


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No. 1415/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge.
1	2	3
1-	06-Sep-24	<p>The appeal of Mr. GULZAR JAN presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 13-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

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

SERVICE APPEAL NO 1415 / 2024

GULZAR JAN

VS

EDU: DEPTT:

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Dated: 06-08-2024

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK  
ADVOCATE SUPREME COURT

-1-

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

**APPEAL NO. 1415 /2024**

Mr. Gulzar Jan, SCT BPS (16),  
GHS Akhurwall, District Kohat.

.....**APPELLANT**

**VERSUS**

- 1- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, khyber Pakhtunkhwa, Peshawar.
- 4- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 5- The District Education Officer (Male) Kohat.

.....**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED SERVICE RULES NOTIFIED DATED 24/07/2014 TO THE EXTENT OF SERIAL NO. 1 (B) COLUMN NO 03, SECOND CLASS BACHELOR DEGREE AND WHEREBY JOINERS TO APPELLANT HAS BEEN PROMOTED TO THE POST OF SST BPS-16 WHILE THE APPELLANT WAS IGNORED AND ALSO AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned Notification dated 24-07-2014 of the respondents may very kindly be rectified/modified by deleting the condition of B.A/ Bsc Second Division in Column No.3, Serial No 1 (B), which is required for promotion to the post of SST (BPS-16) and the respondents may kindly be directed to consider the appellant for promotion to the post of SST BPS-16 w.e.f 12.10.2017 with all back benefits including seniority. Any other remedy which this august Court deems fit may also be awarded in favor of appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant is a peaceful and bonafide resident of Village Dara Adam Khel Donga, Tehsil & District Kohat and belongs to a respectable family.

- 2- That appellant was initially appointed as CT BPS-15 on temporarily basis vide order 28/08/1988, and start performing his duties quite efficiently and to the entire satisfaction of his superior. Copy of the appointment order is attached as annexure..... **A**
- 3- That the appellant was appointed by the respondents department on the qualification of Matric and FA/FSc while the appellant was obtain the Bachelor of Education, Bachelor of Arts degree during his service and got 3<sup>rd</sup> division, the appellant also obtain certificate of teaching from Department of Education. Copy of Educational testimonials are attached as annexure.....**B**
- 4- That the appellant was performing his duty in respondents department, the respondents department awarded him service certificate and relieving chit and appellant was upgraded to BPS-16 and transferred to GHS Akhurawal FR Kohat vide no 713-15 dated 18-04-2014. Copies of service certificate and relieving chit are attached as annexure.....**C& D**
- 5- That in light of the ibid appointment order the appellant submit his charge report and accordingly relived from his prewise post, started performing his duties quit efficiently and up to the entire satisfaction of his superior.
- 6- That the respondents department issued notification dated 24/07/2014 in which the criteria was fixed for the post of Secondary School Teacher (BPS-16) is at least second class bachelor degree and seventy five percent by promotion. Copy of the Notification dated 24/07/2014 attached as annexure.....**E**
- 7- That on dated 12/10/2017 Departmental Promotion Committee was conducted in which all the employees were promoted/Adjusted against the post of SST but the respondents department ignored the appellant for promotion/Adjustment against the post of SST. Copy of order dated 12/10/2017 is attached as annexure.....**F**
- 8- That respondents department issued final seniority list of the Certified Teachers on dated 31/07/2022 the appellant was placed is at serial no 03 of the seniority list and was eligible for promotion but the respondents department ignored the appellant for promotion without any reason and clear justification while juniors to appellant have been promoted to the post of SST BPS-16. Copy of final seniority list is attached as annexure.....**G**
- 9- That the respondents department issued another office order dated 03/06/2024 for schedule of Departmental Promotion Committee for the differed promotion cases against the post of

SST's, CT's, SAT's held on 12/06/2024. Copy of order dated 03/06/2024 is attached as annexure.....H

- 10-** That felling aggrieved appellant preferred departmental appeal before the respondents, but no response has been given by the respondent department till the expiry of statutory period of ninety days. Copy of the departmental appeal is attached as annexure.....I
- 11-** That having no other remedy the appellant filed the instant appeal on the following grounds amongst the others.

**GROUND:**

- A-** That the inaction of the respondents by not deleting the condition of B.A /BSc Second division and not allowing the third divisioner for promotion to the post of SST (BPS-16) is against the law, facts and norms of natural justice.
- B-** That the impugned Notification dated 24-07-2014 of the respondents by ignoring the appellant/3<sup>rd</sup> divisioner from promotion to the post of SST BPS-16 is against the law and norms of natural justice.
- C-** That the inaction of the respondents by not considering the appellant/3<sup>rd</sup> divisioner for promotion to the post of SST is against the law, facts and norms of natural justice.
- D-** That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- E-** That the respondent Department acted in arbitrary and malafide manner by not considering the appellant for promotion to the post of SST BPS-16.
- F-** That the appellant has been discriminated by the respondent Department on the subject noted above and as such the respondent violated the principle of natural justice.
- G-** That the action and inaction of the respondents is violative section-9 of the civil servant Act, 1973 read with Rule-7 of the appointment, promotion and transfers Rules, 1989.
- H-** That the action and inaction of the respondents is violative Article 38-E of the Constitution of Pakistan, 1973.

I- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 06-09-2024

  
APPELLANT

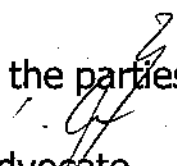
THROUGH:

  
NOOR MUHAMMAD KHATTAK  
ADVOCATE SUPREME COURT

  
UMAR FAROOQ MOHMAND  
ADVOCATE HIGH COURT

**CERTIFICATE:**

No such like appeal is pending or filed between the parties on the subject matter before this Honorable Tribunal.

  
Advocate

**AFFIDAVIT**

I, Gulzar Jan, (the appellant), do hereby solemnly affirm on oath that the contents of the above appeal are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.

  
DEPONENT

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

SERVICE APPEAL NO \_\_\_\_\_ / 2024

**GULZAR JAN**

**VS**

**EDU: DEPTT:**

**APPLICATION FOR GRANT OF INTERIM RELIEF BY**  
**RESTRAINING THE RESPONDENT, NOT TO PROCEEDING OF**  
**DEPARTMENTAL PROMOTION COMMITTEE (DPC) TILL THE**  
**FINAL DISPOSAL OF THE INSTANT SERVICE APPEAL.**

Respectfully Sheweth:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against impugned Service Rules notified dated 24/07/2014 to the extent of Serial No. 1 (b) Column No 03, Second Class Bachelor Degree and whereby joiners to appellant has been promoted to the post of SST BPS-16 while the appellant was ignored and the appellant preferred departmental appeal/ representation before the competent authority/ respondent, but no response has been given within the stipulated period.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That impugned inaction of the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be directed to not to proceeding of Departmental promotion committee (DPC) till the final disposal of the instant service appeal.

