

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: **SYED TARIQ ALI SHAH** V/S

EDUCATION DEPTT:

| S# | CONTENTS | YES | NO |
|----|--|-----|----|
| 1 | This Appeal has been presented by: NOOR MOHAMMAD KHATTAK | ✓ | |
| 2 | Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents? | ✓ | |
| 3 | Whether appeal is within time? | ✓ | |
| 4 | Whether the enactment under which the appeal is filed mentioned? | ✓ | |
| 5 | Whether the enactment under which the appeal is filed is correct? | ✓ | |
| 6 | Whether affidavit is appended? | ✓ | |
| 7 | Whether affidavit is duly attested by competent Oath Commissioner? | ✓ | |
| 8 | Whether appeal/annexures are properly paged? | ✓ | |
| 9 | Whether certificate regarding filing any earlier appeal on the subject, furnished? | x | ✓ |
| 10 | Whether annexures are legible? | ✓ | |
| 11 | Whether annexures are attested? | ✓ | |
| 12 | Whether copies of annexures are readable/clear? | ✓ | |
| 13 | Whether copy of appeal is delivered to AG/DAG? | ✓ | |
| 14 | Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents? | ✓ | |
| 15 | Whether numbers of referred cases given are correct? | ✓ | |
| 16 | Whether appeal contains cutting/overwriting? | x | ✓ |
| 17 | Whether list of books has been provided at the end of the appeal? | ✓ | |
| 18 | Whether case relate to this court? | ✓ | |
| 19 | Whether requisite number of spare copies attached? | ✓ | |
| 20 | Whether complete spare copy is filed in separate file cover? | ✓ | |
| 21 | Whether addresses of parties given are complete? | ✓ | |
| 22 | Whether index filed? | ✓ | |
| 23 | Whether index is correct? | ✓ | |
| 24 | Whether Security and Process Fee deposited? On _____ | | |
| 25 | Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____ | | |
| 26 | Whether copies of comments/reply/rejoinder submitted? On _____ | | |
| 27 | Whether copies of comments/reply/rejoinder provided to opposite party? On _____ | | |

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: **NOOR MOHAMMAD KHATTAK**

Signature: _____

Dated: **2021**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 7776 /2021

SYED TARIQ ALI SHA

V/S

EDUCATION DEPTT:

I N D E X

| S.N O | DOCUMENTS | ANNEXURE | PAGE |
|------------------|-----------------------------|-----------------|-------------|
| 1 | Memo of appeal | | 1-4 |
| 2 | Affidavit | | 5 |
| 3 | Stay Application | | 6 |
| 4 | Appointment order | A | 7-8 |
| 5 | Education testimonial | B | 9-27 |
| 6 | Notification dt: 24.07.2014 | C | 28-34 |
| 7 | Notification dt: 24.04.2018 | D | 35-43 |
| 8 | Departmental appeal | E | 44 |
| 9 | Judgment | F | 45-48 |
| 10 | Wakalat Nama | | 49 |

Dated: _____ .11-2021

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE

FLATE NO. 04, 2ND FLOOR,
JUMA KHAN PLAZA, NEAR FATA SECRETARIAT,
WARSAK ROAD, PESHAWAR

0345-9383141

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____/2020

Mr. Sayed Tariq Ali Shah, PST (BPS-12),
GPS, Nath, District Buner.

..... **APPELLANT**

VERSUS

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

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SERVICE RULES NOTIFIED ON 24-7-2014 WHEREBY NOT INCLUDING THE SUBJECT OF COMPUTER SCIENCE IN THE ELIGIBILITY CRITERIA FOR PROMOTION OF PST'S TO THE POST OF SST (BPS-16) AND AGAINST THE SERVICE RULES NOTIFIED ON 24-4-2018 TO THE EXTENT OF S.NO. 2 COLUMN NO.5 OF THE TABLE WHEREBY NO QUOTA HAS BEEN ALLOCATED FOR APPELLANT CADRE i.e. PST (I.T) AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned service rules Notified on 24-07-2014 may kindly be amended/ modified to the extent of serial No. 1B column No.3 of the table by including/ inserting the computer science subject of the appellant in column No. 3 and the impugned service rules dated 24-04-2018 may kindly be amended/ modified to the extent of Serial No. 2 in column No.5 of the table by allocating promotion quota for the appellant's cadre i.e. PST (I.T) and the respondents may further please be directed to consider the appellant for promotion to the posts of SST (BPS-16) or SST (I.T) (BPS-16) with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

2

R/SHEWETH:
ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was appointed as PST in the respondent No.5 Department and is serving the Department quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure..... **A.**
- 2- That it is pertinent to mention here that appellant qualification is Master of Computer Science & M.ED and was appointed/ selected on this qualification in the respondent No.5 department. Copies of the educational testimonial are attached as annexure.....**B.**
- 3- That it is important to mention here that the respondents framed service structure/ rules of the different teaching cadres vide notification dated 24-07-2014, wherein Serial No. 1B the post has been mentioned as SST (BPS-16) for which the qualification and eligibility has been mentioned in column No. 3 i.e. by including all subjects except the subject of appellant i.e. Computer science subject. Copy of the notification dated 24-07-2014 is attached as annexure **C.**
- 4- That it further to mention here that the respondents vide notification dated 24-04-2018 notified service structure/ rules for the different cadres of Information technology including the post of Secondary School Teacher- Information Technology (SST-IT) (BPS-16) on Serial No.2 and in column No.5 of the table wherein eligibility for promotion to the post of SST-IT was mentioned as follows:
 - a) **Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Certified Teacher-IT with five years service as such and having the qualification prescribed for the post of Secondary School Teacher -IT.**
 - b) **Fifty percent by initial recruitment.**But in the said Rules again the cadre of the appellant has been ignored i.e. PST (I.T). Copy of the notification dated 24-04-2018 is attached as annexure..... **D.**
- 5- That appellant feeling aggrieved from both of the notifications mention above had preferred a departmental appeal/ representation. Copy of the departmental appeal is attached as annexure.....**E.**

- 6- That where after the appellant preferred a writ petition No. 596-P/2019 before the August Peshawar High Court, Peshawar and the same was dismissed as not maintainable and the appellant was directed that he may seek his remedy from proper from i.e. Khyber Pakhtunkhwa Service Tribunal Peshawar vide judgment dated 03-09-2020. Copy of the judgment dated 03-09-2020 is attached as annexure..... F.
- 7- That having no other remedy the appellant preferred the instant appeal on the following grounds amongst others.

GROUND:

- A- That the by not including the subject of computer science in the impugned service rules dated 24-07-2014 and not allocating the quota for appellant cadre i.e. PST (I.T) in the impugned service rules dated 24-04-2018 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/ rectified to the extent that subject of computer science in the eligibility criteria in the service rules dated 24-07-2014 may be included and the quota of the appellant cadre be allocated in the service rules dated 24-04-2018.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the said service rules dated 24.7.2014 and 24.4.2018 are violative of Section-9 of the Civil Servant Act, 1973 read with Rule 7 of the Appointment, Promotion and Transfer Rules, 1989.
- D- That the respondents acted in arbitrary and mala fide manner while issuing the impugned service rules dated 24-07-2014 and dated 24-04-2018 by not including the subject of computer science and not allocating the promotion quota for the cadre of appellant quota.
- E- That the act and action of the respondents is discriminatory, therefore not tenable and liable to be modified/ rectified.
- F- That under Article 38(e) of the Constitution of Pakistan 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various service of Pakistan.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: .2021

4
APPELLANT

Tariq

Syed Tariq Ali Shah

THOROUGH:

Noor
NOOR MOHAMMAD KHATTAK

Kamran
KAMRAN KHAN

&

Umar
UMAR FAROOQ MOHMAND

&

Said
SAID KHAN

&

Haider Ali
HAIDAR ALI

ADVOCATES

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2021

SYED TARIQ ALI SHAH VS EDUCATION DEPTT:

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



Tariq

DEPONENT

CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

Tariq

CERTIFICATION

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M. NO. _____/2021

IN

APPEAL NO. _____/2021

SAYED TARIQ ALI SHAH

VS

GOVT: OF KPK & OTHERS

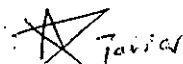
APPLICATION FOR RESTRAINING THE RESPONDENTS
NOT TO FILL UP THE SECONDARY SCHOOL TEACHER
(BPS-16) POSTS FROM PROMOTION QUOTA TILL THE
FINAL DISPOSAL OF THE INSTANT APPEAL

R.SHEWETH:

1. That, the appellant has filed the above titled service appeal before this Honorable Tribunal in which no date has so far been fixed.
2. That, appellant filed the above mentioned service appeal against the impugned service rules dated 24.7.2014 & 24.4.2018 whereby no promotion quota has been allocated for PST (I.T) Cadre.
3. That, all the three ingredients required for grant of stay are in favor of the appellant.
4. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained not to fill up the posts of SST (BPS-16) & SST (I.T) from promotion quota till the disposal of the instant service appeal.

