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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

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Muharrir Compilation

Incharge Judicial Branch

Sr	RollNo	Name	NIC	Name of School	SSC			HSSC			Bachelor			Master			MS/M.Phil/PhD			B.Ed			M.Ed(5%)/MA.Ed(10%)			Academic Marks [out of 100]		NTS Marks [Out of 100]	Total Marks [Out of 200] [E+H+I]	Address	Date Of Birth	Father Name	Candidate UC	Village Council	Remarks
					Obt	Total	20% (A)	Obt	Total	20% (B)	Obt	Total	20% (C)	Obt	Total	20% (D)	Obt	Total	10% (E)	Obt	Total	5% (F)	Obt	Total	%age (G)	[H=A+B+C+D+E+F+G]	(I)								
21	1518000634	NOUSHEEN RAZA	17101-2172235-8	GGPS Sadiq Abad Majooki	616.0	850.0	14.49	666.0	1100.0	12.11	364.0	550.0	13.24	861.0	1200.0	14.35	0.0	0.0	0.0	650.0	1100.0	2.95	0.0	0.0	0.0	57.14	65.0	122.14	MOHALLAH MASOOD KHEL P O BOX CHARSADA DSIT CHARSADA C/O BURHAN UD DIN SHOP KEEPER	08/12/1968	RAZA KHAN	MC 3 CHARSADDA	BABRA NO 08		
22	1518000038	FAREEHA NAZ	17101-3737369-2	GGPS Sadiq Abad Majooki	730.0	900.0	16.22	739.0	1100.0	13.44	349.0	550.0	12.69	2158.0	3300.0	13.08	0.0	0.0	0.0	889.0	1200.0	3.7	0.0	0.0	0.0	59.13	63.0	122.13	GULBAHAR COLONY NO 1 MARDAN RAOD NEAR NOORI PSO PUMP CHARSADDA	31/08/1993	MIAN ZIA UL HAQ	MC II CHARSADDA	PRANG YASEEN ZAI		
19	1518000038	FAREEHA NAZ	17101-3737369-2	GGPS Station Korona	730.0	900.0	16.22	739.0	1100.0	13.44	349.0	550.0	12.69	2158.0	3300.0	13.08	0.0	0.0	0.0	889.0	1200.0	3.7	0.0	0.0	0.0	59.13	63.0	122.13	GULBAHAR COLONY NO 1 MARDAN RAOD NEAR NOORI PSO PUMP CHARSADDA	31/08/1993	MIAN ZIA UL HAQ	MC II CHARSADDA	PRANG YASEEN ZAI		
23	1517000116	SIDRA SAEED	17101-8181960-8	GGPS Sadiq Abad Majooki	824.0	1050.0	15.7	759.0	1100.0	13.8	376.0	550.0	13.67	803.0	1200.0	13.38	0.0	0.0	0.0	760.0	1100.0	3.45	0.0	0.0	0.0	60.0	62.0	122.0	MOH TARKANAN NEW SHAMSABAD TEH / DIST CHD	01/03/1990	ABDUL SAEED	MC IV	UMAR A BAD		
20	1517000116	SIDRA SAEED	17101-8181960-8	GGPS Station Korona	824.0	1050.0	15.7	759.0	1100.0	13.8	376.0	550.0	13.67	803.0	1200.0	13.38	0.0	0.0	0.0	760.0	1100.0	3.45	0.0	0.0	0.0	60.0	62.0	122.0	MOH TARKANAN NEW SHAMSABAD TEH / DIST CHD	01/03/1990	ABDUL SAEED	MC IV	UMAR A BAD		
24	1518000650	FARAH ARIF	17101-3208887-2	GGPS Sadiq Abad Majooki	781.0	1050.0	14.88	894.0	1100.0	16.25	3.46	4.0	17.3	3.46	4.0	17.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	65.73	56.0	121.73	GHARI SHAHBAZ KHAN PRANG CHARSADDA P/O PRANG	1995-2-2	HAJI ARIF KHAN	MC 2	MIAN KILLI		
21	1518000650	FARAH ARIF	17101-3208887-2	GGPS Station Korona	781.0	1050.0	14.88	894.0	1100.0	16.25	3.46	4.0	17.3	3.46	4.0	17.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	65.73	56.0	121.73	GHARI SHAHBAZ KHAN PRANG CHARSADDA P/O PRANG	1995-2-2	HAJI ARIF KHAN	MC 2	MIAN KILLI		
25	1518001145	NEELMA SALAM	17101-0873518-6	GGPS Sadiq Abad Majooki	548.0	850.0	12.89	689.0	1100.0	12.53	395.0	550.0	14.36	845.0	1200.0	14.08	0.0	0.0	0.0	726.0	1100.0	3.3	0.0	0.0	0.0	57.16	64.0	121.16	DISTRICT AND TEHSIL CHARSADDA STATION KORONA STREET 2	1989-3-9	DARUS SALAM	MCIV CHARSADDA	UMAR ABAD		
22	1518001145	NEELMA SALAM	17101-0873518-6	GGPS Station Korona	548.0	850.0	12.89	689.0	1100.0	12.53	395.0	550.0	14.36	845.0	1200.0	14.08	0.0	0.0	0.0	726.0	1100.0	3.3	0.0	0.0	0.0	57.16	64.0	121.16	DISTRICT AND TEHSIL CHARSADDA STATION KORONA STREET 2	1989-3-9	DARUS SALAM	MCIV CHARSADDA	UMAR ABAD		
26	1518000280	SIDRA JAVED	17101-3385226-4	GGPS Sadiq Abad Majooki	702.0	1050.0	13.37	718.0	1100.0	13.05	336.0	550.0	12.22	3.65	4.0	18.25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	56.89	64.0	120.89	SHEIKH ABAD RAJJAR TEH AND DISTT CHARSADDA	1995-3-20	JAVED ULLAH	RAJJAR 1	SHEIKH ABAD		
27	2819000297	SONY LAL MUHAMMAD	17101-1606803-2	GGPS Sadiq Abad Majooki	705.0	1050.0	14.08	758.0	1100.0	14.51	321.0	550.0	11.67	705.0	1100.0	12.82	0.0	0.0	0.0	655.0	1200.0	3.59	0.0	0.0	0.0	57.36	63.0	120.36	MORDAN ROAD QUAD ABAD NO 2 CHARSADDA	1996-1-3	LAL MUHAMMAD	MC 4 CHARSADDA	MUSLIM ABAD 10		

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1415/2017

BEFORE: MR. KALIM ARSHAD KHAN CHAIRMAN
MRS. RASHIDA BANO MEMBER-(J)

Mst. Shahida Gul, PET, Government Middel School, Kutar Pan, District
Nowshera. (Appellant)

VERSUS

1. The Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
2. Director Elementary & Secondary Education, Peshawar.
3. District Education Officer (F), Nowshera.

(Respondents)

Mr. Kabir Ullah Khattak
Advocate For appellant

Mr. Muhammad Jan
District Attorney For respondents

**SCANNED
KPST
Peshawar**

Date of Institution.....19.12.2017
Date of Hearing.....05.04.2024
Date of Decision.....05.04.2024

JUDGEMENT

RASHIDA BANO, MEMBER (J):The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 with the following prayer:

“That on acceptance of this appeal, the inaction/omission of the respondents in promoting the appellant as S.P.E.T



(BPS-16) from his due date may be declared as illegal, unlawful, against the promotion rules and norms of justice. The respondent may further please be directed to consider the appellant for promotion to the post of S.P.E.T from her due date being eligible with all back and consequential benefits. Any other remedy which this august Tribunal deems fit and appropriate that may also be awarded in favour of appellant."

2. Brief facts of the case are that appellant was appointed as PET in Education Department vide appointment order dated 16.03.2004 and is performing duty up to the entire satisfaction of his superiors. On 04.03.2017 a seniority list of PETs was issued, in which appellant was placed at Sr. No.4. Her working paper was prepared for Departmental Promotion Committee for promotion, but she was not considered. Feeling aggrieved, she filed departmental appeal which was not responded to, hence the instant service appeal.
3. Respondents were put on notice who submitted their comments on the appeal. We heard the learned counsel for the appellant as well as learned District Attorney for the respondents and perused the case file with connected documents in detail.
4. Learned counsel for the appellant has not been treated in accordance with law and rules. He further argued that not considering the appellant for promotion despite having eligibility and not taking action is against the law, facts, norms of justice and material on record, therefore, not tenable and is liable to be set aside; that inaction and omission of respondents not to promote the appellant is against the Section 9 of Civil Servants Act, 1973;

that respondents gave promotion to other employees on the basis of Al-Khair University degree but the appellant was discriminated and deprived him from his legal right of promotion in arbitrary manner, he, therefore, requested that instant appeal might be accepted.

5. Conversely, learned District Attorney contended that the appellant has been treated in accordance with law and rules. He further contended that appellant is not eligible to be considered for promotion as appellant obtained B.A Degree from Al-Khair University AJK, which is not acceptable to the department as Higher Education Commission said that the university is not recognized university; that the degree must be verified from the HEC, which is mandatory for all candidates to be considered for promotion. The HEC strictly refused to verify the degrees of Al-Khair University.

6. Perusal of record reveals that appellant was appointed on 16.03.2004 by the competent authority. The appellant has the qualification of F.A, B.A, & also passed the professional examination on 13.07.2003. The appellant was eligible for his consideration for promotion as per notification/service rules of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 13.11.2012, wherein the post of SPET can be filled by promotion on the basis of seniority-cum-fitness from amongst the Physical Education Teacher with at least five years of service as such and having qualification prescribed for initial recruitment of Physical Education Teacher. The appellant was stood at Serial No.4 in the final seniority list of PET female Nowshera, District on 04.03.2017. The working paper was prepared for Departmental Promotion Committee for the promotion of PET BPS-15 to Senior PET BPS-16, in which name of the appellant was also included at Sr.

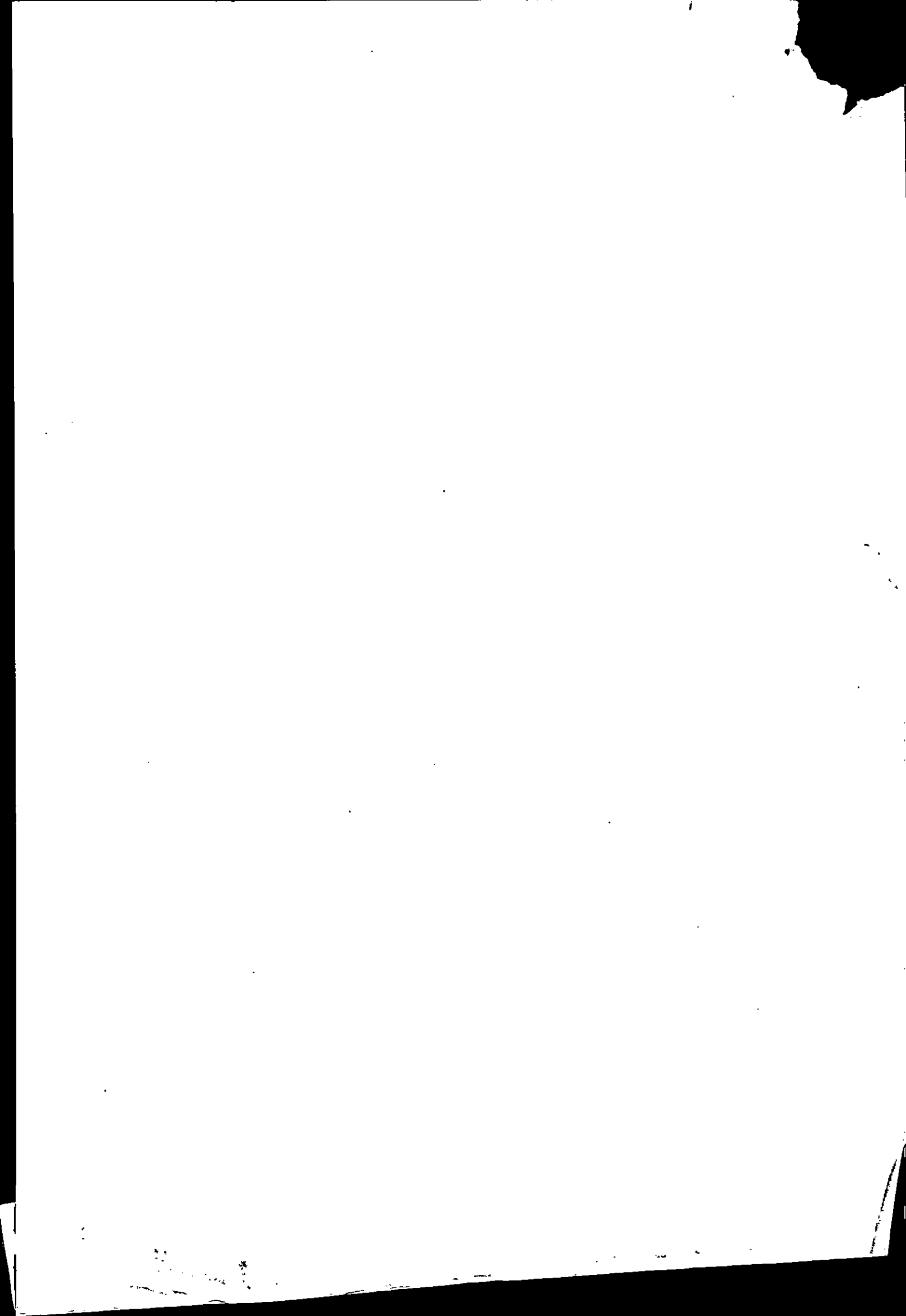
No.3, but the appellant was not considered for DPC on the ground mentioned in the remarks column as "B.A from Al-Khair University subject to verification from HEC."

