.0	GMS Judba	--do--
6	Haleem Zada	Shereen	93.63	GMS Judba	--do--
7	Shakir Ullah	Ali Muhammad	96.16	GMS Shatal	--do--
8	Bakhti Zar Said	Nawab Said	112.19	GMS Cheer	--do--
9	Sharifur Rahman	Yaqub Khan	95.07	GMS Kotlay	--do--
10	Sham Shair	Asim Khan	94.13	GMS Kotlay	--do--
11	Safi Ullah	Aadur Rauf	91.98	GMS Kand Bala	--do--
12	Meraj Mehmood	Wazir Ur Rehman	106.32	GMS Kotkay	--do--
13	Syed Alam Khan	Syed Munawar Alam Khan	105.82	GMS Darow	--do--

TERMS & CONDITIONS:

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & adhoc basis initially for a period of one year.
4. They should not be handed over charge if their age is above 35 years or below 18 years.
5. Their Appointments are subject to the condition that their **CERTIFICATE/DOCUMENTS AND DOMICILES** be verified from the concerned authorities by the District Education Officer (M), anyone who found producing fake documents will be dismissed from service and the case will further be reported to the law enforcing agencies for action under the relevant law.
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government treasury.
7. Their Pay will not be activated until and unless pay release order is not issued by the competent authority after verification of their documents by the District Education Officer.
8. They should join their post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.

Head Master
GMS Seri K...
H/Z Torgh...

- (11)
9. They should produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
 10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
 11. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
 12. Their appointment is made on School based, they will have to serve at the place of posting, and their services are not transferable to any other station.
 13. The competent Authority reserve the right to rectify the errors and omissions, if any noted/observed at any stage in the instant order issued erroneously.
 14. Before handing over charge their document should be checked by the concerned Head of institutions, if they don't possessed the prescribed qualification of the post they should not be handed over the charge.

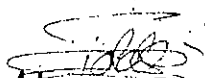
--SD--
Abdullah
District Education Officer (M)
E&SE Tor Ghar

Endst: No. 919-28/Dated Tor Ghar 09th April 2016.

Copy forwarded for information and necessary action to the: -

1. Secretary to Government Khyber Pakhtunkhwa E&SE Department Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. PS to Minister E&SE Department Khyber Pakhtunkhwa Peshawar.
4. Deputy Commissioner District Tor Ghar.
5. District Accounts Officer Tor Ghar at Mansehra.
6. District Monitoring Officer (IMU) Tor Ghar.
7. District Education Management Information System (DEMIS) Local Office.
8. Head Masters GMS Concerned.
9. Officials Concerned.
10. Office File.


District Education Officer (M)
E&SE Tor Ghar


Head Master
GMS Seri Kohani
H/Z Torghar



12

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT TOR GHAR**

Email: torgharemiwa@gmail.com

NOTIFICATION

In pursuance of the Section -3 of the Khyber Pakhtunkhwa employees of Elementary & Secondary Education Department (Appointment and Regularization of Service Act: 2017 read with Section -1 Sub-section (2) of the act and Elementary and Secondary Education Department Khyber Pakhtunkhwa Notification No. SO(S/F) E&SED/3-2/2018/SITT/Contract, Dated 16.02.2018. Service of the following Teacher (GT BPS-15) appointed on Adhoc basis on Contract, are hereby regularized in BPS-15 on the Same post in Teaching Cadre on the terms and condition given below with effect from the date of his appointment on the CT post.

S.No	Roll No	Name	Address	Total Marks (out of 200)	School	Appointment order No. & Dated
1	302700614	Abdul J...	Darbani Aka Zai Tor Ghar	97.0	GMS Judba	No.919-28 Dated 09.04.2016

TERMS & CONDITIONS.

1. His service will be governed by the Khyber Pakhtunkhwa Civil Servant Act: 1973 Khyber Pakhtun (Appointment, Deputation, Posting and Transfer of Teacher, Lecturers, Instructors and Doctors) Regularity Act: 2011 & such rules & regulations as may be issued from time to time by government
2. His pay will be released subject to verification of academic documents testimonials from the concerned Boards/ University by the District Education Officer Male Tor Ghar, anyone who found documents will be dismissed from service and the case will further be reported to the law enforcement agencies for action under the relevant law
3. His service shall be considered regular and he will be eligible for pension/deduction of GP Fund terms of Khyber Pakhtunkhwa Civil Service Act, 1973 as amended in 2013.
4. His service is liable to termination on one month notice from either side. In case of resignation with notice, his one month pay/allowances shall be forfeited to the government Treasury
5. He possess the requisite qualification and experience required for a regular post.
6. He has not resigned from the services or terminated from services on account of misconduct, inefficiency or any other ground before the commencement of the Act: of 1973.
7. His regularization will not affect the promotion quota of existing holders of posts in cadre of CT
8. He will rank to all other employees belonging to the cadre who are in service on regular basis at commencement of this act: and will also rank junior to such other persons if any, who in pursuance of the recommendations of the Khyber Pakhtunkhwa public service commission made before the commencement of this act; or to be appointed to the cadre irrespective of his actual date of appointment.
9. The seniority shall be determined on the basis of his continuous service in cadre provided that in the date of continuous service in the case of two or more employees is the same, the employee of the age shall be rank senior to the younger one
10. The competent authority reserves the right to rectify the errors and omission, if any noted/observed at any stage in instant order issued erroneously.

Order No. 244-50 / Dated 27/15 / 2019.

Copy for information to the.

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Tor Ghar
3. District Monitoring Officer (IMU) Tor Ghar.
4. District Account Officer Tor Ghar
5. Head Master GHS/GMS Concerned
6. Teacher Concerned.
7. ...

—Sd—
District Education Officer (M)
E&SE Tor Ghar

District Education Officer (M)
E&SE Tor Ghar

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years F. Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

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	<p>IA: Director Physical Education (BPS-17)</p>	<p>At least second class Master's Degree in Physical Education from a recognized University.</p>	<p>22-35 years</p>	<p>recruitment, and (b) fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and</p> <p>(b) fifty percent by initial recruitment; and</p>
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(ii) against Serial No. 1B, as so numbered, for the existing entries, the following shall be substituted, in respective columns namely:

1	2	3	4	5
1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3;</p>

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				<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) <u>four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3;</u></p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) <u>four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3;</u></p>
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all length in ml completed. New on active change basis.

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Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(e) three per cent from amongst the Senior Qaris, (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:-

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:-

Provided that if no suitable candidate is available from amongst

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			<p>Primary School Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</p> <p>(ii) twenty Five percent by initial recruitment.</p> <p>Note:</p> <p>i. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>ii. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately.</p>
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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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

(ZAMIN KHAN MONANI)
SECTION OFFICER (PRIMARY)

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SSTs (Male) Tor Ghar

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the advertisement bearing No. INF(P)2281/19 and recommendations of the Departmental Selection Committee, the following candidates are appointed to the post of SST (G), SST (B/C) and SST (P/M) Male in BPS-16 (Rs.18910-1520-64510) @ Rs.18910/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions given below with immediate effect.

