


# FORM OF ORDER SHEET

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

Appeal No. 1867 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/10/2024 <i>3</i>	<p>The appeal of Mr. Amjid Hussain received today by registered post through Muhammad Liaqat Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 30.10.2024. Counsel for the appellant has been informed telephonically.</p> <p style="text-align: right;">By order of the Chairman  REGISTRAR</p>

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

Appeal No. 1867 of 2024

Amjid Hussain S/o Abdul Hanan, presently SPST GPS Dhakhan Syedan  
Tehsil and District Abbottabad.

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa and others

...RESPONDENTS

**SERVICE APPEAL**

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...APPELLANT

Through Counsel:

*Amjad*

Dated:- 25/09/2024

*M Liaqat*  
(MUHAMMAD LIAQAT)  
Advocate High Court Abbottabad  
(0332-8900935)

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

**Appeal No. 1867 of 2024**

Amjid Hussain S/o Abdul Hanan, presently SPST GPS Dhakhan Syedan  
Tehsil and District Abbottabad.

**...APPELLANT**

**V E R S U S**

- 1) Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department (E&SED), Khyber Pakhtunkhwa, Peshawar.
- 2) Director, Elementary & Secondary Education (E&SED), Khyber Pakhtunkhwa, Peshawar.
- 3) District Education Officer (M) Abbottabad.
- 4) Sub Divisional Education Officer (M) Circle Dhamtour Abbottabad.

**...RESPONDENTS**

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**APPEAL UNDER SECTION 4 OF (NWFP) NOW  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
ACT 1974 AGAINST THE ACT OF RESPONDENT  
NO.3 WHEREBY HE DID NOT PROMOTED THE  
APPELLANT AND DENIAL TO EXTEND THE  
BENEFIT OF JUDGMENT IN SERVICE APPEAL  
NO.2231/2019 AND 2009 SCMR 1 WHICH IS**

AGAINST THE LAW, POLICY, WITHOUT JURISDICTION, ARBITRARILY, VOID AB-INITIO AND HAVING NO LEGAL EFFECT UPON THE VESTED RIGHT OF THE APPELLANT.

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**PRAYER:**

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, AND RESPONDENT NO.3 MAY GRACIOUSLY BE DIRECTED TO PROMOTE THE APPELLANT FROM SPST BPS-14 TO SPHT BPS-15 WITH ALL BACK BENEFIT AS PER NOTIFICATION NO.SO (PE) SSRC / MEETING / 2012/TEACHING CADRE DATED 13.11.2012 AND IN THE LIGHT OF JUDGMENT IN SERVICE APPEAL NO. 2231/19 AND 2009 SCMR 1. ANY OTHER RELIEF WHICH THIS HON'BLE TRIBUNAL DEEMS PROPER IN THE CIRCUMSTANCES OF THE CASE BE GRANTED.

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***Respectfully Sheweth***

**Brief Facts of the case are as under:**

1. That the appellant was appointed as PTC/ PST on 09.04.2005 having prescribed qualification and presently working as SPST BPS-14 at GPS

Dhakhān Syedan Abbottabad. (Copy of appointment order and pay slip are annexed as Annexures "A" & "B" respectively)

2. That the appellant passed HSSC in the year of 2015 and PTC Course in the years of 2001. (Copy of HSSC Certificate & PTC Certificate is annexed as Annexure "C" & "D" respectively)
3. That after the passing the HSSC exam appellant submitted the file for promotion but due to policy of 2018 appellant was not promoted, subsequently other employee of education department file appeal in service tribunal which was allowed and appellant again submitted his file promotion in the light of judgment of this Tribunal, and the file of the appellant again returned by the respondent No.3.
4. That on 23.06.2024 appellant submitted the department representation alongwith judgment of this Honourable tribunal passed in appeal no. 2231/19 dated 17.03.2021 on 23.06.2024 to the respondent No.3 to the effect that the promoted as PSHT as per the policy dated 13.11.2012 as

well as in view of the judgment dated 17.03.2021. (Copy of policy dated 13.11.2012 and departmental representation and order dated 17.03.2021 is annexed are annexure "E" "F" & "G" respectively)

5. That the request / departmental representation of the appellant was not decided till now.

Now appellant seeks indulgence of this Honourable Tribunal for setting aside the impugned order dated 18-12-2019 inter-alia on the following amongst many others:-

**GROUND:-**

- a. That the impugned act of respondent No.3 is against the law, facts and circumstances.
- b. That the impugned act is illegal passed in highly capricious manner which is void ab-initio, and without legal authority.
- c. That the respondents had illegally not consider the appellant for promotion and deprived the appellant for his legal right.

- d. That the identical issue was decided by the Honourable Peshawar High Court Abbottabad Bench in Writ Petition No. 207-A/2018 dated 07.11.2018 wherein, Honourable Court held that "there is no mention in Notification dated 30-01-2018 that the same would have retrospective effect." **(Attested Copy of the judgment dated 07.11.2018 is annexed as Annexure "H")**
- e. That the impugned act of respondent No.3 is against the Policy as a meeting was held on 08-05-2018 at committee room of E&SE KP under the chairmanship of respondent No. 2 wherein, issue of promotion was discussed at Serial No. 10 and respondent No. 2 directed all the DEOS including respondent No. 3 "that the promotion cases of PSTs to SPSTs/PSHTs must be entertained according to the previous Policy of promotion while new Rules are to be applied for new induction/recruitment." **(Copy of minutes of the meeting dated 08-05-2018 is annexed herewith as Annexure "I")**
- f. That the Notification dated 30-01-2018 is not applicable in the case of appellant as at the time of appointment no such terms and

conditions was incorporated in the appointment order of the appellant. Hence, Notification dated 30-01-2018 has no legal value in the case of appellant as appellant is eligible for promotion in view of Notification No.SO(PE)SSRC/Meeting/2012/Teaching Cadre dated 13- 11-2012.

- g.** That the notification dated 30-01-2018 is silent whether the same would have retrospective or prospective effect. Hence, impugned order dated 18-12-2019 is liable to be set aside on this score alone.
- h.** That the valuable rights of the appellant are involved.
- i.** That the appellant seeks leave of this Honourable tribunal to raise additional grounds during the course of arguments with the permission of Honourable Tribunal.
- j.** That the instant service appeal is well within time.
- k.** That the other points shall be urged at the time of arguments.

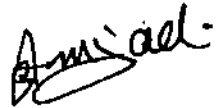


**PRAYER:**

It is therefore humbly prayed that on acceptance of instant Service Appeal, and respondent No.3 may graciously be directed to promote the appellant, from SPST Bps-14 to SPHT BPS-15 with all back benefit as per notification No.so (PE) SSRC / meeting / 2012/teaching cadre dated 13.11.2012 and in the light of judgment in service appeal no. 2231/19 and 2009 SCMR 1. any other relief which this Hon'ble tribunal deems proper in the circumstances of the case be granted.

...APPELLANT

Through Counsel:


Dated:- 25/09 12024
  
 (MUHAMMAD LIAQAT)  
 Advocate High Court Abbottabad
**VERIFICATION:-**

*Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal Court.*

Dated:- 25/09 12024

...APPELLANT



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

**Appeal No.                      of 2024**

Amjid Hussain S/o Abdul Hanan, presently SPST GPS Dhakhan Syedan  
Tehsil and District Abbottabad.

**...APPELLANT**

**V E R S U S**

Government of Khyber Pakhtunkhwa and others

**...RESPONDENTS**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Amjid Hussain S/o Abdul Hanan, presently SPST GPS Dhakhan  
Syedan Tehsil and District Abbottabad, *Appellant*, do hereby solemnly  
affirm and declare on Oath that the contents of instant *Service Appeal* are  
true and correct to the best of my knowledge and belief and that nothing  
has been concealed from this Hon'ble Tribunal Court.

