


Form- A

FORM OF ORDER SHEET

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

Implementation Petition No. 967 /2024

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1     | 29.08.2024                | <p>The implementation petition submitted today by Mr. Shah Faisal Nasapi Advocate. It is fixed for implementation report before Single Bench at Peshawar on 24.09.2024. Original file be requisitioned. AAG has noted the next date. Parcha Peshi given to counsel for the petitioner.</p> <p style="text-align: right;">By order of the Chairman<br/><br/>REGISTRAR</p> |

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER**  
**PAKHTUNKHWA, PESHAWAR**

Execution petition No. 967/2024

In

Service Appeal No.12220/2020

Fazal Hayat S/O Ihsan Ullah CT (BPS-15) GHS Kandi Zarin Khel  
Hassan Khel, Sub Division

.....Petitioner

Versus

Government of Khyber Pakhtunkhwa through Chief Secretary,  
Khyber Pakhtunkhwa, Peshawar & Others.....Respondents

**I N D E X**

| S.No | Description of Documents                                  | Annex | Pages |
|------|---|-------|-------|
|      | <b>Opening Sheet</b>                                      |       |       |
| 1.   | Implementation petition along with affidavit              |       | 1-4   |
| 2.   | Application for suspension along with Affidavit           |       | 5-6   |
| 3.   | <b>Copy of the consolidated judgment dated:03.11.2023</b> | A     | 7-13  |
| 4.   | <b>Copy of application</b>                                | B     | 14-16 |
| 5.   | Wakalat Nama  |       | 17    |

Applicant

Through

Dated: 23.08.2024

**Shah Faisal Nasapi**  
Advocate, High Court  
Peshawar

①

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER**  
**PAKHTUNKHWA, PESHAWAR**

Execution petition No. 967/2024

In

Service Appeal No.12220/2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15263

Dated 24/8/2024

Fazal Hayat S/O Ihsan Ullah CT (BPS-15) GHS Kandi Zarin Khel  
Hassan Khel, Sub Division

.....Petitioner

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary Finance Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Secretary Establishment Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. The Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
5. The Director Elementary & Secondary Education Department, Peshawar.

.....Respondents

**EXECUTION/IMPLEMENTATION PETITION**  
**FOR THE IMPLEMENTATION OF THE**  
**JUDGMENT DATED:03.11.2023 PASSED BY**  
**THIS HON'BLE TRIBUNAL IN LETTER AND**  
**SPIRIT.**

**Respectfully Sheweth:**

That the petitioner humbly submits as under;

1. That the petitioner filed Service Appeal bearing No.2375/2021 before this August Service Tribunal, against the impugned service rules notified on 24.07.2014 by the Government/Respondents.
2. That the appeal of the petitioner was finally heard by this Hon'ble Tribunal on dated:03.11.2023 and is decided as follows:-

**"8. So appellants having Higher Education in the subject of Computer Science were treated discriminatory as they were deprived from further prospects of promotion which every civil servants have during his service. Appellants are civil servants like all others specially in their own cadre and teaching line, ignoring appellants subject in 2014 service rule by mentioning all other subjects is the disparity and anomaly in service rules of the teaching cadre. Although appellants possessed professional qualification of B.Ed and M.Ed but due to not mentioning their subject of Computer Science in upper portion of qualification and eligibility deprive appellant from promotion, which is against the settled norms of justice and constitution of Islamic Republic of Pakistan beside Section 7 of**

3

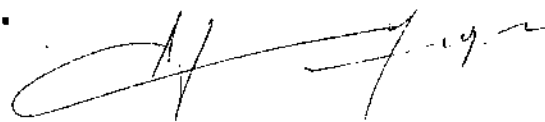
**(Appointment, Promotion and Transfer) Rules, 1989 and Section 9 of Civil Servant Act, 1973. So it is anomaly therefore, we sent the matter to the authority for considering appellant's subject of computer science and its inclusion in column No.03 of the Service Rules of 2014. Costs shall follow the event, Consign". (Copy of the consolidated judgment dated:03.11.2023 is attached as Annexure "A").**

3. That after obtaining copy of the judgment dated:03.11.2023 the same was submitted to the respondents for implementation of his grievance coupled with an application, but the respondents/department failed to do so, which is the violation of the judgment of this Hon'ble Tribunal. **(Copy of application is attached as Annexure "B").**
4. That the petitioner having no other remedy but to file this implementation petition under the Khyber Pakhtunkhwa Service Tribunal Act & rules 1974 and enabling provision of CPC read with other enabling provisions on the matter.
5. That this Hon'ble Tribunal under the above mentioned enactments has got the jurisdiction to order for the Execution & Direct respondents to implement the order of this Hon'ble Tribunal dated:03.11.2023.