7. Appellant was denied promotion on the basis of having Bachelor of Arts degree from Al-Khair University subject to verification from HEC, because Higher Education Commission vide letter dated 18.10.2016 addressed to District Education Officer Male, Nowshera, Khyber Pakhtunkhwa with the subject "verification of Educational documents of Al-Khair University, Bhimber, AJ&K" asked for provision of necessary information/records in respect of degrees or educational documents issued by Al-Khair University for verification due to fake degrees of Al-Khair University, with request to defer announcement of results for the positions

involving candidates having degrees /qualifications from Al-Khair University, Bhimber AJ&K, till the time that HEC complete process of verification of record of the University. Education commission also through another letter dated 01.01.2018 has banned the academic operations of Al Khair University with effect from fall, 2016 and suspended its degree attestation due to violation of rules and laws of as Al Khair University extended its operation far and wide in Pakistan by opening franchised campuses and illegal affiliated institutions.

8. Appellant had done her B.A from Al Khair University but from Swat franchise/campus not from the Bhimber Campus which as per letter dated 01.01.2018 was illegal campus that why B.A of the appellant was not verified by the HEC. So, appellant was rightly not promoted to the post of PET BPS-

16 by the respondent as B.A degree is also one of requisite for the promotion



beside seniority, because in year 2017, she was not eligible for the same. Appellant was promoted to the post of SPET BPS-16 vide order dated 12.06.2023 by DEO Female NRS as she had done her Bachelor of Arts from Gomal University Dera Ismail Khan in the year 2020 as her result declared on 22.12.2020 under Roll No.23613 as she was eligible for the same on 12.06.2023.

9. For what has been discussed above, we are unison to held that appellant was not eligible for promotion in the year 2017 and she was rightly not promoted to the post of Senior PET. The appeal in hand being devoid of merits, hence dismissed. Costs shall follow the event. Consign.

10. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 5th day of April, 2024.*



(KALIM ARSHAD KHAN)
Chairman

*M.Khan



(RASHIDA BANO)
Member (J)

ORDER
05.04.2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney for the respondents present.
2. Vide our detailed judgment of today placed on file, we are unison to held that appellant was not eligible for promotion in the year 2017 and she was rightly not promoted to the post of Senior PET. The appeal in hand being devoid of merits, hence dismissed. Costs shall follow the event. Consign.
3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 5th day of April, 2024.*



(KALIM ARSHAD KHAN)
Chairman



(RASHIDA BANO)
Member (J)

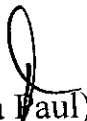
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27.02.2024 1. Junior to counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

2. Junior to counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is indisposed today. Absolute last chance is given. To come up for arguments on 27.03.2024 before D.B. P.P given to the parties.

SCANNED
K. P. ST
Peshawar

kaleemullah


(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)


27.03.2024 1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Sajida, ADEO for the respondents present.

2. Representative of respondent is directed to produce personal file of the appellant on the next date. Adjourned. File to come up for record and arguments on 05.04.2024 before D.B. P.P given to parties.

SCANNED
K. P. ST
Peshawar

Kaleemullah


(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)


24.11.2023

Clerk of learned counsel for the appellant present.
Mr. Muhammad Jan, District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to appear before the Tribunal due to illness. The appeal in hand pertains to the year 2017 and requires expeditious disposal, therefore, last opportunity granted. Adjourned. To come up for arguments on 14.12.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)


Naeem Amin

14.12.2023 1. Clerk to counsel for the appellant present. Mr. Muhammad Jan learned District Attorney for the respondent present.

2. Lawyers are on strike, therefore, the case is adjourned. To come up for arguments on 27.02.2024 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


Muhammad Akbar Khan
Member (E)


Rashida Bano
Member (J)

12.07.2023

Syed Noman Ali Bukhari, Advocate for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. The appeal in hand pertains to the year 2017 and requires early disposal, therefore, learned counsel for the appellant shall positively address the arguments on the next date. Adjourned. To come up for arguments on 11.08.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
K.P.S.T
Peshawar

Naeem Amin



(Rashida Bano)
Member (J)



(Salah-ud-Din)
Member (J)

11.08.2023

1. Clerk of counsel for the appellant present. Mr. Fazal Shah Mohmand learned Additional Advocate General for the respondents present.

2. Former requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 24.11.2023 before D.B. P.P given to parties.

SCANNED
K.P.S.T
Peshawar

Ullah



(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)

11.05.2023

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Khan, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 09.06.2023 before the D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)
Member (E)

(Salah-ud-Din)
Member (J)

Naeem Amin

09.06.2023

Clerk of learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 12.07.2023 before the D.B. Parcha Peshi given to the parties.

(Fareeha Paul)
Member (E)

(Salah-ud-Din)
Member (J)

Naeem Amin

SCANNED
KFST
Peshawar

SCANNED
KFST
Peshawar

22.11.2022

Learned counsel for the appellant present. Mr. Muhammad Adéel Butt Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come for arguments before the D.B. on 13.01.2023.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

13.01.2023

Lawyers are on strike today, therefore, case is adjourned to 10.03.2023 for arguments before the D.B. Office is directed to on the notice board as well as website of the Tribunal. ~~and~~ the ~~appellant~~

SCANNED
KPST
Peshawar


(FAREEHA PAUL)
Member (E)


(ROZINA REHMAN)
Member (J)

10-3-23

Proposed Bench is in complete, There fore
case is adjourned to 11.05.23.

17-2-22

Due to retirement of the Hon,ble
chairman the case is adjourned to
come up for the same as before on

3-6-77

Amir
Razvi

03.06.2022

Syed Noman Ali Bukhari, Advocate (Junior of learned
counsel for the appellant) present. Mr. Muhammad Adeel Butt,
Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for
adjournment on the ground that learned counsel for the appellant
is busy in the august Peshawar High Court Peshawar. Adjourned.
To come up for arguments on 09.08.2022 before D.B.

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

9-8-2022

Due to the Public holiday the case
is adjourned to 22-11-2022

26.05.2021

Learned counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Former requested for adjournment on the ground that he has not gone through the record. Last opportunity is given. Adjourned. To come up for arguments before D.B on 15.09.2021.

(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

(SALAH-UD-DIN)
MEMBER (JUDICIAL)

15.09.2021

Mr. Taimur Ali Khan, Advocate junior of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august High Court. Adjourned. To come up for arguments before the D.B on 13.12.2021

(ATIQ UR REHMAN WAZIR)
MEMBER (EXECUTIVE)

(SALAH UD DIN)
MEMBER (JUDICIAL)

13.12.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 17.02.2022.

(Atiq Ur Rehman Wazir)
Member (E)

(Salah-ud-Din)
Member (J)

24.09.2020

Mr. Asad Mehmood, Advocate junior of Mr. M. Asif Ali Yousafzai, Advocate on behalf of the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General is present.

Junior to counsel for the appellant is seeking time for arguments as his senior counsel was busy before the Hona'ble Peshawar High Court, Peshawar.

Adjourned to 01.12.2020 for arguments before D.B.

(Mian Muhammad)
Member (E)

(Muhammad Jamal)
Member(J)

12.12.2020

Due to pandemic of Covid-19, the case is adjourned to 12.02.2021 for the same as before.

Reader

12.02.2020

Due to COVID-19, the case is adjourned for the same on 26.05.2021.

READER

26.02.2020

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 02.04.2020 before D.B.


Member


Member

02.04.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 29.06.2020 before D.B.


Reader

29.06.2020

Due to public holiday on account of COVID19, the case is adjourned to 24.09.2020 for the same as before.


Reader

20.09.2019

Clerk to counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Clerk to counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 11.11.2019 before D.B.

Member

Member

11.11.2019

Mr. Taimur Ali Khan, learned counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 01.01.2020 for arguments before D.B.

(Ahmad Hassan)

Member

(M. Amin Khan Kundi)

Member

01.01.2020

Learned counsel for the appellant present. Mr. Riaz Paindakhel learned Assistant Advocate General for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for further proceedings on 26.02.2020 before D.B.

(Hussain Shah)


Member

(M. Amin Khan Kundi)

Member

10.04.2019

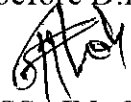
Junior to counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for respondents present. Junior to counsel for the appellant seeks adjournment on the ground that senior counsel for the appellant is not available today. Adjourned. Case to come up for arguments on 30.05.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

30.05.2019

Mr. Taimur Ali Khan, Junior counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel is not available today. Adjourned to 24.07.2019 for arguments before D.B.

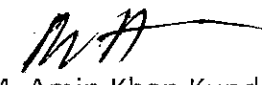

(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

24.07.2019

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District ^{Attorney} for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 20.09.2019 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

15.11.2018

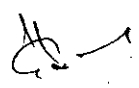
Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 04.01.2019.


READER

04.01.2019

Learned counsel for the appellant and Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 04.03.2019 before D.B


Member


Member

04.03.2019

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 10.04.2019 before D.B.


(M. HAMID MUGHAL)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

06.08.2018

Junior to counsel for the appellant and Mr. Zia Ullah, learned Deputy District Attorney present. Junior counsel for the appellant submitted rejoinder which is placed on file and seeks adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 28.09.2018 before D.B.



(Muhammad Amin Kundi)
Member



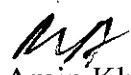
(Muhammad Hamid Mughal)
Member

28.09.2018

Counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Counsel for the appellant seeks adjournment. Granted. Case to come up for arguments on 03.10.2018 before D.B.



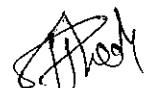
(Ahmad Hassan)
Member



(M. Amin Khan Kundi)
Member

03.10.2018

Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney. Junior to counsel for the appellant seeks adjournment on the ground that his senior is not available today. Adjourned. To come up for arguments on 15.11.2018 before D.B.



(Hussain Shah)
Member



(Muhammad Hamid Mughal)
Member

13.03.2018 Counsel for the appellant present. Mr. Riaz Paindakhel, Assistant AG alongwith Mr. Inayat Ullah, ADO for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 27.03.2018 before S.B.

(M. Hamid Mughal)
Member

27.03.2018 Appellant alongwith clerk to counsel present. Mr. Kabir Ullah Khattak, Addl. AG alongwith Mr. Inayat Ullah, ADO for the respondent present. Written reply submitted. To come up for rejoinder and arguments on 05.06.2018 before D.B.

Member

05.06.2018 Junior to counsel for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Tayyab Gul, Supdt for respondents present. Junior to counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 06.08.2018 before D.B.

