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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

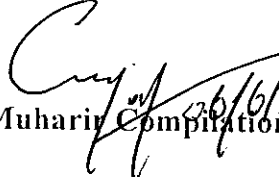
EXECUTION NO

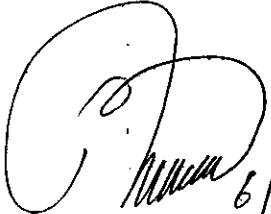
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Muhammad Saleem v.s Education

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Muharrir
26/6/24


6/6/24
Incharge Judicial Branch

8. As far as the precedents placed by the petitioner's counsel vide para 1 of the reply of objection petition in EP # 15/2017 in Service Appeal # 1109/2012 are concerned, in this regard as described under para 4 above that their adequate knowledge were duly assessed by the notified assessment committee in its meeting held on 02-07-2019 while due to demise death of the petitioner on dated 08-02-2018, the prescribed adequate knowledge in the relevant filed could not be assessed (Annex-VII).

9. It is therefore humbly prayed that on the acceptance of this implementation report, order sheet dated 07-02-2023 may kindly be revisited and the execution petition of the decree holder may kindly be dismissed being devoid of any merit.



(1)

KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

No. _____/ST Dated ____/____/2024

To

The Director Elementary & Secondary
Education Department Khyber Pakhtunkhwa Peshawar.

Subject

JUDGMENT IN SERVICE APPEAL NO. 1129-33/2022
TITLED RAJ MUHAMMAD KHAN & (4) OTHERS - VERSUS- THE
CHIEF SECRETARY TO THE GOVERNMENT OF KHYBER
PAKHTUNKHWA CIVIL SECRETARIAT PESHAWAR AND
OTHERS

Dear Sir,

I am directed to forward herewith a certified copy of judgment dated. 12.12.2023, passed by this Tribunal in the above mentioned service appeals for compliance.

Encl. As above.

(AAMIR FAROOQ KHATTAK)
ASSISTANT REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL,
PESHAWAR.

ORDER

12.12.2023

01. Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present. Arguments heard and record perused.

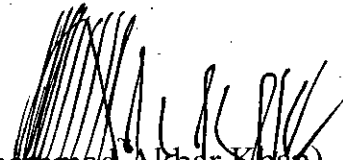
02. Vide our detailed judgment of today separately placed on file of service appeal bearing No. 1129/2022, titled "Raj Muhammad Khan Versus The Chief Secretary to the Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and others", this appeal is also remitted to respondent department for placement before the PSB for consideration of proforma promotion of the appellant from BS-19 to BS-20. Costs shall follow the event. Consign.

03. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 12th day of December, 2023.*

**SCANNED
KPST
Peshawar**



(Rashida Bano)
Member (J)



(Muhammad Akbar Khan)
Member (E)


17.08.2023 1. Junior to counsel for the appellant present. Mr. Fazal Shah

Mohmand learned Additional Advocate General for the respondents present.

2. Due to summer vacations D.B is not available, therefore, case is adjourned. To come up for arguments on 12.12.2023 before D.B.

P.P given to parties.

SCANNED
KPST
Peshawar


(Rashida Bano)
Member (J)

6th Jan, 2023

None for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

There is nobody present on behalf of the respondents nor did they submit written reply/comments. The time provided in Rule-12 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 for filing reply is seven days before the date fixed but despite providing opportunity the respondents have not filed the comments. They are thus placed ex-parte and their right to file reply stands struck off. Therefore, let this appeal be admitted to full hearing subject to all just and legal objections. The appellant is directed to deposit security fee within ten days. To come up for arguments on 21.02.2023 before D.B.

SCANNED
KPST
Peshawar

Rs-100/-
Appellant Deposited
Security & Process Fee
A. J. J. 22/2/23

(Kalim Arshad Khan)
Chairman

21.02.2023

Bench is incomplete, therefore, case is adjourned to 24.05.2023 for the same as before.

Reader

24th May, 2023

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

2. Junior to counsel for appellant requested for adjournment as senior counsel for appellant is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 17.08.2023 before D.B. P.P given to the parties.

REC
D.C.
ED

(Fareeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman

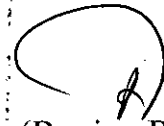
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29.11.2022

Junior to counsel for the appellant present. Kabir Ullah Khattak Additional Advocate General alongwith Behramand Khan Deputy Director and Naseer Uddin Shah Superintendent for respondents present.

SCANNED
KPST
Peshawar

Written reply on behalf of respondents not submitted. Representative of the respondents sought time for submission of written reply. To come up for written reply/preliminary hearing on 06.01.2023 before S.B.

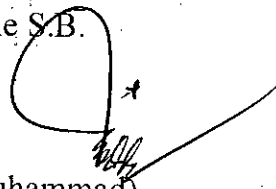


(Rozina Rehman)
Member (J)

(6)

21.09.2022

Mr. Allahyar Khan Tareen, Advocate submitted Wakalatnama on behalf of the appellant. Being freshly engaged, learned counsel for the appellant requested for adjournment to further prepare the brief. Adjourned. To come up for preliminary hearing on 12.10.2022 before the S.B.



(Mian Muhammad)
Member (E)

12.10.2022

Counsel for the appellant present.

Let pre-admission notice be issued to respondents for submission of written reply/comments for the date fixed. To come up for written reply/preliminary hearing on 29.11.2022 before S.B.



(Fareeha Paul)
Member (E)

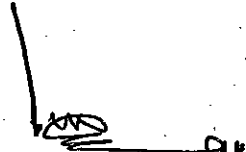
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The appeal of Mr. Muhammad Saleem retired Principal E&SE Department received today i.e. on 07.07.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of judgment mentioned in para-5 of the memo of appeal (Annexure-D) is not attached with the appeal which may be placed on it.
- 2- Annexure-E of the appeal is illegible which may be replaced by legible/better one.

No. 2197 /S.T,

Dt. 13/07 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Inayatullah Khan Tareen
Adv. High Court Pesh.

1-^{1st} objection is meted out.

2 - Annex E is legible, may put up without better copy -

Inayatullah Khan Tareen
Advocate

Inayatullah Khan Tareen
13/7/22

(9)
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Muhammed Saleem VS Govt of K.P.K

etc

S#	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: Enayat Ullah Khan Tareen
 Signature: [Signature]
 Dated: 07-07-2022

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

SCANNED
KPST
Peshawar

Service Appeal No. 1132/2022

Muhammad Saleem S/O Muhammad Noor, Retired
Principal BS-19, Elementary & Secondary Education
Department, resident of Farooq-i-Azam Town, Ratta
Kulachi, Tehsil and District Dera Ismail Khan.

... (Appellant)

VERSUS

The Chief Secretary to the Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar and 03 others. Respondents

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5.	Copy of judgment	D	23-24
6.	Copy of the letter of respondent No. 4 and of said application	E & F	25-26
7.	Copies of said letters one dated 23-12-2021 and of two dated 12-01-2022	G to I	27-37
8.	Copy of tentative seniority list, of final seniority list as stood on 31-12-2021, of the retirement order and of departmental representation	J to M	38-43
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Dated 06/07/2022

Muhammad Saleem
APPELLANT

Through:

Inayatullah Khan Tareen
Inayatullah Khan Tareen
Advocate High Court,
At Peshawar
Cell Ph#03325700875

(11) (1)

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

Service Appeal No. 1132/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 686

Dated 07-7-2022

Muhammad Saleem S/O Muhammad Noor, Retired
Principal BS-19, Elementary & Secondary Education
Department, resident of Farooq-i-Azam Town, Ratta
Kulachi, Tehsil and District Dera Ismail Khan.

(Appellant)

VERSUS

1. The Chief Secretary to the Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary to the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
3. Secretary to the Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar.
4. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar..... (Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR
PROMOTION FROM THE DATE WHEN THE APPELLANT
CAME WITHIN THE ZONE OF CONSIDERATION ON THE
BASIS OF HIS SENIORITY.**

Filed to-day

Registrar

07/07/2022

PRAYER

On acceptance of this appeal, it may graciously be held that the appellant for the first time came within zone of consideration for promotion from BS-19 to BS-20 when his name was included in the panel of officers sent with the working paper taken up in the meeting of PSB held on 30-12-2020 but his promotion was delayed for one or the other reason not attributable to him and ultimately he retired from service on

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attaining the age of superannuation without his actual promotion for which he was entitled under the facts and law. So, a befitting direction may graciously be issued to the respondents to include the name of appellant in the seniority list dated 31-12-2021 and to grant notional promotion to him from 30-12-2020 with back and retiral benefits.

Any other relief as deemed fit in favor of the appellant may also be granted to meet with the ends of justice.

=====

Respectfully Sheweth,

The appellant seeks to make the following submissions:-

1. That appellant joined the government service under the respondent department in the year 1986 as CT and in continuity of said service, he was selected for the post of Subject Specialist BS-17 through competitive examination held by the Khyber Pakhtunkhwa Public Service Commission and was appointed in BS-17 on 22-10-1991. Then in due course of time, he was promoted to the post of BS-18 and then of BS-19 and having served the department for a long time retired from service on 01-02-2022 by superannuation.
2. That the appellant having requisite length of service at his credit was eligible for promotion to the post in BS-20 since long but he entered within the zone of consideration for promotion on the basis of seniority in the year 2020 when his name was included in the panel of officers sent with the working paper taken up by PSB in its meeting held on 30-12-

13

3

2020. Copy of Seniority list as stood on 31-12-2019 and of the said working paper are respectively Annexure "A" and "B".

3. That number of vacancies to be filled was shown as 15 in the working paper Annexure-B with a breakup of 05 and 10 vacancies. 10 vacancies were shown to have occurred due to conditional retirement of officers in BS-20 in wake of dispute about superannuation age being 60 years or 63 years because of the Khyber Pakhtunkhwa Civil Servant Act (Amendment) Act, 2019 and its annulment by the Peshawar High Court Peshawar. The name of the appellant appeared at Sr. No. 12 in the panel of officers prepared from the final seniority list as it stood on 31-12-2019. The PSB took up the case only for 05 vacancies where against first 05 panelists were recommended for promotion and 10 vacancies were left over may be because of said dispute. Had those ten posts were not left over, the appellant would have been promoted as he was in range of seniority among the empaneled officers.
4. That it is a matter of fact that the superannuation age of civil servants was enhanced from 60 years to 63 years by Khyber Pakhtunkhwa Civil Servant Act (Amendment) Act, 2019 but its *vires* were challenged before the Hon'ble Peshawar High Court, Peshawar through a writ petition. The said Act was declared *ultra vires* and the Government challenged the judgment of High Court before august Supreme Court of Pakistan. The case was remanded to the High Court from the

(14) (4)

august Supreme Court of Pakistan and thereafter the superannuation age was restored as 60 years by another amending law i.e. Khyber Pakhtunkhwa Civil Servant Act (Amendment) Act, 2021 copy whereof is **Annexure "C"**.

5. That on one hand the promotion on 10 posts of BS-20 falling vacant due to conditional retirement of incumbents was withheld and on the other hand, some officers junior to the appellant in seniority list of BS-19 Teaching Cadre as stood on 31-12-2019, challenged the said seniority list through service appeals No.16424/2020, 16425/2020, 16426/2020, 16427/2020 and 16428/2020 before the Khyber Pakhtunkhwa Service Tribunal and promotions on the basis of impugned seniority list in BS-20 were stayed. The appellant and others got themselves impleaded as private respondents in the said appeals which ultimately were dismissed by a single judgment dated 09-11-2021 passed in service appeal No. 16424/2020 titled "Abdul Hamid Butt Vs. Chief Secretary and others". Needless to say that after settlement of superannuation age as 60 years and dismissal of the said service appeals against seniority, both the hurdles in way of promotion of the appellant stood vanished. Copy of said judgment is **Annexure "D"**.
6. That retirement of the appellant by superannuation was due on 01-02-2022 and prior thereto, a meeting of PSB was held on 02-12-2021 but no working paper in respect of the appellant for consideration of PSB was submitted by the

(15) (5)

respondents No. 2 and 4 albeit there was no impediment for submission of such working paper.

7. That the appellant and other similarly placed officers, when expecting long due promotion against the regular vacancies existing since the year 2020, did not see any serious departmental effort to give them their due promotion in BS-20, they got the matter sensitized through request of the School Officers Association which caught the departmental attention as evident from the letter of respondent No. 4 addressed to the Section Officer (Schools Male) of the Office of Respondent No. 2. The appellant, in anticipation of his soon reaching retiral age, also submitted an application dated 27/12/2021 for promotion by circulation from BS-19 to BS-20 in the office of Chief Secretary. Copy of the letter of respondent No. 4 and of said application are respectively **Annexure "E" and "F"**.

8. That may be in aftermath of letter Annexure-E, working paper was sent by the respondent No. 2 vide his department letter No. SO(SM) E&SED/3-3/2021/Promotion BS-19 to 20 TC dated 23-12-2021 to the Section Officer (PSB) of the Establishment Department. However, charging the said working paper with technicalities, the same was returned to the respondent No. 2 from the department of Respondent No. 3 vide letter No. SO (PSB) ED/1-4/2021/P-213 dated 12-01-

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2022 and the same was further transmitted to respondent No. 4 by letter No. SO(SM) E&SED/3-3/2021/Promotion BS-19 to 20 TC dated 12-01-2022. Copies of said letters one dated 23-12-2021 and of two dated 12-01-2022 are respectively **Annexure "G" "H" and "I"**.

9. That when the working paper was again sent to the department of respondent No.3 after doing the needful in light of his department's letter No. SO (PSB) ED/1-4/2021/P-213 dated 12-01-2022, the appellant by then stood retired from service but he was in service on 31-12-2021 when the seniority list required to be notified by said letter was prepared. Astonishingly, appellant's name from the final seniority list as stood on 31-12-2021 was removed although it was there in the tentative seniority list, as the appellant was in service by that time. Thus, the appellant was not treated in accordance with law. It may be submitted that not only name of the appellant should have been included in the said seniority list but he was supposed to be included in panel of officers notwithstanding his retirement. Anyhow, having been deprived from his due right of promotion before his retirement despite being within the zone of consideration since long, the appellant filed a departmental representation before the respondent No. 1 seeking notional promotion from BPS-19 to BPS-20 which was received in his office vide Diary No. ¹³⁷⁶1376 W/E dated 17-03-2022. However, the appellant has not been communicated with any order in relation thereto till expiry of the waiting period

(17) (7)

of 90 days for further remedy. Copy of tentative seniority list, of final seniority list as stood on 31-12-2021, of the retirement order and of departmental representation are respectively **Annexure "J", "K" "L" and "M"**.

10. That appellant is reasonably aggrieved from delaying of his due promotion since 30-12-2020 and from omission of the respondents to promote him before his retirement seeks to impugn their acts and omissions tantamount to denial of promotion to the appellant in BS-20, inter alia, on the grounds as follow hereinafter:-

GROUND

- A. That the case of the appellant in nutshell is that his name appeared at Sr. No. 12 in the final seniority of officers of Teaching Cadre in BS-19 as it stood on 31-12-2019 (Annexure-A). There were fifteen vacant posts in BS-20 as officially indicated in the working paper sent for promotion of the panelist officers including the name of appellant as per his seniority position. The said working paper when taken up by PSB in its meeting held on 30-12-2020, PSB unreasonably refrained from making recommendation for promotion on ten posts out of 15 and as such the appellant despite being in range for promotion on the basis of his seniority-cum-fitness was deprived from promotion in BS-20 due to unwarranted refrain of PSB.

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- B. That the circumstances in furtherance of the refrain of PSB, which contributed into delay in sending up the case of appellant and other similarly placed officers for consideration of PSB despite existing of the vacancies, are not attributable to the appellant and he has suffered for no fault of his.
- C. That, the appellant having entered within the zone of consideration for promotion from BS-19 to BS-20 on the basis of his seniority-cum-fitness, stood imbued with reasonable expectation for such promotion since 30-12-2020 but his expectation remained fruitless due to acts and omissions of the respondents having no justification under the facts and law. So much so, the respondent department happened with unfair treatment with the appellant by removing his name from the seniority list as it stood on 31-12-2021 when he was in service. Thus, the said seniority list is liable to correction.
- D. That phenomenon of notional promotion gets nourishment from the principles of natural justice when a civil servant having rendered a meritorious service is retired without fulfilment of his reasonable expectation for career progression due to sheer ignorance of his eligibility and seniority-cum-fitness by the departmental authorities, particularly, when vacancies do exist for consideration of his promotion by PSB. The case of the appellant fully attracts the principles of natural justice to grant him notional promotion after retirement when he left no stone unturned in his struggle during service for the

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right of his consideration for actual promotion before his attaining the retiral age.

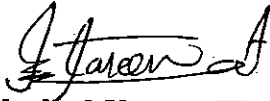
- E. That in furtherance of his pre-retirement pursuit for his consideration for promotion under due course, the appellant was hopeful after filing representation before the respondent No. 1 that he may be kind enough to consider his case for notional promotion positively but in vain.
- F. That the facts and grounds having foregone herein before fully justify the case of appellant for the relief as prayed for. Any other ground found necessary will be raised during the course of arguments with permission.
- G. That this appeal is within time from the expiry of 90 days after filing of departmental appeal and this Honourable Tribunal has got jurisdiction to adjudicate upon the facts in issue and law stated herein above.

With the foregoing facts and grounds, it is requested that appellant's appeal may graciously be accepted as per prayer in the heading above.

Dated 06/07/2022


APPELLANT

Through:


Inayatullah Khan Tareen
Advocate High Court,
At Peshawar
Cell Ph#03325700875

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

Service Appeal No. _____/2022

Muhammad Saleem S/O Muhammad Noor, Retired
Principal BS-19, Elementary & Secondary Education
Department, resident of Farooq-i-Azam Town, Ratta
Kulachi, Tehsil and District Dera Ismail Khan.

... (Appellant)

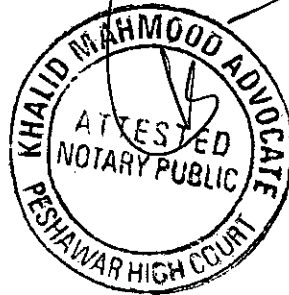
VERSUS

The Chief Secretary to the Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar and 03 others. Respondents

AFFIDAVIT

I, Muhammad Saleem, the above named
appellant do hereby declare on solemn affirmation that
contents of the accompanying appeal are true and
correct to the best of my knowledge and belief and
nothing has been kept concealed.

Dated 06/07/2022



DEPONENT

21

A
Ava
11

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the December 08, 2020

NOTIFICATION

NO.SO(SME&SED/2-3/2020/Final Seniority list of Principal (B-19) TC: In exercise of the powers conferred under Sub-Section (1) of Section-8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973), the Final Seniority List of Principal (BS-19) Teaching Cadre, (Male) Elementary & Secondary Education Khyber Pakhtunkhwa as it stood on 31-12-2019 is hereby notified for information of all concerned.