APPELLANT



SAYED TARIQ ALI SHAH

THROUGH:

NOOR MOHAMMAD KHATTAK

ADVOCATE,

High Court Peshawar

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELEMENTARY AND SECONDARY EDUCATION) BUNER

OFFICE ORDER

Consequent upon the advertisement published in Daily Masring and Daily Aaj Dated 11.06.2010 and Test held at IHS Daggar and interview was held at all Tahsils in District Buner and approval given by the Departmental Selection Committee District Buner in its meeting held on 09.12.2010 the undersigned being Competent Authority is pleased to appoint the following PST Male Candidates in B.P. No. 07 (D.O. No. 190-9230) Plus usual allowance as admissible to them under the rule against the vacant post of the schools noted against each w.e.f. the date of their taking over charge in the interest of public service subject to the following existing terms and conditions with immediate effect

60% DISTRICT/OPEN MERIT

| S. NO. | NAME | F/NAME | RESIDENCE | LOCALITY | Total Score | SCHOOL WHERE POSTED |
|--------|---------------------|--------------------|-------------|-------------|-------------|---------------------|
| 1 | ZAFAR ALI | INAYATULLAH | SHALBANJAI | SHALBANJAI | 65.25 | GPS KULYARI |
| 2 | WALID UL HAQ | ROZI KHAN | DAGGAR | DAGGAR | 64.91 | GPS DAGGAR NO. 2 |
| 3 | HAFIZ MAN SYED | SHAH SAID | KULYARI | DEWANA LADA | 64.24 | GPS ALAGRAM |
| 4 | SHAJUL AHMAD | FAZAL RAHIM | REGA | REGA | 64.10 | GPS SAWJARI |
| 5 | SYED TARIQ ALI SHAH | SAID HAMOON SULTAN | MALKA | AM-ZAI | 64.07 | GPS NATHI |
| 6 | SUSHAN ULLAH | MIDRAR ULLAH | ELAI | ELAI | 64.02 | GPS BANDU THANCAY |
| 7 | ZIAU RAHMAN | QARIBUR RAHMAN | JOWAR | MALI KHAI | 63.57 | GPS CHAR |
| 8 | MALIK KHAN | ABDUL WALI QOD | SHALBANJAI | SHALBANJAI | 63.40 | GPS GAGRA |
| 9 | SHAOAR ALI | RAHMAN GHANI | REGA | REGA | 63.37 | GPS KHONA PAIZA |
| 10 | UMAR ALI | MUHAMMAD QAMRUS | DAGGAR OILA | KARAPA | 63.08 | GPS TAGI BAN |
| 11 | HAFIZ ULLAH | RASHID AHMAD | PACHAKALAY | PACHAKALAY | 63.00 | GPS KIJWARA |
| 12 | TARIQ NULLAH | CHERAY | SANGARA | SHALBANJAI | 62.94 | GPS WAKIL ABAD |
| 13 | IN-SIB DAD | LAM QAD | JOWAR | MALI KHAI | 62.74 | GPS DUKADA |
| 14 | ABDULLAH | SHERWAN | CHINGLAI | CHINGLAI | 62.45 | GPS SRO |
| 15 | ANWAR ZE | SHER AFSAR KHAN | KALAN | CHINGLAI | 62.42 | GPS KALAN |
| 16 | SADIK SAID | NOOR SAID | CHEEHA | HORLA | 62.24 | GPS CHEEHA |
| 17 | SADIK MUNIR | BAKHT SHERWAN | KALAPA | CHINGLAI | 62.24 | GPS PANDER |
| 18 | SYED LAHAJI | MUHAMMAD SHAH | REGA | REGA | 62.17 | GPS KUZ SI AMNAL |
| 19 | SYAD ALI | MATEEN | PACHAKALAY | PACHAKALAY | 61.67 | GPS GARIKABAD |
| 20 | IBRAHIM SUK | ANWAR GUL | MALAKPURI | SHALBANJAI | 61.49 | GPS JAWARA |
| 21 | TANIR SAID | MUHAMMAD ZAR | MULAYOUSAF | KARAPA | 61.34 | GPS GUMBAT CHAGARZI |
| 22 | MUHAMMAD J | AMIR GHAMASH | REGA | REGA | 61.12 | GPS RAMZAI |
| 23 | MUHAMMAD NAEEM KHAN | WARIS KHAN | PAUKATH | CHINGLAI | 61.09 | GPS TOHA PATAY |
| 24 | MUHAMMAD SYAZ | MUHAMMAD RAZIQ | KARAPA | KARAPA | 61.07 | GPS KAI APA |
| 25 | MUHAMMAD ALI | AMIR YOSH KHAN | KATAI | PACHAKALAY | 60.97 | GPS KAWSAR ABAD |
| 26 | FAZAL ZADA | SAMI ZADA | HALL | CHINGLAI | 60.96 | GPS TOTALAI NO 1 |
| 27 | MUHAMMAD ALI | NACAR KHAN | CHINGLAI | CHINGLAI | 60.88 | GPS KOT PANDER |
| 28 | MUHAMMAD NAWAZ | HABIB UR RAHMAN | NAWAGAI | NAWAGAI | 60.63 | GPS JANG DARA |
| 29 | MUHAMMAD NAEEM | MUHAMMAD SYAZ | DEWANA LADA | DEWANA LADA | 60.50 | GPS PANCHALAY |
| 30 | FAZAL RAQIB | FAZAL HADI | GHAZI KHAN | GADEZI | 60.48 | GPS DAGAI NO 1 |
| 31 | SYED NASEER UD DIN | SYED HAROON RASHID | JAWKHELA | MALAKPURI | 60.44 | GPS MULA BANDA |
| 32 | ABDUL WADO OD | NIAMAT GUL | YAKH DARA | SHALBANJAI | 60.41 | GPS GUMBAT REGA |
| 33 | SHAMUL HAYAT | TAJ MALOOK | NAWAGAI | NAWAGAI | 60.31 | GPS MASKIPUR |
| 34 | MUHAMMAD ALAM | DAWAR KHAN | TORWARSAK | TORWARSAK | 60.27 | GPS TORWARSAK NO 1 |
| 35 | MUHAMMAD GUL | AMIN GUL | AMINAWAI | CHINGLAI | 60.19 | GPS MANA LAMBALAI |
| 36 | MUHAMMAD SHAM | MUHAMMAD ZAHAN | KAI PANI | GAGRA | 60.16 | GPS MAJGAI JALA |
| 37 | MUHAMMAD ALI | MUHAMMAD RAHMAN | BAZARGAI | CHINGLAI | 59.82 | GPS JOWAR NC 1 |
| 38 | MUHAMMAD ALI | AZIZ UL HAQ KHAN | KULYARI | DEWANA LADA | 59.77 | GPS JAWAR ABAD |
| 39 | MUHAMMAD ALI | ABDUL RAHMAN | MULAYOUSAF | KARAPA | 59.76 | GPS CHAKHAY |
| 40 | MUHAMMAD ALI | MUHAMMAD KHAN | KALAPA | PACHAKALAY | 59.58 | GPS GAGRAIN NO 1 |
| 41 | MUHAMMAD ALI | MUHAMMAD KHAN | KALAPA | DAGGAR | 59.57 | GPS YASIN BANDA |
| 42 | MUHAMMAD ALI | MUHAMMAD KHAN | NAWAGAI | NAWAGAI | 59.37 | GPS SURA NC 3 |

~~ANNEX A~~

8

| S. NO | NAME | FNAME | RESIDANCE | U/C | Total Score | SCHOOL WHERE POSTED |
|-------------------------|-----------------|----------------|-----------|---------|-------------|---------------------|
| 2% DISABLE QUOTA | | | | | | |
| 1 | MUHAMMAD NAEEM | GUL ZABOOR | NAWAGAI | NAWAGAI | 53.03681 | GPS SURA NO.1 |
| 2 | SYED MOHSIN ALI | SYED MAN ZARIN | KARAPA | KARAPA | 54.43074 | GPS KARAPA |

DECEASED QUOTA

| | | | | | | |
|---|-------------------|----------------|-----------|---------|--------|-----------------|
| 1 | ZIAUR RAHMAN | ALI SHERI | GHAZIKOT | SARWAI | 45.765 | GPS TANGORO |
| 2 | MAHBOOR UR RAHMAN | HABIB UR RAHIM | FAIZ ABAD | NAWAGAI | 41.434 | GPS KAWSAR ABAD |

Minority Quota

| | | | | | | |
|---|--------------|---------------|------------|------------|-------|------------|
| 1 | GULDEP KUMAR | NEWAL DAR LAL | GHURGUSHTO | GHURGUSHTO | 53.38 | GPS DANDAR |
|---|--------------|---------------|------------|------------|-------|------------|

