

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT
CAMP COURT SWAT

Service Appeal No. 1504/2022

BEFORE: MR. SALAH UD DIN ... MEMBER (Judicial)
MRS. RASHIDA BANO ... MEMBER (Judicial)

Mr. Hazrat Said S/O Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil Babozai, District Malakand.

.... (Appellant)

VERSUS

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

....(Respondents)

Mr. Ahmad Hussain
Advocate

... For appellant

Mr. Inayat Ullah
Assistant Advocate General

... For respondents

Date of Institution.....12.10.2022
Date of Hearing.....02.01.2024
Date of Decision.....02.01.2024

JUDGMENT

RASHIDA BANO, MEMBER (J):The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

“On acceptance of instant appeal, respondent No.2 may kindly be directed to promote the appellant from CT BPS-15 to SST BPS-16 (Maths, Physics) from the date of issuance of notification dated 22.02.2022.”

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant is working as CT BPS-15 in GHS Saidu Sharif Swat. Respondent No. 2 vide notification dated 29.10.2021 promoted several teachers from

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various cadres but cadre of the appellant was ignored. Feeling aggrieved, appellant filed departmental appeal on 22.06.2022, which was not responded to, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that the appellant has not been treated in accordance with law and rules and respondents violated Article 4 & 25 of the Constitution of the Islamic Republic of Pakistan, 1973. He further argued that appellant is well qualified and fulfills the required qualification as well as criteria for promotion to SST-II (Maths, Physics). He further argued that few other teachers who have same academic qualification as that of the applicant have already been promoted to SST BPS-16 but appellant was ignored which is discrimination.

5. Conversely, learned Assistant Advocate General for the respondent contended that the appellant has been treated in accordance with law and rules. He further contended that appellant was not considered for promotion as SST (Maths/Physics) on the ground that the term additional qualification was not mentioned in the course certificate issued by the concerned university by the appellant rather the term professional certificate was mentioned therein. He further argued that appellant is not entitled for promotion on the ground that the respondent department has considered the promotion cases of teachers to the post of SST Maths/Physics in the DPC meeting held on certificates which were not verified/clarified by the authorities concerned. He further contended that promotion of the appellant has denied on the ground that only one teacher



namely Mohammad Ghaffar has been promoted by respondent department to the post of SST vide order dated 22.02.2022 after removing the observation regarding verification/clarification of additional subjects by the concerned authorities in according with law, rules and policy.

6. Perusal of record reveals that appellant was serving the department on the post of CT (BPS-15) upon which he was promoted on 29/07/2016. Appellant has alleged that after completion of five year of service and having required qualification being eligible for promotion to the post of SST (maths/physics) till 29/10/2021, he was waiting for the same. When respondent No.2 issued notification of promotion of various cadres by ignoring teacher including appellant of math/physics. Appellant filed a departmental appeal on 9/11/2021 which was not responded, therefore, he preferred service bearing No.936/21 which was withdrawn with permission to file fresh one. Respondent again promoted few more teachers except appellant vide notification dated 22/2/2022. Appellant filed departmental appeal on 22/6/2022 but the same was not responded by the respondent. Perusal of the minutes of the meeting of DPC dated 01/09/2021 reveals that appellant alongwith three others namely Muhammad Ghafar, Haider Ali and Rehmat Ali were deferred on the sole ground that they were having additional subject which requires further clarification from the DEO that whether additional subject can be considered as degree for the purpose of promotion or not.

7. It is pertinent to mention here that Mr. Muhammad Ghafar who was deferred in the meeting was promoted vide notification dated 22.02.2022 without conducting fresh DPC while appellant was not promoted. Respondent contended that it was decided in a high level meeting dated 26/10/2022 headed by Secretary Elementary & Security Education Department that column 3 of Secondary School Teacher Service Rule provided that at least

2nd class Bachelor Degree from a recognized University “means that additional subjects cannot be considered as Degree and in the rules there is no mention of additional subjects etc.” Wherein it was agreed to consider degree which is entered in the service book of the teacher first for promotion said decision was withdrawn in a subsequent meeting held on 08/12/2022 by mentioning that earlier decision taken in this regard in the meeting held on 26/10/2022 is subject to the amendments in the service rules, which will take time, therefore, the Directorate may proceed as per past practice till the necessary amendment in the rules which is reproduced for ready reference:

“It was clearly noted by all participants of the meeting that Column-03 of Secondary School Teacher Service Rules provides that “At least second class Bachelor Degree from a recognize University on need basis from the follow two subjects”.

A. Chemistry, Botany or Zoology

B. Physics, Maths “A” or “B” or Statistics

C. Humanities and other equivalent groups at degree with English as Compulsory subject.

II. And Bachelor of Education or Master of Education (Industrial Arts or Business Education) or MA Education or equivalent qualification from recognized University.

So, it means that at the time meeting of DPC on 01/09/2021 there was no clog upon teacher who had additional subjects and they were eligible for promotion as per above mentioned rule because decisions for not considering additional subject for promotion was taken in a meeting held on 02/10/2022 after 11 months and 25 days of DPC meeting which was held on 01/09/2021 and 8 months of issuing a notification dated 22/2/2022. So this reason had no weight in it and promotion of the appellant was deferred without any legal reason. Appellant was treated discriminately as Mr. Ghaffar with the same remarks was promoted and appellant along with the other was ignored. Law is equal for all therefore on the principle of consistency appellant will have to be

promoted on the same date alongwith Mr. Ghaffar. It is also pertinent to mention here that appellant has now been promoted vide notification dated 15/03/2023 but with immediate effect, however he was eligible for such promotion on 22/02/2022 as he was wrongly deferred at that time.

8. For what has been discussed above, the appeal in hand is accepted as prayed for. Costs shall follow the event. Consign.

9. *Pronounced in open court at Swat and given under our hands and seal of the Tribunal on this 2nd day of January, 2024.*



(SALAH UD DIN)
Member (J)
Camp Court, Swat



(RASHIDA BANO)
Member (J)
Camp Court, Swat


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*Kaleemullah

05.12.2023

1. Learned counsel for the appellant present. Mr. Habib Anwar, Additional Advocate General alongwith Mr. Hussain Ali, Litigation Officer for the respondents present.
2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 02.01.2024 before D.B at camp court Swat. P.P given to the parties.

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(Muhammad Akbar Khan)
Member (E)
Camp Court Swat


(Rashida Bano)
Member (J)
Camp Court Swat

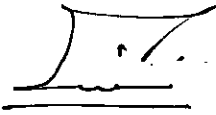
kamranullah


ORDER

02.01.2024

1. Learned counsel for the appellant present. Mr. Inayat Ullah Khan learned Assistant Advocate General alongwith Mr. Hussain Ali, ADEO for the respondents present.
2. Vide our detailed judgement of today placed on file, the appeal in hand is accepted as prayed for. Costs shall follow the event. Consign.
3. *Pronounced in open court at Swat and given under our hands and seal of the Tribunal on this 2nd day of January, 2024.*

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(SALAH UD DIN)
Member (J)
Camp Court, Swat


(RASHIDA BANO)
Member (J)
Camp Court, Swat

*Kaleemullah

05.10.2023

Appellant alongwith his counsel present. Mr. Hussain Ali, ADEO alongwith Mr. Muhammad Jan, District Attorney for the respondents presents.

Minutes of DPC meeting dated 01.09.2021 as well as concerned working paper have been submitted through office, which are available on the record. Learned counsel for the appellant requested that as he has not gone through the said documents, therefore, an adjournment may be granted. Adjourned. To come up for arguments on 07.11.2023 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

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(Rashida Bano)
Member (J)
Camp Court Swat



(Salah-ud-Din)
Member (J)
Camp Court Swat

Naeem Amin

07.11.2023

Clerk of learned counsel for the appellant present. Mr. Hussain Ali, ADEO alongwith 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 not available today. Adjourned. To come up for arguments on 05.12.2023 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

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(Fareeha Paul)
Member (E)
Camp Court Swat



(Salah-ud-Din)
Member (J)
Camp Court Swat

Naeem Amin

9th June, 2023

1. Appellant in person present. Clerk Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

2. Lawyers are on strike, therefore, case is adjourned. To come up for arguments on 07.07.2023 before D.B at Camp Court, Swat. P.P given to the parties.

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(Muhammad Akbar Khan)
Member (E)

(Kalim Arshad Khan)
Chairman
Camp Court, Swat

Mutazem Shah

07.07.2023

Appellant in person present. Mr. Bakht Adnan, Litigation Officer alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

At the very outset, learned District Attorney pointed out that the minutes of DPC meeting held on 01.09.2021 as well as concerned working paper is not available on the record. The availability of the afore-mentioned document before the Tribunal is necessary for just and right decision of the appeal in hand, therefore, representative of the respondents shall positively submit the same on the next date and to come up for arguments on 05.10.2023 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

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(Fareeha Paul)
Member (E)
Camp Court Swat

(Salah-ud-Din)
Member (J)
Camp Court Swat

Naeem Amin

05th April, 2023

1. Appellant in person present. Mr. Fazal Shah Mohmand, Additional Advocate General alongwith Mr. Hussain Ali, ADEO for the respondents present.

2. Appellant seeks adjournment on the ground that his counsel is not available today. To come up for arguments on 04.05.2023 before the D.B at Camp Court Swat. Parcha Peshi is given to the parties.



(Salah-ud-Din)
Member (J)
Camp Court Swat



(Kalim Arshad Khan)
Chairman
Camp Court Swat

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04.05.2023

Appellant in person present.

Muhammad Jan, learned District Attorney for respondents present.

Former made a request for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 09.06.2023 before D.B at Camp Court, Swat. Parcha Peshi given to the parties.

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(Fareeha Paul)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat

Mutazem Shah

09.02.2023

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Hussain Ali, ADEO for the respondents present.

Representative of the respondents stated at the Bar they have received the notice on 08.02.2023 and requested for time to submit reply/comments. Request is allowed. To come up for reply/comments on 07.03.2023 before S.B at camp court Swat.

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(Muhammad Akbar Khan)
Member (E)
Camp Court Swat

07th Mar. 2023

Appellant present in person. Mr. Uzair Azam Khan, Additional Advocate General alongwith Mr. Hussain Ali, ADEO for the respondents present.

Reply/comments on behalf of the respondents submitted which is placed on file and a copy whereof handed over to appellant. To come up for rejoinder, if any, and arguments on 05.04.2023 before the D.B at camp court, Swat. Parcha Peshi given to the parties.

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(Farecha Paul)
Member(E)
(Camp Court, Swat)

06.12.2022

Tour is hereby cancelled, therefore, the case is adjourned to 03.01.2023 for the same as before.


Reader

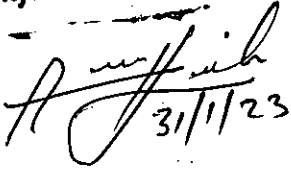
03.01.2023

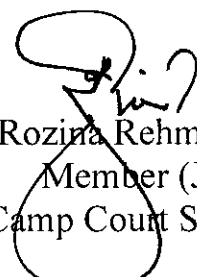
Counsel for the appellant present.

Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 09.02.2023 before S.B at camp court Swat.

Rs-100/-
Appellant Deposited
Security & Process Fee


31/1/23

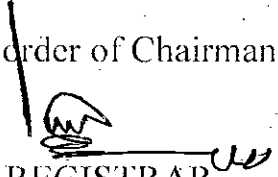
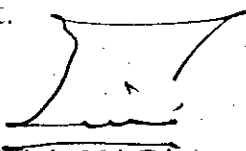

(Rozina Rehman)
Member (J)
(Camp Court Swat)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1504/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/10/2022	<p>The appeal of Mr. Hazrat Said resubmitted today by Mr. Ahmad Hussain Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on <u>08.11.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>
08.11.2022		<p>Appellant in person present and requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for preliminary hearing on 06.12.2022 before the S.B at Camp Court Swat.</p> <p> (Salah-Ud-Din) Member (J) Camp Court Swat</p>

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The appeal of Mr. Hazrat Said son of Khurshid Room Cheel Shagai Saidu Sharif Swat received today i.e. on 12.10.2022 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-B & E of the appeal are illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be attested.

No. 2804 /S.T,

Dt. 12-10 /2022



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ahmad Hussain Adv.
High Court Swat.

R Sri
objection removed and the same is
re-filed today

Ahmad Hussain

Attc
19-10-22

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECKLIST

Case Title: Hazrat Said SST-2 Education department Swat

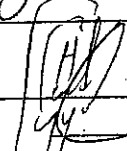
Sl No	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?		
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?		
15	Whether numbers of referred cases given are correct?		
16	Whether appeal contains cutting/overwriting?		
17	Whether list of books has been provided at the end of the appeal?		
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	✓	
26	Whether copies of comments/reply/rejoinder submitted? On		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Hazrat Said

Signature:



Dated:

12/10/2022

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA, PESHAWAR.

SCANNED
KPST
Peshawar

Service Appeal No 1504 of 2022.

Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil; Babozai,
District swat.Appellant

Versus

Government of KPK through Director E&S Education KPK and others

.....Respondents

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7.	Copy of Appeal dated; 9/11/2021	C	17
	Copy of appeal is annexure along with order sheet dated 6-10-2022	D	18-20A
9.	copy of notification dated 22/02/2022	E	21-23
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Appellant
Through


Ahmad Hussain
Advocate High court.

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA, PESHAWAR.

Service Appeal No 1504 of 2022.

Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil Babozai,
District swat.Appellant

Versus

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1576

Dated 12-10-2022

- 1) Secretary Education Khyber Pakhtun Khwa at Peshawar
- 2) Director E&S Education Khyber Pakhtun Khwa " Chairman Departmental Promotion Committee, at Peshawar.
- 3) District Education Officer "Male District Swat.

.....Respondents

Appeal under Section 4 of Service Tribunal Act read with any other relevant provisions, against no action taken on the departmental appeal Date; 22/06/2022 within the statutory period of 90 days.

PRAYER:

Filed to-day On acceptance of this appeal the respondent No 2 may kindly be directed to promote the appellant from C T BPS 15 TO SST (Maths, phy) from the date of issuance of notification Dated 22/02/2022.
Registrar
12/10/22

Respectfully Sheweth:

The appellant submits as under;

Re-submitted to -day and filed.