*Amjad*

Dated:- 25/09/2024

**DEPONENT**

(9) Annexure "A"

OFFICE OF THE DISTRICT COORDINATION OFFICER DISTRICT ABBOTTABAD

ORDER

The District Government Abbottabad is pleased to appoint the following candidates as PTC (MALE) teacher in BPS-7 on Contract Basis @ Rs. 2220-120-5820 (in case of F.A/F.Sc-IInd Divn. in BPS-9 @ Rs. 2410-145-6760) plus usual allowances as admissible under the rules for a period of Two Years and posted in the schools as noted against each their names with effect from the date of taking over charge subject to the terms and conditions mentioned below:-

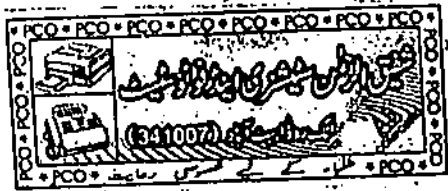
UNION COUNCIL WISE (ON CONTRACT BASIS)

U/C NAMLI MAIRA

1/81	51.41	S.Rashid S/O S.Ramzan R/O Bandi Maira	GPS Danna Tarada	Ag: vacant PTC post
2/89	50.20	Zakir S/O Ali Zaman R/O Bandi Maira	GPS Gali Bagla	-do-
3/337	49.88	Majid Sultan S/O Mohd Sultan R/O Namli Maira	GPS Golaga	-do-

U/C NAMMAL

1/529	51.96	Mohd Sabeer S/O Mohd Ayub R/O Nammal	GPS Tarhatti	Ag: vacant PTC post
2/525	35.82	Mohd Naheem Abbasi S/O Abdul Latif R/O Majuhan	GPS Jabri Kurli	-do-
3/763	35.81	Shamraz S/O Mohd Akbar R/O Majhoth	GPS Majhoth	-do-
4/796	34.02	Abdul Ghaffar S/O Mohd Khizar R/O Bandian	GPS Akhora	-do-
5/567	32.62	Waqar Ahmed S/O Afrisayab Khan R/O Vill: Majuhan	GPS Beri Bagla	-do-
6/610	31.27	Mohd Zariab S/O Mohd Zorab Khan R/O Vill: Bandian	GPS Langa Looth	-do-
7/411	27.83	Fanveer Ahmed S/O Mahroof Ahmed R/O Vill: Tarrach	GPS Thallah	-do-



پیشکش ڈسکاؤٹ

نزد ڈگری کالج بوائز ایبٹ آباد

U/C BAKOT

1/240	50.85	Mohd Mehtab S/O Mushtaq Ahmed R/o Badala	GMPS Lower Sangal	Ag. vacant PTC post
2/586	47.89	Ittikhar Ahmed S/O Mohd Yaacob K/o Khan Kalan	GMPS Kokalian	-do-
3/778	47.50	Aurangzeb S/O Mohd Miskeen R/o Dakhan	GPS Dakhan Moolia	-do-
4/812	45.96	Wajid Hussain Shah S/O Sajjad I R/o Sangal	GPS Leeran Sydan	-do-
5/585	45.85	Aurangzeb S/O Habibur Rehman R/o Seri Khan Kalan	GPS Danna Khan Kalan	-do-
6/241	45.36	Liaqat Ali S/O Mohd Zarib R/o Badala	GMPS Dherian Moolia	-do-
7/32	42.92	Mohd Shoaib S/O Gol Zaman R/o Danna Khan Kalan	GPS Danna Khan Kalan	-do-
8/779	36.98	Mohd Almas S/O Nasir Ahmed R/o Khan Kalan	GPS Aljabad	-do-
9/743	34.16	Javed Iqbal S/O Mu Abdullah R/o Nakkar Pakhu	GPS Marhatti	-do-
10/587	33.70	Saghir Ahmed S/O Mohd Yaqub R/o Bakote	GPS Dakhan Moolia	-do-

U/C BEEROTE

1/375	42.83	Abdul Karim S/O Mohd Farid R/o Lahoor	GPS Sanguri	Ag. vacant PTC post
2/609	33.25	M. Sparas S/O Mohd Rafique R/o Lower Birote	GPS Mawun-de-Hill	-do-
3/772	27.65	Melraj Mohd Khan S/O Abdul Ghaffoor R/o Birote	GPS Kolalian	-do-

U/C PALAK

1/504	33.71	M. Waseem Ahmed S/O Mohd. Saleem R/o Palak	GPS Bagla	Ag. vacant PTC post
2/667	32.65	Afraiz Ahmed S/O Karan Ellahi R/o Palak Khairanadi	GPS Andar Kot	-do-

U/C LORA

1/59	46.38	Anjad Ali Shah S/O Mehmood Shah R/o Ghjora	GPS Garhi	Ag. vacant PTC post
2/25	40.47	Mohd Ibrahim S/O Hamid Khan R/o Dheri Kiala, Lora	GPS Seri	-do-



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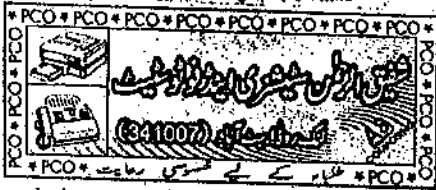
1/345	50.76	Saifur Rehman S/O R/o Summa Karagga		PTC post
2/23	44.47	Mohd Ismail S/O Mohd Asif R/o Nareela	GPS Nareela	-do-
3/346	43.67	Mohd Tanveer S/O Mohd Azam R/o Summa Karagga	GPS Karaga	-do-
4/21	42.96	Shafqat Hussain S/O Mohd Ramzan R/o Kutli	GPS Kehari	-do-
5/350	33.28	Irshad Abbasi S/O Mohd Mukhtar R/o Goreeni	GPS Chabgran	-do-
6/340	33.10	Mohd Jelmgir S/O Abdul Rasheed R/o Palassi	GPS Palassi	-do-
7/514	32.90	Mohd Fiaz Abbasi S/O Gul Dad Khan R/o Kalkot	GPS Kalkot	-do-
8/22	32.85	Mohd Afzal S/O Abdur Razaq R/o Kutli No.2	GPS Thakriala	-do-
9/24	32.83	Naveed Anjum S/O Mohd Mumtaz Ahmed r/o Kutli	GPS Bashkoli	-do-
10/397	30.11	Mohd Arif S/O Jelmgir Khan R/o Banwari	GPS Banwari	-do-
11/799	28.31	Ghulam Murtaza S/O Allah Ditta R/o Goreeni	GPS Karagga	-do-

**U/C NAGRI TUTIAL**

1/56	42.16	Usmat Rehman S/O Mohd Ramzan R/o Vill: Batangi	GPS Bhattian	Ag: vacant PTC post
2/359	41.86	Mohd Shehzad S/O Mohd Akhtar R/o Panjoth	GPS Panjoth	-do-
3/60	36.35	Gul Zeb Shah S/O Mehfooz Shah R/o Ghora, Lora (Adj: U/Council Lora)	GPS Batkanala	-do-
4/5	32.93	Abdul Hafeez S/O Lal Akbar R/o Lora (Adj: U/Council Lora)	GPS Baswair	-do-
5/204	47.92	Javed Akhtar S/O Fazal Haq R/o Nara (from Adj: U/Council)	GPS Degan	-do-
6/566	47.76	Jalilur Rehman S/O Mohd Zaman R/o Nara R/o Nara	GPS Hillan Sagana	-do-

**U/C PHALLAH**

1/482	53.45	Mohd Aftab S/O Mohd Bashir R/o Dheri Rakhala	GPS Narianghar	Ag: vacant PTC post
2/480	51.07	Atiq-ur-Rehman S/O Mohd Ilyas R/O Dheri Rakhala	GPS Narian ghar	-do-
3/73	48.75	Mohd Ahsan S/O Mehfoozur Rehman r/o Phallah	GPS Kund Battal	-do-
4/379	47.04	Shakeel Ahmed s/O Mohd Nazir R/o Rahi	GPS Sadih	-do-
5/50	46.43	Mohd Farooq S/O Manzoor Khan R/o Rahi	GPS Gali Gambeer	-do-
6/137	46.19	Abdul Waleed S/O Mohd Gulzar R/o Bajora	GPS Dheri Rakhala	-do-