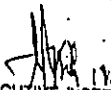
TERMS AND CONDITIONS

- 1- Their appointments are made on contract policy 2005 and they will not be entitled for pension gratuity and are liable to termination at any time without any notice are reason.
- 2- They will be governed by such Rules and Regulations as may prescribed by the Govt. for the category of the Govt. Servants to which they belong from time to time.
- 3- Their services will be terminatable on one month prior notice on either side or payment of one month's pay in lieu thereof.
- 4- The 2 disable Appointee are directed to produce their suitability /Fitness report for teaching job from medical superintendent before taking over charge, otherwise their order will be stand cancelled and next candidate in the merit list will be appointed.
- 5- The DDO Male Buner / ADOs Circle and Head Teacher should furnish certificate to the effect that the candidates have joined posts within 15 days or otherwise the appointment order shall automatically stand canceled.
- 6- They will be on probation for a period of two years.
- 7- Their appointment are subject to further condition that they are domiciled of District Buner for 60% Open Merit/District Merit, Disable and Concerned Union Council in case of 40% Union Council Merit.
- 8- They are required to produce health and age certificate from the concerned Medical Superintendent before taking over-charge.
- 9- They are not allowed to take over charge if their age is less than 18 years and more than 35 years.
- 10- No TA/DA is allowed.
- 11- The DDO Male Buner / ADOs Circle and Head Teacher check their original Certificate/Degree/DMC/and Comical before taking over charge.
- 12- In case of valid appeal of senior most candidates, the junior most candidate in the relevant merit list will be replaced either open merit /District Merit or UC Merit.
- 13- Their Appointments are subject to the verification of all the certificates/degrees/DMC/Domicile if any bogus/fake certificate/degree was found, appointments will be considered atomically cancelled from the date of issue.
- 14- The Deputy District Officer male Buner, ADOs Circle, and Head Teacher may not hand over charge to the appointees if there is no vacant post in the school.
- 15- The Drawing and Disbursing Officer should submit a certificate for release of pay as under:
 Mr. _____ S/O _____ R/O _____ appointed against PST Post at GPS _____ vide order No. _____ at S.No. _____ Total score _____ 60% and 40% his certificates/degrees/DMC and Domicile certificate of District Buner and Union Council _____ have been personally verified and found correct. In case of any discrepancy if detected later on will be the sole responsibility of the undersigned.
 Signature _____ Name _____ DDO /ADO Circle Male Buner.

(MANIF ULLAH)
EXECUTIVE DISTRICT OFFICER
E&S EDUCATION BUNER

Copy No.5875-85 DA.6/7(PST)MDated.20/12/2010

- Copy of the above as forwarded for information and necessary action.
- 1- Director Elementary and Secondary Education KPK Peshawar
 - 2- District Co-ordination Officer Buner
 - 3- Medical Superintendent Buner.
 - 4- District Accountant Officer Buner
 - 5- District Officer (Male) E&S Local Office
 - 6- Deputy District Officer(M) Prg: Buner
 - 7- Principal/Head Master Concerned.
 - 8- ADO (E, Local Office)
 - 9- Budget and Accountant Officer local office
 - 10- The Candidates Concerned.


EXECUTIVE DISTRICT OFFICER
E&S EDUCATION BUNER

~~ATTESTED~~

ANNEX

B
F

9

S.No. 111697

Roll No. 40458



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 2000 - ANNUAL

(Science Group)

This is to Certify that S. Tariq Ali Shah Son / Daughter of S. Haroon Sultan
and a student of Govt. High School, Mansabdar, Swabi has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2000 as a Regular
candidate. He / She obtained 633 Marks out of 850, and has been placed in Grade A Representing Excellent

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

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

Date of birth according to admission form March 8, 1984

Ass. Secretary

Secretary

This certificate is issued without alteration or erasure.

ATTESTED

No. PB No 289576

10

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)

Session 19 2000 (Annual/Supplementary)

Name S. Tariq Ali Sherh

Father's Name S. Hussain Sultan

Roll No. 40458

| SUBJECT | Total Number of marks allotted | MARKS OBTAINED | | | |
|---------------------|--------------------------------|----------------|-----------|-----------|----------------------------|
| | | Theory | Practical | In Figure | In Words |
| 1. English | 150 | | | 116 | |
| 2. Urdu | 150 | | | 108 | |
| 3. Islamiyat | 75 | | | 58 | |
| 4. Pakistan Studies | 75 | | | 50 | |
| 5. Mathematics | 100 | | | 76 | |
| 6. Physics | 100 | 60 | 16 | 76 | |
| 7. Chemistry | 100 | 52 | 22 | 74 | |
| 8. Biology | 100 | 54 | 21 | 75 | |
| Total | 850 | | | 633-A | Six hundred & Thirty Three |

Note: Errors/Omissions excepted
F: Failed in the paper (s)

Prepared by: [Signature]

Checked by: _____

Date _____ 19

20 Jun 2000

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

ATTESTED

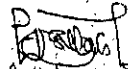
6

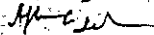
S. No. 01367
Roll No. 23994
Group. Pre-Engineering



Board of Intermediate and Secondary Education
Mardan N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2002-ANNUAL

This is to certify that Syed Tariq Ali Shah son of Syed Haroon Sultan
and a student of Govt. Degree College Swabi Registered No. 128-B/S-2000
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education,
Mardan held on May/June-2002 as a Regular candidate. He obtained 673 Marks out
of 1100 and has been placed in Grade B Representing Very Good. The Examination was
taken as a whole.


Asst. Secretary


Secretary

This certificate is issued without alteration or erasure.

ATTESTED

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION
MARDAN**

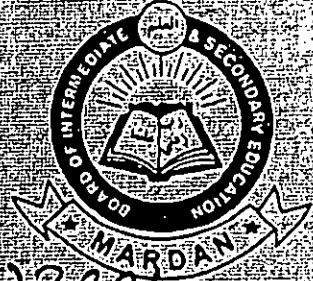
DETAILED MARKS CERTIFICATE

Intermediate Examination (Pre-Engineering Group)

00539

Session 2002

(Annual/Supplementary)



S. No. MBPE-II

PART-II

Name: Syed Tariq Ali Shah

Roll No. 23999

Father's Name: Syed Haroon Sultan

| Subjects | Marks Allotted | | | | Marks Obtained | | | | Total in Figures |
|----------------------|----------------|------------|-----------|-------------|----------------|---------|-----------|--------------|------------------|
| | Part I | Part II | | Total Marks | Part I | Part II | | Total | |
| | | Theory | Practical | | | Theory | Practical | | |
| 1. English | 100 | 100 | | 200 | | | | 90 | |
| 2. Urdu | 100 | 100 | | 200 | | | | 127 | |
| 3. Islamic Education | 50 | | | 50 | | | | 64 | |
| 4. Pakistan Studies | | 50 | | 50 | | | | | |
| 5. Mathematics | 100 | 100 | | 200 | | | | 136 | |
| 6. Physics | 100 | 75 | 25 | 200 | | | | 145 | |
| 7. Chemistry | 100 | 75 | 25 | 200 | | | | 111 | |
| Total | 550 | 500 | 50 | 1100 | | | | 673-B | |

Errors and omissions excepted

Total Marks in Words: Six Hundred

Date: 31-8-2002

Checked by: Tarek

Prepared by: [Signature]

Checked by: [Signature]

[Signature]
Controller of Examination

Board of Intermediate & Secondary Education
MARDAN

ATTESTED

13

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE
Intermediate Examination (Pre-Engineering Group)



S. No: PBPE-I No 057818 Part - I

Session 19 2001 (Annual)

Name Syed Tariq Ali Shah

Father's Name Syed Hameed Sultan Roll No. 9463

| SUBJECT | MARKS ALLOTTED | | | MARKS OBTAINED | | | REMARKS |
|----------------------|----------------|-----------|-------------|----------------|-----------|-------------|---------|
| | Theory | Practical | Total Marks | Theory | Practical | Total Marks | |
| 1. English | 100 | - | 100 | | | 40 | |
| 2. Urdu | 100 | - | 100 | | | 56 | |
| 3. Islamic Education | 50 | - | 50 | | | 38 | |
| 4. Mathematics | 100 | - | 100 | | | 79 | |
| 5. Physics | 75 | 25 | 100 | 65 | 13 | 78 | |
| 6. Chemistry | 75 | 25 | 100 | 44 | 18 | 62 | |
| Total | 500 | 50 | 550 | | | 353 | |

Note: Errors/Omissions excepted

Total Marks in Words Three fifty three

Date 13 D 035 2001 19

Prepared by: [Signature]

Checked by: _____

[Signature]
Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

ATTESTED

~~ATTACHED~~



Result Declared on OCTOBER 03, 2005

Roll No. 6632

Registration No. 2002-6-25

Serial No 036709

Vice Chancellor

Countersigned

Registrar

The Examination was taken as a whole/in parts

in the ^{FIRST} Division

Bachelor of Science

University of Peshawar to the Degree of

examination held in JUNE 2005 is this day admitted by the

of GOVT POSTGRADUATE COLLEGE SWABI having passed the prescribed

and a student S. FARID ALI SHAH SON of S. HAROON SULTAN

Session ANNUAL 2005

(Pakistan)

University of Peshawar

پشاور یونیورسٹی

14

15

University of Peshawar
(Pakistan)



No J01060

Roll No. 1060

DETAILED MARKS CERTIFICATE

B.Sc. Part - 1 Examination, 2004 Supplementary

Name S. Tariq Ali Shah

Father's Name S. Haroon Sultan

Certified that the subjects offered and marks obtained by the candidate are as under:-

| Subject | Maximum Marks | MARKS OBTAINED | |
|---------------------------|---------------|----------------|-------------------------------------|
| | | IN FIGURES | IN WORDS |
| 1. Comp/Science | 75 | 47 | Forty seven |
| 2. Maths A | 75 | 38 | Thirty eight |
| 3. Maths B | 75 | 58 | Fifty eight |
| 4. ISLAMIYAT (COMPULSORY) | 60 | 43 | Forty three |
| TOTAL | 285 | 186 | One hundred & eighty six |

Errors & Omissions are Subject to subsequent rectification.

