

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2296/2023

Sakhi Muhammad.....Appellant

VERSUS

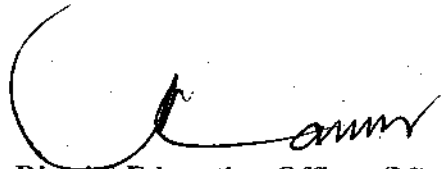
Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

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Dated: 20/08/2024


District Education Officer (M)
Haripur.
(Respondent No. 4)

25-9-24
A-Abdul

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP COURT ABBOTTABAD.

Appeal No. 2296/2023

Sakhi Muhammad.....Appellant

VERSUS

Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

RESPECTFULLY SHEWETH:-

**Khyber Pakhtunkhwa
Service Tribunal**

Comments on behalf of Respondents are submitted as under:-

Date: 15/7/24
13-09-2024

Preliminary objection:-

1. That the appellant has no cause of action to file the instant appeal against the answering respondents.
2. That the appeal of the appellant is time barred. Hence liable to be dismissed without any further proceeding.
3. That the Departmental Promotion Committee (DPC) was held on 19-10-2020 for the district cadre post to SST G, SST Bio/ Chemistry & SST Math/Physics wherein promotion to SST Maths/Physics from Senior Qari / Qari under 3 % share was not considered due to quota not applicable (0.42 which is less than 0.50) hence, appellant is not eligible for promotion against the said quota.
4. That this Honorable Tribunal has got nothing to do with the fitness for promotion case as per reported judgment 2013 SCMR 99 is very much clear in this regard hence, instant service appeal is liable to be dismissed without further proceedings.
5. That the instant appeal is not maintainable in its present form.
6. That the appellant has filed the present appeal just to pressurize the respondents.
7. That no junior Senior Qari BPS-15 has been promoted against the post of SST (M/P).

Qari

- 8. That appellant neither annexed the copy of postal receipt alongwith his departmental appeal nor mentioned the date on his departmental appeal hence, the appeal in hand is not maintainable in its present form.
- 9. That the appellant has not come to this Honorable Tribunal with clean hands hence, not entitled for any relief.
- 10. That the appellant is estopped to sue due to his own conduct.
- 11. That the instant appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.
- 12. That the instant appeal is against the Service Laws / existing policy.

Factual Objections:-

- 1. That the Para No. 01, of the service appeal relates to the service record of the appellant hence, need no further comment.
- 2. That the Para No. 02, of the service appeal also relates to the promotion record of the appellant.
- 3. That the Para No. 03, of the service appeal relates to the service record of the appellant hence, need no further comment.
- 4. That the Para No. 04, of the service appeal relates to record hence, need no further comment.
- 5. That the Para No. 05, of the service appeal as composed is incorrect hence, denied
As per Notification No. SO (PE)4-5/SSRC/Meeting/2013/Teaching Cadre dated 24-07-2014, 3 % share is reserved from amongst the Senior Qari with atleast 05 years service against the post of SST and no junior Senior Qari BPS-15 has been promoted against the post of SST (M/P). The meeting of Departmental Promotion Committee (DPC) was held on 19-10-2020 and the case of promotion of Senior Qari to SST M/P BPS-16 was considered vide item No. 03 and the DPC recommended as under:

Total No. of Vacant Post of SST (P/M)	14
25% initial recruitment of SST (P/M)	3
75% Promotion Quota of SST (P/M)	11
3% S.Qari/Qari Quota to SST (P/M)	0.42
Posts available for promotion to SST (P/M)	The Quota is not applicable
Proposed S.Qari/Qari for promotion to SST (P/M)	0

However, in the remarks column against the name of appellant **erroneously** mentioned as "considered suitable for promotion to the post of SST (G) in BPS-16 on regular basis with immediate effect." and same was intimated to respondent No. 4 vide letter Endst: No. 2006/F.No. Clarification of Minutes/2020/Haripur dated 07-08-2024. Hence, appellant could not be promoted due to less share for

promotion against said quota. (Copy of Notification dated 24-07-2014, Minutes of Meeting & letter Endst: No. 2006/F.No. Clarification of Minutes/2020/Haripur dated 07-08-2024 are annexed as Annexure "A", "B" & "C" respectively)