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7/483	45.40	Mohd Fiaz S/O Mohd Riaz R/o Ghanbeer	GPS Dheri Rakhala	-do-
8/107	42.77	Fida Hussain Shah S/O R/o Langian	GPS Derian	-do-

## U/C BAGH

1/431	51.70	Mohd Arshraf S/O Mohd Sadiq R/o Dheri Kehal	GPS Khakwala	Ag. vacant PTC post
2/801	44.59	Mohd. Parvez S/O Mohd. Afsar R/o Bagh	GPS Bagh	-do-
3/246	38.82	Mohd Yousaf S/O Mohd Ayub Khan R/o Bagh	GPS Serian	-do-
4/498	33.54	Mustajab Hussain Shah S/O S. Afsar Shah r/o Dheri Kehal	GPS Jaggian	-do-
5/15	52.90	Riaz S/O Mir Afzal R/o G/Phulgran (from Adj. U/C Council)	GPS Kohalian	-do-

## U/C SRBHANA PHALKOT

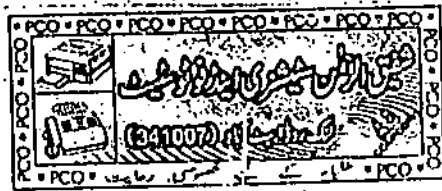
1/225	51.57	Sarwar Shah S/O S. Hassin Shah R/o Sarwah	GPS Gall	Ag. vacant PTC post
2/109	51.48	Siraj-ur-Rehman S/O Habibur Rehman R/o Malsa	G MPS Nakkar	-do-
3/177	46.42	Shahid S/O Mohd Sabi R/o Mohar Khurd	GPS Gulgran No.2	-do-

## U/C NARA

1/405	51.68	Jamil Akhtar S/O Ghulam Jilani R/o Satora	GPS Kangar Hoter	Ag. vacant PTC post
2/618	48.65	Afeesur Rehman S/O Baga Khan R/o Nara	GPS Chattan Ahmed Khan	-do-
3/505	48.10	Jabran Bashir S/O Mohd Bashir R/o Nara	GPS Katha	-do-

## U/C NATHIA GALLI

1/130	48.62	Qaiser Khan S/O Mohd Sadiq R/o Jhangra	GPS Lissan	-do-
2/602	47.07	Mohd Younis S/O Mohd Sultan R/o Vill Doong	GPS Lissan	-do-
3/601	45.19	Asifur Rehman S/O Fazalur Rehman R/o Doong	GPS Toheedabad	-do-
4/499	41.51	Amraiz Khan S/O Ali Zaman R/o Bagan	GPS Maira Pasala	-do-



پبل ڈسکاؤٹ

نزد ڈگری کارن بوائز ایبٹ آباد

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U/C SEER

1/597	48.83	Zameer Hussain S/O Mohd Khan R/o Vill. Noshera	GPS Gadher	Ag: vacant PTC post
2/727	42.42	Manzoor Ahmed S/O Mohd Rafique R/o Ziarat Masoom	GPS Jalsi Tajwal	-do-
3/822	42.11	Mohd Safdar S/O Mohd Soberan R/o Baswari	GMPS Maira Hasnalt	-do-
4/573	39.75	S. Sahibzida Gillani S/O Maqbool Hussain Shah no Sec	GMPS Moh. Gillani	-do-
5/741	39.25	Tariq Mehmood S/O Sher Zaman R/o Vill: Othela	GPS Ziarat Masoom	-do-
6/550	37.57	Mumtaz Alam S/O Abdul Jabbar R/o Kaghian	GPS Kaghian	-do-
7/549	36.38	Inayat ur Rehman S/O Lal Akbar Khan R/o Vill: Tupla	GPS Tupla	-do-
8/569	35.90	Jumshed Ali S/O Ali Asghar R/o Vill: Champar (Tajwal)	GPS Chanjar	-do-
9/327	34.57	Mohd Khalid S/O Karam Udd R/o Vill: Batnara	GMPS Simbir	-do-
10/663	34.35	Habibur Rehman S/O Lal Akbar R/o Vill: Tajwal	GPS Jhangra Tajwal	-do-
11/421	41.57	Allah Udd S/O Mohd Aslam R/O Nathia Gali (from Adj: U/C Council)	GPS Seer	-do-
12/542	30.80	Khalid Mehmood S/O Mohd Ajab R/o M/Gali (from Adj: U/C Council)	GPS Nallah	-do-
13/814	31.04	Mohd Ibrahim S/O Mohd Farooq R/o Moh: Doong (from A U/C Council)	GPS Gaider	-do-

U/C KHATHALA

1/304	49.77	Mohd Arif S/O Mohd Ibrahim R/o Vill: Salvote	GPS Makdabbi	Ag: vacant RTC post
2/650	49.38	Mohd Iqbal S/O Qalandar Khan R/o Vill: Khatlala	GPS Nakhay Sydan	-do-

U/C DALOLA

1/219	53.28	Mohd Rashid S/O Mir Abdullah R/o Darra	GPS Patta Doga	Ag: vacant PTC post
2/218	51.63	Inam-ul-Haq S/O Hamid-ul-Haq R/o Dalola	-do-	-do-
3/632	51.13	Mohd Akmal S/O Mohd Azad R/o Dabban Dalola	GMPS Hill Sirla	-do-

U/C PIND KARGO KHAN

1/494	49.74	Ashfaq Ahmed S/O Mohd Rasbi R/o P.K.Khan	GPS Pohar	Ag: vacant PTC post
2/145	47.61	Mohd Sugeel S/O Bashir Mohd R/o P.K.Khan	GPS Kothera	-do-



*Handwritten signature and initials*



**U/C BEERAN GALI**

1/129	49.83	Zulfiqar Ahmed S/O Mohd Ishaq R/O Vill: Jhaffar	GPS Jogimar	Ag: vacant PTC post
2/144	46.61	Ajmal Khan S/O Ghulam Hassan R/O Vill: Jhaffar	GPS Tabrat	-do-
3/90	44.54	Ahmed Nawaz S/O Mohd Gulzar R/O Moh: Khaiteer, Beerangali	GPS L/Beerangali	-do-
4/239	37.04	Mohd Irshad S/O Mohd Yousaf R/O Vill: Jhaffar	GPS Akhreela	-do-
5/806	30.85	Anjud Hussain S/O Abdul Hanan R/O Vill: Beerangali	GPS Bagla	-do-

**U/C BANDI ATTAI KHAN**

1/173	49.21	Mohd Anam S/O Wazir Ahmed R/O Bandi Attai Khan	GPS Darra	Ag: vacant PTC post
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**U/C NAGRI BALA**

1/553	50.12	Shaukat Hayat S/O Mohd Yaqub R/O Vill: Nagri Bala	GPS S/Akhrota	Ag: vacant PTC post
2/417	49.49	Mohd Saeed S/O Mohd Akram R/O Vill: Nagri Bala	GPS S/Akhrota	-do-
3/418	49.45	Mohd Asghar S/O Mohd Hassan R/O Vill: Nagri Bala	GPS Tupla Scer Ag: Open Merit Seat	-do-

**U/C CHAMHAD**

1/312	48.16	Khalid Mehmood S/O Fustam Khan R/O Chamhad	GPS Buch Gali	Ag: vacant PTC post
2/661	47.85	Chanzeb Khan S/O Aurangzeb R/O Chamhad	GPS Chamhad	-do-

**TERMS AND CONDITIONS**

1. They will sign the Agreement Form before joining service.
2. The candidates will enter into an Agreement with the Govt./Department and will be governed by the terms and conditions hereinafter mentioned in such agreement.
3. Their salary is subject to execution of Agreement deed based on the terms and conditions of the contract through EDO (S/L) Abbottabad as per Govt. rules and regulation.
4. They will get initial of the scale including usual allowances as admissible under the rules. They are entitled to annual increment as per rules.
5. The Dy: Distt: Officer (M/P) A. Abad should obtain Security Bond as well as Agreement Bond executed by each candidate to obey contract policy and will have not right to challenge they policy in any Court of Law.
6. The services will be considered as per rules and regulation laid by the Govt. of N-W.F.P.
7. Their services are liable to be terminated on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances, if any shall be forfeited in favour of Govt.
8. Contribution of G.P. Fund will be as per rules and regulation of Govt. of N-W.F.P.