Encl: As Above:

Chief Secretary
Khyber Pakhtunkhwa

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Endst: of even No. & Date:

Copy forwarded to the:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar with the request to circulate the final seniority list to all concerned.
2. Director, Curriculum & Teachers Education Khyber Pakhtunkhwa, Abbottabad.
3. Director, PITE Khyber Pakhtunkhwa, Peshawar.
4. Additional Director, Education (Merged area) Khyber Pakhtunkhwa, Peshawar.
5. All District Education Officers (Male) in Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. Incharge EMIS E&SE Department.
8. Officers concerned.
9. Office order file.

(MUJEEB UR RAHMAN)
SECTION OFFICER (SCHOOLS/MALE)



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

Endst No: 3838-74

Dated 10/12/2020

Copy for information is forwarded to the:-

1. Director Curriculum & Teachers Education Khyber Pakhtunkhwa, Abbottabad.
2. Director, PITE Khyber Pakhtunkhwa Peshawar.
3. Additional Director, Education (Merged Area) Khyber Pakhtunkhwa Peshawar.
4. All District Education Officer (Male) in Khyber Pakhtunkhwa.
5. Section Officer (Schools/Male) with reference to his letter No and date cited above.
6. Officers Concerned.
7. PA Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.

ATTESTED

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

12

REVISED AND UPDATED (FINAL) SENIORITY LIST OF PRINCIPALS BPS-19 MALE E&SED Khyber Pakhtunkhwa (Teaching Cadre) as stood on 31/12/2019

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Name of Officer with Designation	Qualif.	D/O Birth	Domicil.	Date of 1 st Entry in Edu. Deptt.	Date of Present posting	BS	Method of Recruit	Remarks
1 Sher Nawaz Prl: GHS Landiwah Lakki Marwa	M.A M.Ed	15/03/1965	Bannu	22/10/1999	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
2 Muhammad Ashraf Deputy Director FITE Jamruil	M.Sc M.Ed	03/05/1961	Kohat	13/09/1990	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
3 Nazim ud Din Principal RITE (M) Darosh Chitral	M.A M.Ed	01/04/1964	Chitral	24/12/1989	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
4 Munawar Gul Prl: GHSS Tarab Farm Peshawar	M.A M.Ed	15/03/1962	Bannu	31/10/1981	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
5 Moia ud Din Principal GHSS Shakar Dara Kohat	M.Phil.Ed	01/01/1961	Karak	30/09/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
6 Muhammad Bashir Prl: GHS Kalo Khan Swabi	M.Sc B.Ed	05/04/1963	Swabi	22/01/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
7 Mir Daud Khan Prl: GHSS Nazim Nasib Nawaz ISSAKI Shaikhan Bannu	M.A B.Ed	03/02/1964	Bannu	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
8 Kiasat Khan Principal GCMHS Torbala Townshp Haripur	M.Sc B.Ed	13/03/1962	Abbottabad	13/10/1985	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
9 Sikandar Sher Prl: GHSS Mansabdar Swabi	M.A M.Ed	10/03/1962	Swabi	15/05/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
10 Neik Nawaz Khan Sec BISE Bannu	M.A B.Ed	08/09/1961	Bannu	22/03/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
11 Raj Muhammad Khan Secretary BISE DI Khan	M.Sc M.Ed	13/01/1962	Nowshera	17/02/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
12 Muhammad Salim Prl: GSSNCMHS No.1 Tank	M.A M.Ed	02/02/1962	D.I.Khan	11/11/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
13 Hussam ul Haq Prl: GHS No.3 Kohat	M.A M.Ed	01/01/1961	Kohat	11/02/1982	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
14 Abdul Halim Prl: GHS Jehagiri Karak	M.Sc M.Ed	16/07/1962	Karak	23/02/1984	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
15 Zabeer Ahmad Prl: GSMHHS Taru Jabba Nowshera	M.Sc M.Ed	13/11/1962	Bannu	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
16 Riaz Ahmad Babar Prl: GHS Civil Quarter Peshawar	M.Sc M.Ed	07/01/1964	Peshawar	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
17 Mir Laig Prl: GHSS Hakim Barat Bannu	M.A B.Ed	03/08/1961	Bannu	05/10/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
18 Muhammad Iqbal Prl: GHS Badber Pwshawar	M.A M.Ed	06/02/1962	Kohat	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
19 Snif Ullah Prl: GHSS Kot Kashmir Lakki	M.A B.Ed	02/08/1962	Bannu	13/02/1988	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
20 Nisar Muhammad DEO(M) Mansehra	M.Sc M.Ed	10/03/1963	Peshawar	14/11/1990	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
21 Taj Muhammad Prl: GHS Tur Dher No.1 Swabi	M.A M.Ed	31/12/1963	Mohmand Agency	19/03/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
22 Hafiz Muhammad Rauf Prl: GHS Bazar Ahmad Khel Bannu	M.A B.Ed	10/11/1963	Bannu	19/04/1986	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
23 Lutfuer Rahman Prl: GHSS labour Colony Mardan	M.A B.Ed	18/11/1963	Nowshera	30/12/1990	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
24 Muhammad Ajmal Prl: GHSS Takkar Mardan	M.Sc B.Ed	10/12/1961	Mardan	20/11/1986	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
25 Abdul Aziz Prl: GHS No.1 Abbott Abad	M.A M.Ed	23/02/1961	Bannu	23/02/1983	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
26 Muhammad Nazir Prl: GHSS Shinkari Mansehra	M.Sc B.Ed	20/01/1963	Mansehra	11/08/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
27 Muhammad Sharif Prl: GHS Kota Swabi	M.Sc M.Ed	02/06/1964	Swat	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
28 Muhammad Mutahir Member Text Book Board Peshawar	M.A M.Ed	22/03/1966	Swabi	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
29 Ajmair Shah Prl: GHS No.1 Nowshera kalan	M.A B.Ed	20/09/1967	Nowshera	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
30 Waqar Ali Prl: GHSS Dosehra Charsadda	M.A M.Ed	06/05/1970	Nowshera	28/08/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
31 Wali Khan Prl: GHS khujaki Killa Karak	M.Sc M.Ed	09/04/1969	Karak	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
32 Munawar Khan Prl: GHS Gul Bela Peshawar	M.Sc B.Ed	24/01/1968	Bannu	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
33 Syed Tajam ul Shah Prl: GHSS Manki Sharif Nowshera	M.A B.Ed	28/01/1965	Nowshera	12/02/1988	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
34 Muhammad Hanif Prl: GHSS Kachi Paind Khan D.I.Khan	M.Sc B.Ed	21/10/1966	D.I.Khan	26/09/1992	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
35 Hamid Ullah Jan Controller of Examinations BISE Peshawar	M.Phil M.Ed	12/10/1964	Lakki	17/03/1993	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
36 Bakht Zada Prl: GHS Pura Shogla	M.A B.Ed	11/09/1962	Swat	28/09/1992	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
37 Saeed Ullah Jan Prl: GHSS Gardai Bajour Agency	M.Sc B.Ed	25/04/1967	Bajaur Agency	26/09/1992	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
38 Bakhtiar Ahmad Secretary BISE Peshawar	M.A B.Ed	13/04/1967	Nowshera	26/09/1992	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
39 Muhammad Umar Prl: GHS No.3 Lakki	M.A B.Ed	07/09/1965	Lakki	25/01/1993	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
40 Said Jamil Sr.Instructor RITE Mardan	M.A B.Ed	09/01/1963	Mardan	18/02/1993	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
41 Fazal Subhan Prl: GHSS Sufaid Sung Peshawar	M.A B.Ed	14/11/1965	Charsadda	26/09/1992	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014
42 In Ullah Sr. Instructor RITE Ghorwala Bannu	M.Sc B.Ed	01/12/1965	Bannu	30/09/1992	21/04/2014	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014

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ATTENDED

Section Officer (S.M) Elementary & Secondary Education Department (Khy)

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30/12/2021

Ana. B

PSB-I

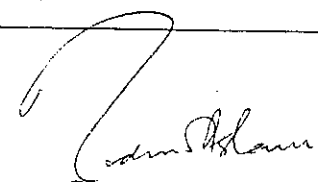
WORKING PAPER FOR PROVINCIAL SELECTION BOARD

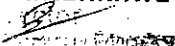
13/19

Department of Elementary & Secondary Education, Government of Khyber Pakhtunkhwa

Nomenclature of the post/Basic Scale	Principal Regional Institute for Teacher Education/Director Provincial Institute for Teacher Education (PITE) BS-20 (Male)		
Service/Group/Cadre	Provincial Education Services group BS-19 Officers of Teaching Cadre (Men's Section)		
Sanctioned strength of the Cadre	Total Sanctioned post in BS-20 of Teaching Cadre = 38 (Annexure-A)		
	Direct	Promotion	Transfer
Percentage of Share	---	100%	---
No. of posts allocated to each category	---	38	---
Present occupancy position	---	23 posts have occupied by regular BS-20 Officers (Annexure-B)	
No. of Vacancies in each category	---	15 Posts	---
How did the vacancy (ies) under promotion quota occurred and since when?	Post vacant due to the retirement of Officers in BS-20 = 05 (Annexure-C)		
	Post vacant due to retirement of officers Conditionally in BS-20 = 10 (as mentioned in Annexure-C)		
	Total Vacant = 15		
Recruitment Rules	Notification. No.SO(G)E&SED/1-28/2003/Vol-II dated 09.04.2004 & 04.05.2009 (Annexure D) a) <u>By selection on merit from amongst Principals High School/High Secondary School/Comprehensive High School/Regional Institute of Teacher Education and other equivalent regular post in BS-19 In Teaching Cadre with 17 Years service in BS-17 & Above or 12 Years service in BS-18 & Above or 05 Years service in BS-19 in Teaching Cadre</u> or b) <u>By transfer of an Officer of the School Management Cadre</u>		
Required length of service.	17 Years service in (BS-17 & above) or 12 years service in (BS-18 & above) or 05 years service in (BS-19)		
Whether to be promoted on regular basis or appointment on acting charge basis?	05 Vacancies will be filled on regular basis		
Mandatory training, if any.	NA		
Minimum required score on EI.	70		


Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar


Secretary
 Government of Khyber Pakhtunkhwa
 Elementary & Secondary Education


 Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar

SECRETARY
 Elementary & Secondary Education
 Govt of Khyber Pakhtunkhwa


ATTESTED

PANEL OF OFFICERS FOR CONSIDERATION

Sr	Sr No	Name of Officer with qualification	Date of Birth	Date of entry into Govt Service	Date of Appointment to Promotion to BS-17	Date of regular appointment promotion to BS-18	Date of last Appointment to Promotion to the present scale in BS-19	Whether fulfilled the prescribed length of service	Quantified scores	Missing P.T.Cs (if any)	Disciplinary proceeding (if any)	Case (if any) in any court of Law including NAB/plea bargaining with NAB	Mandatory training for promotion	Research papers	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	1	Sher Nawaz	15.03.1965	22.10.1991	22.10.1991	09.02.2004	13.06.2012	yes	52	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
2	2	Muhammad Ashraf	03.05.1961	13.09.1990	22.10.1991	09.02.2004	13.06.2012	yes	50	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
3	3	Nazim Ud Din Khan	01.04.1964	31.03.2024	22.10.1991	09.02.2004	13.06.2012	yes	50	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
4	4	Munawar Gul	15.03.1962	31.10.1981	22.10.1991	09.02.2004	13.06.2012	yes	50	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
5	5	Moin Ud Din	01.01.1961	30.09.187	19.03.1992	09.02.2004	13.06.2012	yes	55	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
6	6	Muhammad Bashir	05.04.1963	22.01.1991	22.10.1991	09.02.2004	13.06.2012	yes	53	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
7	7	Mir Daud Khan	03.02.1964	22.10.1991	22.10.1991	09.02.2004	13.06.2012	yes	56	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
8	8	Riasat Khan	13.03.1962	13.10.1985	22.10.1991	09.02.2004	13.06.2012	yes	57	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
9	9	Sikander Sher	10.03.1962	15.05.1987	22.10.1991	09.02.2004	13.06.2012	yes	55	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
10	10	Nek Nawaz Khan	08.09.1961	22.03.1992	22.03.1992	09.02.2004	13.06.2012	yes	54	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
11	11	Raj Muhammad Khan	13.01.1962	17.02.1992	17.02.1992	09.02.2004	13.06.2012	yes	57	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
12	12	Muhammad Salim	02.02.1962	11.11.1987	22.10.1991	09.02.2004	13.06.2012	yes	53	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis

PSB of 17/2008

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Deputy Director (Estt.)
 Elementary Education
 Khyber Pakhtunkhwa Peshawar.

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40	40	Said Jamil	09.01.1963	18.02.1993	18.02.1993	09.02.2004	21.04.2014	yes	Nil	No	No	No	post promotion training	No	Not Eligible for Promotion from BS-19 to BS-20 due to non-availability of PER for year 2012 to 2019
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CERTIFICATE:-

Certified that the officers included in the panel are eligible for promotion in all respect except serial No.20,35,36,38,39 & 40 due to non availability of PERs.

[Signature]
Director

Directorate of Elementary and Secondary
Education Khyber Pakhtunkhwa Peshawar.

Signature : *[Signature]*
Designation : PROBATIONARY
Date : 27/04/2015
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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[Signature]
ATTESTED

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PSB-III

PENAL PROFORMA FOR PROVINCIAL SELECTION BOARD

In respect of Muhammad Saleem

Per

Signature

Domicile – D.II.Khan		Service/Group		Sen: No. 12		
Education Qualification		Date of Birth		Date of Superannuation		
MA/Med		02.02.1962		01.02.2022		
SERVICE PARTICULARS						
Date of Joining/ Service	Date of Promotion in respect of			Length of Service		Eligibility for consideration
	Present Scale	Lower Rank		Total	In present Scale	
		B-17	B-18			
11.11.1987	13.06.2012	22.10.1991	9.2.2004	Y- 32 & 04 months	Y-8 & 01 month	Eligible for promotion
Important appointments held in the present Rank/post:						
1	Principal BS-19 GCMHS No. 1 Tank					
Penalties (if any) Nil						
Training Courses (other than mandatory Training)						
Number of PERs						
Basic Scale	Outstanding	Very Good	Good	Average	Below Average	Adverse report/ Remarks in
B-17		04	08	-	-	-
B-18		05	03	-	-	-
B-19		02	06	-	-	-
Awaited Reports (PERs)			Additional Information (if any)			
EFFICIENCY INDES						
Required Threshold	Score of PERs + Training Reports		Marks awarded by PSB		Total	
70	53					
Recommendations of PSB						
Promoted		Deferred		Superseded		

Prepared by

Checked by

Section Officer (SM) Elementary & Secondary Education Department (KP)

ATTESTED

PER GRADING AND QUANTIFICATION FORM FOR REGULAR PROMOTION TO BS-20
IN RESPECT OF Mr. RIASAT KHAN (DOB 13.03.1962)

Seniority No.8

Year	Period of PER		Pen Picture	Countersigning Officer	PERs Assessment	Fitness for Promotion	Score
	From	To					
Previous Scale (BP-17)							
1992	1.1.1992	31.12.1992	He is an honest and efficient worker	Agreed.	Good	Fit	7
1993	1.1.1993	31.12.1993	An intelligent honest and dutiful officer	Agreed.	Good	Fit	7
1994	1.1.1994	31.12.1994	An intelligent honest and dutiful officer	Agreed.	Good	Fit	7
1995	1.1.1995	31.12.1995	Cooperative energetic and submissive subordinate	Agreed.	Good	Fit	7
1996	1.1.1996	31.12.1996	A good teacher	Agreed.	Good	Fit	7
1997	1.1.1997	31.12.1997	A good teacher	Agreed.	Good	Fit	7
1998	1.1.1998	31.12.1998	Cooperative an honest and good teacher.	Agreed.	Good	Fit	7
1999	1.1.1999	31.12.1999	Cooperative and a submissive officer	Agreed.	V.good	Fit	10
2000	1.1.2000	31.12.2000	Punctual, hardworking, cooperative and obedient.	Agreed.	V.good	Fit	10
2001	1.1.2001	31.12.2001	Punctual, hardworking, obedient and cooperative	Agreed.	Good	Fit	7
2002	1.1.2002	31.12.2002	Hardworking and regular	Agreed.	V.good	Fit	10
2003	1.1.2003	31.12.2003	Dedicated and efficient				93
Previous Scale (BP-18)							
2004	1.1.2004	31-12-2004	He is a very Cooperative silent nature and devoted to his job duties and can solve the problems	Agreed	V.good	Fit	10
2005	1.1.2005	31-12-2005	He perform his duties efficiently and with keen interest	Agreed	V.good	Fit	10
2006	1.1.2006	31-12-2006	He is an efficient and hardworking officer	Agreed	V.good	Fit	10
2007	1.1.2007	31-12-2007	The officer is honest, dutiful, hardworking and painstaking officer	Agreed	V.good	Fit	8
2008	1.1.2008	31-12-2008	Industrious, enterprising and cooperative officer.	Agreed	Good	Fit	7
2009	1.1.2009	31-12-2009	Industrious, cooperative, courteous and helpful officer.	Agreed	Good	Fit	7
2010	1.1.2010	31-12-2010	He is regular, efficient, good communication skill and can be trusted. He can work in any circumstances	Agreed	V.good	Fit	8
2011	1.1.2011	31-12-2011	Industrious, enterprising, courteous and cooperative.				70
Present Scale (BP-19)							
2012	1.1.12	31.12.12	Regular industrious, enterprising and cooperative officer.	Agreed	V.good	Fit	8
2013	1.1.13	31.12.13	Cooperative, industrious enterprising and promising officer.	Agreed	V.good	Fit	8

[Signature]

Deputy Director
Education
Khyber Pakhtunkhwa Peshawar

[Signature]

REFLECTED

[Signature]

**PER GRADING AND QUANTIFICATION FORM FOR REGULAR PROMOTION TO BS-20
IN RESPECT OF Mr. RIASAT KHAN (DOB 13.03.1962)**

(22)

Seniority No.8

2014 A	1.1.14	30.4.14	Regular punctual task oriented, trustworthy and has very good ability to work under pressure.	Agreed	V.good	Fit	8
2014 B	1.5.14	31.12.14	Riasat Khan has the ability to work under pressure. He reliably applies own technical knowledge and solve the problems.	Agreed	Good	Fit	7
2015	1.1.15	31.12.15	An honest officer.	Agreed	V.good	Fit	8
2016	1.1.16	31.12.16	Honest and competent officer.	Agreed	V.good	Fit	8
2017	1.1.17	31.12.17	Skillful and seasoned officer.	Agreed	V.good	Fit	8
2018	01.01.2018	31.12.2018	Performed very well while his stay at district	Agreed	V.good	Fit	8
2019	01.01.2019	31.12.2019	Hardworking and trustworthy officer.	Agreed	V.good	Fit	8
							71

Comprehensive efficiency index

PERs Quantified Score 50:30:20@ 70%	Basic Scale	Aggregate Score	Weightage Factor	Points Obtained
	Present Scale	7.89	39.44	33.13
	Previous Scale(B)	8.75	26.25	23.38
	Previous Scale(A)	7.75	15.50	
	(i) Additions*			
	(ii) Deletions**			
	Total C5+B3+A2	24.39		56.51

Evaluation by the PSB out of 30 marks

G.Total

Required threshold on CEI for promotion to BP-20 is 70

- * 2 marks shall be added for serving in a government training institution including those meant for specialized training in any particular cadre for a period
- ** 5, 3 & 1 marks shall be deducted for each major, minor penalty and adverse remarks respectively.

