

07.02.2022

Due to retirement of the Hon'able Chairman, the case is adjourned to 07.04.2022 before S.B for the same.


Reader

07.04.2022

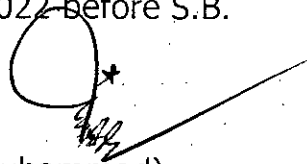
Appellant present in person. Mr. Kabirullah Khattak Adl. AG for respondents present. Written reply on behalf of respondents not submitted. Learned Adl. AG seeks further time for submission of written reply. Request accepted. Another last chance is given. To come up for written reply/comments before S.B on 16.05.2022.


Chairman

16.05.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments on behalf of respondent not submitted. Learned AAG requested for time to submit written reply/comments. Opportunity is granted subject to payment of costs of Rs. 3000/-. To come up for written reply/comments on 21.07.2022 before S.B.


(Mian Muhammad)
Member (E)

14.07.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Respondents have not submitted written reply/comments. Learned AAG is directed to contact the respondents for submission of written reply/comments in office within 10 days, positively. If written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 02.12.2021 before the D.B.

Stipulated period has passed and reply has not been submitted



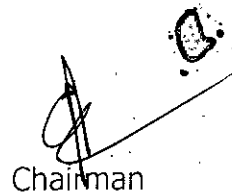
P.S.

28.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.



Chairman



Chairman

02.12.2021

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Written reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Request is acceded ^{to} but as a last chance. To come up for written reply/comments on 07.02.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

30.11.2020

Mr. Nawab Ali Noor, Advocate for appellant is present. Appellant has sought to be set at naught the order dated 13.03.2019 to the extent by allowing promotion to appellant from the date when he was deferred i.e 05.05.2016 alongwith all back benefits instead from 13.03.2019.

The points so agitated at the bar need consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 01.03.2021 before S.B.

Appellant Deposited
Security & Process Fee

36/11/20

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

01.03.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is on leave, therefore, the case is adjourned. To come up for the same before S.B on 06.04.2021.


Reader

06.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 14.07.2021 for the same as before.

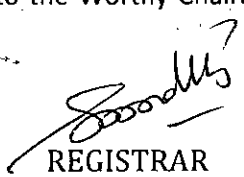

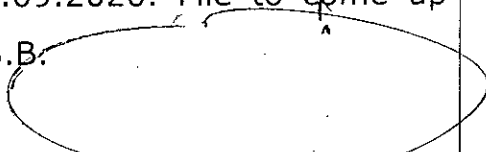
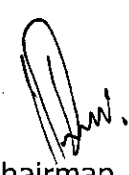

READER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 5809 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/06/2020	<p>The appeal presented today by L.Nawab Ali Noor Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	20.07.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/07/2020</u>.</p> <p> CHAIRMAN</p>
	29.09.2020	<p>Appellant is present. According to him his respective counsel is suffering from fever. Former request for adjournment. Adjourned to 29.09.2020. File to come up for preliminary hearing before S.B.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER</p>
		<p>Appellant with counsel present.</p> <p>Learned counsel seeks adjournment to further prepare the brief. Adjourned to 30.11.2020 for preliminary hearing before S.B.</p> <p> Chairman</p>

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR .

SCANNED
KPST
Peshawar

S.Appeal NO ⁵⁸⁰⁹ OF 2019.

1.Hadyat Ullah s/o Misal Khan R/O Village Marwatan Banda
Tehsil Takht Nasrati District Karak & others.

.....(Appellant).

VERSUS

1.Govt of K.P.K Through Secretary of Elementary & Secondary
Education K.P.K Peshawar & others.

.....(Respondents).

Indix

S.NO.	Description	Annexure	Pages
1.	S.Appeal		1-5
2.	Affidavit		5
3.			
4.	Copy of appointment	A	6
5.	Copy of the B.Ed degrees	B	7
6.	Copy of the DPC, HEC verification	C, D	8-9
7.	Copy of the Judgment	E	10-12
8.	Copy of notification s appeal	F & G	13-16
9.	Wakalat Nama		17

Hadyat Ullah
Petitioner

Through

L.Nawab Ali Noor
Advocate High Court Peshawar.
03469076945

①

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

S. APPALAN O⁵⁸⁰⁰⁹ OF 2019.

1. Hadyat Ullah s/o Misal Khan R/O Village Marwatan Banda
Tehsil Takht Nasrati District Karak.

.....(Petitioner).

VERSUS

1. Govt of K.P.K Through Secretary of Elementary & Secondary
Education K.P.K Peshawar.

2. Director Elementary & Secondary Education K.P.K Peshawar.

3. District Education officer (male) District Karak.

.....(Respondents).

Appeal under section-4 of the N.W.F.P , SERVICE Tribunal Act 1974
against the order dated 13.3.2019 , through which appellant was
promoted to the post of SST but same was without seniority and
back benefit.