341007

**SHAFIQ-UR-REHMAN**  
Stationery, Photostat & PCO  
Link Road, Near No. 1 Govt College



- 9. The appointees should join their post with immediate effect.
- 10. The services can be terminated at any time if their performance is found unsatisfactory and they will be proceeded against under the removal from service (Special Power) Ordinance 2000 and E&D Rules 1973.
- 23. They shall be required to furnish copies of all their certificates/degrees along with the original receipts and photo copy thereof pertaining to the verification fee of concerned examining body (Board/University) to the Dy. District Officer (M/P) Abad. The latter shall arrange verification of all the certificate degrees of the appointee and will issue a clearance certificate to each appointee for the release of his pay. His pay bill should not be submitted to the DAO before verification of all certificate/degrees from the concerned institutions of each candidate, herein all relevant documents must be submitted to the EDO (S&L) Abad upto 21/4/2005.
- 24. The ADO (M) concerned Circle should check their original certificate/degrees and Domicile.
- 25. The overage candidates should not be handed over charge, the age limit is 18 to 33 years.
- 26. No TADA etc will be allowed.
- 27. Charge reports should be submitted to all concerned.
- 28. Any aggrieved candidate has the right of appeal within 10 days of the issue of this notification and in case of acceptance junior most appointee appointment will be replaced/removed from service and he will have not right to appeal before any Honourable Court of Law.
- 29. Appointment against disable/deceased quota subject to the provision of the concerned certificate by the competent authority/standing medical board.
- 30. Who fail to joined charge upto 21/4/2005 his services/appointment will be automatically stand cancelled.

*J. J. J.*  
DISTRICT COORDINATION OFFICER  
ABBOTTABAD

Endst: No: 7948-9050 /App/VPTC (M) 2005/EDO(S&L) Dated A/Abad the 9/4/2005

- 1. Copy forwarded to the -
- 2. Director Schools & Literacy N.W.F.P. Peshawar
- 3. District Nazim, Abbottabad.
- 4. District Coordination Officer Abbottabad.
- 5. District Accounts Officer Abbottabad.
- 6. District Officer (S/L) Abbottabad
- 7. Dy. District Officer (M/P) Abbottabad
- 8. A.D.O. Circle concerned.
- 9. Headteacher concerned.
- 10. Budget & Accounts Officer concerned.
- 11. Acctt. Branch DDO(M/P) Abbottabad.
- 12. Candidates concerned.
- 13. Office Order file.

*[Signature]*  
EXECUTIVE DISTRICT OFFICER  
(SCH/LIT) ABBOTTABAD

341007

**SHAFIQ-UR-REHMAN**

Stationery, Photostat & PCO  
Link Road, Near No. 1 Govt College  
ABBOTTABAD

Prop: M. Shafiq

Annexure "B"

(13)

# Salary slip ( 00207280 December ...



**Dist. Govt. KP-Provincial**  
 District Accounts Office Abbottabad  
 Monthly Salary Statement (December-2023)

Personal Information of **MR AMIAD HUSSAIN d/o/a of ABDUL HANAN**

Personnel Number: 00207280 CNIC: 1310108335729

Date of Birth: 14/03/1979

Entry into Govt. Service: 15/04/2005

NTN:

Length of Service: 18 Years 08 Months 018 Days

Employment Category: Vocational/Temporary

Designation: PRIMARY SCHOOL TEACHER

DDO Code: AD6127-DY DIST OFFICER (SI) PRY ATD

Payroll Section: 003

GPF Section: 001

Cash Center: 04

GPF A/C No: 207280

GPF Interest applied

GPF Balance:

563,689.00 (Government)

Vendor Number: -

Pay date: BPS For - 2022

Pay Scale Type: Civil BPS 14

Pay Stage: 12

Wage type	Amount	Wage type	Amount
(001) Basic Pay	43,410.00	1001 House Rent Allowance 45%	3,321.00
1210 Convey Allowance 3005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	475.00	2199 Adhoc Relief Allow @ 10%	324.00
2316 Teaching Allowance 2021	3,036.00	2341 Dispt. Red All 15% 2022KP	4,032.00
2347 Adhoc Rel AI 15% 23(P517)	4,032.00	2378 Adhoc Relief All 2023 35%	14,585.00

### Deductions - General

Wage type	Amount	Wage type	Amount
3014 GPF Subscription	-3,900.00	3501 Government Fund	-1,300.00
3609 Income Tax	-513.00	3990 Emp. Edu. Fund KPK	-135.00
4004 R. Benefit & Death Comp.	-600.00		0.00

### Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	268,000.00	-5,500.00	0.00

### Deductions - Income Tax

Payable: 8,053.61 Recovered till DEC-2023: 2,941.00 Exempted: 2013.01 Recoverable: 3,099.60

Gross Pay (Rs.): 77,571.00 Deductions: (Rs.): -11,852.00 Net Pay: (Rs.): 65,719.00

Payee Name: AMIAD HUSSAIN

Account Number: 2625-5

Bank Details: NATIONAL BANK OF PAKISTAN, 231876 KHOLA KHOLA NEHAL, ABBOTABAD

Leaves: Opening Balance: Available: Earned: Balance:

Permanent Address: VILL & P O JHAFAR DIST ABBOTABAD

City: ABBOTABAD

Domicle: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: amjad207280@gmail.com



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Annexure "C"

369117151

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION  
ABBOTTABAD  
Khyber Pakhtunkhwa (Pakistan)**

**PROVISIONAL & DETAILED MARKS CERTIFICATE**

Roll No: 69117

Group: HUMANITIES

Part - II

Session: 2015 (Supply)

Name: AMJID HUSSAIN  
Father Name: ABDUL HANAN  
Reg No: 6286AB/AD-inIMP13  
Institution/  
District: ABBOTTABAD



has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of Oct/Nov as a Private Candidate.

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	33	--	43	--	76	Seventy-Six
Urdu (Comp)	200	49	--	51	--	100	One Hundred Only
Islamiyat Compulsory	50	27	--	--	--	27	Twenty-Seven
Pakistan Studies	50	--	--	30	--	30	Thirty Only
Islamic History	200	45	--	33	--	78	Seventy-Eight
Civics	200	58	--	40	--	98	Ninety-Eight
Islamiyat Elective	200	74	--	54	--	128	One Hundred Twenty-Eight
Total : 1100						537-D	Five Hundred Thirty-Seven Only
Remarks :							

Date : 22 DEC 2015

Checked By : MSK

[Signature]  
Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: [www.biseatd.edu.pk](http://www.biseatd.edu.pk)

(15)

Annexure "D"

Serial No. 169791

# Allama Iqbal Open University Islamabad



Certified that Mr/Ms AMJID HUSSAIN

Son/Daughter of ABDUL HANAN

Registration No. 00 NAD 0455 Roll No. J 6152431 having

completed the prescribed requirements in SPRING 2001 Semester, is awarded

## Primary Teaching Certificate

Detail of courses is as under:

Course Code	Title of the Course	% Marks Obtained	Grade
613	Principles of Education	44	
614	Educational Psychology	48	
615	School Organization and Management	44	
616	School Community and Practical Arts	46	
617	Teaching of Urdu	49	
618	Teaching of Mathematics	50	
619	Teaching of Science and Physical Education	56	
620	Teaching of Islamiat and Social Studies	46	
611	Workshop and Teaching Practice	77	

Obtained/Total Marks: 460 / 900

He/she has secured 51 % marks and has been placed in grade C

Result declared on: January 19, 2002

Date of issue: October 30, 2005

Prepared by: [Signature]

Checked by: [Signature]

[Signature]  
Controller of Examinations

Note: This certificate is issued without alterations/crasure.