ITEM NO.1 APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

Sr	Roll No	Name	D/o Birth	CNIC#	Permanent Address	Acad: Marks (100)	NTS Marks (100)	Total Marks (200)	Remarks/Place of Duty
1	201900635	Muhammad Ismaeel S/O Hazrat Islam	1.3.1988	13504-3104781-5	Karor Mada Khel P.O. Box Karor Kandar Tehsil & District Tor Ghar	67.64	52	119.64	Appointed and adjusted at GMS Shingaldar
2	201900880	Muhammad Qasim Khan S/O Muhammad Aslam Khan	7.3.1995	13504-7846537-9	PO Judba Salri Kohani Tor Ghar	60.15	52	112.15	Appointed and adjusted at GHS Shagai

ITEM NO.2 APPOINTMENT OF SECONDARY SCHOOL TEACHERS (B/C) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

Sr	Roll No	Name	D/o Birth	CNIC#	Permanent Address	Acad: Marks (100)	NTS Marks (100)	Total Marks (200)	Remarks/Place of Duty
1	221800010	Muhammad Islam S/O Abdul Latif	13.4.1996	13504-7870886-1	New Ghari Hassan Zai P.O Box Oghai New Kalay Tor Ghar	60.14	60	120.14	Appointed and adjusted at GHS Gawandla
2	121800113	Muhammad Ilyas S/O Muhammad Zar	18.12.1996	13504-5803582-1	Chichian Dherai Tehsil Judba Tor Ghar	43.34	61	104.34	Appointed and adjusted at GHS Dour Mera

ITEM NO.3 APPOINTMENT OF SECONDARY SCHOOL TEACHERS (P/M) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

Sr	Roll No	Name	D/o Birth	CNIC#	Permanent Address	Acad: Marks (100)	NTS Marks (100)	Total Marks (200)	Remarks/Place of Duty
1	222100016	Inyat Khan S/O Jhanzaib	9.12.1996	35202-0739565-3	Kandar, Basekhel, Tehsil Judba District Tor Ghar	47.71	66	113.71	Appointed and adjusted at GHS Dour Mera

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Sum of
NTS

SSTs (Male) Tor Ghar

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2	202100381	Jamil Khan S/O Muhammad Aslam Khan	6.8.1989	13504- 7940587-9	PO Khas Sarai Kohani Tor Ghar	58.54	54	112.54	Appointed and adjusted at GHSS New Killay
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Terms and Conditions:-

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year with immediate effect.
4. They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
5. If any meritorious candidate is deprived of appointment by this order, and the competent authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
6. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO (concerned), anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
7. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
8. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) to the effect that their certificates are verified and found correct and genuine.
9. They should join their post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days, their appointment will expire automatically and no subsequent appeal shall be entertained.
10. Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
11. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period.
13. The appointment is made on school based. They will have to serve at the place of posting and their services are not transferable to any other station.
14. Before handing over charge, once again their documents may be checked by the Headmaster/Principal (Concerned) and if they do not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post.
15. The appointees shall take nine (09) months mandatory training at RITE Or PITE.

(Hafiz Dr. Muhammad Ibrahim)
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 1499-1505 / File No.5/A-14/SST/Adhoc Appt: (BPS-16) Dated Peshawar the 13/5/2020
Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Tor Ghar
3. District Accounts Officer Tor Ghar with the request to release their pay on production of Duty Certificate duly countersigned by DEO concerned
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

Deputy Director
Elementary & Secondary Education
Khyber Pakhtunkhwa



Notification

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

SSTs (Male) Tor Ghar

Consequent upon the advertisement bearing No. INF(P)4019/20, and the recommendations of the Departmental Selection Committee, the following candidates are appointed to the post of SST (G), SST (B/C) and SST (P/M) Male in BPS-16 (Rs.18910-1520-64510) @ Rs.18910/- fixed plus usual allowances as admissible under the rules on adhoc/contract basis under the existing policy of the Provincial Government, in Teaching Cadre, on the terms and conditions as given below with immediate effect:

ITEM NO.1

APPOINTMENT OF SECONDARY SCHOOL TEACHERS (G) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

S.No	Roll No	Name	Father Name	D.O.B	CNIC	Acad Marks	NTS Marks	Total Score	School/Place of Duty
1	16400043	Syed Muhammad Shah	Khan Syed	29.03.1998	13601-0505543-9	58.22	63	121.22	Services are placed at the disposal of DEO(M) Tor Ghar

ITEM NO.2

APPOINTMENT OF SECONDARY SCHOOL TEACHERS (B/C) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

S.No	Roll No	Name	Father Name	D.O.B	CNIC	Acad Marks	NTS Marks	Total Score	School/Place of Duty
1	12100005	Shoaib Zamin	Zamin Shah	25.08.1995	13504-6860510-7	61.02	73	134.02	Services are placed at the disposal of DEO(M) Tor Ghar
2	12100044	Inam Ullah Khan	Sabbar Khan	12.12.1995	13504-9170713-5	56.60	71	127.60	Services are placed at the disposal of DEO(M) Tor Ghar

ITEM NO.3

APPOINTMENT OF SECONDARY SCHOOL TEACHERS (P/M) MALE (BPS-16) ON ADHOC BASIS UNDER 25% OPEN QUOTA

S.No	Roll No	Name	Father Name	D.O.B	CNIC	Acad Marks	NTS Marks	Total Score	School/Place of Duty
1	16200004	Inayat Khan	Jhan Zaib	09.12.1996	35202-0739565-3	61.08	64	125.08	Services are placed at the disposal of DEO(M) Tor Ghar
2	11200829	Ameer Hamza	Sarwar Gul	02.07.1995	13502-2349744-7	64.21	54	118.21	Services are placed at the disposal of DEO(M) Tor Ghar

Terms and Conditions:-

1. The DEO is directed to adjust/post the appointees against the schools/posts already advertized on the web-site of NTS.
2. No TA/DA is allowed.
3. Charge reports should be submitted to all concerned in duplicate.
4. Appointment is purely on temporary & contract basis initially for one year with immediate effect.
5. They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to the Competent Authority.
6. If any meritorious candidate is deprived of appointment by this order, and the Competent Authority accepts his appeal, the appointment order of the low merit candidate will be withdrawn, and the adjustment order will be reviewed according to the merit.
7. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO (concerned), anyone found producing bogus certificate will be reported to the law enforcing agencies for further action, and his appointment order shall be denotified from the date of its issuance.
8. Their services are liable to termination on one month's notice from either side. In case of leaving the department without notice their one month pay/allowances shall be forfeited to the Government.
9. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) to the effect that their certificates are verified and found correct and genuine.
10. They should join their post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days, their appointment will expire automatically and no subsequent appeal shall be entertained.
11. Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.

SSTs (Male) Tor Ghar

12. Their services shall be terminated at any time, in case his performance is found unsatisfactory during the contract period, or will be extended for another year if found satisfactory.
13. The appointment is made on school based. They will have to serve at the place of posting, and their services are not transferable to any other station.
14. Before handing over charge, once again their documents may be checked by the Headmaster/Principal (Concerned) and if they have not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post, and the case may be reported to the Directorate, E&SE, for withdrawal of order.
15. The appointees shall take nine (09) months mandatory training at RITE Or PITE.

(Hafiz Dr. Muhammad Ibrahim)

Director

**Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst: No 4502-08 /File No.5/A-14/SST/Adhoc/Apptt: (BPS-16) Dated Peshawar the 16/04/2021
Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Torghar
3. District Accounts Officer Torghar
4. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
6. Officials Concerned
7. M/File

**Deputy Director
Elementary & Secondary Education
Khyber Pakhtunkhwa**

23

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT TOR GHAR**



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G

The Director E&SE Khyber Pakhtunkhwa Peshawar Notification No. 4503-GE/16 No. 514 (BPS-16) Dated Peshawar 10-04/2021. The following candidates are appointed to the posts of [unclear] in BPS-16 (Rs 18910-1920-94510) plus usual allowances as admissible under the rules and regulations in force under the existing policy of the Provincial Government in teaching cadre and further adjusted as per the revised instructions, as mentioned against each on the terms and conditions as given below with effect from [unclear].