The Examination was taken as a whole / in parts.

Result Declared on

08 APR. 2005

[Signature]
CONTROLLER OF EXAMINATIONS,
UNIVERSITY OF PESHAWAR.

[Signature]
ATTACHED

16



UNIVERSITY OF PESHAWAR
PAKISTAN

Roll No. 6632

DETAILED MARKS CERTIFICATE

B.Sc Part - II Examination, 2005 Annual / Supplementary

Name S. Tariq Ali Shah

Father's Name S. Haroon Sultan

Certified that the candidate secured the following detailed marks and is placed in 1st Division.

| Subjects | Maximum Marks | MARKS OBTAINED | |
|---------------------|---------------|----------------|-----------------------------|
| | | IN FIGURES | IN WORDS |
| 1. Computer Science | 75 | 52 | Fifty two |
| 2. Maths - A | 75 | 35 | Thirty five |
| 3. Maths - B | 75 | 31 | Thirty one |
| 4. Pakistan Studies | 40 | 26 | Twenty six |
| Pa I Marks | 285 | 186 | |
| TOTAL | 550 | 330 | Three hundred & Thirty only |

The Examination was taken as a whole / in Parts

Prepared by: A

Dated 18.3.2006

S No 000666

CONTROLLER OF EXAMINATIONS,
UNIVERSITY OF PESHAWAR

RECEIVED

17

No. 032253

Registration No. AUBN(E)114-2008

Al-Khair University (AUBN)



Session 2008-2009

This is to certify that

S. Tariq Ali Shah S/O S. Haroon Sultan

has obtained the Degree of

Bachelor of Education

in this University at the Examination held in October, 2009

[Signature]
Controller of Examinations

Bhimber December 24, 2012

ATTES TED



[Signature]
Attestation Officer

24 JAN 2013

[Signature]
Chancellor

HIGHER EDUCATION
COMMISSION OF PAKISTAN
Government of Pakistan
Islamabad

Rs.500 1258625

ATTES TED

Book No. 54Serial No. 5357

AL-KHAIR UNIVERSITY (AJK)



18

DETAILED MARKS CERTIFICATE

This is to certify that Syed Tariq Ali Shah
 Son/Daughter of Syed Haroon Sultan
 Registration No. AUBN(E) 114-2008 Roll No. 4179
 has passed Bachelor of Education Annual/Supplementary Examination
 held in October 2009 in 2nd Division and obtained 644 marks.

The Marks obtained in each subject are given below:-

| Papers | SUBJECTS | Marks Obtained | Maximum Marks |
|---------------------|---|----------------|---------------|
| Compulsory Subjects | | | |
| I | Philosophy & History of Education | 55 | 100 |
| II | Educational Psychology | 49 | 100 |
| III | School Administration | 47 | 100 |
| IV | i. Islamiyat ii. Pakistan iii. Kashmir Studies | 50 | 100 |
| V | i. English Language & Literature ii. Urdu Language & Literature | 61 | 100 |
| Elective Subjects | | | |
| VI-VII | Teaching of Islamic Studies | 96 | 200 |
| VI-VII | Teaching of Pak Studies | 106 | 200 |
| | Practical Skills in Teaching (Part-II) | 180 | 200 |
| TOTAL: | | 644 | 1100 |

Note: This DMC 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/Degree which will be issued under the Regulations in due course.

Muzaffarabad, the 26th February, 2010.

P
C

ATTESTED



HIGHER EDUCATION
COMMISSION OF PAKISTAN

Rs:500 1258624

24 JAN 2010
Higher Education Commission
Government of Pakistan
Islamabad

Asif Iqbal
Attestation Officer

M. Hussain
DY. CONTROLLER OF EXAMINATIONS
for
CONTROLLER OF EXAMINATIONS

ATTESTED

Serial No. 000655
Roll No. 2214

Registration No. 2006-KU/ITM/51

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

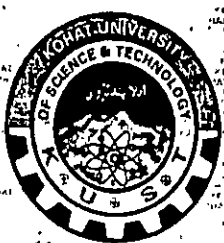
Kohat University of Science & Technology, Kohat (Pakistan)

Certified that S. TARIQ ALI SHAH
Son/Daughter of S. HAROON SULTAN and a student
of INSTITUTE OF INFORMATION TECHNOLOGY KUST having met all the
requirements under the Term / Semester System during the
Sessions 2006-2008 is this day admitted by
the Kohat University of Science & Technology, Kohat to the Degree of
Master of Science

In the FIRST Division

The Subject of examination being COMPUTER SCIENCE

The Examination was taken as a whole / in parts



[Signature]

Controller of Examinations

Countersigned

Result Declared on 27TH APRIL 2009

[Signature]
Vice-Chancellor

APPROVED



KOHAT UNIVERSITY OF SCIENCE & TECHNOLOGY

KOHAT (PAKISTAN)

DETAILED MARKS CERTIFICATE

S.No. **065709**

Master of Computer Science 1st Term Annual Examination 2007

Name: **S. Tariq Ali Shah** Roll No. **K1821**
 Father's Name: **S. Haroon Sultan** Reg No. **2006-KUITM-51**

Certified that the subjects offered and marks obtained by the candidate are as under.

| SUBJECTS | MAXIMUM MARKS | | | | MARKS OBTAINED | | | | | In Words |
|---------------------------------|---------------|------|------|------------|----------------|------|------------|------|------------|--------------------------------|
| | Theo | I.M. | Prac | Total | Theo | I.M. | Total | Prac | Total | |
| Introduction to Programming C++ | 60 | 20 | 20 | 100 | 42 | 15 | 57 | 15 | 72 | Seventy Two |
| Functional English | 60 | 40 | | 100 | 42 | 35 | 77 | | 77 | Seventy Seven |
| Database System | 60 | 40 | | 100 | 34 | 32 | 66 | | 66 | Sixty Six |
| Discrete Structures | 60 | 40 | | 100 | 44 | 29 | 73 | | 73 | Seventy Three |
| Web Programming | 60 | 120 | 200 | 380 | 54 | 112 | 166 | 121 | 283 | Seventy Eight |
| Fundamental of Algorithm | 60 | 120 | 200 | 380 | 46 | 161 | 207 | 17 | 224 | Seventy Nine |
| Total | | | | 600 | | | 445 | | 445 | Four Hundred Forty Five |

The examination was taken as a Whole

To Pass 40% Marks in each Subject (Written & Practical Separately), 45% Marks for Aggregate in each subject & 50% for Aggregate.

Result declared on **25-Jun-07**

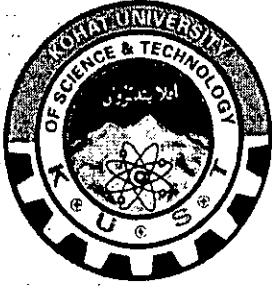
Errors and omissions are subject to subsequent rectification.

(Signature)
 Controller of Examinations
 Kohat University of Science and Technology
 Kohat, Pakistan

ATTACHED

21

Serial No. 015456



Kohat University of Science & Technology, Kohat (Pakistan)

DETAILED MARKS CERTIFICATE

Master of Computer Science 2nd Term, Annual
Examination 2007

Name: S. Tariq Ali Shah
Father's Name: S. Haroon Sultan

Roll No. 1655
Registration No. 2006-KUITM-51

Certified that the subjects offered and marks obtained by the candidate are as under.

| S U B J E C T S | M A X I M U M M A R K S | | | | M A R K S O B T A I N E D | | | | | In Words |
|--|-------------------------|----------|-----------|------------|---------------------------|----------|-------|-----------|------------|---------------------------------|
| | Theory | Internal | Practical | Total | Theory | Internal | Total | Practical | Total | |
| Digital Logic Design & Computer Architecture | 80 | 20 | | 100 | 58 | 16 | 74 | | 74 | Seventy Four |
| Automata Theory & Compiler Construction | 80 | 20 | | 100 | 59 | 14 | 73 | | 73 | Seventy Three |
| Data Structure & Analysis of Algorithm | 80 | 20 | | 100 | 74 | 18 | 92 | | 92 | Ninety Two |
| Object Oriented Programming | 60 | 20 | 20 | 100 | 31 | 14 | 45 | 8 | 53 | Fifty Three |
| Software Engineering-I | 80 | 20 | | 100 | 60 | 17 | 77 | | 77 | Seventy Seven |
| Total | | | | 500 | | | | | 369 | Three Hundred Sixty Nine |

The examination was taken as a Whole

To Pass 40% Marks in each Subject (Written & Practical Separately). 45% Marks for Aggregate in each subject & 50% for Aggregate

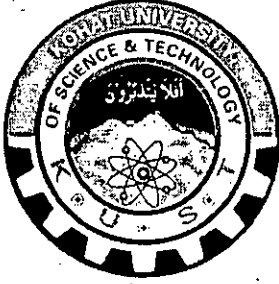
Result declared on 22-Jan-08

Errors and omissions are subject to subsequent rectification.

R

CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan.