ATTESTED
[Signature]

[Signature]
Secretary (DPE) (30)
Elementary Education Department (EE)
Education Department (EE)

[Signature]
Deputy Director (EE)
Elementary Education
Khyber Pakhtunkhwa Peshawar

[Signature]

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30/1/2020

REVISED AND UPDATED (FINAL) SENIORITY LIST OF PRINCIPALS: BPS-19/MALE E&SED Khyber Pakhtunkhwa (Teaching Cadre) as stood on 31/12/2019

PSB 2

S.#	Name of Officer with Designation	Qualif:	D/O Birth	Domicile	Date of 1 st Entry In Edu; Deptt;	Date of Present posting	BS	Method of Recruit	Remarks
1	Sher Nawaz Pri: GHS Landiwah Lakki Marwat	M.A M.Ed	15/03/1965	Bannu	22/10/1999	13/06/2012	19	By Promotion	
2	Muhammad Ashraf Deputy Director FITE Jamrud	M.Sc M.Ed	03/05/1961	Kohat	13/09/1990	13/06/2012	19	By Promotion	
3	Nazim ud Din Principal RITE (M) Darosh Chitral	M.A M.Ed	01/04/1964	Chitral	24/12/1989	13/06/2012	19	By Promotion	
4	Munawar Gul Pri: GHSS Tarnab Farm Peshawar	M.A M.Ed	15/03/1962	Bannu	31/10/1981	13/06/2012	19	By Promotion	
5	Moin ud Din Principal GHSS Shakar Dara Kohat	M.Phil.Edu	01/01/1961	Karak	30/09/1987	13/06/2012	19	By Promotion	
6	Muhammad Bashir Pri: GHS Kalo Khan Swabi	M.Sc B.Ed	05/04/1963	Swabi	22/01/1991	13/06/2012	19	By Promotion	
7	Mir Daud Khan Pri: GHSS Nazim Nasib Nawaz ISSAKI Shaikhan Bannu	M.A B.Ed	03/02/1964	Bannu	22/10/1991	13/06/2012	19	By Promotion	
8	Riasat Khan Principal GCMHS Torbala Township Haripur	M.Sc B.Ed	13/03/1962	Abbottabad	13/10/1985	13/06/2012	19	By Promotion	
9	Sikandar Sher Pri: GHSS Mansabdar Swabi	M.A M.Ed	10/03/1962	Swabi	15/05/1987	13/06/2012	19	By Promotion	
10	Neik Nawaz Khan Sec BISE Bannu	M.A B.Ed	08/09/1961	Bannu	22/03/1992	13/06/2012	19	By Promotion	
11	Raj Muhammad Khan Secretary BISE DI Khan	M.Sc M.Ed	13/01/1962	Nowshera	17/02/1992	13/06/2012	19	By Promotion	
12	Muhammad Salim Pri: GSSNCMHS No.1 Tank	M.A M.Ed	02/02/1962	D.I.Khan	11/11/1987	13/06/2012	19	By Promotion	
13	Hussam ul Haq Pri: GHS no.3 Kohat	M.A M.Ed	01/01/1961	Kohat	11/02/1982	13/06/2012	19	By Promotion	
14	Abdul Halim Pri: GHS Jehangiri Karak	M.Sc M.Ed	16/07/1962	Karak	23/02/1984	13/06/2012	19	By Promotion	
15	Zaheer Ahmad Pri: GSMHHS Taru Jabba Nowshera	M.Sc M.Ed	13/11/1962	Bannu	22/10/1991	13/06/2012	19	By Promotion	
16	Riaz Ahmad Bahar Pri: GHS Civil Quarter Peshawar	M.Sc M.Ed	07/01/1964	Peshawar	22/10/1991	13/06/2012	19	By Promotion	
17	Mir Laiq Pri: GHSS Hakim Barat Bannu	M.A B.Ed	03/08/1961	Bannu	05/10/1987	13/06/2012	19	By Promotion	
18	Muhammad Iqbal Pri: GHS Badber Pwshawar	M.A M.Ed	06/02/1962	Kohat	22/10/1991	13/06/2012	19	By Promotion	
19	Saif Ullah Pri: GHSS Kot Kashmir Lakki	M.A B.Ed	02/08/1962	Bannu	13/02/1988	13/06/2012	19	By Promotion	
20	Nisar Muhammad DEO(M) Mansehra	M.Sc M.Ed	10/03/1963	Peshawar	14/11/1990	13/06/2012	19	By Promotion	
21	Taj Muhammad Pri: GHS Tur Dher No.1 Swabi	M.A M.Ed	31/12/1963	Mohmand Agency	19/03/1992	13/06/2012	19	By Promotion	
22	Hafiz Muhammad Rauf Pri: GHS Bazar Ahmad Khel Bannu	M.A B.Ed	10/11/1963	Bannu	19/04/1986	13/06/2012	19	By Promotion	
23	Lutfur Rahman Pri: GHSS Labour Colony Mardan	M.A B.Ed	18/11/1963	Nowshera	30/12/1990	13/06/2012	19	By Promotion	
24	Muhammad Ajmal Pri: GHSS Takkar Mardan	M.Sc B.Ed	10/12/1961	Mardan	20/11/1986	13/06/2012	19	By Promotion	
25	Abdul Aziz Pri: GHS No.1 Abball Abad	M.A M.Ed	23/02/1961	Bannu	23/02/1983	13/06/2012	19	By Promotion	
26	Muhammad Nazir Pri: GHSS Shinklari Mansehra	M.Sc B.Ed	20/01/1963	Mansehra	11/08/1987	13/06/2012	19	By Promotion	
27	Muhammad Sharif Pri: GHS Kota Swabi	M.Sc M.Ed	02/06/1964	Swat	26/09/1992	13/06/2012	19	By Promotion	
28	Muhammad Mutahir Member Text Book Board Peshawar	M.A M.Ed	22/03/1966	Swabi	26/09/1992	13/06/2012	19	By Promotion	
29	Ajmair Shah Pri: GHS No.1 Nowshera kalan	M.A B.Ed	20/09/1967	Nowshera	26/09/1992	13/06/2012	19	By Promotion	
30	Waqar Ail Pri: GHSS Dosehra Charsadda	M.A M.Ed	06/05/1970	Nowshera	28/08/1992	13/06/2012	19	By Promotion	
31	Wali Khan Pri: GHS khujaki Killa Karak	M.Sc M.Ed	09/04/1969	Karak	26/09/1992	13/06/2012	19	By Promotion	
32	Munawar Khan Pri: GHS Gul Bela Peshawar	M.Sc B.Ed	24/01/1968	Bannu	26/09/1992	13/06/2012	19	By Promotion	

Director, G.T.O. (S) Education Department (K.P)

APPROVED

Annex-

**STATEMENT SHOWING THE NUMBER OF RETIRED/CONDITIONAL
RETIRED OFFICERS IN BS-20**

S//	Name of officer with Designation	Date of Birth	Date of Retirement
1.	Mr. Matiullah, Ex-Principal BS-20 GHSS No.1 Peshawar	Pre-Mature	31.10.2019
2.	Mr. Mir Qalam Khan, Ex-Principal BS-20 GHSS Karak	Pre-Mature	02.03.2020
3.	Mr. Hussain Ahmad, Ex-Principal BS-20 RITE (M) Timergara Dir Lower	25.02.1959	24.02.2019
4.	Mr. Luqman Ali Khan, Ex-Principal BS-20 GHSS No. 1 Mansehra	25.02.1959	24.02.2019
5.	Muhammad Riaz, Ex-Principal BS-20 RITE (M) Chitral	14.03.1959	13.03.2019 (case is under process)
6.	Mr. Attaullah Khan, Ex-Principal BS-20 GHSS No. 2 D.I Khan	01.01.1960	31.12.2019
7.	Mr. Dilawar Khan, Ex-Principal BS-20 GHS No. 2 Bannu	01.02.1960	31.01.2020 (Conditionally Retired)
8.	Mr. Hamayun Khan, Ex-Principal BS-20 GCMHS Timergara Dir Lower	03.02.1960	02.02.2020 (Conditionally Retired)
9.	Mr. Mir Baz Khan, Ex-Principal BS-20 GCMHS Daggar Buner	20.03.1960	19.03.2020 (Conditionally Retired)
10.	Mr. Hakim Ullah, Ex-Director BS-20 Director PITE Peshawar	02.04.1960	01.04.2020 (Conditionally Retired)
11.	Mr. Abdul Haq, Ex-Principal BS-20 RITE (M) Mardan	25.05.1960	24.05.2020 (Conditionally Retired)
12.	Mr. Ahmad Jan, Ex-Principal BS-20 GSUHHSS Charsadda	10.06.1960	09.06.2020 (Conditionally Retired)
13.	Mr. Sifat Ullah, Ex-Principal BS-20 GCMHS Lakki Marwat	01.09.1959	(Conditionally Retired)
14.	Mr. Zahid Rashid, Ex-Principal BS-20 GCMHS Lakki Marwat	15.09.1960	(Conditionally Retired)
15.	Mr. Fida Muhammad, Ex-Principal BS-20 GCMHS Chitral	12.12.1960	Conditionally Retired)

Deputy Director (Establishment)
Directorate of E&SE
Khyber Pakhtunkhwa, Peshawar
Deputy Director (Estt.)
Elementary & Sec. Education
Khyber Pakhtunkhwa Peshawar.

ATTESTED

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EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 18th MAY, 2021.

PROVINCIAL ASSEMBLY SECRETARIAT
KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 18th May, 2021.

No: PA/Khyber Pakhtunkhwa/Bills-150/2021/7705.— The Khyber Pakhtunkhwa Civil Servants (Amendment) Bill, 2021 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 20th April, 2021 and assented to by the Governor of the Khyber Pakhtunkhwa on 30th April, 2021 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

THE KHYBER PAKHTUNKHWA CIVIL SERVANTS (AMENDMENT) ACT, 2021.
(KHYBER PAKHTUNKHWA ACT NO. XI OF 2021)

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa, (Extraordinary), dated the 18th May, 2021).

**AN
ACT**

Further to amend the Khyber Pakhtunkhwa Civil Servants Act, 1973

WHEREAS it is expedient further to amend the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) in the manner hereafter appearing:

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows:

1. **Short title and commencement.**— (1) This Act may be called the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2021.

(2) It shall come into force from 31st July, 2019.

2. **Substitution of section 13 of the Khyber Pakhtunkhwa Act No. XVIII of 1973.**— In the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), hereinafter referred to as the said Act, for section 13, the following shall be substituted, namely:

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"13. **Retirement from service.**--- (1) A Civil Servant shall retire from service on the completion of sixtieth (60th) year of his age.

(2) A Civil Servant may opt to retire early from service, after completion of twenty five (25) years of qualifying service or attaining the age of fifty five (55) years, whichever is later.

(3) Notwithstanding anything contained in sub-sections (1) and (2), the competent authority may in the public interest, direct that a Civil Servant may retire from service, from such date, as may be determined by the competent authority, after he has completed twenty (20) years of service, qualifying for pension or other retirement benefits, in the manner as may be prescribed:

Provided that no direction under this sub-section shall be made until the Civil Servant has been informed in writing of the grounds on which it is proposed to make the direction, and has been given a reasonable opportunity of showing cause against the said direction.

Explanation.--- In this section, the expression "competent authority" means the appointing authority prescribed in rule 4 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989."

3. **Insertion of section 13A of the Khyber Pakhtunkhwa Act No. XVIII of 1973.** --- In the said Act, after section 13, as so substituted, the following new section shall be inserted, namely:

"13A. **Protection of certain acts.**--- (1) All the Civil Servants, who were conditionally retired from service on or after 31st day of July, 2019 shall, for all intents and purposes, be deemed to have been regularly retired from service on the date of attaining sixtieth (60th) years of age.

(2) Any Civil Servant, who has completed sixty (60) years of age but is not retired from service, by virtue of or in pursuance of the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2019, shall be deemed to have been retired from service from the date when such Civil Servant has completed sixty (60) years of age.

(3) Any salary, allowances and other ancillary benefits received or drawn by such Civil Servant under this section on or after 31st day of July, 2019 shall be deemed to be validly received and drawn."

4. **Repeal.**--- The Khyber Pakhtunkhwa Civil Servants (Amendment) Ordinance, 2021 (Khyber Pakhtunkhwa Ordinance, No. II of 2021), is hereby repealed.

BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(NASRULLAH KHAN KHATTAK)
Secretary
Provincial Assembly of Khyber Pakhtunkhwa

Recd
ESTED

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Khyber Pakhtunkhwa Service Tribunal

APPEAL NO 16425 2020

Diary No. 16962

Dated 28/12/2020

Mr. Muhammad Amin, Principal (BPS-19),
DEO (Teaching Cadre), District Shangla.....



APPELLANT

VERSUS

(17)

- 1- The Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar.
 - 2- The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
 - 3- The Director Elementary & Secondary Education Department, Peshawar.....
- RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTIONS OF THE RESPONDENTS BY NOT PLACING THE NAME OF THE APPELLANT NEXT BELOW THE NAME OF Mr. HANIFULLAH IN THE SENIORITY LIST OF BPS-19 OFFICER OF THE TEACHING CADRE AND NOT CONSIDERING THE APPELLANT FOR PROMOTION TO THE POST OF BPS-20 AND AGAINST THE APPELLATE ORDER DATED 01.12.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON GOOD GROUNDS.

Filed to-day

Registrar
28/12/2020

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 01.12.2020 may very kindly be set aside and respondents be directed to place the name of the appellant below the name of Mr. Hanifullah in the seniority list of 2017 circulated for BPS-19 officers of teaching cadre and the respondents may further please be directed to consider the appellant for promotion to the post of BPS-20 with all back benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

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Registrar
Khyber Pakhtunkhwa Service Tribunal

R/SHEWETH:

FACTS:

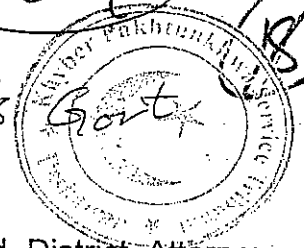
Brief facts giving rise to the present appeal are under:-

- 1- That appellant is the employee of respondent department and is presently serving the respondent Department as Principal BPS-19 quiet efficiently and up to the entire satisfaction of his superiors.

ATTESTED

Order
09.11.2021

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Appeal No. 16425/2020
Muhammad Amin vs



Appellant present through counsel.

Noor Zaman Khan Khattak learned District Attorney alongwith Saleem Khan S.O (Litigation) for official respondents present. Counsel for private respondents present. Arguments heard and record perused.

Vide our judgment of today of this Tribunal passed in Service Appeal No.16425/2020 titled Abdul Hamid Butt, copy of which is placed on file, instant service appeal as preferred by the appellant, is dismissed being not maintainable within meaning of Rule-23 of Khyber Pakhtunkhwa Service Tribunal Rules, 1974. There is no order as to costs. File be consigned to the record room.

Announced.
09.11.2021

(Rozina Rehman)
Member (J)

(Ahmad Sultan Tareen)
Chairman

Date of Presentation of Application 15/11/21
Number of Words 800
Copying Fee 10/-
Total 10/-
Date of Delivery of Copy 22/11/21
Date of Delivery of Copy 22/11/21

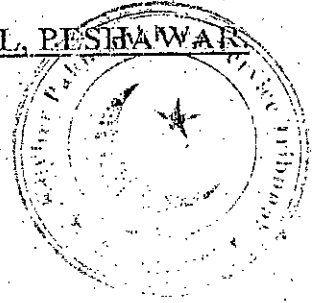
Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Attested

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Annex D

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR



Service Appeal No. 16424/2020

Date of Institution ... 28.12.2020

Date of Decision ... 09.11.2021

Abdul Hamid Butt, Principal (BPS-19), GHS Zaryab Colony, District Peshawar. (Appellant)

VERSUS

The Chief Secretary Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar and two others. (Respondents)

Present:

- NOOR MUHAMMAD KHATTAK, Advocate --- For Appellants.
- NOOR ZAMAN KHAN KHATTAK, District Attorney --- For official respondents.
- ARBAB SAIFUL KAMAL & MUHAMMAD AMIN AYUB Advocates --- For private respondents
- AHMAD SULTAN TAREEN --- CHAIRMAN
- ROZINA REHMAN --- MEMBER (Judicial)

JUDGEMENT

AHMAD SULTAN TAREEN, CHAIRMAN:-Through the above titled appeal described in the heading and four other appeals as enclosed in brackets (Appeal No.16425/2020, 16426/2020, 16427/2020 and 16428/2020) the jurisdiction of this Tribunal has been invoked by the appellants with the prayer as copied below:-

"On acceptance of this appeal, impugned appellate order dated 01.12.2020 may very kindly be set aside and respondents be directed to place the names of the appellants below the name of Mr. HanifUllah in the seniority list of 2017 circulated for BPS-19 officers of teaching cadre and the respondents may further please

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Khyber Pakhtunkhwa Service Tribunal
Peshawar

be directed to consider the appellants for promotion to the post of BPS-20 with all back benefits including seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellants."

2. This judgment shall stand for disposal of all appeals enumerated above in one place, due to their being on one and the same subject against respondents common in all of them.

3. Usually rounding up of the facts for brevity is a useful exercise but the factual account given in the Service Appeal No. 16424/2020 and the copies of the supporting documents annexed therewith reveal about the checkered history of service litigation encompassing the dispute about regularization of appellants' service multiplied by the termination of the appellants from their service followed by their reinstatement with added issues of seniority. Therefore, it is deemed appropriate to copy the factual part of the memorandum of appeal herein below for the purpose of this judgment.