Sl. No.	NAME OF TEACHER	TOTAL SCORE	POSTED AT	REMARKS
1	[unclear] S/O [unclear]	125.08	GHS Shaga Tor Ghar	Adjusted against the vacant post of SST Physics Math BPS-16
2	[unclear] S/O [unclear]	118.21	GHS Kotkay Hassan Zai Tor Ghar	—do—

TERMS & CONDITIONS:

- NO TADA etc. is allowed
- Charge reports should be submitted to all concerned in duplicate
- Their appointments are purely on temporary and contract basis initially for a period of one year with immediate effect.
- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- Their appointments are subject to the conditions that their CERTIFICATES/DOCUMENTS be verified from the concerned authorities by the Deputy District Education Officer (M) Tor Ghar, if found producing fake documents will be dismissed from service and the case will further be reported to the law enforcing agencies for action under the relevant law.
- Their services shall be terminated at any time, in case of their performance is found unsatisfactory during probationary period, or will be extended for another year if found satisfactory.
- Their pay will not be activated until and unless pay release order is not issued by the competent authority after verification of their documents by the Deputy District Education Officer (Male) Tor Ghar.
- The competent Authority reserve the right to rectify the errors and omissions, if any noted/observed at any stage in the instant order issued erroneously
- Before handing over charge their documents should be checked by the concerned Head of institution, if they don't possess the prescribed qualification of the post they should not be handed over the charge.
- They should join their post within 15 days of the issuance of this notification. In case of failure to join the post within the 15 days, their appointment will automatically and no subsequent appeal shall be entertained.
- The appointment is made on school based. They will have to serve at the place of posting, and their services are not transferable to any other station
- The appointees shall take nine (09) months mandatory training at RITE or PITE.

-SD-

District Education Officer (M)
E&SE Tor Ghar

Sl. No. 2116-30 dated: 21/04/2021.

One of the above are forwarded for information and necessary action to the:-

- Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- Deputy Commissioner Tor Ghar.
- District Accounts Officer, Tor Ghar at Mansehra.
- District Monitoring Officer (EMA) Tor Ghar.
- Head Master of GHS Concerned.
- Teachers Concerned.
- Master File.

District Education Officer (M)
 E&SE Tor Ghar
 21/04/2021

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24

BETTER COPY

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT TOR GHAR

Email: torghar----@gmail.com

NOTIFICATION

In pursuance to the Director E&SE Khyber Pakhtunkhwa Peshawar Notification No. 4502-08/File No. S/A: 14/SST/Adhop/Apptt (BPS-16) Dated Peshawar 16/04/2021. The following candidates are appointed to the posts of SSTs Physics Math (Male) in BPS-16 (Rs 18910-1520-64510) plus usual allowances as admissible under the rules on adhoc/contract basis under the existing policy of the Provincial Government in teaching cadre and further adjusted against the vacant posts/stations. As mentioned against each on the terms and conditions as given below with immediate effect

S. #	NAME OF TEACHER	TOTAL SCORE	POSTED AT	REMARKS
01	INayat Khan S/O Jhan Zeb	125 08	GHS Shagai Tor Ghar	Adjusted again the vacant post of SST Physics Math BPS-16
02	Ameer Hamza S/O Sarwar Gui	118 21	GHS Kocay Hassan Zai Tor Ghar	-do-

Terms & CONDITIONS:

1. NO TAJDA etc is allowed
2. Charge reports should be submitted to at concerned in duplicate.
3. Their appointments are purely on temporary and contract basis initially, for a period of one year with immediate effect
4. They will be governed by such rules and regulations as may be issued from time to time by the Government.
5. Their appointments are subject to the conditions that their CERTIFICATES/DOCUMENTS be verified from the concerned authorities by the Deputy District Education Officer (M) Tor Ghar. If found producing fake documents will be dismissed from service and the case will further be reported to the law enforcing agencies for action under the relevant law
6. Their services shall be terminated at any time in case of their performance is found unsatisfactory during probationary period or will be extended for another year if found satisfactory
7. Their pay will not be activated until and unless pay release order is not issued by the competent authority after verification of their documents by the Deputy District Education Officer (Male) Tor Ghar
8. The competent Authority reserve the right to rectify the errors and omissions. If any noted, observed at any stage in the instant order issued erroneously
9. Before handing over charge their documents should be checked by the concerned Head of institution if they don't possess the prescribed qualification of the post they should not be handed over the charge
10. They should join their post within 15 days of the issuance of this notification in case of failure to join the post within the 15 days, their appointment will automatically and no subsequent appeal shall be entertained
11. The appointment is made on school based. They will have to serve at the place of posting one their services are not transferable to any other station
12. The appointment shall take nine (09) months mandatory training at RITE or PITE

-SD-

District Education Officer (M)
E&SE Tor Ghar

Endst: No 2126-32 dated: 21/04/2021.

Copies of the above are forwarded for information and necessary action to the:-

1. Director E&SE Department, Khyber Pakhtunkhwa, Peshawar
2. Deputy Commissioner Tor Ghar
3. District Accounts Officer, Tor Ghar at Mansehra
4. District Mentoring Officer (EMA) Tor Ghar
5. Head Master of GHS Concerned
6. Teachers Concerned
7. Master File

District Education Officer (M)
E&SE Tor Ghar



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

No. 4174-800/490/Vol-IV/SST(M) Complaints Karak
Dated 29/07/2021

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To,

All District Education Officers (M),
Khyber Pakhtunkhwa.

Subject:- **MEETING OF DEPARTMENTAL PROMOTION COMMITTEE FOR PROMOTION TO SENIOR TEACHERS (BPS-16) AND SST (GL SST (B/C) AND SST (P/M) BPS-16**

Memo:-

I am directed to refer to the subject cited above and to say that the meeting of Departmental Promotion Committee has been scheduled to be held on 12-08-2021 sharply at 10:00 am this Directorate, for Promotion of CT, DM, AT, TT and PET to SCT, SDM, SAT, STT and SPET, and SCT, SDM, SAT, STT and S.O. to SST (G), SST (B/C) and SST (P/M) BPS-16 respectively, against the vacant posts available under the Promotion Quota at different districts.

I am further directed to ask you to attend the subject meeting as per the schedule, instructions and certificate attached herewith for your kind perusal, and to submit the subject promotion cases, if fulfilling the academic and professional qualifications and having the required service length for promotion, by 12.08.2021 as per the date of Departmental Promotion Committee meeting, in quality personal files of each teacher, having the following items, along with updated seniority list and working papers please.

1. CNIC
2. Bio-Data
3. Synopsis
4. ACRs for the Last Five Years
5. Last Three Years' Results
6. All Academic & Professional Documents
7. Domiciles
8. Last Pay Rolls
9. First Appointment Order
10. Promotion Orders (if any)
11. Non-Involvement Certificate
12. Service Certificate
13. Original Service Books (Updated and complete in all sorts of entries like academic and professional qualifications with documentary proofs of NOCs/Ex-Post Facto Sanctions, and service verification)
14. Certificate that the seniority list of each cadre updated and no apples is pending

Note:- All documents must be attested by Reporting Officer and Countersigning Officer. General guidelines and specimen of working papers is attached for ready reference.

Deputy Director (Estab:)
Khyber Pakhtunkhwa
Peshawar

Encls: No. _____

Copy forwarded to the:-

1. Additional Director Establishment (Male/Female) EASE Peshawar.
2. Additional Director Establishment, Newly Merged Districts.
3. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa
4. Master File.