Registrar

19/10/22

- 1) That the appellant is currently serving the Education Department as CT (BPS 15) in GHS Saidu Sharif Swat. He was promoted to CT on 29/07/2016. (Copy Promotion letter Dated 29/07/2016 is annexure A).
- 2) That the appellant has completed five years service as CT and being eligible/ fit, he has been waiting for promotion to SST (Mat physics) for long.
- 3) That on 29/10 2021 the respondent No 2 vide notification Dated 29/10/2021 promoted several teachers from various

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cadres i.e. CT, SCT, AT, SAT etc to SST BPS16. **(Copy of notification Dated 29/10/2021 is annexure B).**

- 4) That only those teachers who were fit /eligible for promotion to SST II (Maths physics) were neglected and excluded from the notification Dated 29/10/2021.
- 5) That all the teachers belonging to the said category including the appellant were deeply disappointed by this act of the respondent No 2.
- 6) That the appellant raised the issue before the respondent No 2 and requested his promotion to SST (Maths phy) BPS 16 from the date of issuance of notification Date 29/10/2021 but the respondent No 2 did not give any satisfactory answer.
- 7) That the appellant then preferred/filed a departmental appeal dated: 9/11 /2021 before the respondent No 2 and once again requested him for his promotion to the said post. **(Copy of Appeal dated; 9/11/2021 is annexure C).**
- 8) That the departmental appeal Dated 9/11/2021 but the respondent No 2 badly failed to take any action on it within the statutory period of 90 days. Being aggrieved from the action and inaction of the respondent No 2 the appellant preferred a service appeal No 936/22 Dated: 22-06-2022 appeal which is still pending adjudication before this honorable court and has been fixed for 10-11-2022. **(Copy of appeal is annexure D).**
- 9) That in meanwhile the petitioner came to know that the respondent no 2 promoted few more teachers except the appellant and three others to SST(Maths, Phy) BPS 16 vide notification Dated; 22/02/2022 (**copy of notification dated 22/02/2022 is annexure E).**
- 10) That despite having the required qualification and experience and being eligible for promotion, the appellant was once more discriminated by not considering him for promotion to SST(Maths, Phy).
- 11) That hence the appellant having no other adequate remedy filed a departmental appeal dated; 22/06/2022 but the respondent No 2 once again did not take any action on it within the statutory period of 90 days. **(copy of departmental appeal dated;22/06/2022 is annexure F).**
- 12) That being morally and legally aggrieved from the action and inaction of the respondent No 2 the appellant has no other

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remedy but to prefer the instant appeal under Section 4 of Service Tribunal Act read with any other relevant provisions, before this honorable court inter alia the following grounds.

GROUND:

- i) That the appellant is serving as CT BPS 15 since 29/07/2016. He has completed his five year required service and is eligible/fit for promotion to SST II (Maths, Phys).
- ii) That the appellant also has the required academic qualification. He has a BSc degree from virtual University, additional physics from virtual university and a degree of B.Ed from University of Malakand **(Copies of the academic documents are annexure G, H, and I while copies of relevant notifications J and K).**
- iii) That few other teacher who have same academic qualification as that of the applicant have already been promoted to SST BPS16. **(Copies of relevant notifications are annexure L and M).**
- iv) **That** the impugned action of respondent No 1 is against the law, facts, material available on record. Hence liable to be rectified.
- v) **That** the article 4 of the constitution of Islamic Republic of Pakistan 1973, has clearly unequivocally stated that every individual is to be dealt in accordance with law, but the respondents not only violated this principle but also violated article 25 of the Constitution of Islamic Republic of Pakistan which guarantees equality.
- vi) **That** the appellant is well qualified and full fulfills the required qualification as well as criteria for promotion to SST II (Maths physics)
- vii) **That** the appellant has not been treated in accordance with law and rules on the subject noted above and such the respondent violated Article 4 and 25 of constitution of Pakistan 1973

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- viii) **That** the impugned action of the respondents is nothing else, but a clear violation of Khyber Pakhtunkhwa Efficiency and Discipline Rules 1973, (Amended in 2011) and other relevant .
- ix) **That** the impugned action of respondents is whimsical, capricious and founded on surmises and conjectures.
- x) **That** other grounds not specifically raised will be argued with the prior permission of this Honorable Court at the time of arguments.

Prayers;

On acceptance of this appeal the respondent No 2 may kindly be directed to promote the appellant from C T BPS 15 TO SST (Maths, phy) from the date of issuance of notification Dated 22/02/2022.

Any other relief not specifically prayed for but this august court deem proper may also be granted.


Appellant
Through

Ahmad Hussain
Advocate High court.


Harrat Said

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA, PESHAWAR.

Service Appeal No of 2022.

Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil; Babozai,
District swat.Appellant

Versus

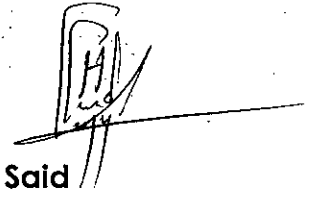
Government of KPK through Director E&S Education KPK and others

..... Respondents

AFFIDAVIT

I, **Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil; Babozai, District swat**, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

DEPONENT



Hazrat Said
In person


Muhammad Arshad Iqbal
Advocate
Oath Commissioner

12-10-2022

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN
KHWA, PESHAWAR.

Service Appeal No of 2022.

Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil; Babozai,
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Versus

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.....Respondents

ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

SHazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil Babozai,
District swat.

CNIC: 15602-3154422-9

Cell: 0333-9463542

ADDRESSES OF THE RESPONDENTS

1. Secretary Education Khyber Pakhtun Khwa at Peshawar
2. Director E&S Education Khyber Pakhtun Khwa at Peshawar.
3. District Education Officer "Male" Chairman Departmental Promotion Committee District Swat.

APPELLANT


Hazrat Said

Annexure A (7)



SWAT EDUCATION DEPARTMENT

Department of Elementary & Secondary Education, Swat.
Govt. of Khyber Pakhtunkhwa.

-Tel: 0946-9240209 - 9240228
Web: www.sed.edu.pk
Online Portal: www.swateducation.com
Email: swateducation@gmail.com

Office of The District Education Officer Swat

OFFICE ORDER:

Consequent upon the recommendation of the District Selection/Promotion Committee District Swat in its meeting held on 28.07.2018 and in pursuance of Notification No SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre Dated 13/11/2012 issued by the Govt. Of KPK (E&SE) Deptt: Peshawar and Notification No SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre Dated 24/04/2013 issued by the Govt Of KPK (E&SE) Deptt: Peshawar, the following PSHTs/SPSTs (Male) are hereby promoted to CT BPS-15 @ (Rs.13510-1120-47110) plus usual allowances as admissible to them under the rules in the schools noted against their names in the interest of public service with immediate effect.

S#	S.L.No	Name	Father Name	Name of GPS Where working	Proposed School	Remarks
1	773	Yousaf Khan	Azamo Khan	GPS Charbagh No.2	GMS Alamganj	A.V.P
2	840	Gul Muhammad	Gul Dad Khan	GPS Baidara # 1	GHSS Baidara	A.V.P
3	1008	Roshan hilal	Namroz	GPS Tang Banr Q	GHS Qalagay	A.V.P
4	1060	Muhamamd Tawab	Said Rahman	GPS Kuz Gishar	GCMHS Wadoodia	A.V.P
5	1068	Javed	Munir Khan	GPS Gogdara	GHS Ghalegay	A.V.P
6	1201	Abdul Jahbar	Abdul Ghaffar	GPS Rahim Abad B.2	GHS Amankot	A.V.P
7	1234	Hasan Ali	Taj Malook	GPS TindoDag	GHS Barikot	A.V.P
8	1236	Raza Khan	Taj Muhammad Khan	GPS Shamoza	GHS Khazana	A.V.P
9	1322	Fazal Rahim	Hazrat Alimad	GPS Tahir Abad	GHS No.1 Mingora	A.V.P
10	1357	Nadar Khan	Sadar	GPS Chinda Khwara	GHS Sirsinai	A.V.P
11	1452	Inayatullah	Shah Dawran	GPS Dakorak	GHSS K.Khela	A.V.P
12	1509	Anwar Shah	Fazal Karim	GPS Mingora No.3	GHS No.3 Mingora	A.V.P
13	1513	Muhammad Sahib Zada	Gul Zada	GPS Gulkada	Mingora No.4	A.V.P
14	1607	Alam Sher	Zarbaz Khan	GPS Sar Khazana #1	GHS Qalagay	A.V.P
15	1611	Akbar Hussain	Umer Said	GPS Loai Bunn	GHSS Kokarai	A.V.P
16	1613	Muhammad Murad	Muhammad Shoaib	GPS Parrai	GHS Parrai	A.V.P
17	1614	Sher	Abdur Rashed	GPS Malooch #2	GHS Sirsinai	A.V.P
18	1618	Muhammad Afzal	Sher zada	GPS Tang Banr Q	GHS Dardyal	A.V.P
19	1619	Muhammad Akam	Muhammad hashim	GPS Sory Sharifai No:02	GHS Totano Bundai	A.V.P
20	1620	Umer Sher	Khalid	GPS Kokarai	GMS Panr	A.V.P
21	1623	Said Ali Khan	Mohd Khaliq	GPS Banjot No.2	GHS Banjot	A.V.P
22	1625	Muhammad Saleem	Ibrahimi Khan	GPS Shalpin	GHS Shalpin	A.V.P
23	1627	Bahadar Ali Khan	Alam zeb Khan	GPS Gwalerai	GHS Beha	A.V.P
24	1628	Aman Ullah Khan	Sher Alam Khan	GPS Mangultan	GHS Toha	A.V.P
25	1634	Hazrat said	Khurshed Rome	GPS Shagai	GMS Guligram	A.V.P
26	1639	Muht Feroz	Muht Karim	GPS Amlook Bagh	GHS Barikot	A.V.P
27	1640	Asim Khan	koki	GPS Ghakhi Banda	GM S Ghaki Banda	A.V.P
28	1641	Muhammad Ayub Khan	Fateh Muhammad Khan	GPS Mingora No.1	GHS Mingora No.1	A.V.P

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S#	S.L.No	Name	Father Name	Name of GPS Where working	Proposed School	Remarks
29	1645	Muhammad Ghafoor Khan	Muhammad Khan	GPS Naukhara	GHS Sakhra	A.V.P
30	1648	Ahmad Ali	Aurang Zeb	GPS Rahim Abad	GHS Amankot	A.V.P
31	1653	Jehan Parwar	Muhammad Khan	GPS Jehan Abad	GHS Seer	A.V.P
32	1659	Muhammad Rasool	Mohdi Gul	GPS Mangar kot	GHS Manglawar	A.V.P
33	1663	Fazlullah	Anwarul Mulk	GPS Fazal abad (B)	GHS Aboha	A.V.P
34	1669	Atiq ur Rahman	Abdur Rahman	GPS Ali Grama	GMS Aligrāma	A.V.P
35	1673	Fazal Ilahi	Muhammad Khalig	GPS Totano Bandai	GHS Totano Bandai	A.V.P
36	1674	Abdul Jabar	Fazal Hanan	GPS Hazara	GHSS Kabal	A.V.P
37	1676	Akbar Ali	Sarbiland	GPS Kokarai	GMS Dangram	A.V.P
38	1678	Liaqat Ali	Momin Khan	GPS Manglawar No.2	GHS Manglawar	A.V.P
39	1679	Hussain Shah	Muhammad Kamal	GPS Mashkomai	GHS Chamtalai	A.V.P
40	1683	Ihsan ul Haq	Shamsul Hadi	GPS Parona	GHSS Mingora	A.V.P
41	1687	Zakir Hussain	Amir Sahib	GPS Deran Patay	GHS Beha	A.V.P
42	1691	Fazal Ghafoor	Abdul Qayum	GPS Mingora No.2	GHSS Mingora	A.V.P
43	1692	Jehan Sher	Muhammad Zeb	GPS Pir Kalay	GHS Nazar Abad	A.V.P
44	1695	Syed Fazal Akbar Mian	Moambar Mian	GPS Shagai	GHSS Madayan	A.V.P
45	1696	Misbahuddin	Mirajuddin	GPS Damana	GMS Damana	A.V.P
46	1697	Muhammad Iqbal	Mian Gul Badshah	GPS Madyan	GHSS Madayan	A.V.P
47	1703	Muht: Zahid Khan	Muht: Pervaiz Khan	GPS Titabat	GHS Asala	A.V.P
48	1709	Ahmad Jee	Namir Khan	GPS Utroor	GHSS Utroor	A.V.P
49	1711	Ali Akbar Mian	Sadbar Mian	GPS Shagai	GMS Pardesha	A.V.P
50	1716	Raham Karam	Main Mustafa	GPS Karakar	GHSS Madayan	A.V.P
51	1718	Sher Mohd Khan	Sher Afzal Khan	GPS Hazara	GMS Aligrāma	A.V.P
52	1722	Said Salahuddin	Moinuddin	GPS Madyan	GHSS Madayan	A.V.P
53	1727	Karim Dad	Wahid zaman	GPS Maira	GHS Bara Samai	A.V.P
54	1729	Salah d d n	Mian Gul Jalal	GPS Damana	GHS Qandil	A.V.P
55	1744	Muhammad Naeem khan	Fazal Muhammad	GPS Goratai-No.2	GHS Aboha	A.V.P
56	1762	Niaz Ali	Abdur Rashed	GPS Ali Grama	GMS Dagai	A.V.P
57	1779	Khan Muhammad	Sazan	GPS Chatoria	GHS Gat Shawar	A.V.P
58	1804	Raham Ali	Fazal Wahid	GPS Roringar	GHS Roringar	A.V.P
59	1805	Muhammad Ghafoor Khan	Abdul Hamid	GPS Rahim Abad B.2	GHS Ingaro Dherai	A.V.P
60	1813	Karim Ullah	Aziz Ullah	GPS Kokarai	GMS Dangram	A.V.P
61	1821	Rahmat Ali	Muhammad Qurish	GPS Jat Kot	GMS Segran	A.V.P
62	1824	Sharafat Ali	Pervaz Khan	GPS Garai Chuprial	GHS Chuprial	A.V.P
63	1834	Fazal Rahman	Aziz ur Rahman	GPS Qambar No.1	GHS No.3. Mingora	A.V.P
64	1847	Qarebullah	Toota	GPS Ningolai	GHS Ningolai	A.V.P
65	1860	Rahmat Zada	Gul Zada	GPS Ado	GHS Toha	A.V.P
66	1861	Amjad Ali	Ghulam Rahim	GPS Balogram	GMS Najigram	A.V.P
67	1892	Usman Ali	Muhammad Faroosh	GPS Qambar No.2	GHS Qambar	A.V.P
68	1894	Muhammad Iqbal	Mian Said Rahman	GPS Qambar No.1	No.4 Mingora	A.V.P
69	1897	Aziz Ahmad	Abdur Rashed	GPS Takhta Band	GHS Ingaro Dherai	A.V.P
70	1898	Muhammad Arif Jan	Sherin Zada	GPS Takhta Band	GHS Manyar	A.V.P
71	1899	Akbar Ayub	Shamsul Huda	GPS Madyan	GMS Pardesha	A.V.P
72	1907	Umar Farooq	Chari	GPS Ado Toha	GHS Manglawar	A.V.P