1. That appellant is the employee of respondent department and is presently serving the respondent department as Principal BPS-19 quiet efficiently and up to the entire satisfaction of his superiors.
2. That in 1986 some High Schools of Khyber Pakhtunkhwa were upgraded to higher secondary level by the Government, and the posts of Subject Specialists were created in BPS-17 with criteria that the candidate must be MA in relevant subject with B.Ed, and with five year experience in a Government High School. Till the end of 1987 due to the rigidity in terms and conditions the posts requisitioned by the Department for filling in by the Public Service Commission remained unfilled in the span of two years from 1986 to 1988, only four qualified personnel could be selected, to overcome the situation the Department constituted a committee to rationalize the qualification and experience for the post of Subject Specialist, the committee submitted its report in 1987 recommended that simple Master Degree holder in the relevant subject be appointed and he may be given 5/3 years to acquire the qualification of B.Ed, which was duly approved and notified by the competent authority vide Notification No.SO(S)-6-2/87/II dated 21.11.1991.

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Khyber Pakhtunkhwa
Public Service Commission
Peshawar

3. That in the context of the above recommendation, the appellant was a Master Degree holder applied for the post of Subject Specialists, and after fulfilling all the formalities the appellant was selected vide order dated 05.03.1988 and took charge of the post, dated 08.03.1988 but the respondent Department gave the appellant BPS-15 instead of BPS-17, meanwhile due to the subsequent appointment of Mr. Muhammad Khaliq BPS-17, the appellant was recommended for adjustment against the post of Subject Specialist in Pakistan Studies in the same School vide order dated 19.04.1988. Accordingly, adjustment order dated 26.04.1988 was issued appointing the petitioner as Subject Specialist in Pakistan Studies. The petitioners thereafter remained serving continuously as Subject Specialist BPS-17 till his promotion to BPS-18.

4. That on the same terms and conditions some of the colleagues of the appellant were also appointed as SET/Subject Specialist, and adjusted against the post of Subject Specialist BPS-17. That the appellant alongwith his colleagues filed Writ Petition No.667/1992 for their regularization but the same was subsequently withdrawn with the condition to avail the remedy by way of Departmental appeal to Chief Secretary Government of NWFP vide judgment/order dated 02.03.1993. That after exhausted Departmental appeal the appellant filed Service appeal before the Tribunal i.e. Appeal No.169/1993 which was partially allowed in favor of appellant, as regards the prayer for regularization of service, it is for the department to process the case of selection of the appellants as Subject Specialist, vide judgment dated 31.05.1994.

5. That against the said judgment of Service Tribunal the appellant as well as the Department filed CPLA before the apex Court where the appeal of the Department No.1258/95, was dismissed and the case for the appellants was modified, the petitioners were held entitled for the pay of the post w.e.f the date of their initial appointment, but denied seniority from the said date. That in meanwhile consequent upon the decision of the august Service Tribunal one relevant case of Muhammad Riaz who was granted graded pay in BPS-17 and also allowed him seniority from the date of acquiring the degree of B.Ed vide Notification dated 15.02.1999.

6. That the appellants feeling aggrieved from the discriminatory treatment, filed service appeal before the Service Tribunal in Appeal No.2175/1997 for retrospective seniority but the same was remanded back to the Department to settle the issue of regularization and seniority of the appellants. That it is pertinent to mention that during the pendency of the said appeal move over was also granted to the appellants from BPS-17 to BPS-18.

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 AMNER
 Secretary
 Service Tribunal
 Peshawar

7. That for implementation of the judgment of Service Tribunal, working paper were placed before the Departmental Promotion Committee regarding regularization and seniority and as such minutes of the Departmental Promotion Committee were held on 19.05.2005 in which it was discussed that the regularization of the Subject Specialist in pursuance of the Service Tribunal/Supreme Court of Pakistan does not fall within the purview of DPC thus deprived the appellant for regularization alongwith seniority.
8. That feeling aggrieved the appellant filed Departmental appeal to the Chief Minister for his regularization-cum-seniority on the post of Subject Specialist BPS-17 and with further prayer to stop the respondent department from termination of services of the appellants, summary was submitted to Chief Executive by the Department for regularization of the petitioners though approved by the Chief Executive but astonishingly the appellants had been terminated from service vide order dated 19.03.2008 without assigning any reason.
9. That the appellant feeling aggrieved from the abrupt termination order appealed to Chief Minister for reinstatement into service dated 09.0.2008, followed by Service Appeal No.970/2008 before the Service Tribunal which was allowed in favor of the appellant with the direction to the respondent Department to reinstate the appellants with all backbenefits. That respondent Department sent the proposal for CPLA against the said judgment to Advocate General who opined that it is not fit to go for CPLA and negated the proposal of the respondent Department dated 18.12.2008 and the respondent Department was reluctant to implement the said judgment vide letter dated 12.02.2009 and 25.02.2009. after getting opinion from Advocate General and Law Department: E&SED submitted a summary to Chief Secretary the competent authority for the reinstatement and regularization of the appellants which was approved.
10. That when the respondent Department was reluctant to implement the above mentioned judgment of the Service Tribunal the appellants filed Writ Petition No.381/2009 before the Peshawar High Court for implementation of the decision, resultantly the respondent Department issued reinstatement order of the appellants dated 18th April, 2009.
11. That after regularization and reinstatement into service the appellant filled departmental appeal to the appellate authority vide application dated 12.05.2009 for fixation of seniority in BPS-17 from the date of appointment and in response to appellate authority vide letter date d13.04.2010 directed the Director E&SE to recheck and prepare seniority strictly in accordance with rules, thus the respondents issued the final

NOTED

CHIEF MINISTER

Peshawar
Service Tribunal
Shayzar

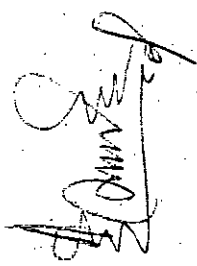
seniority list placing the appellant at Serial No.4 in the seniority list.

12. That resultantly the department issued promotion order date d12th April 2011 whereby the appellants have been promotion from BPS-17 to BPS-18 with the condition that the appellants will be retained inter-se seniority from the date where their erstwhile juniors have been promotion to BPS-18 w.e.f 14.03.1998. That later on, again the matter of seniority arose against which the appellants preferred appeals to the appellate authority dated 11.05.2011 for regaining of his seniority from BPS-18 to BPS-19 to place the name of the appellants at correct position and the respondent department forwarded the letter dated 28th June, 2011 to Secretary Establishment in response of which, order dated 06.09.2011 has been issued whereby the appellants had regain the seniority w.e.f 14.03.1998.

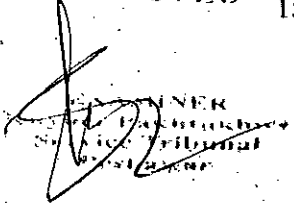
13. That the appellants after that made correspondence with the respondent Department for placing their names at proper place in the seniority list of BPS-18 before issuing the final seniority list and finally placed the names of the appellants at correct positions by issuing final seniority list dated 01.01.2014 and as such placing the names of the appellants at Serial No4. Accordingly, working paper for promotion to BPS-19 was submitted by the Department to Provincial Selection Board in 2014, here it is important to note that the President School Officers Association Mr. Haji Nisar Muhammad BPS-19 alongwith representatives from the Cadre of BPS-18, 19 & 20 filed appeals against the appellants and their colleagues for quowarranto which was dismissed in limine by the Peshawar High Court dated 5th March, 2014 and after dismissal of the writ petition filed by Haji Muhammad Nisar in Peshawar High Court the petitioner was considered for promotion to BPS-19 vide order date d21.04.2019.

14. That once again, the matter of seniority raised against which the appellant preferred departmental appeal to the appellate authority for regaining the seniority under promotion police 2009 with their erstwhile juniors in BPS-19 for promotion to BPS-20 vide appeal dated 2nd May, 2014, similarly correspondence was made by E&SE Department with Establishment Department for seeking advice in the matter vide letter dated 07.08.2014 and 03.09.2014, 16.09.2014 issued letter dated 16th November, 2015 whereby ordered to place the names of the appellants at proper place in the seniority list of BPS-19 and seniority be finalized, order was followed by placing the appellants in the final seniority list dated 31.12.2.015.

15. That working paper for promotion to BPS-20 was submitted by the department to Provincial Selection Board, Meanwhile, the above mentioned notification was challenged by one Mr. HanifUllah and others in the august Service Tribunal and as



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such his appeal has been accepted vide judgment dated 11.09.2017. That the appellants knocked the door of the apex court against the said decision of the Service Tribunal but didn't succeed. That the name of appellant was dropped from promotion panel, where-after, the respondents placed the name of Mr. HanifUllah at the top of the seniority list dated 27.11.2017 and appellants are thrown back to the bottom of the seniority list against the spirit of judgment.

16. That in result, the names of the appellants were ignored from promotion to BPS-20. That the respondents recently circulated seniority list for the year 2019 but again the appellants have been pushed to the bottom of the said seniority list on malafide basis. That the appellants feeling aggrieved, preferred departmental appeal to the appellate authority vide dated 28.09.2020 but the same has been rejected on no good grounds vide order dated 01.12.2020.

4. The appeals initially were preferred with impleadment of official respondents only, who on attending the proceedings, filed their written reply/commentson 07.06.2021 as evident from order sheet of the similar date. On the same day, an application was submitted on behalf of applicants subsequently impleaded as private respondents vide order dated 02.07.2021 in pursuance to no objection on behalf of the appellants. The private respondents also submitted their reply/comments raising several legal and factual objections. The pertinent objection among preliminary objections of the private respondents is that the matter has already been decided up to Hon'ble Apex Court as is evident from Para-16 and Page-165 of the Service Appeal; therefore, as per Section-11 of C.P.C read with Rule-23 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974, the appeal is liable to be dismissed.

5. We have heard the arguments and perused the record.

6. The learned counsel for the appellants though very impressively argued the case in line with the facts of the appeals as copied herein above from Appeal No.16424/2020. If visualized through prayer in appeal of Mr. HanifUllah, he succeeded to persuade us that notwithstanding the recasting

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WITNESSED
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of the seniority list in pursuance to the judgment of this Tribunal in his case, the appellants were supposed to lose the seniority only against him i.e. Mr. HanifUllah. Learned counsel pointed out that if the said judgment is perceived with reference to prayer of the appellant Mr. HanifUllah, he prayed that the impugned final seniority list of (Male) Teaching Cadre (BPS-19) issued vide Notification dated 26.04.2016. may graciously be modified by placing the name of the appellant above the names of respondent No.4 to 14 (present appellants) in the seniority list. However, the appellants' seniority stood altered beyond the said scope bringing them even below the private respondents. Nevertheless our persuasion with the arguments of learned counsel for the appellants, we could not find a convincing response on his behalf in relation to the preliminary objection of private respondents on the point of *resjudicata* with particular reference to the judgment dated 11.09.2017 passed in Service Appeal No.803/2016 titled *HanifUllah Vs. The Government of Khyber Pakhtunkhwa & other*. Because, there is a peripheral discussion in the conclusion part of the said judgment relating to appointment of the appellants, their termination from service and then reinstatement and was culminated with an independent operative part vide Para-10 of the said judgment as copied below:

“The upshot of the above discussion is that impugned seniority list was firmed up is blatant violation of Section-8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, hence, it is illegal, perverse, against the norms of justice and not sustainable in the eyes of law/rules.”

7. The appeal of Mr. HanifUllah was accepted without reference to his prayer and the impugned seniority list notified vide Notification dated 24.04.2016 was set aside.

8. The present appellants challenged the judgment dated 11.09.2017 in service appeal of Mr. HanifUllah through CPLA No.4591 to 4594 of 2017.

ATTESTED

The august Supreme Court of Pakistan vide order dated 02.10.2019 dismissed the petitions and leave was refused with the observations that the Service Tribunal is the highest forum for the purpose of determination of facts and only a substantial question of law of public importance arising out of the case can be taken up by this court. It was further observed that no such question is involved in the instant petitions.

9: Needless to say that the present appeals are meant for the relief in the manner that the respondents may be directed to place the name of the appellants below the name of Mr. HanifUllah in the seniority list of 2017 circulated for BPS-19 officers of Teaching Cadre. Obviously, the success of further prayer for relief is dependent upon the correction of the seniority list as prayed for. The operative part of the judgment dated 11.09.2017 in Mr. HanifUllah's case, encapsulated in Para-10 of the said judgment copied above, left no scope for restoration of the position of the appellants in seniority list for the year 2017 when it was held to have been firmed up in blatant violation of Section-8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and further held as illegal, perverse, against the norms of justice and not sustainable in the eyes of law/rules. So, recourse of the appellants through present appeals for determination in relation to the seniority list for the year 2017 is not workable in view of the effect of the judgment dated 11.09.2017 in Mr. HanifUllah's case. Rule-23 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 provides that no Tribunal shall entertain any appeal in which the matter directly and substantially in issue has already been finally decided by a court or a Tribunal of competent jurisdiction. Obviously, the matter in issue in Mr. HanifUllah's appeal was the seniority list for the year 2017

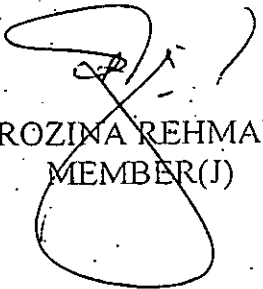
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ATTESTED

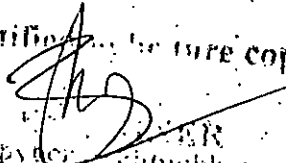
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SCANNER
OF THE
Service Tribunal
Peshawar

between him and the appellants; and decision of the Tribunal dated 11.09.2017 in relation to said appeal has become final after dismissal of the civil petition by the august Supreme Court of Pakistan filed by the appellants against the said judgment. So, the appeals at hand are hit by the principle of res-judicata contained in Rule-23 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974. Therefore, all the appeals as preferred by the appellants and enumerated above are dismissed being not maintainable within meaning of Rule-23 ibid. Copy of this judgment be placed on all other files of the appeals. There is no order as to costs. File be consigned to the record room.

ANNOUNCED
09.11.2021


(ROZINA REHMAN)
MEMBER(J)


(AHMAD SULTAN TAREEN)
CHAIRMAN

Certified true copy

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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44

Alex E

(25)

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

No. 6053 / 11 No

Dated Peshawar the 14 / 12 / 2021

The Section Officer (Schools Male)
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

**SUBMISSION OF WORKING PAPERS FOR PROMOTION OF OFFICERS
BS-19 TO BS-20 (TEACHING CADRE) MEN SECTION AS PER REQUEST
OF SCHOOL OFFICERS ASSOCIATION (SOA) FOR PLACING BEFORE
THE FORTHCOMING PSB MEETING.**

Memorandum

I am directed to refer to the subject cited above and state that file regarding Working Papers of the above mentioned Officers is hereby submitted to be placed before the forthcoming PSB Meeting accordingly.

Here, it is worth mentioning that the seniority list, affixed in the file is as stood on 31-12-2019, issued on 08-12-2020, which was subjudiced till 15-11-2021.

On 09-11-2021 the Hon'ble court decided the case and order sheet of the same was obtained on 15-11-2021 (Copy attached).

Hence, the file is hereby submitted for perusal and further necessary action, please.

Encl: As above.

Deputy Director (Estab Male-II)
Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar

[Handwritten signature]
14/12/21

Copy forwarded to the:-

P.A. to Director (E&SE) Local Directorate.

Deputy Director (Estab Male-II)
Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa Peshawar

SOA

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Alex

No. 980 /

(45)

Dated: 27/12/2021.

The Honorable Chief Secretary to Govt of Khyber Pakhtunkhwa
Peshawar.

o/c
28-12-21

Subject: **REQUEST FOR PROMOTION BY CIRCULATION FROM BS-19 TO BS-20 (TEACHING CADRE)**

Respected Sir,

Ans¹ F¹
(26)

With profound veneration, it is submitted that I have been working as Principal BS-19 since 05-01-2009. Our promotion case from BS-19 to BS-20 was submitted to PSB on 30-12-2020, but the Provincial Selection Board did not consider promotion of our Ten officers due to CPLA filed by the provincial government in the case of age of superannuation retirement.

Meanwhile our Final Seniority was challenged in the Honorable Khyber Pakhtunkhwa Services Tribunal Peshawar and our promotion case could not be submitted to PSB held on 30-07-2021 & 31-07-2021.

The said appeal was dismissed by Honorable Services Tribunal on 09-11-2021 and our seniority stands undisputed. Due to short call, once again our promotion case could not be submitted to the PSB, which recently held on 02-12-2021.

Sir,

Our promotion case has been delayed for more than one year due to litigation process and thus, we have been deprived of our due right of promotion for three times.

Sir,

I am proceeding on superannuation retirement on 01-02-2022 and my working papers for promotion along with other officers to BS-20 have been submitted to the Section Officer PSB of Establishment Department vide SO(SM) E&SE D /3-3/2021 promotion BS-19 to BS-20 dated: Peshawar 23-12-2021.

It is therefore humbly requested that I may kindly be considered for promoted from BS-19 to BS-20 by circulation before my retirement on 01-02-2022.

Thanking you in anticipation please.

Yours obediently,

Muhammad Salim

Muhammad Salim
Principal (BS-19)

GSSNCMHS NO:1 Tank

Copy to:

1. The Section Office, PSB Establishment Department Govt of Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary, Establishment Department Khyber Pakhtunkhwa, Peshawar.
3. PS to Secretary, Elementary and Secondary Education Department, Peshawar.

de
ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

46

SO/SM/ES/SED/03/2021/Promotion ES-19 to ES-20
Dated Peshawar the December 23, 2021

The Section Officer, PSS

Ans ¹⁵
27



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

SO/SM/ES/SED/03/2021/Promotion ES-19 to ES-20
Dated Peshawar the December 23, 2021

The Section Officer, PSS
Establishment Department
Government of Khyber Pakhtunkhwa

15

WORKING PAPER FOR PROMOTION OF OFFICERS FROM ES-19 TO ES-20 TEACHING CADRE ON REGULAR BASIS

am directed to refer to the subject noted above and to issue the
sets of working papers alongwith relevant documents to the officers of grade
ES-19 to ES-20 on regular basis of Elementary & Secondary Education Department
for being before the Provincial Selection Board for consideration and issue

Enc. As Above:

MAILED
INAFEEZ UR REHMAN SHAH
SECTION OFFICER (SCHOOLS MALE)

Encl. Even No. & Date:

Copy forwarded to the
Director, ESSE Khyber Pakhtunkhwa
PS to Secretary, ESSE Department, Peshawar
SCHOOLS MALE

47

BETTER COPY OF THE PAGE NO.
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

27/A

SO(SM) E&SEd/3-3/2021/Promotion BS-19 to 20 To
Dated Peshawar the December 23, 2021

To,

The Section Officer (PSB)
Establishment Department
Government of Khyber Pakhtunkhwa.