Deputy Director (Estab:)
Khyber Pakhtunkhwa
Peshawar

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT TOR GHAR

DEPARTMENTAL PROMOTION COMMITTEE (DPC) FOR PROMOTION TO SENIOR TEACHER (BPS-16) SST (G) SST (B/C) AND SST (M/P) BPS-16

In pursuance to the Notification No 4174-200/490/Vol-IV/SST(M) dated 29.07.2021 issued by Directorate of ESSE Khyber Pakhtunkhwa Peshwar regarding promotion of Senior Teacher BPS-16 and Provincial level, the following teachers are hereby directed to furnish their quality personal files, service books and other relevant documents complete in all respect without any adverse remarks to this office within 02 days for further course of action to avoid any inconvenience for placing before the departmental promotion committee please

S.No	Cadre	Name of teacher	Father Name	School	Eligibility Criteria
1	SCT/CT to SST (G)	1. M. Siraj	Abdur Rauf	GHSS Manjakot	BA-B.Ed
		2. Izzat Ullah	Asmat Ullah		
		3. Sami Ullah	Asmat Ullah		
		4. M. Iqbal	Rafi Ullah		
2	SCT/CT to (M/P) & PSHT/SPST/PST to SST (M/P)	1. Abdul Jalil	Shereen	GMS Seri Kohani	BSc-B.Ed
		2. M. Aqeel	Minhaj Ul Haq		
3	CT to SCT	1. Umar Shad	Sher Shad	GPS Boray	BA-CT
		2. Gul Pasand	M. Ameen Khan		
		3. Khyal Muhammad	Sher Muhammad		
		4. Hadi Noor Shah	Manawar Shah		
		5. Zahid Hussain	Ghulam Din		
		6. M. Darwaish	Anwar Ul Haq		
	AT to SAT	1. Firdos Jamal	M. Izhar	GMS Cheer	BA-Shahadat Ul Alimia or MA Arabic
		2. Fazal Rabi	Hazrat Jan		
	TT to STT	1. Hazrat Momin	Said Ghulam	GMS Chund	BA-Shahadat Ul Alimia or MA Islamat
		2. Noor Alam Shah	Fazal Shah		
	DM to SDM	1. M. Asif	M. Yousaf	GMS Kand Bala	BA-DM
		2. Usman Ullah	Zahir Ullah		
		3. Abdul Qayum	Malak Aman		
		4. Shoaib Asim	M. Saleem Khan		
		5. Sher Sultan	M. Akbar		

District Education Officer (M)
ESSE TOR GHAR

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

No. 6938 /F.No. 215/SST (M)/Promotion District Toghhar

Dated Peshawar the 06/02 /2023

Phone: 091-9225344

Email: estabshmentmale1@gmail.com

To

*The District Education Officer,
(Male) Toghhar.*

Subject: - DEPARTMENTAL APPEAL REGARDING PROMOTION FROM CT TO
SST M/P

Memo:

I am directed to refer to letter No. 7293 dated 19-01-2023 on the subject cited above and to ask you to justify seven number of SST (M/P) appointment under 25% initial recruitment quota w.e.f 2018 and persistently ignoring 75% Quota for promotion as only one post of SST (M/P) has been filled by promotion during the same time span.

[Signature]
Assistant Director (Estab-MI)
Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No. _____

Copy of the above is to:-

1. PS to Secretary E&S E Department.
2. PA to Director (E&SE) Local Directorate.
3. Master File.

[Signature]
Assistant Director (Estab-MI)
Elementary & Secondary Education
Khyber Pakhtunkhwa

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR



SERVICE APPEAL NO. 1692 /2022

Abdul Jalil, CT (Physics/Maths) BPS-15,
GMS Sari Kohani, District Torghar.

19/10

14-11-2022

(APPELLANT)

VERSUS

1. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. The Director Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) Torghar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS OF NOT PROMOTING THE APPELLANT ON THE POST OF SST (BS-16) IN PHYSICS/MATHS GROUP UNDER 40% PROMOTION QUOTA OF SCT/CT DESPITE THE AVAILABILITY OF POST IN HIS QUOTA AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF SST (BPS-16) IN PHYSICS/MATHS GROUP W.E.F 22.04.2021 AS THE POST OF SST (BPS-16) IN

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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PHYSICS/MATHS GROUP WAS VACANT/AVAILABLE
ON 22.04.2021 UNDER 40% PROMOTION QUOTA.

OR

CONSIDER THE APPELLANT FOR PROMOTION ON
THE AVAILABLE VACANT 02 POSTS OF SST (BPS-16) IN
PHYSICS/MATHS GROUP IN RESPONDENT
DEPARTMENT UNDER 40% PROMOTION QUOTA of
SCT/CT. ANY OTHER REMEDY, WHICH THIS AUGUST
TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY
ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWTH:
FACTS:

1. That the appellant is well qualified having MA, MEd degree and was appointed as CT teacher in Physics/Maths group in the respondent department on 09.04.2016 and his service was regularized from the date of his appointment vide notification dated 29.05.2019. The appellant since his appointed is performing his duty with devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performing. (Copy of documents and appointment notification and regularization notification are attached as Annexure-A,B&C)
2. That the department issued a notification/Rules on 24.07.2014, wherein the post of SST (BPS-16) can be filled through 75% promotion quota on the basis of seniority-cum-fitness from the concerned District and 75% promotion quota was further bifurcate in the manner that 40% quota from amongst the Senior Certified Teacher (BPS-16) with at least five years service as Senior Certified Teacher and Certified Teacher having qualification of second class Bachelor degree from recognized University from the groups with two subjects with Chemistry, Botany or Zoology or Physics, Maths "A" "B" or Statistics or Humanities or other equivalent group at degree level with English as Compulsory subject and Bachelor of Education or Master of Education provided that if no suitable candidate is available from amongst Senior Certified Teacher for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teacher, with at least five years service as such. (Copy of notification/Rules dated 24.07.2014 is attached as Annexure-D)
3. That the respondent department in the year 2020, appointed two persons on the post of SST (BPS-16) in Physics/Maths group through notification dated 13.05.2020 on initial quota without promoting any

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal

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SCT/CT teacher by observing 40% promotion quota of SCT/CT to SST (BPS-16) in Physics/Maths group. Similarly, the respondent department in the year 2021 appointed two persons on the post of SST (BPS-16) in Physics/Maths group through notification dated 16.04.2021 on initial quota without promoting any SCT/CT teacher by observing 40% promotion quota of SCT/CT to SST (BPS-16) in Physics/Maths group. It is pertinent to mention here that one of the candidate namely Inayat Khan was appointed through initial quota in the appointment notification dated 13.05.2020 and adjusted at GHS Dour Mera, but GHS Dour Mera is far away from his home, therefore, he again applied to GHS Shagai near to his home through initial appointment in the year 2021 and was again appointed through initial quota in the appointment notification dated 16.04.2021 and adjusted him at GHS Shagai on 21.04.2021 due to which the post of SST (BPS-16) in Physics/Maths group became vacant at GHS Dour Mera on 22.04.2021 and teacher namely Abdullah Khan was transferred from GHSS Manjakot to Dour Mera on 05.07.2021 and the post of SST (BPS-16) in Physics/Maths group became vacant on 22.04.2021 due to the appointment and adjustment Inayat Khan at GHS Shagai. (Copies of notification dated 13.05.2020, notification dated 16.04.2021 and notification 21.04.2021 are attached as Annexure-E,F&G)

4. That respondent No.2 through memo dated 29.07.2021 informed all the District Education Officer (Male) Khyber Pakhtunkhwa that the meeting of Departmental Promotion Committee has been scheduled to be held on 12.08.2021 for promotion of CT, DM, AT, TT, SST (B/C) and SST (P/M) BPS-16 against the vacant posts available under promotion quota at different Districts and told them to attend the subject meeting and to submit the subject promotion cases if fulfilling the academic and professional qualification and having the required length for promotion by 12.08.2021. The respondent No.3 in response of notification dated 29.07.2021 directed some teachers through memo dated 01.08.2021 in which the name of the appellant was also present, to furnish their quality personal file, service books and other relevant documents complete in all respect without adverse remarks to his office within 02 days for placing before the departmental promotion committee on which the appellant submitted his relevant documents, but in spite that the appellant was not promoted to the post of SST (BPS-16) in Physics/Maths group despite the availability of the vacant post of SST (BPS-16) in Physics/Maths group and eligibility of the appellant. (Copies of notification dated 29.07.2021 and memo dated 01.08.2021 are attached as Annexure-H&I)
5. That now the respondent department have 02 available vacant posts of SST (BPS-16) in Physics/Maths group which became vacant at GHS Manja Kot from the re-appointment of Inayat Khan at GHS Shagai in the year 2021 and later on transfer of Abdullah Khan from