- 6. That the Para No. 06, of the service appeal relates to record.
- 7. That the Para No. 07, of the service appeal relates to record.
- 8. That the Para No. 08, of the service appeal as composed is incorrect hence, denied. Comprehensive reply has already been given in Para No. 05 of the factual objections.
- 9. That Para No. 09, of the service appeal as composed is incorrect hence, denied. Comprehensive / detailed reply has already been given in Para No. 05 of the factual objections.
- 10. That the Para No. 10, of the service appeal as composed is incorrect hence, denied.
- 11. That Para No. 11, of the service appeal as composed is incorrect hence, denied. As replied above.
- 12. That Para No. 12, of the service appeal as composed is incorrect hence, denied.

Grounds:

- a. **denied not admitted**. As this Honorable Tribunal has got nothing to do with the fitness for promotion case as per reported judgment **2013 SCMR 99** is very much clear in this regard.
- b. **denied not admitted**. As appellant was treated in accordance with Law, Rules & Policy.
- c. **denied not admitted**. As above
- d. **denied not admitted**. As above
- e. **denied not admitted**. As above
- f. No comment.
- g. That ground g, as composed is incorrect hence, denied and not admitted. As appellant neither annexed the copy of postal receipt alongwith his departmental appeal nor mentioned the date on his departmental appeal hence, the appeal in hand is not maintainable in its present form.
- h. That ground h, as composed is incorrect hence, denied and not admitted. As per reported judgment **2013 SCMR 99** this Honorable Tribunal has got no jurisdiction to entertain this service appeal.
- i. That ground i, of service appeal as composed is incorrect hence, denied. Comprehensive / detailed reply has already been given in Para No. 05 of the factual objections.
- j. The respondents seek leave to raise additional grounds at the time of arguments.

h

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k. That ground k, of service appeal as composed is incorrect hence, denied. As replied in para 5 of facts.

Under the circumstances, it is humbly prayed that the instant service appeal is not maintainable, hence liable to be dismissed with cost.

(Mr. Faiz Alam)
Additional Secretary (Establishment), E&SED
On behalf of
(Masood Ahmed)
Secretary E&SED
(Respondent No. 01)

(Mr. Abdus Samad)
Deputy Director (Legal), Directorate of E&SE
On behalf of
(Samina Altaf)
Director (E&SE) Khyber Pakhtunkhwa
Peshawar
(Respondent No. 02, 03)

(Muhammad Tanveer)
District Education Officer (Male)
Haripur
(Respondent No. 04)

Before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp
court Abbottabad.

Appeal No. 2296/2023

Sakhi Muhammad.....Appellant

VERSUS


Govt: of Khyber Pakhtunkhwa & Others.....Respondents

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS


AFFIDAVIT

I, Mr. Muhammad Tanveer, District Education Officer (M) Haripur, do hereby affirm and declare that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.


It is further, stated on oath that in this appeal the answering Respondents have been placed ex-parte nor has their defense been struck off.


(Mr. Faiz Alam)
Additional Secretary
(Establishment), E&SED
On behalf of
(Masood Ahmed)
Secretary E&SED

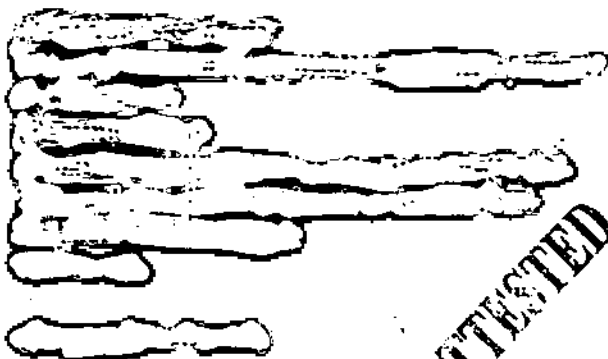
(Respondent No. 01)


(Mr. Abdus Samad)
Deputy Director (Legal)
Directorate of E&SE
on behalf of
(Samina Altaf)
Director (E&SE) Khyber Pakhtunkhwa

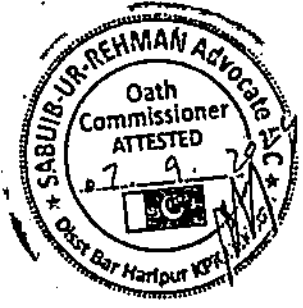
(Respondent No. 02/03)


Muhammad Tanveer
District Education Officer (M)
Haripur

(Respondent No. 04)



ATTESTED



Annexure - A -

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.



NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's 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 M.A 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

Annex "D/1"

Attested
District Education Officer (M)
Haripur

				recruitment; and (b) fifty percent by initial recruitment.
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, 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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(ii) 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 second class 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>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A 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>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>

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 at 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.3:

			<p>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3;</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst</p>
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			<p><i>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:</i></p> <p><i>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</i></p> <p><i>(ii) twenty Five percent by initial recruitment.</i></p> <p><i>Note:</i></p> <p><i>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.</i></p> <p><i>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.</i></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 BIZLAND)
SECTION OFFICER (PRIMARY)

Promotion of SST of District Haripur

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUN KHAWA PESHAWAR

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE HELD ON 19.10.2020 AT 10:30 AM IN OFFICE OF THE DIRECTOR (E&SE) KHYBER PAKHTUN KHAWA PESHAWAR.

A meeting of the Departmental Promotion Committee was held on 19.10.2020 at 10:30 AM under the Chairmanship of Director, Elementary and Secondary Education Khyber Pakhtunkhwa to discuss the promotion cases of SCT/CT, SDM/DM, SAT/AT, STT/TT S.Qari/Qari and PSHT/ SPST/ PST(Male) to the posts of SST(G) and SST (P/M) of the Elementary & Secondary Education Department respectively. The following attended the meeting:

1. Hafiz Dr.Muhammad Ibrahim
Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa
2. Dy: Secretary/SO (School)Male
Representative of
Elementary & Secondary Education,
Khyber Pakhtunkhwa
3. Fazle Wahid
Deputy Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa
4. District Education Officer (Male),
Haripur

In Chair

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

A. Promotion to SST (General)

ITEM No.1 PROMOTION OF SCT MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

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

Total No. of Vacant Post of SST(G)		25					
25% Annual Recruitment of SST (G)		7.25					
25% Promotion Quota of SST (G)		18.75					
25% SCT/CT Quota to SST(G)		10					
Posts Available for Promotion (G)		10					
Proposed SCT for Promotion to SST (G)		9					
Deferred of Promotion from SCT to SST (G)		1					
Sr.	Sr.N	Name of Official	Name of School	Date of Birth	Date of Appt: as Regular CT	Qual:	Remarks
1	122	Ehsan Ahmad	GHS No 1 Haripur	10/01/1962	29/05/1994	MA, BA from Al-Khair University B Ed	Not considered for Promotion to the post of SST(G) in BPS-16 as deferred for BA from Al-Khair University. HEC attestation required.
2	124	Hafiz Haroon Shah	GHS Chakwal	01/07/1967	19/11/1994	MA, B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect
3	127 (A)	Muhammad Haroon Shah	GHS Sarai	25/09/1971	10/02/1995	MA, M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect

Ahmed
District Education Officer (M)
Haripur

Promotion of SST of District Haripur

5	138	Mir Jameel-ur- Rehman	GHSS Sirikot	01/07/1967	18/09/1995	MA, M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
		Tahir Jamil	GHS Bhera	09/03/1970	18/09/1995	BA,B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
6	139	Abdul Waheed	GHSS Panian	10/04/1971	20/09/1995	MA, B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
7	140	Shamriz Khan	GHS TT Shlp	06/02/1965	01/10/1995	BA,B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
8	141	Muhammad Haroon	GHSS Sirikot	30/03/1969	25/10/1995	MA,MA (Edu)	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
9	142	Syed Pana Ali Shah	GHS Noor Pur	08/02/1972	02/12/1995	MA,M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
10	143	Sardar Zubair Elahi	GHS Saral Gadaal	02/03/1971	19/12/1995	MSc(P.S) MA Edu:	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

ITEM No.2 PROMOTION OF SDM (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

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

Total No. of Vacant Post of SST(G)	25
25% Initial Recruitment of SST (G)	7.25
75% Promotion Quota of SST (G)	18.75
4% SDM/DM Quota to SST(G)	1
Posts Available for Promotion (G)	1
Proposed SDM for Promotion to SST (G)	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular DM	Qual:	Remarks
01	22	Tariq Mehmood	GHS K.T.S. No.2	16/10/1967	21/02/2013	MA, M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