(Ahmad Hassan)
Member

(Muhammad Hamid Mughal)
Member

08.01.2018

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving in Education Department as Physical Education Teacher (BPs-15). It was further contended that the appellant was deferred by Departmental Promotion Committee from promotion to the post of Senior Physical Education Teacher (BPS-16) on the ground of verification of B.A degree of Al-Khair University from HEC. It was further contended that it was responsibility of the department to send the degree for verification before deferring the appellant therefore, the deferring the appellant from promotion by the Departmental Promotion Committee is illegal and liable to be set-aside/rectified.

The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, thereafter notice be issued to the respondents for written reply/comments for 26.02.2018 before S.B.

MA
(Muhammad Amin Khan Kundi)
Member

Appellant Deposited
Security & Process Fee

26.02.2018



Counsel for the appellant and Addl AG for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply on 13.03.2018 before S.B.

AH
(Ahmad Hassan)
Member(E)

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 1415/2017

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	28/12/2017	<p>The appeal of Mst. Shahida Gul resubmitted today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 28/12/17</p>
2-	29/12/17.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/01/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

23

The appeal of Mst. Shahida Gul PET GGMS Kultar Pan Distt. Nowshera received today i.e. on 19.12.2017 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2799 /S.T,

Dt. 20/12 /2017

[Signature]
REGISTRAR 20/12/17
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Asif Yousafzai Adv. Pesh.

All objections have been removed.

[Signature]

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

SCANNED
KFS
Peshawar

APPEAL NO. 1415 /2017

Mst. Shahida Gul

V/S

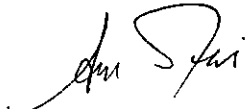


Education Deptt:

INDEX

S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	01-04
2.	Copy of B.A Certificate	--A--	05
3.	Copy of working paper	--B--	06-07
4.	Copy of notification/rule	--C---	08-23
5.	Copy of seniority list	--D--	24-25
6.	Copy of Departmental Appeal	---E---	26
7.	Copy of verification	---F--	27
8.	Vakalat Nama	-----	28


APPELLANT

THROUGH:


(M.ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,
& 
(S. NOMAN ALI BUKHARI)
ADVOCATE PESHAWAR

Room No. Fr-8, 4th Floor,
Bilour Plaza, Peshawar Cantt:
Contact No. 03339103240

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1415 /2017

Mst. Shahida Gul, PET,
Government Girls Middle School, Kutar Pan,
District Nowshera.

Khyber Pakhtukhwa
Service Tribunal

Diary No. 1437

Dated 19-12-2017

(Appellant)

VERSUS

1. The Secretary (E&SE), Civil Secretariat, Peshawar.
2. The Director (E&SE), KPK, Peshawar.
3. The District Education Officer (Female) Nowshera.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION AS S.P.E.T FROM HER DUE DATE WHEN DPC WAS CONDUCTED AND JUNIOR TO HER WAS PROMOTED AND THE CASE OF THE APPELLANT WAS NOT CONSIDER ON THE BASIS OF VERIFICATION OF DEGREE AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL THE INACTION/OMISSION OF THE RESPONDENTS IN PROMOTING THE APPELLANT AS S.P.E.T (BPS-16) FROM HIS DUE DATE MAY BE DELCARE AS ILLEGAL, UNLAWFUL, AGAINST THE PROMOTION RULES AND NORMS OF JUSTICE. THE RESPONDENTS MAY FURTHER PLEASE BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF S.P.E.T (BPS-16) FROM HER DUE DATE BEING ELIGIBLE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND

Filed to-day

Registrar

19/12/17

Re-submitted to -da
and filed.

Registrar

28/12/17

APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed on 16.03.2004 by the competent authority. The appellant has the qualification of the F.A, B.A, & also pass the professional examination-on-13.07.2003. Appellant had performed his duties assigned to him with zeal and devotion and up to entire satisfaction of his superiors. **Copy of B.A Certificate and working paper are attached as Annexure-A, & B.**
2. That as per notification/service-rule of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 13.11.2012, the post of SPET can be filed by promotion on the seniority of cum fitness from amongst Physical Education Teacher, with at least five years service as such and having qualification prescribed for initial recruitment of Physical Education Teacher and the appellant was eligible for promotion as per notification/service rule of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department dated 13.11.2012. **(Copy of the notification/rules is attached as Annexure- C.**
3. That the appellant was at Sr. No. 4 in the final seniority list of PET Female Nowshera District stood on 04.03.2017. The working paper was prepared for Departmental Promotion Committee for the promotion of PET BPS-15 to senior PET-BPS-16 in which the appellant name was also included i.e Sr. No. 3 but the appellant was not considered for DPC on the ground that which was mentioned in the remarks columns i.e B.A from Alkhair University subject to verification from HEC. **Copy of the seniority list is attached as Annexure-D.**
4. That though the appellant is fully eligible and entitle for promotion of S.P.E.T (BPS-16) being senior most, therefore the appellant filed department appeal against the illegal, inaction and omission of the respondents, which was not responded within the statutory period of 90 days. **Copy department appeal is attached as Annexure-E.**
5. That now the appellant comes to this august Tribunal on the following grounds amongst the others.

GROUND:

- A. That not considering the appellant for promotion to the post S.P.E.T (BPS-16) despite having seniority/eligibility, qualification and not taking action is against the law, facts, norms of justice and material on record, therefore, not tenable and is liable to be set aside.
- B. That inaction and omission of respondent department, not to consider the appellant for promotion is against the spirit of section-9 of Civil Servants Act, 1973 and service rights duly protected under the Civil Servants laws.
- C. That the apex Court has already clearly held in case of Anita Turab (PLD-2013 Supreme Court Page No. 195) that matter of tenure, appointment, posting, transfer and promotion, of service could not be dealt with in an arbitrary manner but could only be sustained if it was in accordance with law. Whenever there was statutory provision or rules or regulation of government the matter of appointment of Civil Servants that must be followed honestly and scrupulously and discretionary must be exercised and structured, transparent and reasonable manner, thus the verdict of the Honorable Supreme Court fully favours the appellant's case.
- D. That as there is no any order regarding the stoppage of promotion of appellant, therefore, the appellant has legal vested rights to be considered for promotion from the date when post is available for him in his quota. (97-SCMR-1997-515).
- E. That the Honorable Apex Court is also given the verdict that every civil servants is the legal right to be dealt with in accordance with the law and rules under the which is legal service rights are protected. Thus the appellant has legal and genuine claim.
- F. That the degree B.A degree from Alkhair University is verified by the Deputy Controller Examination on 13.05.2016 and Peshawar High Court, Peshawar also gave judgment in respect of Alkhair University and declare that Alkhair University is registered from HEC. (Copy of the verification letter is attached as Annexure-F).
- G. That the DEO (Male) Nowshera office gave promotion to some employees on the basis of Alkhair University Degree but the appellant was discriminated and deprived from his legal right of his promotion in arbitrary manner which is not tenable in the eye of law.



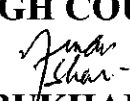
H. That the appellant seeks permission to advance the other ground and proof at the time of hearing.

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


APPELLANT

Shahida Gul

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,
& 
(S. NOMAN ALI BUKHARI)
ADVOCATE PESHAWAR

Book No. 198

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Serial No. 19799

AL-KHAIR UNIVERSITY (AJK)



DETAILED MARKS CERTIFICATE

This is to certify that Shahida Gul
 Son/Daughter of Syed Mehboob
 Registration No. AUSWT(BA) 4319-2013 Roll No. 15599
 has passed Bachelor of Arts Annual/Supplementary Examination
 held in August 20 15 in 1st Division and obtained 498 marks.

The Marks obtained in each subject are given below:-

Papers	SUBJECTS		Marks Obtained	Maximum Marks
I	English	Compulsory	120	200
II	Islamiyat, Pak, Kashmir Studies	Compulsory	72	100
III	Economics	Elective	126	200
IV	Political Science	Elective	108	200
V	Islamic Studies	Optional	72	100
VERIFIED				
MUHAMMAD USMAN Deputy Controller of Examinations Al-Khair University (AJK)				
TOTAL:			498	800

Note: This DMC is issued, errors and omissions excepted, as a NOTICE only. Any one appearing in it does not in itself confer any right or privilege independently to the grant of a degree Certificate / Degree which will be issued under the Regulations in due course.

Bhimber, the 27th October, 2015.

ATTESTED

Attested
g/c 70

Head Mistress
G.G.M.S.
Kotarpan (NSR)

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PET TO JED (B)

(B)

DISTRICT EDUCATION OFFICER FEMALE NOWSHERA

**Working Papers for Departmental Promotion Committees for
the promotion of PET B-15 to Senior PET B-16**

Total No of PET Sanctioned posts =					83				
1/3 Share of Senior PET Posts =					27				
Share of Promotion 100% =					27				
Alreay Promoted=					23				
Net to be Promoted =					4				
Proposed for promotion =					4				
S. #	S.L #	Present Place of Posting	Teacher Name	Father Name	Acad: Qual:	Date of Birth	Date of Appointment as Regular PET	Whether Eligible for Up gradation	Remarks
1	1	GGHS Dag Behsud	Raheela Bibi	Aurang Zeb	SSC	01/01/58	06/02/82	No	Not fulfilled the required qualification.
2	2	GGHS, Pabbi	Majan Begum	Munawar Khan	FA	05/05/73	25/04/00	No	Not fulfilled the required qualification.
3	3	GGMS Kutar Pan	Shahida Gul	Syed Mehboob	B.A	09/09/76	16/03/01	Yes	BA from Al-Khair University, subject to verification from H.E.C.
4	4	GGHS, Kahi	Samreen Akhtar	Shadani Khan	M.A/M.B.Ed	15/10/84	01/09/07	Yes	Documents Available
5	5	GGMS, ASC Colony	Noshreen Akhtar	Bakhtiar Sillahi	B.A	01/01/86	01/09/07	Yes	Documents Available
6	6	GGHS, Khatkalli	Hameeda Daud	Muhammad Daud	B.A	01/04/77	01/09/07	Yes	Documents Available

to 4-6 Certificate:

1 It is certified that all the PETs (Female) included in the panel for the promotion

a) Hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.

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- b) Have completed the required minimum length of qualifying service and qualifications as required for promotion of PET B-15 to Senior PET B-16 under the Rules.
 - c). None of them is on deputation to any organization under the Federal/provincial/Autonomous/Semi autonomous/International Organizations
 - d). Neither any disciplinary/departmental proceedings/Anti corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of
 - e). No one is on long leave/Ex. Pakistan leave.
 - f). Their ACRs, Synopsis are free from adverse remarks
 - g). They are all alive and serving.
 - h). Their appointments order against PETs posts are attached herewith.
 - i). The Seniority List of B-15 Officials is final, undisputed and not subjudice.
2. The Departmental Promotion Committee is requested to determine the suitability of the above PETs for promotion of PET B-15 to Senior PET B-16 with immediate effect.

✓
District Education Officer
(Female) Nowshera
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

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DE T Page 10 S/No 18

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

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 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

KPK

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.
8. Copy to Malgari Ustazan KPK

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8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director Database(EMIS), E&SE Department.
12. All District Coordination Officers in Khyber Pakhtunkhwa.
13. All Executive District Officers Elementary & Secondary Education in Khyber Pakhtunkhwa.
14. All District Accounts Officers in Khyber Pakhtunkhwa / Agency Accounts Officers FATA.
15. All Agency Education Officers FATA.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. PS to Secretary E&SE Department.
21. Master File.

KPK

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Section Officer (Primary)

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APPENDIX

3

S.No.	Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Secondary School Teacher (BPS-16).	(i) Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or (ii) M.A in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner: (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3; (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No.3; (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3.