PRAYER:

On acceptance of this appeal the order dated 13.3.2019 of the
respondent no.3 may please be set aside to the extent that
promotion to appellant may kindly be allowed from the date of
differ dated ~~10.3.2017~~ along with all kind back benefit instead of
13.3.2019.

Respectfully sheweth:

1. That the appellant belong from the mentioned above addresses in heading of the *Service* appeal.
2. That appellant was appointed as Qari respectively in education department.
(Copies of the appointment order is annexure A).
3. That as per policy of 2014 of K.P.K Education Department the departmental promotion Committees approved name of the appellant for promotion.
4. That appellant was awarded B.Ed Degree from Al khair university of AJK.
(Copy of the B.Ed Degrees as annexure B).
5. That appellant was differ by the DPC being qualified from AL.Khair University.
(Copies of the DPC IS annexure C).
6. That the then appellant approached to the concerned against the same and later on HEC verified the degrees of the appellant. *(copy attached as D)*
7. That in this respect appellant approach the Peshawar High Court Bannu Bench in W.P NO. 77./2018 which was decided on 19.9.2018 .
(Copy of the order as annexure E).
8. That the then appellant was promoted on 13.3.2019 but the same promotion was without seniority and back benefit/ nor from the differ date, *appellant filed appeal on 13/3/20 having no response.*
(Copies of the promotion is annexure F ^{3 copies} & G respectively.

That appelant aggrieved from the same having others no adequate remedy approach this Honorable court on following amongst others

GROUND:

- a. That awarding the promotion, seniority without back benefit/ differ date to appelant was illegal, unlawful, unconstitutional act of the respondents.
- b. That awarding the same relief to one Akhtar Khana Din and deprived from the same benefit from appelant is question of discrimination before this Honorable tribunal.
- c. That after the proper verification of HEC no way to except to award the seniority, promotion to appellant along with back benefit from the differ date.
- d. That another discrimination in respect of one Muhammad Zaman whom was also differ and after the same his appeal was accepted and awarded relief with back benefit reason best known to them.

e. That under the constitution appellant has the same rights like others but same not extend equally which is injustice.

f. That on one side respondents awarded their blue eyed persons and same time appellant treated discriminately.

g. That respondents adopt the policy of pick and chose which is against the basic provision of the constitution and law.

h. That action on the part of respondents amount to misuse of power and approach beyond from the jurisdiction under the law mentioned for.

i. That superior court repeatedly delivered judgment in respect Art.4, 25 etc and present case respondents violate the same also.

j. That under the law being civil servant same is the negligence of the respondents with malafide intention.

It is there most humbly prayed that On acceptance of this appeal the order dated 13.3.2019 of the respondent no.3 may please be set aside to the extent that promotion to appellant may kindly be

allowed from the date of differ dated 5.5.2016 along with all kind back benefit instead of 13.3.2019.

ANY other relief which is not specifically, properly not asked for which the appellat entitle may kindly be allowed .

Through

Hadyat Allah
Appellant

L.Nawab Ali Noor
Advocate High Court
Peshawar.

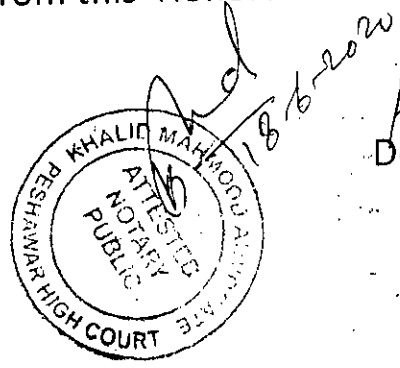
Certificate: certified that no such like s.appeal priorly filed before this Honorable tribunal.

Hadyat Allah

AFFIDAVIT.

I, Hadyat Ullah s/o Misal Khan R/O Village Marwatan Banda Tehsil Takht Nasrati District Karak ,do solemnly affirm and declare on oath that the contents of the accompanying S.Appeal & are true and correct to the best of my knowledge and belief and nothing been kept concealed from this Honorable tribunil.

Attested by
L.Nawab Ali Noor
Advocate



Hadyat Ullah
Deponent.

Ann. A. (6)