Subject: **WORKING PAPER FOR PROMOTION OF OTHERS**
FROM BS-19 TO BS-20 TEACHING CADRE ON
REGULAR BASIS

I am directed to refer to the subject noted above and forward DIT sets of working papers along with relative documents for promote of officer from BS-19 to BS-20 on regular basis of Elementary & Secondary Education Department for ----- before the Provincial Selection Board for consideration please.

ENCT. AS ABOVE

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER SCHOOL MALE

Endst: Even No. & Date.

Copy forwarded to the-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.

[Signature]
ATTESTED

48

12/2021

PSB-I

WORKING PAPER FOR PROVINCIAL SELECTION BOARD

DEPARTMENT: ELEMENTARY & SECONDARY EDUCATION, GOVT OF KHYBER PAKHTUN KHAWA.

28

- i. Nomenclature of the post/Basic Scale. Principal Regional Institute for Teacher Education/Director Provincial Institute for Teacher Education (PITE)/Principal Govt: high & Higher Secondary School BS-20 (Male)
- ii. Service/Group/Cadre: Provincial Education Services group BS-19 Officers of Teaching Cadre (Men's Section)
- iii. Sanctioned strength of the Cadre Total Sanctioned post in BS-20 of Teaching Cadre = 38 (Annexure-A)

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	Direct	Promotion	Transfer
i Percentage of Share		100%	
ii No. of posts allocated to each category		38	
iii Present Occupancy		22 posts have occupied by regular BS-20 Officers (Annexure-B)	
iv No. of Vacancies in each category		16 Posts	

v. How did the vacancy (ies) under promotion quota occurred and since when? Post vacant due to the retirement of Officers in BS-20 = 14(Annexure-C; however 2 officers conditionally retired in BS-20(Annexure-D)

vi. Recruitment Rules Notification. No.SO(G)E&SED/I-28/2003/Vol-II dated 09.04.2004 & 04.05.2009 (Annexure E)


- a) By selection on merit from amongst Principals High School/High Secondary School/Comprehensive High School/Regional Institute of Teacher Education and other equivalent ant regular post in BS-19 IN Teaching Cadre with 17 Years service in BS-17 & Above or 12 Years service in BS-18 & Above or 05 Years service in BS-19 in Teaching Cadre or (Annexure E)
- b) By transfer of an Officer of the School Management Cadre

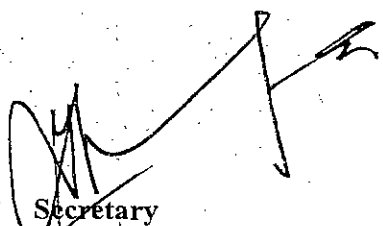
vii. Required length of service. 17 Years service in (BS-17 & above) or 12 years service in (BS-18 & above) or 05 years service in (BS-19)

viii. Whether to be promoted on regular basis or appointment on acting charge basis? 14 Vacancies will be filled on regular basis

ix. Mandatory training, if any. N.A

x. Minimum required score on EI. 70


Director
 Elementary & Secondary Education
 Pakhtunkhwa Peshawar


Secretary
 Government of Khyber Pakhtunkhwa Khyber
 Elementary & Secondary Education
 Government of Khyber Pakhtunkhwa

ATTESTED

PANEL OF OFFICERS FOR CONSIDERATION

PSB-II

S#	Sen No.	Name of Officer with qualification	Date of Birth	Date of 1 st entry into Govt Service	Date of Appt./ Promotion to BS-17	Date of regular appoint/ promotion to BS-18	Date of regular Appointment/ Promtion to the present scale in BS-19	Whether fulfill the prescribed length of service	Quantified scores	Missing PERs (if any)	Disciplinary proceeding (if any)	Case (if any) in any court of Law including NAB/plea bargaining with NAB	Mandatory training for promotion	Research papers	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	6	Muhammad Bashir	05.04.1963	22.01.1991	22.10.1991	09.02.2004	13.06.2012	yes	53	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
2	7	Mir Daud Khan	03.02.1964	22.10.1991	22.10.1991	09.02.2004	13.06.2012	yes	53	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
3	8	Riasat Khan	13.03.1962	13.10.1985	22.10.1991	09.02.2004	13.06.2012	yes	56	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
4	9	Sikander Sher	10.03.1962	15.05.1987	22.10.1991	09.02.2004	13.06.2012	yes	54	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
5	11	Raj Muhammad Khan	13.01.1962	17.02.1992	17.02.1992	09.02.2004	13.06.2012	yes	57	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
6	12	Muhammad Salim	02.02.1962	11.11.1987	22.10.1991	09.02.2004	13.06.2012	yes	54	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
7	14	Abdul Haleem	16.07.1962	23.02.1984	22.10.1992	09.02.2004	13.06.2012	yes	53	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
8	15	Zaheer Ahmed	13.11.1962	22.10.1991	22.10.1991	09.02.2004	13.06.2012	yes	54	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
9	16	Riaz Ahmed Bahar	07.01.1964	22.10.1991	22.10.1991	09.02.2004	13.06.2012	yes	57	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
10	18	Muhammad Iqbal	05.02.1962	22.10.1991	22.10.1991	09.02.2004	13.06.2012	yes	52	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
11	19	Saif Ullah	02.05.1962	13.02.1988	22.10.1991	09.02.2004	13.06.2012	yes	51	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
12	20	Nisar Muhammad	10.03.1963	14.11.1990	22.10.1991	09.02.2004	13.06.2012	yes	58	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis

ATTACHED

8

S#	Sen No.	Name of Officer with qualification	Date of Birth	Date of 1 st entry into Govt Service	Date of Apptt./ Promotion to BS-17	Date of regular appoint/ promotion to BS-18	Date of regular Appointment/ Promotion to the present scale in BS-19	Whether fulfill the prescribed length of service	Quantified scores	Missing PERs	Disciplinary proceeding	Case (if any) in any court of Law including NAB/plea bargaining with NAB	Mandatory training for promotion	Research papers	Remarks
										(if any)	(if any)				
25	35	Hamid Ullah Jan	12.10.1964	17.03.1993	17.03.1993	09.02.2004	21.04.2014	yes	57. with The remarks that PER for the year 2020 has not been provided	No	No	No	post promotion training	No	Not Eligible
26	36	Bakht Zada	11.09.1962	26.09.1992	26.09.1992	09.02.2004	21.04.2014	yes	33. with The remarks that PER for the year 2013, 2016-2020 has not been provided	No	No	No	post promotion training	No	Not Eligible
27	37	Saeed Ullah Jan	25.04.1967	26.09.1992	26.09.1992	09.02.2004	09.02.2004	yes	57	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
28	38	Bakhtiar Ahmad	13-04-67	26.09.1992	26.09.1992	09.02.2004	09.02.2004	yes	54	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis
29	39	Muhammad Umer	07-09-65	25-01-93	25-01-93	09.02.2004	09.02.2004	yes	53	No	No	No	post promotion training	No	Eligible for Promotion from BS-19 to BS-20 on regular basis

CERTIFICATE:-

Certified that the officers included in the panel are eligible for promotion in all respect except serial No.25 & 26 due to non-availability of PERs.

[Signature]
Director

Directorate of Elementary and Secondary
Education Khyber Pakhtunkhwa Peshawar.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Signature :

Designation :

Date :

[Signature]
17/12/2024

SECRETARY
Elementary and Secondary Education
Govt of Khyber Pakhtunkhwa

**PER GRADING AND QUANTIFICATION FORM FOR REGULAR PROMOTION TO BS-20
IN RESPECT OF Mr. SIKANDAR SHER (DOB 10.03.1962)**

Seniority No.09

Year	Period of PER		Pen Picture		PERs Assessment	Fitness for Promotion	Score	
	From	To	Reporting Officer	Countersigning Officer				
Previous Scale (BP-17)								
1992	1.1.1992	31.12.1992	Devoted to his duty		Agreed.	Good	Fit	7
1993	1.1.1993	31.12.1993	Devoted to his duty		Agreed.	Good	Fit	7
1994	1.1.1994	31.12.1994	Punctual and a hardworking teacher		Agreed.	Good	Fit	7
1995	1.1.1995	31.12.1995	Healthy in treatment constructive		Agreed.	Good	Fit	7
1996	1.1.1996	31.12.1996	A devoted teacher		Agreed.	Good	Fit	7
1997	1.1.1997	31.12.1997	He is good and regular		Agreed.	Good	Fit	7
1998	1.1.1998	31.12.1998	He is honest and hardworking teacher		Agreed.	Good	Fit	7
1999	1.1.1999	31.12.1999	Honest and efficient		Agreed.	Good	Fit	7
2000	1.1.2000	31.12.2000	Dutiful and efficient		Agreed.	Good	Fit	7
2001	1.1.2001	31.12.2001	Dutiful and efficient		Agreed.	Good	Fit	7
2002	1.1.2002	31.12.2002	Dutiful and efficient		Agreed.	Good	Fit	7
2003	1.1.2003	31.12.2003	Highly enthusiastic, punctual, martinet and straight forwarded officer		Agreed.	V.good	Fit	10
								87
Previous Scale (BP-18)								
2004	1.1.2004	31-12-2004	Active and energetic officer.		Agreed	V. good	Fit	10
2005	1.1.2005	31-12-2005	He is eminent and vigilant officer		Agreed	V. good	Fit	10
2006	1.1.2006	31-12-2006	He is a responsible officer		Agreed	V. good	Fit	10
2007	1.1.2007	31-12-2007	Good		Agreed	V. good	Fit	10
2008	1.1.2008	31-12-2008	Having full confidence over his job.		Agreed	V. good	Fit	8
2009	1.1.2009	31-12-2009	Alert and highly responsible officer.		Agreed	V. Good	Fit	8
2010	1.1.2010	31-12-2010	Dependable subordinate.		Agreed	V. Good	Fit	8
2011	1.1.2011	31-12-2011	The officer an work in challenging post situation. He is emotionally stable having good communication skill. He has sufficient knowledge of isla.		Agreed	V.good	Fit	8
								72
Present Scale (BP-19)								
2012	1.1.12	31.12.12	The officer remained dutiful punctual and efficient during the period of report.		Agreed	Good	Fit	7

Section Officer (P)
Elementary & Secondary
Education Department (R.P.)

ATTENDED

**PER GRADING AND QUANTIFICATION FORM FOR REGULAR PROMOTION TO BS-20
IN RESPECT OF Mr. SIKANDAR SHER (DOB 10.03.1962)
Seniority No.09**

2013	1.1.13	31.12.13	The officer has a very high temper. He remained dutiful and loyal to his duties during the period of report. He never hesitated to work according to the rules and regulations in extreme pressure.	Agreed	Good	Fit	7
2014	1.1.14	31.12.14	The officer remained dutiful punctual and efficient during the period of report.	Agreed	Good	Fit	7
2015	1.1.15	31.12.15	The officer has a very high temper. He remained dutiful and loyal to his duties during the period of report. He never hesitated to work according to the rules and regulations in extreme pressure.	Agreed	Good	Fit	7
2016	1.1.16	31.12.16	The officer remained dutiful punctual and efficient during the period of report.	Agreed	Good	Fit	7
2017	1.1.17	31.12.17	The officer has a very high temper. He remained dutiful and loyal to his duties during the period of report. He never hesitated to work according to the rules and regulations in extreme pressure.	Agreed	Good	Fit	7
2018	01.01.2018	31.12.2018	Cooperative and hardworking know his job well	Agreed	Good	Fit	7
2019	01.01.2019	31.12.2019	Cooperative committed and hardworking	Agreed	V. Good	Fit	8
2020	01.01.2020	31.12.2020	Cooperative and supportive	Agreed	V.good	Fit	8
							65

Comprehensive efficiency index

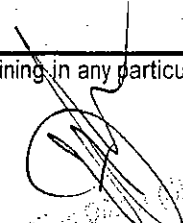
PERs Quantified Score 50:30:20@ 70%	Basic Scale	Aggregate Score	Weightage Factor	Points Obtained
	Present Scale	7	36	30
	Previous Scale(B)	9	27	23
	Previous Scale(A)	7	15	
	(i) Additions*			
	(ii) Deletions**			
	Total C5+B3+A2		23	

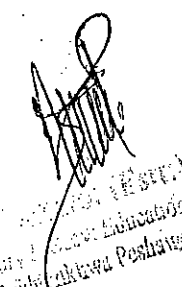
Evaluation by the PSB out of 30 marks

G.Total

Required threshold on CEI for promotion to BP-20 is 70

- * 2 marks shall be added for serving in a government training institution including those meant for specialized training in any particular cadre for a period of 2 years or more
- ** 5, 3 & 1 marks shall be deducted for each major, minor penalty and adverse remarks respectively.


 Mr. Sikandar Sher
 Elementary Education Officer
 Education Department (G)


 Mr. Sikandar Sher
 Deputy Director (Elementary Education)
 Khyber Pakhtunkhwa Peshawar

ATTENDED

53

33 12/2021

PSE-V 15

SENIORITY LIST OF PRINCIPALS BS-19 MALE E&SED Khyber Pakhtunkhwa (Teaching Cadre)

S.#	Name of Officer with Designation	Qualif:	D/O Birth	Domicile	Date of 1 st Entry in Edu;	Date of Present posting	BS	Method of Recruit	Remarks
1	Sher Nawaz Pri: GHS Landiwah Lakki Marwat	M.A M.Ed	15/03/1965	Bannu	22/10/1999	13/06/2012	19		Promoted to BS-20
2	Muhammad Ashraf Deputy Director FITE	M.Sc M.Ed	03/05/1961	Kohat	13/09/1990	13/06/2012	19	By Promotion	Promoted to BS-20 & Retired
3	Nazim ud Din Principal RITE (M) Darosh Chitral	M.A M.Ed	01/04/1964	Chitral	24/12/1989	13/06/2012	19	By Promotion	Promoted to BS-20
4	Munawar Gul Pri: GHSS Tamab Farm Peshawar	M.A M.Ed	15/03/1962	Bannu	31/10/1981	13/06/2012	19	By Promotion	Promoted to BS-20
5	Mo'in ud Din Principal GHSS Shakar Dara	M.Phil.Ed	01/01/1961	Karak	30/09/1987	13/06/2012	19	By Promotion	Promoted to BS-20 & Retired
6	Muhammad Bashir Pri: GHS Kalo Khan Swabi	M.Sc B.Ed	05/04/1963	Swabi	22/01/1991	13/06/2012	19	By Promotion	
7	Mir Daud Khan Pri: GHSS Nazim Nasib	M.A B.Ed	03/02/1964	Bannu	22/10/1991	13/06/2012	19	By Promotion	
8	Riasat Khan Principal GCMHS Torbala	M.Sc B.Ed	13/03/1962	Abbottabad	13/10/1985	13/06/2012	19	By Promotion	
9	Sikandar Sher Pri: GHSS Mansabdar Swabi	M.A M.Ed	10/03/1962	Swabi	15/05/1987	13/06/2012	19	By Promotion	
10	Neik Nawaz Khan Sec BISE Bannu	M.A B.Ed	08/09/1961	Bannu	22/03/1992	13/06/2012	19	By Promotion	Retired
11	Raj Muhammad Khan Secretary BISE DI Khan	M.Sc M.Ed	13/01/1962	Nowshera	17/02/1992	13/06/2012	19	By Promotion	
12	Muhammad Salim Pri: GSSNCMHS No.1 Tank	M.A M.Ed	02/02/1962	D.I.Khan	11/11/1987	13/06/2012	19	By Promotion	
13	Hussam ul Haq Pri: GHS no.3 Kohat	M.A M.Ed	01/01/1961	Kohat	11/02/1982	13/06/2012	19	By Promotion	Retired
14	Abdul Halim Pri: GHS Jehangiri Karak	M.Sc M.Ed	16/07/1962	Karak	23/02/1984	13/06/2012	19	By Promotion	
15	Zaheer Ahmad Pri: GSMHHS Taru Jabba	M.Sc M.Ed	13/11/1962	Bannu	22/10/1991	13/06/2012	19	By Promotion	
16	Riaz Ahmad Bahar Pri: GHS Civil Quarter	M.Sc M.Ed	07/01/1964	Peshawar	22/10/1991	13/06/2012	19	By Promotion	
17	Mir Laiq Pri: GHSS Hakim Barat Bannu	M.A B.Ed	03/08/1961	Bannu	05/10/1987	13/06/2012	19	By Promotion	Retired
18	Muhammad Iqbal Pri:GHS Badber	M.A M.Ed	06/02/1962	Kohat	22/10/1991	13/06/2012	19	By Promotion	
19	Saif Ullah Pri: GHSS Kot Kashmir Lakki	M.A B.Ed	02/08/1962	Bannu	13/02/1988	13/06/2012	19	By Promotion	
20	Nisar Muhammad DEO(M) Mansehra	M.Sc M.Ed	10/03/1963	Peshawar	14/11/1990	13/06/2012	19	By Promotion	
21	Taj Muhammad Pri: GHS Tur Dher No.1 Swabi	M.A M.Ed	31/12/1963	Mohmand Agency	19/03/1992	13/06/2012	19	By Promotion	
22	Hafiz Muhammad Rauf Pri: GHS Bazar Ahmad	M.A B.Ed	10/11/1963	Bannu	19/04/1988	13/06/2012	19	By Promotion	
23	Lutfuer Rahman Pri: GHSS labour Colony	M.A B.Ed	18/11/1963	Nowshera	30/12/1990	13/06/2012	19	By Promotion	
24	Muhammad Ajmal Pri: GHSS Takkar Mardan	M.Sc B.Ed	10/12/1961	Mardan	20/11/1986	13/06/2012	19	By Promotion	
25	Abdul Aziz Pri: GHS No.1 Abbatt Abad	M.A M.Ed	23/02/1961	Bannu	23/02/1983	13/06/2012	19	By Promotion	Retired
26	Muhammad Nazir Pri: GHSS Shinkiarl	M.Sc B.Ed	20/01/1963	Mansehra	11/08/1987	13/06/2012	19	By Promotion	
27	Muhammad Sharif Pri: GHS Kota Swabi	M.Sc M.Ed	02/06/1964	Swat	26/09/1992	13/06/2012	19	By Promotion	
28	Muhammad Mutahir Member Text Book	M.A M.Ed	22/03/1966	Swabi	26/09/1992	13/06/2012	19	By Promotion	
29	Ajmair Shah Pri: GHS No.i Nowshera kalan	M.A B.Ed	20/09/1967	Nowshera	26/09/1992	13/06/2012	19	By Promotion	
30	Waqar Ali Pri: GHSS Dosehra Charsadda	M.A M.Ed	06/05/1970	Nowshera	28/08/1992	13/06/2012	19	By Promotion	
31	Wall Khan Pri: GHS khujaki Killa Karak	M.Sc M.Ed	09/04/1969	Karak	26/09/1992	13/06/2012	19	By Promotion	
32	Munawar Khan Pri: GHS Gul Bela Peshawar	M.Sc B.Ed	24/01/1968	Bannu	26/09/1992	13/06/2012	19	By Promotion	
33	Syed Tajam ul Shah Pri: GHSS Manki Sharif	M.A B.Ed	28/01/1965	Nowshera	12/02/1988	13/06/2012	19	By Promotion	
34	Muhammad Hanif Pri: GHSS Kachi Palnd Khan	M.Sc B.Ed	21/10/1966	D.I.Khan	26/09/1992	21/04/2014	19	By Promotion	
35	Hamid Ullah Jan Controller of	M.Phil M.Ed	12/10/1964	Lakki	17/03/1993	21/04/2014	19	By Promotion	
36	Bakht Zada Pri: GHS Puran Shangla	M.A B.Ed	11/09/1962	Swat	28/09/1992	21/04/2014	19	By Promotion	
37	Saeed Ullah Jan Pri: GHSS Gardai Bajour	M.Sc B.Ed	25/04/1967	Bajaur Agency	28/09/1992	21/04/2014	19	By Promotion	
38	Bakhtiar Ahmad Secretary BISE	M.A B.Ed	13/04/1967	Nowshera	26/09/1992	21/04/2014	19	By Promotion	