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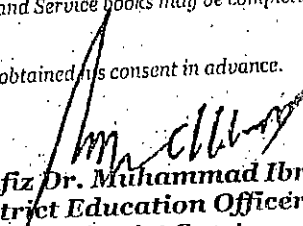
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S#	S.L.No	Name	Father Name	Name of GPS Where working	Proposed School	Remarks
73	1916	Sana ur Rahman	Habib ur Rahman	GPS Kokarai	GHSS Kokarai	A.V.P
74	1928	Muhammad Jamal	Faridon	GPS Panjigram	GHS Manyar	A.V.P
75	1930	Rahim Ullah	Abdur Rashid	GPS Jambil	GMS Mairagai	A.V.P

TERMS AND CONDITIONS:

1. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
2. Their services shall be terminated at any time, in case their performance is found unsatisfactory. In case of misconduct, they shall be preceded under the rules framed from time to time.
3. NO TA/DA will be paid to them on joining the post.
4. Charge reports should be submitted to all concerned.
5. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
6. This order is issued, errors and omissions accepted, as a notice only.
7. 60 % candidates have been promoted from amongst the eligible PSHTs/SPSTs.
8. They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if some one is found wrongly promoted he will be reversed.
9. SDEOs (male) Swat is directed to relieve them off immediately and LPCs and Service books may be completed and handed over to them.
10. No refusal will be allowed as each and every one has been contacted and obtained his consent in advance.

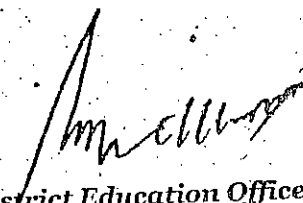

(Hafiz Dr. Muhammad Ibrahim)
District Education Officer (M)
District Swat

Dated: 29/07/2016.

Endst. No. 2561-66

Copy of the above is forwarded to:

1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
2. The District Accounts Officer Swat.
3. The Principals / Headmaster of the institute concernd.
4. SDEO(M) Swat.
5. The Officails concerned.
6. PA to DEO (M) Swat.


District Education Officer (M)
District Swat

CTC
Jawid



Annexure "B" (10)
Promotion of SST of District Swat
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

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

A. SST (General)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
40% CT/SCT Promotion quota to SST(G)	18.13
Proposed CT/SCT for Promotion to SST(G)	11
Deferred CT/SCT for Promotion to SST(G)	5

S.No	Sen#	Name of official/	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	48	Muhammad Nisar Khan	GHSS Labat	16-04-75	20/12/2000	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	49	Muhammad Iftikhar	GHS Seer	13-04-68	25/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	50	Fazal Hadi	GHS: Chitor	15-04-72	05/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	52	Nisar Khan	GHS: Shalhand	03-04-70	25/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	54	Muhammad Ayub	GHSS Mingora	01-02-67	25/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	56	Shaukat Ali	GCMHS: Wadoodia	11-04-69	25/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.



Promotion of SST of District Swat

7.	58	Farooq Ali Shah	GHSS: Deolai	01-12-70	25/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	59	Muhammad Perviz	GHSS: Madyan	20-05-63	25/05/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
9.	60	Abdul Munim	GHSS: Sijbar	15-08-65	01/06/1996	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
10.	64	Muhammad Ghafoor	GHSS: Mingora	04-02-71	24/06/1997	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
11.	65	Muhammad Younas	GHSS Kalam	14-04-73	25/06/1997	BA/MA/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PST/SPST/PSHT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
20% PST/SPST/PSHT to SST(G)	9
Proposed PST/SPST/PSHT for Promotion to SST(G)	8
Deferred PST/SPST/PSHT for Promotion to SST(G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	102	Jehan Bacha	GPS Qila Qalagay	15/03/1964	31/12/1987	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	198	Ismail	GPS Giray dad	15/01/1968	05/03/1988	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
3.	211	Tahir Ali	GPS Peochar	15/06/1970	05/03/1990	BA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swat

4.	213	Qareeb ur Rahman	GPS Shakardara	01/01/1967	05/03/1990	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	216	Laiq Sohrab	GPS Shaloon	01/06/1963	05/03/1990	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	217	Jahan Abad Khan	GPS Radokrai	17/03/1970	05/03/1990	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
7.	218	Syed Akhtar Shah	GPS Awisha	10/03/1967	05/03/1990	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	224	Abdul Kabir	GPS Shegal	01/02/1967	05/03/1990	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.3:- PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% DM/SDM Promotion quota to SST(G)	1.81
Proposed DM/SDM for Promotion to SST(G)	2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	DPC REMARKS RECOMMENDATION
1.	9	Hazrat Umar	GHSS Khwaza Khela	01/06/1969	22/04/1992	MA/DM/ B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	11	Muhammad Sher	GHS Bara Samai	25/01/1968	22/04/1992	MA/DM/ B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swat

ITEM NO.4:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% AT/SAT Promotion quota to SST(G)	2
Proposed AT/SAT for Promotion to SST(G)	1
Deferred AT/SAT for Promotion to SST(G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	34	Muhammad Ghani	GHS KasShingrai	12-05-1972	30/10/1994	MA Islamiyat M.Ed Shahadul Alamia	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.5:- PROMOTION OF TT/STT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% TT/STT Promotion quota to SST(G)	2
Proposed TT/STT for Promotion to SST(G)	2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	49	Attaullah STT	GHS Sirsinai	29-01-1978	26-03-2005	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	52	Muhammad Farooq STT	GHS No 1 Mingora	03-01-1975	26-03-2005	MA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.6:- PROMOTION OF Qari/S Qari To SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
3% Qari/Sr.Qari Promotion quota to SST(G)	1.36
Proposed Qari/Sr.Q for Promotion to SST(G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular Qari	Academic & Professional Qualification	Remarks
1.	31	Anwar Ullah	GHS Nawakaly (B)	01-02-1968	24-6-1997	BA/B.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swat

B. SST (Bio/Chem)**ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS**

Total No. of Vacant Post of SST(Bio/Chem)	17
25% Initial Recruitment Quota	04.25
75% by Promotion Quota	12.75
40% CT/SCT Promotion quota to SST(Bio/Chem)	6.8
Proposed CT/SCT for Promotion to SST(Bio/Chem)	5
Deferred CT/SCT for Promotion to SST(Bio/Chem)	2

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	676	Irfan Khan	GHS Shalpin	20-12-87	17-03-16	B.SC/CT/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
2.	677	Nacemullah	GHSS Batai Kh.Khiela	20-04-88	17-03-16	B.SC/CT/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
3.	679	Fawad Ahmad	GHS Qalagay	03-06-88	17-03-16	B.SC/CT/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
4.	683	Amir Bahadar Khan	GCMHSS Waddodia	26-05-90	17-03-16	B.SC/CT/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
5.	684	Salman	GHS Chungai	10-05-87	17-03-16	B.SC/CT/ B.ED	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PST/SPST/PSHT to SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	17
25% Initial Recruitment Quota	04
75% by Promotion Quota	13
20% PST/SPST/PSHT to SST(Bio/Chem)	03
Proposed PST/SPST/PSHT for Promotion to SST(Bio/Chem)	1
Deferred PST/SPST/PSHT for Promotion to SST(Bio/Chem)	2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	1500	Inamullah	GPS Matta	04/02/1985	02/09/2009	B.Sc Bio/Chem/ M.Ed	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

ITEM NO3:- PROMOTION OF SDM/DM MALE TO THE POST OF SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No of vacant Posts of SST(Bio/Chem)	17
Initial recruitment Quota	04
75% Promotion Quota	13
4% SDM/ DM Promotion Quota to SST(Bio/Chem).	0.68
Proposed SDM/DM for promotion SST(Bio/Chem)	01

S.#	S.No	Name of candidate	Name of School	D/O Birth	D/O Apptt as regular DM	Academic & Professional Qualification	DPC REMARKS RECOMMENDATION
1.	148	Mushtaq Ahmad	GHSS Sakhra	12-11-1990	17-03-2016	M.Sc Botnay	Services are placed at the disposal of DEO (M) Swat for adjustment against the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

Terms and Conditions:-

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

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 5139-45/ File No.5/Promotion of SST (BPS-16) Dated Peshawar the: 29/10/2021

Copy forwarded for information and necessary action to the: -

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

Deputy Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

SST (Maths/Phy)

(16)

Promotion of SST of District Peshawar

ITEM NO.1 PROMOTION OF CT/SCT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No of Vacant Posts of SST (Maths/Phy)	10
25% Initial Recruitment Quota	2.5
75% Promotion Quota	7.5
40% CT/SCT Promotion Quota to SST (Maths/Phy)	4
Proposed CT/SCT for Promotion to SST (Maths/Phy)	4

SNo	S.L. No.	Name of Official	Father Name	Present Place of Posting	Date of Birth	Date of Apptt as Regular CT/SCT	Qualif:	Remarks
1	272	Shah Nawaz Khan	Habib Ullah	GHS Urner Bala	12-10-1975	04-05-2009	BSC P/M MED	Services are placed at the disposal of DEO (M) Peshawar for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
2	103	Mukhtiar Ali	Sahar Gul	GSHSHISS No.1 Pesh City	05-08-1971	31-08-2017	BSC P/M B.ED	Services are placed at the disposal of DEO (M) Peshawar for adjustment against the post of SST (Maths/Phy) BPS-16 on Acting Charge basis with immediate effect.
3	184	Muhammad Nasir	Fazl-E-Karim	GSSHS Nothia Qadcem	30-12-1970	17-08-2017	BSC P/M B.ED	Services are placed at the disposal of DEO (M) Peshawar for adjustment against the post of SST (Maths/Phy) BPS-16 on Acting Charge basis with immediate effect.
4	221	Abdur Rahman	Mansoor Khan	GMS Lala Killi	03-07-1985	15-05-2014	BSC P/M B.ED	Services are placed at the disposal of DEO (M) Peshawar for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

ITEM NO.2 PROMOTION OF PST/SPST/PSHT to SST (Maths/Phy) BPS-16 ON REGULAR BASIS

Total No of Vacant Posts of SST (Maths/Phy)	10
25% Initial Recruitment Quota	2.5
75% Promotion Quota	7.5
20% PST/SPST/PSHT Promotion Quota to SST (Maths/Phy)	2
Proposed PST/SPST/PSHT for Promotion to SST (Maths/Phy)	2

S#	S.L. No.	Name of Official	Father Name	Present Place of Posting	Date of Birth	Date of Apptt as Regular PST	Qualif:	Remarks
4.	296	ZAHID	AMIN UL HAQ	GPS Shobala Telaband	01/09/1975	01/07/1997	M.SC CT/ B.Ed	Services are placed at the disposal of DEO (M) Peshawar for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.

16A

Promotion of SST of District Peshawar

309	Muhammad Riaz Khan	Shereen Jan	GPS Lakarai Kaneeza No.1.	03/03/1976	08/08/1997	M.SC CT/ B.Ed	Services are placed at the disposal of DEO (M) Peshawar for adjustment against the post of SST (Maths/Phy) BPS-16 on regular basis with immediate effect.
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Terms and Conditions:-

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

(Hafiz Dr. Muhammad Ibrahim)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 5119-25/ File No.5/Promotion of SST(BPS-16)Dated Peshawar the:29/10/2021

Copy forwarded for information and necessary action to the: -

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

Deputy Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Provincial Director,
Elementary and Secondary Education
Khyber Pakhtunkhwa at Peshawar.

"Annexure"
"C" (17)

Department
Peshawar

Through proper channel

Subject: Appeal to resolve the defer case for SST -II

Respected Sir,

It is humbly stated that I have applied for the post of SST-II via District Education Officer (M) Swat but my case has been deferred by the honorable Director.

Dear Sir, kindly allow me to fulfill the deficiency if any I have because I Don't know the reasons yet. I Have Passed my B.Sc from virtual University of Pakistan and after that I Passed Physics in additional form the said University (Transcript and DMC of Physics attached). In this way I am Fully Eligible for the said post.

Kindly re-address my deferred case and obliged.

Yours' s Obediently

Hazrat Said CT B-15
GHSS Shagai Saidu Sharif
District Swat.

Forwarded To The D.E.O. (M) Swat
for further n/a please

8/11/2021
PRINCIPAL
Govt. Higher Secondary School
Shagai, Saidu Sharif Swat

CJC
Said

Forwarded to Director
E/S, E/O, Peshawar for
further n/a as per policy

6-11-2021
Principal
Govt. Higher Secondary School
Shagai, Saidu Sharif Swat

1413
9-11-2021

Annexure "D" (18)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA, PESHAWAR.

Handwritten initials or mark.

Service Appeal No. **936** of 2022.

Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil; Babozai, District Swat.

.....Appellant

Versus

- 1) Secretary Education Khyber Pakhtun Khwa at Peshawar
- 2) Director E&S Education Khyber Pakhtun Khwa " Chairman Departmental Promotion Committee, at Peshawar.
- 3) District Education Officer "Male District Swat.