Serial No.  
066817

16

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Roll No.  
J6152431

## DETAILED MARKS SHEET

Registration No.  
00-NAD-0455

This is to certify that Mr./Ms. AMJID HUSSAIN  
son/daughter of ABDUL HANAN has completed  
all the requirements for **Primary Teaching Certificate** with the  
following courses in SPRING, 2001 Semester :-

<u>Code</u>	<u>Course</u>	<u>Marks obtained</u>
613	Principles of Education	<u>44</u> /100
614	Educational Psychology	<u>48</u> /100
615	School Organisation	<u>44</u> /100
616	School Community & Practical Arts	<u>46</u> /100
617	Teaching of Urdu	<u>49</u> /100
618	Teaching of Mathematics	<u>50</u> /100
619	Teaching of Science and Physical Education	<u>56</u> /100
620	Teaching of Islamiat and Social Studies	<u>46</u> /100
611	Workshop and Teaching Practice	<u>77</u> /100

He/She has obtained 51 % marks and has been placed in grade C

Date: 19-01-2002

*Faqir*  
Controller of Examinations

Note: The Detailed Marks Sheet is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not in itself confer any right or privilege independently to the grant of a proper certificate which will be issued under the Regulations, in due course.



Peshawar, dated the November 13, 2012.

(17) Annexure "E"

No.SO(PE)4-5/SSRC/Meeting/2012/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 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the said Appendix and the schedule therewith.

SECRETARY TO GOVERNMENT OF THE KHYBER  
PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.

1 | Page of 12

Service Rules & Appointment / Promotion Rev: 2012-13

Attested  
[Signature]

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APPENDIX

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A

Nomenclature of the post.	Minimum qualification and experience for initial appointment or by transfer.	Age limit.	Method of recruitment.
Secondary School Teacher (BPS-16)	(i) - Second class Bachelor's Degree with two subjects as Chemistry, Botany, Zoology, Physics, Mathematics, Statistics Humanities and other equivalent groups from a recognized University; or  (ii) MA in Education or Bachelor's Degree in Education, from a recognized University.	18 to 35 years.	(a) Fifty percent by promotion on the basis of seniority-cum-fitness, in the following manner:  (i) forty per cent from amongst the Certified Teachers (General), Certified Teachers (Agriculture), Certified Teachers (Industrial Arts) and Certified Teachers (Home Economics) with at least five years service as such and having qualification mentioned in column No. 3;  (ii) four per cent from amongst the Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;  (iii) four per cent from amongst the Physical Education Teachers with at least five years service as such and having qualification mentioned in column No. 3.

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				<p>(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and</p> <p>(v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in Column No.3; and</p> <p>(b) fifty per cent by initial recruitment.</p>
2.	Senior Arabic Teacher (SAT) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4.	Senior Certified Teacher (SCT)(General) (BPS-16).		<p>A. K. S.</p>	By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).



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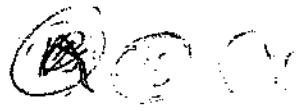
	Senior Certified Teacher (Industrial Arts) (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Industrial Arts), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Industrial Arts).
6.	Senior Certified Teacher (Agriculture) (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Agriculture), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Agriculture).
7.	Senior Drawing Master (BPS-16).			By promotion on the basis of seniority-cum-fitness from amongst Drawing Masters, with at least five years service as such and having qualification as prescribed for initial recruitment of Drawing Master.
8.	Senior Certified Teacher (SCT) (Home Economics) (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (Home Economics), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (Home Economics).
9.	Senior Physical Education Teacher (BPS-16).			By promotion, on the basis of seniority-cum-fitness, from amongst Physical Education Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Physical Education Teacher.

A. K. S. 11/1/1

21

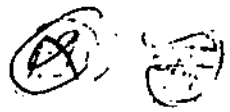
10.	Arabic Teacher (AT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris: or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Arabic from a recognized University.	20 to 35 years.	By initial recruitment
11.	Theology Teacher (TT) (BPS-15).	(i) Second Class Secondary School Certificate, from a recognized Board with Shahdatul Alamia from a recognized Tanzimatul Wafaqul Madaris or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by the Government from time to time; or (ii) Second Class Master's Degree in Islamiyat from a recognized University.	20 to 35 years.	(a) Seventy-five per cent by initial recruitment; and (b) twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Qaris, with at least five years service and having qualification prescribed for initial recruitment of Theology Teacher. <u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.
12.	Senior Qari (BPS -15).			By promotion, on the basis of seniority-cum-fitness, from amongst Qaris, with at least five years service as such and having qualification prescribed for initial recruitment.
13.	Certified Teacher (General) (BPS-15).	Bachelor's Degree or equivalent qualification from a recognized University with Certified Teacher	18 to 35 years.	(a) Forty per cent by initial recruitment; and

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		<p>Certificate or two years Associate Degree in Education from a recognized University or eighteen months Diploma in Education.</p>		<p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for transfer, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (General).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
14.	<p>Certified Teacher (Industrial Arts) (BPS-15).</p>	<p>(i) Bachelor's Degree from a recognized University with two years training in the relevant technical subjects from any Government Industrial or Govt. Technical Vocational Institute or Center; or</p> <p>(b) Bachelor's Degree from a recognized</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher</p>

*Attached*



	<p>University with nine months training from any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Industrial Arts).</p>		<p>(Industrial Arts):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Industrial Arts).</p> <p><u>Note:</u> In case of non availability of suitable person for promotion, then by initial recruitment.</p>
<p>15. Certified Teacher (Agriculture) (BPS-15).</p>	<p>(i) Bachelor's Degree from a recognized University with one year training in Agriculture from any Government institute or center with nine months training from Government Agro Technical Teacher Training Center of the level of Certified Teacher Agro Technical (Agriculture); or</p> <p>(ii) Bachelor's Degree with Agriculture as one of the subject, from a recognized University: or</p> <p>(iii) Bachelor's Degree from a recognized University with nine months training from</p>	<p>18 to 35 years.</p>	<p>(a) Forty per cent by Initial recruitment; and</p> <p>(b) sixty per cent by promotion, on the basis of seniority-cum-fitness from amongst the Primary School Head Teachers, with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture):</p> <p>Provided that if no suitable candidate is available amongst the Primary School Head Teachers for</p>

*Attended*

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any Government Agro Technical Teacher Training Center of the Level of Certified Teacher, Agro technical (Agriculture).

promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Certified Teacher (Agriculture).

Note: In case of non availability of suitable person for promotion, then by initial recruitment.

16.

Certified Teacher (Home Economics) (BPS-15).

- (i) Bachelor's Degree with Home Economics, as one of the subject, from a recognized University with in service training from Government Agro Technical Teacher Training Center, or
- (ii) Certified Teacher Certificate with Home Economics, as one of the subjects, from any Government Training school or college with Bachelor's Degree; or
- (iii) Bachelor's Degree from a recognized University with nine months training from Government Agro Technical Teacher Training Center of the level of the Certified Teacher Agro Technical (Home Economics); or
- (iv) Bachelor's Degree, from a recognized

18 to 35 years.

- (a) Forty per cent by Initial recruitment; and
- (b) sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service as such and having qualification prescribed for initial recruitment of Certified Teacher (Home Economics):

Provided that if no suitable candidate is available amongst the Primary School Head Teachers for promotion, then the posts will be filled by promotion on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of

Attal [Signature]

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<p>Certified Teacher (Home Economics)</p> <p>Note: In case of non availability of suitable person for promotion, then by initial recruitment.</p>	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-curriculum, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-curriculum, from Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Drawing Master.</p> <p>Note: In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
<p>University with one year vocational training from any Government training center or institute with nine months training from Government Agro Technical Teacher Training center of the level of certified Teacher Agro Technical (Home Economics).</p>	<p>18 to 35 years.</p>
<p>17. Drawing Master (BPS-15).</p>	<p>Bachelor's Degree from a recognized University with one year Drawing Master (DM) course Certificate.</p>

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Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p>Provided that if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
19. Primary School Head Teacher (PSHT) (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20. Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

*Attested*

				with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher.
21.	Primary School Teacher (BPS-12).	(i) Intermediate or equivalent qualification, from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized Institute; or  (ii) Secondary School Certificate, from a recognized Board in second Division with two years Associate Degree in Education from a recognized University..	18 to 35 years.	By initial recruitment on merit at Union Council level: provided that if no suitable candidate within the Union Council is available, then from the adjacent Union Councils on merit.
22.	Qari (BPS-12).	Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized Institution.	18 to 35 years.	By initial recruitment.