(4)

It is, therefore, most humbly prayed that on acceptance of the instant Execution Petition, the Respondents may kindly be directed to implement the judgment dated:03.11.2023 passed by this Hon'ble Tribunal in Appeal No.2375/2021 in letter and spirit.

Any other relief deems proper and not specifically asked for may also be granted in circumstances of the case.



Applicant

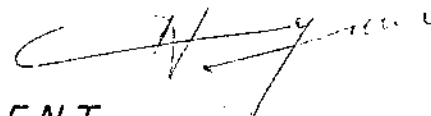
Through

**Shah Faisal Nasapi**  
Advocate, High Court  
Peshawar

Dated: 23.08.2024

**AFFIDAVIT**

I, Fazal Hayat S/O Ihsan Ullah CT (BPS-15) GHS Kandi Zarin Khel Hassan Khel, Sub Division (**Petitioner**), do hereby solemnly affirm and declare on oath that the contents of the accompanying **petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

5

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Execution petition No. \_\_\_\_\_/2024

In

Service Appeal No.12220/2020

Fazal Hayat S/O Ihsan Ullah CT (BPS-15) GHS Kandi Zarin Khel  
Hassan Khel, Sub Division

.....Petitioner

Versus

Government of Khyber Pakhtunkhwa through Chief Secretary,  
Khyber Pakhtunkhwa, Peshawar & Others.....Respondents

**APPLICATION FOR SUSPENSION OF  
IMPUGNED OFFICE ORDER BEARING  
NO.4874-4979 DATED:16.08.2024 TILL THE  
FINAL DECISION OF THE INSTANT  
EXECUTION PETITION.**

**Respectfully Sheweth:**

1. That the above mentioned Execution petition has been filed before this Hon'ble Tribunal which no date of hearing has not been fixed yet.
2. That the respondents on the basis of malafide issued an Office Order **NO.4874-4979 DATED: 16.08.2024** with subject "Revised Schedule of PRE-DPC Meeting for promotion to SST Post BPS-16" which

6

is in clear cut violation of the order of this Hon'ble Tribunal dated:03.11.2023.

3. That petitioner are hopeful for success of Execution petition.
4. That balance of convenience also lies in suspension of impugned office order by maintaining status quo.
5. That if the impugned office order is not suspended the petitioner will suffer irreparable loss.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned office order dated:16.08.2024 may kindly be suspended till the final disposal of the instant Execution petition.

Applicant

Through

**Shah Faisal Nasapi**  
Advocate, High Court  
Peshawar

Dated: 23.08.2024

**AFFIDAVIT**

*I, Fazal Hayat S/O Ihsan Ullah CT (BPS-15) GHS Kandi Zarin Khel Hassan Khel, Sub Division (**Petitioner**), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.*

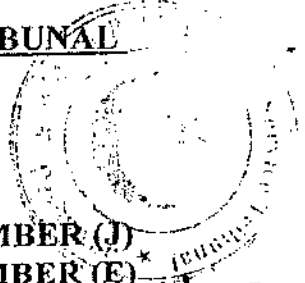
DEPONENT



(7)

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

Service Appeal No.2375/2021



BEFORE: **MRS. RASHIDA BANO** ... **MEMBER (J)**  
**MR. MUHAMMAD AKBAR KHAN** ... **MEMBER (E)**

*Handwritten initials and 'A' mark*

Mr. Ikram Ullah, PST (BPS-12) GPS Dawa Khan Kalay, District Malakand.  
... (Appellant)

**VERSUS**

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

Mr. Noor Muhammad Khattak  
Advocate ... For Appellant

Mr. Muhammad Jan  
District Attorney ... For Respondents

Date of Institution.....08.02.2023  
Date of Hearing.....03.11.2023  
Date of Decision.....03.11.2023

**JUDGMENT**

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

“On acceptance of this appeal, the impugned service rules Notified on 24.07.2014 may kindly be amended/modified to the extent of serial No.1B column No.3 of the table by

*Handwritten mark*

*Handwritten signature and stamp*

including/inserting the Computer Science subject of the appellant in column No.3 and the impugned service rules dated 24.04.2018 may kindly be amended/modified to the extent of Serial No. 2 in column No.5 of the table by allocating promotion quota for the appellant's cadre i.e PST and the respondents may further please be directed to consider the appellant for promotion to the posts of SST or SST-IT with all back benefits.