9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8 دستخط افسر مجاز	10 Date of termination or appointment تاریخ انقطاع ملازمت	11 reason of termination (such as promotion, transfer, dismissal etc.) وجوہات انقطاع ملازمت ترقی تاراج یا برطرفی	12 Signature of the head of the officer other Attesting Officer دستخط افسر مجاز	Nature and duration of leave taken رضعت کی نوعیت وسعیار	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رضعت کے لئے اوسط تنخواہ کا تعین Period Government to which debitable عرہ	14 Signature of the Head of the office other attesting officer دستخط افسر مجاز	15 Reference to any recorded punishment of censure, or reward, or praised of the Government servants سزایا جزایا غیر مناسب کارکردگی کا ریکارڈ
							Appointed as Jari Post on contract Basis vide E.D.O (S & L) Karak Office Enrolment No. 1624-31/ AE - II / APPN. dt. 3-2-2005
Mr. Qureshi Head Master Govt High School Bahadur Khel (Karak)	30/11/2005	Ret. 9	Mr. Qureshi Head Master Govt High School Bahadur Khel (Karak)				Mr. Qureshi Headmaster S.H.S. Bahadur Khel Head Master Govt High School Bahadur Khel (Karak)
Mr. Qureshi Head Master G.H.S Bahadur Khel Karak	30/11/2006	Prom.	Mr. Qureshi Head Master G.H.S Bahadur Khel Karak				Mr. Qureshi Head Master G.H.S Bahadur Khel Karak
Mr. Qureshi Head Master G.H.S Bahadur Khel Karak	30/11/2006		Mr. Qureshi Head Master G.H.S Bahadur Khel Karak				Passed S.S.C Examination under Roll No 11329 Form B.I.S.G. Number & marks obtained 430/850 Max. 112 at session 1999/A
Mr. Qureshi Head Master G.H.S Bahadur Khel Karak	30/11/2007		Mr. Qureshi Head Master G.H.S Bahadur Khel Karak				Mr. Qureshi Head Master G.H.S Bahadur Khel Karak
Mr. Qureshi Head Master G.H.S Bahadur Khel Karak	30/11/2007		Mr. Qureshi Head Master G.H.S Bahadur Khel Karak				Passed F.Sc Examination under Roll No. 3057 - Form B.I.S.G. Number & obtained 549/1100 Max 112 at session 1996/5
Mr. Qureshi Head Master G.H.S Bahadur Khel Karak	30/11/2007	2-12 upgradation from 207 to BPS 1	Mr. Qureshi Head Master G.H.S Bahadur Khel Karak				Mr. Qureshi Head Master G.H.S Bahadur Khel Karak
Mr. Qureshi Head Master G.H.S Bahadur Khel Karak	30/11/2008	Ret. 7 BPS	Mr. Qureshi Head Master G.H.S Bahadur Khel Karak				Passed B.Sc Examination under Roll No. 8332 Form University of Peshawar & obtained 287/500 Max 112 at session 2007/A

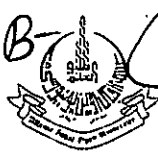
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Mr. Qureshi

1	2	3	4	5	6	7	8
Name of Post	Whether Substantive of officiating any whether permanent or temporary	It officiating state. (1) substantive appointment of (ii) whether service counts for pension under rule 3-20 C.S.R. (Pb) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appoint. Ment	Signature of government servant
		اگر عارضی ہے تو رول کے مطابق پیشین کا مشق ہے؟	تنخواہ بطور عارضی ملازمت	نائد تنخواہ بطور قائم مقام	باسوا کے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
			Rs. Ps.	Rs. Ps.			
Qari							
G.P.H.S Bahadar Khel	عارضی منتقل قائم مقام		Rs 4685/- pm			01-12-2008	Hadayat
do			Rs 4975/- pm			01-12-2008	Hadayat
do			Rs 5285/-			01-12-2009	Hadayat
do			Rs 5595/-			01-12-2010	Hadayat
Qari							
G.P.H.S Saikat			Rs 5595/-			21-12-2010	Hadayat
"			Rs 5595/-				
wef 1-7-2011 B-12			(Rs 7000 - 500 - 2800/-)				
Qari							
G.P.H.S Saikat			Rs 9000/-			17-12-2011	Hadayat
do			Rs 9500/-			12-12-2011	Hadayat
do			Rs 10000/-			12-12-2012	Hadayat
do			Rs 10500/-				

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Anx B-7



Serial 111926

PROVISIONAL RESULT CARD

Name: HADAYAT ULLAH
 Father's Name: MISAL KHAN
 Address: VILL MARWATAN BANDA P/O KHOUAKI KILLA

Roll No. AT623247
 Registration No. 13NKK00656
 Final Semester SPR-2014

Tehsil: TAKHAT-E-NUSRATI
 District: KARAK

has successfully completed MASTER OF EDUCATION (M. ED)
 TEACHER EDUCATION

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 13	0837	EDUCATIONAL RESEARCH	100	67
SPR- 13	0840	EDUCATIONAL PSYCHOLOGY	100	70
SPR- 13	0838	CURRICULUM DEVELOPMENT & INSTRUCTION	100	53
SPR- 13	0831	FOUNDATIONS OF EDUCATION	100	64
AUT- 13	0826	ELEMENTARY EDUCATION	100	67
AUT- 13	0829	TEACHER EDUCATION IN PAKISTAN	100	69
AUT- 13	0827	SECONDARY EDUCATION	100	66
AUT- 13	0828	HIGHER EDUCATION	100	62
SPR- 14	6553	TEXTBOOK DEVELOPMENT-II	100	64
SPR- 14	6552	TEXTBOOK DEVELOPMENT-I	100	66
SPR- 14	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	65
SPR- 14	6505	ISLAMIC SYSTEM OF EDUCATION	100	66

