


10.08.2022

Appellant Deposited  
Security & Process Fee  
10/8

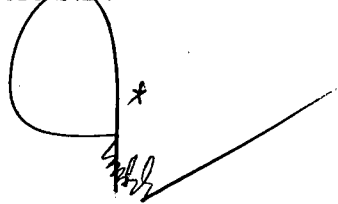
Learned counsel for the appellant present and submitted an application for submission of security and process fee. Application allowed with direction to submit security and process fee within 3 days, thereafter notices be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 06.10.2022 before S.B.

  
(Fareeha Paul)  
Member (E)

06.10.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments have not been submitted. Learned AAG requested for further time. Request is accepted. To come up for written reply/comments on 28.11.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

14.12.2021


Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing on 23.02.2022 before S.B.

  
(MIAN MUHAMMAD)  
MEMBER (E)

24.02.2022

Due to retirement of the Hon'able Chairman, the case is adjourned to 23.05.2022 for the same before D.B.

  
Reader

23<sup>rd</sup> May, 2022

Learned counsel for the appellant present and requests for adjournment in order to properly assist the court. Adjourned. To come up for preliminary hearing before SB on 06.07.2022. *last chance is given.*

  
(Kalim Arshad Khan)  
Chairman

06<sup>th</sup> July, 2022

Learned counsel for the appellant present.

Learned counsel says that appeals against the same order, filed by other appellants have already been admitted and are fixed for 10.08.2022. Therefore, this appeal is also admitted to full hearing, subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee within 10 days. Respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 10.08.2022 before S.B.

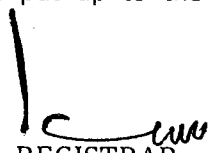

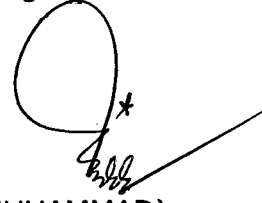
  
(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 7160 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/08/2021	<p>The appeal resubmitted today by Mr. L. Nawab Ali Noor Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>11-10-21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>11.10.2021</p> <p>Clerk of learned counsel for the appellant present.</p> <p>Clerk of learned counsel for the appellant seeks adjournment due to General Strike of the Peshawar Bar Association. Adjourned. To come up for preliminary hearing before the S.B on 14.12.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

S. Appeal NO of 2021.

7160/2

1. Abdur Rauf

.....(Appellant).

VERSUS

1. Govt of K.P.K through chief secretary and others

.....( Respondents).

Index

S.NO.	Description	Annexure	Pages
1.	Appeal and affidavit		1-5
2.	Stay application		6
3.	Appointment order	A	7-8
4.	Notification dated 24.7.14	B	9-12
5.	Notification dated 24.7.18	C	13-15
6.	Departmental Appeal	D	16-17
4	Waklat Nama		18

Appellant

Through

L.Nawab Ali Noor  
Advocate High Court  
Peshawar.  
03469076945

**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.**

1

S. Appeal No. of 2021.

1. Abdur Rauf S/O Ghafoor Ur Rahman GPS no.2 Kohi Barmof Distt Mardan.

.....Appellant

**VERSUS**

1. Govt of K.P.K through Chief Secretary Civil Secretariat Peshawar.

2. Secretary Elementary and Secondary education K.P.K Civil Secretariat , Peshawar.

3. Director Elementary and Secondary education K.P.K Civil Secretariat , Peshawar.

.....Respondents

APPEAL UNDER SECTION - 4 OF THE KHYBER PUKHTOONKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED SERVICE RULES NOTIFICATION DATED 24.7.2014 WHEREBY NOT INCLUDING THE COMPUTER SCIENCE SUBJECT/DEGREE HOLDER IN THE CRITERIA OF ELIGABILITY FOR THE PROMOTION OF PST, IT TO THE POST OF SST BPS -16 SAME IS AGAINST THE SERVICE RULES NOTIFIED IN THE NOTIFICATION DATED 24.4.2018 TO THE EXTENT OF SERIAL NO.2 COLUMN NO.5 OF THE TABLE WHEREBY NO QUOTA HAS BEEN ALLOCATED FOR APPELLANT CATER AS PST IT AND SAME TIME AWARDED TO ALL OTHERS AND TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