2. Through this single judgment we intend to dispose of instant service appeal as well as connected service appeals which are given as under.

1. Service Appeal No.12220/2020
2. Service Appeal No. 11498/2020
3. Service Appeal No. 2376/2021
4. Service Appeal No. 2377/2021
5. Service Appeal No. 2378/2021
6. Service Appeal No. 2379/2021
7. Service Appeal No. 2380/2021
8. Service Appeal No. 2381/2021
9. Service Appeal No. 2382/2021
10. Service Appeal No. 2383/2021
11. Service Appeal No. 2384/2021
12. Service Appeal No. 2385/2021
13. Service Appeal No. 2386/2021
14. Service Appeal No. 2387/2021
15. Service Appeal No. 2388/2021
16. Service Appeal No. 2389/2021
17. Service Appeal No. 2390/2021
18. Service Appeal No. 2391/2021
19. Service Appeal No. 2392/2021
20. Service Appeal No. 2393/2021
21. Service Appeal No. 2394/2021
22. Service Appeal No. 2395/2021
23. Service Appeal No. 2396/2021
24. Service Appeal No. 2397/2021
25. Service Appeal No. 2398/2021
26. Service Appeal No. 2399/2021
27. Service Appeal No. 2400/2021
28. Service Appeal No. 2401/2021

ATTESTED  
 EXAMINER  
 Selection Commission  
 Mysore

29. Service Appeal No. 1331/2022

As in all these appeals common question of law and facts are involved.

3. Brief facts of the case as given in the memorandum of appeal are that, the appellants were appointed as Primary School Teacher in Education Department vide order dated 02.06.2012 and was performing duties up to the entire satisfaction of their superiors. Respondents framed service rules of appellant cadre as well other teaching cadre vide notification dated 24.07.2014, wherein at Sr. No. 1B the of post SST (BPS-16) for which the qualification and eligibility has been mentioned in column No. 3. Respondent included all subjects except the subject of appellant i.e. Computer Science in the eligibility criteria. Respondents vide another notification dated 24.04.2018 notified Service Rules for the different cadre of Information Technology including the post of SST-IT mentioned at Sr. No. 2 in column No.5 of the table wherein eligibility for promotion to the post of SST-IT was fifty percent by initial recruitment and fifty percent by promotion on the basis of seniority-cum-fitness from amongst the CT-IT with five year service as such and having the qualification prescribed for the post of SST-IT. But in the said rules again the cadre/subject of the appellants have been ignored i.e PST-Computer Science. Feeling aggrieved from both the notifications, appellant alongwith others filed departmental appeal, which was not responded, hence the instant service appeal.

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

5. Learned counsel for the appellant argued that by not including the subject of computer science in the impugned service rules dated 24.07.2014

and not allocating the quota for appellant cadre i.e PST Computer Science in the impugned service rules dated 24.08.2018 is against the law, facts, norms of natural justice and material on the record, hence not tenable and liable to be modified/rectified to the extent of inclusion of subject of computer science in the eligibility criteria in the service rules. He further argued that the appellant has not been treated in accordance with law and rules and respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973. He contended that the said service rules are violative of Section 9 of the Civil Servant Act, 1973 read with Rule-7 of the (Appointment, Promotion and Transfer) Rules, 1989.

6. Conversely, learned District Attorney on behalf of respondents contended that appellants have been treated in accordance with law and rules. He further contended that framing service rules/structure for promotion to different teaching cadre employee of the department including the appellant against the SST (Science/General) posts under the specified reserved quota for promotion are prerogative of respondent department which they notified vide notification dated 24.07.2014. He further contended that service rules/structure are mainly based on natural justice and equality, wherein, each and every teaching cadre has a prospect of promotion to the higher post in the department on the basis of seniority-cum-fitness.

7. Perusal of record would reveals that appellants seeks modification in the service rules notified on 24.07.2014 to the extent of inserting the computer science subject of the appellant in Column No. 3 and service rules dated 24.04.2018 in column No. 5 by allocating promotion quota for the appellant's cadre i.e PST. The appellants were appointed as PST BPS-12 in education department vide order dated 10.05.2010, having qualification of B.Sc in

Computer Science and B.Ed and M.Ed. In accordance with service rules

framed and notified on 24.07.2014 qualification and eligibility for the post of SST BPS-16 has been mentioned in column No.3 of organogram, wherein subject of the appellant computer science was not mentioned and includes all other subjects which is as under:

1. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject

(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; and

(II) Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification for a recognized University.