Dated: 06-08-2024

  
APPELLANT

THROUGH:

  
NOOR MUHAMMAD KHATTAK  
ADVOCATE SUPREME COURT

**AFFIDAVIT**

I, Gulzar Jan, (the appellant), do hereby solemnly affirm on oath that the contents of the above application are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.

  
DEPONENT

-6-

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

SERVICE APPEAL No \_\_\_\_\_ / 2024

**GULZAR JAN**

**VERSUS**

**GOVT: OF KPK & OTHERS**

**APPLICATION FOR CONDONATION OF DELAY, IF ANY, IN FILING  
OF TITLED APPEAL.**

Respectfully Sheweth:

- 1) That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2) That the appellant prays for the Condonation of delay in filing the above noted appeal on the following grounds inter alia:

**GROUND OF APPLICATION:**

- A- That valuable rights of the appellant are involved in this case hence the appeal deserves to be decided on merit.
- B- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather than technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.
- C- That the facts and grounds of accompanied service appeal may kindly be considered as integral part and parcel of instant application.
- D- That on the face of it, the applicant/ petitioner has got strong arguable case and is sanguine about its success.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, in filing the above titled service appeal may kindly be condoned in the interest of justice.

Dated: 06-08-2024

  
**APPELLANT**

THROUGH:

  
**NOOR MUHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

**AFFIDAVIT**

I, Gulzar Jan, (the appellant), do hereby solemnly affirm on oath that the contents of the above application are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.

  
**DEPONENT**



"A"  
-7-

DIRECTORATE OF EDUCATION (FATA) N.W.F.P. PESHAWAR.

APPOINTMENT/TRANSFER.

Consequent upon the completion of C.T. course this year, the following C.T. trainees are hereby appointed/adjusted temporarily on Rs.830/-P.M.fixed each or on their own pay and B.P.S. in case of those already in service in teaching cadre, whichever is higher, plus usual allowance as admissible under the rules with effect from the dates of their taking over charge but not before 1.9.88. in the school noted against their names. The trained candidates will be placed in regular scale from the date of declaration of the result:-

<u>S.No.</u>	<u>Name of Candidate/ Father's name.</u>	<u>Posted.</u>	<u>Remarks.</u>
1.	Haq Nawaz, B.Sc (Inservice). S/O Aka Khel.	G.H.S. Loi-Shelman, Khyber Agency.	Against a vacant C.T. post.
2.	Bakhtawar Shah, B.A. S/O Khadam Shah.	G...S. Janrud, (Khyber).	Against SV post vice Manzocr Khan transferred
3.	Mohammad Sher, B.A. S/O Alam Khan.	GHS Landi Kotal (Khyber).	Against a vacant C.T. post.
4.	Karar Khan, F.Sc. S/O Akhbar Khan.	..do..	...do...
5.	Qaisar Khan, M.A. S/O Nasir Khan.	GHS Janrud, (Khyber).	..do.. vice Lachi Gul C.T. transferred.
6.	Azeem Khan, B.A. S/O Said Alam Khan.	GHS Kamar Khel Attari(Khyber).	Against a vacant SV post.
7.	Noor Ali Shah, BA S/O Zari Shah.	GMS Musa Dara (FR Pesh:)	...do.. Vice Fazali Karim Karim promoted to SET post.
8.	Saiful Islam F.Sc, S/O Qadir Khan.	GHS Jana Kor (FR Pesh:)	Against a vacant SV post.
9.	Abdul Hafiz, B.Sc, S/O Abdul Mateen.	GMS Sara Mola(Orak:)	Against a vacant SV post.
10.	Rasool Khan, B.Sc, S/O Ajab Khan.	GHS Sandu Khel (Mohmand)	Against a vacant SV post.
11.	Janae Khan, B.Sc, S/O Hamidullah Jan.	GHS Gulistan(Orak:)	Against a vacant CT post.
12.	Wasiullah Khan, FSc, S/O Tasinullah.	GHS Jalaka Mola, (Orak:)	Against a vacant SV post.
13.	Abdul Jalil FSc, S/O Abdul Latif.	GMS Chapper Mashti, (Orakzai)	....do....
14.	Rehimdad, BA, S/O Hafiz Mohammad.	GMS Ghani Ada, (Bajour)	..do..
15.	Noor Hakim, FA, S/O Akbar Khan.	GHS Raghagan(Bajour)	Against a vacant SV post

Continued next page...2...

16. Said Wakeel F.Sc, S/O Umer Din. GHS Loi-Sam, (Bajour). Against a vacant SV post.
17. Gauhar Rehman FSc, S/O Badshah Gul. GHS Nawagai, (Bajour). ..do..
18. Anjad Hussain, FSc, S/O Khaista Khan. GHS Gardai (Bajour). --do--
19. Azizullah S/O Saifur Rohman, under order of posting at GHS Sandu Khel (Mohmand). GMS Sarqari Killa, (Bajour). Against a vacant CT post vice S.No.55.
20. Habib Hussain, FA, S/O Khidmat Hussain. GMS Dran Shekhan, (Orakzai). Against a vacant CT post.
21. Noor Hussain, BA, S/O Gul Hussain. GHS Toor Chapper, (FR Kohat). ...do.. vice Rooshan Ali transferred vice S.No.52.
- ✓ 22. <sup>Jan</sup> Gulzar F.A. S/O Abdullah Jan. GMS Jamu (FR Kohat). Against a vacant CT post.
23. Khushal Khan, FA, S/O Kamal Hussain. GMS Shindhand (FR Kohat). Against a vacant SV post.
24. Mohammad Ayub FA, S/O Khanan Khan. GHS Ara Khel, (FR Kohat). ..do...
25. Gul Salam, BA, S/O Aslam Khan. GHS Dara Adam Khel, (FR Kohat). Against a vacant CT post vice Mira Khan transferred S.No.53.
26. Nadir Khan, FA, S/O Maseet Khan. GMS Paya, (FR Kohat). Against a vacant SV post.
27. Taj Mohammad, BA S/O Jan Mohammad. GHS Miranshah (NWA) ..do..
28. Mohammad Ayub Nawaz, BA, S/O Gulat Khan. GMS Suleman Khel (Orakzai). Against a vacant SV post
29. Mr. Dil Abbass Khan, FSc, S/O Sher Zaman. GMS Gul Shah Jan Kot, (NWA). Against a vacant CT post Mukhtar Ahmad Khan CT already transferred.
30. Noor Wali Khan, FSc, S/O Mohammad Ali Shah. GHS Miranshah. (NWA) Against a vacant CT post.
31. Abdul Ali Shah, FSc, S/O Guldad Khan. GMS Paya Jan, (NWA). ...do...
32. Noor Alam Khan, FSc, S/O Sardar Ali. GMS Pir Samand Jan Kot (NWA). Against a vacant SV post.
33. Murad Khan, BSc, S/O Arab Khan. (Inservice). GMS Wateon (FR Bannu) Against a vacant CT post.
34. Zaitullah Khan, BA, S/O Gul Waris Khan. GMS Tor Karni, (Orakzai) Against a vacant SV post.
35. Zafar Ali Khan, FSc, S/O Gul Sardar. GMS Sarwar Jan (FR Bannu) Against a vacant CT post vice Rashid Khan.
36. Falak Naz, FSc, S/O Ghaziur Rehman. GMS Kotka Awal Khan, FR Bannu. Against a vacant CT post vice Gul Feroz.