Attested
 Fax
 Head Master
 Govt. High. School Saikot
 Karak

CREDIT HOURS: 36

Total Marks / Obtained

1200 / 779

Result Declared on MARCH 25, 2015

Percentage / Grade

65 B

Date of issue APRIL 15, 2015

Muham

Controller of Examination

Disclaimer: This result-card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

DPC

Ann-C-(B)

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE KARAK

Panel Paper for Departmental Promotion Committees for the Promotion of SQARI/QARI to SST Phy+Maths B-16

Total Vacant Post 5+20=25	Abroad vacant	SNE 2017	Reserved for NTS 2017	NTS 2017	NTS 2017	NTS 2017	NTS 2017	NTS 2017	Total Prom	Total NTS
5+20=25	5	20	0	5	11	5	14	2	24	40
40% by Promotion from SCT/CT									0	
20% by Promotion from FSII/SPST/ST									0	
4% by Promotion from SDM/DM									0	
4% by Promotion from SA/TAT									2	
4% by Promotion from ST/TT									1	
3% by Promotion from Sr. Qari/Qari									2	
Proposed for promotion:	19	5	20	5	11	5	14	2	24	

S.No	Serial No	Name	Father's Name	School Where Working	D/O Birth	Date of Appointment or as regular Qari	Academic/Professional Qualification			Whether eligible for promotion	Remarks	
							Acad: Qari (BA/B/Sc/M AMSc with subject Bio/Maths Group)	MA	Acad: Qari with Div			
1	53	Muhammad Usman	Muhammad Usman	QMS Sahiwal	5-03-77	3-Feb-05	B.Sc. (A+B) Hons	State Con	2nd	CT+B.Ed. Qari/Misc	Yes	Recommended for promotion

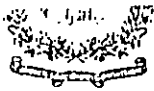
CERTIFICATE.

- It is certified that all the Sqari/Qari (Male) included in the panel for the promotion to SST (Phy+Maths) Post
- Hold the Post on regular basic and non of them is holding the post on adhoc/acting charge basis/contract.
- Have completed the required minimum length of qualification service and qualifications as required for promotion to the post of SST under the Rules.
- None of them is on deputation to any organization under the Federal/Provincial government.
- Neither any disciplinary/departamental proceedings/anti corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- No one is on long leave/Ex-Pakistan Leave.
- Their ACRs Synopsis are free from adverse remarks.
- They are all alive and serving.
- Their appointment orders against Qari Posts are attached herewith.
- The Seniority list of B-10 Qari Posts is attached herewith and not subject to dispute.
- The Departmental Promotion Committee is requested to determine the eligibility of the above SQari/Qari for Promotion to SST B-16 Post with immediate effect.

District Education Officer (Male)
Karak

[Signature]

Attached to be True Copy



ISLAMABAD (PUNJAB)
 Telephone: 0092 51 90400913, Fax: 0092 51 90400902
 URL: <http://www.hec.gov.pk>

9
 Approved D

No. A&A (Att. Cell)/3-1/2019 / 173
 January 16, 2019

District Education Officer (Male),
 Office of the District Education Officer (Male),
 Karak.

Subject: GENUINNESS OF ATTESTATION OF AL-KHAR DEGREE

With reference to your letter No. 280 dated January 14, 2019 in the subject cited above. It is to inform that Bachelor of Education (B.Ed.) degree held by Mr. Hidayat Ullah holder of CNIC 14203-2041645-7 has been attested by the Higher Education Commission vide attestation ticket Number 1697229.

2. This issues with the approval of Competent Authority.

Riaz Ull Haque
 Assistant Director (A&A)

Sohail Abdullatif
 Assistant Director
 Higher Education Commission
 H-9, Islamabad

Attested to be true copy

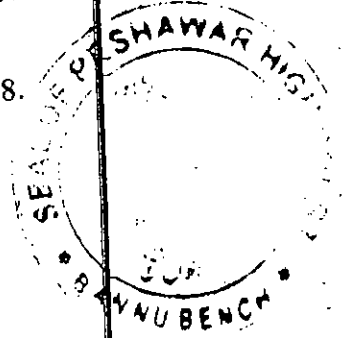
HEC attested B.Ed degree

Ann. E. (10)

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, BANNU BENCH
(Judicial Department)

W.P No.770-B of 2018.

Hidayatullah
Vs
Govt of KPK etc.



JUDGMENT

Date of hearing _____ 19.9.2018 _____

Appellant-Petitioner By Masood Iqbal Khatkhat Adv.

Respondent Shahid Hameed Qureshi

Adl. A. G.