So subject of the appellant was ignored in 2014 service rules. Appellant also ignored in service rules framed in the field of information technology by the respondents notified on 24.04.2018 wherein post of Secondary School Teacher Information Technology (BPS-16) was included at serial No.2 and in column No.5 of the table of eligibility for promotion to the post of SST-IT which is as follows:

(a) 50% by promotion on the basis of seniority cum fitness from amongst the CT-IT with 5 year service as such and having the qualification prescribed for the post of SST-IT.

(b) 50% by initial recruitment

8. So appellants having higher education in the subject of Computer Science were treated discriminatory as they were deprived from further prospects of promotion which every civil servant have during his service.

(12)

Appellants are civil servants like all others specially in their own cadre and teaching line, ignoring appellants subject in 2014 service rule by mentioning all other subjects is the disparity and anomaly in service rules of the teaching cadre. Although appellants possessed professional qualification of B.Ed and M.Ed but due to not mentioning their subject of Computer Science in upper portion of qualification and eligibility deprive appellants from promotion, which is against the settled norms of justice and Constitution of Islamic Republic of Pakistan beside Section 7 of (Appointment, Promotion and Transfer) Rules, 1989 and Section 9 of Civil Servants Act, 1973. So it is anomaly therefore, we sent the matter to the authority for considering appellant's subject of computer science and its inclusion in column No. 3 of the Service Rules of 2014. Costs shall follow the event. Consign.

9. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 10<sup>th</sup> day of November, 2023.

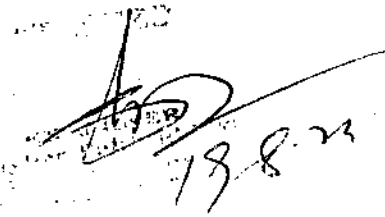


(MUHAMMAD AKBAR KHAN)  
Member (E)



(RASHIDA BANO)  
Member (J)

\*Kaleemullah




Date of Presentation 19-8-23  
 Number of Pages 6 pages  
 Copying Fee 30/-  
 Urgent 5/-  
 Total 35/-  
 Date of Issue 19-8-23  
 Date of Filing 19-8-23

ORDER  
10.11.2023

(13)

1. Learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney alongwith Behramand Khan, A.D and Faheem Khan, Assistant for the respondents present.
2. Vide our detailed judgement of today placed on file, we sent the matter to the authority for considering appellant's subject of computer science and its inclusion in column No. 3 of the Service Rules of 2014. Costs shall follow the event. Consign.
3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 10<sup>th</sup> day of November, 2023.*

  
(Muhammad Akbar Khan)  
Member (E)

  
(Rashida Bano)  
Member (J)

14

Annex

The Director Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Through Proper Channel

OF IMPLEMENTATION FOR APPOINTMENT OF  
JUDGMENT DATED 03/11/2023 OF SERVICE TRIBUNAL  
K.P. PESHAWAR

It is stated that the applicants appointed as Primary School Teacher (PST) in the Elementary & Secondary Education Department.

That the department concerned framed service rules of applicants' cadre as well as other in teaching cadre vide notification dated 24/07/2014 wherein at Serial No 1-B of the Post SST (APS-16) for which the qualification and eligibility has been mentioned in Column No 3. The department concerned included all the subjects, except the subject of Computer Science in the eligibility criteria. The department concerned vide another notification dated 24/04/2018 notified service rules for the different cadre of information technology including the post of SST (IT) mentioned at Serial No 2 in column No 3 of the table wherein eligibility for promotion to the post of SST (IT) was 50% by initial recruitment and 50% by promotion on the basis of seniority criteria from amongst CT, IT with 5 years service as such and having the qualification as prescribed for the post of SST (IT) but in the said rules again the cadre subject of the applicants have been ignored i.e. Computer Science.

3. That feeling aggrieved, the applicants filed department appeals, which were not responded, hence they filed Service Appeals, which were partially accepted and the matter send to the authority for considering applicants' subject of Computer Science and its inclusion on Column No 3 of the Service Rules of 2014. Copy of judgment is attached herewith for ready reference.