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				<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4.	Senior Certified Teacher (SCT)(General) (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

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5.	Senior Certified Teacher (Industrial Arts) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).
7.	Senior Drawing Master (BPS-16).		By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
8.	Senior Certified Teacher (SCT) (Home Economics) (BPS-16). <i>KPK</i>	<i>U.S.</i>	By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
9.	Senior Physical Education Teacher (BPS-16).		By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

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10.	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shalidatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
12.	Senior Qari (BPS -15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
13.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

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		Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.		<p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
14.	Certified Teacher (Industrial Arts) (BPS-15)	<p>(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or</p> <p>(b) Bachelor's Degree from a recognized</p>	18 to 35 years.	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>

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	<p>University with nine months training from any Government Agro. Technical Teacher Training Center of the Level of Certified Teacher, Agro.technical (Industrial Arts).</p>		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for Promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>15. Certified Teacher (Agriculture) (BPS-17)</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro. Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject from a recognized University; or</p> <p>(iii) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the</p>

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		<p>any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).</p>		<p>promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>16.</p>	<p>Certified Teacher (Home Economics) (BPS-15).</p> <p>KPK</p>	<p>(i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center; or</p> <p>(ii) Certified Teacher Certificate with Home Economics as one of the subjects, from any Government Training school or college with Bachelor's Degree; or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or</p> <p>(iv) Bachelor's Degree, from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of</p>

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		<p>University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).</p>		<p>Certified Teacher (Home Economics). <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>17.</p>	<p>Drawing Master (BPS-15).</p>	<p>Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.</p>	<p>18 to 35 years.</p>	<p>(a) Eighty per cent by initial recruitment; and (b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master: Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master. <u>Note:</u> In case of non-availability of suitable candidate, for promotion, then by initial recruitment.</p>

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18.	Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
19.	Primary School Head Teacher (PSHT) (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20.	Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

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				with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University.	18 to 35 years.	By initial recruitment on merit at Union Council level: provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

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SCHEDULE

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

Arabic Teacher

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

Theology Teacher

Category of Qualification	Total Marks 100
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/BSc	Marks obtained X 20 / total marks =
MA/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks =
M.A Islamiat / Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimatul Wafaqul Madaris	Marks obtained X 15 / total marks =
MPhil/PhD	Marks = 05

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Drawing Master

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
DM Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

Physical Education Teacher

Category of Qualification	Total Marks 100	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ____	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 20 / total marks = ____	
BA/BSc	Marks obtained X 20 / total marks = ____	
JDPE or Equivalent Certificate	Marks obtained X 20 / total marks = ____	
MA/MSc/M.Ed / MA Edu	Marks obtained X 15 / total marks = ____	
MPhil/PhD	Marks = 05	

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Primary School Teacher

Category of Qualification	Total Marks 100 For Humanities group at Intermediate Level	For Candidate of Science group
SSC	Marks obtained X 20 / total marks = ___	5 Extra marks for F.Sc, 5 Extra marks for B.Sc and 5 Extra marks for M.Sc will be added to the total score obtained by a candidate during his selection
HSSC	Marks obtained X 10 / total marks = ___	
B.A/BSc	Marks obtained X 25 / total marks = ___	
PST Certificate/ Diploma in Education / ADE.	Marks obtained X 20 / total marks = ___	
MA/MSc/M.Ed / MA Edu	Marks obtained X 20 / total marks = ___	
MPhil/PhD	Marks = 05	

Other conditions:-

1. The concerned Appointing Authority will scrutinize and verify the documents and make the appointment as per prescribed rule and the will get the documents verified after the issuance of appointment orders within shortest possible time, not exceeding ninety (90) days.
2. The merit list prepared by the concerned appointing authority shall be displayed for ten days to receive the objections/appeals, if any, and shall issue the final merit list after making necessary corrections while addressing the observations/objections/appeals, followed by requisite appointment orders.
3. In case a document(s) is/are found fake/ forged/ bogus upon scrutiny/ verification, the service of the teacher concerned shall be terminated and the amount paid to him as salary shall be recovered from him and an FIR shall be lodged against him on account of forgery/fraud under the relevant law.
4. Deni Asnad from recognized Tazeemat-ul-Wafuqul Madaris, Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time will be acceptable for the purpose of appointment against the posts of Arabic Teachers or Theology Teachers, as the case may be.

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OFFICE OF THE DISTRICT EDUCATION OFFICE (FEMALE) NOWSHERA

FINAL SENIORITY LIST OF P.E.T. (FEMALE)

S.No.	School Name	Teacher Name	Father Name	Domicile	BPS	Academic Qualification	Sub-MA	Date of Passing Professional Examination	PBA Divn	Date of Birth	Date of 1 st Appnt.	Date of Regular Appnt. (Trained)	Date Taking Over Charge Present Post	Date Taking over Charge in This Distt
1	GGHS Dag Behsud	Raheela Bibi	Aurang Zeb	NSR	15	SSC				01/01/58	06/02/82	06/02/82	06/02/82	06/02/82
2	GGMS, Kandar	Farida Begum	Sardar Hussain	NSR	15	MA	Urdu	30/08/96	2nd	14/02/68	21/03/92	30/08/96	30/08/96	30/08/96
3	GGHS, Pabbi	Majan Begum	Munawar Khan	NSR	15	FA	F.A.	25/04/00		05/05/73	14/02/96	25/04/00	25/04/00	25/04/00
4	GGHSS NSR Kalan	Shahida Gul	Syed Mehboob	NSR	15	F.A	Nil	13/07/03	Nil	09/09/75	16/03/04	16/03/04	16/03/04	16/03/04
5	GGHS Azakhel Payan	Momin Gul	Lal Badshah	NSR	15	B.A		06/07/04	2nd	10/12/71	07/09/95	06/07/04	06/07/04	06/07/04
6	GGMS, Mughulki	Rehana Khattak	Amir Ghulam	NSR	15	MA	Pol.Sc	15/12/05	2nd	05/08/79	01/09/07	01/09/07	01/09/07	01/09/07
7	GGHS Khai	Samreen Akhtar	Shadam Khan	NSR	15	M.A, M.Ed	Isl;	15/09/06	2nd	15/10/84	01/09/07	01/09/07	01/09/07	01/09/07
8	GGHS PALOSI PAYAN	Noshreen Akhtar	Bakhtiyar Shah	NSR	15	BA		15/07/06	2nd	31/01/86	01/09/07	01/09/07	01/09/07	01/09/07
9	GGMS Pushtoon Garhi	Hameeda Daud	Muhammad Daud	NSR	15	BA	Nil	27/09/05	2nd	04/04/77	01/09/07	01/09/07	01/09/07	01/09/07
10	GGHSS Rashakai	Salma	Aman Ullah	NSR	15	BA		15/12/05	2nd	14/08/78	01/09/07	01/09/07	01/09/07	01/09/07
11	GGMS Makeen abad	Farhana Habib	Habibu Rehman	NSR	15	M.A	Urdu	15/09/06	2nd	06/04/80	01/09/07	01/09/07	01/09/07	01/09/07
12	GGHS Kana Khel	Zuhra Inam	Inamullah	NSR	15	MA	Urdu	25/09/06	1st	15/03/87	22/08/07	01/09/07	01/09/07	01/09/07
13	GGHS Barabanda	Malaika	Abdussalam	NSR	15	M.A	Isla	15/09/06	2nd	24/04/86	01/09/07	01/09/07	01/09/07	01/09/07
14	GGMS Walai	Rozia Bibi	Amir Sardar	NSR	15	BA	Nil	DM-2006	2nd	01/01/87	01/09/07	01/09/07	01/09/07	01/09/07
15	GGHS Akbar Pura	Nida Tahir	Muhammad Tahir	NSR	15	BA	Nil	15/09/06	2nd	14/04/85	01/09/07	01/09/07	01/09/07	01/09/07

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	GGHS Taru Jabba	Humaira Ayub	Muhammad Ayub	NSR	15	BA	Nil	15/09/06	2nd	05/04/84	01/09/07	01/09/07	01/09/07	01/09/07
	GGMS Amankot	Huma Gul	Wadan Shah	NSR	15	B.A		15/09/06	2nd	02/11/85	01/09/07	01/09/07	01/09/07	01/09/07
	GGHS Kurvi	Bozia Amin	Amin Khan	NSR	15	M.Sc	HPE	15/09/06	2nd	05/08/82	01/09/07	01/09/07	01/09/07	01/09/07
19	GGHS Nodeh	Nazhida	Amin Khan	NSR	15	FA	Nil	15/09/06	Nil	05/08/85	01/09/07	01/09/07	01/09/07	01/09/07
20	GGHS D.I.Khel	Hina Gul	Fazal-e-lahi	NSR	15	M.So	Phy Edu	13/06/05	2nd	20/05/83	14/01/09	14/01/09	14/01/09	14/01/09
21	GGHS Mula Killi	Paiwasha	Murad Ali Khan	Mardan	15	BA		27/09/05	2nd	06/01/84	06/02/08	06/02/08	06/02/08	01/07/09
22	GGMS Pir Pai	Faiqa Farid	Faridullah	NSR	15	MScP	P.E.H	09/07/07	2nd	01/04/88	15/07/09	15/07/09	15/07/09	15/07/09
23	GHS Mohib Banda	Huma Nawab	Nawab Ali Khan	NSR	15	M.A	H P E	31/08/06	2nd	26/05/84	28/05/10	28/05/10	28/05/10	28/05/10
	GGMS Banda Sheikh Ismail	Nadia	Gohar ali	Pesh	15	B A	Nil	12/12/07	2nd	01/04/88	06/07/09	06/07/09	06/07/09	01/07/10
24	GGMS Dagi Qadeem	Gul Naz	Fathur Rahman	NSR	15	MA	HPE	15/09/08	2nd	25/03/75	11/01/03	26/05/12	26/05/12	26/05/12
25	GGMS Mughalkai	Shagufa Jawid	Javid	NSR	15	MA	Urdu		2nd	01/01/85	26/05/12	26/05/12	26/05/12	26/05/12
26	GGMS Badrashi	Haleema Sadia	Ali Sarwar	NSR	15	MA	Isl;	18/08/07	2nd	04/10/85	26/05/12	26/05/12	26/05/12	26/05/12
27	GGHS Spin Khak	Fouzia Begum	Mian Niaz Ali	NSR	15	M.Sc	Bot;	15/09/08	2nd	20/04/76	02/02/07	28/05/12	28/05/12	28/05/12
28	GGMS Turlandi	Lubna	Muhammad Safee	NSR	15	M.A	Pashto	oooo	2nd	02/03/82	25/05/12	28/05/12	28/05/12	28/05/12
29	GGHS Wazir Garhi	Salma Naz	Qaisar Khan	NSR	15	B.A		00/01/00	1st	12/05/83	28/05/12	28/05/12	28/05/12	28/05/12
30	GGHS Nizampur	Gul Nayab Khattak	Niaz Dar	NSR	15	BA	M A	15/10/08	2nd	12/12/87	28/05/12	28/05/12	28/05/12	28/05/12
31	GGHS Nizampur	Gul Nayab Khattak	Niaz Dar	NSR	15	BA	M A	15/10/08	2nd	12/12/87	28/05/12	28/05/12	28/05/12	28/05/12

Certified that this seniority list is final,undesputed and non judeceouse All the PET (F) working in District NSR are included in this S/List.

Att'd
04-03-2017
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

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Dairy No # 30

2017

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(PET) Head Mistress

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Head Mistress G.M.S. Kotarpan (NSR)

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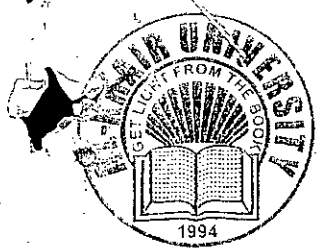
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AL-KHAIR UNIVERSITY (AJK)

Main Campus

Pindi Jhunja Road, Bhimber (A.K) Ph: 05828-454084-86-87

No. AU-2 (14) Exams/2016- 2894 *lax*

May 13, 2016

OFFICE OF THE DISTRICT EDUCATION
OFFICER (F) NOWSHERA

Subject: VERIFICATION OF DMC

Dear Sir,

With reference to your letter No.379 dated 09-04-2016, on the above mentioned subject. It is certified that the photocopy of the DMC of following student, received from your office, has been checked and found correct with our record. The same is returned herewith, duly verified with thanks.