Continued next page..3..

37.	Majid Gul, B.A. S/O Barbrak Khan.	GHS Uchhat, (Kurram).	Against a vacant SV post.
38.	Daulat Hussain, BA, S/O Zarwar Hussain.	GMS Dagar (Kurram).	Against a vacant CT post.
39.	Mohammad Jamil BA. S/O Alam Din.	GHS Jandana, (Kurram).	...do...
40.	Syed Ahmad Ali Shah, BA, S/O Syed Abdul Qasim.	GMS Ghuz Garhi (Kurram).	Against a vacant SV post.
41.	Mohammad Ishaq, FA. S/O Mohammad Ismail.	GMS Nakhazai, (Kurram).	Against a vacant CT post.
42.	Dilawar Khan, B.A. S/O Sher Dad Khan.	GMS Kari Kot, (SWA).	...do..
43.	Kalu Khan, BA, S/O Jalil Khan.	GMS Nano (SWA).	..do..
44.	Hussain Khan, FSc, S/O Ghazi Khol.	GMS Shahoor (SWA)	...do..
45.	Inam Khan FSc, S/O Saleem Khan.	GMS Hot Kai (SWA)	..do..
46.	Mohammad Nasir, F.Sc, S/O Rehman Khan.	GMS Attai Dawatani (SWA).	..do..
47.	Jamat Mir, BA, S/O Moena Dar Khan.	GMS Khingri, (F. D.I.K).	Against a vacant SE post.
48.	Shahi Jchan, FA, S/O Ghulam Jan.	GMS Old Sarwakai, (SWA).	..do.. a vacant C.T. post.
49.	Mumtaz Khan, FA, S/O Said Badshah.	GMS Morga (FR DIK).	...do... ..do..
50.	Loi Mohammad Khan, S/O Gulshan Khan.	GMS Zardana (SWA).	..do.. ....do...
51.	Rehim Khan, Ex-SV (Return from S/Leade, GHS Sargara Mohammad Khan, FR Bannu).	(MS Daloosa, (Crickai).	...do... a vacant SV post.

TRANSFER.

The transfer of the following C.T. teachers is hereby ordered:-

52.	Roosan Ali, C.T. GHS Toor Chapper, FR Kohat.	GHS Shahali Kawal (FR Kohat).	Against a vacant CT post.
53.	Mira Khan, C.T. GHS Dara Adam Khel, (FR Kohat).	GHS Akhurwal, (FR Kohat).	...do...
54.	Lachi Gul, CT, GHS Jamrud, (Khyber).	GHS Kamshilman, (Khyber).	..do...
55.	Hatibullah, C.T. GMS Sarqari Killa, (Bajour).	GMS Gardai, (Bajour).	...do...

Continued...

56.	Mohammad Badshah unt:SV, GHS Nawagai(Bajour).	GMS Dran, (Orak:)	Against a vacant SV post.
57.	Habibul Haq,unt:SV, GHS Gardai(Bajour).	GHS Uchat, (Kurrani).	...do...
58.	Ghaniullah, C.T. GHS Spulga(NWA).	GMS Khadi, (NWA).	Vice S.No.59.
59.	Mohammad Younas, C.T. . GMS Khadi(NWA).	GMS Spulga, (NWA).	Vice S.No.58.
60.	Manzoor Khan,SV,GHS Jamrud, (Khyber).	GMS Jabba, (Khyber).	Against a vacant SV post.

Notes:-

1. Charge reports should be submitted to all concerned.
2. Their appointments are being made on temporarily basis & are liable to termination at any time, without notice & without assigning reason. In case they wish to resign their posts they shall have to give one month's prior notice or forfeit one month's pay in lieu thereof. Their services will be terminated if they are not selected by the selection Committee.
3. The original qualification, date of birth & domicile certificate should be got checked before they are handed over charge of the post and attested copies thereof be kept on the record of school.
4. TA/DA etc. is not allowed on first appointment.
5. They should be sent to the Agency Civil Surgeon concerned for Medical Examination the day on which they report their arrival for duty and no pay should be drawn for them unless & until they produce their Health and Age Certificates from the said Surgeon.
6. Their verification roll of character and antecedents should be got completed and verified from the Authorities concerned.
7. The pay scale & service rules would be subject to revision in accordance with the orders to be passed by the Govt. of NWFP, from time to time.
8. They should not be handed over charge of the post if they are below (18) or above (30) years of age. If they fail to resume charge within two weeks their vacancies should be reported to this office ATONCE.
9. The candidate's knowledge in Islamic Education and Pakistan Studies must be judged before handing over the charge.

(HABIBULLAH KHAN)  
BY: DIRECTOR OF EDUCATION  
FATA, NWFP, PESHAWAR.

Continued next page..5..

..5..

ENDST: NO. 36134-70  
A-1/C.T./Under Training.

-11-  
Dated Pesh the 28/8 1988.

Copy forwarded for information and necessary action

to the:-

1. All the Agency Education Officers concerned.
2. All the Headmasters, Govt. High Schools concerned.
3. Candidates concerned.
4. VII-AE in local Directorate.
5. P.A. to Director of Education (FATA).

*H. J. Khan*  
BY: DIRECTOR OF EDUCATION  
FATA, NWFP, PESHAWAR.

*28/8/88*

G. Abbas. /

S. No. 0457815

Roll No. 23495

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

"B"-12-

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 1984 (ANNUAL)

THIS IS TO CERTIFY THAT Gul Zar Jan

Son/Daughter of Abdullah Jan

and a student of Govt: High School, Akhorwal (FR) Kohat.

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Peshawar held in April 1984 as a *Regular candidate*. He/She obtained 467 Marks out of 850 and has been placed in Grade  C  Representing Good.