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SENIORITY LIST OF PRINCIPALS BS-19 MALE E&SED Khyber Pakhtunkhwa (Teaching Cadre)

39	Muhamad Umar Pri: GHS No.3 Lakki	M.A B.Ed	07/09/1965	Lakki	25/01/1993	21/04/2014	19	By Promotion
40	Said Jamil Sr.Instructor RITE Mardan	M.A B.Ed	09/01/1963	Mardan	18/02/1993	21/04/2014	19	By Promotion
41	Fazal Subhan Pri: GHSS Sufaid Sung Peshawar	M.A B.Ed	14/11/1965	Charsadda	28/09/1992	21/04/2014	19	By Promotion
42	Aman Ullah Sr. Instructor RITE	M.Sc B.Ed	01/12/1965	Bannu	30/09/1992	21/04/2014	19	By Promotion
43	Kifayat Ullah Sr.Instructor RITE	M.Sc B.Ed	05/07/1968	Bannu	28/09/1992	21/04/2014	19	By Promotion
44	Amjid Ali Pri: GHS Sheikhu Bandi Abbott	M.Sc B.Ed	05/04/1968	Mansehra	17/03/1993	21/04/2014	19	By Promotion
45	Muhammad Majid Sabir Pri: GTHSS Gul Bahar	M.Sc B.Ed	13/09/1966	Peshawar	30/09/1992	21/04/2014	19	By Promotion
46	Amir nawaz Pri GHS Teri Karak	M.Sc B.Ed	15/08/1968	Karak	26/09/1992	21/04/2014	19	By Promotion
47	Khurshid Ali Pri: GHS Tindo Dag swat	M.A B.Ed	03/04/1966	Swat	20/03/1993	21/04/2014	19	By Promotion
48	Dr. Muhammad Nasir Pri: GHS No.2 Nowshera	M.A M.Ed. Ph.D	04/04/1966	Nowshera	31/08/1991	21/04/2014	19	By Promotion
49	Sharif Gul Pri: GHSS No.2 Peshawar Cantt	M.Sc B.Ed	29/08/1965	Nowshera	14/04/1993	21/04/2014	19	By Promotion
50	Ifrikhar Ahmad Principal GHS Aza Khel Bala	M/Sc/ M/Ed	14/08/1964	Peshawar	28/09/1992	2/9/2004	19	By Promotion
51	Bahadar ali Khan Pri: GHS Ambadhar	M.Sc B.Ed	03/04/1966	Charsadda	20/11/1990	21/04/2014	19	By Promotion
52	Farid Ullah Khan Pri: GHSS Khanispur Abbott	M.Sc B.Ed	10/01/1967	Bannu	28/09/1992	21/04/2014	19	By Promotion
53	Saeed ur Rahman Pri:GHSS Shergar h	M.A B.Ed	04/04/1964	Mansehra	21/10/1992	21/04/2014	19	By Promotion
54	Wajid Iqbal Pri: GHS Baffa Mansehra	M.A B.Ed	15/06/1965	Mansehra	18/08/1992	18/11/2015	19	By Promotion
55	Muhamad Tariq Pri: GHSS chaghar Matti	M.A B.Ed	25/04/1964	Charsadda	10/01/1993	21/04/2014	19	By Promotion
56	Aminul Haq Pri: GHSS Ziarat Talash Dir Lower	M.Sc B.Ed	03/03/1965	Dir Lower	27/09/1992	21/04/2014	19	By Promotion
57	Jadoon Khan V/P GCET Jamrud Khyber Agency	M.Sc B.Ed	07/04/1965	Bannu	08/01/1991	21/04/2014	19	By Promotion
58	Abdul Hamid Pri: GHS Porshal Kohat	M.A M.Ed	11/11/1962	Karak	25/04/1991	21/04/2014	19	By Promotion
59	Haidor Hussain Pri: GHSS Gujar Ghari	M.Sc B.Ed	04/04/1964	Swabi	26/09/1992	21/04/2014	19	By Promotion
60	Mujahid Shah Sr.Instructor RITE male	M.Sc B.Ed	26/03/1966	Mardan	01/01/1992	21/04/2014	19	By Promotion
61	Nisar Muhammad Pri: GHS Bicket Gunj No.1	M.Sc B.Ed	15/01/1965	Mardan	26/09/1992	21/04/2014	19	By Promotion
62	Ibrahim Pri: GHSS Barikot Swat	M.Sc B.Ed	04/04/1965	Swat	26/09/1992	21/04/2014	19	By Promotion
63	Alamgir Pri: GHS hathlan Mardan	M.Phil M.Ed	01/04/1966	Dir	22/03/1993	21/04/2014	19	By Promotion
64	Ijaz Ali Khan CIDA Project KPK Peshawar	M.Sc B.Ed	19/01/1966	Bannu	17/03/1993	21/04/2014	19	By Promotion
65	Sher Rahman Pri: GHS Ziarat Kaka Sahib	M.A B.Ed	01/09/1962	Nowshera	05/10/1989	21/04/2014	19	By Promotion
66	Muhammad Iltaf Pri:GHSS Tugh Bala	M.A B.Ed	12/12/1962	Kohat	07/03/1989	21/04/2014	19	By Promotion
67	Shah Hussain Sr.Instructor RITE Male	M.Sc B.Ed	01/09/1964	Kohat	28/09/1992	21/04/2014	19	By Promotion
68	Abdul Hakeem Khan Pri: GHS Nakband Kohat	M.Sc B.Ed	07/11/1967	Bannu	01/10/1992	21/04/2014	19	By Promotion
69	Muhammad Nadeem Pri: GHS Kot Jol D.I.Khan	M.Sc B.Ed	26/02/1968	D.I.Khan	29/09/1992	21/04/2014	19	By Promotion
70	Abdus Salam Pri: GHS No.4 Abbott Abad	M.Sc B.Ed	10/05/1968	Mansehra	03/09/1992	21/04/2014	19	By Promotion
71	Raja Sujah ud Din Pri: GHSS DalolaAbbotabad	M.A M.Ed	05/05/1969	Harpur	01/04/1993	21/04/2014	19	By Promotion
72	Abdul Saeed Pri: GHS No.3 Peshawar Cantt	M.Sc B.Ed	15/05/1964	Nowshera	26/09/1992	21/04/2014	19	By Promotion

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SENIORITY LIST OF PRINCIPALS BS-19 MALE E&SED Khyber Pakhtunkhwa (Teaching Cadre)

515	Javed Ali Khan principal GHSS Utmanzal	M/Sc B/Ed	07/02/1964	Charsadda	10/11/1994	25/04/2014	19	By Promotion	
516	Muhammad Ayaz Principal GHSS Kheshtgl	M/A B/Ed	10/09/1964	Charsadda	10/11/1994	25/04/2014	19	By Promotion	
517	Tajamul Hussain Principal GHSS Tauda	M/Sc B/Ed	12/02/1963	Charsadda	17/12/1984	25/04/2014	19	By Promotion	
518	Alam Zeb At the disposal of Merged	M/A B/Ed	20/04/1964	Peshawar	22/02/1986	25/04/2014	19	By Promotion	
519	Abdul Haleem Principal GHS Dilbori mansehra	M/Sc B/Ed	18/03/1963	Mansehra	08/03/1990	25/04/2014	19	By Promotion	
520	Hidayat Ullah Principal B-19 GHSS Batara	M/A M/Ed	01/04/1964	Buner	18/07/1982	1/27/2020	19	By Promotion	
521	Saifur Rehman Principal B-19 GHS Slawarghar	MA/B.Ed	10/02/1963	Lakki	18/11/1986	1/27/2020	19	By Promotion	
522	Muhammad Saleem Principal B-19 GHSS	MA/B.Ed	07/09/1966	D.I.Khan	10/11/1994	1/27/2020	19	By Promotion	
523	Ghulam Akbar Principal B-19 GHSS Balambat Dir	MA/B.Ed	15/03/1964	Mardan	01/11/1988	1/27/2020	19	By Promotion	
524	Muhammad Raziq Principal GHSS	M/Sc B/Ed	03/03/1961	Swabi	02/02/1987	1/27/2020	19	By Promotion	Retired
525	Farooq Ahmad Principal GHSS Tarrapi Mansehra	M/Sc B/Ed	12/02/1963	Mansehra	01/02/1987	1/27/2020	19	By Promotion	
526	Samiullah Khan Principal GHSS	M/Sc B/Ed	25/05/1964	Bannu	25/09/1992	1/27/2020	19	By Promotion	
527	Muhammad Shaiq Principal GHS Kohi	M/Sc B/Ed	15/11/1962	Swabi	19/11/1987	1/27/2020	19	By Promotion	
528	Muhammad Sadique Principal GHSS Lasan	M/Sc B/Ed	12/05/1961	Abbottaba d	23/05/1988	1/27/2020	19	By Promotion	Retired
529	Muhtd Altaf Hussain Principal GHSS	MA/B.Ed	23/03/1962	D.I.Khan	30/03/1983	1/27/2020	19	By Promotion	
530	Muhammad Shoab Principal GHSS Naway	MA/B.Ed	27/11/1966	Swat	22/01/1990	1/27/2020	19	By Promotion	
531	Mushtaq Ahmad Principal GHSS Jhangi	M/Sc B/Ed	03/04/1963	Abbottaba d	18/02/1990	1/27/2020	19	By Promotion	
532	Muhammad Salim Principal GHSS	M/Sc B/Ed	09/02/1965	Karak	10/11/1994	1/27/2020	19	By Promotion	
533	Mr Jehangir Khan Principal GHS	MA/B.Ed	25/08/1964	Haripur	21/10/1986	1/27/2020	19	By Promotion	
534	Atiqur Rehman Senior Instructor RITE(M)	MA/B.Ed	10/06/1964	Tank	10/11/1994	1/27/2020	19	By Promotion	
535	Iais Muhammad Principal BS 19 GHSS	MA/B.Ed	02/04/1961	Mardan	27/02/1991	1/27/2020	19	By Promotion	Retired
536	Aman Ullah Principal GHSS Kabgani Swabi	MA/B.Ed	03/01/1963	Swabi	03/02/2001	1/27/2020	19	By Promotion	
537	Shah Zarin Principal GHS Jewar Buner.	MA/B.Ed	05/02/1966	Dir Upper	07/08/1989	1/27/2020	19	By Promotion	
538	Khurrshid-Khan Principal GHSS Kaghan	MA/B.Ed	20/10/1962	Lakki	03/05/1990	1/27/2020	19	By Promotion	
539	Asmat Ullah Principal GHSS Kawal Mansehra.	MA/B.Ed	15/02/1966	SWA	21/09/1995	1/27/2020	19	By Promotion	
540	Malik Khan Principal GHSS Kalkot Dir Upper.	MA/B.Ed	20/06/1965	karak	17/06/1991	1/27/2020	19	By Promotion	
541	Abdul Majid Principal GHS Balakot Mansehra.	MA/B.Ed	01/04/1966	Mansehra	14/11/1984	1/27/2020	19	By Promotion	

CERTIFICATE

It is certified that the above seniority list is:

1. Widely circulated.
2. Un-disputed/ Un-controversial
3. No legislation is pending/involved

Assistant Director (PERs/Seniority)
 Directorate of E & SE
 Khyber Pakhtunkhwa, Peshawar

Deputy Director (Estab M-II)
 Directorate of E & SE
 Khyber Pakhtunkhwa, Peshawar

ATTESTED
 Deputy Director (Estab M-II)
 Directorate of E & SE
 Khyber Pakhtunkhwa, Peshawar



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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

No. SO (PSB) ED/1-4/2021/P-213
Dated Peshawar, the January 12, 2022

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

**PROMOTION OF OFFICER FROM BS-19 TO BS-20
TEACHING CADRE ON REGULAR BASIS.**

Dear Sir,

I am directed to refer to Elementary & Secondary Education Department letter No. SO(SM) E&SED/3-3/2021/Promotion BS-19 to 20 dated 23.12.2021 on the subject and to say that the case has been examined in Regulation wing and observed that according to section 8(5) of Civil Servant Act 1973, the seniority list shall be revised and notified in the Official Gazette at least once in a Calendar Year, preferably in the month of January whereas the seniority list attached to the working paper is of the year 2019. Moreover, according to this department circular dated 05.03.2020, notified seniority list of the current year is required to be annexed alongwith the working paper (copy enclosed).

The working paper and other documents received with the letter quoted above are returned herewith in original for doing the needful at the earliest.

Yours faithfully,

 12.1.2022
SECTION OFFICER (PSB)

Incl: As above.

INDST. EVEN NO. & DATE.

A copy is forwarded to the Section Officer (R-1)
Establishment Department.

SECTION OFFICER (PSB)

51)

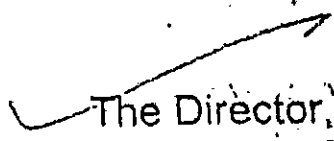
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT



No. SO(SM) E&SE/3-3/2021/Promotion Bs-19 to 20
Dated Peshawar the January 12, 2022

12-1-22

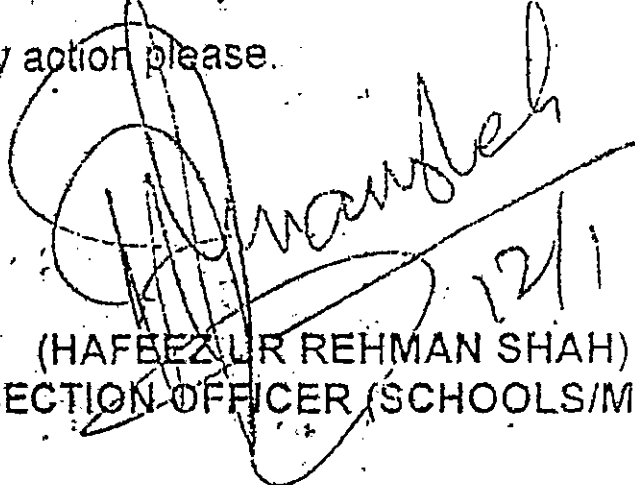


The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: PROMOTION OF OFFICER FROM BS-19 TO 20 TEACHING CASUALTY ON REGULAR BASIS

I am directed to refer to the subject noted and to return herewith working papers (06 sets in original) alongwith a copy of letter No. SO(PSB)ED/1-4/2022 dated 12.01.2022 received from Section Officer (PSB) Establishment Department which is self-explanatory for further necessary action please.

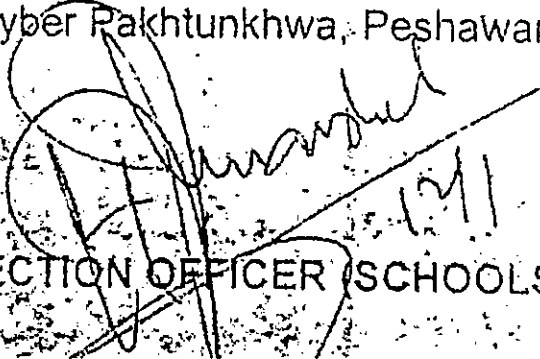
Incl: as Above


(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS/MAL)

Indst: Even No. & Date:

Copy of the above is forwarded to the:

1. Section Officer (Lit-II) E&SE Department Khyber Pakhtunkhwa.
2. Section Officer (PSB) Establishment Department Peshawar.
3. PS to Secretary, E&SE Department Khyber Pakhtunkhwa, Peshawar.


