

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

Service Appeal No: 586/2024


Abdul Jalil, SST (P/M) (BPS-16), GHS Bartooni District Torghar.....Appellant

VERSUS

The Secretary E&SED KP Peshawar & others.....Respondents

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(SAMINA ALTAF)
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar

(1)

(2)

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

Service Appeal No: 586/2024

Abdul Jalil, SST (P/M) (BPS-16), GHS Bartooni District Torghar.....Appellant

VERSUS

The Secretary E&SED KP Peshawar & others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-3

Respectfully Sheweth,

The Respondents 1 to 3 submit as under: -

PRELIMINARY OBJECTIONS.

- ~~Secretary Peshawar~~
14/23
10-07-2024
- 1 That the Appellant has got no cause of action/locus standi to file the titled appeal before this Honorable Tribunal.
 - 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
 - 3 That the impugned Notification dated 08-12-2023 of the Respondent No. 2 is within legal sphere.
 - 4 That the appellant has not come to this Honorable Tribunal with clean hands.
 - 5 That the appellant has concealed material facts from the ambit of this Honorable Tribunal in the titled appeal on mala-fide intentions.
 - 6 That the appeal in hand is bad for mis-joinder & non-joinder of the necessary parties to the titled appeal.
 - 7 That the act of the Respondent Department with regard to the grant of promotion to the appellant with effect from 08-12-2024 against the SST (M/P) in BPS-16 is according to the policy in vogue.
 - 8 That the appeal in hand is badly time barred under the relevant provision of law of limitation Act, 1908.
 - 9 That the appellant is estopped by his own conduct to file the titled appeal against the Respondents.
 - 10 That the appeal in hand is bad for mis-joinder & non-joinder of the necessary parties to the titled appeal.
 - 11 That the appellant is not entitled for anti dation of promotion w.e.f 22-04-2021 against the SST post under the Rules.
 - 12 That the appellant has concealed material facts from this Honorable Tribunal in the titled case.

(2) (5)

ON FACTS.

- 1 That Para-1 pertains to the service record of the appellant against the CT (M) in BPS-15 post inducted vide Notification dated 09-04-2016 on purely adhoc/contract base under recruitment policy, furthermore, the services of the appellant was regularized vide Notification dated 29-05-2019 against the said post by the Department. *(Copies of the Notifications are Annex-A & B)*.
- 2 That Para-2 is correct regarding framing of the service structure/Rules dated 24-07-2014, whereby, vide serial No. I/B, the mood for promotion to the post of SST in BPS-16 has been prescribed on the basis of seniority cum fitness under 40% reserved quota from SCTs in BPS-16 with at least 05 years qualifying service as CT in BPS-15 with the academic qualification of BSc Deree from recognized University from the groups with at least (02) subject of Chemistry, Botany or zoology or physics or Maths A & B or Statistic with English as a compulsory subject with professional qualification of B.Ed & M.Ed. *Copy of the Service Rules is Annex-C.*
- 3 That Para-3 correct that vide Notifications dated 13-05-2020 & 16-04-2021 (04) SSTs (Sc) in BPS-16 were promoted/appointed by the Department under the above refereed service structure, whereas, rest of the para is denied in the above said terms.
- 4 That Para-4 is incorrect as calling of ACRs from the teaching staff including the appellant does not accrued any vested right of promotion to the post of SST (P/M) in BPS-16 in the Respondent Department, therefore, the claim of the appellant is illegal & liable to be rejected.
- 5 That Para-5 is also incorrect, as per available record, the appellant was not eligible for the promotion to the post of SST (P/M) post in BPS-16 on 22-04-2021 being CT without the prescribed Lenth of service as prescribed under the cited Service Rules/structure dated 24-07-2014, therefore, the stand of the appellant is illegal & liable to be rejected.
- 6 That Para-6 is correct that a Departmental Appeal against the Notification dated 01-08-2021 has been filed by the appellant before the appellate authority which was seen & filed under the law & rules by the Department.
- 7 That Pra-7 is correct that vide order dated 21-09-2023, the appeal of the appellant was decided by this Honorable Tribunal with the direction to the Respondent Department for considering the case of the appellant in the titled appeal which was considered at a proper forum & consequently, the appellant was promoted against the SST (P/M) BPS-16 vide Notification dated 08-12-2023 under the Service Rules as referred above. *(Copy of the Notification dated 08-12-2023 is Annex-D)*.
- 8 That Para-8 is correct that the appellant was promoted against the SST (M/P) BPS-16 on dated 08-12-2023 under the said Service structure/Rules dated 24-07-2014 by the Respondent Department. Moreover, no post/vacancy was available under 40% quota for promotion of the appellant against the said post during the period on 22-04-2021 in the Department.
- 9 That Para-9 is also incorrect in the above said terms mentioned in Para-7 & 8 of the present reply by the Respondents before this learned Tribunal in the titled appeal.