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat
4. Gen Science.
5. Pak Studies.
6. Isl History.
7. Gen Mathematics.
8. Pashto.

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

Date of birth according to admission form is Third March,  
one thousand nine hundred and Sixty Eight (3-3-1968)

Asstt. Secretary

9th August 1984

Secretary

This certificate is issued without alteration or erasure.

Principal  
Govt: High School  
Akhorwal (FR. Kohat)

s.No 179896

Roll No. 19043

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

-13-

# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



## Peshawar N.W.F.P. Pakistan INTERMEDIATE EXAMINATION

Humanities Group  
SESSION SUPPLEMENTARY 1986

THIS IS TO CERTIFY THAT Gul Zar Jan

Son/Daughter of Abdullah Jan

and a resident of Kohat District.

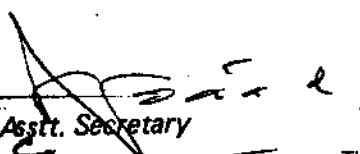
Registered No. 118-B/DAK-84 has passed the *Intermediate Examination* of

the Board of Intermediate & Secondary Education, Peshawar held in December 1986

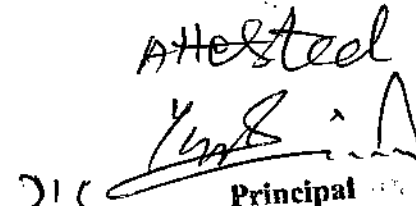
as a *Private candidate*. He/She obtained 467 Marks out of 1100

and has been placed in Grade  Representing Fair

The Examination was taken ~~as a whole~~ whole in parts.

  
Asstt. Secretary

*This certificate is issued without alteration or erasure.*

  
Principal  
Govt: High School  
Akhurwal (FR. Kohat)

  
Secretary



# UNIVERSITY OF PESHAWAR

BACHELOR OF EDUCATION EXAMINATION 1997 ANNUAL 14-

Detailed Marks Certificate No: 004039

Mr. / Ms. Gulzar Jan Roll No. 2660

Divisions : (Theory I ..... Practice of Teaching I ..... Aggregate Second...)

SUBJECTS	M A R K S		
	MAXIMUM	O B T A I N E D	
		In Figures	In Words
Educational Psychology ..	100	41	Forty one
Principles of Education ..	100	44	Forty four
School Organisation and Health Education ..	100	46	Forty six
History of Education ..	100	47	Forty seven
Teaching of <u>English</u> ..	100	52	Fifty two
Islamiyat / Islamic History ..	100	60	Sixty only
Elective <u>Urdu</u> ..	100	40	Forty only
Optional <u>Guidance</u> ..	100	40	Forty only
Practice of Teaching ..	200	110	One hundred & ten only
<b>Total</b> ..	<b>1000</b>	<b>480</b>	<b>Four hundred &amp; eighty only</b>

Errors & omissions are subject to subsequent rectification.

The Examination was taken as a ~~WHOLE~~ / IN PARTS.

Result Declared on 30 APR 1997

Date of Issue 26/5/97

*[Signature]*  
 Controller of Examinations,  
 University of Peshawar,  
 Pakistan.

*[Signature]*  
 Attested  
*[Signature]*  
 Principal  
 Govt. High School  
 Akhurwal (FR. Kohat)





# University of Peshawar (Pakistan)

Session ANNUAL 1996

GULZAR JAN Son of ABDULLAH JAN and a student

of KOHAT DISTRICT having passed the prescribed examination  
in NOVEMBER 1996, is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Education

In the SECOND Division in Theory  
In the SECOND Division in Teaching Practice  
In the SECOND Division in Aggregate

He/She also passed GUIDANCE as additional / optional subject.  
The Examination was taken as ~~a whole~~ / in parts.

Serial No. 006969

Registered No. 88-P/A-32814

Enrolment No. 2660

Result declared on APRIL 30, 1997



*Attested*  
*[Signature]*  
Principal  
Govt. High School  
Akhurwal (F.K. Kohat)

*Fazli Hameed*  
Registrar

Countersigned

*[Signature]*  
Vice-Chancellor

-15-

- 16 -

# University of Peshawar

(PAKISTAN)  
PASSED // RE APPEAR

66503

## Detailed Marks Certificate

### B. A. EXAMINATION, 1992 ANNUAL

Mr./Ms. Gulzar Jan

Roll Number 66503

The candidate secured the following marks and is placed in III Division.

SUBJECTS	MARKS		In words
	allotted	obtained	
1. ENGLISH	150	49	Forty Nine
2. <del>Urdu</del>	150	68	Sixty Eight
3. <del>Islamic studies</del>	150	50	Fifty only
4. PAKISTAN STUDIES	40	17	Seventeen
5. ISLAMIC STUDIES (Compulsory)	60	28	Twenty Eight
Total	550	212	Two hundred & Twelve

The Examination was taken as a  WHOLE /  IN PARTS

Date: 21-11-1993

*Attested*

*[Signature]*

Principal  
Govt: High School  
Akhurwal (FR. Kohat)

CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR  
PAKISTAN

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# University of Peshawar (Pakistan)

Session ANNUAL 1992

GUL ZAR JAN / SON OF ABDULLAH JAN / and a student  
of KOHAT DISTRICT / having passed the prescribed Examination  
held in AUGUST 1992, is this day admitted by the University of Peshawar

## to the Degree of Bachelor of Arts

in the THIRD Division

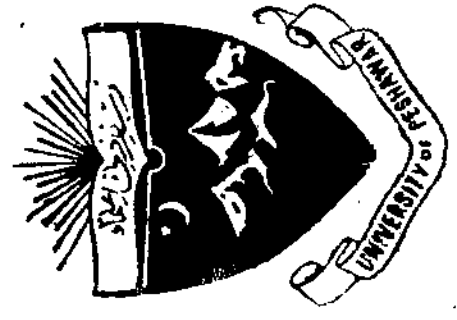
The Examination was taken as ~~ex-ophex~~ in parts

Serial No: 017600

Registered No. 88-FA-32854

Roll No. 66503

Result Declared on MARCH 6, 19 93



*Shakil Ahmad*  
Registrar

*Attested*  
*[Signature]*  
Principal  
Govt. High School  
Akhurwal (F.A. Kohat)

Countersigned  
*[Signature]*  
Vice-Chancellor

-18-

# EDUCATION DEPARTMENT, N.-W.F.P., PESHAWAR,



## CERTIFICATE OF TEACHING.

Marks obtained ... 539/1200 ... /1000

ROLL NO... 40.....

Division... .. Third.....

Certified that..... Gulzar Jan.....

born on... 3-3-1968..... (Third March..... Nineteen hundred and Sixty Eight.....)