A Heelal  
20/1/21



(28)

Annexure "F"

To

The District Education Officer (Male)  
Abbottabad

SUBJECT: DEPARTMENTAL REPRESENTATION / BENEFIT OF  
EXTENSION OF JUDGMENT PASSED IN SERVICE  
APPEAL NO 149/22 DATED 22-6-2023 & 2009 SCMR I

Respect sir,

1. That the applicant was appointed as PTC / PST having prescribed qualification vide appointment office order No. 7948-8050, dated 09.04.2005 and presently working as SPST (BPS-14) at GPS Dakhan Syedian Abbottabad.
2. That in pursuance to the Notification dated 13-11-2012, applicant submitted his file for promotion against the post of PSHT (BPS-15) but the file was returned with the reason that as per new policy 2018 the prescribed qualification for the promotion has been enhanced from intermediate to Bachelor degree.
3. That applicant is eligible for promotion under the policy 2012 as applicant acquired the requisite qualification i-e intermediate in the year 2015.
4. That the new notification dated 30.11.2018 wherein, the requisite educational qualification was enhanced from F.A to

D# 395  
Date 22/6/24

B.A is not applicable in the case of applicant as at the time of appointment, no such term & conditions was incorporated in the appointment order of the applicant.

5. That there is no mention in the notification dated 30.01.2018 that the same would have retrospective effect hence, applicant is eligible for promotion in view of notification dated 13.11.2012.
6. That the common question of law & facts have already been decided by the Honourable Khyber Pakhtunkhwa service Tribunal Peshawar at Camp Court Abbottabad in service appeal No.s 2231/19, 2234/19, 2235/19 and 2237/19 dated 17.03.2021 and appeal No. 149/22 dated 22.06.2023 accepted the appeals and directed the department to consider the cases of promotion of the appellant as per guidelines contained in the promotion policy of 2012.
7. That as per 2009 SCMR is the Service Tribunal or Supreme Court decides a point of law relating to the terms and service of a civil servant which covers not only the case of civil servants who litigated but also of other civil servants who may have not taken any legal proceedings in such case, the dictates & rule of good governance demand that the benefit of such judgment by service Tribunal / Supreme Court be extended to other civil

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servants who not be parties to the litigation instead of compelling them to approach the service the service Tribunal or any other forum.

8. That the valuable rights of the applicat are involved.

Keeping in view of the above fact & Circumstances it is requested that on acceptance of instant Departmental representation applicant may kindly by promoted against the post of PSHT(BPS-15) with effect from the date when juniors teachers were promoted with all constitutional back benefits

Dated:- 23/06/2024

  
(AMJAD HUSSAIN)  
SPST GPS Dhakhan Syedan  
Circle Dhamtour  
Tehsil and District Abbottabad

31

Annexure "G"

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR  
AT CAMP COURT, ABBOTTABAD**

Service Appeal No. 2231/2019



Date of Institution ... 26.12.2019  
Date of Decision .. 17.03.2021

Muhammad Iqbal son of Abdul Kareem Khan, presently S.P.S.T  
G.P.S No.4 Tehsil & District Abbottabad.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary  
Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa  
Peshawar and three others.

... (Respondents)

Muhammad Liaqat,  
Advocate

... For appellant.

Riaz Khan Paindakheil,  
Assistant Advocate General

... For respondents.

ROZINA REHMAN

... MEMBER (J)

ATIQU UR REHMAN WAZIR

... MEMBER (E)


**JUDGMENT**

**ROZINA REHMAN, MEMBER** : This judgment is intended to dispose of

05 connected service appeals which are:

1. Service Appeal No.2231/2019

ATTESTED

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar


2. Service Appeal No. 2234/2019
3. Service Appeal No. 2235/2019
4. Service Appeal No. 2236/2019
5. Service Appeal No. 2237/2019

In view of common questions of law and facts, the above captioned appeals are being disposed of by this order.

2. The relevant facts leading to filing of instant appeals are that appellants were appointed as P.T.C/P.S.T having prescribed qualification. There were duly qualified and eligible for promotion however, promotion was denied only on the strength of amendments brought about through notification dated 30.01.2018 wherein the requisite educational qualification was enhanced from Intermediate to B.A. Some of the appellants also filed Writ Petition before the august Peshawar High Court Abbottabad Bench which was treated as departmental representation and was sent to the respondents for decision which was rejected, hence, the present service appeal.

3. We have heard Muhammad Liaqat Advocate for appellant and Riaz Khan Paindakheil learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Muhammad Liaqat Advocate counsel appearing on behalf of appellants, inter-alia, contended that the order dated 18.12.2019 is against law and facts which is void ab-initio and without legal authority. He argued that the impugned order is against the policy as a meeting

ATTESTED  
  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

was held on 08.05.2018 wherein issue of promotion was discussed at Serial No.10 and all the D.E.Os were directed that the promotion cases of the P.S.Ts to S.P.S.Ts/P.S.H.T must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment. Learned counsel further submitted that the notification dated 30.11.2018 is not applicable in the case of appellants as at the time of their appointment, no such terms & conditions were incorporated in the appointment order of the appellants, hence, notification mentioned above has no legal value in the case of appellants and they are eligible for promotion in view of notification dated 13.11.2012.

5. As against that learned A.A.G submitted that as per notification dated 30.11.2018, the requisite qualification for promotion is Bachelor Degree, whereas, appellants do not fulfill the requisite qualification.

6. From the record, it is evident that the respondents had issued a notification dated 13.11.2012, wherein, method of recruitment/promotion has been laid down for Primary School Teachers (P.S.T BPS-12) Senior Primary School Teachers (S.P.S.T BPS-14) and Primary School Head Teachers (P.S.H.T B.P.S-15). Criteria for promotion from P.S.T to S.P.S.T is on the basis of seniority-cum-fitness with at least five years service with Intermediate or equivalent qualification. Similarly, promotion from S.P.S.T to P.S.H.T is based on seniority-cum-fitness with at least ten years service with Intermediate or equivalent. Appellants were appointed as P.S.T who were holding

ATTESTED  
  
EX. OFFICER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

almost 20-25 years of service with Intermediate qualification obtained during the year 2014-16. Record reveals that the appellants approached the Hon'ble Peshawar High Court in Writ Petition for their promotion on the strength of Promotion Policy 2012 and the High Court converted their petition into departmental appeals with directions to the respondents to consider their grievances and decide the same in accordance with law. The respondents accordingly processed their request but in the meanwhile, certain amendments were made in the promotion policy re-emerging as Promotion Policy 2018, wherein qualification for promotion was enhanced from Intermediate to Bachelor Degree, therefore, their requests were turned down as by now they were not eligible for promotion according to new policy. The appellants were qualified for promotion under the Policy of the year 2012 after obtaining the required qualification in 2014-16 but they were not promoted and their due right of promotion was violated. It is also evident from the Minutes of Meeting dated 16.05.2018 whereby respondent No.2 was conscious of the fact that promotions need to be done as per criteria laid down in 2012 Policy but somehow, the District Education Officer did not comply with such directions which resulted into miscarriage of justice.

7. In view of above, the instant appeals are accepted with direction to the respondents to consider the cases of promotion of the appellants as per guidelines contained in the Promotion Policy of 2012.