Representation, the judgment dated 03/11/2023 of Services Tribunal K.P. Peshawar in Service Appeals may please be implementation in letter and Dated-17.01.2024

1. Appeal No.12220/2020  
2. Appeal No.1498/2020  
3. Appeal No.11498/2020  
4. Appeal No.2377/2021  
Shahzad Ahmed (PST)

M. Bilal (PST)  
Appeal No.2376/2021  
Fozal Hameed (CT)  
Appeal No.12220/2020

Handwritten signatures and initials at the top left of the page.



14 A

To

The Director Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Through Proper Channel

Subject: **REPRESENTATION FOR IMPLEMENTATION OF  
JUDGMENT DATED 03/11/2023 OF SERVICE  
TRIBUNAL KP. PESHAWAR**

Respected sir

1. It is stated that the applicants appointed as Primary School Teacher BPS-12 in the Elementary & Secondary Education Department.
2. That the department concerned framed service rules of applicant's cadre as well other in teaching cadre vide notification dated 24/07/2014, wherein at Serial no 1-B of SST (BPS-16) for which the qualification and eligibility has been mentioned in Column No 03. The department concerned included all the subjects, except the subject of applicants i.e. Computer Science in the eligibility criteria, the department concerned another notification dated 24/04/2018 notified service rules for the different cadres of information technology included the post of SST (IT), mentioned at Serial No. 2 in column No.5 of the table, wherein eligibility for promotion to the post of SST (IT) was 50% by initial recruitment and 50% by promotion on the basis of seniority cum-fitness from among CT-IT with 5 years services as such and having the qualification as prescribe for the post of SST (IT), but in the said rules again the cadre/subject of the applicants have been ignored i.e. Computer science.
3. That feeling aggrieved, the applicants filed department appeals, which were not respondent hence they filed Service Appeals, which were partially accepted and the matter send to the authority for considering applicants subject of Computer Science and its inclusion on column No 3 of the Service Rules of 2014, **copy of judgment is attached herewith for ready reference.**

It is, therefore most humbly requested that on acceptance of this representation, the judgment dated 03/11/2023 of Service Tribunal KP, Peshawar in Service Appeals may please be implementation in letter and spirit

Dated: - 17/01/2024

1 Appeal No. 12220/2020

FAZAL HAYAT (CT)

3 Appeal No. 237/621

M.BILAL (PST)

2. Appeal No. 11948/2020

MUHAMMAD RAEES GUL (PST)

4 Appeal No. 2377/21

SHAHZAD AHMED (PST)