Sen/Daughter of... .. Abdullah Jan.....

resident of..... XXXX..... Tehsil..... XXXX..... District..... F.R. Kohat..

having passed the Certificate of Teaching Examination held in 19 89 is qualified to teach in the Middle Department of an Anglo-Vernacular School.

Trained at the Government Training School, ..Private.....

Dated Peshawar,

The..... 26-8-1989..... 19 ..

*Attested*  
*[Signature]*  
Principal  
Govt. High School  
Akhurwal (F.R. Kohat)

*[Signature]*  
Registrar, 3/8/89  
Departmental Examinations,  
Education Department, Peshawar.

19-11-88

Service Certificate

It is certified that Mr Gulzar Jan  
S/O Abdullah Jan has been working  
in education department since 01-9-1988.  
Now he is working against S.I post  
at G.H.S Akhural F.R. Kohat.

Principal,  
Govt. High School  
Akhural F.R. (Kohat)

Relieving chit

"D"-20-

Mr Gulzar Jan, you are upgraded to BPs 16 and transferred to GHS Akhural FR Kohat, vide no 713-15 dated 18-4-2014

You are hereby relieved to your duty on 22-4-2014 A.M and directed to report to the principle GHS Akhural in due course of time.

*He L. J. J.*

Head Master  
G.M.S Landi Khel  
F.R Kohat

Headmaster

G.M.S Landi Khel



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

hfc -21-

-22-

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

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least <u>second class</u> Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="padding-left: 40px;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

-23-

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

(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

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

(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No

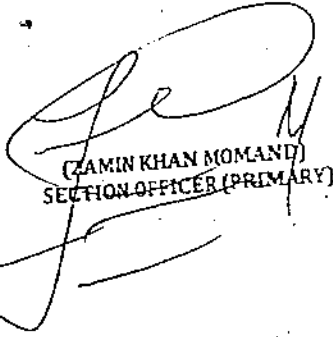
-25-

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

Endst : of even No & date:

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

  
(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

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**OFFICE OF THE AGENCY EDUCATION OFFICER**  
**F.R KOHAT**  
 Gate No.2 K.D.A Kohat  
 Phone & Fax No. 0922-9260321

No. 568-87/1 Dated: 12/10/2017

**Promotion/Adjustment of SST (M)**

In pursuance of the Government of Khyber Pakhtunkwa Elementary and Secondary Education Notification No.SO(PE)/ 4-5/ SSRC/Meeting/2013/Teaching Cadre dated 24<sup>th</sup> July,2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs,SATs/ATS,STTs/TTs, Senior Qaris/Qaris,PSHTs/PSTs of FR Kohat, are hereby promoted to the post of SST (Bio-Chem),SST (Phy-Maths),SST (General) noted against each in BPS-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and condition given below, with immediate effect in the interest of public service.

SNo	Name	Designation	From	Adjusted at	Remarks
<b>Male</b>					
1	Gul Muhammad	S.CT (Bio,Chem)	GHS Ara Khel	GHS Ara Khel	Promoted to SST post Against Vacant SST Post
2	Hukam Khan	S.CT (Bio,Chem)	GHS TIK	GHS Torchapper	-Do-
3	Muhammad Bilal	HPST (Bio,Chem)	GPS Bazi Khel	GHS Shpalkiwal	-Do-
4	Hazrat Noor	S.AT (BIO,Chem)	GHS Suni Khel	GHS Suni Khel	-Do-
5	Shoaib Khan	S.CT (Math,Phy)	GHS Shen Dhand	GHS Shen Dhand	-Do-
6	Anwar Khan	TT (Math,Phy)	GHS Bosti Khel	GHS Bosti Khel	-Do-
7	Gul Rehman	S.CT (Gen)	GHS Suni Khel	GHS Kohi wal	-Do-
8	Yar Said	S.CT (Gen)	GHS Akhurwal	GHS Akhurwal	-Do-
9	Khushal Khan	S.CT (Gen)	GHS Dara	GHS Sheraki	-Do-
10	M.Ayyub	S.CT (Gen)	GHS Shen Dhand	GMS Jammu	-Do-
11	Aurangzeb	S.CT (Gen)	GHS Dara	GMS Gadia Khel	-Do-
12	M.Mukhtiar	HPST(Gen)	GPS Taimer Khel	GMS Donga Taimer Khel	-Do-
13	Khan Muhammad	SPST(Gen)	GPS Tor Tandi	GMS Chariba	-Do-
14	Saif Ur Rehman	S.DM(Gen)	GHS Ara Khel	GMS Guz Dara	-Do-
15	Mujahid Khan	S.Qari(Gen)	GHS Paya	GHS TIK	-Do-
<b>Female</b>					
16	Shahida Jabeen	S.CT (Gen)	GGHS Pirwal Khel	GGHS Pirwal Khel	-Do-
17	Nelofer Najeeb	S.CT (Gen)	GGHS M.Husain Mela	GGHS M.Hussain Mela	-Do-
18	Sabra Sultana	HPST (Gen)	GGPS Abdul Aman Kaly	GGHS TIK	-Do-
19	Kousar Bibi	S.DM (Gen)	GGHS M.Hussain Mela	GGMS Bilal Kaly	-Do-
<b>Consequential Transfer</b>					
20	Jamshid Khan	SST (Bio,Chem)	GHS Shpalki wal	GHS Sheraki	-Do-

**Terms and Conditions:-**

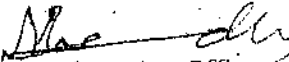
1. They would be on probation for a period of one year extendable for a further period of one year.
2. They will be governed by such rules and regulations as and when issued from time to time by the provincial Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. No TA/DA is allowed for joining his duty.
6. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/she will be reverted.
7. Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
8. The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the AEO concerned.

(Haji Masaud Khan Afridi)  
Agency Education Officer  
F.R Kohat.

CC:

Forwarded for information and necessary action.

- 1: Director of Education FATA with ref to your Endst No 15200-51 and 15251-300 dated: 11-10 -2017.
- 2: DAO Kohat.
- 3: All candidates concerned.
- 4: All Head of Institution concerned.
- 5: AEOs Male and Female in the Local Office.
- 6: Office Record.

  
Agency Education Officer  
F.R Kohat.