ATTESTED  
  
ATTORNEY  
Khair Pakhtunخوا  
Service Tribunal  
Peshawar

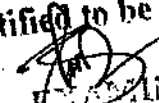
Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.  
17.03.2021

(Rozina Rehman)  
Member (J)  
Camp Court, Abbottabad

(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, Abbottabad

Date of Presentation of Application 10-06-2021  
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**J. M. WAZIR**  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar



36 Annexure "H"

PESHAWAR HIGH COURT,  
ABBOTTABAD BENCH  
FORM 'A'  
FORM OF ORDER SHEET



Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
07.11.2018	<p><u>W.P No. 207-A/2018.</u></p> <p>Present:- Mr. Awais Abbasi, Advocate for the petitioner.</p> <p>Sardar Muhammad Asif, AAG for the respondents.</p> <p>***</p> <p><b><u>SYED MUHAMMAD ATTIQUE SHAH, J.</u></b>- Petitioner</p> <p>Muhammad Ali has invoked the constitutional jurisdiction of this court praying that:-</p> <p><i>"On acceptance of this writ petition, the respondents may graciously be directed to forthwith issue appointment order of the petitioner on the post of PST (BPS-12) with immediate effect in GPS Nagri Tutial Union Council Nagri Tutial or GPS Rahi Union Council Phalla. Any other relief as may be deemed fit and proper in the circumstances of the case."</i></p> <p>2. In essence, the case of petitioner is that as per Clause-I of the advertisement dated 30.08.2016, when no candidate was available in the concerned union council, then the candidate from adjacent union council was to be considered and since the petitioner was hailing from the</p>

SCANNED

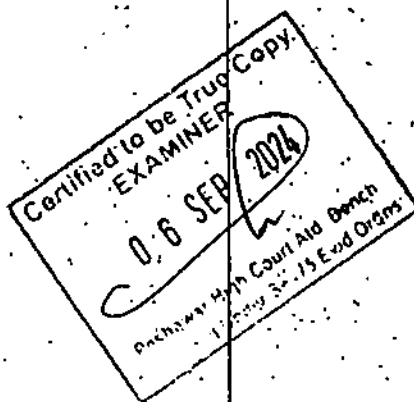
adjacent union council, therefore, he was required to have been appointed on the subject post.

3. Respondents were put on notice who appeared and contested the petition by filing their para-wise comments wherein they have relied upon the notification dated 30.01.2018 whereby amendment was made against Serial No. 1 in column No. 3 & 4 of the appendix to Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and submitted that the petitioner was not having the requisite qualification for his appointment.

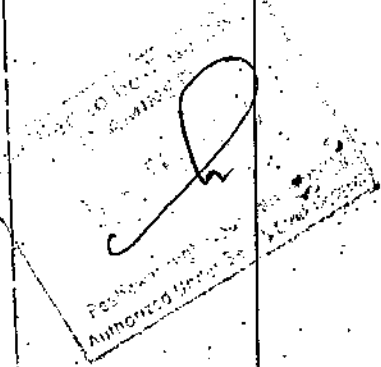
4. Arguments heard and record perused.

5. Perusal of record reveals that the respondents advertised posts of PST through advertisement dated 30.08.2016, wherein it has clearly been mentioned in clause-I of terms and conditions of advertisement that when a candidate in the concerned union council is not available, then the candidate from the adjacent union council would be considered. It is very much clear from the record as well as comments filed by the respondents that the petitioner fulfill the criteria for his appointment against the subject post.

6. So far as the contention of the respondents that in the light of notification No. SO (PE)4-SSSRC/Meeting/2012/Teaching Cadre/2017 dated 30.01.2018, the petitioner was lacking the requisite



qualification, is concerned, suffice it to mention that in advertisement dated 30.08.2016, the respondents advertised certain posts of Primary School Teacher (PST) and the requisite qualification for the said post was mentioned in the advertisement as Intermediate or equivalent certificate from any recognized board along with Primary School Teacher Certificate or SSC Second division along with two years Associate Degree in Education from any recognized University. Consequent to the said advertisement, several candidates including the petitioner, having qualification upto intermediate, have applied for the said post and appeared in the screening test and some of them having the same qualification, were also appointed against the vacant posts after qualifying the test and interview. Moreover, the advertisement was issued on 31.08.2016 and consequent thereof, the appointments were made on 10.04.2017, whereas the amendment in the rules through the ibid notification was made on 30.01.2018. There is no mention in the notification dated 30.01.2018 that the same would have retrospective effect, therefore, the petitioner carrying the qualification mentioned in the advertisement, would not be subject to the ibid amendment and the respondents without any whim and reason have refused to appoint him which is otherwise against the very terms and conditions of their advertisement.



7. Resultantly, while accepting this writ petition, we direct the respondent No. 1 to consider the petitioner for his appointment against the subject post in accordance with law.

Announced  
07.11.2018

*Jain*  
JUDGE

*Mh*  
JUDGE

Tufail

Hon'ble Justices Lal Jan Khattak & Syed Muhammad Attique Shah.

Certified to be True Copy  
EXAMINER  
06 SEP 2024  
Syed Muhammad Attique Shah  
District and Sessions Judge  
District Court, Faisalabad

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**MINUTES OF THE DEOS MEETING WITH DEOS (MFP) ON MAY 08, 2018**

Neer Government School, Shikhar, Holar, Bangalore - 560029

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

PH : 091-925344/ FAX : 0919225345 Email : [zulfiqarulk@gmail.com](mailto:zulfiqarulk@gmail.com)

No. \_\_\_\_\_ Dated \_\_\_\_\_ / \_\_\_\_\_ 2018

Near. Government Shaheed Hussain Sharif Higher Secondary School No-1 City Peshawar

**MINUTES OF THE DPEC MEETING WITH DEOs (M&F) ON MAY 08, 2018**

**Venue:** Committee room of Directorate E&SE KP, Peshawar.

**Timing:** 09:00 AM to 04:00 PM

**Chaired by:** Mr. Farid Khattak Director E&SE KP, Peshawar.

**Particlpants:** List Attached

**Proceedings:**

A meeting was held on 08/05/2018 at committee room of E&SE KP Peshawar. The meeting was chaired by Mr. Farid Ahmad Khattak Director E&SE KP Peshawar local office. The meeting started with the recitation from the holy Quran.

The participants discussed the following agenda items & agreed upon the following points:

S#	Activity	Decislons	Responsibility
1.	Construction of Group Latrines for Girls Students under Conditional Grants 2017-2018	The chair directed DEOs concerned to construct group latrines (only for girls schools) under CG 2017-18 as per the decision of Secretary E&SE in the light of court decision. Work on the rest of schemes /facilities must not be started till the decisions of socio-engineering team.	DEOs
2.	Pending facilities under CG 2014-15, 2015-16 & 2016-17	The chair shared the grievance of worthy Secretary E&SE regarding pending facilities under CG 2014-15, 2015-16 & 2016-17 on which work still not completed. He also directed DDU team to share the list of pending facilities with concern DEOs and also a copy of it may also be provided to the chair. The chairs further directed the concerned DEO to provide school wise lists of pending facilities & complete all such pending work on such facilities may also be monitored on weekly basis.	DDU team, DEOs
3.	Purchase of Science Equipment for Schools, F&F IT Equipment for newly created SDEOs Offices	The chair was informed by a few DEOs that their respective Deputy Commissioners are not willing to convene the purchase committee meetings for the purchase of science equipment F&F and IT equipment for newly established SDEOs offices. The chair directed DEOs to constitute local committee under their personal chairmanship and ensure the utilization of the budget under the said heads up to 30 May 2018 (The target get was set by all the DEOS)	DEOs

**Note:** All employees E&SE department & other interested ones, please type "Follow Dir\_BSE\_KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.