29 Appeal No. 1331/2022 (PST)

28 Appeal No. 2401/2021 (PST)

27 Appeal No. 2399/2021 (PST)

26 Appeal No. 2398/2021 (PST)

25 Appeal No. 2397/2021 (PST)

24 Appeal No. 2396/2021 (PST)

23 Appeal No. 2395/2021 (PST)

22 Appeal No. 2394/2021 (PST)

21 Appeal No. 2393/2021 (PST)

20 Appeal No. 2392/2021 (PST)

19 Appeal No. 2391/2021 (PST)

18 Appeal No. 2390/2021 (PST)

17 Appeal No. 2389/2021 (PST)

16 Appeal No. 2388/2021 (PST)

15 Appeal No. 2387/2021 (PST)

14 Appeal No. 2386/2021 (PST)

13 Appeal No. 2385/2021 (PST)

12 Appeal No. 2384/2021 (PST)

11 Appeal No. 2383/2021 (PST)

10 Appeal No. 2382/2021 (PST)

9 Appeal No. 2381/2021 (PST)

8 Appeal No. 2380/2021 (PST)

7 Appeal No. 2379/2021 (PST)

6 Appeal No. 2378/2021 (PST)

5 Appeal No. 2377/2021 (PST)

4 Appeal No. 2376/2021 (PST)

3 Appeal No. 2375/2021 (PST)

2 Appeal No. 2374/2021 (PST)

28. Appeal No. 2401/2021 (PST)

27. Appeal No. 2399/2021 (PST)

26. Appeal No. 2398/2021 (PST)

25. Appeal No. 2397/2021 (PST)

24. Appeal No. 2396/2021 (PST)

23. Appeal No. 2395/2021 (PST)

22. Appeal No. 2394/2021 (PST)

21. Appeal No. 2393/2021 (PST)

20. Appeal No. 2392/2021 (PST)

19. Appeal No. 2391/2021 (PST)

18. Appeal No. 2390/2021 (PST)

17. Appeal No. 2389/2021 (PST)

16. Appeal No. 2388/2021 (PST)

15. Appeal No. 2387/2021 (PST)

14. Appeal No. 2386/2021 (PST)

13. Appeal No. 2385/2021 (PST)

12. Appeal No. 2384/2021 (PST)

11. Appeal No. 2383/2021 (PST)

10. Appeal No. 2382/2021 (PST)

9. Appeal No. 2381/2021 (PST)

8. Appeal No. 2380/2021 (PST)

7. Appeal No. 2379/2021 (PST)

6. Appeal No. 2378/2021 (PST)

5. Appeal No. 2377/2021 (PST)

4. Appeal No. 2376/2021 (PST)

3. Appeal No. 2375/2021 (PST)

2. Appeal No. 2374/2021 (PST)

Handwritten signatures and notes on the left side of the page.

Handwritten signatures and notes on the right side of the page.

Handwritten number '15' inside a circle at the bottom of the page.

15 A

LEGIBLE COPY

5 Appeal No. 2378/21

SAJID KHAN (PST)

7 Appeal No. 2380/21

AFZAL SHAH (PST)

9 Appeal No. 2382/21

M. SOHAIL (PST)

11 Appeal No. 2384/21

MUBASHIR MEHMOOD (PST)

13 Appeal No. 2386/21

NAIMAT ULLAH KHAN (PST)

15 Appeal No. 2388/21

FIDA HUSSAIN (PST)

17 Appeal No. 23890/21

ABDUL LATIF (PHST)

19 Appeal No. 2392/21

FAZAL SHAH (PST)

21 Appeal No. 2394/21

SHAMS UR REHMAN (PST)

23 Appeal No. 2396/21

M. ASAD ULLAH (PST)

25 Appeal No. 2398/21

SAHIBZADA KALEEM ULLAH (CT)

27 Appeal No. 2400/21

ISHFAQ SAEED (PST)

29 APPEAL NO.1331/2022

SHAHID HUSSAIN (PST)

6 Appeal No. 2379/21

M.SIBTAIN (PST)

8 Appeal No. 2381/21

RIZWAN AMAD (PST)

10 Appeal No. 2383/21

ZEESHAN AHMED (PST)

12 Appeal No. 2385/21

MUSLIM SHAH (PST)

14 Appeal No. 2387/21

KAUSAR KHAN (PST)

16 Appeal No. 2389/21

SHAH HUSSAIN (PST)

18 Appeal No. 2391/21

FAZAL AHMAD (PST)

20 Appeal No. 2393/21

TANVEER AHMAD (PST)

22 Appeal No. 2395/21

JUNAID AHMAD JAMI (AT)

24 Appeal No. 2397/21

WAQAS (DM)

26 Appeal No. 2399/21

RASHID AHMAD KHAN (PST)

28 Appeal No. 2401/21

HAJI REHMAN (SPST)

7

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



ND/21-11/19 No. of Form No. 1914/2024 Filed on 11/11/2024

(16)

**Subject: APDC Education Director (Male) Khyber Pakhtunkhwa**  
**REVISSED SCHEDULE OF PRE-OPC MEETINGS FOR PROMOTION TO 531 POSTS (MS, 19)**

I am directed to refer to the office letter No. 1050-28 dated 05/08/2024 on the subject cited above to state that in the light of the directorate letter No. 4330-24/DLIT (M) dated 12/08/2024 (Annexure A), seniority lists in respect of these teachers regulated under the (Appointment & Regulation) Act, 2011. It is therefore requested to attend the (Pre-OPC) meetings as per the foregoing revised schedule with working papers, and generally list of all Candidates duly comply by (Pre-OPC) Government Form 1, 2, 3 and 4. Documents as per the given instructions please.