Shakeel Ahmad, J.--- Through instant Constitutional

Petition, the petitioner seeks an appropriate writ against the respondents with the following prayer:-

"It is, therefore, most humbly prayed that in acceptance of instant writ petition, the impugned action of the respondent being not promoted the petitioner to BPS-16 may please be declared to be illegal, void ab initio and unsustainable and the respondents may further be directed to promote the petitioner in accordance with law".

ATTESTED

id

Ans - E (11)

2. Brief facts giving rise to the instant Writ petition are that on 13/05.2016 the petitioner was promoted to BPS-15 on the basis of seniority-cum-fitness but was refused by him due to some domestic problems; that respondent No.3 has issued promotion order in the year 2017 showing the name of the petitioner at S.No.01 but respondent No.3 has refused the name of the petitioner without any reason wherein at Seniority list, the petitioner is show at S.No.53 and thereafter on 12.10.2017 one Akhter Khan Din was promoted while petitioner's case was ignored; that the petitioner moved appeal against the discrimination but invalid. Hence the instant Writ petition.

3. At the very outset of the arguments, learned counsel for the petitioner stated that if his appeal for the promotion to the post of SS(II), BPS-16 is sent to the respondents for considering the same in accordance with law, rules and policy on the subject, he would be satisfied and would not press the instant Writ petition.

ATTESTED
EXAMINER

Attested

Ann. E (12)

100

In view of the above, this petition is converted into departmental appeal and is sent to the respondent No.3 with the direction to decide the fate of the case within one month from the date of receipt of this order, in accordance with law, rules, and policy on the subject matter. This Writ petition is disposed of accordingly.

Announced.
19.09.2018

Sd/- Mr. Justice Iqbal Shakoor
Sd/- Mr. Justice Saad Ahmad

CERTIFIED TO BE TRUE COPY
23/9/2018
Exhibitor
Peshawar High Court Sanno Bench
Authorised under Article 87 of
the Constitution of Pakistan Order 1999

24/9/18

[Handwritten signature]

TO BE SUBSTITUTED WITH THE SAME NO AND DATE



District Education Officer (M) Karak

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and Notification of Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Endst No. 4789-94/file No.2/promotion SST B-16 dated 22.2.2019 the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/FTTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) in BPS-16 (Reg 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further adjusted against the vacant post of SST Bio-Chem, Phy-Math and General noted against each".

PROMOTION OF PSHT/SPST/PST TO THE POST OF SST (BIO: CH) BPS-16:

S. No	Sen No	Name of Official	Present Post of posting	Date of Birth	D/of App: as regular PST	To be posted
1	461	Mujeeb ur Rehman	GPS Musaper Algada	10.4.1970	2.5.1998	GHS Totaki
2	538	Raheem Gul	GPS Kundi	1.1.1978	6.4.2004	GHS Esak Khumari
3	597	Hamd ullah	GPS Bagu Khel Bala	1.9.1981	25.7.2006	GHS Palosa Kamari

PROMOTION OF Sr TT/TT TO THE POST OF SST (BIO: CH) BPS-16:

S. No	Sen No	Name of Official	Present Post of posting	Date of Birth	D/of App: as regular TT	To be posted
1	1	Muhammad Shafiq	GMS Aman Kot	3.8.1976	4.5.2005	GHS Hayat Abad

PROMOTION OF Sr Qari/Qari TO THE POST OF SST (BIO: CH) BPS-16:

S. No	Sen No	Name of Official	Present Post of posting	Date of Birth	D/of App: as regular Qari	To be posted
1	67	Gul Sali Khan	GHSS Jandri	1.2.1980	23.4.2012	GHSS Jandri

PROMOTION OF SCT/CT TO THE POST OF SST (PHY-MATH) BPS-16:

S. No	Sen No	Name of Official	Present Post of posting	Date of Birth	D/of App: as Reg: CT	To be posted
1	236	Abdur Rehman	GHS Garang Siraj Khel	1.4.1974	12.1.1995	GHS Jandri
2	307	Abdul Shakoor	GHS Esaf Khel	1.10.1968	28.1.1997	GHSS Nari Panos
3	335	Noor Alam Khan	GHS Topi Killa	15.4.1977	22.9.2003	GHS Jakoori
4	413	Safi Ullah	GMS Ashkari Ali Khel	2.9.1986	25.4.2012	GHS Sabir Abd
5	415	Abdur Raziq	GMS Siraj-Khel	2.2.1985	26.4.2012	GHS Tarki Khel

PROMOTION OF PSHT/SPST TO THE POST OF SST (PHY-MATH) BPS-16:

S.No	Sen No	Name of Official	Present Post of posting	Date of Birth	D/of App: as-Reg PST	To be posted
1	554	Muhammad Israr	GPS Sikander Khel	11.11.1970	19.5.1992	GHS Tarki Khel
2	771	Mehmood ur Rehman	GPS Odin Shah	1.3.1972	3.9.1995	GHS Jatta Ismail Khel
3	787	Shahid Iqbal	GPS Surdag	1.4.1970	8.10.1995	GHS Kari Dand
4	865	Zahid Mahmood	GPS K...			