TESTED
KAMINER
Khyber Pakhtunkhwa
Service Tribunal

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GHSS Manjakot to GHS Dour Mera and from upgradation of GMS Chund Mada Khel to GHS Chund Mada Khel through memo dated 12.09.2022. (Copies of vacant post and upgradation memo dated 12.09.2022 are attached as Annexure- J&K)

6. That as the appellant was entitle for promotion to the post of SST (BPS-16) in Physics/Maths group and the post of SST (BPS-16) in Physics/Maths was vacant/available on 22.04.2021 due to the re-appointment of Inayat Khan and now 2 posts are vacant/available in SST (BPS-16) Physics/Maths group in the respondent department, therefore, the appellant filed departmental appeal on 28.07.2022 to promote him on the post of SST (BPS-16) in Physics/Maths group w.e.from 22.04.2021 or any available vacant post of SST (BPS-16) in Physics/Maths group, which was not respondent within the statutory period of ninety days. (Copy of departmental appeal is attached as Annexure-L)
7. That the appellant has no other remedy except to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUNDS:

- A) That not taking action on the departmental appeal of the appellant and not promoting the appellant on the post SST (BPS-16) in Physics/Maths group w.e.f 22.04.2021 under 40% promotion quota of SCT/CT despite the availability of post on 22.04.2021 and eligibility of the appellant or not promoting the appellant to the post SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT/CT despite the availability of 02 vacant posts and eligibility of the appellant are against the law, rules, norms of justice and material on record, therefore, not tenable.
- B) That the appellant was eligible for promotion to the post of SST (BPS-16) in Physics/Maths group and the post was also available on 22.04.2021, but despite that the appellant was not promoted on the available post of SST (BPS-16) in Physics/Maths group and now the respondent department have 2 vacant posts of SST (BPS-16) in Physics/Maths and not promoting the appellant on available vacant posts of SST (BPS-16) in Physics/Maths group is against the law and rules.
- C) That the post of the SST (BPS-16) in Physics/Maths group was vacant on 22.04.2021 due to the re-appointment of Inayat Khan and the respondent also directed the appellant to submit his documents for promotion to the post of SST (BPS-16) in Physics/Maths group in the year 2021, but despite that the appellant was not promoted to the post

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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of SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT/CT, which is against the norms of justice and fair play.

- D) That in District Lower Chitral 02 posts of SST (BPS-16) in Biology/Chemistry group were vacant in the respondent department in the year 2021 and the teacher namely Muhammad Nawaz Sharif, who was also appointed in the year of 2016 was promoted on one post of SST (BPS-16) in Biology/Chemistry group under 40% promotion quota of SCT/CT vide notification 29.10.2021, but the appellant was not treated like him in accordance with rules by promoting him to the post of SST (BPS-16) in Physics/Maths group w.e.f 22.04.2021 under 40% promotion quota of SCT/CT despite the eligibility and availability of one post of SST (BPS-16) in Physics/Maths group on 22.04.2021. (Copy of notification dated 29.10.2021 is attached as Annexure-M)
- E) That not promoting the appellant on the post of SST (BPS-16) in Physics/Maths group w.e.f 22.04.2021 or not promoting the appellant on the available 02 vacant posts of SST (BPS-16) in Physics/Maths group shows arbitrariness on the part of the respondents.
- F) That 2 posts of SST in Physics/Maths group are available in the respondent department and it is the legal right of the appellant to be promoted on the post of SST (BPS-16) in Physics/Maths group on 40% promotion quota of SCT/CT on any available post being eligible.
- G) That 40% promotion quota of SCT/CT of the department is still in filed and the appellant being eligible is entitle for promotion to the post of SST (BPS-16) on the basis of 40% promotion quota of SCT/CT.
- H) That depriving the appellant from his legal right of promotion to the post of SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT/CT by the respondent will damage the service carrier of the appellant both in monitoring benefits as well as in further promotion chances.
- I) That the appellant has not been treated in accordance with law and rules and has been deprived from his legal right of promotion to the post of SST (BPS-16) in Physics/Maths group under 40% promotion quota of SCT/CT.
- J) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Abdul Jalil
APPELLANT
Abdul Jalil

THROUGH:

Taimur Ali Khan
TAIMUR ALI KHAN
(ADVOCATE HIGH COURT)
PESHAWAR

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

CLERK
COURT

15.12.2022

A. No. 1692/2022
Abdul Jaleel vs Govt.

Lawyers are on strike. To come for preliminary

hearing on 22.02.2023 before the S.B at Camp Court

Abbottabad.

SCANNED
KPST
Peshawar

(Salah-Ud-Din)

Member (J)

Camp Court Abbottabad

22nd Feb, 2023



1. Mr. Hamayoon Khan, Advocate has filed Wakalatnama on behalf of the appellant.

2. Learned counsel for the appellant has very fairly and frankly submitted that there was no order either original or appellate in black and white enabling the appellant to approach this Tribunal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, therefore, he would not press this appeal and says that he would advise the client to take proper legal steps for seeking redressal of his grievances. Disposed of accordingly. Consign.

3. Pronounced in open court in Abbottabad and given under my hand and seal of the Tribunal this 22nd day of February, 2023.

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(Kalim Arshad Khan)
Chairman

Camp Court Abbottabad

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**BEFORE THE PESHAWAR HIGH COURT
ABBOTTABAD BENCH**

Writ Petition No. 296 -A/2023

Abdul Jalil son of Abdul Ghafar, resident of Garhi Ikramullah Khan, Nasir Bagh Peshawar, presently CT (Physics/ Maths) BPS-15, GMS Sari Kohani, District Torghar.

...PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Torghar.

...RESPONDENTS

27 SEP 2023
 PESHAWAR BENCH
 AUTHORIZED SIGNATURE

2023-1994
 01-03-23
 FILED TODAY

ADD. REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 2/3/23

RE-FILED TODAY

ADD. REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 2/3/23

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 FOR DECLARATION TO THE EFFECT PETITIONER IN ALL RESPECTS ELIGIBLE AND ENTITLED FOR PROMOTION TO THE POST OF SST BS-16 (PHYSICS/ MATH GROUP) UNDER 40% PROMOTION QUOTA OF SCT/ CT AND RESPONDENTS UNDER THE LAW, RULES AND POLICY ARE BOUND TO ISSUE PROMOTION ORDER OF THE PETITIONER AGAINST THE

VACANT POSTS OF SST (BS-16) BUT REFUSAL BY THE RESPONDENTS FOR NOT PROMOTING THE PETITIONERS SINCE 22.04.2021 IS ILLEGAL, AGAINST THE LAW, POLICY FACTS, HENCE INEFFECTIVE UPON THE RIGHTS OF THE PETITIONER.

PRAYER:- ON ACCEPTANCE OF THIS WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO ISSUE PROMOTION ORDER OF THE PETITIONER AGAINST THE VACANT POST OF SST (BPS-16) (PHYSICS/ MATHS GROUP) W.E.F 22.04.2021 WITH ALL BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE PETITIONER.

27 SEP 2023
High Court Bench
No. 15 Evid. Ords

Respectfully Sheweth;-

May it please your lordship petitioners beg to solicit on the following factual and legal grounds;-

- 1. That the petitioner is well qualified having MA. Med Degree and was appointed as CT Teacher in Physics/ Maths Group in the respondents department on 09.04.2016 and his service was

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ADDITIONAL REGISTRAR
HIS HONOURABLE HIGH COURT
ADDL. BENCH

regularized from the date of his appointment vide notification dated 29.05.2019. The petitioner since his appointment performing his duty with devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performance. (Copies of documents, appointment notification and regularization notification are annexed as Annexure "A" "B" & "C" respectively).