**Instruction for submission of documents**  
 All documents must be completed in all respects, attested, signed & signed by the Officer concerned (Tagged & Flipped) and in the following sequence with covering letter.  
 1. An Seniority List and Working papers (Each with must be signed by the DEOS concerned & Filed)  
 2. Personal file of Teacher  
 3. Pro-Data  
 4. Last Incremental  
 5. Service Certificate  
 6. Spreads  
 7. EPFS 3 years  
 8. 5 years results  
 9. An Appointment Order  
 10. All Promotion Order  
 11. All Transfer orders  
 12. CVC  
 13. SSC & DUC  
 14. HSSC & DUC  
 15. B.A.B.S.C Degree & DUC  
 16. BS Degree & DUC  
 17. B.Ed Degree & DUC  
 18. P.T.C. C. Level Certificate & DUC  
 19. 3 years & 5 years results

| S # | Date       | Day       | Name of District                  | 1 | 2 | 3 | 4 |
|-----|------------|-----------|-----------------------------------|---|---|---|---|
| 1   | 21/08/2024 | Tuesday   | 1 Khar                            | 3 | 1 |   |   |
| 2   | 28/08/2024 | Wednesday | 1 Kohistan Lower 2 Kohistan Upper | 2 | 1 |   |   |
| 3   | 29/08/2024 | Thursday  | 1 Chitral Upper 2 Chitral Lower   | 2 | 1 |   |   |
| 4   | 01/09/2024 | Friday    | 1 Manjeri                         | 2 | 1 |   |   |
| 5   | 02/09/2024 | Saturday  | 1 Mardan                          | 2 | 1 |   |   |
| 6   | 04/09/2024 | Sunday    | 1 Mardan 2 Kohistan Upper         | 2 | 1 |   |   |
| 7   | 05/09/2024 | Monday    | 1 Shangha 2 Buner                 | 2 | 1 |   |   |
| 8   | 09/09/2024 | Thursday  | 1 Shangha 2 Buner                 | 2 | 1 |   |   |
| 9   | 10/09/2024 | Friday    | 1 Bannu                           | 2 | 1 |   |   |
| 10  | 11/09/2024 | Saturday  | 1 Faisla                          | 2 | 1 |   |   |
| 11  | 12/09/2024 | Sunday    | 1 Faisla                          | 2 | 1 |   |   |
| 12  | 13/09/2024 | Monday    | 1 Mardan                          | 2 | 1 |   |   |
| 13  | 14/09/2024 | Tuesday   | 1 Mardan                          | 2 | 1 |   |   |
| 14  | 15/09/2024 | Wednesday | 1 Mardan                          | 2 | 1 |   |   |
| 15  | 16/09/2024 | Thursday  | 1 Mardan                          | 2 | 1 |   |   |
| 16  | 17/09/2024 | Friday    | 1 Mardan                          | 2 | 1 |   |   |
| 17  | 18/09/2024 | Saturday  | 1 Mardan                          | 2 | 1 |   |   |
| 18  | 19/09/2024 | Sunday    | 1 Mardan                          | 2 | 1 |   |   |
| 19  | 20/09/2024 | Monday    | 1 Mardan                          | 2 | 1 |   |   |
| 20  | 21/09/2024 | Tuesday   | 1 Mardan                          | 2 | 1 |   |   |
| 21  | 01/10/2024 | Wednesday | 1 Mardan                          | 2 | 1 |   |   |

Assistant Director (Establishment)  
 Directorate of Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar  
 16/08/2024

Copy forwarded to the  
 1 NS to Secretary ESSED Khyber Pakhtunkhwa Peshawar  
 2 PA to Director ESSED Khyber Pakhtunkhwa Peshawar  
 1 Khyber Pakhtunkhwa Peshawar

Assistant Director (Establishment)  
 Directorate of Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar

16 A

## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

No.4874-4979 no /01/Promotion to SSTs/2024/Estab-1 (M)  
Dated: Peshawar the 16/8/2024

To

As district Education Officers  
(Male) Khyber Pakhtunkhwa

**Subject: REVISED SCHEDULE O PRE-DPC MEETINGS FOR PROMOTION TO SST POSTS (BPS-16)**

Memo

I am directed to refer to the officer letter no. 1050-78 dated 05/08/2024 on the subject cited above and to state that in the light of this directorate letter No. 4230-J/AD (LIT: II) dated 13/08/2024 (Annex-A), update the seniority lists in respect of those teachers regularized under the (Appointment&Regularization) Act,2017