.....Respondents

Appeal under Section 4 of Service Tribunal Act read with any other relevant provisions, against no action taken on the departmental appeal Date; 9/11/2021 within the statutory period of 90 days.

PRAYER:

On acceptance of this appeal the respondent No 2 may kindly be directed to promote the appellant from C T BPS 15 TO SST (Maths, phy) from the date of issuance of notification Dated 29/10/2021.

Respectfully Sheweth:

The appellant submits as under;

- 1) That the appellant is currently serving the Education Department as CT (BPS 15) in GHS Saidu Sharif Swat. He was promoted to CT on 29/07/2016 (Promotion letter Dated 29/07/2016 is annexure A)
- 2) That the appellant has completed five years service as CT and being eligible/ fit, he has been waiting for promotion to SST (Mat physics) for long.
- 3) That on 29/10 2021 the respondent No 2 vide notification Dated 29/10/2021 promoted several teachers from various cadres i.e. CT, SCT, AT, SAT etc to SST BPS16. (Copy of notification Dates 29/10/2021 is annexure B)

Attested by the Tribunal
Approved by the Tribunal
Attested by the Tribunal

- 4) That only those teachers who were fit /eligible for promotion to SST II (Maths physics) were neglected and excluded from the notification Dated 29/10/2021.
- 5) That all the teachers belonging to the said category including the appellant were deeply disappointed by this act of the respondent No 2.
- 6) That the appellant raised the issue before the respondent No 2 and requested his promotion to SST (Maths phy) BPS 16 from the date of issuance of notification Date 29/10/2021 but the respondent No 2 did not give any satisfactory answer.
- 7) That the appellant then preferred/filed a departmental appeal dated: 9/11 /2021 before the respondent No 2 and once again requested him for his promotion to the said post. **(Copy of Appeal dated; 9/11/2021 is annexure C)**
- 8) That the departmental appeal Dates 9/11/2021 is still pending and the respondent No 2 has badly failed to take any action on it within the statutory period of 90 days.
- 9) That being morally and legally aggrieved from the action and inaction of the respondent No 2 the appellant has no other remedy but to prefer the instant appeal under Section 4 of Service Tribunal Act read with any other relevant provisions, before this honorable court inter alia the following grounds.

GROUNDS;

- i) That the appellant is serving as CT BPS. 15 since 29/07/2016. He has completed his five year required service and is eligible/fit for promotion to SST.II (Maths, Phys).
- ii) That the appellant also has the required academic qualification. He has a BSc degree from virtual University, additional physics from virtual university and a degree of B.Ed from University of Malakand **(Copies of the academic documents are annexure D, E, and F while copies of relevant notifications H and I)**
- iii) That few other teacher who have same academic qualification as that of the applicant have already been promoted to SST BPS16. **(Copies of relevant notifications are annexure G and H)**

Attorney at Law
 Advocate
 Advocate

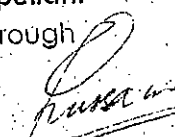
- iv) **That** the impugned action of respondent No. 1 is against the law, facts, material available on record. Hence liable to be rectified.
- v) **That** the article 4 of the constitution of Islamic Republic of Pakistan 1973, has clearly unequivocally stated that every individual is to be dealt in accordance with law, but the respondents not only violated this principle but also violated article 25 of the Constitution of Islamic Republic of Pakistan which guarantees equality.
- vi) **That** the appellant is well qualified and full fulfills the required qualification as well as criteria for promotion to SST II (Maths physics)
- vii) **That** the appellant has not been treated in accordance with law and rules on the subject noted above and such the respondent violated Article 4 and 25 of constitution of Pakistan 1973
- viii) **That** the impugned action of the respondents is nothing else, but a clear violation of Khyber Pakhtunkhwa Efficiency and Discipline Rules 1973, (Amended in 2011) and other relevant.
- ix) **That** the impugned action of respondents is whimsical, capricious and founded on surmises and conjectures.
- x) **That** other grounds not specifically raised will be argued with the prior permission of this Honorable Court at the time of arguments.


Prayers:

On acceptance of this appeal the respondent No 2 may kindly be directed to promote the appellant from C T BPS 15 TO SST (Maths, phy) from the date of issuance of notification Dated 29/10/2021.

Any other relief not specifically prayed for but this august court deem proper may also be granted.

Appellant
Through


Ahmad Hussain
Advocate High court.

Attested to be true Copy

Ahmad Hussain
Advocate High Court

20A



**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUN KHWA
PESHAWAR.**

Service Appeal No 936 of 2022.

Hazrat Said S/o Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil, Babozai, District Swat.

.....Appellant

Versus

- 1) Secretary Education Khyber Pakhtun Khwa at Peshawar
- 2) Director E&S Education Khyber Pakhtun Khwa " Chairman Departmental Promotion Committee, at Peshawar.
- 3) District Education Officer "Male District Swat.

.....Respondents

Appeal under Section 4 of Service Tribunal Act read with any other relevant provisions, against no action taken on the departmental appeal Date; 9/11/2021 within the statutory period of 90 days.

PRAYER:

On acceptance of this appeal the respondent No 2 may kindly be directed to promote the appellant from C T BPS 15 TO SST (Maths phv) from the date of issuance of notification dated 29/10/2021.

Respectfully Submitted

The Appellant/Suitors

By: [Signature]
BPS 15 to SST (Maths phv)
(Promotion Test) dated 29/10/2021

Certified to be true copy
[Signature]
E. S. JAINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

20A



06.09.2022

Nemo for the appellant. Vide previous order dated 13.07.2022, it was directed that notices be issued to appellant as well as his counsel for 02.08.2022, however the same were not issued; therefore, explanation in this respect be called from the Muharrar. On 02.08.2022, the appeal was fixed for today on strength of Reader Note, therefore, notices be issued to appellant as well as his counsel and to come up for preliminary hearing before the S.B on 06.10.2022 at Camp Court Swat.

(Salah-Ud-Din)
Member (J)
Camp Court Swat

06.10.2022

Appellant alongwith his counsel present. Learned counsel for the appellant sought time for preparation of preliminary arguments. Adjourned. To come up for preliminary hearing on 10.11.2022 before the S.B at Camp Court Swat.

(Signature)
Member (J)
Camp Court Swat

Date of Presentation of Application 12/10/22
 Number of Words 850
 Copying Fee 10/-
 Urgent —
 Total 10/-
 Name of Copyist —
 Date of Completion of Copy 18/10/22
 Date of Delivery of Copy 19/10/22

Certified to be true copy

MEMBER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Annexure "E"

Notification

(21)

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Substituted with Even No & date

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(B&A)/1-18/ESSE/2012 dated 11.7.2012 and Finance Department Endorsement No. SO(FR)/FD/19-22(F)/2010 dated 16.7.2012, the following CT/SCT, AT/SAT and PSHT/SPST/PST (Male) are promoted to the posts of SST(G), SST (Bio/Chem) and SST (Maths/Phy) in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A. SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
40% CT/SCT Promotion quota to SST(G)	18.13
Available for Promotion to SST(G)	18 (11-Already filled vide No.5139-45 dated 29/10/2021)
Proposed CT/SCT for Promotion to SST(G)	02
Deferred CT/SCT for Promotion to SST(G)	03

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointmt as Regular CT	Quali:	Remarks
1	47	Muhammad Afzal Khan	GHSS Mankiyal	01-01-70	24/01/1996	BA/MA B.ED	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST (G) in (BPS-16) on regular Basis with immediate effect.
2	62	Muhammad Salim	GHS: Kanju	18-05-69	14/09/1996	BA/MA B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST (G) in (BPS-16) on regular Basis with immediate effect.

ITEM NO.2:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% AT/SAT Promotion quota to SST(G)	1.81
Proposed AT/SAT for Promotion to SST(G)	02 (1-Already filled vide No.5139-45 dated 29/10/2021)
Available AT/SAT for Promotion to SST(G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appnt: as Regular AT	Quali:	Remarks
1	32	Amir zada	GHS laikot	5-3-1970	30-10-1994	BA, S.Alamia B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST (G) in (BPS-16) on regular Basis with immediate effect.

B. SST (Bio/Chem)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(Bio/Chem)	17
25% Initial Recruitment Quota	04.25
75% by Promotion Quota	12.75
40% CT/SCT Promotion quota to SST(Bio/Chem)	6.80
Available CT/SCT for Promotion to SST(Bio/Chem)	7 (5-Already filled vide No.5139-45 dated 29/10/2021)
Proposed CT/SCT for Promotion to SST(Bio/Chem)	2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appott: Regular CT	Quali:	Remarks
1	440	Shah Wadan	GHSS Dehrai	04-12-74	28/05/2016	B.SC. CT. M.ED	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST (Bio/Chem) in BPS-16 on regular Basis with immediate effect.

BEFORE THE DIRECTOR E&S EDUCATION KHYBER PAKHTUN KHWA
AT PESHAWAR.

Hazrat Said S/o. Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil; Babozai, District Swat.

.....Appellant

Departmental appeal against promotion order/ notification dated: 22/02/2022 vide which the appellant has been deferred from promotion to SST II (BPS 16).

Respectfully Sheweth:

The appellant submits as under:

- 1) That the appellant is currently serving the Education Department as CT (BPS 15) in GHS Saidu Sharif Swat. He was promoted to CT on 29/07/2016 (Promotion letter Dated 29/07/2016 is annexure A)
- 2) That the appellant has completed five years service as CT and being eligible/ fit, he has been waiting for promotion to SST (Mat physics) for long.
- 3) That on 29/10/2021 this esteemed office vide notification Dated 29/10/2021 promoted several teachers from various cadres i.e. CT, SCT, AT, SAT, etc to SST BPS16. (Copy of notification Dates 29/10/2021 is annexure B)
- 4) That only those teachers who were fit /eligible for promotion to SST II (Maths physics) were neglected and excluded from the notification Dated 29/10/2021:
- 5) That all the teachers belonging to the said category including the appellant were deeply disappointed by this act.
- 6) That the appellant raised the issue before the office and requested his promotion to SST. (Maths phy) BPS 16 from the date of issuance of notification Date 29/10/2021 but was not given any satisfactory answer.
- 7) That the appellant then preferred/filed a departmental appeal dated: 9/11/2021 and once again requested for his promotion to the said post. (Copy of Appeal dated; 9/11/2021 is annexure C)
- 8) That in meanwhile this esteemed office Promoted few more teachers except the appellant and three others to SST (Maths, phy) BPS 16 vide notification Dated; 22/02/2022. (Copy of notification dated; 22/02/2022 is annexure D)
- 9) That despite having the required qualification and experience and being eligible for promotion, the appellant was once more discriminated by not considering him for promotion to SST II.

1192
22-06/2022

Copy
Advocate High Court

10) That being morally and legally aggrieved the appellant has no other remedy but to prefer the instant departmental appeal, inter alia the following grounds.

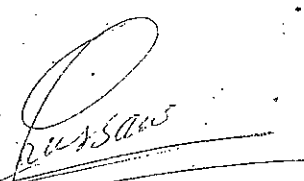
GROUNDS:

- i) That the appellant is serving as CT BPS 15 since 29/07/2016. He has completed his five year required service and is eligible/fit for promotion to SST II (Maths, Phys).
- ii) That the appellant also has the required academic qualification. He has a BSc degree from virtual University, additional physics from virtual university and a degree of B.Ed from University of Malakand **(Copies of the academic documents are annexure E, F, and G while copies of relevant notifications H and I)**
- iii) That few other teacher who have same academic qualification as that of the applicant have already been promoted to SST BPS16. **(Copies of relevant notifications are annexure I and J)**
- iv) That the impugned action of respondent No 1 is against the law, facts, material available on record. Hence liable to be rectified.
- v) That the article 4 of the constitution of Islamic Republic of Pakistan 1973, has clearly unequivocally stated that every individual is to be dealt in accordance with law, but in the instant case not only this principle but article 25 of the Constitution of Islamic Republic of Pakistan which guarantees equality has also been violated.
- vi) That the appellant is well qualified and full fulfills the required qualification as well as criteria for promotion to SST II (Maths physics)
- vii) That the appellant has not been treated in accordance with law and rules on the subject noted above.

Prayers;

On acceptance of this appeal the appellant may kindly be promoted from CT BPS 15 TO SST (Maths, phy) BPS16 from justified date.

Appellant
Through



Ahmad Hussain
Advocate High court.