ATTACHED



Kohat University

of Science & Technology, Kohat (Pakistan)

DETAILED MARKS CERTIFICATE

Master of Computer Science 3rd Term, Annual Examination 2008

Name: S. Tariq Ali Shah Roll No. 1465
 Father's Name: S. Haroon Sultan Registration No. 2006-KUIITM-51

Certified that the subjects offered and marks obtained by the candidate are as under.

| S U B J E C T S | M A X I M U M M A R K S | | | | M A R K S O B T A I N E D | | | | | | |
|--|-------------------------|----------|-----------|-------|---------------------------|----------|-------|-----------|-------|---------------|--------------------------------|
| | Theory | Internal | Practical | Total | Theory | Internal | Total | Practical | Total | In Words | |
| Visual Programming | 60 | 20 | 20 | 100 | 38 | 14 | 52 | 15 | 67 | Sixty Seven | |
| Operating System Concepts | 60 | 20 | 20 | 100 | 39 | 17 | 56 | 17 | 73 | Seventy Three | |
| Human Computer Interaction | 60 | 20 | 20 | 100 | 43 | 12 | 55 | 17 | 72 | Seventy Two | |
| Artificial Intelligence | 60 | 20 | 20 | 100 | 37 | 17 | 54 | 16 | 70 | Seventy | |
| Data Communication & Computer Networks | 60 | 20 | 20 | 100 | 38 | 16 | 54 | 10 | 64 | Sixty Four | |
| Total | | | | | 500 | | | | | 346 | Three Hundred Forty Six |

The examination was taken as a Whole

To Pass 40% Marks in each Subject (Written & Practical Separately), 45% Marks for Aggregate in each subject & 50% for Aggregate

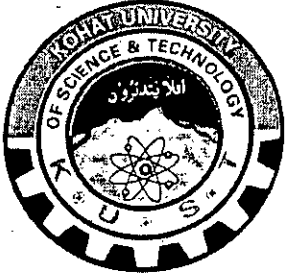
Result declared on 22-Aug-08

CONTROLLER OF EXAMINATIONS
 Kohat University of Science and Technology
 Kohat, Pakistan.

Errors and omissions are subject to subsequent rectification.

ATTESTED

Serial No. 018572



Kohat University

of Science & Technology, Kohat (Pakistan)

DETAILED MARKS CERTIFICATE

Master of Computer Science Final Term, Annual
Examination 2008

Name: S. Tariq Ali ShahRoll No. 2214Father's Name: S. Haroon SultanRegistration No. 2006-KUIITM-51

Certified that the candidate secured the following marks and is placed in 1st Division

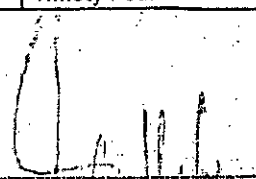
| THEORY | MAXIMUM MARKS | | | | MARKS OBTAINED | | | | | In Words |
|------------------------------------|---------------|----------|-----------|-------------|----------------|----------|-------|-----------|-------------|--|
| | Theory | Internal | Practical | Total | Theory | Internal | Total | Practical | Total | |
| Advance Web Development Techniques | 60 | 20 | 20 | 100 | 42 | 17 | 59 | 14 | 73 | Seventy Three |
| Data Mining | 60 | 20 | 20 | 100 | 43 | 16 | 59 | 16 | 75 | Seventy Five |
| Advance OOP | 60 | 20 | 20 | 100 | 36 | 16 | 52 | 9 | 61 | Sixty One |
| Project / Viva | 200 | | | 200 | 125 | | 125 | | 125 | One Hundred Twenty Five |
| PREVIOUS TERMS MARKS | | | | | | | | | | |
| 1st Term | | | | 600 | | | | | 445 | Four Hundred Forty Five |
| 2nd Term | | | | 500 | | | | | 369 | Three Hundred Sixty Nine |
| 3rd Term | | | | 500 | | | | | 346 | Three Hundred Forty Six |
| Total | | | | 2100 | | | | | 1494 | One Thousand Four Hundred Ninety Four |

The examination was taken as a Whole

To Pass 40% Marks in each Subject (Written & Practical Separately), 45% Marks for Aggregate in each subject & 50% for Aggregate.

Result declared on 27-Apr-09

Errors and omissions are subject to subsequent rectification.


CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan.



24

University of Peshawar

3556

DIRECTORATE OF DISTANCE EDUCATION



PROVISIONAL CERTIFICATE

Session (2015-16)

Roll No. 9562

Date: 03 / 03 / 2017

It is certified that Mr. /Ms. SYED TARIQ ALI SHAH
Son/Daughter of Mr. SYED HAROON SULTAN, a student of Distance Education
has passed the prescribed examination of Master of Education
held in August-September, 2016. During the session his/her conduct was good.

Total marks obtained 490 out of 800 Division 1ST

Result declared on: 28th February, 2017

Taj M Khan
3/3
(DIRECTOR)

Note: This certificate is issued (errors and omissions accepted) as a provisional document only. It has no legal value independent of the result gazette of the University and the degree awarded thereby

ATTESTED



University of Peshawar Pakistan

25

Detailed Marks Certificate

Master of Education (DE)

M.Ed

Annual Examination 2016

Distance Education



Name: SYED TARIQ ALI SHAH

Gender: Male

Roll No: 9562

Father's Name: SYED HAROON SULTAN

Registration No: 2002-S-25

Division: 1st

| Papers | Max Marks | Marks Obtained | |
|-----------------------------------|-----------|----------------|-------------------------|
| | | In Figures | In Words |
| Philosophy of Education | 100 | 72 | Seventy Two |
| Educational Psychology | 100 | 89 | Eighty Nine |
| Educational Planning & Management | 100 | 55 | Fifty Five |
| Curriculum Development | 100 | 67 | Sixty Seven |
| Research Methods | 100 | 44 | Forty Four |
| Measurement & Evaluation | 100 | 56 | Fifty Six |
| Secondary Education in Pakistan | 100 | 51 | Fifty One |
| Thesis Viva | 100 | 56 | Fifty Six |
| | 800 | 490 | Four Hundred and Ninety |

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken As a Whole

Examination held From 18-Aug-2016 to 15-Sep-2016

Result Declared on Tuesday, February 28, 2017

Issue Date: 06-Mar-2017

5:25 pm

Impulsized by RTC

District Bunir

(Dr. Fazal Sher)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

APPROVED

DOMICILE CERTIFICATE

I declare that I was born of Parents who are permanently domiciled in North-West Frontier Province having been born/settled in this Province.

26

I was born at

Village/Mohallah MALKA (Amazi) Tehsil DAGBAR District BUNER

Signature of the applicant
Date 24.8.2000

Pursuance to the declaration dated 24-8-2000 Filed

by Mr./Mrs. S. TORIQ ALI SHAH Son/Daughter of S. HEROON SULTAN

Domiciled in North West Frontier Province it is hereby certified that the said S. TORIQ ALI SHAH is born of parents who are permanent residents of the North West Frontier Province having been settled within it:

I have satisfied myself from my personal knowledge/verification that the above declaration is true and satisfy accordingly.

This 29th day of Sept. 19 2000

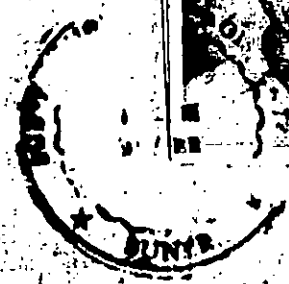
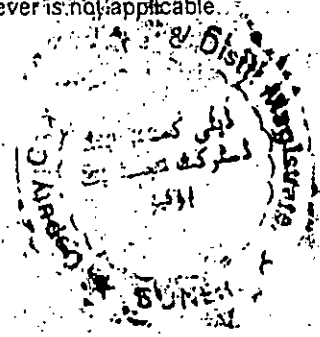
A/c MAGISTRATE 1ST CLASS (B)
(Name Abbas Khan)

No. 5018 /DC (B)
Date 29.9.2000



COUNTERSIGNED
DISTRICT MAGISTRATE - BUNER
Gulam Farooq Khan
(Name Deputy Commissioner Buner)

Strike off which ever is not applicable.



No. 417/Hc/2/D
29.9.2000

RECEIVED

27

لے کر ساری زمینوں کو ایک ہی نام سے لکھ کر دیا جائے گا (مستحقین کے لئے)
مستحقین کو ساری زمینوں کو ایک ہی نام سے لکھ کر دیا جائے گا
مستحقین کو ساری زمینوں کو ایک ہی نام سے لکھ کر دیا جائے گا
مستحقین کو ساری زمینوں کو ایک ہی نام سے لکھ کر دیا جائے گا
2/8/2000

verified as above

TEHSILDAR,
Chamba Distt-Bihar.



Chamba Distt-Bihar

~~RECEIVED~~

28

ANNEX B



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

(1)

RECEIVED

29

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

2025/10/10

[Handwritten signature]

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective columns, namely:

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

Post mentioned

30

Handwritten signature and stamp on the right margin.

(3)

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

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

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

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

(4)

RECEIVED

32

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

- (e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

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

- (f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

33

Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty five percent by initial recruitment.