It is, therefore, requested to attend the Pre-DPC Meetings as per the following revised schedule along with working papers, final seniority list of all cadres duly signed by DEO Concerned (each Page) and personal files/documents as per he give instructions please

| S.# | Date       | Day       | Name of Districts                 | Instruction for submission of documents   |
|-----|------------|-----------|-----------------------------------|---|
| 1   | 27/08/2024 | Tuesday   | 1 Karak 2 Tank                    | <p>as documents must be completed in all respects. Attested, signed/ C. Signed by the officer concerned (tagged &amp; Flagged) and in the following sequence with covering letter,</p> <p><b>1. All seniority lists and Working papers (Each pages) must be signed by the DEO concerned. (2 Files)</b></p> <p><b>2. Personal file of teacher</b></p> <ul style="list-style-type: none"> <li>• Bio-data</li> <li>• Non involvement</li> <li>• Service certificate</li> <li>• Synopsis</li> <li>• PERs 5 years</li> <li>• 5 years results</li> <li>• All appointment orders</li> <li>• All Promotion orders</li> <li>• All transfer orders</li> <li>• SSC &amp; DMC</li> <li>• HSSC &amp; DMC</li> <li>• BA/BSC DEGREE &amp; DMC</li> <li>• BS DEGREE &amp; DMC</li> <li>• B.Ed degree &amp; DMC</li> <li>• PTC, CT, DM dtc certificate &amp; DMC</li> <li>• Original &amp; copy of service Book</li> </ul> |
| 2   | 28/08/2024 | Wednesday | 1 kohistan lower 2 kohistan upper |   |
| 3   | 29/08/2024 | Thursday  | 1 chitral lower 2 chitral upper   |   |
| 4   | 02/09/2024 | Monday    | 1 Hangu 2 Kohat                   |   |
| 5   | 03/09/2024 | Tuesday   | 1 Malakand 2 kolaiPalas           |   |
| 6   | 04/09/2024 | Wednesday | 1 Battagram 2 Buner               |   |
| 7   | 05/09/2024 | Thursday  | 1 Shangla 2 Torghar               |   |
| 8   | 09/09/2024 | Monday    | Charsadda                         |   |
| 9   | 10/09/2024 | Tuesday   | Bannu                             |   |
| 10  | 11/09/2024 | Wednesday | Haripur                           |   |
| 11  | 12/09/2024 | Thursday  | Mardan                            |   |
| 12  | 16/09/2024 | Monday    | Nowshera                          |   |
| 13  | 17/09/2024 | Tuesday   | Abbottabad                        |   |
| 14  | 18/09/2024 | Wednesday | Mansehra                          |   |
| 15  | 19/09/2024 | Thursday  | LakkiMarwat                       |   |
| 16  | 23/09/2024 | Monday    | D.I.Khan                          |   |
| 17  | 24/09/2024 | Tuesday   | Dir Upper                         |   |
| 18  | 25/09/2024 | Wednesday | Dir Lower                         |   |
| 19  | 26/09/2024 | Thursday  | Swat                              |   |
| 20  | 30/09/2024 | Monday    | Swabi                             |   |
| 21  | 01/10/2024 | Tuesday   | Peshawar                          |   |

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

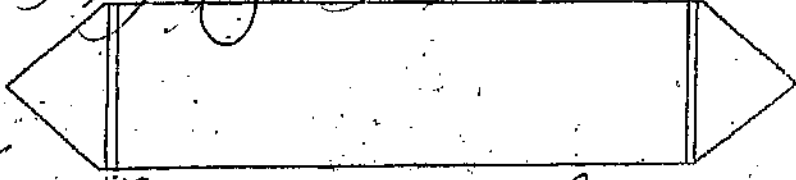
Endst No \_\_\_\_\_/

Copy forwarded to the

- 1 PS to Secretary E&SED Khyber Pakhtunkhwa Peshawar
- 2 PA to Director E&SED Khyber Pakhtunkhwa
- 3 Master File  
Assistant Director (Estab-M-1)

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

بعدالت شہرہ روزنامہ صبح بخیر گواہ



2 پنجاب سائنس

موزی مقدمہ دعوی جرم

باعث تحریر آنکے

مقدمہ درج ذیل ہے ان والا پیر باج طرف سے واسطے میں کی وجہ سے ایک ایک کارروائی کے متعلق  
آن مقام لیسٹور کیلئے ہے اور یہاں سائنس  
مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلے پر حلف دینے جواب دہی اور اقبال دعوے اور  
بمسورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعوی اور درخواست ہر قسم کی تصدیق  
زرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کیلئے قریباً بیچل کی برادگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا ہے۔ بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساخنہ  
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جات التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بیرون گے کہ پیروی  
مذکورہ کریں۔ لہذا اذکالت نامہ لکھ دیا کہ سند ہے۔

مجلس حالات کلر اسٹیشن

الرقوم 20 فان العیب کے لئے منظور ہے

Shah Farid Alasqali