SECTION OFFICER (SCHOOLS/MAL)



TENTATIVE SENIORITY LIST OF PRINCIPALS BPS-19 MALE E&SED Khyber Pakhtunkhwa (Teaching Cadre) as stood on 31/12/2021

S.#	Name of Officer with Designation & Duty Station	Qualif:	D-O Birth	Domicile	Date of 1 st Entry in Edu; Dept;	Date of Present posting	BS	Method of Recruit	Remarks
1	Muhammad Bashir Prl: GHSS Kalo Khan Swabi	M.Sc B.Ed	05-04-1963	Swabi	22-10-1991	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
2	Mir Daud Khan Prl: GHSS Nozim Nasib Nawaz ISSAKI Shaikhan Bannu	M.A B.Ed	03-02-1964	Bannu	22-10-1991	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
3	Riasat Khan Principal GCMHS Turbela Township Haripur	M.Sc B.Ed	13-03-1962	Abbotabad	13-10-1985	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
4	Sikandar Sher Prl: GHSS Mansabdar Swabi	M.A M.Ed	10-03-1962	Swabi	15-05-1987	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
5	Raj Muhammad Khan Prl GHSS Baja Swabi	M.Sc M.Ed	13-01-1962	Nowshera	17-02-1992	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
6	Muhammad Salim Prl: GSSNCMHS No.1 Tank	M.A M.Ed	02-02-1962	D.I.Khan	11-11-1987	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
7	Abdul Halim Prl: GHS Jehangiri Karak	M.Sc M.Ed	16-07-1962	Karak	23-02-1984	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
8	Zaheer Ahmad Prl: GHS Kotha Swabi	M.Sc M.Ed	13-11-1962	Bannu	22-10-1991	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
9	Riaz Ahmad Bahar Prl: GHS GHS Shagal Jamrud District Khyber	M.Sc M.Ed	07-01-1964	Peshawar	22-10-1991	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
10	Muhammad Iqbal Prl: GHS Thall Hangu	M.A M.Ed	06-02-1962	Kohat	22-10-1991	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
11	Saif Ullah Khan Prl: GHS Nar Muzaffar Khan Lakki Marwat	M.A B.Ed	02-08-1962	Bannu	13-02-1988	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
12	Nisar Muhammad DEO(M) Khyber	M.Sc M.Ed	10-03-1963	Peshawar	14-11-1990	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
13	Taj Muhammad Prl: GHS Tur Dher No.1 Swabi	M.A M.Ed	31-12-1963	Mohmand Agency	19-03-1992	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
14	Hafiz Muhammad Rauf Prl: GHS Bazar Ahmad Khan Bannu	M.A B.Ed	10-11-1963	Bannu	19-04-1986	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
15	Saraf Ali Shah Prl: GHSS Slema Sekandar Khel Bannu	M.Sc B.Ed	25-05-1962	Bannu	27-09-1989	21-04-2014 (Restored to BS-19) 19/03/2021	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014 Restored to BS-19 vide No SO(SM)E&SED/4-17/2020/Saraf Ali Shah Ex-DEO Bannu Dated 19/03/2021
16	Lutfuer Rahman Prl: GHSS Gujarat Mardan	M.A B.Ed	18-11-1963	Nowshera	30-12-1990	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
17	Muhammad Nazir Prl: GHSS Patran Mansehra	M.Sc B.Ed	20-01-1963	Mansehra	11-08-1987	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
18	Muhammad Sharif Prl: GHSS Ghurghushto Buner	M.Sc M.Ed	02-06-1964	Swat	26-09-1992	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
19	Muhammad Mutahir Principal GHSS Jehangira Swabi	M.A M.Ed	22-03-1966	Swabi	26-09-1992	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
20	Ajmair Shah Prl: GHSS Nowshera kalan	M.A B.Ed	20-09-1967	Nowshera	26-09-1992	13-06-2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012

ATTACHED

**REVISED AND UPDATED (FINAL) SENIORITY LIST OF PRINCIPALS BPS-19 MALE E&SED Khyber Pakhtunkhwa
(Teaching Cadre) as stood on 31/12/2021**

S.#	Name of Officer with Designation & Duty Station	Qualif:	D-O Birth	Domicile	Date of 1 st Entry in Edu; Deptt;	Date of Present posting	BS	Method of Recruit	Remarks
1	Muhammad Bashir Prl: GHSS Kalo Kanan Swabi	M.Sc B.Ed	03/04/1963	Swabi	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
2	Mir Daud Khan Prl: GHSS Nazim Nasib Nawaz ISSAKI Shaikhhan Bannu	M.A B.Ed	03/02/1954	Bannu	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
3	Riasat Khan Principal GCMHS Turbela Township Haripur	M.Sc B.Ed	13/03/1962	Abbottabad	13/10/1985	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
4	Sikandar Sber Prl: GHSS Mansabdar Swabi	M.A M.Ed	10/03/1962	Swabi	15/05/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
5	Abdul Halim Prl: GHS Jehangiri Karak	M.Sc M.Ed	16/07/1962	Karak	23/02/1984	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
6	Zaheer Ahmad Prl: GHS Kotka Swabi	M.Sc M.Ed	13/11/1962	Bannu	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
7	Niaz Ahmad Bahar Prl: GHS GHS Shagai Jamrud District Khyber	M.Sc M.Ed	07/01/1964	Peshawar	22/10/1991	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
8	Saif Ullah Khan Prl: GHS Nar Muzaffar Khan Lakki Marwat	M.A B.Ed	02/08/1962	Bannu	13/02/1988	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
9	Nisar Muhammad DEO(M) Khyber	M.Sc M.Ed	10/03/1963	Peshawar	14/11/1990	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
10	Taj Muhammad Prl: GHS Tur Dher No.1 Swabi	M.A M.Ed	31/12/1963	Mohmand Agency	19/03/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
11	Hafiz Muhammad Rauf Prl: GHS Bazar Ahmad Khan Bannu	M.A B.Ed	10/11/1963	Bannu	19/04/1986	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
12	Saraf Ali Shah Prl: GHSS Slerma Sekandar Khel Bannu	M.Sc B.Ed	23/05/1962	Bannu	27/09/1989	21-04-2014 (Restored to BS-19) 19/03/2021	19	By Promotion	No.SO(S/M)E&SED/1-2/2014/Promotion BS-18 to BS-19 dated 21-04-2014 Restored to BS-19 vide No SO(S/M)E&SED/4-17/2020/Saraf Ali Shah Ex-DEO Bannu Dated 19/03/2021
13	Latifcer Raluwan Prl: GHSS Gujarat Mardan	M.A B.Ed	18/11/1963	Nowshera	30/12/1990	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
14	Muhammad Nazir Prl: GHSS Pairan Mansehra	M.Sc B.Ed	20/01/1963	Mansehra	11/08/1987	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
15	Muhammad Sharif Prl: GHSS Ghurghushto Buner	M.Sc M.Ed	02/06/1964	Swat	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
16	Muhammad Mutahir Principal GHSS Jehangira Swabi	M.A M.Ed	22/03/1964	Swabi	20/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012
17	Ajmair Shah Prl: GHSS Nowshera kadan	M.A B.Ed	20/09/1967	Nowshera	26/09/1992	13/06/2012	19	By Promotion	No.SO(S/M)E&SED/1-2/2011/Promotion BS-18 to BS-19 (Male) dated 13-06-2012

And

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S. No.	Name of Officer with Designation & Station	Qualif:	D-O Birth	Domicile	Date of 1 st Entry in Edu; Deptt;	Date of Present posting	BS	Mech. of Recruit	Remarks
499	Muhammad Aslam Principal GHSS Pandialay Mohmand	M.A B.Ed	11/02/1966	Charsadda	28/11/1992	26/03/2021	18	By Promotion	No.SO(SM)E&SED/3-3/2021/Promotion BS-18 to BS-19 (TC) dated 26-05-2021
500	Alam Zeb Khan Principal GHS Badawan Dir Lower	M.A B.Ed.	17/12/1966	Dir Lower	28/08/1994	26/05/2021	19	By Promotion	No.SO(SM)E&SED/3-3/2021/Promotion BS-18 to BS-19 (TC) dated 26-05-2021
501	S.Muhammad Tariq Principal GHS Shabqadar Fort Charsadda	M.A B.Ed	15/04/1969	Charsadda	10/11/1994	26/05/2021	19	By Promotion	No.SO(SM)E&SED/3-3/2021/Promotion BS-18 to BS-19 (TC) dated 26-05-2021
502	Nizar Ali Principal GHSS Utmanzai Charsadda	M.Sc B.Ed	20/11/1966	Charsadda	10/11/1994	26/05/2021	19	By Promotion	No.SO(SM)E&SED/3-3/2021/Promotion BS-18 to BS-19 (TC) dated 26-05-2021

CERTIFICATE

It is certified that the above seniority list is:

1. Widely circulated
2. Undisputed/Uncontroversial
3. No legislation is pending/involved.


 Deputy Director (Estab)
 Directorate of Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar

Deputy Director (Estt):
 (Maleen)
 Directorate of E & SE
 Khyber Pakhtunkhwa Peshawar

APPROVED



(61)

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

L
Ana
(41)

Peshawar the March 15, 2022

NOTIFICATION

NO. AO/E&SE/6-13/LPR/Hangu: In pursuance of Section-13 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), Muhammad Iqbal, Principal (BS-19), GHS Thall, Hangu stands retired from Government service w.e.f. 05-02-2022 (A.N) on attaining sixtieth (60th) year of age, as his date of birth is 06-02-1962.


2. The Competent Authority is further pleased to allow him 365 days encashment of leave in lieu of LPR as admissible to him under the Revised Leave Rules, 1981.

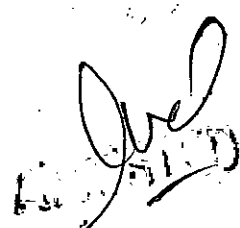
**SECRETARY
Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Edu: Department**

Endst: of even No. & date:

Copy forwarded to:

1. The Director, Elementary & Secondary Education, Peshawar.
2. The District Accounts Officer, Hangu.
3. The District Education Officer (Male), Hangu.
4. The Director, EMIS Cell, E&SE Department for uploading at official website.
5. The Section Officer (Schools/Male), Elementary & Secondary Education Department.
6. Muhammad Iqbal, Ex-Principal (BS-19), GHS Thall, Hangu.
7. Master File.


(ABDUL GHAFFAR)
SECTION OFFICER (ACCOUNTS)





(62)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

No.SO(SM)E&SED//2022/Misc.
Dated Peshawar the April, 18 2022

To

The Director,
Directorate of Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

→ EOM
27-4-2022

SUBJECT: APPEALS/ REQUESTS ETC.

I am directed to refer to the subject noted above and to enclose herewith the following documents received from various employees of this Department: *for further necessary action please.*

S.No.	Subject	Received from
1.	Seniority issue	Mr. Rasool Muhammad SS (Chemistry) and others.
2.	Inclusion of name in the seniority list.	Mr. Dolat Khan Headmaster
3.	To stop proceedings/personal hearing towards separation joint seniority of SS/HM.	Mr. Sajid Saleem SS and others.
4.	Appeal against the unlawful process of working paper SS/HM	Dr. Fazli Rabbi
5.	Suggestion/Recommendations for reformation E&SED	Mr. Bakhtiar Khan President and others
6.	Request for updation of 4-tiers on sanctioned posts	-do-
7.	Appeal for notional promotion	Mr. Muhammad Saleem, Sikandar Sher, Raj Muhammad Khan, Riasat Khan, Muhammad Iqbal retired Principals (BS-19)

8- *Froba Muhammad,
S.I.P.E G.H.S. Sakh 348
Gawbi Mardan.*

Appeal of ainsab at 18-04-22
(SYEDA ZAINAB NAQVI)
SECTION OFFICER (SCHOOLS MALE)

Copy of the above is forwarded to:-

1. PS to Secretary, E&SE Department.
2. PA to Deputy Secretary (Admn) E&SE Department.

TESTED
*Diary No. UDE
357
4/5/22*

for ainsab at 18-04-22
SECTION OFFICER (SCHOOLS MALE)

PS/C.S Khyber Pakhtunkhwa
Diary No. 1376 W/E
Date: 17-3-2022

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The Honorable Chief Secretary to
Govt of Khyber Pakhtunkhwa
Peshawar.

Subject: Appeal For Notional Promotion

Respected Sir,

With profound veneration, it is submitted that I have been working as a Principal BS-19 since 05-01-2009. Our promotion case from BS-19 to BS-20 was submitted to PSB on 30-12-2020, but the Provincial Selection Board did not consider promotion of our Ten officers due to CPLA filed by the provincial government in the case of age of superannuation retirement.

Meanwhile our Final Seniority was challenged in the Honorable Khyber Pakhtunkhwa Services Tribunal Peshawar and our promotion case could not be submitted to PSB held on 30-07-2021 & 31-07-2021.

The said appeal was later on dismissed by Honorable Services Tribunal on 09-11-2021 and our seniority stood on 31-12-2019 remained undisputed. But in spite of this, our promotion case could not be submitted to the PSB, which was held on 02-12-2021.

Sir,

Our promotion case was delayed for more than one year due to litigation process and thus we have been deprived of our due right of promotion for three times.

Sir,

Lastly my working papers for promotion along with other officers to BS-20 was submitted to the Section officer PSB of Establishment Department vide SO(SM)E&SED/3-3/2021 Promotion BS-19 to BS-20 Dated Peshawar 23-12-2021.

Mean While I requested to your good self for promotion on circulation basis before my retirement due on 01-02-2022. However, the request was not entertained and I retired from service on 01-02-2022. (Copy attached)

Hence the instant appeal is humbly submitted to grant me notional promotion from BPS-19 to BPS -20.

Thanking you in anticipation please.

Dated: 16-03-2022

So, (M) D/CA
A/S (E)
18/3
Chief Secretary
Govt. of Khyber Pakhtunkhwa
Secy: EKSE
17-3-22

22-3-22
Yours obediently,
Muhammad Salim
Principal BS-19 (Rtd)
GHSSNCMHS No-1 Tank
Village & P/O Pai District Tank

Copy to:

- 1) Section Officer PSB Establishment Department Peshawar.
- 2) PS to Secretary Elementary & Secondary Education Department Peshawar.
- 3) PS to Secretary Establishment Department Peshawar.

Handwritten signature

(64)

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POWER OF ATTORNEY
BEFORE KHYBER PAKHTUNKHWA (K.P.K) SERVICE TRIBUNAL
PESHAWAR

Appeal _____ No. _____ /2022

Muhammed Salem **VERSUS** Group of K.P.K
etc

We, (the accused / petitioners), do hereby appoint **Mr. Inayat Ullah Khan Tareen Advocate**, in the above mentioned case to do or any of the following acts deeds and things.

1. To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
2. To sign, verify and present pleadings, appeals, cross objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
3. To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
4. To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
5. To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred in the Advocate whenever he may think fit it do so.

And we hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

And we hereby agree not to hold the Advocate or its substitute responsible for the result of the said case in consequence of his absence from the court when the said case is called up for hearing.

And we hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid. We shall be entitled to withdraw from the prosecution of the said case until the same is paid.

In witness whereof we hereunto set our hand to these presents the contents of which have been explained to and understood by me, this 02 day of 07, 2022.

Attested and
ACCEPTED BY:
Accused



Inayat Ullah Khan Tareen
Advocate,
High Court Peshawar
Bc-17-8000
Cell: 0332-5700875



Signature/ thumb impression of the
12201-1876982-9
0335-9445974



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SCANNED
KST
Peshawar

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 5499

Dated 22/5/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 1132/2022

Mr. Muhammad SaleemAppellant.

VERSUS

Chief Secretary, Govt: of Khyber Pakhtunkhwa & others.....Respondents.

I N D E X

S#	Description of Documents	Annex	Pages
9.	Para-wise comments/reply	A	1-3
10.	Affidavit	B	4
11.	Authority Letter	C	5
12.	Annexures	D	6-11

11/1/22
Despondent

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

Service Appeal No # 1132/2022

Mr. Muhammad SaleemAppellant

Versus

Chief Secretary, Govt of Khyber Pakhtunkhwa & Other.....Respondents

**APPLICATION FOR SETTING ASIDE EX-PARTY PROCEEDING DATED 06-01-2023
AND RESTORING RIGHT OF FILING PARA-WISE COMMENTS.**

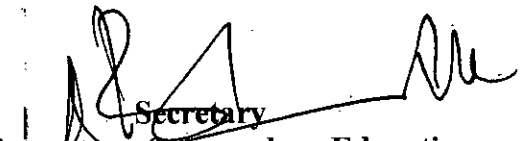
Respectfully Sheweth,

- 1 That the above titled appeal was fixed before this Honorable Tribunal on 06-01-2023 for submission of written reply.
- 2 That the Honorable Tribunal has ordered against the respondents as ex-parte alongwith striking out the Right of respondents for non-filing of para-wise comments. (Copy enclosed).
- 3 That feeling aggrieved the respondents seeks restoration of the right of filing para-wise comments on the following grounds inter alia.

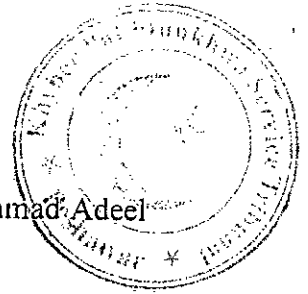
Grounds:

- 1 That the valuable rights of the department/respondents are involved with the instant Service Appeal.
- 2 That the application is within time and there is nothing dis-obedience on the part of respondents.
- 3 That on the very same day on which the respondents were proceeded ex-parte. The para-wise comment were ready to file but the delay was caused due to proper submission of attested copies and vetting of the said comment.
- 4 That there is no legal bar in acceptance of the application in hand.
- 5 That the delay was not intentional but due to the above reason respondents will show punctuality in future.
- 6 That according to the rule of natural justice no one can be condemned un-heard.
- 7 That the filing of para-wise comments is very necessary for the just and proper disposal of the above service appeal.

It is therefore, most humbly requested that an acceptance of this application the ex-party proceedings against the respondents may be set aside & right to file para-wise comments may kindly be restored Please.


Secretary
Elementary & Secondary Education,
Department (Respondent No. 1 & 2)

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A. No. 129/2022



6th Jan, 2023

None for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

There is nobody present on behalf of the respondents nor did they submit written reply/comments. The time provided in Rule-12 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 for filing reply is seven days before the date fixed but despite providing opportunity the respondents have not filed the comments. They are thus placed ex-parte and their right to file reply stands struck off. Therefore, let this appeal be admitted to full hearing subject to all just and legal objections. The appellant is directed to deposit security fee within ten days. To come up for arguments on 21.02.2023 before D.B.

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(Kalim Arshad Khan)
Chairman

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 10/1/23
Number of Pages 2-10
Copyist Fee 10/-
Usher 10/-
Total 20/-
Date of Delivery of Copy 11/1/23

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

In Service Appeal No. 1132/2022

Mr. Muhammad Saleem.....Appellant.

VERSUS

Chief Secretary to Govt of KPK Peshawar..... Respondents.

PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NOS. 1 TO 4.

Respectfully Sheweth,

Preliminary Objections:

1. The appellant has got no cause of action against the Respondents.
2. The appellant has not come to the Tribunal with clean hands.
3. The appellant is not an aggrieved person nor has any locus standi to file the present appeal.
4. That the appellant has concealed material facts from this Tribunal.
5. That the appellant is estopped by his own conduct to file the present appeal.
6. That the present appeal is against the prevailing law and rules.
7. That the appellant is not entitled for any relief, he has sought from this Honorable Tribunal.
8. That the present appeal is liable to be dismissed being devoid of any merits.
9. That the present appeal is barred by law and hence no maintainable.
10. That the appeal is bad for misjoinder and non-joinder of necessary parties.

On FACTS

1. Pertains to record.
2. Pertains to record.
3. Pertains to record, however, it is pertinent to mention here that the Provincial Selection Board proceeded in accordance with law and took up the case for the then vacant positions where top five were recommended for promotion and as there were no further vacant post available. Therefore, no further promotions were given to anybody and same as the position of the present appellant.
4. Pertains to record, however, the fact that the superannuation age of civil servants from 60 to 63 years was once for all settled as 60 years by Khyber Pakhtunkhwa Civil Servant Act, (Amendment) 2021.
5. Pertains to record, however it is pertinent to mention here that the appellant was not an eligible candidate for the promotion as there were only five post available vacant whereas the present appellant was on S. No. 11 in the seniority list of BPS-19.
6. Incorrect, the appellant was not eligible for promotion due to non-availability of posts that is why only top five were promoted.
7. Incorrect, the respondents have performed their duty in accordance with law and as the situation of availability of post of BPS-20 (Teaching Cadre) was unknown and still occupied by the then officers because of the amendment in Khyber Pakhtunkhwa Civil Servant Act (Amendment) and after the settlement of the above matter of retirement of officers the appellant was retired and therefore, not taken up from any further PSB meeting.