**PRAYERS:**

On acceptance of this service appeal this honorable court may graciously be pleased to set aside / declare, null and void / amended / modified the impugned service rules / notification dated 24.7.2014 to the extent of the S.NO. 1 B Column NO.3 the table by including / inserting / amending / Modifying service rules as well as service rules 24.2.2018 also may kindly be / inserting / amending / Modifying to the extent of S.NO. 2 column no. 5 and may please allocate promotion quota for appellant as PST IT for the promotion to the post of SST IT BPS -16 with all back benefit

It is further requested to consider the appellant for promotion for the post of SST IT BPS-16 with all back benefit from 2014 i.e from the date of notification benefit granted to others.

May also awarded the relief of 7 years duration of service also.

**RESPECTFULLY SUBMITTED,**

1. That appellant is civil servant doing their job in education department as PST.

(Copy of the appointment order as annexure A).

2. That appellant is highly educated holding master degree holder in their relevant computer science subject along With PST/CT, BED / MED decrees etc.

~~(Copy of the testimonial as annexure B).~~

3. That it is to be noted by your honor that following six cadres of SST (BPS -16) are there in which the appellant cadre is PST (IT) which is only and lonely cadre of the appellant whom ignored, deprived from the promotion rights.

4. That It is further to be noted that till date even for the appellant cadre as PST.IT, even rules of promotion are completely silent which is further question mark before this honorable court?.

5. That so much so may visit the notification dated 24.7.14 in which for

category a,b,c,d qualification for which properly promotion rules are there and they are awarded the same from the date of notification while on other side appellant with qualification / degree of Computer science , Math A, Math B along with others subject ignored reason best known to them. **Copy of the notification 24.7.14 as annexure G.**

6. That It is further to be noted that till date even for the petitioners cadre ,whose subject is computer science at bachelor level even rules of promotion are complete silent which is further question mark before this honorable court ?.

7. That so much so may visit the notifications dated 24.7.14 ,24.4.2018 very interesting to see that in 24.7.2014 where cadre is there but subject subject ignore while 24.4.2018 subject of computer is there but cadre ignore which is great joke and pure question of discrimination before this Honorable court .

**Copy of notification 24.4.18 is attached as annexure H.**

8. That appellant filed departmental appeal before the competent authority but same is with no response within the statutory period.

**Copy of the Departmental appeal as annexure I.**

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

**GROUNDS:**

- a. That awarding the promotion, seniority back benefit to others while deprived the appellant cadre was/is illegal, unlawful, unconstitutional act of the respondents hence need modified, amend, and set aside the same up to the asking relief .
- b. That awarding the same relief to rest of five categories and deprived from the same benefit appellant and his cadres is question of

discrimination before this Honorable tribunal.

4

- c. That notifications in questions is against the service rules, law ,constitution hence no way except to award the promotion quota to appellant/appellant cadre along with back benefit,from the date of notification .
- d. That under what law and circumstances only appellant/appellant cadre deprived from promotion while rest of all are benefited through same notification and awarded relief with back benefit reason best known to them.
- e. That under the constitution appellant has the same rights like others civil servant but same not extend equally which is injustice.
- f. That act of the respondent to pick and chose is not justified at any cost which is against the basic provision of the constitution, law service rules.
- g. That action on the part of respondents amount to misuse of power and approach beyond from the jurisdiction under the law mentioned for.
- h. That superior court repeatedly delivered judgment in respect ART.4, 25 etc and present case respondents violated the same also.