(3)

10 That Para-10 is incorrect as the appellant is not an aggrieved person under the law as cited above as the act of the Department with regarding to the afore said Notification dated 08-12-2023 is in accordance with the provision & S.No. I/B dated 24-01-2014, is liable to be rejected on the following grounds inter alia.

ON GROUNDS.


- a. Incorrect & not admitted, as replied above.
- b. Incorrect & not admitted. The appellant could not qualify the prevailing service rules/structure dated 24-07-2014 during the period dated 22-04-2021, hence, not promoted from the said date & finally promoted to the post of SST on 08-12-2023 under the policy ibid.
- c. Incorrect & not admitted. The plea of the appellant is illegal as no vacancy of SST (M/P) in BPS-16 was available with the Department during the period dated 22-04-2021, therefore, the claim of the appellant is illegal & liable to be rejected.
- d. Incorrect & not admitted. Promotion is always notified with immediate effect in terms of Rules-VI of Promotion Policy, 2009 of the Provincial Government.
- e. Incorrect & not admitted. The plea of the appellant is illegal as he has been treated as per law & Rules vide Notification dated 08-12-2021 by the Respondent Department.
- f. Incorrect & not admitted. As replied above.
- g. Incorrect & not admitted. The stand of the appellant is against the facts & available record, hence, deserved dismissal in favor of the Department with further submission of seeking leave to submit additional grounds, case law & record at the time of arguments on the date fixed please.

Therefore, in view of the foremade facts & legal proposition, this Honorable Tribunal may kindly be pleased to dismiss the titled appeal in favor of the Respondents in the interest of justice.


SAMINA ALTAF
DIRECTOR

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

MASOOD AHMAD
SECRETARY


AUTHORIZED OFFICER
ABDUL AKRAM

ADDITIONAL SECRETARY (G)

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

(Respondent No: 1)

(4)

(5)

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

Service Appeal No: 586/2024

Abdul Jalil, SST (P/M) (BPS-16), GHS Bartooni District Torghar.....Appellant

VERSUS

The Secretary E&SED KP Peshawar & others.....Respondents

AFFIDAVIT

I, Samina Altaf, Director E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Partee nor their defense has been struck off/cost.

Samina Altaf
DEPONENT
SAMINA ALTAF
DIRECTOR
E&SE Khyber Pakhtunkhwa
Peshawar





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

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B

NOTIFICATION

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

S.NO	NAME OF TEACHER	FATHER NAME	SCORE	NAME OF SCHOOL WHERE APPOINTED	REMARKS
1	Kifayat Ullah	Muhammad Tahir	90.58	GMS Kand Dour Mera	Against V/P
2	Nusrat Shah	Iqbal Shah	92.37	GMS Shadag	--do--
3	Mujeeb Ur Rahman	Sultan Said	99.76	GMS Shagai	--do--
4	Shabbir Ahmed	Iktiar Malook	78.13	GMS Shingaldar	--do--
5	Abdul Jalil	Abdul Ghaffar	97.0	GMS Judba	--do--
6	Haleem Zada	Shereen	93.63	GMS Judba	--do--
7	Shakir Ullah	Ali Muhammad	96.16	GMS Shatal	--do--
8	Bakhti Zar Said	Nawab Said	112.19	GMS Cheer	--do--
9	Sharifur Rahman	Yaqub Khan	95.07	GMS Kotlay	--do--
10	Sham Shair	Asim Khan	94.13	GMS Kotlay	--do--
11	Safi Ullah	Aadur Rauf	91.99	GMS Kand Bala	--do--
12	Meraj Mehmood	Wazir Ur Rehman	106.32	GMS Kotkay	--do--
13	Syed Alam Khan	Syed Munawar Alam Khan	105.82	GMS Darow	--do--

TERMS & CONDITIONS:

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

ATTESTED

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

- (4) (6) (5)
9. They should produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
 10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
 11. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
 12. Their appointment is made on School based, they will have to serve at the place of posting, and their services are not transferable to any other station.
 13. The competent Authority reserve the right to rectify the errors and omissions, if any noted/observed at any stage in the instant order issued erroneously.
 14. Before handing over charge their document should be checked by the concerned Head of institutions, if they don't possessed the prescribed qualification of the post they should not be handed over the charge.

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

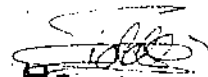
Endst: No. 919-28/Dated Tor Ghar 09th April 2016.