Accepted
Principal
GHS Tarki Khel

PROMOTION OF Sr Qari/Qari TO THE POST OF SST (PHY-MATH) BPS-

Annex F-14

S.No	Sen: No	Name of Official	Present Post of posting	Date of Birth	D/of App as Reg PST	To be posted
1	53	Hidayat Ullah	GHS Seikot	5.10.1977	3.2.2005	GHS Kando Khel
2	78	Muhammad Sadq	GHS Latamber	19.1.1992	15.12.2012	GHS Teri

PROMOTION OF SCT/CT TO THE POST OF SST (GENERAL) BPS-16:

S. No	Sen: No	Name of Official	Present Post of posting	Date of Birth	D/of Apt:as Reg:CT	To be posted
1	85	Muhammad Zaman	GMS Warana Mir Hussan Khel	2.12.1968	11.5.1988 16-Apr-90	GMS Warana Mir Hussan Khel Already working as SST OPS GHS Totaki
2	129	Halder Muhammad	GHS khurram	14-Nov-62		GHSS Tapi Kanda
3	134	Aslam Khan	GCMHS Chokara	14-Apr-61	1-Nov-90	GMS Jarasi
4	135	Anar Khan	GHSS Shah Sallm	10-Nov-63	1-Nov-90	GHSS Kando Khel
5	136	Lal Sahib Khan	GHSS Dabli Lawaghar	11-Dec-68	1-Nov-90	GHS Jatta Ismail Khel
6	137	Muhammad Yaseen Khan	GHSS Chanda Khurram	1-Apr-66	3-Nov-90	GHS Ganderi Khattak
7	140	Neg Bad Shah	GHS Garang siraj Khel	15-Jun-66	14-Nov-90	GHS Gumbati Mina Khel
8	141	Musam Khan	GMS Kiri Dhand	1-Nov-67	14-Nov-90	GHS Dresh Khel
9	142	Hamid Ullah Khan	GHS Darash Khel	10-Feb-68	14-Nov-90	GHSS Warana
10	148	Awal Bad Shsh	GHS Ghundi killa	15-Aug-61	22-Jan-91	GMS Official Colony
11	150	Said Hassan	GHS Mitha Khel	1-Jan-63	9-Feb-91	GHS Hayat Abad
12	151	Naarullah Jan	GHS Gurguri	3-Apr-64	9-Feb-91	GHS Dhand Edil Khel
13	152	Ghulam Farooq	GHS Dell Mela	7-Jan-65	9-Feb-91	

PROMOTION OF PSHT/SPST TO THE POST OF SST (GEN:) BPS-16:

S.N	Sen: No	Name of Official	Present Post of posting	Date of Birth	D/of App:as Reg:PST	To be posted
1	16	Rahmat Shah	GPS Esak Khumari	20.3.1962	13.10.1982	GMS Shagi Teri
2	87	Saddi Rehman	GPS Tehran Koi	4.4.1965	10.5.1983	GHS Dabb
3	100	Linqat Ali	GPS Laki Banda	3.2.1963	20.9.1987	GMS Mehmood Khel
4	101	Abdul Latif	GPS Ghundi Killa	3.1.1964	20.9.1987	GHSS Warana
5	104	Muhammad Razaq	GPS Kamali Zara Khel I	3.3.1965	20.9.1987	GMS Walay Banda Dur Algada
6	107	Azam Khan	GPS Chanda Manzai	6.1.1967	20.9.1987	GHSS Chanda Khurram
7	109	Noor Zaman	GPS Zaid Gul Koroona	1.4.1967	20.09.1987	GHS Tarki Khel

PROMOTION OF SDM/DM TO THE POST OF SST (GEN:) BPS-16:

S.N	Sen: No.	Name of Official	Present Post of posting	Date of Birth	D/of App:as reg:DM	To be posted
1	56	Aman Ullah Khan	GHS Ahmed Abad	8.12.1965	22.1.1990	GMS Shnawa Gudi Khel

PROMOTION OF Sr AT/AT TO THE POST OF SST (Gen:) BPS-16:

S.No	Sen: No	Name of Official	Present Post of posting	Date of Birth	D/of App:as Reg:AT	To be posted
1	24	Misal Khan	GHS Gurguri	7.8.1969	21.12.1987	GHS Gurguri

PROMOTION OF Sr TT/TF TO THE POST OF SST (Gen:) BPS-16:

S.No	Sen No	Name of Official	Present Post of posting	Date of Birth	D/of App:as Reg:TT	To be posted
1	45	Munawar Khan	GHS Ghundi Killa	8-Jan-72	27-Jun-97	GHS Latamber
2	46	Muhammad Yaqoob	GHSS Chanda Khurram	4-May-69	1-Jul-97	GHSS Chanda Khurram

PROMOTION OF Sr Qari/Qari TO THE POST OF SST (Gen:) BPS-16:

S.No	Sen: No	Name of Official	Present Post of posting	Date of Birth	D/of App:as Reg:Qari	To be posted
1	46	Rizwan ullah	GHS Manzilni	15-Jan-76	4-Jan-95	GMS Khada Banda
	49	Waseem Sajjad	GHS Paloski	1-Oct-69	5-Apr-99	GHSS Warana

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.
8. Before handing over charge once again their documents be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

Handwritten signature

District Officer Education (M)
Karak.