Name	Shahida Gui
Father's Name	Syed Mehboob
Registration No.	<u>AUSWT(BA)4319-2013</u>
Examination held in	<u>August, 2015</u>
Discipline	B.A

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Yours faithfully,

Deputy Controller of Examinations

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D.E.O. (F) Nowshera
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REPLY

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal NO. 1415/ 2017

Mst. Shahida Gul..... Petitioners

VERSUS

1:- Secretary E/S Education and others.....Respondents

Respectfully Sheweth

Written comments on behalf of respondents are as under.

Preliminary Objections

1. That the appellant has no cause of action to file the instant appeal.
2. That this Honorable Tribunal has got no jurisdiction to entertain the present appeal.
3. The present appeal is bad for mis-joinder and non-joinder of necessary parties.
4. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
5. That the instant appeal is barred by law.
6. That the appeal is time barred.
7. The appellant has no locus standi to file the instant appeal.

Factual Objections:-

1. Incorrect, to the extent of the qualification of BA the appellant passed it from Alkhair University AJK which is not acceptable to the department as according to the Higher Education Commission Alkhair University AJK is not recognized University.
2. Correct, to the extent of Notification dated 13/11/2012 the remaining para is incorrect. The appellant was not eligible for promotion on the basis of BA from Alkhair University AJK.
3. Correct. The appellant degree shall be sent to Higher Education Commission for verification if HEC verified the degree of the appellant she will be considered for promotion.
4. Incorrect. Only seniority is not criteria for promotion. Criteria for promotion is seniority cum fitness (Eligibility) The appellant is not eligible for promotion on the basis of BA from Alkhair University being unrecognized University with HEC.
5. No comments.

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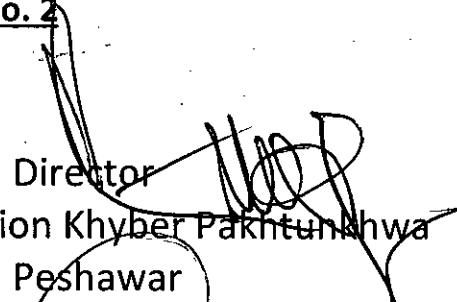
GROUNDS

- A. Incorrect. The act of the respondent is according to Law, Rules and Policy.
- B. Incorrect. The act of the respondent is according to Civil Servants Act and Civil Servants Laws.
- C. Incorrect. The case of the appellant is not identical with Aneeta Turab Case.
- D. Incorrect. The appellant is not eligible to be considered for promotion.
- E. Incorrect. The claim of the appellant is illegal.
- F. Incorrect. The BA degree from Alkhair University must be verified from Higher Education Commission which is mandatory for all candidates to be considered for promotion. The HEC strictly refused to verifying the degrees of Alkhair University.
- G. Incorrect.
- H. The respondent may also be permitted to advance additional arguments at the time of hearing.

It is, therefore, requested that the present service appeal is being meritless, devoid of force and baseless, may kindly be dismissed.

Respondent No. 1
Secretary

E & S Education Khyber Pakhtunkhwa
Peshawar

Respondent No. 2
Director
E & S Education Khyber Pakhtunkhwa
Peshawar**Respondent No. 3**
District Education Officer
(Female) Nowshera

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal NO. 1415/ 2017

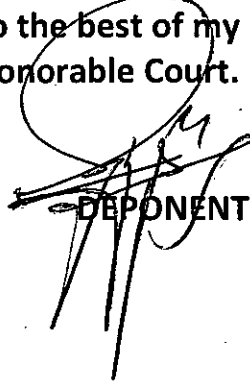
Mst. Shahida Gul..... Petitioners

VERSUS

1:- Secretary E/S Education and others.....Respondents

AFFIDAVIT

I Zulfiqar ul Mulk District Education Officer (Female) Nowshera do solemnly affirm and declared on oath that the contents of the para wise comments on behalf of respondents are true and correct to the best of my knowledge and that nothing has been concealed from this Honorable Court.


DEPONENT

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HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad Ph:90400910 Fax No.90400902
URL: www.hec.gov.pk

Assistant Director
(Accreditation & Attestation)

No. 16(08)/A&A/Acc/HEC-2014/1643
January 1, 2018

Subject: Verification of degrees of candidates possessing Al-Khair University AJK degrees applied for appointment at the post of PST and Respondent in Writ Petition No. 127-B/2016 and 712-B/2016.

Dear Sir,

Reference to your letter No. 6513/Verification/Al-Khair/Court dated November 11, 2017 on the above subject.

2. It is informed that the Al-Khair University, AJ&K, in total violation of its own law has extended its operations far and wide in Pakistan and AJ&K by opening franchised campuses and illegal affiliated institutions. Complaints about Al-Khair University regarding, poor quality of teaching, weak assessment and evaluation system, non-declaration of results and award of low quality degrees etc. became a regular feature and never been redressed by sponsors of the University despite repeated reminders. The reports have also received regarding sale of degrees. In this backdrop, the Higher Education Commission has banned the academic operations of the Al-Khair University with effect from fall, 2016 and suspended its degree attestation. It is worth to mention here that all the writ petitions filed in this regard have been dismissed by the honorable Islamabad High Court.

3. Further, the status of validity of petitioners in Writ Petition No. 127-B/16 & 712/B/2016 is given as under:

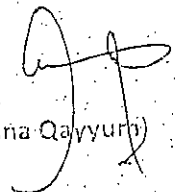
SN	Name	Father Name	Degree	Regis. No	Session	Remarks
1	Umer Nooh	Ramazan	ADE	AUSWT (ADE) 3642-2012	2012- 14	Studied in an illegal College of Swat, KPK (not recognized)
2	Muhammad Tariq	Muhammad Ibrahim	B.Ed.	AUMD (E) 201-2008	2008-9	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
3	Muhammad Tariq	Muhammad Ibrahim	ADE	AUSWT (ADE) 5105-2012	2012- 14	Studied in an illegal College of Swat, KPK (not recognized)
4	Nasruminallah	Mosam Khan	ADE	AUMD (ADE) 2281-2012	2012- 14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
5	Arif Hayat	Muhammad Yousaf	Nill	Nill	Nill	DMC/Degree not provided
6	Naqeeb Ullah	Awal Zad Khan	Nill	Nill	Nill	DMC/Degree not provided
7	Shoaib Rehman	Muhammad Ibrahim	Nill	Nill	Nill	DMC/Degree not provided
8	M.Shahid Iqbal	Faizdar Ali	BA	AUMD (BA) 2252-2012	2012- 14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
9	Zahid Iqbal	Zar Khan	ADE	AUMD (ADE) 2141-2012	2012- 14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)

10	Sajid Iqbal Fahim	Lal Muhammad	M.A. Pak Study	AUDIK (Pak) 658-2008	2009-11	Studied in an illegal College of D Khan (KPK): (not recognized)
11	Sajid Iqbal Fahim	Lal Muhammad	ADE	AUMD (ADE) 5193-2012	2012-14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
12	Zia Ur Rehman Zia	Khan Sheren	ADE	AUMD (ADE) 2140-2012	2012-14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
13	Fahad Imran	Yaqoot Rehman	Nil	NILL	Nil	DMC/Degree not provided
14	Maverid Iqbal Asim	Lal Muhammad	Nil	NILL	Nil	DMC/Degree not provided
15	Fahem Ullah	Muhammad Younas	Nil	NILL	Nil	DMC/Degree not provided
16	Nasir Ullah	Mosam Khan	ADE	AUMD (ADE) 2591-2012	2012-14	Studied in an illegal College of Muzaffarabad, AJK (not recognized)
17	Zia Ur Rehman	Muhammad Rehman	ADE	AUSWT (ADE) 3675-2012	2012-14	Studied in an illegal College of Swat, KPK (not recognized)
18	Shahid Mehmood	Gul Hassan Shah	ADE	AUSWT (ADE) 3599-2012	2012-14	Studied in an illegal College of Swat, KPK

4. From the above, it is clear that all of the above 18 candidates have studied at illegal colleges of Al-Khair University (AJK) which have no permission of HEC. Since, as per Federal Cabinet Criteria Guideline, 2002 the private sector institutions/universities are not empowered to affiliate institutions. Moreover the university has violated its own charter provisions and as well as criteria of the Commission. Therefore, based on such gross irregularities and on the recent judgement passed by the Honourable Islamabad High Court in the Writ Petition No. 2523 of 2016, any affiliation granted by Al-Khair University (AJK) to an educational institution or opening of its campuses would remain illegal unless approved by the HEC. The students enrolled in such colleges/programs cannot claim a right that their degrees be verified.

5. This issues with the approval of the Competent Authority.

Yours sincerely,



(Amna Qayyumi)

✓ The District Education Officer,
Office of the District Education Officer,
(Male),
Karak (KPK)

Copy to:

The Additional Registrar, Peshawar High Court, Bannu Branch, Bannu (KPK) in compliance of judgement detail 19-09-2017 passed by Peshawa High Corut (Bannu Bench) in the captioned Writ Petition.



(57)

HIGHER EDUCATION COMMISSION

H-9, ISLAMABAD, PAKISTAN, Website: <http://www.hec.gov.pk>

Tahir Abbas Zaidi
Director General (A&A)

No. 5-3/HEC/A&A/2016 / 1229
Dated Tuesday the October 18, 2016

Te
Am
Chigatin
2/10/16
to/mb

Subject: Verification of Educational Documents of Al-Khair University, Bhimber AJ&K

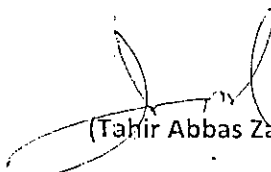
Dear Sir,

Presentation of a few fake degrees of Al-Khair University to HEC for possible attestation has led us to reassess the entire situation before taking any final stance in the matter. HEC has suspended attestation of degrees and transcripts awarded by Al-Khair University and currently evaluating the university's academic and related records to determine genuineness and validity of the awards.

2. In this milieu, it would be appropriate if your good office considers deferring announcement of results for the positions involving candidates having degrees/qualifications from the Al-Khair University, Bhimber, AJ&K till such time that HEC completes the verification of records of the University covering details of student's registration, fee deposits, examinations etc. and decides about the prospect of attestation of the degrees awarded by Al-Khair university. However, Al-Khair University's role and response to requests for provision of necessary information/records have not been encouraging so far.

3. Twelve original (Eleven amounting Rs. 3000/- each and one Bank draft amounting Rs. 2000/-) Bank Draft are returned herewith.

Best regards


(Tahir Abbas Zaidi)

The District Education Officer (Male),
Nowshera,
Khyber Pakhtunkhwa



HIGHER EDUCATION COMMISSION

Sector H-9, Islamabad Ph:90400914 Fax No.90400902

URL: www.hec.gov.pk

Assistant Director
(Accreditation & Attestation)

No. 16(08)/A&A/Acc/HEC-2014/
February 22, 2018

Subject: Verification of Certificates.

Please refer to your letter No. 2590-91/DEO(M) NSR/Verif;/SST/2015 dated January 29, 2018 on the above subject.

2. It is informed that the Al-Khair University, AJ&K, in total violation of its own law has extended its operations far and wide in Pakistan and AJ&K by opening franchised campuses and illegal affiliated institutions. Complaints about Al-Khair University regarding, poor quality of teaching, weak assessment and evaluation system, non-declaration of results and award of low quality degrees etc. became a regular feature and never been redressed by sponsors of the University despite repeated reminders. The reports have also received regarding sale of degrees. In this backdrop, the Higher Education Commission has banned the academic operations of the Al-Khair University with effect from Fall, 2016 and suspended its degree attestation. It is worth to mention here that all the writ petitions filed in this regard by Al-Khair University have been dismissed by the honorable Islamabad High Court.

3: Further, as per Federal Cabinet Criteria Guideline, 2002, the private sector institutions/universities are not empowered to affiliate institutions, whereas the university has violated its own charter provisions as well as criteria of this Commission. Moreover, Mr. Asif Khan and Mr. Shehzad Ahmad have studied in an illegal college of Al-Khair University (AJK) situated at Muzaffarabad (AK) which is not permitted by HEC. Hence, based on such gross irregularities and on the recent judgement passed by the Honourable Islamabad High Court in the Writ Petition No. 2523 of 2016, any affiliation granted by Al-Khair University (AJK) to an educational institution or opening of its campuses without permission of this Commission would remain illegal unless approved by the HEC. The students enrolled in such colleges/programs cannot claim a right that their degrees be verified. Therefore in view of the above fact, the DMC of Mr. Asif Khan and Mr. Shahzad Ahmad are verified as invalid.