- 8. In response of Para-08, it is submitted that as stated in above paras the appellant was retired on 12-01-2022 and till than no Provincial Selection Board meeting were scheduled due to the non-availability of vacant posts of BPS-20 (Teaching Cadre). Therefore, the appeal is without any legal standing and is liable to be dismissed being devoid of any merits.
- 9. Incorrect, in fact in the upper part of the same para it is admitted by the appellant that when the working paper was sent, the appellant stood retired from service. So it is clear from the appeal of the appellant that before PSB meeting the right of promotion of appellant ceased being retired on 12-01-2022. It is further submitted that the appellant was in the knowledge of the current situation of the than working paper, PSB meeting and his retirement date but in spite of knowledge of having no name of the appellant in working paper dated 12-01-2022 his departmental appeal was filed on 17-03-2022, which is time barred and validly dismissed by the department appellate authority.
- 10. Para-10 alongwith all the grounds are incorrect, hence denied, the appellant is not an aggrieved person in the eye of law.

On Grounds:

- A. Incorrect, in PSB meeting 30-12-2020 only top five panelist were recommended for promotion from seniority list of BPS-19 dated 21-12-2019 because of the non-availability of further vacant posts.
- B. Incorrect, the appellant there were no post available for promotion during his employment and likewise him many people retired and the other got promotion on availability of posts.
- C. Incorrect, and denied. The Government has its policies and make chances in it from time to time through legislations in which the Respondents cannot interfere being constitutional powers. So the amendment in superannuation period was the aim of Government and at that time that was legal for the respondent which was the act of the parliament and because of the act of the parliament there were no vacant post at all.
- D. Incorrect, the detail reply is given the above parawise comments.
- E. Incorrect, the appellant was not entitled for any relief and so is the current situation, therefore, the appeal in hand is not maintainable.
- F. Incorrect, the appellant is not an aggrieved person and is not entitled for any relief.
- G. Incorrect, the appeal is hopelessly time barred.

It is therefore, most humbly requested that the appeal may kindly be dismissed being having no force of law and devoid of merits.



**DIRECTOR
Education Khyber Pakhtunkhwa
(Respondent No. 4)**

**SECRETARY
Elementary & Secondary Education,
(Respondent No. 1 & 2)**

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 1132/2022

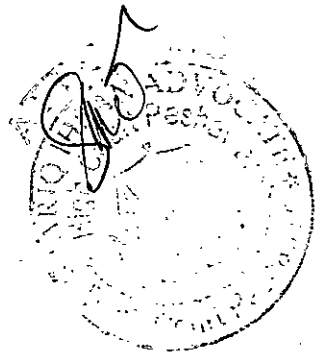
Mr. Muhammad Saleem.....Petitioner

VERSUS

Govt. of Khyber Pakhtunkhwa & others.....Respondents

AFFIDAVIT

I, **Muhammad Imran Zaman**, Section Officer (Litigation-II) Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



DEPONENT

11/1/2022
Imran

Muhammad Imran Zaman
Section Officer (Lit-II)
E&SE Department Peshawar

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

AUTHORITY

I, Section Officer (Litigation-II), Elementary & Secondary Education, Department, do hereby authorize Mr. Fahim Ullah (Focal Person) of Elementary & Secondary Education, Department, Government of Khyber Pakhtunkhwa to attend and submit para-wise comments the Khyber Pakhtunkhwa Service Tribunal Peshawar on behalf of the undersigned.

11/1/2015
Fav

SECTION OFFICER (LIT-II)
Elementary & Secondary Education, Department,
Government of Khyber Pakhtunkhwa

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PSB-II

**PENAL PROFORMA FOR
PROVINCIAL SELECTION BOARD**

In respect of **Muhammad Saleem**

Per

Domicile - D.II.Khan		Service/Group		Sen: No. 12		
Education Qualification		Date of Birth		Date of Superannuation		
MA/Med		02.02.1962		01.02.2022		
SERVICE PARTICULARS						
Date of Joining/ Service	Date of Promotion in respect of			Length of Service		Eligibility for consideration
	Present Scale	Lower Rank		Total	In present Scale	
		B-17	B-18			
11.11.1987	13.06.2012	22.10.1991	9.2.2004	Y- 32 & 04 months	Y-8 & 01 month	Eligible for promotion
Important appointments held in the present Rank/post:						
1	Principal BS-19 GCMHS No. 1 Tank					
Penalties (if any) Nil						
Training Courses (other than mandatory Training)						
Number of PERs						
Basic Scale	Outstanding	Very Good	Good	Average	Below Average	Adverse report/ Remarks in
B-17		04	08	-	-	-
B-18		05	03	-	-	-
B-19		02	06	-	-	-
Awaited Reports (PERs)			Additional Information (if any)			
EFFICIENCY INDES						
Required Threshold	Score of PERs + Training Reports		Marks awarded by PSB		Total	
70	53					
Recommendations of PSB						
Promoted		Deferred		Superseded		

Prepared by

Checked by

Secretary
Education Department (KP)

PER GRADING AND QUANTIFICATION FORM FOR REGULAR PROMOTION TO BS-20
IN RESPECT OF Mr. RIASAT KHAN (DOB 13.03.1962)
Seniority No.8

Year	Period of PER		Pen Picture	Countersigning Officer	PERs Assessment	Fitness for Promotion	Score
	From	To					
Previous Scale (BP-17)							
1992	1.1.1992	31.12.1992	He is an honest and efficient worker	Agreed.	Good	Fit	7
1993	1.1.1993	31.12.1993	An intelligent honest and dutiful officer	Agreed.	Good	Fit	7
1994	1.1.1994	31.12.1994	An intelligent honest and dutiful officer	Agreed.	Good	Fit	7
1995	1.1.1995	31.12.1995	Cooperative energetic and submissive subordinate	Agreed.	Good	Fit	7
1996	1.1.1996	31.12.1996	A good teacher	Agreed.	Good	Fit	7
1997	1.1.1997	31.12.1997	A good teacher	Agreed.	Good	Fit	7
1998	1.1.1998	31.12.1998	Cooperative an honest and good teacher	Agreed.	Good	Fit	7
1999	1.1.1999	31.12.1999	Cooperative and a submissive officer	Agreed.	V.good	Fit	10
2000	1.1.2000	31.12.2000	Punctual, hardworking, cooperative and obedient.	Agreed.	V.good	Fit	10
2001	1.1.2001	31.12.2001	Punctual, hardworking, obedient and cooperative	Agreed.	Good	Fit	7
2002	1.1.2002	31.12.2002	Hardworking and regular	Agreed.	V.good	Fit	10
2003	1.1.2003	31.12.2003	Dedicated and efficient				93
Previous Scale (BP-18)							
2004	1.1.2004	31-12-2004	He is a very Cooperative silent nature and devoted to his job duties and can solve the problems	Agreed	V.good	Fit	10
2005	1.1.2005	31-12-2005	He perform his duties efficiently and with keen interest	Agreed	V.good	Fit	10
2006	1.1.2006	31-12-2006	He is an efficient and hardworking officer	Agreed	V.good	Fit	10
2007	1.1.2007	31-12-2007	The officer is honest, dutiful, hardworking and painstaking officer	Agreed	V.good	Fit	8
2008	1.1.2008	31-12-2008	Industrious, enterprising and cooperative officer.	Agreed	Good	Fit	7
2009	1.1.2009	31-12-2009	Industrious, cooperative, courteous and helpful officer.	Agreed	Good	Fit	7
2010	1.1.2010	31-12-2010	He is regular, efficient, good communication skill and can be trusted. He can work in any circumstances	Agreed	V.good	Fit	8
2011	1.1.2011	31-12-2011	Industrious, enterprising, courteous and cooperative.				70
Present Scale (BP-19)							
2012	1.1.12	31.12.12	Regular industrious, enterprising and cooperative officer.	Agreed	V.good	Fit	8
2013	1.1.13	31.12.13	Cooperative, industrious enterprising and promising officer.	Agreed	V.good	Fit	8

Director
Khyber Pakhtunkhwa Peshawar

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**PER GRADING AND QUANTIFICATION FORM FOR REGULAR PROMOTION TO BS-20
IN RESPECT OF Mr. RIASAT KHAN (DOB 13.03.1962)**

Seniority No.8

2014 A	1.1.14	30.4.14	Regular punctual task oriented, trustworthy and has very good ability to work under pressure.	Agreed	V.good	Fit	8
2014 B	1.5.14	31.12.14	Riasat Khan has the ability to work under pressure. He reliably applies own technical knowledge and solve the problems.	Agreed	Good	Fit	7
2015	1.1.15	31.12.15	An honest officer.	Agreed	V.good	Fit	8
2016	1.1.16	31.12.16	Honest and competent officer.	Agreed	V.good	Fit	8
2017	1.1.17	31.12.17	Skillful and seasoned officer.	Agreed	V.good	Fit	8
2018	01.01.2018	31.12.2018	Performed very well while his stay at district	Agreed	V.good	Fit	8
2019	01.01.2019	31.12.2019	Hardworking aand trustworthy officer.	Agreed	V.good	Fit	8
							71

Comprehensive efficiency index

PERs Quantified Score 50:30:20@ 70%	Basic Scale	Aggregate Score	Weightage Factor	Points Obtained
	Present Scale	7.89	39.44	33.13
	Previous Scale(B)	8.75	26.25	23.38
	Previous Scale(A)	7.75	15.50	
	(i) Additions*			
	(ii) Deletions**			
	Total C5+B3+A2		24.39	

Evaluation by the PSB out of 30 marks

G.Total

Required threshold on CEI for promotion to BP-20 is 70

- * 2 marks shall be added for serving in a government training institution including those meant for specialized training in any particular cadre for a period
- ** 5, 3 & 1 marks shall be deducted for each major, minor penalty and adverse remarks respectively.

[Signature]
Secretary (P)
Elementary & Secondary Education
Khyber Pakhtunkhwa Province

[Signature]
Deputy Director (P)
Elementary & Secondary Education
Khyber Pakhtunkhwa Province

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REVISED AND UPDATED (FINAL) SENIORITY LIST OF PRINCIPALS BPS-19 MALE-E&SED Khyber Pakhtunkhwa (Teaching Cadre) as stood on 31/12/2019

PSB

S.#	Name of Officer with Designation	Qualif:	D/O Birth	Domicile	Date of 1 st Entry In Edu; Deptt;	Date of Present posting	BS	Method of Recruit	Remarks
1	Sher Nawaz Pri: GHS Landiwah Lakki Marwat	M.A M.Ed	15/03/1965	Bannu	22/10/1999	13/06/2012	19	By Promotion	
2	Muhammad Ashraf Deputy Director FITE Jamrud	M.Sc M.Ed	03/05/1961	Kohat	13/09/1990	13/06/2012	19	By Promotion	(19)
3	Nozlin ud Din Principal RITE (M) Darosh Chitral	M.A M.Ed	01/04/1964	Chitral	24/12/1989	13/06/2012	19	By Promotion	
4	Munawar Gul Pri: GHSS Tarnab Farm Peshawar	M.A M.Ed	15/03/1962	Bannu	31/10/1981	13/06/2012	19	By Promotion	
5	Moin ud Din Principal GHSS Shakar Dara Kohat	M.Phil.Edu	01/01/1961	Karak	30/09/1987	13/06/2012	19	By Promotion	
6	Muhammad Bashir Pri: GHS Kalo Khan Swabi	M.Sc B.Ed	05/04/1963	Swabi	22/01/1991	13/06/2012	19	By Promotion	
7	Mir Daud Khan Pri: GHSS Nazim Nasib Nawaz ISSAKI Shaikhan Bannu	M.A B.Ed	03/02/1964	Bannu	22/10/1991	13/06/2012	19	By Promotion	
8	Riasat Khan Principal GCMHS Torbala Township Haripur	M.Sc B.Ed	13/03/1962	Abbottabad	13/10/1985	13/06/2012	19	By Promotion	
9	Sikandar Sher Pri: GHSS Mansabdar Swabi	M.A M.Ed	10/03/1962	Swabi	15/05/1987	13/06/2012	19	By Promotion	
10	Nolk Nawaz Khan Sec BISE Bannu	M.A B.Ed	08/09/1961	Bannu	22/03/1992	13/06/2012	19	By Promotion	
11	Raj Muhammad Khan Secretary BISE DI Khan	M.Sc M.Ed	13/01/1962	Nowshera	17/02/1992	13/06/2012	19	By Promotion	
12	Muhammad Salim Pri: GSSNCMHS No.1 Tank	M.A M.Ed	02/02/1962	D.I.Khan	11/11/1987	13/06/2012	19	By Promotion	
13	Hussam ul Haq Pri: GHS no.3 Kohat	M.A M.Ed	01/01/1961	Kohat	11/02/1992	13/06/2012	19	By Promotion	
14	Abdul Halim Pri: GHS Jehangiri Karak	M.Sc M.Ed	16/07/1962	Karak	23/02/1984	13/06/2012	19	By Promotion	
15	Zaheer Ahmad Pri: GSNMHS Taru Jabba Nowshera	M.Sc M.Ed	13/11/1962	Bannu	22/10/1991	13/06/2012	19	By Promotion	
16	Riaz Ahmad Bahar Pri: GHS Civil Quarter Peshawar	M.Sc M.Ed	07/01/1964	Peshawar	22/10/1991	13/06/2012	19	By Promotion	
17	Mir Laiq Pri: GHSS Hakim Barat Bannu	M.A B.Ed	03/08/1961	Bannu	05/10/1987	13/06/2012	19	By Promotion	
18	Muhammad Iqbal Pri: GHS Badber Peshawar	M.A M.Ed	06/02/1962	Kohat	22/10/1991	13/06/2012	19	By Promotion	
19	Saif Ullah Pri: GHSS Kot Kashmir Lakki	M.A B.Ed	02/08/1962	Bannu	13/02/1988	13/06/2012	19	By Promotion	
20	Nisar Muhammad DEC(M) Mansehra	M.Sc M.Ed	10/03/1963	Peshawar	14/11/1990	13/06/2012	19	By Promotion	
21	Taj Muhammad Pri: GHS Tur Dher No.1 Swabi	M.A M.Ed	31/12/1963	Mohmand Agency	19/03/1992	13/06/2012	19	By Promotion	
22	Haliz Muhammad Rauf Pri: GHS Bazar Ahmad Kheh Bannu	M.A B.Ed	10/11/1963	Bannu	19/04/1986	13/06/2012	19	By Promotion	
23	Lutfur Rahman Pri: GHSS labour Colony Mardan	M.A B.Ed	10/11/1963	Nowshera	30/12/1990	13/06/2012	19	By Promotion	
24	Muhammad Ajmal Pri: GHSS Takkar Mardan	M.Sc B.Ed	10/12/1961	Mardan	20/11/1986	13/06/2012	19	By Promotion	
25	Abdul Aziz Pri: GHS No.1 Abbottabad	M.A M.Ed	23/02/1961	Bannu	23/02/1983	13/06/2012	19	By Promotion	
26	Muhammad Nazir Pri: GHSS Shinkari Mansehra	M.Sc B.Ed	20/01/1963	Mansehra	11/08/1987	13/06/2012	19	By Promotion	
27	Muhammad Sharif Pri: GHS Kola Swabi	M.Sc M.Ed	02/06/1964	Swat	26/09/1992	13/06/2012	19	By Promotion	
28	Muhammad Mullahir Member Text Book Board Peshawar	M.A M.Ed	22/03/1966	Swabi	26/09/1992	13/06/2012	19	By Promotion	
29	Ajmair Shah Pri: GHS No.1 Nowshera kalan	M.A B.Ed	20/09/1967	Nowshera	26/09/1992	13/06/2012	19	By Promotion	
30	Waqar Ali Pri: GHSS Dosehra Charsadda	M.A M.Ed	06/05/1970	Nowshera	28/08/1992	13/06/2012	19	By Promotion	
31	Wali Khan Pri: GHS khujaki Killa Karak	M.Sc M.Ed	09/04/1969	Karak	26/09/1992	13/06/2012	19	By Promotion	
32	Munawar Khan Pri: GHS Gul Bela Peshawar	M.Sc B.Ed	24/01/1968	Bannu	26/09/1992	13/06/2012	19	By Promotion	

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 Director
 Education Department
 Peshawar

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Annex-

STATEMENT SHOWING THE NUMBER OF RETIRED/CONDITIONAL
RETIED OFFICERS IN BS-20

Sll	Name of officer with Designation	Date of Birth	Date of Retirement
1.	Mr. Matjullah, Ex-Principal BS-20 GHSS No.1 Peshawar	Pre-Mature	31.10.2019
2.	Mr. Mir Qalam Khan, Ex-Principal BS-20 GHSS Karak	Pre-Mature	02.03.2020
3.	Mr. Hussain Ahmad, Ex-Principal BS-20 RITE (M) Timergara Dir Lower	25.02.1959	24.02.2019
4.	Mr. Luqman Ali Khan, Ex-Principal BS-20 GHSS No. 1 Mansehra	25.02.1959	24.02.2019
5.	Muhammad Riaz, Ex-Principal BS-20 RITE (M) Chitral	14.03.1959	13.03.2019 (case is under process)
6.	Mr. Attaullah Khan, Ex-Principal BS-20 GHSS No. 2 D.I Khan	01.01.1960	31.12.2019
7.	Mr. Dilawar Khan, Ex-Principal BS-20 GHSS No. 2 Bannu	01.02.1960	31.01.2020 (Conditionally Retired)
8.	Mr. Hamayun Khan, Ex-Principal BS-20 GCMHS Timergara Dir Lower	03.02.1960	02.02.2020 (Conditionally Retired)
9.	Mr. Mir Baz Khan, Ex-Principal BS-20 GCMHS Daggar Buner	20.03.1960	19.03.2020 (Conditionally Retired)
10.	Mr. Hakim Ullah, Ex-Director BS-20 Director PITE Peshawar	02.04.1960	01.04.2020 (Conditionally Retired)
11.	Mr. Abdul Haq, Ex-Principal BS-20 RITE (M) Mardan	25.05.1960	24.05.2020 (Conditionally Retired)
12.	Mr. Ahmad Jan, Ex-Principal BS-20 GSUHHSS Charsadda	10.06.1960	09.06.2020 (Conditionally Retired)
13.	Mr. Sifat Ullah, Ex-Principal BS-20 GCMHS Lakki Marwat	01.09.1959	(Conditionally Retired)
14.	Mr. Zahid Rashid, Ex-Principal BS-20 GCMHS Lakki Marwat	15.09.1960	(Conditionally Retired)
15.	Mr. Fida Muhammad, Ex-Principal BS-20 GCMHS Chitral	12.12.1960	Conditionally Retired

AW
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Establishment Directorate
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