ITEM No.3 PROMOTION OF SAT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

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

Total No. of Vacant Post of SST(G)	25
25% Initial Recruitment of SST (G)	7.25
75% Promotion Quota of SST (G)	18.75
4% SAT/ATQuota to SST(G)	1
Posts Available for Promotion to SST (G)	1
Proposed SAT for Promotion to SST (G)	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular AT	Qual:	Remarks
1	18	Tahab Shah	GHSS Sirikot	16-10-1968	01-07-1997	MA,B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

PROMOTION OF STT (BPS-16) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Promotion of SST of District Haripur

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

Total No. of Vacant Post of SST(G)	25
25% Initial Recruitment of SST (G)	7.25
75% Promotion Quota of SST (G)	18.75
4% SAT/AT Quota to SST(G)	1
Posts Available for Promotion to SST (G)	1
Proposed SAT for Promotion to SST (G)	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular TT	Qual:	Remarks
1	10	Muhammad Ibrahim	GHS Aloli	16-03-1973	12-04-1999	MA, M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

ITEM No.5 PROMOTION OF S.QARI (BPS-15) MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

The case of promotion of S.Qari (BPS-15) to SST (G) BPS-16 was considered and the DPC recommended as under:

Total No. of Vacant Post of SST(G)	25
25% Initial Recruitment of SST (G)	7.25
75% Promotion Quota of SST (G)	18.75
3% S.Qari/Qari Quota to SST(G)	1
Posts Available for Promotion to SST (G)	1
Proposed SAT for Promotion to SST (G)	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular Qari	Qual:	Remarks
1	8	Siddique-ul-Hassan	GHS KT Shlp #4	01-01-1976	05-04-1999	MA, B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

ITEM No.6 PROMOTION OF PSHT/SPST/PST MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

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

Total No. of Vacant Post of SST(G)	25
25% Initial Recruitment of SST (G)	7.25
75% Promotion Quota of SST (G)	18.75
20% PSHT/SPST/PST Quota to SST(G)	5
Posts Available for Promotion to SST (G)	5
Proposed PSHT/SPST/PST for Promotion to SST (G)	5

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qual:	Remarks
1	269	Gulzar Muhammad	GPS Peer Colony	05/01/1966	22/10/1991	BA, B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
2	273	Tariq Mehmood	GPS Chechlan	02/07/1969	22/03/1992	BA, PTC, M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
3	274	Mehmood Elahi	GPS Bhutrl	20/12/1970	22/03/1992	BA, PTC, D.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
4	279	Garvez Akhter	GPS Ganahrl	15/04/1967	24/03/1992	MA, B.Ed, PTC	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
5	285	Shams-ur-Rehman	GPS klarl	5/04/1970	24/03/1992	BA/M.A Edu., PTC	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

Promotion of SST of District Haripur

B. PROMOTION TO SST (P/M)

ITEM No.1 PROMOTION OF SCT MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS
The case of promotion of SCT(BPS-16) to SST (P/M) BPS-16 was considered and the DPC recommended as under:

Total No. of Vacant Post of SST(P/M)		14					
25% Initial Recruitment of SST (P/M)		3					
75% Promotion Quota of SST (P/M)		11					
40% SCT/CT Quota to SST(P/M)		5.6					
Posts Available for Promotion to SST (P/M)		6					
Proposed CT/SCT for Promotion to SST (P/M)		6					
Sl#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1	159	Firdous Khan	GHS Rehana	01/01/1969	30/08/1996	B.Sc, B.Ed	Considered suitable for Promotion to the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
2	208	Zia Khalid	GHS Sarri	23/03/1989	05/11/2014	M.Sc, M.Ed	Considered suitable for Promotion to the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
3	209	Zamurad Khan	GHS Dobandi	31/03/1971	06/11/2014	B.Sc, B. Ed	Considered suitable for Promotion to the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
4	218	Zulfiqar Hussain	GHS Pindori	11.9.1983	16.3.2015	B.Sc M.Ed	Considered suitable for Promotion to the post of SST(P/M) in BPS-16 on regular basis with immediate effect.
5	220	Abdul Razaq	GMS New Mumaya	05/04/1987	16/03/2015	B.Sc, M. Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.
6	221	Sahib Zada Shabir Ahmad	GHSS S.N Khan	2.2.1988	17.3.2015	B.Sc, B.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