2. That the department issued a Notification/ Rules on 24.07.2014, wherein the post of SST (BPS-16) can be filled through 75% promotion quota on the basis of seniority-cum-fitness from the concerned District and 75% promotion quota - was further bifurcate in the manner that 40% quota from amongst the senior certified Teacher (BPS-16) with at least five years service as senior certified teacher and certified teacher having qualification of second class Bachelor degree from recognized university from the groups with two subjects with Chemistry, Botany or Zoology or Physics, Maths "A" "B" or statics or Humanities or other equivalent group at degree level with English as compulsory subject and Bachelor of Education or

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 PESHAWAR HIGH COURT
 ABUL KALAM BENCH
 17/7/23

Master of Education provided that if no suitable candidate is available from amongst senior certified teacher for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst certified teacher, with at least five years service as such. (Copy of Notification/ Rules dated 24.07.2014 is annexed as Annexure "D").

3. That the respondents department in the year 2020 appointed two persons on the spot of SST (BPS-16) in Physics/ Maths group through Notification dated 13.05.2020 on initial quota without promoting any SCT/ CT teacher by observing 40% promotion quota of SCT/ CT to SST (BPS-16) in Physics/ Maths Group. Similarly the respondents department in the year 2021 appointed two persons on the post of SST (BPS-16) in Physics/ Maths Group through Notification dated 16.04.2021 on initial quota without promoting any SCT/ CT Teacher by observing 40% promotion quota of SCT/ CT to SST (BPS-16) in Physics/ Maths Group. It is pertinent to mention here that one of the candidate namely Inayat Khan was appointed through initial quota in the appointment

27 SEP 2023

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PESHAWAR HIGH COURT
ABBOTTABAD BENCH

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notification dated 13.05.2020 and adjusted at GHS Dour Mera is far away from his home, therefore, he again applied to GHS Shagai near to his home through initial appointment in the year 2021 and was again appointed through initial quota in the appointment notification dated 16.04.2021 and adjusted him at GHS Shagai on 21.04.2021 due to which the post of SST (BPS-16) in Physics/ Maths groups became vacant at GHS Dour Mera on 22.04.2021 due to the appointment and adjustment Inayat KHan at GHS Shagai. (Copies of notification dated 13.05.2020, notification dated 16.04.2021 and notification dated 21.04.2021 are annexed as Annexure "E" "F" & "G" respectively).

4. That respondent No. 2 through memo dated 29.07.2021 informed all the District Education Officer (Male) Khyber Pakhtunkhwa that the meeting of Departmental promotion Committee has been scheduled to be held on 13.08.2021 for promotion of CT, DM, AT, TT, SST (B/C) and ST (P/M) BPS-16 against the vacant posts available under promotion quota at different Districts and told them to attend the subject meeting and to

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 PESHAWAR HIGH COURT
 ABOTABAD BENCH
 2/3/21

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submit the subject promotion cases if fulfilling the academic and professional qualification and having the required length for promotion by 12.08.2021. The respondent No. 3 in response of notification dated 29.07.2021 directed some teachers through memo dated 01.08.2021 in which the name of the petitioner was also present, to furnish their quality personal file, service books and other relevant documents complete in all respect without adverse remarks to his office within 02 days for placing before the departmental promotion committee on which the petitioner submitted his relevant documents, but inspite that the petitioner was not promoted to the post of SST (BPS-16) in Physics/ Maths Group despite the availability of the vacant post of SST (BPS-16) in Physics/ Maths Group and eligibility of the petitioner. (Copies of Notification dated 29.07.2021 and memo dated 01.08.2021 are annexed as Annexure "H" & "I" respectively).

5. That now the respondents department have 02 available vacant posts of SST (BPS-16) in Physics/ Maths Groups which became vacant at GHS Manja Kot from the re-appointment of Inayat

27 SEP 2023
 Peshawar High Court Atd Bench
 Authorized Under S# 15 Evd Ords.

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 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 APT. 15, 16, 17 BENCH
 27/9/23

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Khan at GHS Shagai in the year 2021 and later on transfer of Abdullah Khan from GHSSS Manjakot to GHS Dour Mera and from upgradation of GMS Chund Mada Khel to GHS Chund Mada Khel through memo dated 12.09.2022. (Copies of vacant post and upgradation memo dated 12.09.2022 are annexed as Annexure "J" & "K" respectively).

6. That the petitioner was entitle for promotion to the post of SST (BPS-16) in Physics/ Maths Group and the post of SST (BPS-16) in Physics/ Maths was vacant/ available on 22.04.2021 due to the re-appointment of Inayat KHan and now 2 posts are vacant/ available in SST (BPS-16) Physics/ Maths Group in the respondents department, therefore, the appellant filed departmental appeal/ representation on 28.07.2022 to promote him on the post of SST (BPS-16) in Physics/ Maths Group w.e.f 22.04.2021 or any available vacant post of SST (BPS-16) in Physics/ Maths Group, but till date respondents not issued promotion order of the petitioner. (Copy of departmental appeal/ representation is annexed as Annexure "L").

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 PESHAWAR HIGH COURT
 ABEOTTA BENCH
 6/3/23

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7. That, the petitioner filed a Service Appeal No.1692-A/2022 before the Khyber Pakhtunkhwa Service Tribunal Peshawar and on 22.02.2023 appeal of the petitioner was dismissed as withdrawn with the observation, "*Learned Counsel for the appellant has very fairly and frankly submitted that there was no order either original or appellate and black and white enabling the appellant to approach this Tribunal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, therefore, he would not press this appeal and says that he would advise the client to take proper legal steps for seeking redressal of his grievance. Disposed of accordingly*". (Copy of appeal and order are annexed as Annexure "M" & N).

8. That, as promotion of the present petitioner is involved and the department concerned is not considering the same and as there is no other remedy in the present case, but to approach this Honourable Court which has the jurisdiction to entertain the same. Therefore, the petitioner feeling aggrieved of the same has filed writ petition on the following grounds:-

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 PESHAWAR HIGH COURT
 AHCOT PESHAWAR BENCH
 27/3/23

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GROUNDS:-

- a. That not taking action on the departmental appeal of the petitioner and not promoting the petitioner on the post of SST (BPS-16) in Physics/ Maths Group w.e.f 22.04.2021 under 40% promotion quota of SCT/ CT despite the availability of post on 22.04.2021 are against the law, rules, norms of justice and material on record, therefore not tenable.

- b. That the petitioner was eligible for promotion to the post of SST (BPS-16) in Physics/ Maths Group and the post was also available on 22.04.2021, but despite that the petitioner was not promoted on the available post of SST (BPS-16) in Physics/ Maths Group and now the respondent department have 2 vacant posts of SST (BPS-16) in Physics/ Maths and not promoting the petitioner on available vacant posts of SST (BPS-16) in Physics/ Maths Group is against the law and rules.


 S. D.
 Additional Registrar
 Peshawar High Court
 Peshawar

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 PESHAWAR HIGH COURT
 PESHAWAR
 9/2/23

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c. That the post of SST (BPS-16) in Physics/ Maths Group was vacant since 22.04.2021 due to the re-appointment of Inayat Khan and the respondent also directed the petitioner to submit his documents for promotion to the post of SST (BPS-16) in Physics/ Maths Group in the year 2021, but despite that the petitioner was not promoted to the post of SST (BPS-16) in Physics/ Maths Group under 40% promotion quota of SCT/ CT, which is against the norms of justice and fair play.

d. That in District Lower Chitral 02 posts of SST (BPS-16) in Biology/ Chemistry Group were vacant in the respondents department in the year 2021 and the teacher namely Muhammad Nawaz Sharif, who was also appointed in the year 2016 was promoted on one post of SST (BPS-16) in Biology/ Chemistry Group under 40% promotion quota of SCT/ CT vide notification dated 29.10.2021, but the petitioner was not treated like him in accordance with rules by promoting him to the post of SST (BPS-16)

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 DISTRICT LOWER CHITRAL COURT
 2/3/22

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in Physics/ Maths Group w.e.f 22.04.2021 under 40% promotion quota of SCT/ CT despite the eligibility and availability of one post of SST (BPS-16) in Physics/ Maths Group on 22.04.2021. (Copy of notification dated 29.10.2021 is annexed as Annexure "O").

e. That not promoting the petitioner on the post of SST (BPS-16) in Physics/ Maths Group w.e.f 22.04.2021 shows malafide on the part of the respondents.

f. That 02 posts of SST in Physics/ Maths Group are available in the respondents department and it is the legal right of the petitioner to be promoted on the post of SST (BPS-16) in Physics/ Maths Group on 40% promotion quota of SCT/ CT on any available post being eligible.

g. That 40% promotion quota of SCT/ CT of the department is still in field and the petitioner being eligible is entitle for promotion to the post of SST (BPS-16) on

1 SEP 2021
Pushover to the Bench
Authorized Under 15 Evid Ordns

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ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
27/3/21

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the basis of 40% promotion quota of SCT/ CT.