Note:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

(7)

EXTRAORDINARY
GOVERNMENTREGISTERED NO. P/111
G A Z E T T E**KHYBER PAKHTUNKHWA**

Published by Authority

PESHAWAR, TUESDAY, 24th APRIL, 2018.GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENTNOTIFICATIONPeshawar, dated: 24th April 2017.

No.SO(G)/E&SE/1-85/I.T/2017- 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 the notification issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment & Administration Department and Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in column No. 2 to 5 of the Appendix to the Notification which shall be applicable to the posts of Information Technology Teaching-Cadre (Male/Female) in the Elementary and Secondary Education Department as specified in column No.2 of the said Appendix:

APPENDIX:

| S.No. | Nomenclature of the post | Minimum qualification for appointment by initial recruitment transfer | Age limit | Method of recruitment |
|-------|---|---|-----------|--|
| 1 | 2 | 3 | 4 | 5 |
| | Subject Specialist- Information Technology (SS-IT) (BPS-17) | <p>i. At least Second Class Master's Degree in Computer Science or Information Technology or Bachelor's Degree in Computer Science (BCS/BSCS Honours - 4 years) or equivalent qualification from a recognized University; and</p> <p>ii. Bachelor Degree in Education (B.Ed) or equivalent qualification from a recognized University.</p> <p>Note: A candidate did not have the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.</p> | 21-35 | <p>a) Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years service; and</p> <p>b) Fifty percent by initial recruitment.</p> <p>Provided that if no suitable candidate is available for promotion, then by initial recruitment.</p> |

| | | | |
|---|---|--------------|--|
| <p>2. Secondary School Teacher-Information Technology (SST-IT) (BPS-16)</p> | <p>i. At least Second Class Master's Degree in Computer Science or Information Technology or Bachelor's Degree in Computer Science (BCS/BSCS Honours 4 years) or Bachelor's Degree with a subject of Computer Science or equivalent Qualification from a recognized University; and</p> <p>ii. Bachelor Degree in Education (B.Ed) or equivalent qualification from a recognized University.</p> <p>Note: A candidate did not have the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.</p> | <p>21-35</p> | <p>a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Certified Teacher-IT with five years service as such and having the qualification prescribed for the post of Secondary School Teacher-IT.</p> <p>b). Fifty percent by initial recruitment.</p> <p>Provided that if no suitable candidate is available for promotion, then by initial recruitment.</p> |
| <p>3. Certified Teacher-Information Technology (CT-IT) (BPS-12)</p> | <p>i. At least 2nd Division Intermediate School Certificate or equivalent qualification from a recognized Institution or Board with one year Diploma in Information Technology Computer Science from any recognized institution; and</p> <p>ii. Certified Teacher Certificate (CT) or Associate Degree in Education (ADE) from any recognized institution/ University</p> <p>Note: A candidate did not have the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.</p> | <p>18-35</p> | <p>By initial recruitment.</p> |

PST cadre

50% CT

50% Fresh

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Handwritten stamp and signature

Handwritten signature

Handwritten initials and signature

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

37

Subject: MINUTES OF THE MEETING OF THE SSRC REGARDING ALLOTMENT OF 50% QUOTA TO SST (GEN/SC) FOR PROMOTION TO THE POST OF SS-IT

Meeting of the SSRC regarding the subject matter was held under the Chairmanship of Secretary Elementary & Secondary Education Department on 10/08/2017 at 11:00 am in the committee room of this Department. The following Officers/Officials of the concerned Department/attached Department attended the meeting.

The following attended the meeting:-

1. Dr. Shahzad Khan Bangash, Secretary E&SE Department (In Chair)
2. Mr. Qaisar Alam, Special Secretary (Est.) E&SE Department.
3. Mr. Muhammad Rafiq Khattak, Director E&SE, Peshawar.
4. Mr. Muhammad Shoaib, Deputy Secretary (A), E&SE Department
5. Mr. Javed Siddique, Deputy Secretary (R) Finance Department.
6. Mr. Naik Muhammad, Section Officer (Primary) E&SE Department.
7. Mr. Mohsin Mushtaq, Assistant (R-1) E&AD Department.

2. The forum was informed that E&SE Department vide Notification No. SOG/E&SED/1-86/SS.IT/2016 of E&SE Department Peshawar dated 15.08.2016 has notified the nomenclature of Information Technology Teaching Cadre/Posts serving in the Government High & Higher Secondary Schools of Khyber Pakhtunkhwa of E&SE Department, as Subject Specialist-IT (SS-IT/Computer Science) BPS-17 (Annex-A). Further E&SE Department vide Notification No. SO (PE)4-5/SSRC/Meeting/ 2013/ Teaching Cadre: dated 24/07/2014 has approved promotion to SS posts (BPS-17) from SST (BPS-16). The SST regular having 50% quota of the total sanctioned SS posts allotted for promotion (Annex-B). 50% quota has already been allotted for SSTs (General/Science) in 12 different subjects for Subject Specialist Post. But unfortunately, SSTs (General/Science) who have M.Sc (Computer Science)/BS (CS)/MIT qualification and are eligible for promotion to the post of SS (IT) B-17 have no quota for promotion.

3. In light of the above facts, this Department, therefore, proposed that all those SSTs (General/Science) who have M.Sc. (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS (IT) B-17 like other SSTs, so as to bring uniformity in the teaching cadre.

4. In the above context, the service rules/structure of SST (General/Science) & SST (IT) were approved as tabulated below: -

ATTEST
[Signature]

| Nomenclature of the post | Minimum Qualification for appointment by initial recruitment or by transfer. | Age Limit | Method of recruitment |
|--|--|-----------|--|
| 1. Subject Specialist-Information Technology (SS-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in the Teaching Cadre. | i.) Master Degree in Computer Science/IT at least in 2 nd Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 nd Division from any recognized University. | 21-35 | a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years' service AND Secondary School Teacher (SST) (General/Science) possessing master degree in IT or equivalent qualification with 05 years' experience. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment. Their seniority may be clubbed with SS and amendment may be made in the existing service rules. |
| 2. Secondary School Teacher Information Technology (SST-IT) (B-16) Govt. High / Higher Secondary Schools | i). Bachelor Degree with the subject of Computer Science at least in 2 nd Division / equivalent Qualification from any recognized institution. ii). Bachelor Degree of Education (B. Ed) at least in 2 nd Division from any recognized institution. | 21-35 | a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Computer Lab In-charge with (05) years' service having the qualification prescribed for the post of IT Teacher. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment. |
| 3. Junior Teacher- Information Technology (JT-IT) (B-12) Govt. High/ Higher Secondary Schools | Intermediate or equivalent qualification from any recognized institution with one-year Diploma in IT/Computer Science from any recognized institution and Certified Teacher Certificate/Diploma or equivalent qualification from any recognized institution. | 18-35 | By initial recruitment. |

The committee members discussed the proposed amendments in the service rules in respect of the SST (General/Science) & SST (IT) in depth and were agreed upon unanimously.

The following decisions were made in consensus:-

- i. The proposed amendments in the service rules/structure as depicted in the above table was approved.
- ii. Nomenclature of the post of CT(IT) was changed as Junior Teacher Information Technology (JT-IT)
- iii. Seniority of SST (General/Science) & SST (IT) will be clubbed together immediately for the purpose of promotion in light of the above amended service rules for the post of SST (General/Science) & SST (IT) to the post of SS(IT/Computer Science).

The meeting ended with vote of thanks to/from the Chair.

(Javed Siddique)
Deputy Secretary (R), Finance Department

(Mohsin Mushtaq)
Assistant (R-I), E&AD Deptt:

Naik Muhammad
Section Officer (Primary), E&SE Department

Muhammad Shorib
Deputy Secretary (A), E&SE Deptt:

(Mohammad Rafique Khattak)
Director, E & SE, Peshawar

(Qaiser Akram)
Special Secretary, E&SE Deptt:

Dr. Shahzad Khan Bungash
Secretary E&SE Department
(Chairman)

ATTACHED

GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

40

Dated: Peshawar, the August 15, 2018

SANCTION

No. SC(B&A)/1-18/2018/IT Teacher: Sanction of the Government of Khyber Pakhtunkhwa, is hereby accorded to the creation of posts of Senior IT Teacher (BS-17), IT Teacher (BS-16) and Computer Lab Incharge (BS-12) for the Government High & Higher Secondary Schools in Khyber Pakhtunkhwa, w.e.f. 08-01-2018 as per detail given below, subject to the observance of all codal formalities before incurrence of expenditure.

| Description | Designation of posts | No. of Posts | Remarks |
|--|-------------------------------|--------------|--|
| "150559-Establishment of 500 IT Labs in Govt. High & Higher Secondary Schools in Khyber Pakhtunkhwa" | Senior IT Teacher (BS-17) | 27 | List of schools with their names printed on the back side. |
| | IT Teacher (BS-16) | 172 | |
| | Computer Lab Incharge (BS-12) | 368 | |
| "160151-Establishment of 500 IT Labs in Govt. High Schools in Khyber Pakhtunkhwa (Phase-III)" | IT Teacher (BS-16) | 451 | |
| | Computer Lab Incharge (BS-12) | 458 | |
| | Total | 1476 | |

2. The expenditure involved is debit to the Functional-cum-object classification 09-Education Affairs and Services 092-Secondary Education Affairs and Services 0921-Secondary Education Affairs and Services 092101-Secondary Education A01-Employees Related Expenses and shall be met out from within the Account-IV.