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Final Seniority List of C/T Male Teachers in R/O TSD Darra Kohat Corrected up to 31/07/2022

S#	Seri No.	NAME	FATHER NAME	School	D/O Birth	Desig	SPS	Qualification		D/O Ist App:	D/O promo:	Domicile	Remarks
								Acad:	Prof:				
1	1	Khalil Ur Rehman	M. Alam	GHS Akhurwal	23/03/65	S.CT	16	BA	CT	03-01-87	15/04/2014	SWA	NO B.Ed
2	2	Abdul Ghafar	Mia Gul	GHS Tor Chapper	15/04/65	S.CT	16	BA	DIE	08-09-88	15/04/2014	Charsada	NO B.Ed
3	3	Gul Zar Jan	Abdullah Jan	GHS Akhurwal	03-03-68	S.CT	16	BA	CT/B.Ed	26/08/1989	15/04/2014	F.R Kohat	BA 3 <sup>rd</sup> Division
4	4	Younas Khan	Feroz Khan	GHS Bosti Khel	16/03/65	S.CT	16	MA	CT/B.Ed	25/12/1993	15/04/2014	F.R Kohat	
5	5	M. Aziz	Sher Afzal	GHS Sheendhand	02-02-69	S.CT	16	MA	CT/B.Ed	25/12/1993	15/04/2014	F.R Kohat	Physic Maths
6	6	Shafiq khan	Mehrab Din	GHS Dara Adam Khel	04-06-69	S.CT	16	MSc	CT/M.Ed	25/12/1993	15/04/2014	F.R Kohat	
7	7	Taj Muhammad	Wazir Khan	GHS T.I Khel	01-03-68	S.CT	16	MA	CT/M.Ed	09-01-94	15/04/2014	F.R Kohat	
8	8	Raz Muhammad	Yar Muhammad	GHS Bosti Khel	11-07-68	S.CT	16	BSc/Bio: Chem	CT/M.Ed	11-02-94	15/04/2014	F.R Kohat	
9	9	M. Shafi	Pir M. Shah	GHS Akhurwal	03-02-65	S.CT	16	MA	CT/M.Ed	18/11/1994	15/04/2014	F.R Kohat	
10	10	Sabir Khan	Wajal Khan	GHS Bosti Khel	13/04/67	S.CT	16	MA	CT/B.Ed	15/01/1995	15/04/2014	F.R Kohat	
11	11	M. Akram	Loban Shah	GHS Ara Khel	04-10-66	S.CT	16	MA	CT/B.Ed	10-09-95	30/05/2018	F.R Kohat	
12	12	Said Habib	Ghulam Habib	GHS Paya	20/05/66	S.CT	16	BA	CT/B.Ed	10-09-95	30/05/2018	F.R Kohat	
13	13	M. Ishaq	Yar Muhammad	GHS Dara Adam Khel	01-08-69	S.CT	16	BA	CT/B.Ed	10-09-95	30/05/2018	F.R Kohat	
14	14	Sayedna Hussain	Sawan Khan	GHS Bosti Khel	04-10-69	S.CT	16	MA	CT/M.Ed	16/10/1995	30/05/2018	F.R Kohat	
15	15	Asghar Khan	Mewa Khan	GHS Tor Chapper	12-10-70	S.CT	16	MSc Pak St	CT/B.Ed	18/10/1995	30/05/2018	F.R Kohat	
16	16	Ihsan Ud Din	Subhan Ud Din	GHS Darra Adam Khel	30/03/66	S.CT	16	MA	CT/M.Ed	25/10/1995	30/05/2018	F.R Kohat	BA 3 <sup>rd</sup> (D)
17	17	Naseeb Gul	Mehraj Gul	GHS Akhurwal	28/06/67	S.CT	16	BA	CT/B.Ed	25/10/1995	30/05/2018	F.R Kohat	
18	18	Khalil ur Rehman	Naiz Mir	GHS Sheraki F.R.KT.	15/01/69	S.CT	16	MA	CT/M.Ed	25/10/1995	30/05/2018	F.R Kohat	
19	19	Gul Munir	Iqbal Khan	GHS Sumi Khel F.R.KT	15/01/68	S.CT	16	MA	CT/B.Ed	11-05-95	30/05/2018	F.R Kohat	

20	20	M. Yousaf	M. Rafiq	GHS Paya	15/11/65	SCT	16	BA	CT/BEA	14/12/1995	25/02/2020	F.R Kohat	promoted
21	21	Sultan-e-Room	Sherzada	GHS Dara Adam Khel	01-06-66	S.CT	16	MA	CT/MEA	15/12/1996	25/02/2020	F.R Kohat	promoted
22	22	Shams ur Rehman	Abdul Hakim	GHS T.I Khel	12-07-68	S.CT	16	MA	CT/BEA	15/02/1996	25/02/2020	F.R Kohat	promoted
23	23	Shahid Anwer	Abdur Rashid	GHS Shpalkiwal	11-11-70	SCT	16	BA	CT/MEA	19/09/1998	25/02/2020	F.R Kohat	promoted
24	24	Jamal Din	Azam din	GHS Darra Adam Khel	15/05/72	SCT	16	MA	CT/BEA	21/09/1998	25/02/2020	F.R Kohat	promoted
25	25	M.Nawaz	Subhan Ud Din	GMS Jamnu	04-08-70	S.CT	16	BA	CT	22/09/1998	25/02/2020	F.R Kohat	promoted
26	26	Nasir Khan	Zarwali Khan	GMS Sheraki Bali	01-01-72	SCT	16	BA	CT/BEA	23/09/1998	12-03-21	F.R Kohat	promoted
27	27	Azmat Khan	Abdur Rehman	GHS Darra Adam Khel	02-05-74	SCT	16	MA	CT/BEA	23/09/1998	12-03-21	F.R Kohat	promoted
28	28	Gul Ali Khan	Aman Gul	GMS Guz Darra Jawaki	03-03-75	CT	16	MA	BEA	23/09/1998		F.R Kohat	1 Step
29	29	Zar Saeed	Abdul Ghafoor	GHS Toor Chapper	19/12/68	CT	16	BA	CT/BEA	09-01-99		F.R Kohat	1 Step
30	30	Nazir Khan	Bahadur Khan	GHS Shpalkiwal	10-09-69	CT	16	MSc	CT/MEA	12-07-00		F.R Kohat	1 Step
31	31	Yar Muhammad	Khan Zaman	GHS Sheraki	12-12-71	CT	16	MA	CT/BEA	12-08-00		F.R Kohat	1 Step
32	32	M.Arif	Munawar Khan	GMS Landi Khel	27/05/66	CT	16	MA	CT/MEA	01-09-01		F.R Kohat	1 Step
33	33	Ahmad Khan	Namoos Khan	GMS Toor Tandi	04-01-69	CT	16	BA	CT/BEA	09-01-03		F.R Kohat	1 Step
34	34	Abdul Qayum	Sher Ahmad	GHS Ghariba	18/4/1969	CT	16	MSc PS	CT/MEA	09-01-03		F.R Kohat	1 Step
35	35	Fazal Muhammad	Shekh Muhammad	GMS Sra Mela	26/11/69	CT	16	BA	CT/BEA	09-01-03		F.R Kohat	1 Step
36	36	Habib Ur Rehman	Gul Mast Khan	GHS Toor Chapper	09-01-71	CT	16	MA	CT/MEA	09-01-03		F.R Kohat	1 Step
37	37	M.Qazafi	Sultan Muhammad	GHS T.I Khel	15/03/74	CT	16	MA	CT/MEA	09-01-03		F.R Kohat	1 Step
38	38	Lal Muhammad	Abdul Habib	GMS Jamnu	13/06/74	CT	16	MA	CT/BEA	10-01-03		F.R Kohat	1 Step
39	39	Said Maeen	Mir Aslam	GHS Akhurwal	01-05-77	CT	16	MA	CT/MEA	01-01-04		F.R Kohat	1 Step
40	40	Abdul Haq	Muqarrab Khan	GHS Bosti Khel	03-01-79	CT	16	MA	CT/MEA	12-02-04		F.R Kohat	1 Step
41	41	Sheraz Khan	Yar Badshah	GMS Samandi Mela	12-03-79	CT	16	MA	CT	31/03/2007		F.R Kohat	1 Step
42	42	Faisal Shahab	Shah Nawaz	GHS Toor Chapper	08/02/81	CT	16	MSc	CT/BEA	31/03/2007		F.R Kohat	1 Step
43	43	Aqal Wazir	Shah Zaman	GMS Kohiwal	15/02/77	CT	16	MA	CT	04-02-10		F.R Kohat	1 Step
44	44	Abdur Rahim	Lal Baz	GHS Paya	17/02/80	CT	16	MA	CT/BEA	04-06-10		F.R Kohat	1 Step
45	45	Aziz Ur Rehman	Ajmal Khan	GMS Donga Jamner Khel	02-12-66	CT	15	BA	CT	14/02/2014		F.R Kohat	