- h. That depriving the petitioner from his legal rights of promotion to the post of SST (BPS-16) in Physics/ Maths Group under 40% promotion quota of SCT/ CT by the respondents will damage the service career of the petitioner both in monitoring benefits as well as in future promotion chances.
- i. That the petitioner has not been treated in accordance with law and rules and has been deprived his legal rights of promotion to the post of SST (BPS-16) in Physics/ Maths Group under 40% promotion quota of SCT/ CT.
- j. That the petitioners was appointed in accordance with law and his rights have been matured for the status of promotion, thus a valid order of promotion is required to be issued in this regard.
- k. That the petitioner has rendered satisfactory, continuous service without any break for a considerable period of time, hence he is

10/12/20
 Additional High Court Judge
 Allahabad Under Sec 79 Extra Order

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 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 10/13/23

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eligible and entitled in all respect to be promoted against the post of SST (BPS-16).

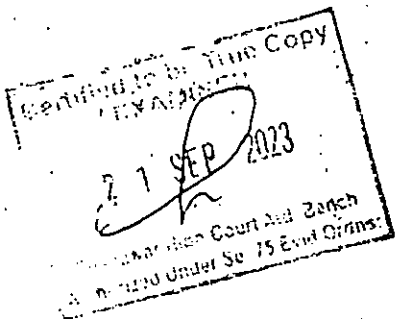
- l. That since 22.04.2021 respondents department till date not passed any orders in respect of promotions to the next higher scale.
- m. That the conduct of the respondents towards the petitioners is illegal, malafide, perverse, discriminatory, without lawful justification.
- n. That as per article 4 & 25 of the Constitution of Islamic Republic of Pakistan 1973, no discrimination can be made against any person or class on the basis of malafide intentions & no one can be deprived of his fundamental rights.
- o. That when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. The state functionaries are to deal with the employees who are at par, fairly, justly, without nepotism & Favoritism and should be strictly in accordance with law.

27 SEP 2023
Peshawar High Court And Bench
Authorized Under Sec. 75 EWO D/O

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ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
21/3/24

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- p. That this fact may not be left to fade in oblivion that the petitioner has been deprived of the right of promotion on the basis of his great length of service and vacant post of SST (BPS-16).
- q. That it is inalienable right of every citizen to be treated in accordance with law which envisages that the petitioners are entitled to be promoted against the said posts.
- r. That there is no other efficacious, speedy and adequate remedy available to the petitioners except the instant constitutional petition.
- s. That the necessary notices of filing of writ petition have been dispatched to the respondents. (Copy of notice and receipts are annexed as Annexure "P").
- t. That a court fee stamp paper worth Rs. 500/- is attached with the petition.
- u. That the other points shall be urged at the time of arguments.



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 ADDITIONAL REGISTRAR
 PESHAWAR HIGH COURT
 ABBOTTABAD BENCH
 9/27/23

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It is, therefore, humbly prayed that, on acceptance of writ petition, respondents may graciously be directed to issue promotion order of the petitioner against the vacant post of SST (BPS-16) (Physics/ Maths Group) w.e.f 22.04.2021 with all back benefits. Any other relief which this Honourable Court deems fit and proper in the circumstances of the case may also be granted to the petitioner.

INTERIM RELIEF:

In the meanwhile, the respondents may also be directed that they be restrained from filling the vacant posts of SST (BPS-16) Physics/ Maths Group or taking any adverse action against the petitioner till final decision of titled writ petition.

...PETITIONER

Through

Dated: 18-2 /2023


(HAMAYUN KHAN)

&


(FAZLULLAH KHAN)

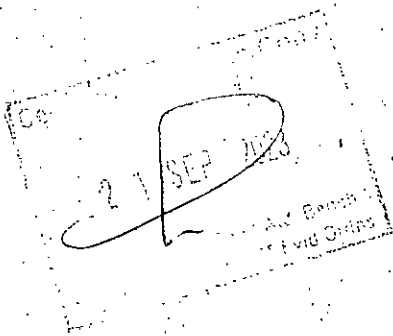
Advocates High Court, Abbottabad

VERIFICATION:-

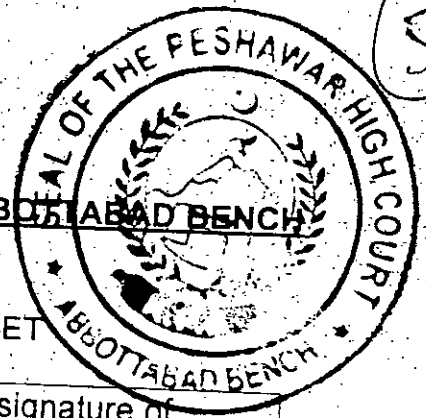
Verified on oath that the contents of foregoing writ petition are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.


...PETITIONER

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ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
PESHAWAR
21/5/23



IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH



FORM OF ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge(s).
(1)	(2)
21.09.2023	<p><u>W.P.No.296-A/2023.</u></p> <p><u>Present:-</u> M/S Muhammad Arshad Khan Tanoli and Hamayun Khan, Advocates for petitioner.</p> <p>Mr. Wajahat Hussain Shah, Asstt. A.G for respondents alongwith Fakhar Saeed Litigation Officer (ADEO Male), Torghar.</p> <p>***</p> <p><u>KAMRAN HAYAT MIANKHEL, J.-</u> Through this constitutional petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner seeks the following relief:-</p> <p>"It is, therefore, most humbly prayed that on acceptance of the instant writ petition, respondents may graciously be directed to issue promotion order of the petitioner against the vacant post of SST (BPS-16) (Physics/Maths Group) w.e.f. 22.04.2021 with all back benefits. Any other relief which this Honourable Court deems fit and proper in the circumstances of the case may also be granted to the petitioner."</p> <p>2. Facts of the case need no reiteration as the respondents in Para 5 of their comments have stated that the case of the petitioner will be</p>

Certified to be True Copy
EXAMINER
22 SEP 2023
Peshawar High Court And Bench
Authorised Under Sec 14 of the Ord.

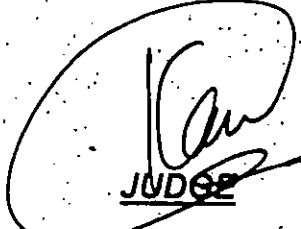
Kamran

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considered in the forthcoming Departmental Promotion Committee (DPC). The latter further stated that the DPC will be held in the month of October, 2023 and the name of petitioner is also mentioned in the same. When learned counsel for petitioner was confronted with the above situation he stated that the instant writ petition be disposed of in the light of Para 5 of the comments filed by the respondents.

3. In view of the above, this writ petition is disposed of with direction to respondents to consider the case of petitioner in the coming Departmental Promotion Committee (DPC) for the post of SST(BPS-16).