4. This issues with the approval of the Competent Authority.


(Mirza Ali Raza)

District Education Officer (M)

Office of the District Education Officer (M),
Nowshera (KPK).

REJOINER ON BEHALF OF APPELLANT

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1 to 7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

1 Incorrect. While Para-1 of the appeal is correct. Moreover it is added that Alkhar University also verified the DMC of the appellant which is found correct.

2 The first portion of Para-2 of appeal is admitted correct by the respondent department while rest of the contention of the respondent is incorrect. Moreover Para-2 of the appeal is correct.

3 Admitted correct by the respondent department needs no comments.

4 Incorrect while Para-4 of the appeal is correct as mentioned in the appeal of the appellant.

5 No comments.

GROUNDS:

A) Incorrect. The act of respondent department are against the law, fact, norms of justice and material on record therefore not tenable.


B) Incorrect. While Para-B of the appeal is correct.


- C) Incorrect. While Para-C of the appeal is correct.
- D) Incorrect. While Para-D of the appeal is correct.
- E) Incorrect. While Para-E of the appeal is correct.
- F) Incorrect. While Para-F of the appeal is correct. Moreover the degree of the appellant is duly verified by the Alkhair University. Peshawar high court also gave the judgment in respect of Alkhair University registered from HEC.
- G) Incorrect. While Para-G of the appeal is correct.
- H) Legal.

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

APPELLANT

Through:

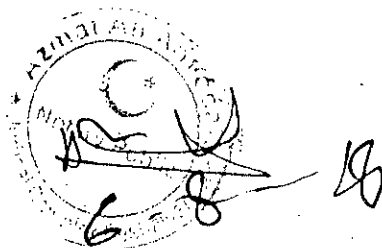

(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT

&

(S. NOMAN ALI SHAH BUKHARI)
ADVPCATE HIGH COURT

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder and appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.


DEPONENT



BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1415/2017

Shahida Gul

VS

Education Deptt:

REJOINDER ON BEHALF OF APPELLANT**RESPECTFULLY SHEWETH:****Preliminary Objections:**

(1to7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Incorrect. While Para-1 of the appeal is correct. Moreover it is added that Alkhair University also verified the DMC of the appellant which is found correct.
- 2 The first portion of Para-2 of appeal is admitted correct by the respondent department while rest of the contention of the respondent is incorrect. Moreover Para-2 of the appeal is correct.
- 3 Admitted correct by the respondent department needs no comments.
- 4 Incorrect while Para-4 of the appeal is correct as mentioned in the appeal of the appellant.
- 5 No comments.

GROUND:

- A) Incorrect. The act of respondent department are against the law fact, norms of justice and material on record therefore not tenable.
- B) Incorrect. While Para-B of the appeal is correct.

- C) Incorrect. While Para-C of the appeal is correct.
- D) Incorrect. While Para-D of the appeal is correct.
- E) Incorrect. While Para-E of the appeal is correct.
- F) Incorrect. While Para-F of the appeal is correct. Moreover the degree of the appellant is duly verified by the Alkhair University. Peshawar high court also gave the judgment in respect of Alkhair University registered from HEC.
- G) Incorrect. While Para-G of the appeal is correct.
- H) Legal.

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

APPELLANT

Through:

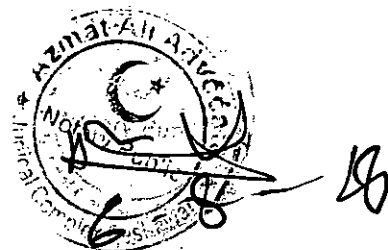
(Signature)
 (M. ASIF YOUSAFZAI)
 ADVOCATE SUPREME COURT
 &
(Signature)
 (S.NOMAN/ALI SHAH BUKHARI)
 ADVPCATE HIGH COURT

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder and appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.

(Signature)
DEPONENT

ATTORNEY





**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA**

OFFICE ORDER

Promotion order

Consequent upon recommendations of the Departmental Promotion Committee (DPC) and in pursuance of the Govt. of Khyber Pakhtunkhwa E/S Education Notification No. SO(B&A)/1-18/E&SI/2012 Dated 11/07/2012, Finance Department Endorsement No. SO(FR)/FD/10-22/(E)/2010 Dated 16/07/2012 and in pursuance of the Director E/S Education Khyber Pakhtunkhwa Peshawar office Notification No. 627-30/File No. 02/A-25/Shahida BiBi./ Promotion of (F) PET to SPET B-16/Dated Peshawar the 05/06/2023, the following Female PET B-15 are hereby promoted to the post of Female Senior PET 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 and they are further posted against newly up-graded Senior PET BPS-16 posts in the schools noted against their names:-

S.#	S.L.#	Name of Official	Name of School	Posted against Senior PET B-16 post at:-	Remarks
1	1	Shahida Gul	GGMS Kutarpan Nowshera	GGHS, Bara Banda	A.V.P

Terms and conditions:-

1. No TA/DA is allowed for joining their duties.
2. Charge reports should be submitted to all concerned.
3. She should be on probation for a period of one year extendable for another one year.
4. She will be governed by such rules and regulations as may be issued from time to time by the Government.
5. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
6. The Principals / Head Mistress / Drawing & Disbursing officers should check their original documents (Academics - Professional) before handing over charge.
7. The Principals / Head Mistress / Drawing & Disbursing officers are required to submit their necessary documents for verification to District Education Officer (Female) Nowshera along with original fee receipt.
8. The Principals / Head Mistress / Drawing & Disbursing officers should not release their pay in BPS-16 until and unless their necessary documents are verified from the University concerned. During the verification process. If any Degree / Certificate is found fake / bogus, their promotion shall stand cancelled.
9. The District Education Officer (Female) Nowshera will issue Clearance Certificates after the verification process.
10. Their inter-se-seniority on lower post will remain intact.
11. she will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in light of this order will be recovered and if she is wrongly promoted she will be reversed.
12. Those who did not join her post after promotion shall not be entitled for promotion for the next four years Head Mistress Concerned shall report the same on the expiry of joining period.

**(DURE SHAWAR)
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA**

Endst: No. 2357-63 / DEO (F) NSR /SPET/Female/Promotion / Dated: 12/06/2023

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

- 1: Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2: Senior District Accounts Officer, Nowshera
- 3: Principal/Lead Mistress Concerned.
- 4: ADEO (F) Establishment Secy: Local Office.
- 5: Superintendent Establishment Local office.
- 6: Accountant Local Office.
- 7: Office Copy.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

66

BIO DATA

- Name: Shahida Gwal
- Father Name: Syed Mehboob
- Post PET School G.G.M.S Kotarpain
- Academic Qualification: B.A.
- In Case of B.Sc.(subject) ---
- Division in BA/B.Sc. 1st
- Professional Qualification (training) received:

S. No.	Description	Institution	Period
1.	<u>IDPE</u>	<u>NPE College MRD</u>	<u>2021-22</u>
2.	<u>MP Ed</u>	<u>AWKUM</u>	<u>2020-2023</u>
- Date of Birth: 09-09-1975
- Date of 1st Joining Service and the post in Which Joined: 15-3-2004
- Record of Appointment: Attached

S.No	Post Held	BPS	Whether on Regular/Adhoc Basis	Period	
1.	PET	15	Regular	01-7-2012	Till to date
2.	PET	09	Regular	15-3-2004	30-6-2012

- Total Service 18 years 09 Months 16 Days
- Total Service on the Present Post 18 Year 09 Months 16 Days
- Detail of non-qualifying service if any ---

Signature
 ADO/Principal/Head Master
[Signature]
 Head Mistress
 G.G.M.S.
 Kotarpain (NSR)
 30/5/2023

[Signature]
 Deputy DEO
 District Education
 Officer (F)
 Nowshera
 Countersigned by DEO

(67)

ACR SYNOPSIS

In:..... R/O: Shahida Gul D/o Syed Mehbub

Government: Middle School: Kotar Pan

..... District Nowshera: Nowshera


Date of 1st Appointment: 15.03.2023

Date of promotion to Present post: 07.2012

Year	Remarks	Pen Picture	Adverse Marks if any	Whether Conveyed Or Not	Whether Expunged or Not
1. 2018	Excellent	^{Very} Comptail	NIL	NA	NA
2. 2019	Excellent	^{Very} Handwriting	✓	NA	NA
3. 2020	Excellent	Regular	✓	NA	NA
4. 2021	Excellent	^{Very} Cooperative	✓	NA	NA
5. 2022	Excellent	Suitable for promotion	✓	NA	NA

Principal/Head master
Countersigned

GUL BROTHER: 612338



Head Mistress
G.M.S.
Kotarpan (NSR)

District Education
Officer (F)
Nowshera

68

K.P.K. EDUCATION NO. 49

(CONFIDENTIAL REPORT)

TEACHING STAFF

CONFIDENTIAL REPORT FOR THE YEAR ENDING 31ST DECEMBER 2018

- 1. Name: Shahida Gul D/o Syed Mehrab
- 2. Name of service: Teaching (Education Deptt)
- 3. Qualification: B.A U.T.D.P.E
- 4. Total Service on 31st December: 14 years 28 Months & 16 days
- 5. Scale of Pay and present pay: B.P.S 15 Basic Pay 26760/Am
- 6. Various Posts held during the year with period: P.E.T
- 7. Period Report: 01-01-2018 To 31-12-2018

PARTICULARS REMARKS ON:

- 1. Judgment and sense of proportion: Good
- 2. Initiative and Drive: V. Good
- 3. Technical knowledge and Application: V. Good
- 4. Supervision and control over students: Good
- 5. Integrity: V. Good
- 6. Co-operation with staff: Excellent
- 7. Relation with Public: Good
- 8. Suitability for Promotion: Excellent
- 9. Knowledge of Language: V. Good

General Remarks

Very Competent

Shafiqul Arsh
SST (G)

General remarks by Higher Officer.

Name (in Block letter) and Designation of the reporting office with seal

[Signature]
Head Mistress
G.M.S.
Kotarpur (NSR)

District Education Officer (F)
Nowshera,

GUL BROTHER: 612333

69

K.P.K. EDUCATION NO. 49

(CONFIDENTIAL REPORT)

TEACHING STAFF

CONFIDENTIAL REPORT FOR THE YEAR ENDING 31ST DECEMBER 2019

- 1. Name: Shahida Gul D/o Syed Mehboub
- 2. Name of service: Teaching (Education Deptt)
- 3. Qualification: B.A J.D.P.E
- 4. Total Service on 31st December: 15 Years 08 Months 16 days
- 5. Scale of Pay and present pay: BPS 15 Basic Pay 28070/-
- 6. Various Posts held during the year with period: P.E.T
- 7. Period Report: 01-01-2019 To 31-12-2019

PARTICULARS REMARKS ON:

- 1. Judgment and sense of proportion: Good
- 2. Initiative and Drive: Good
- 3. Technical knowledge and Application: Good
- 4. Supervision and control over students: V. Good
- 5. Integrity: Good
- 6. Co-operation with staff: Good
- 7. Relation with Public: V. Good
- 8. Suitability for Promotion: Good
- 9. Knowledge of Language: Good

General Remarks

Hardworking

Shahid Aziz
SST (G)

General remarks by Higher Officer.