Secretary to Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education Deptt:

Endst No. B&A/2-38/2018-19

Dated Pesh: the 10 / 10 / 2018

Copy of above is forwarded to:

1. The Accountant General Khyber Pakhtunkhwa.
- 2-26. All the District Accounts Officers in Khyber Pakhtunkhwa _____


BUDGET OFFICER-V
FINANCE DEPARTMENT

Endst. of even number & date.

Copy forward for information to the:-

1. The Budget Officer-V, Finance Department, Govt. of Khyber Pakhtunkhwa.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa with the request to circulate the same to all the District Education Officers (M/F).
3. The Project Manager-IT/Deputy Director (EMIS), E & S Education Department.
4. All the Deputy Commissioners in Khyber Pakhtunkhwa.
5. Master File.

ATTACHED


(MURTAZA KHAN)
SECTION OFFICER (BUDGET)

41

| S.NO | Nomenclature of the post | Minimum qualification for appointment by initial recruitment transfer | Age Limit | Method of recruitment |
|------|---|--|-------------|--|
| 1 | 2 | 3 | 4 | 5 |
| 1 | Subject specialist- Information Technology (SS-IT) (BPS-17) | <p>i. At least second class Master's Degree in Computer Science or Information Technology or Bachelor's Degree in computer science (BCS/BSCS Honours 4 years) or equivalent qualification from a recognized University; and</p> <p>ii. Bachelor Degree In Education (B.Ed) or equivalent qualification from a recognized University.</p> <p>Note : A candidate did not have the qualification under clause(ii), shall acquire the same within three years from the date of his/her appointment</p> | 21-35 years | <p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) Twenty percent by promotion on the basis of seniority-cum-fitness from amongst the Certified Teacher-IT with at least five years' service and having the qualification prescribed for the post of Secondary School Teacher-IT</p> <p>Provided that if no suitable candidate is available for promotion then by initial recruitment.</p> <p>(b) Twenty percent by promotion on the basis of seniority-cum-fitness from amongst the Senior Certified Teachers(BPS-16), with at least five years' service as Senior Certified Teacher and Certified Teacher and having the qualification mention in Column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filed by promotion, on the basis of seniority-cum-fitness, from amongst Certified teachers, with at least five years service as such and having qualification mentioned in column No.3:</p> <p>(c) Four percent from amongst the Senior Drawing Master(BPS-16), with at least five years service as senior Drawing Masters and drawing Masters and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filed by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters, with at least five years service as such and having qualification mentioned in column No.3:</p> |

20%
CT-IT

CT
20%

4%
D.M

TESTED

[Handwritten signature]

42

| | | | |
|--|--|--|---|
| | | | <p>(d) Four percent from amongst the Senior Arabic Teachers (BPS-16), with at least five years service as senior Arabic Teachers and Arabic Teachers and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification mentioned in column No.3:</p> <p>(e) Four percent from amongst the Senior Theology Teachers (BPS-16), with at least five years service as senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification mentioned in column No.3:</p> <p>(f) Three percent from amongst the Senior Qaris Teachers (BPS-16), with at least five years service as Senior Qaris Teachers and Qaris Teachers and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Qaris Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Qaris Teachers, with at least five years service as such and having qualification mentioned in column No.3:</p> <p>(g) Twenty percent from amongst the Primary Head Teachers (BPS-16), with at least seven years service as Primary Head Teachers and Senior Primary Teachers and Primary Teachers and having</p> |
|--|--|--|---|

AT 47.

47.
AT

37.
Q.N

207.
PST

af

43

23

| | | | | |
|--|--|--|--|---|
| | | | | <p>qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers, with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers, with at least seven years service as: and having qualification mentioned in column No.3: and</p> <p>(ii) twenty five percent by initial recruitment.</p> <p>NOTE:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment</p> <p>II. Post of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."</p> |
|--|--|--|--|---|

ATTACHED

g

23

To,

ANNEXURE

E

44

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED SERVICER RULES
DATED 24-07-2011 AND 24.04.2018**

Sir,

Most respectfully it is stated that;

I am an employee of your Department and was initially appointed as PST and posted at GPS Nath District Buner. I submitted my arrival report and started performing my duties quite efficiently, whole heartedly and up to the entire satisfaction of my high ups.

That it is pertinent to mention here all the other Primary School Teachers and Certified Teachers have the promotion criteria/quota to the post of SST (general & science). That Service Rules dated 24.07.2014 and 24.04.2018 framed by the respondents no promotion quota has been allocated for the cadres of PST (I.T) and CT (I.T) to the post of SST (I.T) who has the qualification of B.SC in Computer Science.

It is therefore, most kindly requested that on acceptance of this departmental appeal the impugned Service Rules notified on 24-07-2014 may very kindly be amended/modified to the extent of serial No.1B column No.3 of the table by including/inserting the Computer Science Subject of the appellant in column No.3 and the impugned Service Rules dated 24-04-2018 may kindly be amended/modified to the extent of serial No.2 in column No.5 of the table by allocating promotion Quota for the cadres of PST (I.T) in CT (I.T).

Dated: 30/07/2021

Sincerely Yours

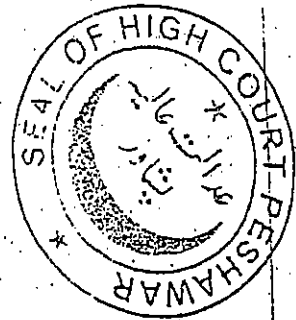
Tariq
Sayed Tariq Ali Shah,
PST GPS Nath, District
Bunier.

JUDGMENT SHEET
PESHAWAR HIGH COURT. PESHAWAR
JUDICIAL DEPARTMENT

W.P. No.596-P/2019

Muhammad Raees Gul and another
Vs.

Government of Khyber Pakhtunkhwa through
Chief Secretary Khyber Pakhtunkhwa,
Peshawar and 06 others



JUDGMENT

Date of hearing 03.09.2020

Mr. Zahid Ullah Zahid, Advocate, for the
petitioners.

Mr. Arshad Ahmad Khan, AAG, for the Provincial
Government, a/w Mr. Jehangir Khan, AD
(Litigation), Directorate of E&SED, Peshawar and
Mr. Dawood Khan, ADO, office of DEO,
Peshawar.

Mr. Aftab Khan, Advocate, for the private
respondent No.7.

LIAZ ANWAR, J. Muhammad Raees
Gul and another, petitioners herein,
through the instant Constitutional petition
under Article 199 of the Constitution of
Islamic Republic of Pakistan, 1973, have
prayed for the following relief:-

*"It is, therefore, most graciously
prayed that while allowing this
writ petition, an appropriate writ
may kindly be issued by declaring
the act of omitting the subject of*

21

~~ATTESTED~~
EXAMINER
Peshawar High Court

ATTESTED
[Signature]

46

Computer Science from promotion to the post of SST is illegal, unlawful, discriminatory and without lawful authority with the direction to consider and include the subject of Computer Science in the criteria for promotion to the post of SST.

Any other relief though not specifically asked for to which the petitioner is found entitled in the circumstances may also be granted".

2. Keeping in view the averments made in the instant petition, comments were called from the respondents who furnished the same accordingly, wherein, they opposed the issuance of desired writ, as prayed for.

3. Arguments heard and record perused.

4. Perusal of the record reveals that petitioners have called in question the recruitment rules notified vide Notification dated 24.07.2014; whereby, according to them, the incumbents, holding the posts of Primary School Teacher (BPS-12) with qualification of

ATTESTED
EXAMINER
Peshawar High

ATTESTED

47

321
Compute Science, are not included in the
feed cadre for the post of Senior Science
Teacher (BPS-16).

5. Learned counsel for the
petitioners has laid much stress upon the
discrimination so meted out to the
petitioners and also about depriving them
from future prospect of promotion, albeit,
we are of the view that questioning the
vires of rules purely relates to the terms
and conditions of service, for which the
proper forum is Khyber Pakhtunkhwa
Service Tribunal established under the
Khyber Pakhtunkhwa Service Tribunals
Act, 1974. Besides, the jurisdiction of
this Court is barred under Article 212 of
the Constitution of Islamic Republic of
Pakistan, 1973. In this regard, reference
can be made to the cases of "LA Sherwani
and others (1991 SCMR 1041)", "Ali
Azhar Khan Baloch (2015 SCMR 456)"
and "Mobeen-ul-Salam (2006 SCMR
100)".

6. Thus, for the reasons recorded
hereinabove and in view of the bar

ATTESTED
EXAMINER,
Peshawar High Court

ATTESTED

contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 and also in view of the availability of alternate remedy to the petitioners, this writ petition is not maintainable. Accordingly, it is dismissed in limine. Needless to observe, that petitioners may approach to the Khyber Pakhtunkhwa Service Tribunal, Peshawar for the redressal of their grievance, if they are so advised.