Attested in my presence
Ahmad Hussain
Advocate High Court

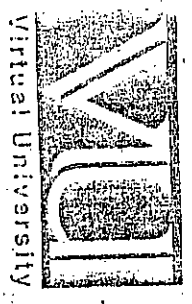
Annexure "C" (26)

Annexure "B" (17)

Serial No: 052851
Roll No: BC170200005

UNIVERSITY OF PUNJAB

Virtual



REGISTRATION

Regd No: 017-VU-001232

Upon the recommendation of

The Faculty of Management

confers upon

Harvart Sain

son of Shri Harvart Sain

the degree of

B. Sc. Mathematics, Statistics, Informatics (2 year program)

With all the rights, honors and privileges pertaining thereto

given this

15th day of July two thousand and nineteen

[Signature]

[Signature]
Vice-Chancellor
Virtual University of Punjab



10
G (27)

Serial No: A036599



Virtual University of Pakistan

TRANSCRIPT OF RECORD

B.Sc. Mathematics, Statistics, Economics (2 year program)

Student ID: BC170200805
 Name: Hazrat Said
 Father's Name: Khurshid Rouin
 D.O.B: March 12, 1976
 CNIC Number: 15602-3154422-9
 Registration No: 017-VU-001232
 Registration Date: March 21, 2017
 Result Notification No: VU-CEA/Reg/19/00003
 Result Notification Date: March 29, 2019
 Mode of Study: Regular

Semester	Code	Course Title	Cr. Hrs.	Grade	G.P.	Equiv. Marks	Remarks
Spring 2017	CS101	Introduction to Computing	3	B-	2.96	70.58	
	ECO406	Mathematical Economics	3	B+	3.33	75.97	
	ENG101	English Comprehension	3	B+	3.52	77.36	
	ISL201	Islamic Studies	1	B+	3.35	75.30	
	MTH101	Calculus And Analytical Geometry	3	B	3.32	74.90	
Fall 2017	PAK301	Pakistan Studies	2	A-	3.73	91.00	
	ECO302	Principles of Microeconomics	3	B	3.24	73.87	
	ENG201	Business and Technical English Writing	3	B+	3.35	75.12	
	MGT211	Introduction To Business	3	C	2.49	66.23	
	MTH201	Multivariable Calculus	3	B	3.01	71.22	
	STA301	Statistics and Probability	3	B	3.23	73.82	
Spring 2018	ECO303	Principles of Macroeconomics	3	B+	3.56	78.52	
	IT430	E-Commerce	2	B	3.15	72.87	
	MCA301	Communication skills	3	B	3.11	72.42	
	MTH303	Mathematical Methods	3	B	3.03	71.47	
	STA304	Applied Statistics	3	A-	3.85	82.99	
Fall 2018	STA406	Statistical Inference	2	B+	3.51	77.74	
	ECO501	Development Economics	3	B	3.10	73.18	
	MGT503	Principles of Management	3	D	1.84	57.11	
	MTH403	Calculus and Analytical Geometry - II	3	B-	2.81	69.39	
	STA404	Regression and Correlation Analysis	2	B+	3.38	75.03	
	STA408	Design and Analysis of Experiments	2	B	3.07	71.35	

CGPA: 3.15
 Overall Equiv. Marks: (1618.87 / 2200) 73.59%
 Credits Earned: 60
 Credits Transferred: 0
 Credits Exempted: 0
 Credits Required: 60
 All requirements completed

Signature
 Controller of Examinations

Muzed
 Signature
 Huzefa Said (Registrar)
 Virtual University of Pakistan

Annexure "H" (28)

(18)



Virtual University of Pakistan

M.A. Jinnah Campus, Dafeence Road, Off Rawalpindi Road, Lahore, Pakistan.
UAN: +92 (42) 111 880 880 Fax: +92 (42) 99200604 URL: www.vu.edu.pk

Office of The Controller of Examinations

No. VU/CE/21/01024
Dated: June 02, 2021

TO WHOM IT MAY CONCERN

This is to certify that HAZRAT SAID S/c KHURSHID ROOM bearing VU ID: PC190200250 was enrolled in the following Certificate Courses during Spring 2019 Semester.

Relevant information regarding his qualified course(s) are as under:

Course	Course Title	Cr. Hrs.	Grade	CGPA	Equi. Percentage
PHY101	Physics	3	B+		76.69
PHY301	Circuit Theory	3	B+	3.43	76.63

Registration Date: April 13, 2019

Result Notification Date: October 03, 2019

CGPA: 3.44

Percentage: 76.66

Total Credit Hours: 6

Prepared by:

Kaplan

Muneed

(Haiz Zareer Qadir)

Sr. Asst. Controller of Examinations

Muneed
Sr. Asst. Controller of Examinations
Office of the Controller of Examinations
Virtual University of Pakistan

28A

Virtual University of Pakistan



DETAILED MARKS CERTIFICATE

Professional Certificate Course(s)

Student ID: pc190200250
Student Name: HAZRAT SAID
Father's Name: KHURSHID ROOM

Registration Date: Apr 13, 2019
Result Declaration Date: Sep 27, 2019
Pass out Date: Oct 03, 2019

Course Code	Course Title	Cr. Hrs.	Grade	G.P.	Equiv. Marks	Remarks
PHY101	Physics	3	B+	3.44	76.69	
PHY301	Circuit Theory	3	B+	3.43	76.63	

CGPA: 3.44 out of 4.0
Overall Equiv. Marks: (153.32 / 200) 76.66%
Total Earned Credits: 6
Date of Issuance: July 27, 2022

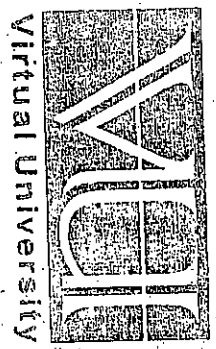
Controller of Examinations

Annexure "I" (29)

Serial No: A 015653

Roll No. PC390200250

Virtual University of Pakistan



This is to certify that

Muhammad Saad

son of Muhammad Raza

has qualified for the award of Professional Certificate in

PHYSICS - 101

Semester : Spring 2019

Credits : 3

Grade : B+

Attested

[Signature]

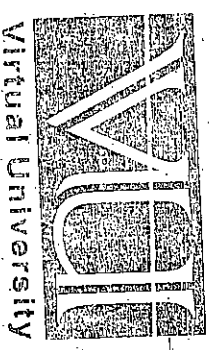
Examination

J 29

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J
30

Serial No: A 015054
Roll No: PC190200250

Virtual University of Pakistan



This is to certify that

General Said

son of Musharraf Roomi

has qualified for the award of Professional Certificate in

15112301 Circuit Theory

Semester: Spring 2019

Credits: 3

Grade: B+

Approved

Exam A

~~30~~
J 30

Serial No. 05

UNIVERSITY OF MALAKAND
PAKISTAN



Session 2008-2009

HAZRAT SAID Son of KHURSHID ROME Registration No. 2008713900 Private Candidate of District Swat
having passed the prescribed examination held in NOV-Dec, 2009 under Roll No. 1545 is admitted by the University of
Malakand to the degree of

Bachelor of Education

in First Division

The examination was taken as a whole.

[Signature]
Controller of Examinations

Countersigned
[Signature]
Vice-Chancellor

[Signature]
Fawad

Result Declared on 02-Apr-2010
Issuance Date 08-Sep-2021

1231

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Annexure "L" (32)

Promotion of SCTs/SDMs/SATs/STTs & PSIITs to SST-I ST



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWAT AT SAIDU SHARIF

PHONE/FAX 700686. E-Mail: female@edna.com www.female.scd.edu.pk

2014
in (female)
Account
Section
[Signature]

NOTIFICATION.

2014 Part (1)

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSo(PE) 4-5/SSRC/ Meeting/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs/SDMs/DMs/SATs/ATs/STTs/ TTs, Senior Qaries /Qarias, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST(Bio-Chem), SST (Phy-Maths); SST (General) noted against each BPS-16 (Rs. 15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government on the term and condition given below in the said notification are adjusted in the school noted against each with effect from the date of taking over charge in the interest of public service.

ETC
[Signature]

1. SST (Bio-Chemistry)

PROMOTION OF SCT/CT TO SST- I (Bio-Chemistry) BPS-16.

S.No	Name of Teacher	Present School	Name of School where adjusted	Remarks
1.	Shabnam	GGHSS; Kalakaly	GGHSS; Kalakaly	Against SST-I vacant post
2.	Bushra Ali	GGHSS; Kabal	GGHSS; Kabal	Against SST-I vacant post

2. SST (Math's Physics)

PROMOTION OF SCT/CT TO SST- I (Phy-Maths). BPS-16.

S.No	Name of Teacher	Present School	Name of School where adjusted	Remarks
1.	Farzana Sumia	GGHS; Guligram	GGHS; Guligram	Against SST-II vacant post

3. SST (General)

PROMOTION OF SCT/CT TO SST TO THE POST OF SST (General).

S.No	Name of Teacher	PRESENT SCHOOL	Name of School where adjusted	Remarks
1.	Zeenat Jehan SCT	GGHSS; Odigram	GGHSS; Odigram	Against Newly created SST(G) vacant post
2.	Bukht Jehan SCT	GGHSS; Charbagh	GGHS; Chantalai	Against vacant SST-G Post
3.	Rawasia SCT	GGHS; Shahdara	GGHS; Sigran	Against vacant SST-G Post
4.	Majida SCT	GGHS; Aboha	GGHS; Zarakhela	Against vacant SST-G Post
5.	Rabia Ali SCT	GGHSS; Kabal	GGMS; Tall	Against vacant SST-G Post
6.	Neghar Bibi SCT	GGHSS; Mingora No2	GGHSS; Mingora No,2	Against SST-II post subj to the condition that she will teach Physics, Maths 9 th and 10 th classes.

"L" (33)

"G"
Seminar 2017 part 2



OFFICE OF THE

DISTRICT EDUCATION OFFICER (Female) SWAT

CONTACT #: (0946) 700686 Fax #: (0946) 700686

OFFICE ORDER

Consequent upon the services of SSTs regarding their promotion have been placed at the disposal of the undersigned by the Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide notification under Endst: No.3106-10/File No.2/Promotion SST B-16 dated 31/07/2017. The undersigned has been pleased to adjust the following teachers in the light of recommendation of local adjustment committee notified by DEO(F) Swat Vide Endst: No.12873 dated 07/08/2017 on regular basis to the school noted against each their name subject to the terms and condition under reference from the date of taking over charge in the interest of public service

1. PROMOTION OF SCT/CT TO THE POST OF SST (Bio-Chemistry) B-16

S.No	Name of Teacher(SCT/CT)	BPS	Present Station	Place Of Posting	Remarks
1	Alia	16	GGHS Guligram	GGHS Guligram	A.V. Post
2	Begum Nasim	16	GGHS Shahdara	GGHS Shahdara	A.V. Post

1. PROMOTION OF SCT/CT TO THE POST OF SST (Maths,Phy:) B-16

S.No	Name of Teacher(SCT/CT)	BPS	Present Station	Place Of Posting	Remarks
1	Husna	16	GGHS Sapal Bandai	GGHS Sapal Bandai	A.V. Post

1-PROMOTION OF SCT/CT TO THE POST OF SST (General) B-16

S.No	Name of Teacher(SCT/CT)	BPS	Present Station	Place Of Posting	Remarks
1	Wahida Habib	16	GGHS No.1 Mingora	GGMS Araq	A.V. Post
2	Shamim Rasool	16	GGHS No.1 Mingora	GGHS Panjigram	A.V. Post
3	Zeenat Mahal	16	GGHS Kokarai	GGMS Kishwara	A.V. Post

2. PROMOTION OF PSHT/PST TO THE POST OF SST (General) B-16

S.No	Name of Teacher(PSHT)	BPS	Present Station	Place Of Posting	Remarks
1	Naheed Begum	16	GGPS Tahir Abad	GGMS Bar Shawar	A.V. Post
2	Shaheena Bilbi	16	GGPS Gul Bandai	GGMS Usho	A.V. Post
3	Akhtar Begum	16	GGPS Chail Kokarai	GGHS Ghalegay	A.V. Post

Annexure "M" (34)

NTS 201

2017 SST Adhoc

57.3
CPC
Date
CCO

Swat Female Appointment Order SST Adhoc 3

Sr	Roll No	Name	Father Name	Permanent Address	Acad Mark (out of 100)	NTS Marks	Total Marks (Out of 200)	School
2	782000005	Huma Rani	Jehander Khan	Mingora Swat CNIC No. 15602-2522315-0 Mohalla Afsar Babad Saidu Sharif Swat	70.08	59	126.08	GGHS Shahdara
3	782000010	Karishma Sualiheen	Muhammad Sualiheen	Village And Post Office Barikot Mohallah Pozalabad District Swat CNIC No. 15602-5751688-1	66.43	51	117.43	GGHS Abaha
4	782000008	Naheed	Ali Muhammad	Shamak Chalyar Khawaza Khela Swat CNIC No. 15602-7520774-0	63.39	44	107.39	GGHS Chaganatalai
5	782000011	Sana Usman	Usman Ali	Awami Kitab Ghar And Sports Center Uduwan Market CNIC No. 15602-1101287-4	59.15	42	101.15	GGHS Amankai
6	782000012	Haram	Muhammad Zargar	Village Kalakalay Co Muhammad Ayz Pakala Kalay Teh Kabal District Swat CNIC No. 15602-3279717-8	54.79	46	100.79	GGHS Kalakalay

(SST General)

Sr	Roll No	Name	Father Name	Permanent Address	Acad Mark (out of 100)	NTS Marks	Total Marks (Out of 200)	School
1	783000111	Shehla Jalil	Abdul Jalil	Afaq Medical Shop Muhammad Khan Bazar Matta Swat CNIC No. 15601-248321-1	73.03	80	153	
2	783000279	Najma Mehmood	Mehmood Khan	Ali And Sons, Airport Road, Anwar Market, Near Kabal Bus Stand Mingora, Swat CNIC No. 15602-0741273-4	67.52	80	147	
3	783000212	Sana Mehro	Mehro Naish	Mohallah Kuz Palow Panjigra Post Office Tariq Abad Swat CNIC No. 15602-3230547-2	64.97	78	142.97	GGHS Kajam

(Minority Quota)
(SST Bio Chem)

Sr	Roll No	Name	Father Name	Permanent Address	Acad Mark (out of 100)	NTS Marks	Total Marks (Out of 200)	School
4	781000222	Jasmeet Kumari	Ram Saroop	Mohallah Darul Salam Near Darul Salam Masjid Gurn Mingora Swat CNIC No. 15602-9121987-6	65.27	50	115.27	Services placed at the disposal of DEO(F) Swat
5	781000324	Anila Kour	Hari Ram	Lakmi Das Cloth House Green Chowk Mingora Swat CNIC No. 15101-0264501-6	63.28	50	113.28	Services placed at the disposal of DEO(F) Swat

(Disable Quota)

"M" Annexure

Signature

16/5/17

"M"

35

"H" 2020 Part 4

Promotion of SST of District Swat

01.1971	23.7.2015	BSc(P/M) CT, B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST(P/M) in BPS-15 on regular basis with immediate effect
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ITEM No.2 PROMOTION OF SDAM/DM MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Number of Vacant Post of SST(P/M)	18
Total Recruitment of SST (P/M)	4.50
Analysis Quota of SST (P/M)	13.50
SDM/DM Quota to SST(P/M)	0.72
Post Available for Promotion (P/M)	1
Proposed SDM/DM for Promotion to SST (P/M)	1

Sr.	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular DM	Qual:	Remarks
1	Muhammad	GMS Dedawar	10.4.1983	1.7.2014	BSc(P/M) DM, B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST(P/M) in BPS-16 on regular basis with immediate effect

ITEM No.3 PROMOTION OF PSHT/SPST/PST MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS

Number of Vacant Post of SST(P/M)	18
Total Recruitment of SST (P/M)	4.50
Analysis Quota of SST (P/M)	13.50
PSHT/SPST/PST Quota to SST(P/M)	3.60
Post Available for Promotion (P/M)	2
Proposed PSHT/SPST/PST for Promotion to SST (P/M)	6

Sr.	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qual:	Remarks
1282	Muhammad Ubaid	GPS Gwalar	23.6.1972	31.8.2006	BSc, PTC, B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
1286	Sardar Ali	GPS Kotlai	1.4.1975	31.8.2006	BSc, PTC, B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
1302	Gohar Ali	GPS Kachi Gram	5.3.1984	31.8.2006	BSc, PTC, B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
1305	Muhammad Anwar Khan	GPS Kotlai	2.1.1983	29.2009	BSc, PTC, B.Ed	Services are placed at the disposal of DEO (M) Swat for further adjustment against the post of SST(P/M) in BPS-16 on regular basis with immediate effect.