Name (In Block letter) and Designation of the reporting Office with seal

[Signature]
 Head Mistress
 G.G.N.S.
 Kotarpan (NSR)

[Signature]
 District Education
 Officer (F)
 Dera Ismael Khan

GUL BROTHER: 612338

70

K.P.K. EDUCATION NO. 49

(CONFIDENTIAL REPORT)

TEACHING STAFF

CONFIDENTIAL REPORT FOR THE YEAR ENDING 31ST DECEMBER 2020

- 1. Name: Shahida Gul D/o Syed Mehboob
- 2. Name of service: Teaching (Education Deptt.)
- 3. Qualification: B.A. TDPE
- 4. Total Service on 31st December: 16 years 08 Months & 16 days
- 5. Scale of Pay and present pay: BPS 15 Basic Pay 29420/- pm
- 6. Various Posts held during the year with period: PET
- 7. Period Report: 01-01-2020 to 31-12-2020

PARTICULARS REMARKS ON:

- 1. Judgment and sense of proportion: V. Good
- 2. Initiative and Drive: Good
- 3. Technical knowledge and Application: V. Good
- 4. Supervision and control over students: V. Good
- 5. Integrity: V. Good
- 6. Co-operation with staff: Good
- 7. Relation with Public: V. Good
- 8. Suitability for Promotion: Excellent
- 9. Knowledge of Language: Good

General Remarks

very Regular

General remarks by Higher Officer.

Shahzad Arshad
SST (G)

Name (in Block letter) and
Designation of the reporting
Office with seal

Head Mistress
G.G.M.S.
Kotaran (NSR)

District Education
Officer (F)
Maryshera

GUL BROTHER: 612338

71

K.P.K. EDUCATION NO. 49

(CONFIDENTIAL REPORT)

TEACHING STAFF

CONFIDENTIAL REPORT FOR THE YEAR ENDING 31ST DECEMBER 2021

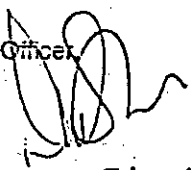
- 1. Name: Shahida Gul D/o Sayed Mehboob
- 2. Name of service: Teaching (Education Dept II)
- 3. Qualification: B.A. J.D.P.E
- 4. Total Service on 31st December: 17 Years 08 Months & 16 days
- 5. Scale of Pay and present pay: B.P.S. 15 Basic Pay 30750/pm
- 6. Various Posts held during the year with period: PET
- 7. Period Report: 01-01-2021 To 31-12-2021


PARTICULARS REMARKS ON:

- 1. Judgment and sense of proportion: V. Good
- 2. Initiative and Drive: V. Good
- 3. Technical knowledge and Application: V. Good
- 4. Supervision and control over students: Excellent
- 5. Integrity: V. Good
- 6. Co-operation with staff: V. Good
- 7. Relation with Public: Excellent
- 8. Suitability for Promotion: Excellent
- 9. Knowledge of Language: V. Good

General Remarks
V. Cooprative

Shafiqul Azam
SST (G)

General remarks by Higher Officer

**District Education Officer (F)
Nowshera,**

Name (in Block letter) and Designation of the reporting Office with seal

**Head Mistress
G.G.M.S.
Kotardan (NSR)**

GUL BROTHER: 612338

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Office Of the Principal/Head Master/ Head Mistress Government

Higher/High/Middle School

Result of Three Years

In Respect of Mr./Mst. Shahida Gh Post... P.ET.....

S/O D/O Syed Mehboob Seniority No..... 01.....

S.No	Year	Class/Sub	Total Numbers of Student	No. of Passed Students	No. of Failed Students	Result
1	2022-23	8 th	39	39	-	100%
2	2021-22	8 th	45	45	-	100%
3	2020-21	6 th	70	70	-	100%

It is certified that the above mentioned information is correct as per the School Record.

Reporting Officer

Signature:..... [Signature].....

Designation: SST.....

Office Seal:..... [Signature].....

[Signature]
District Education
Officer (F)
Nowshera

Head Mistress
G.G.M.S.
Kotarpun (NSR)
30/5/2023

73

S. No. PBR- 120878



Roll No, 2456

SSC

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION 1994 (ANNUAL)
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Shahida Gul

Son/Daughter of Sayyed Mehboob

and a student of Govt:Girls High School, No.1 Nowshera Kalan

has passed the Secondary School Certificate Examination

of the Board of Intermediate and Secondary Education, Peshawar held in March 1994.

as a *Regular candidate*. He/She obtained 421 Marks out of 850

and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|---------------------|-----------------|
| 1. English | 3. Islamiyat | 5. Gen: Science | 7. Isl. Studies |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Mathematics | 8. E.H.E. |

He/She has been awarded Grade D on the basis of Internal assessment by the Institution concerned.

Date of birth according to admission form is Ninth September
one thousand nine hundred and Seventy Five (09-9-1975)

Asst. Secretary
4th August, 1994.

This certificate is issued without alteration or erasure.

Secretary

Attested
District Education
Officer (I)
Nowshera.

Head Mistress
G.G.M.S.
Kotarpah (NSR)

Attested
Head Mistress
G.G.M.S.
Kotarpah (NSR).

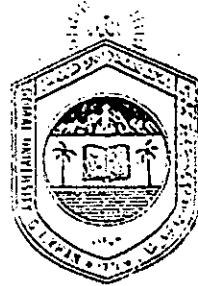
Serial No. GU 008259

74



GOMAL UNIVERSITY

DERA ISMAIL KHAN
KHYBER PAKHTUNKHWA, PAKISTAN



Registration No. _____

Roll No. _____

(Session _____)

_____ of _____

a student of _____

has passed the prescribed Examination in _____ 20__

is hereby awarded the Degree of

BACHELOR OF ARTS

in _____ Division by GOMAL UNIVERSITY.

The Examination was taken as a whole / in parts.

Result declared on _____

Attested

Countersigned

Head Mistress
G.G.M.S.
Kotarpan (NSR)

Head Mistress
G.G.M.S.
Kotarpan (NSR)
District Education
Officer (F)
Nowshera

Controller of Examinations

Vice Chancellor

75

Serial No. GU 006576



GOMAL UNIVERSITY
DERA ISMAIL KHAN
KHYBER PUKHTUNKHWA PAKISTAN

Registration No: 174-NCPEM-2001
Roll No: 2483
Session: 2001-2002

Provisional Certificate

This is certify that SHAHIDA GUL
Son / Daughter of SYED MEHBOOB
at the Department / Institute of NATIONAL COLLEGE OF PHY: EDU:(PVT):MARDAN
has passed J.D.P.E Examination held in AUGUST : 2002
in the subject of JUNIOR DIPLOMA IN PHYSICAL EDUCATION
He / She was placed in SECOND division.
Securing 609 marks out of 1050

The Examination was taken as Whole

Attested
[Signature]
Head Mistress
G.G.M.S
Kotarpan (NSR)

Resin Declaration Date 13-1-2003

[Signature]
DEPUTY CONTROLLER OF EXAMINATIONS
GOMAL UNIVERSITY DERA ISMAIL KHAN

Attested
[Signature]
Head Mistress
G.G.M.S.
Kotarpan (NSR)

[Signature]
District Education
Officer (F)
Nowshera

76

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)
Session 1994 (Annual/Supplementary)

Name Shahida Gul

Father's Name Sajjad mekbool Roll No. 2456

SUBJECT	Total Number of Marks Allowed	MARKS OBTAINED	
		In Figures	In Words
1. English	150	47	<p>Attested SHAHIDA HOSSAIN S.E.T. B.P.S-17 Nowshera</p> <p>Four twenty one</p>
2. Urdu	150	84	
3. Islamiyat Comp:	75	42	
4. Pakistan Studies	75	38	
5. Gen. Mathematics	100	38	
6. General Science	100	63	
7. EHF	100	52	
8. IS	100	57	
Total	850	421	

This certificate is issued errors and omission excepted

Prepared by _____
Checked by _____
Date _____ 19 _____

Attested
[Signature]
Head Mistress
G.G.M.S
Kotarpun (NSR)

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

11. Total Service _____ years _____ Months _____ Days
12. Total Service on the Present Post _____ Year _____ Months _____ Days
13. Detail of non-qualifying service if any 18 years 04^m 04 days

Signature _____
ADO/Principal/Head Master

District Education Officer (F) Nowshera
[Signature]
Head Mistress
G.G.M.S.
Kotarpun (NSR)

[Signature]
District Education Officer
Countersigned by DEO
(F) Nowshera

Attested
[Signature]
Head Mistress
G.G.M.S.
Kotarpun (NSR)

(77)

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE

Intermediate Examination Thugaitles Group
SESSION 19 98 (Autumn/Supplementary)



Sr. No. 169063

Name Shahida Gul

Father's Name Syed Jahanood

Roll No. 4663

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total In	
				Figures	Words
1. English	200			78	<i>Attested</i> <i>S.H.</i> SHAHIDA HUSSAIN S.E.T. P.P.S-17 G.O.H.B.S. Nowshera <i>Five hundred</i>
2. Urdu	200			112	
3. Islamic Education	50			46	
4. Pakistan Studies	50			100	
5. Civ	200			74	
6. Pa	200			90	
7. Is	200				
Total	1100			500	

Note: Errors/Omissions excepted.

Date _____ 19 _____

Controller of Examinations
Board of Intermediate & Secondary Education

Prepared by ? Checked by ?

gn
Head Mistress
G.G.M.S.
Kotarpun (NSR)

Shahida Gul
District Education Officer (F)
Nowshera

Attested
gn
Head Mistress
G.G.M.S.
Kotarpun (NSR)

- 11. Total Service years Months Days
- 12. Total Service on the Present Post Year Months Days
- 13. Detail of non-qualifying service if any 18 years 04 months 04 days

Signature
ADO/Principal/Head Master

AS
Deputy D.O.

78

11795

GOMAL UNIVERSITY



DERA ISMAIL KHAN

(Khyber Pakhtunkhwa, Pakistan)

DETAILED MARKS CERTIFICATE BACHELOR OF ARTS PART - I

Held in October - November :- 2020

Session 2020/ Annual

Roll No. 21613Name. SHAHIDA GULThe Candidate secured the following marks & has been placed in XXXXX Division.

SUBJECT	Total No of Marks Allotted	Marks Obtained	
		In Figure	In Words
English	75	42	Forty Two
Urdu	75	47	Forty Seven
Pashto	75	-	
Arabic	75	-	
English Elective	75	-	
Statistics	75	-	
Geography	75	-	
History	75	-	
Economics	75	-	
Political Science	75	-	
Islamic Studies	75	56	Fifty Six
Law	75	-	
Education	75	-	
Sociology	75	-	
Math-A	75	-	
Math-B	75	-	
Psychology	75	-	
Health & Physical Education	75	-	
Islamiyat ©	60	51	Fifty One
Total	285	196	One Hundred NinetySix

Result Declaration Date . 22-12-2020

Errors & Omissions Accepted

Attested
Head Mistress
G.G.M.S.
Kotarpan (NSR)

Attested
Head Mistress
G.G.M.S.
Kotarpan (NSR)

Attested
Controller of Examinations
Gomal University, D.I.Khan
District Education
Officer (F)
Nowshera

79

GOMAL UNIVERSITY



DERA ISMAIL KHAN
(Khyber Pakhtunkhwa, Pakistan)

DETAILED MARKS CERTIFICATE
BACHELOR OF ARTS PART - II

Held in October - November :- 2020
Session 2020/ Annual

Roll No. 21613
Name. SHARIDA GUL

The Candidate secured the following marks & has been placed in First Division.

SUBJECT	Total No of Marks Allotted	Marks Obtained	
		In Figure	In Words
English	75	26	Twenty Six
Urdu	75	49	Forty Nine
Pashto	75	.	
Arabic	75	.	
English Elective	75	.	
Statistics	75	.	
Geography	75	.	
History	75	.	
Economics	75	.	
Pakistan Studies	75	.	
Islamic Studies	75	30	Fifty Nine
Law	75	.	
Education	75	.	
Sociology	75	.	
Psychology	75	.	
Health & Physical Education	75	.	
Math-A	75	.	
Math-B	75	.	
Pak Study	40	19	Nineteen
Aggregate Part-I	285	196	One Hundred NinetySix
Total	550	349	Three Hundred Forty Nine

Result Declaration Date: 22-12-2020 ✓
Errors & Omissions Accepted

Attested
[Signature]
Head Mistress
G.G.M.S.
Kotarpan (NSR)

Attested
[Signature]
Head Mistress
G.G.M.S.
Kotarpan (NSR)

[Signature]
Controller of Examinations
Gomal University, D.I.Khan
[Signature]
District Education
Officer (F)
Dera Ismail Khan

80

GOMAL UNIVERSITY



DERA ISMAIL KHAN

Passed/Re-appear/Failed in Agg

DETAILED MARKS CERTIFICATE S: 2001-2002

J.D.P.E Examination 19 Annual / Supplementary/ 2nd Term.