It is therefore most humbly prayed that on acceptance of this service appeal your honor may graciously be to set aside / declare , null and void/amended /modified the notification dated 24.7.2014 to the extent of the S.NO. 1B column NO.3 of the table by including / inserting/ amending / Modifying service rules as well as service rules 24.2.2018 also may kindly be / inserting/ amending / Modifying to the extent of S.NO. 2 column no. 5 and may please allocate promotion quota for the appellant/appellant cadre.

It is further requested to consider the appellant for promotion for the post of SST IT BPS-16 with all back benefit from 2014 date of notification.



May also awarded the relief of 7 years duration of service also.

5

May please awarded any other relief for which appellant entitled not specifically mentioned deem appropriate may also awarded.

Dated:

*Abdul*  
Appellant

Through

L.Nawab Ali Noor  
Advocate High Court  
Peshawar.

**Certificate:** certified that no such like service. appeal filed before this Honorable tribunal.

L.Nawab Ali Noor  
Advocate High Court  
Peshawar.

**AFFIDAVIT.**

I, Abdur Rauf S/O Ghafoor Ur Rahman GPS-No.2 Kohi Barmof Distt Mardan do solemnly affirm and declare on oath that the contents of the accompanying service Appeal are true and correct to the best of my knowledge and belief and nothing been kept concealed from this Honorable tribunal.

*Abdul*  
Deponent



**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.**

6

S. Appeal No. of 2020.

1. Abdur Rauf S/O Ghafoor Ur Rahman GPS-No.2 Kohi Barmof  
Distt Mardan. .... Appellant.

**VERSUS**

1. Govt of K.P.K Through Chief Secretary K.P.K Peshawar and others.  
..... Respondents

**Application for stay over the appointment of SST till decision.**

**RESPECTFULLY SUBMITTED.**

1. That above titled service appeal is pending before this honorable court for adjudication, and no date of hearing has been fixed so far.
2. That service appeal is read as an integral part of this application.
3. That appellant have a good prima facie and arguable case, balance of convince lies in their favor if temporary injunction not granted will suffer irreparable loss and injury.

Under the above circumstances, humbly prayed that respondent may kindly be restrained from further any promotion till final decision of the instant service appeal

**Through**

**Applicant / Appellant**

**L. Nawab Ali Noor Advocate  
High Court Peshawar.**

**AFFIDAVIT.**

I, Abdur Rauf S/O Ghafoor Ur Rahman GPS-No.2 Kohi Barmof  
Distt Mardan, do solemnly affirm and declare on oath that the contents of the  
accompanying service appeal are true and correct to the best of my knowledge  
and belief and nothing been kept concealed from this Honorable tribunal.

Deponent



Ann A-7

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN**

Consequent upon the recommendations of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the post of Primary School Teacher (PST) on school & U/C based in BPS-12 ( Rs.7000-500-22000) @ Rs. 7000/- Fixed plus usual allowances as admissible under the rules on adhoc basis for the period one year under the existing policy of the Provincial Government, in the Teaching cadre on the terms and conditions given below with effect from the date of their taking over charge in the schools as noted against each:-