Terms and Conditions:

- They would be on probation for a period of one year extendable for another one year.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 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 proceeded under the rules framed from time to time.
- When a report should be submitted to all concerned.
- Their Inter Service Seniority on lower post will remain intact.



apta kpk

Handwritten signature and initials on the right margin.

BEFORE THE HONORABLE CHAIRMAN SERVICE TRIBUNAL AT PESHAWAR

WAKALAT NAMA

SCANNED
KUST
Peshawar

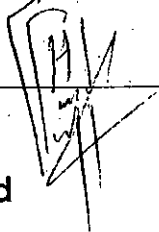
HAZRAT SAID Versus GOVT OF KPK & OTHERS

I / We, **Hazrat Said S/o Khurshid Rom R/o Chail Shagai, District Swat** do hereby appoint **Ahmad Hussain Advocate High Court**, in the above mentioned case, to do all or any of the following acts, deeds and things:-

- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this **11-10-2022**.

Signature of Executant(s). _____

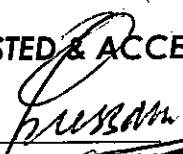


Hazrat Said

Cell No: 0333-9463542

NIC No: 15602-3154422-9

ATTESTED & ACCEPTED BY:


AHMAD HUSSAIN
Advocate

D - 3.4, Continental Plaza, Makanbagh, Mingora Swat Ph: 0333-9463

SCANNED
KPST
Peshawar

Khyber Pakhtunkhwa
Service Tribunal

Diary No.

4046

3/3/2023

BEFORE THE KHYBER PAKTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1504/2022

Hazrat Said S/O Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil Babuzai,
District Swat.

.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and secondary education Khyber Pakhtunkhwa at Peshawar.
3. District Education officer (Male) Swat.
4. District Account officer, Swat.

..... Respondents.

INDEX

S.No	Description of Documents	Annexures	Pages
1	Para-wise-comments	-	1-3
2	Affidavit	-	4
3	Authority Letter	-	5
4	Copy of Writ Petition	"A"	6-12


DISTRICT EDUCATION OFFICER (M)
SWAT AT GULKADA

BEFORE THE KHYBER PAKTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1504/2022

Hazrat Said S/O Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil Babuzai,
District Swat.

.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and secondary education Khyber Pakhtunkhwa at Peshawar.
3. District Education officer (Male) Swat.

..... Respondents.

Parawise Comments on Behalf of the Respondents

Respectfully shewith

Preliminary objections

1. That the Appellant is not an aggrieved person within the meaning of Section 4 of the Service Tribunal Act, 1974.
2. That the Appellant has no cause of action / locus standi.
3. That the Appellant has not come to this Honorable Tribunal with clean hands.
4. That the Appellant has filed this instant Service Appeal just to pressurize the respondents.
5. The present Service Appeal is liable to be dismissed for non-joinder/mis joinder of necessary parties.
6. That the instant Service Appeal is against the prevailing law and rules.
7. That the Appellant has filed this instant Service Appeal on malafide motives.
8. That the instant Appeal is **time barred**.
9. That the instant Service Appeal is not maintainable in the present form, and above in the present circumstances of the issue.
10. That the Appellant has been estopped by his own conduct.
11. That the Appellant has concealed the material facts from this honorable tribunal.

FACTS

1. That the Para No.1 pertains to record, hence, no comments.
2. That the Para No.2 is correct. However, it is further added that the Appellant was not considered for promotion as SST (Math/Physics) on the goursds that the term additional qualification was not mentioned in

the course certificate issued by the concerned university by the appellant rather the term professional certificate was mentioned therein.

3. That the Para No.3 is correct to the extent that the department has promoted teachers of district cadre to the post of SST BPS-16 in the light of prevailing rules and policy in field.
4. That the Para No.4 is incorrect and denied on the ground that the respondent department has considered the promotion cases of teachers to the post of SST (Math/Physics) in the DPC meeting held on 01.09.2021. However they were not promoted for having course certificates which were not verified/clearfield by the authorities concerned. It is further added that a similar nature case is pending for disposal before the Honorable PHC Principle bench in wherein the same issued has been raised before the Honorable Court.**(Writ Copy annexed as annexure A)**
5. That the Para No. 5 is incorrect and denied on the grounds that the appellant has treated as per law and rules along with his other colleagues.
6. That the Para No. 6 is incorrect and denied on the ground that the appellant is not titled to promotion form the date of 29.10.2021 in the light of promotion policy 2009 of the provincial Government. Moreover, it is pertinent to mention here that different courts of law has been observed in numerous Judgments/orders that notifications/orders shall take affect prospectively and respectively. Hence, the claim of the appellant for promotion against the post in question with effect from 29.10.2021 is not legal and liable to be declined.
7. That the para No. 7 is incorrect and misleading in the ground that the appellant is not filed any such departmental appeal before the appellant authority.
8. That the para No. 8 is correct to the extent that service appeal No. 936/2022 was dismissed by the Honorable Service Tribunal vide order dated 22.06.2022. Hence, needs no further comments
9. That the para No. 9 is incorrect and denied on the ground that only one teacher namely Muhammad Ghaffar has been promoted by respondent department to the post of SST (Math/Physics) vide order dated 22.02.2022 after removing of observation regarding verification/clarification of additional subjects by the concerned authorities in according with law, rules and policy.
10. That the para No 10 is incorrect and denied on the grounds that the appellant has been treated as per rules and policy and he has not been discriminated by the respondents.
11. That the para No. 11 is incorrect and misleading in the ground that the appellant is not filed any such departmental appeal before the appellant authority.
12. Thus, the instant Service Appeal of the Appellant is bereft of any merit, hence, liable to be dismissed inter-alia following grounds.

GROUND

- i. That detail reply of this para is given in the above paras, hence, no comments.
- ii. The detail reply of this para has already been given in the foregoing paras. However, It is further mention that this issue has also been raised by some candidates/Petitioners in their Writ petition which is pending before the PHC Principle bench.
- iii. That the Para No. iii pertains to record, hence needs no comments.
- iv. That the Para No. iv is incorrect and denied. The respondent department has not acted against the laws, rules and policy.
- v. That Para No. v is incorrect and denied. Respondent department cannot even think to act against the Constitution of Pakistan and have not violated any article of the constitution of the Pakistan.
- vi. That Para No. vi is incorrect and denied. The detail reply has already been given in the foregoing paras.
- vii. That Para No. vii is incorrect and denied. The detail reply has already been given in the foregoing paras.
- viii. That Para No. viii is incorrect and denied. The respondent department has not acted against the norms of services (E & D Rules 2011), laws and rules.
- ix. That Para No. ix is incorrect and denied. The respondent department has not acted against the policy, laws and rules.
- x. That the respondent department also seek permission of this Honorable tribunal to further the grounds at the time of arguments

It is, therefore, very humbly prayed that the instant Service Appeal of the Appellant may be dismissed with cost in favor of the respondents.

**DISTRICT EDUCATION OFFICER (M)
SWAT AT GULKADA**

**DIRECTOR,
ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA**

**SECRETARY,
ELEMENTARY AND SECONDARY
EDUCATION PESHAWAR**

BEFORE THE KHYBER PAKTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1504/2022

Hazrat Said S/O Khurshid Room Cheel Shagai, Saidu Sharif, Tehsil Babuzai,
District Swat.

.....Appellant

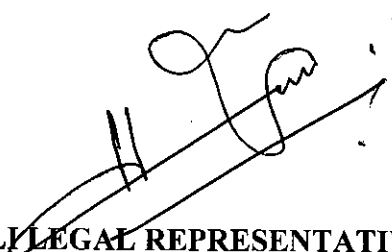
Versus

Provincial Govt. of Khyber Pakhtunkhwa & others

..... Respondents

AFFIDAVIT

I, Hussain Ali Legal Representative, do hereby solemnly affirm and declare on oath on the directions and on the behalf of the Respondents that the contents of the comments are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honorable Tribunal.



**HUSSAIN ALI LEGAL REPRESENTATIVE
O/O DEO (M) SWAT**



5



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY LETTER

It is certified that Hussain Ali, Legal Representative Office of District Education Officer (Male) Swat, Elementary & Secondary Education Department is hereby authorized to submit para-wise comments and attend the Service Tribunal, Camp Court Swat on behalf of Respondent Nos. 01, 02 & 03 in Service Appeal No. 1504/2022 Title Hazrat Said Vs Government of Khyber Pakhtunkhwa & Others on the eve of each hearing till the disposal of the instant case and shall also be responsible to obtain certified copy of the final judgment/order and submit the same to the department within limitation period.

A handwritten signature in black ink, appearing to read 'Hussain Ali', written over a horizontal line.

Secretary
Elementary & Secondary Education,
Department.

BEFORE PESHAWAR HIGH COURT,
PESHAWAR.



6

W P No 1-202

Annexure "A"

1. Muhammad Noshad Ali S/o Muhammad Shereef R/o
Taryar P.O. Police Thana Four District Peshawar
2. Muhammad Rasool S/o Gul Badshah R/o Muhalla Taryar
Lal District Hangu
3. Hakeem Habib Khan S/o Ashraf Khan R/o Warwizan,
Kases District Hangu
4. Muhammad Sivar S/o Habeeb Ullah R/o Muhalla Mastoon
Khal, Union Pawan District Peshawar.
5. Sarda Muhammad Aul Barki S/o Lal Hasanat Baria R/o
Goside Canal House No 172 Muhalla Inda Peshawar.
6. Raza Ullah Shah S/o Hmat Ullah Khan R/o Flat no MCH
109 w 7, Muhalla Bahadar garh, Hangu
7. Adnan Hussain S/o Gulab Hussain R/o Muhalla Mirza P
Lan 23 District Charsadda
8. Waqar Ali Shah S/o Talib Shah R/o Gondi Tehsil
Sardbad Muhalla Akhonzadgan District Charsadda
9. Muzaffar Din S/o Yaq Muhammad R/o Shah kam, Wari
Bala P.O. Tehsil Wari District Upper Dir
10. Latif Ahmad S/o Sher Ahmad R/o P.O. Wari Gogyal Tehsil
Wari District upper Dir
11. Salim Makh, S/o Khair ul Rehman R/o Wari Gogyal Tehsil
Wari District Upper Dir
12. Muhammad Akmal S/o Muhammad Akram R/o Foran Khal,
P.O. & Tehsil Dargai District Malakand.
13. Nadim Ullah S/o Muhammad Hakim S/o Bar Khwar P.O
Sahab Abad Wari Bala Tehsil Wari District Upper Dir.
14. Jalil-ud-Din S/o Muhammad Saeed Baeha R/o Kalal Bandi
P.O. Jabra Almes, Tehsil Dir District Upper Dir.
15. Syed Shah Hussain S/o Faz Ibrahim P/o Thaq Mastan
District Chattral
16. Imtiaz ul Din S/o Hoor Habib R/o P.O. Shah Goum Astuch
Tehsil Mastan District Chattral.
17. Zameen Khalid S/o Muhammad Zaman R/o Muhalla Dula
Colony Ghazi kot P.O. Mansilira District Mansilira
18. Saleem Makh, PST, Teacher District Peshawar
19. Alim Ullah Petitioner

Versus

1. Govt. of K.P.K., through Secretary Elementary & Secondary
Education, Civil Secretariat Peshawar
2. Director Elementary & Secondary Education K.P.K., Dabzar
Garden Peshawar.

WP145-2023 MUHAMMAD NOSHAD ALI VS GOVT. OF RGS115/MSB

ATTESTED
EXAMINER
Peshawar High Court

- 1. Higher Education Commission through its Chairman Higher Education Commission, Sector H-9, East Service Road Islamabad
- 2. Vice-Chancellor, University of Lakha Murwat
- 3. Aslam Khan S/O Feroz Khan P.O PST, Charsadda
- 4. Miran Mohi S/O Niaz Ali Shah P.O PST Charsadda
- 5. Muhammad Iqbal S/O Marat Gul, Primary School Teacher Pestawan
- 6. Anwar Ullah S/O Rehman ul Din Primary School Teacher Dir Lower
- 7. Aslam Khan S/O Muhammad Iqbal Primary School Teacher, Mardan
- 8. Haji Tanweer Ahmad S/O Meer Alam, Primary School Teacher Mardan
- 9. District Education Officer, Pestawan
- 10. District Education Officer, Charsadda
- 11. District Education Officer, Hangu
- 12. District Education Officer, Mardan
- 13. District Education Officer, Chitral
- 14. District Education Officer, Mardan
- 15. District Education Officer, Dir Upper
- 16. District Education Officer, Dir Lower

Respondent

**PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN 1973**

Respectfully Sheweth

The Petitioner humbly submits as under

Brief facts:

1. That the petitioners are permanent and bonafide resident different districts of Khyber Pakhtunkhwa and holding computerized national identity cards and domiciles. (CNICs are attached as annexure-A)

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ATTESTED
EXAMINER
 Peshawar High Court

2 That all the petitioners and respondents No 5 to 10 are serving the education department in the District concerned since their appointment till date and having multiple qualifications BA/B.Sc or equivalent qualification from recognized Universities of the province Khyber Pakhtunkhwa

3 That the Government of KPK through Respondent No.1 issued a Notification No. SO(PE) 5/SSRC/Meeting/ 2012/Teaching Cadre dated 13/11/2012 wherein the policy for appointment/promotion and transfer has been framed in light of Civil Servants (Appointment, Promotion and Transfer) Rules 1989

(Copy of Notification dated: 13.11.2012 is attached as annexure-B)

4 That the petitioners are most senior in the SPSTs / PSTs having qualification of B.Sc (Maths / Physics) & (Chemistry, Botany Or Zoology) and entitled for promotion to the post of SST (Maths / Physics) (Chemistry, Botany Or Zoology) according to policy / rules

That the respondent No 2 issued intimation regarding holding of DFC meeting for promotion eligible employees having qualification for SST General and in other fields i.e SST (Maths / Physics) & (Chemistry, Botany Or Zoology) and the employees were asked to submit their academics. The private respondents and some other employees submitted those documents, with the collusion of official respondents, who got additional subjects DMCs & fresh Degrees of B.Sc from the University of Respondent No.4. (Copies of some of the respondents are attached as annexure-C)

5 That the private respondents have submitted the fake degrees / certificates and Respondent No 2 has promised for promotion to the posts of SST (Maths / Physics) & (Chemistry, Botany Or Zoology) besides the facts that the Respondent no 5 to 10 and others lacks required qualification

WP145-2023 MUHAMMAD NESHAD ALI VS GOVT OF PGS115 USB

ATTESTED
EXAMINER
Pashtun High Court

but they obtained the Additional subjects and have attempted to change the nomenclature of B.A degree to BSc degree holder on fraudulent manner. On the other hand the petitioners being eligible and entitled for post contacted the respondent No. 1, 2 & 3 but they did not response positively.