46	46	Nabi Ur Rehman	Khibaz Khan	GMS Kohiwal	25/04/72	CT	15	BA	CT/B.Ed	14/02/2014		F.R Kohat
47	47	M.Nadim	Wilayat Khan	GMS Jammu	04-01-73	CT	15	BA	CT/B.Ed	14/02/2014		F.R Kohat
48	48	Manzoor Khan	Zahir Khan	GMS Donga Farmer Khel	03-12-85	CT	15	BA	CT	09-01-15		F.R Kohat
49	49	Ahmad Khan	Dilawar Khan	GMS Sra Mela Bosti Khel	03-01-82	CT	15	MA	CT/B.Ed	23/09/2015		F.R Kohat
50	50	Matti Ullah	Munawar Khan	GHS Sheraki	01-12-77	CT	15	MA	CT/Bed	23/12/2015		F.R Kohat
51	51	Ihsan Mumtaz	Mamtaz Ali	GHS Sheraki	15/10/1987	CT	15	MA	CT/B.Ed	26/09/2017		F.R Kohat
52	52	Shahid Ullah	Ashraf Noor	GHS Paya	07-01-84	CT	15	MA	CT/B.Ed	26/09/2017		F.R Kohat
53	53	Noor Asghar	Noor Ahmad	GHS Suni Khel	12-10-82	CT	15	MA	CT/B.Ed	26/09/2017		F.R Kohat
54	54	Gul Asghar	Gul Akbar	GHS Bosti Khel	01-03-85	CT	15	BA	CT	20/10/2017		
55	55	Qaiser Khan	Bilal Khan	GHS Ara Khel	06-12-74	CT	15	MA	CT/B.Ed	16/11/2017		F.R Kohat
56	56	M.Tahir	Daria Khan	GHS Ara Khel	15/03/74	CT	15	MA	CT/B.Ed	16/11/2017		F.R Kohat
57	57	Himat Khan	Banaras Khan	GHS Ara Khel	13/03/75	CT	15	BA	CT	16/11/2017		F.R Kohat
58	58	Mujeeb Alam	Sahib Alam	GHS Akhurwal	04-08-73	CT	15	MA	CT/B.Ed	16/11/2017		F.R Kohat
59	59	Noor Zadin	Sharaf Din	GMS Samandi Mela	10-11-75	CT	15	MA	CT/Bed	16/11/2017		F.R Kohat
60	60	Mir Hassan	Noor Hassan	GHS Sheraki	09-01-77	CT	15	BA	CT/Bed	16/11/2017		F.R Kohat
61	61	Nasir Khan	Banaras Khan	GMS Nazim Kaly	01-01-78	CT	15	MA	CT/B.Ed	16/11/2017		F.R Kohat
62	62	M.Sharif	Akram Khan	GMS Toor Tandi	13/04/74	CT	15	MA	CT/B.Ed	16/11/2017		F.R Kohat
63	63	Muhammad Nawaz	Khana Jan	GHS Bosti Khel	04-10-70	CT	15	BA	B.Ed	2020		F.R KT.
64	64	Muhammad Asif	Saleem Khan	GHS Ara Khel	17/12/1977	CT	15	MA	B.Ed	2020		F.R KT.
65	65	Umer Habib	Ghulam Saleh	GHS Ghariba	25/03/1972	CT	15	MA	CT/Bed	15/10/2019		F.R KT.
66	66	Noor Rahim	Hakeem Khan	GMS Gadia Khel		CT	15	MA		05-07-20		F.R Kohat
67	67	Wajid Niaz	Niazmin Khan	GMS Ibrahim Khel		CT	15			05-07-20		F.R Kohat

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68	68	Mohib Ullah	Nadar Khan Afridi	GHS Darra Adam Khel	04-08-97	CT	15			11-01-21		F.R Kohat
69	69	Shah Zeb	Naseer Khan	GHS SHEEN DHAND TSD DARRA KOHAT	01-02-94	CT	15			15/9/2022		F.R Kohat
70	70	Waqas Ahmed	Chamand Gul	GHS DARRA TSD DARRA KOHAT	17/3/1993	CT	15			15/9/2022		F.R Kohat
71	71	Muhammad Qasim	Chamand Gul	GHS DARRA ADAM KHEL	04-10-97	CT	15			15/9/2022		F.R Kohat
72	72	Muslim Khan	Gul Faraz	GHS DARRA TSD DARRA KOHAT	18/3/1999	CT	15			15/9/2022		F.R Kohat
73	73	Muhammad sohail usama	Abbas Ali khan	GHS SHEEN BALA TSD DARRA KOHAT	04-07-95	CT	15			15/9/2022		F.R Kohat
74	74	MUHAMMAD ZAHID	WAHEED BADSHAH	GMS NAZIM KALLAY TSD DARRA KOHAT	24/10/1996	CT	15			15/9/2022		F.R Kohat
75	75	Hameed ullah	Jalil khan	GHS SHEEN DHAND TSD DARRA KOHAT	01-12-90	CT	15			15/9/2022		F.R Kohat
76	76	Hassan ayaz	Riaz khan	GHS SHEEN TSD DARRA KOHAT	15/03/1995	CT	15			15/9/2022		F.R Kohat
77	77	FARMAN ULLAH KHAN	AMAN ULLAH KHAN	GHS Tor Chapar TSD Darra Kohat	08-08-94	CT	15			15/9/2022		F.R Kohat

CERTIFICATES

1. That the said seniority is not subjadice in court
2. that said senirotly is final and no apeal is panding against the seniority list in this office.