PRINCIPAL
Govt. High School
Karak

Endst: No. 1663-70 / Promotion SST B-16: Dated Peshawar the 13/3/2019.

Copy forwarded for information and necessary action to the: -

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar with reference to his Office Endst: No cited above for information please.
3. All the Principal /Head Master GHSS, GHS, GMS for necessary action. they are further directed to give a Certificate to the effect that their Post of SST(G) and Science are according to the Criteria of the Govt: of Khyber Pakhtunkhwa if anyone on wrong post their name may e communicated to this Office within week positively otherwise they will be responsible for any consequences.
4. Accountant General Khyber Pakhtunkhwa Peshawar.
5. District Education Officer concerned
6. District Accounts Officer Karak.
7. Official Concerned.
8. M/File

Handwritten signature

District Officer Education (M)
Karak.

Anx-9-16

To

The Director,
Elementary and Secondary Education
Khyber Pakhtunkhawa Peshawar.

Subject: APPEAL THROUGH PROPER CHANNEL FOR SENIORITY AGAINST THE POST OF SST
(MATHS,PHY) WITH ALL BACK BENEFIT.

Respected Sir,

Most respectfully it is stated for your kind honour that we serving in Education Department against SST post but Our promotion was not rnade on due time. So we submit our appeal on the following Ground.

1. That we are appointed against the post of Qari Photo copy of the Service Books are Annex A.
 2. That we have passed our B.Ed Examination form Al-Khair University (AJK) (Copy Annex B).
 3. That the Govt: of Khyber Pakhtunkhawa introduced a Policy for Promotion from Qari to SST whose Qualification are B.A, B.Ed.
 4. That in the DPC May 2016 & July 2017 we are duffer from the Promotion from Qari, SST (Maths, Phy) on the Basis of our B.Ed from Al Khair University.
 5. That due to clashes between the Higher Education Commission and University our B.Ed Degree was not verified by the HEC.
 6. That we Lodged in appeal to the Director E&Se KPK that our Degrees are Genuine and a Responsible teachers and our Promotion be made against the Post of SST(G) & SST (Maths, Phy) being qualified. The Director E&Se KPK file our Appeal for promotion to the post of SST.
 7. That the HEC verified our B.Ed Degree and the DEO(M) Karak submit our Degrees for Genuineness and Genuineness also receive to the DEO(M) Karak. (Copy Annex c)
 8. That in the DPC 2019 we have have promoted to the post of SST vide DEO(M) Karak Endst:No 1663-70/Promotion dated 13-03-2019 without Seniority and Back Benefit. (Copy is Annex D)
 9. The Approval copy of DPC 2019 has clear that those he is duffer from Alkhair University.
- It is humbly requested that our promotion kindly be made from the date of Duffer & Promotion of our other colleague and our seniority be fixed on proper place with all kind of back benefit.
1. Hidayat Ullah Qari GHS Saikot now SST (Maths, Phy) GHSS Kando Khel.

Dated 13.3.20

Hidayat Ullah
Appellant
Hidayat Ullah
SST GHSS
Kando Khel

بعدالت

Before The Service Tribunal K.P.K Peshawar

Appellant

2 مخائب
بنام

Hadyat Ullah

vs

Court of K.P.K through
Secretary (E.S.E.) K.P.K
Peshawar & Others

باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکن کاروائی منسلکہ

آن مقام سپریم سروس ٹریبونل سٹیٹیاور کیلئے اپیل نمبر 2020 میں نوٹس اور فیصلہ دینے کے لئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا۔ نیز
یکیل صاحب کو راضی نامہ کرائے و تقرر نمائش و فیصلہ پر حلف دینے کے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دہائی کے لئے درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرنے کا اختیار ہوگا۔ نیز ضرورت عدم پیروی یا غیری یکمٹر لکھ اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور ذکیل یا مختار قونلی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے
اور اس کا شناختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو ترقی نہ ہوتو اپنے مقدمہ کے
سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر جو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

اللہ اعلم

2020

17 17

المرقوم

معاد العواہ

کے لئے منظور ہے۔

سروس ٹریبونل سٹیٹیاور

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE KARAK

Working paper for Departmental Promotion Committees for the Promotion of SQAVI/QAVI to SST Phy. Mothra B-16