- 6. That the petitioners were aggrieved from these acts of the Respondents preferred departmental appeals to Respondent No.1 which were processed but not decided till date and the respondent No.2 is about to issue the promotion orders of unqualified peoples.
- 7. That the petitioner approached the respondent No.3 for the verification / attestation of the degree and relevant documents of Respondent No.5 to 10 which was responded that their documents would never verify the same because the private respondents have concealed his earlier registration with University. But even then the Respondent No.2 have processed the case of private respondents for promotion and leaving the petitioners. By this conduct, of respondent No.2, petitioners are suffering mentally and monetary and if the after that the impugned actions / letter of respondent No.1 enhanced the agonies of the petitioner.
- 8. That the Petitioners time and again approached the respondents, and submitted that how is it possible that a person have got B. Ed degree prior from BA degree but in fact. The Petitioners were orally informed that the qualification of private respondents are not meeting the respondents requirements and not recognized by HEC but even then their qualifications are considered which violative of fundamental rights of the petitioners.
- 9. That, aggrieved by the actions/conducts of the respondents, and having no other adequate and efficacious remedy, the Petitioner do invoke the extra ordinary constitutional

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Dated 12/08/2023

ATTESTED
EXAMINER
Balochistan High Court

Ed degrees which is clear violation of rules / policy of promotion, which needs to be judicially handled.

f) That the Petitioners successfully completed the requisite service period and go through whole process, but without verification / attestation of the testimonials of the respondents which is the basic duty of the department for the respondents by an dishonest discriminatory act ignored / delayed the promotion process of the Petitioners and bestowed prospect to others for promotion, which is against the norms of justice.

g) That the Petitioners have been discriminated without any just and sound foundation because after passing of 15/20 long years how a BA degree holder is allowed to get additional subject qualification without fulfilling the requirement and which has not been verified and attested by HBC thereby offending the fundamental rights of the Petitioners as guaranteed by the constitution of 1973.

h) That how the respondent should offering the additional subjects to those peoples who are not graduate from his institution, and whether the respondent No.4 can issue Degree of B.Sc on the basis of only two subjects, these acts of the respondents is against the basic principles law and equity, hence, the actions of the respondents is nullity of law.

i) That the innocents students have studied for years in the institution now teachers who did not know the basics of science would teach the science subjects, all these acts has been done by the respondents just for promotion to get the financial benefits and the petitioners would be suffered by the actions and inactions of the respondents.

j) That the Petitioner reserves rights to advance other points at the time of hearing this petition.

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10/11/2023

WP145-2023 MUHAMMAD NOSHAD ALI VS GOVT CF PG3115 USB

ATTESTED
EXAMINER
Peshawar High Court

IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE ABOVE SUBMISSIONS THE INSTANT WRIT PETITION MAY GRACIOUSLY BE ACCEPTED AND DIRECTIONS MAY KINDLY BE ISSUED TO RESPONDENTS No. 1 to 3:

- i. TO DECLARE THE DEGREES / ADDITIONAL SUBJECTS CERTIFICATES / DMCS IS FAKE, FORGED, VIOL, ILLEGAL, UNCONSTITUTIONAL AND INOPERATIVE UPON THE RIGHTS OF THE PETITIONERS.
- ii. TO CONSIDER AND INCLUDES THE NAMES OF THE PETITIONERS IN THE ON GOING DEPARTMENTAL PROMOTION PROCESS;
- iii. TO DECLARE THE DEGREES / CERTIFICATES OBTAINED AFTER THE B.ED DEGREE IS AGAINST THE LAW AND RULES AND CANNOT BE CONSIDERED AS PER LAW FOR DEPARTMENTAL PROMOTION AND THE RESPONDENTS HAVE OBTAINED WITHOUT OBSERVING ALL CODAL FORMALITIES, AND IS ILLEGAL AND UNLAWFUL.
- iv. NOT TO ATTEST / VERIFY THE DEGREES OF THE RESPONDENTS AND OTHER SIMILAR PLACED PERSONS WHO GOT / CHANGED THE NOMENCLATURE OF DEGREES FROM BA TO BSC;
- v. THE RESPONDENT NO.4 AND OTHER UNIVERSITIES MAY KINDLY BANNED FROM ISSUING OF SUCH LIKE DEGREES / CERTIFICATES TO THOSE WHO HAVE ANY REQUISITE / BASIC QUALIFICATION FOR THAT DEGREE;
- vi. DIRECTIONS MAY KINDLY BE ISSUED TO RESPONDENTS TO FOLLOW THE RULES / POLICY IN IT TRUE LETTER AND SPIRIT; AND
- vii. GRANT ANY OTHER RELIEF DEEMED FIT AND APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE.

INTERIM RELIEF:

IT IS, FURTHER, PRAYED THAT THE PROMOTION PROCESS OF INCOMPETENT / INELIGIBLE PERSONS ON BASIS OF FAKED AND MANEUVERED DEGREES MAY KINDLY BE SUSPENDED TILL FINAL DISPOSAL OF THIS PETITION.

PETITIONERS
Through:

Asif Ali Shah

Haseen Ullah Gamaryani
Advocate High Court,
Peshawar

Certified that the Writ Petition has earlier been filed by the PETITIONER on the above subject before this Honorable Court

List of Books

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other law books as per needs

Advocate

Advocate

WP (45-2023) MUHAMMAD NOSHAH ALI VS GOVT CF PGS115 USB

ATTESTED
EXAMINER
High Court

(12)

**BEFORE THE PESHAWAR HIGH COURT,
PESHAWAR.**

CM No. _____/2023
In
WP No. 17/2023

Fazal Rabi & Others Petitioners

Vs

Government of KPK etc..... Respondents

AFFIDAVIT

I, **Naushad Ali S/O Muhammad Sharif R/O Jogyan Tarnab Form, Tehsil & District Peshawar**, do hereby solemnly affirm and declare upon oath that the contents of accompanied comments are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this Hon'ble court.

Identified by:

Asif Ali Shah
Advocate Supreme Court

Dated: 02.01.2023

Deponent

Nc: 17701-8613319-3

Mobil: 0313-9770106

FILED

27/1/23

For
mustafiz

vs

Naushad Ali
Peshawar
Dist. Peshawar

CERTIFIED TO BE TRUE COPY

Exemplar
Peshawar High Court Peshawar
Authorized Under Article 87, 89
1st Constitution Order 1985

28 JAN 2023

(Signature)
02/11/2023



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SWAT AT GULKADA
Cell # 0946 9240209-228

OFFICE ORDER.

Consequent upon the Notification Issued by the Director Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar vide his office Endst No. 9301-05/File No-1/Promotion of SST(BPS-16/2022 Dated Peshawar the 15/03/2023. The following SST(G),(Maths/Phy) and (Bio/Chem) (whose services were placed at the disposal of the DEO(M) Swat for further adjustment) are hereby adjusted against the posts in the schools noted against each in the interest of public service on regular basis under the existing policy of the Provincial Government on the terms & conditions given in the aforementioned Notification of the Director (E&SED) Khyber Pakhtunkhwa with immediate effect.

SST(GENERAL)

S.No	Name	Present School	School where promoted/posted	Remarks
1	Amir Muhammad SCT	GHSS Mingora	GHS Gullgram	A.V.P
2	Muhammad Khan SCT	GHSS Durushkhela	GHSS Bahrain	A.V.P
3	Shahi Mulk SCT	GHSS Kokaral	GHSS Kalam	A.V.P
4	Ismail SCT	GHSS Fatehpur	GHS Kedam	A.V.P
5	Misbahud Din SCT	GHSS Kabal	GHS Totano Bandai	A.V.P
6	Mian Akbar Zeb SCT	GHSS Durushkhela	GHSS Sakhra	A.V.P
7	Qalimat Gul	GHSS Matta	GHS Nazar Abad	A.V.P
8	Muhammad Naeem SCT	GHS Shln	GHS Shinkoo	A.V.P
9	Saleh Rahman SCT	GHSS Baidara	GHSS Sakhra	A.V.P
10	Salim Ahmad SCT	GHS Bandai	GMS Ghakhi Banda	A.V.P
11	Muhammad Dawood SCT	GHSS Khwazakhela	GMS Ayeen	A.V.P
12	Abdul Halim SDM	GHS Sherpalam	GHS Nazar Abad	A.V.P
13	Sayed Muhammad SAT	GHS Sambat	GHSS Slnpora	A.V.P
14	Khurshid Afrin PHST	GPS Baidara No. 2	GHSS Matta	A.V.P
15	Aftab Alam PSHT	GPS M. Gul Shaheed	GMS Gadi	A.V.P
16	Fazal Wadood PSHT	GPS Spena Khpa	GMS Ragastoon	A.V.P

(SST(B/C))

S.No	Name	Present School	School where promoted/posted	Remarks
1	Karam Ali SCT	GHSS No.3 Mingora	GHSS Balogram	A.V.P
2	Ibrar Hussain SCT	GHS Chancharay	GHS Shinkoo	A.V.P
3	Ghafoor Ullah SPST	GPS Dambara	GHS Gulibagh	A.V.P
4	Imtiaz Ahmad SPST	GPS Kanju Chawk	GHSS Deolai	A.V.P

(SST(M/P))

S.No	Name	Present School	School where promoted/posted	Remarks
1	Haidar Ali CT	GHS Kanju	GHS Kottlai	A.V.P
2	Aftab Ahmad CT	GHS Manyar	GHS Shamoza	A.V.P
3	Hazrat Said CT	GHSS Shagal	GCMHSS Wadudia	A.V.P
4	Rahmat Ali CT	GHS Segram	GHS Segram	A.V.P
5	Shah Hussain CT	GHSS Kabal	GHS Dardiyal	A.V.P
6	Irfanud Din CT	GHS Tirat Dara	GHS Tirat Dara	Appointed on acting charge basis Against vacant post
7	Muhammad Nadeem CT	GHSS Balogram	GHS Amankot	Appointed on acting charge basis Against vacant post
8	Muhammad Arif CT	GHSS Khwazakhela	GHSS Madyan	Appointed on acting charge basis Against vacant post
9	Shawkat Ali PST	GPS Balogram	GHS Nawakalay(0)	Against vacant post
10	Inayatullah PST	GPS Ghakhi Bandai	GHSS Totano Bandai	Against vacant post
11	Islam Gul PST	GPS Bara Bandai No:02	GHS Qandil	Against vacant post
12	Javed Iqbal PST	GPS Dheral	GHSS Sweegalai	Against vacant post

13	Abdullah PST	GPS Nishkapar	GHS Kas Shingrai	Against vacant post
14	Abdul Jalal PST	GPS Delay	GHS Khazana	Against vacant post
15	Saran Zeb SDM	GMS Ghakhi Banda	GHSS Totano Bandai	Against vacant post
16	Saeed Ullah Qari	GHSS Khwaza Khela	GHSS Madyan	Appointed on acting charge basis Against vacant post

Note;-1) Their documents will have to be checked by the concerned Principals/Head Masters and in case they do not possess the require relevant quallification as per rules they may not be handed over charge of the post.

- 2) Their necessary documents will be verified from the concerned institutions. Their pay will be released after the verification of documents.
- 3) The Princpals/Head Masters concerned with the directions that all above mentioned officials will continue to perform their dutles in digital census if already nominated.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst No: 10725-31/SST/Promotion

dated:17/03/2023

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

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The Principal/ Headmaster concerned.
4. The DMO EMA District Swat.
5. The EMIS of local office.
6. The candidate concerned.
7. PA to D E O local office.

DISTRICT EDUCATION OFFICER (M)
SWAT

27/9/23

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL
PESHWAR**

CM No. _____ /2023

IN

Service Appeal No.1504/2022

Hazrat Said S/O Khurshid Room

VERSUS

Govt of KPK etc.

Khyber Pakhtukhwa
Service Tribunal

Diary No. 7962

Dated 27/09/23

**APPLICATION FOR PLACEMENT OF MINUTES OF DPC MEETING
DATED 01.9.2021 AND CONCERNED WORKING PAPER.**

Respectfully sheweth:

1. That the above mentioned Service Appeal is pending before this Honourable Tribunal in which the next date is fixed on 05.10.2023.
2. That this Honourable Tribunal directed for provision of the above cited record on the last date of hearing i.e 07.07.2023.

It is, therefore, humbly prayed that the Respondents may be permitted to submit the minutes of DPC dated 01.9.2021 and concerned working papers.
(Working Paper & Minutes annexed as annexure A & B)


DISTRICT EDUCATION OFFICER (M)
✓ SWAT.

Swat

05/10/23



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWAT.