Copy forwarded for information and necessary action to the:-

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

ATTESTED


District Education Officer (M)
E&SE Tor Ghar


Head Master
GMS Seri Kohan
H/Z Torghar



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

Email: torgharedu@gmail.com

NOTIFICATION

In pursuance of the Section -3 of the Khyber Pakhtunkhwa employees of Elementary & Secondary Education Department (Appointment and Regularization of Service Act: 2017 read with Section -1 Sub-section (2) of the act, b.d and Elementary and Secondary Education Department Khyber Pakhtunkhwa Notification No. SO(S/F) E&SED/3-2/2019/SITT/Contract, Dated 16.02.2016, Service of the following Teacher (GT BPS-15) appointed on Adhoc basis on Contract, are hereby regularized in BPS-15 on the Same post in Teaching Cadre on the terms and condition given below with effect from the date of his appointment on the CT post.

S.No	Roll No	Name	Address	Total Marks (out of 200)	School	Appointment order No. & Dated
1	602700614	Abdul Jau	Darbani Aka Zai Tor Ghar	97.0	GMS Judba	No.919-28 Dated 09.04.2016

TERMS & CONDITIONS.

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

ATTESTED

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Encl: No 244-50 / Dated 27/15 /2019.

Copy for information to the.

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

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

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District Education Officer (M)
E&SE Tor Ghar

Annexure - C
17
B.C
C
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Peshawar, dated 24th July, 2014

NOTIFICATION:

No. SO (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notification No. SO (G) S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No. SO (G) S&L/1-69/06/Vol-1/DPE/LIB dated 13-11-2007, and Notification No. SO (PE) 4-5/SSRC/Meeting/2012 Teaching Cadre, dated 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

in the Appendix:-

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

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

ANNEX D
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				(b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University	22-35 years	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No.3</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(b) fifty percent by initial recruitment; and</p>

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(ii) Against Serial No. 1B shall be renumbered for the existing entries, the following shall be substituted in respective columns, namely:

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

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(19) B.C

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				<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Drawing Master, with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(c) Four per cent form amongst the Senior Arabic Teachers (BPS-16) with at least five years service as Senior Arabic Teachers and having qualification mentioned in column No. 3,</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers, with at least five years service as such and having qualification mentioned in column No.3;</p> <p>(d) Four per cent form amongst the Senior Theology Teachers (BPS-16) with at least five years service as Senior Theology Teacher and having qualification mentioned in column No. 3,</p>
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				<p><i>Provided—that—if no suitable candidate is available form amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification mentioned in column No.3;</i></p> <p><i>(e) Three per cent form amongst the Senior Qari (BPS-16) with at least five years service as Senior Qari and Qari having qualification mentioned in column No. 3,</i></p> <p><i>Provided that if no suitable candidate is available form amongst Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qari with at least five years service as such and having qualification mentioned in column No.3;</i></p> <p><i>(f) Twenty per cent form amongst the Primary School Head Teachers (BPS-16) with at least five years service as Primary School Teachers and Primary School Teachers having qualification mentioned in column No. 3,</i></p>
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				<p>Provided that if no suitable candidate is available from amongst Primary School Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Primary School Teachers, with at least five years service as such and having qualification mentioned in column No.3;</p> <p>Provided that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled, from amongst the Primary School Teachers, with at least Seven years service as such and having qualification mentioned in column No.3; and</p> <p>(ii) Twenty Five percent by initial recruitment.</p> <p>Note:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately</p>
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SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst: of even No & date:

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

ATTESTED

SD/-
(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

NOTIFICATION

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

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

A. SST (General)

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

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

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

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

B. SST (Bio/Chem)

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

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

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

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

C. SST (Maths/Phy)

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

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

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

S#	Name	Date of Birth	School
1	Muhammad Aqeel	03/04/1990	GPS Borl

Terms and Conditions:-

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

ATTESTED

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Promotion Order of SST of District Torghar (M) 2023

Their Inter-Se Seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.

No TADA is allowed for joining the duty.

They will give an undertaking to be recorded in their service books to the effect that if any over payment is made then in the light of this order, will be recovered and if wrongly promoted, will be reversed.

Before handing over charge, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over the charge of the post.

(Dr. Iqbal Khan)
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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

Dated Peshawar the 08/12/2023

Copy forwarded for information and necessary action to the:-

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

ATTESTED

08/12/2023
Assistant Director (Estab-M-1)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar




(7)

(1)

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

AUTHORITY LETTER

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in Service Appeal No. 586/2024 case titled **Abdul Jalil, District Torghar Vs Government of Khyber Pakhtunkhwa & others**, hence, an authority letter is hereby issued in favor of the above-named officer.


(Samina Altaf)
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar

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