ITEM No.2 PROMOTION OF DM MALE TO THE POST OF SST (P/M) BPS-16 ON REGULAR BASIS
The case of promotion of DM to SST (P/M) BPS-16 was considered and the DPC recommended as under:

Total No. of Vacant Post of SST(P/M)		14					
25% Initial Recruitment of SST (P/M)		3					
75% Promotion Quota of SST (P/M)		11					
4% DM/SDM Quota to SST(P/M)		1					
Posts Available for Promotion to SST (P/M)		1					
Proposed DM/SDM for Promotion to SST (P/M)		1					
Sl#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular DM	Qual:	Remarks
1	149	Umer Malik	GMS BandiSecran	01-11-1989	06-11-2014	BSC, DM, M.Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

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

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

Total No. of Vacant Post of SST(P/M)		14					
25% Initial Recruitment of SST (P/M)		3					
75% Promotion Quota of SST (P/M)		11					
3% S.Qari/Qari Quota to SST(P/M)		0.42					
Posts Available for Promotion to SST (P/M)		The Quota is not applicable.					
Proposed S.Qari/Qari for Promotion to SST (P/M)		0					

Promotion of SST of District Haripur

	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular Qari	Qual:	Remarks	
1	15	Sakhl Muhammad	GHS Kangra Colony	21-03-1971	07-05-2007	B.Sc, B. Ed	Considered suitable for Promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect.

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

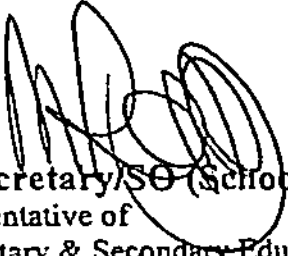


(
District Education Officer
(Male) Haripur



(Fazli Wahid)
Deputy Director

Elementary & Secondary Education
Khyber Pakhtunkhwa



Dy:Secretary/SO (School) Male
Representative of
Elementary & Secondary Education
Pakhtunkhwa



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



Amesurize — C — [] (18)

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

No. 2006 /F.No. Clarification of Minutes/2020/Haripur
Dated Peshawar the 07/08/2024.

To

The District Education Officer
(M) Haripur

Subject: PROVISION & CLARIFICATION OF SST PROMOTION MINUTES 2020 IN R/O MR. SAKHI MUHAMMAD SQARI/QARI TO SST (M/P)

Memo:

I am directed to refer to the subject cited above and to state that the DPC meeting was held on 19/10/2020 for the promotion of District cadre posts to SST (G), SST (B/C) & SST (M/P), wherein promotion to SST (M/P) from S.Qari/Qari under 3% share was not considered due to quota not applicable (0.42 which is less than 0.5). However, in the remarks column against the name of Mr. Sakhi Muhammad Qari, erroneously mentioned as "considered suitable for promotion to the post of SST(G) in BPS-16 on regular basis with immediate effect".

Hence, copy of the minutes (enclosed) with clarification that Mr. Sakhi Muhammad Qari was not promoted to SST (M/P) due to not applicable quota (0.42) being less than 0.5 as per the existing rules/Policy.

[Handwritten signature]
07/08/24

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

Endst: No. _____/

Copy forwarded to the:

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Master File.

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6/13
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07/08/24

[Handwritten signature]
Attested
Assistant Director (Estab-M-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

[Handwritten signature]
District Education Officer (M)
Haripur



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph.No.0995-920150,920151

Email: deomalehrp@gmail.com

19

AUTHORITY LETTER

Mr. Shakeel Ahmad ADEO Litigation DEO Office is hereby authorized to submit comments/reply in Honorable High Court Abbottabad Bench in Service Appeal No 2296/2023 titled Sakhi Muhammad VS Government of Khyber Pakhtunkhwa etc for onward submission to Honorable Tribunal on behalf of all official respondents.

Muhammad Tanveer

District Education Officer (M)

Haripur.