WORKING PAPER FOR DEPARTMENTAL PROMOTION COMMITTEE FOR THE POST OF CT BPS-15 TO SST(P/M) B-16

Total No of vacant posts of SST (P/M)	11
25% initial recruitment Quota	03
75% promotion Quota	08
40% CT/SCT promotion Quota to SST(P/M)	4 ✓
20% PST/SPST/PSHT promotion Quota to SST(P/M)	2
4% DM/SDM promotion Quota to SST (P/M)	1
4% TT/STT promotion Quota to SST (P/M)	1
4% AT/SAT promotion Quota to SST (P/M)	0
3% Qari/S.Qari promotion Quota to SST (P/M)	0
Total	11
Already promoted CT/SCT to SST(P/M)	04
Proposed for promotion to SST(P/M)	04

LIST OF CT (MALE) B-15 FOR THE PROMOTION TO SST(Science II)(P/M)B-16

S.No.	Sl.No.	Name of Teacher	Place of duty	D/O Birth	D/O Appointment	Date of Appointment as regular CT(Training)	Academic/ Professional Qualification	Whether eligible for up gradation	Documents Available	Remarks
* 1	454	Muhammad Ghafar	GHSS Deolai	02-04-70	07-03-96	29-05-16	BSC/CT/M.Ed	Yes	Yes	Passing BA 1995 passed Additional ✓



(Minutes)

Annexure "B" (4)

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

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 01-09-2021 AT 10:30 AM IN OFFICE OF THE DIRECTOR (E&SE) KHYBER PAKHTUN KHW A PESHAWAR.

A meeting of the Departmental Promotion Committee was held on dated 01-09-2021 at 10:30 AM under the Chairmanship of Director Elementary & Secondary Education Khyber Pakhtunkhwa to discuss the promotion cases of SCT/CT, SDM/DM, SAT/AT, STT/TT, SQari/Qari, & PSHT/SPST/PST Male to the posts of SST (General), SST (Bio/Chem) & SST (Maths/Phy) of the Elementary & Secondary Education Department. The following attended the meeting:

- Dr. Hafiz Muhammad Ibrahim**
Director Elementary & Secondary Education Khyber Pakhtunkhwa
In Chair
- Deputy Secretary/SO(PE)**
Elementary & Secondary Education Department Khyber Pakhtunkhwa
Member
- Mr. Fazli Wahid**
Deputy Director Elementary & Secondary Education Khyber Pakhtunkhwa
Member
- Mr. Muhammad Riaz**
District Education Officer (Male) Swat
Member

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. The following items were considered by the DPC and the decisions recorded are reflected against each item:

A. SST (General)

ITEM NO.1:- PROMOTION OF CT/SCT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of CT/SCT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
40% CT/SCT Promotion quota to SST(G)	18.13
Proposed CT/SCT for Promotion to SST(G)	11
Deferred CT/SCT for Promotion to SST(G)	5

S.No	Sen#	Name of official/	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	38	Bakhtmand	GHS: Asala	05-06-63	09/01/1995	BA/MA/ B.ED	Deferred due to file not submitted
2.	39	Mukaram Khan	GCMHSS Wadoodia	05-06-63	09/01/1995	BA/B.ED	Deferred due to B.Ed from Alkhair
3.	45	Khaista Mand	GHSS: Mingora	10-01-66	01/08/1995	BA/MA/ B.ED	Deferred due to file not submitted

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Promotion of SST of District Swat

4.	47	Muhammad Afzal Khan	GHSS Mankiyal	01-01-70	24/01/1996	BA/MA/ B.ED	Deferred due to B.Ed from Alkhair
5.	48	Muhammad Nisar Khan	GHSS Labat	16-04-75	20/12/2000	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	49	Muhammad Ifikhar	GHS Seer	13-04-68	25/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
7.	50	Fazal Hadi	GHS: Chitor	15-04-72	05/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	52	Nisar Khan	GHS: Shalhand	03-04-70	25/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
9.	54	Muhammad Ayub	GHSS Mingora	01-02-67	25/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
10.	56	Shaukat Ali	GCMHS: Wadoodia	11-04-69	25/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
11.	58	Farooq Ali Shah	GHSS: Deolai	01-12-70	25/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
12.	59	Muhammad Perviz	GHSS: Madyan	20-05-63	25/05/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
13.	60	Abdul Munim	GHSS:Sijbar	15-08-65	01/06/1996	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
14.	62	Muhammad Salim	GHS: Kanju	18-05-69	14/09/1996	BA/MA/ B.ED	Deferred due to B.Ed from Alkhair
15.	64	Muhammad Ghafoor	GHSS: Mingora	04-02-71	24/06/1997	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
16.	65	Muhammad Younas	GHSS Kalam	14-04-73	25/06/1997	BA/MA/ B.ED	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

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ITEM NO.2:- PROMOTION OF PST/SPST/PSHT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of PST/SPST /PSHT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
20% PST/SPST/PSHT to SST(G)	9
Proposed PST/SPST/PSHT for Promotion to SST(G)	8
Deferred PST/SPST/PSHT for Promotion to SST(G)	1

S.No	Sen#	Name of official/	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	102	Jehan Bacha	GPS Qila Qalagay	15/03/1964	31/12/1987	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	110	Zafar Ali	Gps Wali Abad	20/01/1965	08/01/1988	BA/B.Ed	Deferred due to B.Ed from Alkhair University.
3.	198	Ismail	GPS Giray dad	15/01/1968	05/03/1988	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
4.	211	Tahir Ali	GPS Peochar	15/06/1970	05/03/1990	BA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
5.	213	Qareeb ur Rahman	GPS Shakardara	01/01/1967	05/03/1990	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
6.	216	Laiq Sohrab	GPS Shaloon	01/06/1963	05/03/1990	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
7.	217	Jahan Abad Khan	GPS Radokrai	17/03/1970	05/03/1990	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
8.	218	Syed Akhtar Shah	GPS Awisha	10/03/1967	05/03/1990	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
9.	224	Abdul Kabir	GPS Shegal	01/02/1967	05/03/1990	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

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Promotion of SST of District Swat

ITEM NO.3:- PROMOTION OF DM/SDM TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of DM/SDM to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% DM/SDM Promotion quota to SST(G)	1.81
Proposed DM/SDM for Promotion to SST(G)	2

S.No	Sen#	Name of official/	Name of School	Date of Birth	Date of 1st Appointment as Regular DM	Academic & Professional Qualification	Remarks
1.	9	Hazrat Umar	GHSS KhwazaKhela	01/06/1969	22/04/1992	MA/DM/ B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	11	Muhammad Sher	GHS Bara Samai	25/01/1968	22/04/1992	MA/DM/ B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.4:- PROMOTION OF AT/SAT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of AT/SAT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% AT/SAT Promotion quota to SST(G)	1.81
Proposed AT/SAT for Promotion to SST(G)	1
Deferred AT/SAT for Promotion to SST(G)	1

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular AT	Academic & Professional Qualification	Remarks
1.	32	Amir zada	GHS laikot	5-3-1970	30-10-1994	BA/Shahadul Alamia/B.Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned
2.	34	Muhammad Ghani	GHS KasShingrai	12-05-1972	30/10/1994	MA Islamyat M.Ed Shahadul Alamia	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.5:- PROMOTION OF TT/STT TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of TT/STT to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
4% TT/STT Promotion quota to SST(G)	1.81
Proposed TT/STT for Promotion to SST(G)	2

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S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular TT	Academic & Professional Qualification	Remarks
1.	49	Attaullah STT	GHS Sirsinal	29-01-1978	26-03-2005	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.
2.	52	Muhammad Farooq STT	GHS No 1 Mingora	03-01-1975	26-03-2005	MA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

ITEM NO.6:- PROMOTION OF Qari/S Qari TO SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of Qari/S Qari to the post of SST (General) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(G)	46
25% Initial Recruitment Quota	12
75% by Promotion Quota	34
3% Qari/Sr.Qari Promotion quota to SST(G)	1.36
Proposed Qari/Sr.Qari for Promotion to SST(G)	1

S.No	Sen#	Name of official/Desig:	Name of School	Date of Birth	Date of 1st Appointment as Regular Qari	Academic & Professional Qualification	Remarks
1.	31	Anwar Ullah	GHS Nawakaly (B)	01-02-1968	24-6-1997	BA/B.Ed	Considered suitable for promotion to the post of SST (G) BPS-16 on regular basis with immediate effect.

B. SST (Bio/Chem)

ITEM NO.1:-PROMOTION OF CT/SCT TO SST (Bio/Chem) BPS-16 ON REGULAR BASIS

The case of promotion of CT/SCT to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	17
25% Initial Recruitment Quota	04.25
75% by Promotion Quota	12.75
40% CT/SCT Promotion quota to SST(Bio/Chem)	6.80
Proposed CT/SCT for Promotion to SST(Bio/Chem)	5
Deferred CT/SCT for Promotion to SST(Bio/Chem)	2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	440	Shah Wadan	GHSS Dehrai	04-12-74	28/05/2016	B.SC/CT/ M.ED	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.
2.	474	Tahir	GHS Manai	03-01-72	28/05/2016	B.SC/CT/ M.ED	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.

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Promotion of SST of District Swat

3.	676	Irfan Khan	GHS Shalpin	20-12-87	17-03-16	B.SC/CT/ B.ED	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
4.	677	Naecmullah	GHSS Batal Kh.Khela	20-04-88	17-03-16	B.SC/CT/ B.ED	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
5.	679	Fawad Ahmad	GHS Qalagay	03-06-88	17-03-16	B.SC/CT/ B.ED	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
6.	683	Amir Bahadar Khan	GCMHSS Waddodia	26-05-90	17-03-16	B.SC/CT/ B.ED	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
7.	684	Salman	GHS Chungai	10-05-87	17-03-16	B.SC/CT/ B.ED	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

ITEM NO.2:- PROMOTION OF PST/SPST/PSHT to SST (Bio/Chem) BPS-16 ON REGULAR BASIS

The case of promotion of PST/SPST/PSHT to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Bio/Chem)	17
25% Initial Recruitment Quota	04
75% by Promotion Quota	13
20% PST/SPST/PSHT to SST(Bio/Chem)	03.40
Proposed PST/SPST/PSHT for Promotion to SST(Bio/Chem)	1
Deferred PST/SPST/PSHT for Promotion to SST(Bio/Chem)	2

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	1100	Fazal Ghafoor	GPS Brabro	18/05/1973	24/06/2004	B.Sc/MA/Isl amyat B.Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.
2.	1500	Inamullah	GPS Matta	04/02/1985	02/09/2009	B.Sc Bio/Chem/M .Ed	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.
3.	1508	Zia ud Din	GPS Radokrai	12/01/1989	02/09/2009	BS.MEd	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.

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ITEM NO.3:- PROMOTION OF DM /SDM MALE TO THE POST OF SST (Bio/Chem) BPS-16 ON REGULAR BASIS

The case of promotion of DM /SDM to the post of SST (Bio/Chem) BPS-16 was considered and the DPC recommended as under:-

Total No of vacant Posts of SST(Bio/Chem)	17
Initial recruitment Quota	04
75% Promotion Quota	13
4% DM /SDM Promotion Quota to SST(Bio/Chem).	0.68
Proposed DM /SDM for promotion SST(Bio/Chem)	01

S. #	S.No	Name of candidate	Name of School	D/O Birth	D/O Apptt as regular DM	Ist as Professional Qualification	Remarks
1.	148	Mushtaq Ahmad	GHSS Sakhra	12-11-1990	17-03-2016	M.Sc Botnay	Considered suitable for promotion to the post of SST (Bio/Chem) BPS-16 on regular basis with immediate effect.

C. SST (Maths-Phy)

ITEM NO.1:- PROMOTION OF CT /SCT TO SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of CT /SCT to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-

Total No. of Vacant Post of SST(Maths/Phy)	11
25% Initial Recruitment Quota	2.75
75% by Promotion Quota	08.25
40% CT/SCT Promotion quota to SST(Maths/Phy)	04.26
Proposed CT/SCT for Promotion to SST(Maths/Phy)	0
Deferred CT/SCT for Promotion to SST(Maths/Phy)	4

S.No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular CT	Academic & Professional Qualification	Remarks
1.	454	Muhammad Ghafar	GHSS Deolai	02-04-70	29/05/2016	B.Sc/CT/M. Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.
2.	485	Haidar Ali	GHS Kanju	03-03-75	28/05/2016	B.Sc/CT/ B.Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.
3.	526	Hazrat Said	GHS Shagai	12-03-76	29/05/2016	B.Sc/CT/ B.Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.
4.	557	Rahmat Ali	GMS Segram	1-10-73	29/07/2016	B.Sc/CT/ B.Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.

ITEM NO.2:- PROMOTION OF PSHT/SPST/PST to SST (Maths/Phy) BPS-16 ON REGULAR BASIS

The case of promotion of PST/PSHT to the post of SST (Maths/Phy) BPS-16 was considered and the DPC recommended as under:-


Total No. of Vacant Post of SST(Maths/Phy)	11
25% Initial Recruitment Quota	03
75% by Promotion Quota	08
20% PST/SPST/PSHT to SST(Maths/Phy)	02.2
Proposed PST/SPST/PSHT for Promotion to SST(Maths/Phy)	0
Deferred PST/SPST/PSHT for Promotion to SST(Maths/Phy)	02


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Promotion of SST of District Swat

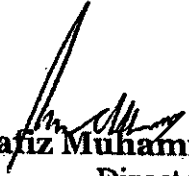
No	Sen#	Name of official	Name of School	Date of Birth	Date of 1st Appointment as Regular PST	Academic & Professional Qualification	Remarks
1.	1112	Mustajabullah	GPS Bara Sakhra	01/01/1978	24/06/2004	M.Sc/B.Ed/ M.Ed	Deferred due to Additional Subjects in B.Sc till clerification from DEO Concerned.
2.	1255	Islam Gul	GPS Bara Bandai No:02	20/03/1976	05/05/2006	MA	Deferred due to BA Pass in 1999 and B.Sc in Additional Maths/Phy 2020

The meeting ended with a vote of thanks to and from the Chair.


Mr. Muhammad Riaz
 District Education Officer
 (Male) Swat


Mr. Fazli Wahid
 Deputy Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa


Deputy Secretary/SO(PE)
 Elementary & Secondary
 Education Department
 Khyber Pakhtunkhwa


Dr. Hafiz Muhammad Ibrahim
 Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

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