Announced
21.09.2023


JUDGE


JUDGE

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EXAMINER
22 SEP 2023
District Court, District Muzaffargarh



Promotion Order of SST of District Torghar (M) 2023

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Notification No.SO(FR)/FD/10-22(E)2010 dated 16.7.2012, the following SCT/CT,SDM/DM,SAT/AT,STT/TT,S.Qari/Qari,PSHT/SPST/PST (Male) are promoted to SST (G), SST (Bio/Chem) and SST (Math/Phy) BPS-16 (Rs.28070-2260-95870), plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

Their services are placed at the disposal of District Education Officer (M) concerned for further adjustment.

A. SST (General)

❖ PROMOTION OF SDM/DM TO SST (G) BPS-16 ON REGULAR BASIS

S#	Name	Date of Birth	School
1	Niamat Zar	17/08/1976	GHS Shagai

❖ PROMOTION OF PSHT/SPST/PST TO SST (G) BPS-16 ON REGULAR BASIS

S#	Name	Date of Birth	School
1	Said Ur Rehman	05/03/1972	GPS Dour Pain

B. SST (Bio/Chem)

❖ PROMOTION OF SCT/CT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

S#	Name	Date of Birth	School
1	Syed Hanif Shah	25/01/1990	GMS Gangat

❖ PROMOTION OF PSHT/SPST/PST TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

S#	Name	Date of Birth	School
1	Shafqat Shah	06/01/1975	GPS Tegram

C. SST (Maths/Phy)

❖ PROMOTION OF SCT/CT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

S#	Name	Date of Birth	School
1	Abdul Jalil	05/03/1991	GMS Seri Kohani

❖ PROMOTION OF PSHT/SPST/PST TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

S#	Name	Date of Birth	School
1	Munammad Aqeel	03/04/1990	GPS Bori

Terms and Conditions:-

1. They will be on probation for the period as specified in Rules (15) substituted vide - No.SO (Policies)/E&AD/1-3/2017 Dated 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989 (for Promotees Only).
2. They will be governed by such rules and regulations as may be issued from time to time by the government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.

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Promotion Order of SST of District Torghar (M) 2023

1. Their Inter-Se Seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
2. No TADA is allowed for joining the duty.
3. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made them in the light of this order, will be recovered and if wrongly promoted, will be reversed.
4. Before handing-over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Dr. Iqbal Khan)
Director

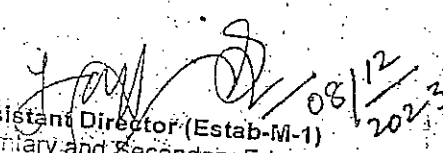
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Dated Peshawar the 08/12/2023

No 4964-69/ File/Promotion to SST/2023.

Copy forwarded for information and necessary action to the:-

1. District Education Officer (M) Torghar.
2. District Accounts Officer Torghar.
3. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. M/File.


Assistant Director (Estab-M-1)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT TOR GHAR

Email: torgharemis@gmail.com



OFFICE ORDER

55

In pursuance to the Director E&SE Khyber Pakhtunkhwa Peshawar Notification No.4964-69/File /Promotion to SST/2023 Dated Peshawar 08/12/2023. The following SCT/CT,SDM/DM and PSHT/SPST/PST (Male) on their promotion are hereby adjusted against the vacant post of SST (G), SST(Bio/Che) and SST (Math/Phy) mentioned against each in (BPS-16) (Rs.28070-2260-95870) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and conditions given below with immediate effect.

S.#	TEACHER NAME & DESIGNATION	PLACE OF POSTING	PROMOTED AS	SCHOOL WHERE ADJUSTED	REMARKS
01	Naimat Zar SDM	GHS Shagai	SST (G)	GMS Doba	A.V.P
02	Said Ur Rehman PSHT	GPS Dour Pain	SST (G)	GMS Shatal	A.V.P
03	Syed Hanif Shah CT	GMS Gangat	SST(Bio/Che)	GHS Gowandla	A.V.P
04	Shafqat Shah PSHT	GPS Tegram	SST(Bio/Che)	GHS Bimbal	A.V.P
05	Abdul Jalil CT	GMS Seri Kohani	SST (Math/Phy)	GHS Bartooni	A.V.P
06	Muhammad Aqeel SPST	Boray	SST (Math/Phy)	GHS Judba	A.V.P

TERMS & CONDITIONS:

1. They will be on probation for a period as specified in Rules (15) substituted vide No. SO(Policies) /E&AD/1-3/2017 Dated 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989 (for Promotees Only).
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their Inter-Se-seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
6. NO TA/DA is allowed for joining the duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if they are wrongly promoted, will be reversed.
8. Before handing over charge, their documents may be checked. If they have not the required relevant qualifications as per rule, they may not be handed over the charge of the post.

--SD--

District Education Officer (M)
E&SE Tor Ghar

Even No & Date

Copy for information to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Tor Ghar.
3. District Accounts Officer Tor Ghar at Mansehra.
4. District Monitoring Officer (EMA) Tor Ghar.
5. Principal/Head Masters/Head Teachers GHSS/GHSSs/GMSs/GPSs Concerned.
6. Teachers Concerned.
7. Office File.

District Education Officer (M)
E&SE Tor Ghar

To,

(50)

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The Director,

Elementary and secondary Education

Khyber Pakhtunkhwa (KP) Peshawar.

Subject: Departmental appeal against promotion order Endst no 4964-69
dated 08/12/2023

Respected Sir,

It is humbly requested that I have been promoted from CT to SST (M/P) on 08/12/2023 with immediate effect as I was eligible and entitled w.e.f 22/04/2021 and vacant post of sst(m/p) was also available in promotion quota on 22/04/2021

It is therefore most humbly prayed that on acceptance of the instant departmental appeal the appellant may kindly be consider for promotion and seniority w.e.f 22/04/2021 instead of 08/12/2023 by modifying promotion order no 4964-69 dated 08/12/2023, with all back benefits.

Note: Promotion order and necessary documents are enclosed.

Thanks

Your sincerely

Abdul Jabbar SST (M/P)

GHS Bartooni Torghar

456

26-12-2023

ADP (E & H) / DA

GH

26/12/2023

Estab - 1
No 2

29.12.23



Notification

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

R
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Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/PD/ 10-22(B)2010 dated 16.7.2012, the following CT/SCT, (Male) are promoted to the posts of SST (Bio/Chem) in DPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A. SST (Bio/Chem)

ITEM No.11-PROMOTION OF CT/SCT MALE TO THE POST OF SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	02
25% Initial Recruitment of SST (Bio/Chem)	0.5
75% Promotion Quota of SST (Bio/Chem)	1.5
40% CT/ SCT Quota to SST(Bio/Chem)	0.6
Proposed CT/SCT for Promotion to SST (Bio/Chem)	1

Sl#	Sl#	Name of Official	Name of School	Date of Birth	Date of Appnt as Regular CT	Academic & Professional Qualification	Remarks
1	40	Muhammad Nawaz Sharif	GHS: Dumborate	07/04/1992	09/03/2016	MSc Zoology CT BEd	Services are placed at the disposal of DEO (M) Lower Chitral for adjustment against the post of SST (Bio/Chem) UPS-16 on regular basis with immediate effect.

Terms and Conditions:-

- 1 He would be on probation for a period of one year extendable for another one year.
- 2 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 His service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 His Inter-Se seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining the duty.
- 7 He will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in light this order, will be recovered and if he is wrongly promoted, they will be reversed.
- 8 Before handing over charge, their documents may be checked. If he has not the required relevant qualification as per rules, he may not be handed over the charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Enst: No 5019-25 / File No.5/Promotion of SST (BPS-16)Dated Peshawar the 29/10/2021

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) Lower Chitral
3. District Accounts Officer Lower Chitral
4. Officials Concerned
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
7. M/File

Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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VAKALAT NAMA

NO. _____/2024

IN THE COURT OF KP Service Tribunal, Peshawar

Abdul Jalil (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Department (Respondent)
(Defendant)

I/We, Abdul Jalil

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2024

Jalil
(CLIENT)

ACCEPTED

Taimur Ali Khan
TAIMUR ALI KHAN
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916

Adv: Shakirullah Torzani