Announced
Dt: 03.09.2020

JUDGE

JUDGE

(D) Hon'ble Justice Hameed Khan and Hon'ble Mr. Justice Hat Ahmad

2/2/2020/10/20

6285
Date of Presentation of Application: 3/9/2020
No of Pages: 11-2
Copies: 14
Total: 14
Date of Preparation of copy: 7/9/2020
Date of Delivery of copy: 7/9/2020
Received By: [Signature]

[Signature]
CERTIFIED TO BE TRUE COPY
Authorized to issue, under the
of the District District Court, [Location]

07 SEP 2020

RECEIVED

[Signature]

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: _____ OF 2021

Syed Triv Ali Shah (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt. (RESPONDENT)
(DEFENDANT)

I/We Syed Triv Ali Shah
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. _____/_____/2021

Tarika

CLIENTS

[Signature]
ACCEPTED

NOOR MUHAMMAD KHATTAK

[Signature]
KAMRAN KHAN

[Signature]
UMER FAROOQ MOHMAND

[Signature]
SAID KHAN

& *[Signature]*
HAIDER ALI
ADVOCATES

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

No.

7776
Appeal No. Syed Tariq Ali Shah of 20
Appellant/Petitioner

Govt. of KP Chief Secy.
Respondent

4
Respondent No. The Secretary PESH Dep't. KP
Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 25th

Given under my hand and the seal of this Court, at Peshawar this.....
Jan 22
Day of.....20

(For Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

No.

Appeal No. 7776 of 20 20

Syed Tahir Ali Shah Appellant/Petitioner

Versus

Govt. of KPK Chief Secy Respondent

Respondent No. 5

Notice to: — The Director FE&SE KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 25th Day of Jan 20 22

(for Reply)


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

BE SHAWAR
JUDICIAL COMPLEX (OGD) KHAYBER ROAD, B
KHAYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Date of 2020

Given under my hand and the seal of this Court at Peshawar this 27th day of October 2020.

Copy of appeal is attached. Copy of appeal has already been filed.

This appeal petition notice posted to this address by registered post will be deemed sufficient for the purpose of this notice. If you fail to furnish such address you should inform the Registrar of any change in your address to you by registered post. You should inform the Registrar of any alteration in the date fixed for hearing of the appeal petition.

Appeal petition will be heard and decided in your presence. In default of your appearance on the date fixed and in the manner aforesaid, the appeal will be treated as abandoned. You are, therefore, required to appear in person or by authorized representative at the hearing of the appeal petition on the date fixed or any other day to which the hearing is adjourned. If you wish to make any further application in the appeal petition, you must do so on the date fixed or any other day to which the hearing is adjourned. The appeal petition is fixed for hearing before the Registrar of the appeal petition in this Court and notice has been ordered to issue to you.

WHEREAS an appeal petition under the provision of the Khayber Paktunhwa

Notice to: Mr. D. Singh 1-8-20 Mr. K. J. Khan
Respondent No. 2
Respondent
Appellant
of 2020

BE SHAWAR
JUDICIAL COMPLEX (OGD) KHAYBER ROAD, B
KHAYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

2020



"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD
PESHAWAR. 8.B

No.

Appeal No. 7776 of 20 20

Syed Taxir Ali Shah Appellant/Petitioner

Versus

Govt. of KPK Chief Secy Respondent

Respondent No. 2

Notice to: — The Secretary Finance Dept: KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 22/1/22 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 25th

Day of Jan 20 22

(for Reply)

Secy: Finance KPK
 Dairy No.
 Date 25/1/22



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. S.B

No.

Appeal No. 7776 of 20 20
Syed Tariq Ali Shah Appellant/Petitioner
 Versus
Govt. of KPN Chief Secy Respondent
 Respondent No. 3

Notice to: The Secretary Establish ment Deptt. KPN Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration; in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned; the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 25th Day of Jan 20 22

(For Reply)

[Signature]
 PS/Secy E&AD KP
 Diary No. _____ Khyber Pakhtunkhwa Service Tribunal,
 FTS No. _____ Peshawar.

[Signature]
 Registrar,

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, 8B
PESHAWAR.

No.

Appeal No. 7776 of 20 20

Syed Tariq Ali Shah Appellant/Petitioner

Versus
Court of KPK Chief Secy Respondent

Respondent No. 1

Notice to: —

The Court of KPK through Chief Secretary
Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 25th
Day of Jan 20 22

(For Reply)

ISSUED BY
CHIEF SECRETARY
Govt of Khyber Pakhtunkhwa
Peshawar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

APPEAL No. 7776 of 20 20

Syed Tariq Ali Shah

Appellant/Petitioner

Versus

Govt. of KP through Chief Secy.

RESPONDENT(S)

Respondant no. 1 the Govt. of KP

Notice to Appellant/Petitioner

through Chief Secretary Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20/7/22 at 9: am.

(Copy of Appeal already sent)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

for Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

ISSUED BY
CHIEF SECRETARY
GOVT. OF K.P.
15/07/22

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

No.

At 7776 of 20 20
Syed Ali Shah

Appellant/Petitioner

Versus

The Govt. KPK through Chief Secy.

RESPONDENT(S)

Respondent is the Secretary Finance Dept. KPK Peshawar.
Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20/7/22 at 9:00 am.

(Copy of Appeal Already Sent)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

for Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYI

JUNKHWA SERVICE TRIBUNAL, PESHAWAR.

**COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

S.B

No.

No. 7776 of 20 20

Syed Ali Shah

Appellant/Petitioner

Versus

The Govt. KP through Chief Secy.

RESPONDENT(S)

Notice to Respondent 3
Appellant/Petitioner

The Secretary Establishment
Dept. KP Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20/7/22 at 9 am

(Copy of Appeal Already Sent)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

for Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Signature]
E&AD
FILE NO.

"A"

KHYBER

HWA SERVICE TRIBUNAL, PESHAWAR.

COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

7776

20

Sy. Ali Shah

of 20

Appellant/Petitioner

Versus

the Govt. through Chief Secy.

RESPONDENT(S)

Respondent 4

the Secretary ERSE
KPK Peshawar

Notice to Appellant/Petitioner

15/7

Take notice that your appeal has been fixed for Preliminary hearing,
on 20/7/2018 at 9:00 am.
affidavit counter affidavit record/arguments/order before this Tribunal
at

Copy of Appeal Already Sent

You may, therefore, appear before the Tribunal on the said date and at the said
place either personally or through an advocate for presentation of your case, failing
which your appeal shall be liable to be dismissed in default.

for Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

SB

No.

APPEAL No. 7776 of 20 20

Syed Tariq Ali Shah

Appellant/Petitioner

Versus

The Govt. of KP through Chief Secy

RESPONDENT(S)

Notice to Respondent No. 5 Appellant/Petitioner

The Director ERSE
KPK Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20/7/22 at 9.00 am

(Copy of Appeal Already Sent)

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

for Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

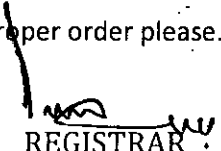


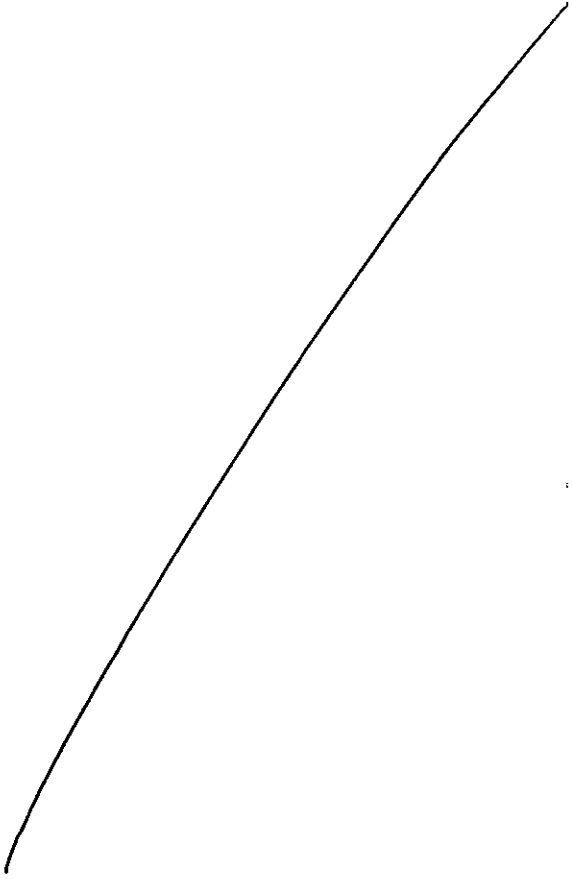
[Signature]
15/7/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 7776/2021 _____

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---|---|
| 1 | 2 | 3 |
| 1- | 19/11/2021 | <p>The appeal of Mr. Syed Syed Tariq Ali Shah presented today by Mr. Noor Mohammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2- |  | <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on 10-01-2022.</p> <p style="text-align: right;"> CHAIRMAN</p>  |

10.01.2022

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 15.03.2022 before the S.B.

Appellant deposited
Security & Process Fee

12/1/22

(Salah-Ud-Din)
Member (J)

15.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 06.6.2022 for the same as before.

Reader.

06.06.2022

Clerk to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General present. Nemo for respondent Department.

Reply on behalf of respondents is still awaited. Notice be issued to all the respondents for submission of comments. To come up for reply/comments on 20.07.2022 before S.B.

(Rozina Rehman)
Member (J)