Roll No. 2483 ✓ Held in August 2002

Mr / Miss Shahida Gul ✓

The candidate secured the following marks & has been placed in Second Division.

SUBJECTS	Total Number of Marks allotted	MARKS OBTAINED	
		In figures	In words
1) Health Education	100	37 ✓	Thirty seven ✓
2) Science of Movements	100	51 ✓	Fifty one ✓
3) Tracks & Fields	100	54 ✓	Fifty four ✓
4) Athletics	100	80 ✓	Eighty ✓
5) Gymnastics	100	82 ✓	Eighty two ✓
6) Teaching Practice	100	70 ✓	Seventy ✓
7) Games	100	61 ✓	Sixty one ✓
8) Co-Course Activities (Project)	50	35 ✓	Thirty five ✓
9) Agg of 1st term	300	159 ✓	One hundred & fifty nine ✓
TOTAL	1050	609 ✓	Six hundred & nine ✓

Controller of Examinations
GOMAL UNIVERSITY
Dera Ismail Khan

13-05-2002

No 037099 ✓

Dated 13-07-2003 ✓ 19

[Signature]
Controller of Examinations,
Gomal University, Dera Ismail Khan.

[Signature]
Attested
Head Mistress
G.G.M.S.
Kotarpan (NSR)

[Signature]
Attested
Head Mistress
G.G.M.S.
Kotarpan (NSR)
District Education
Officer (F)
Nowshera

81

Dist. Govt. KP-Provincial
District Accounts Office Nowshera
Monthly Salary Statement (April-2023)



Personal Information of Mr SHAHIDA GUL d/w/s of SA
Personnel Number: 00142012 CNIC: 1720120162860
Date of Birth: 09.09.1975 Entry into Govt. Service:

NTN:
Length of Service: 00 Years (00 Months (00) Days

Employment Category: Vocational Temporary
Designation: PHYSICAL EDUCATION TEACHE
DDO Code: NR6101-D.O.SECONDARY (F) NSR
Payroll Section: 001 GPF Section: 001
GPF A/C No: CPF VOL1 GPF Interest applied
Vendor Number: -
Pay and Allowances:

80003753-DISTRICT GOVERNMENT KHYBE

Cash Center:

GPF Balance: 522,691.00 (provisional)

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 13

Wage type	Amount	Wage type	Amount
0001 Basic Pay	49,660.00	1001 House Rent Allowance 45%	3,524.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	600.00	2199 Adhoc Relief Allow @ 10%	410.00
2316 Teaching Allowance 2021	3,224.00	2341 Dispr. Red All 15% 2022KP	4,812.00
2347 Adhoc Rel Al 15% 22(PS17)	4,812.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3015 GPF Subscription	-2,890.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-101.00	3990 Emp. Edu. Fund KPK	-135.00
4004 R. Benefits & Death Comp:	-600.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	260,000.00	-5,556.00	99,992.00

Deductions - Income Tax

Payable: 6,171.88 Recovered till APR-2023: 3,827.00 Exempted: 1542.96 Recoverable: 801.92

Gross Pay (Rs.): 71,398.00 Deductions: (Rs.): -10,782.00 Net Pay: (Rs.): 60,616.00

Payee Name: SHAHIDA GUL
Account Number: 1747-6
Bank Details: NATIONAL BANK OF PAKISTAN, 230566 SADDAR BAZAR NOWS SADDAR BAZAR NOWS.

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NSR
City: NOWSHERA
Temp. Address:
City:

Domicile: N/W Khyber Pakhtunkhwa
Email: shahidagul13@gmail.com

Housing Status: No Official

District Education
Officer (F)
Nowshera

Attested
Head Mistress
G.M.S.
Kotarpn (NSR)

System generated document in accordance with APPM 4.6.12.9(13258/20.04.2023/v4.0)
* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/03.05.2023/20-4349)



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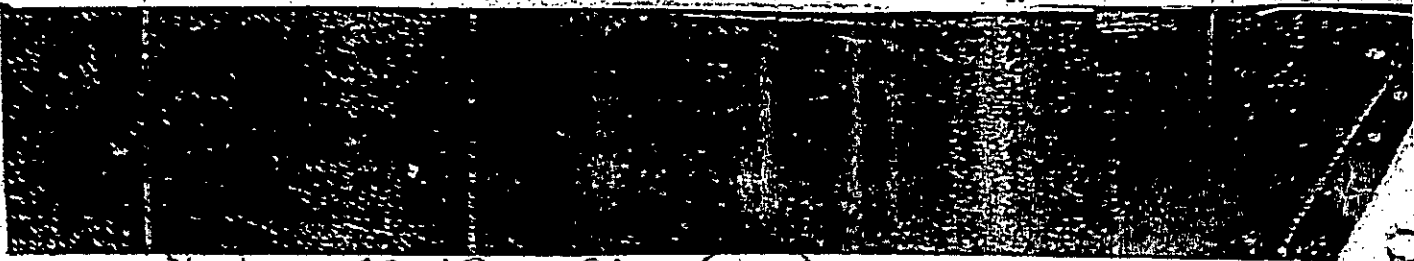
Head/Miss G.M.S. Kotipan (NSR)

Handwritten signature or initials.

Disiplin Educator
Officer (F)
MOSWALDA

Handwritten signature.

Table with multiple columns and rows of text, likely a list or schedule. The text is very faint and difficult to read, but appears to be organized in a structured format.



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NON INVOLMENT CERTIFICATE

It is certified That Mr./Miss Shahida Gul S/O D/O Syed Mehboob
Post. P.E.T. Working at Government Middle/High/Higher Secondary
School. Kotarpam, NSR Has been serving in Education Department
since 1.5.2013 Up to date without any break.

It is further certified that the above mentioned teacher is no involve in any
department/Judicial/anti-corruption/police case.

Signature: [Signature]

Scale: BPS 15

Date: 30/5/2023 ~~2011~~

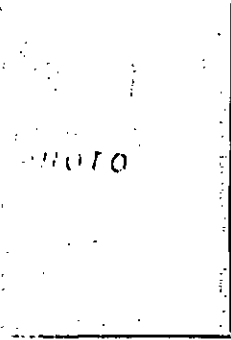
[Signature]
Head Mistress
G.G.M.S.
Kotarpam (NSR)
30/5/2023

[Signature]
District Education
Officer (F)
[Signature]

GUL BROTHER: 612338

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84



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

PANISTAN

ADDA L' EYER, ASTING GLORIOUS

BE EVER JUST TO BE ALOFT - SACRIFICE FOR NATION'S LOT

DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in N.W.F.P. having been born in this province.

I was born at Village/Mohallah... MOH: SHAH HUSSAINI VILL: NOWSHERA
Tehsil NOWSHERA District NOWSHERA

Signature of the applicant
Shahida Gul

Date 8 AUGUST 1994

Pursuance to the declaration dated 8/8/1994

filled by MISS SHAHIDA GUL s/n/d of SALD MEHBOOB
of Village NSR KALAN Mohallah SHAH HUSSAINI domiciled
in N.W.F.P. It is hereby certified that said MISS SHAHIDA GUL

parents are permanent residents of the N.W.F.P. having born with in it

I have satisfied my self from personal/my own knowledge verification that the above declaration is true and certify accordingly.

Given under my hand and seal of the Court
this 11 day of Aug 1994

District Education Officer (F) Nowshera

Attested
Head Mistress
G.G.M.S.
Kotliyan (NSR)
12.8.94

MAGISTRATE

Attested
Shahnaz Begum

COUNTERSIGNED BY

DEPUTY COMMISSIONER

SHAHNAZ BEGUM
S.E.T. (SC)
GGHSS NSR KALAN

85

1. Passed SSC Examination (Annual) 1994
 from BISE Peshawar Roll No. 2456
 obtained 42/185 marks & was placed in Grad. D.

2. Passed Intermediate (Supply) Examination 1998
 from BISE Peshawar Roll No. 4663
 obtained 500/1100 marks & was placed in Grad. D.
 Verification Roll No. dated received back

3. Passed J.O.P.E (Annual) Examination 2002 held
 Roll No. 2483 from Gomal University Dera Ismail Khan
 obtained 609/1050 + Award of Merit in Division

Principal
 G.G.M.S. Kotarpan

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. or B.A	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications—	
Drill Instructing			
Court Duties			
Reserve Duties			

District Education
 Officer (F)
 Nowshera

Head Mistress
 G.G.M.S.
 Kotarpan (NSR)
 Head Mistress
 G.G.M.S.
 Kotarpan (NSR)

N.B - Line to be drawn under the qualification possessed.

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
PEI GGH-SS NSR Kalan.			BRS-02 Rs. 2410-145-6760			16 ⁰³ / ₂₀₀₄	
			55B/Temp Rs. 2410% PM				
do	do		Rs. 2555% PM			12 ⁰¹ / ₂₀₀₄	
			BRS-09 Rs. 2770-165-7720				
do	do		Rs. 2935% PM			07 ⁰¹ / ₂₀₀₅	
do	do		Rs. 3100% PM			12 ⁰¹ / ₂₀₀₅	
do	do		Rs. 3265% PM			12 ⁰¹ / ₂₀₀₆	
			Revised BRS-02 Rs. 3185-190-8885				
do	do		Rs. 3755% PM			07 ⁰¹ / ₂₀₀₇	
do	do		Rs. 3945% PM			12 ⁰¹ / ₂₀₀₇	
			Revised BRS-09 Rs. 3820-230-10720				
do	do		Rs. 4745% PM			07 ⁰¹ / ₂₀₀₈	
do	do		Rs. 4970% PM			12 ⁰¹ / ₂₀₀₈	
do	do		Rs. 5200% PM			12 ⁰¹ / ₂₀₀₉	
do	do		Rs. 5430% PM			12 ⁰¹ / ₂₀₁₀	

APR 2011
HARSHANA DEPT
G.O. (M.A. 91)
1000/2011
Muzumdar (NSR)

9	10	11	12	13	14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason or condition (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government	Reference to any records maintained to ensure compliance with the Government orders
R. Anand Principal GHSS Nsr Kalan	30/11/2004	Annual inc.	R. Anand Principal GHSS Nsr Kalan	13 days	Appointed as trained PET	-
R. Anand Principal GHSS Nsr Kalan	30/06/2005	Revision of scale	R. Anand Principal GHSS Nsr Kalan	-	Appointed as trained PET	-
R. Anand Principal GHSS Nsr Kalan	30/11/2005	Annual inc.	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/11/2006	Annual inc.	R. Anand Principal GHSS Nsr Kalan	-	-	-
-	-	-	-	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/06/2007	Revision of scale	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/11/2007	Annual inc.	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/06/2008	Revision of scale	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/11/2008	Annual inc.	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/11/2009	Annual inc.	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/11/2010	Annual inc.	R. Anand Principal GHSS Nsr Kalan	-	-	-
R. Anand Principal GHSS Nsr Kalan	30/06/2011	Revision of scale	R. Anand Principal GHSS Nsr Kalan	-	-	-

District Education Officer (F) Nowsheera

Head Mistress G.G.M.S. Kotarpan (NSR)

89

4603

Humanities

EA



Board of Intermediate and Secondary Education Peshawar N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION SESSION 1998 - SUPPLEMENTARY

Principal
GCHSS Nowshera

Certify that Shahida Gul Daughter of Syad Mehboob
resident of Nowshera District Registered No. 554-B.F-95
in the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
December, 1998 as a Private Candidate. She obtained 500 Marks
placed in Grade D Representing Fair. She has been awarded Grade D
internal assessment by the institution concerned. The Examination was taken in part.

The
Secretary
[Signature]

[Signature]
SHAHMAZ BEGUM
S.E.T. (Sc)
GCHSS NSR KALAN

[Signature]
Secretary

[Signature]

District Education
Officer (I)
Nowshera,

[Signature]
Head Mistress
G.G.M.S.
Kotarpai (NSR)

[Signature]
Head Mistress
G.G.M.S.
Kotarpai (NSR)