S.No	Name	Father's Name	School Where Working	D/O Birth	Date of Appointment in regular	Acad. Qualification with subject Group	Acad. Qualification with	Acad. Qualification with	Whether eligible for promotion	Remarks	Total Promoted	Total Vacant
Total Vacant Post: 5+20=25												
1	Yes	Head promoted to SST on 7.11.2014	1	1
2	Yes	Head promoted to SST on 7.11.2014	1	2
3	Yes	Head promoted to SST on 7.11.2014	1	3
4	Yes	Head promoted to SST on 7.11.2014	1	4
5	Yes	Head promoted to SST on 7.11.2014	1	5
6	Yes	Head promoted to SST on 7.11.2014	1	6
7	Yes	Head promoted to SST on 7.11.2014	1	7
8	Yes	Head promoted to SST on 7.11.2014	1	8
9	Yes	Head promoted to SST on 7.11.2014	1	9
10	Yes	Head promoted to SST on 7.11.2014	1	10
11	Yes	Head promoted to SST on 7.11.2014	1	11
12	Yes	Head promoted to SST on 7.11.2014	1	12
13	Yes	Head promoted to SST on 7.11.2014	1	13
14	Yes	Head promoted to SST on 7.11.2014	1	14
15	Yes	Head promoted to SST on 7.11.2014	1	15
16	Yes	Head promoted to SST on 7.11.2014	1	16
17	Yes	Head promoted to SST on 7.11.2014	1	17
18	Yes	Head promoted to SST on 7.11.2014	1	18
19	Yes	Head promoted to SST on 7.11.2014	1	19
20	Yes	Head promoted to SST on 7.11.2014	1	20
21	Yes	Head promoted to SST on 7.11.2014	1	21
22	Yes	Head promoted to SST on 7.11.2014	1	22
23	Yes	Head promoted to SST on 7.11.2014	1	23
24	Yes	Head promoted to SST on 7.11.2014	1	24
25	Yes	Head promoted to SST on 7.11.2014	1	25

CERTIFICATE

- It is certified that all the Sqar/Qar (Male) included in the panel for the promotion of to SST (Phy./Maths) Post.
- Hold the Post on regular basis and non of them is holding the post on adhoc/acting charge basis/contract.
- Have completed the required minimum length of qualification service and qualifications as required for promotion to the post of SST under the Rules.
- None of them is on deputation to any organization under the Federal/provincial government.
- Neither any disciplinary/departural proceedings are in progress/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- No one is on long leave/Ex-Pakistan Leave.
- Their ACRs Synopsis are free from adverse remarks.
- They are all alive and serving.
- Their appointment orders against Qar Posts are attached herewith.
- The Seniority list of B-16 Officers is final undisputed and not subject to dispute.
- The Departmental Promotion Committee is requested to determine the suitability of the above Sqar/Qar for Promotion to SST B-16 Post with immediate effect.

District Education Officer (Male)
Karak

[Handwritten Signature]

[Handwritten Signature]



Directorate of Elementary and Secondary Education
KHYBER PAKHTUNKHWA PESHAWAR

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO (PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, Mr. Muhammad Zaman Ex SCT (BPS-16) Government Middle School Mir Hassan Khel (Warana) District Karak is hereby promoted to the post of SST General BPS-16 w.e.f. 05-05-2016 i.e the date from which he occupied the post of SST. The period 05-05-2016 to 21-02-2019 will count for increments but without arrears under Para-7 of the Establishment Department Circular letter No. SORI(S&GAD) 1-29/75 dated 13-04-1987.

Terms and conditions:-

- 1 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 2 His services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
- 3 Charge report should be submitted to all concerned.
- 4 His Inter-Se- seniority on lower post will remain intact.
- 5 No TA/DA is allowed for joining his duty.
- 6 He will give an under taking to be recorded in his service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
- 7 Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

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

Endst: No. 161-66 / P/File Muhammad Zaman SST
Dated Peshawar the 29/5/2019

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Karak.
3. District Accounts Officer Karak.
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

DESIKAMBER
Director (E&SE)
KPK Peshawar.

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

29/5/19

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE KARAK

WITHDRAWL OF CORRIGENDUM ORDER

Reference to letter No. 873/F.No.05/SST (M) Deptt: Promotion Dated Peshawar the 7/9/2017 of Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, Corrigendum order issued vide this office Endst No. 5056/Promotion dated 06.9.2017 is hereby withdrawn as Mr. Akhter Khan Din DM was promoted to the post of SST (Bio/Chem) on the basis of M.Ed acquired from Allam Iqbal Open University being higher qualification.

Endst No 5867-69

District Education Officer
Male Karak

Daetd Karak the 12 / 10 /2017

Copy for information to

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Karak
3. Principal GHSS Shahidan Banda Takht-e-Nasrati.

TA
District Education Officer
AB Male Karak 12/10