(Muhammad Sheraz)  
District Education Officer  
TSD Darra Kohat

Endst NO \_\_\_\_\_ Dated \_\_\_\_\_

Copy of the above is to the :-

All the Principal Head Master and head teachers

Assistant D.E.O (Male)  
TSD Darra Kohat

(Muhammad Sheraz)  
District Education Officer  
TSD Darra Kohat

**Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar**

No. 3702-36 No./01/Promotion To SSTs/2023/Estab-1 (M)  
Dated Peshawar the 03/06/2024



**Subject - DPC MEETING SCHEDULE FOR THE DEFERRED PROMOTION CASES  
(IN CONTINUATION OF THE DPC MEETING DATED 10/10/2023) OF SCT/CT, SAT/AT,  
ST/TT, SDM/DM, S. GARNIGARI, PSHT/SPST/PST & CT/TT) TO THE POST OF SST(G),  
SST (Bio/Chem), SST(Maths/Physics) & SST(IT) BPS-16**

All District Education Officers  
(Male) Khyber Pakhtunkhwa.

I am directed to refer to the subject noted above and to state that in continuation of DPC meeting dated 10/10/2023, a meeting of the Departmental Promotion Committee has been scheduled to be held on 12/06/2024 at 10:00 AM in the committee room of this Directorate

I am, further, directed to ask you to submit all the requisite documents of the deferred cases before 06/06/2024 for onward submission to the admin department and also attend the subject DPC meeting on 12/06/2024 with provision of a certificate to the effect that the seniority lists are updated. (In) investigated and not subjective

*[Signature]*  
03/06/24  
Assistant Director (Estab-M-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

- Copy forwarded to the -
- 1 Deputy Secretary/ISO (PE) E&SED Khyber Pakhtunkhwa with the request to attend the DPC Meeting on 12-06-2024, Please
  - 2 P A to Director E&SE Khyber Pakhtunkhwa
  - 3 Master File

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

4H  
-33-

To

The Director (E&SE) Department,  
Khyber Pakhtunkhwa, Peshawar.

"I"

-34-

**Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED**  
**SERVICE RULES NOTIFIED DATED 24/07/2014 TO THE**  
**EXTENT OF SERIAL NO. 1 (B) COLUMN NO 03, SECOND**  
**CLASS BACHELOR DEGREE AND WHEREBY JOINERS TO**  
**APPELLANT HAS BEEN PROMOTED TO THE POST OF SST**  
**BPS-16 WHILE THE APPELLANT WAS IGNORED AND**  
**REQUEST FOR STOPPAGE OF DPC.**

**Respected Sir!**


- 1) That appellant was initially appointed as CT BPS-15 on temporarily basis vide order 28/08/1988, and start performing his duties quite efficiently and to the entire satisfaction of his superior.
- 2) That the appellant was appointed by the respondents department on the qualification of Matric and FA/FSc while the appellant was obtain the Bachelor of Education, Bachelor of Arts degree during his service and got 3<sup>rd</sup> division, the appellant also obtain certificate of teaching from Department of Education.
- 3) That the appellant was performing his duty in respondents department, the respondents department awarded him service certificate and relieving chit and appellant was upgraded to BPS-16 and transferred to GHS Akhurawal FR Kohat vide no 713-15. dated 18-04-2014.
- 4) That in light of the ibid appointment order the appellant submit his charge report and accordingly relived from his prewise post, started performing his duties quit efficiently and up to the entire satisfaction of his superior. That the department issued notification dated 24/07/2014 in which the criteria was fixed for the post of Secondary School Teacher (BPS-16) is at least second class bachelor degree and seventy five percent by promotion.
- 5) That on dated 12/10/2017 Departmental Promotion Committee was conducted in which all the employees were promoted/Adjusted against the post of SST but the department

ignored the appellant for promotion/Adjustment against the post of SST.

- 6) That department issued final seniority list of the Certified Teachers on dated 31/07/2022 the appellant was placed is at serial no 03 of the seniority list and was eligible for promotion but the department ignored the appellant for promotion without any reason and clear justification while juniors to appellant have been promoted to the post of SST BPS-16.
- 7) That the department issued another office order dated 03/06/2024 for schedule of Departmental Promotion Committee for the differed promotion cases against the post of SST's, CT's, SAT's held on 12/06/2024.
- 8) That felling aggrieved appellant preferred the instant departmental appeal before your honor, because the department by not deleting the condition of B.A /BSc Second division and not allowing the third divisioner for promotion to the post of SST (BPS-16) is against the law, facts and norms of natural justice.
- 9) That the impugned Notification dated 24-07-2014 by ignoring the appellant/3<sup>rd</sup> divisioner from promotion to the post of SST BPS-16 is against the law and norms of natural justice. That the department by not considering the appellant/3<sup>rd</sup> divisioner for promotion to the post of SST is against the law, facts and norms of natural justice.

It is therefore most humbly prayed that on acceptance of this appeal, the impugned Notification dated 24-07-2014 of the department may very kindly be rectified/modified by deleting the condition of B.A/ Bsc Second Division in Column No.3, Serial No 1 (B), which is required for promotion to the post of SST (BPS-16) and the respondents may kindly be directed to consider the appellant for promotion to the post of SST BPS-16 w.e.f 12.10.2017 with all back benefits including seniority and a direction for stoppage of DPC may kindly be issued.

Dated 05.06.2024

  
Gulzar Jan,  
SCT BPS (16),  
GHS Akhurwall, District  
Kohat.

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

Appca No 12024

Gulzar Jan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Edu Deptt

(RESPONDENT)  
(DEFENDANT)

I/We Gulzar Jan

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated.      /      / 202



**CLIENT**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

  
**WALEED ADNAN**

  
**UMAR FAROOQ MOHMAND**

  
**KHANZAD GUL**

&

  
**ABID ALI SHAH  
ADVOCATES**

**OFFICE:**

Flat No. (TF) 291-292 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)