Attested

41



**DIRECTORATE OF ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT KHAYBER PAKHTUNKHWA**  
Ph: 091-9225344/Fax: 091-9225345 Email: [esd@puculmulk@gmail.com](mailto:esd@puculmulk@gmail.com)

No. \_\_\_\_\_ Dated \_\_\_/\_\_\_/2018

**Re: Government School/Hussain Shahi High Secondary School No-1 City Peshawar**

4	Autonomy of HSS	The Chair directed the DEOs to shift the funds under hiring of teachers only in Autonomy budget of HSS to the PTC accounts of the respective school to be utilized on need basis through PTCs afterwards in the new session only for the same purpose of hiring. Chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSSs/GHSSs to discuss the issues in the utilization of autonomy budget and its resolution.	DEOs
5	Release of Remaining 25% budget under non-Salary head.	It was revealed that almost 70% of the budget under Non-Salary head have been utilized therefore the chair directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6	Utilization of Conveyance Charges for Female ASDEOs.	As per the direction of the Secretary ESSE, utilization under this head is alarmingly low, therefore as per decision of the Secretary ESSE the chair further directed DEOs to submit & clear all the pending bills immediately & in future submit all such bills along with relevant documents to the account offices up to 5 <sup>th</sup> of each month for clearance. The bills of previous month (if not cleared for any reason) shall not be paid to the ASDEOs afterwards.	DEOs
7	Reporting of issues regarding budget execution to Directorate	It was revealed in the meeting that some DEOs have issues on part of DC office DO (F&P) and District Govt. with reference to the budget execution in this regard the Deputy Director P&D suggested that they should report such issues well in time to Directorate in order to tackle such issues immediately at proper forums.	DEOs
8	GPS Coordinates for developmental schemes	Regarding PC-1 for developmental schemes Deputy Director P&D suggested the DEOs to send GPS coordinates GIS map location with PC-1 for proper verification of the proposed site. Sample GPS coordinates GIS map sheet will be shared with all DEOs via email.	DEOs DD P&D
9	Vacant Positions	All the DEOs (Male & Female) directed to provide vacant position of all cadres & data regarding retirement of personnel (from 1 <sup>st</sup> April 2018 to 30 <sup>th</sup> September 2018) of each cadre with proper school wise STR must be sent ASAP.	DEOs DD P&D
10	Promotions	The Chair directed the DEOs that the promotions cases of PST to SPST/PSMTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment.	DEOs

**Note:** All employees ESSE department & other interested ones, please type "Follow Dir. ESSE KP" in your mobile messages & send it to "4040" to get free tweets of Directorate of ESSE KP Peshawar on your mobile.

*Attested*  
*[Signature]*

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

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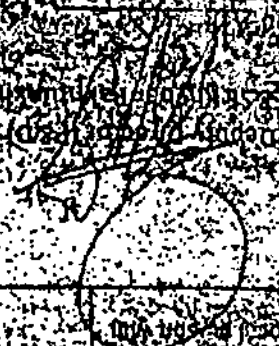
No. \_\_\_\_\_ Dated \_\_\_\_\_ / \_\_\_\_\_ 2018

4.	Autonomy of HSS	The chair directed the DEOs to shift the funds under hiring of teachers (only in Autonomy budget of HSS to the PTC accounts of the respective schools to be utilized on need basis through PTC afterwards in the new session only for the same purpose of meeting. Chair also directed the DEOs to conduct weekly meeting with concerned principals of GHSS/ GGSS to discuss the issues in the utilization of autonomy budget and its resolution.	DEOs
5.	Release of Remaining 25% budget under Non-salary head	It was revealed that almost 70% of the budget under Non-Salary need have been utilized therefore the chair directed DEOs to write a letter to their respective DO (F&P) for the release of remaining 25% budget immediately.	DEOs
6.	Utilization of Conveyance Charges for Female ASDEOs	As per the direction of Secretary E&SE utilization under this head is alarmingly low. Therefore as per decision of the secretary E&SE the chair further directed DEOs to submit & clear all the pending bills immediately & in future submits all such bills along with relevant documents to the account offices up to 5 <sup>th</sup> of each month for clearance. The bills of previous month if not cleared for any reason shall not be paid to one ASDEOs afterwards.	DEOs
7.	Reporting of issues regarding budget execution to Directorate	It was revealed in the meeting that some DEOs have issues on part of DC office DO (F&P) and district Govt with reference to the budget execution. In this regard the Deputy Director P&D suggested that they should report such issues well in time to Directorate in order to tackle such issues immediately at proper forums.	DEOs
8.	GPS Coordinates for development schemes	Regarding PC-1 for developmental schemes Deputy Director P&D suggested the DEOs to send GPS coordinates / GIS map location with PC-1 for proper verification of proposed site. Sample GPS coordinates GIS map sheet will be shared with all DEOs via email.	DEOs DD P&D
9.	Vacant Positions	All the DEOs (Male & Female) directed to provide vacant position of all cadres & data regarding retirement of personnel (from 1 <sup>st</sup> April 2018 to 30 <sup>th</sup> September 2018) of each cadre with proper school wise STR must be sent ASAP.	DEOs DD P&D
10.	Promotions	The chair directed the DEOs that the promotions cases of PST to SPSTs/ PSHTs must be entertained according to the previous policy of promotion while new rules are to be applied for new induction recruitment	DEOs

**Note:** All employees E&SE department & other interested ones, please type "Follow \_ESE\_KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile.

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The central portion of the page contains a large table with a grid structure. The table has approximately 4 columns and 8 rows. Due to the extreme level of noise and grain in the scan, the text within the table cells is completely illegible. The grid lines are faint but clearly visible, defining the layout of the data.

Below the table, there is a horizontal line of text. Like the rest of the page, this text is heavily distorted by noise and is completely unreadable. It appears to be a line of descriptive text or a caption.

42-A

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

PH : 091-925344/ FAX : 0919225345 Email : [zulfiqarulmilk@gmail.com](mailto:zulfiqarulmilk@gmail.com)

No. \_\_\_\_\_ Dated \_\_\_\_\_ / \_\_\_\_\_ 2018

11.	Posting/ Transfer of NTS appointee teachers	The chair directed to implement wedlock policy regarding transfer of employees appointed through NTS in addition to mutual transfers and exigency as per rules and regulations already notified	DEOs
12.	Date time school visit	DEOs to ensure surprise visits of their schools after the duty / hours to prevent the authorize use of school building resource.	DEOs
13.	Communication with District Officials	Chair directed DEOs To respond the official calls /SMS/ emails within the duty hours as well as after the close of business. All of them must follow the official whatsApp group and not to quit it. The officials are advised to use the official whatsApp group for only relevant contents / communications.	DEOs
14.	Scout	DEOs are directed not to follow the orders / instructions/ suggestions of personnel not related to the E&SE department regarding scout activities.	DEOs
15.	Social media communication	With reference of the CS directives all the DEOs (M&F) directed to create their official district level Face book & Twitter accounts, update them regularly and share their proper links along with details of focal person with DD P&D immediately.	

Deputy Director (P&D)  
E&SE Khyber Pakhtunkhwa

Endst No 2742-93 Meeting minutes/DPES-I/Dated 16-05-2018

Copies communicated to:

1. PS to Director local office.
2. All the DEOs (M&F) for information & proper compliance.
3. Office file

sd

Deputy Director (P&D)  
E&SE Khyber Pakhtunkhwa

Note: All employees E&SE department & other interested ones, please type "Follow \_ESE\_KP" in your mobile message & send it to "40404" to get free tweets of Directorate of E&SE KP Peshawar on your mobile

Attested

# وکالت نامہ

کورٹ فیس

43

بعدالت جناب شیخ مجتوبہ خواجہ سروسز بطور بینرل پشاور

عنوان: امیر حسین بنام گورنمنٹ K.P.K. فیڈریشن

منجانب: ایڈووکیٹ

نوعیت مقدمہ: سروسز ایبل

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

## محمد لیاقت ایڈووکیٹ کے واسطے کوڈ دے

کوڈ کیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال و دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہوا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

بمقام:

المقوم:

25/09/24

Accepted by

ایڈووکیٹ امیر حسین ولد امیر العنان کاندھلہ سال SPST گورنمنٹ ہائی اسکول گلشن خیل ایبٹ آباد

0314-5047554