S/N	NTS Roll.No.	Name	Date of Birth	Address/U.C	School	Total Score	Remarks
1	2761793	FARZAND ALI BACHA	20-10-81	Vill:But Seri (Baghicha Dheri)	GPS But Seri No 1	104.22	A.V.Post
2	2761782	MUHAMMAD ABID	18-01-79	Vill:But Seri (Baghicha Dheri)	GPS But Seri No 1	100.82	A.V.Post
3	2761528	ZAHID KHAN	27-02-89	Vill:Mandori (Seri Behlool)	GPS Asif Killi	119.16	A.V.Post
4	2761009	Javed Shah	29-07-81	Vill: Babeni (Babeni)	GPS Babeni	120.34	A.V.Post
5	2760951	SARDAR HUSSAIN	01-04-84	Vill:Sadar Abdullah Jan Killi(Babeni)	GPS Haji Muhammad Killi	120.11	A.V.Post
6	2760093	MUHAMMAD HAYAT	16-01-88	Vill:Kodinaka (Babeni)	GPS Khudai Noor Killi	116.51	A.V.Post
7	2761615	IRFAN ULLAH	20-06-88	Vill:Yakhya Jadeed (Babeni)	GPS Nasir Killi	114.05	A.V.Post
8	2761332	Jehangir Khan	05-02-83	Vill: Nasir Killi (Babeni)	GPS Shankar	111.35	A.V.Post
9	2760326	NAWAB KHAN	14-11-80	Vill:Inzargay (Shamozai)	GPS Baghi Shah	130.76	A.V.Post
10	2761052	ZAHID ALI	05-02-84	Vill:Badar Banda (Shamozai)	GPS Shamozai No 1	133.97	A.V.Post
11	2760044	SULEMAN	09-01-92	Vill:Alo (Alo)	GPS Bagi Khel Pipal	117.54	A.V.Post
12	2760358	MUHAMMAD RIAZ	04-10-81	Vill:Alo (Alo)	GPS Janga Bala	123.58	A.V.Post
13	2761694	NOWSHER ALI	17-01-78	Vill:Alo (Alo)	GPS No 1 Pipal	118.29	A.V.Post
14	2761360	SAMI ULLAH	02-02-86	Vill:Pipal Alo	GPS No 1 Pipal	111.6	A.V.Post
15	2760937	ASAD ULLAH KHAN	05-04-89	Vill:Alo (Alo)	GPS No 1 Pipal	111.23	A.V.Post
16	2761060	ZAKIR ULLAH	11-01-91	Vill:Alo (Alo)	GPS No 1 Pipal	109.51	A.V.Post
17	2760279	INAYAT ALI SHAH	10-04-89	Vill:Dheri Killi (Manga)	GPS Bakyana	116.38	A.V.Post
18	2760295	TAHIR ALI	16-05-90	Vill:Machin Korona (Check Hoti)	GPS Tawas Banda	128.4	A.V.Post
19	2760285	MAQSOOD KHAN	20-04-86	Waris Khan Korona (Check Hoti)	GPS Bara	116.35	A.V.Post
20	2760192	MUHAMMAD ARIF	15-03-90	Vill:Tawas Banda (Check Hoti)	GPS No2 Pani Aladad Khel	100.73	A.V.Post
21	2760985	MUHAMMAD ADIL BACHA	14-03-88	Vill:Kaka Khel (Bala Garhi)	GPS Kuz Jumat	121.05	A.V.Post
22	2760350	MUHAMMAD BABAR SHAHZAD	16-01-89	Vill:Bala Garhi (Bala Garhi)	GPS Cham Dheri	115.83	A.V.Post
23	2761629	WASIF KHAN	23-03-89	Vill:Mehmood Abad (Parkho)	GPS Chanchano Khat	130.19	A.V.Post
24	2761616	KAZIM KHAN	15-04-87	Vill:Parkho Dheri ( Parkho)	GPS Chanchano Khat	122.42	A.V.Post
25	2762050	Anwar Khan	27-04-88	Vill: Sanga(Parkho)	GPS Jaill Abad	116.51	A.V.Post
26	2761881	Qazi Gul	12-02-87	Vill: Sanga ( Parkho)	GPS Faras Killi	115.12	A.V.Post
27	2761136	Bakhtiar	10-03-81	Vill: Umar Abad ( Parkho)	GPS Jalil Abad	114.56	A.V.Post
28	2761047	KHALIL IR REHMAN	13-04-76	Vill:Gadar (Fathma)	GPS Dalasa	122.36	A.V.Post
29	2761934	ASHFAQ AHMAD	10-04-84	Vill:Koshmiryano (Fathma)	GPS Dalasa	107.94	A.V.Post
30	2761301	SHAKIRULLAH	05-02-88	Vill:Chagnarzo (Fathma)	GPS Fathma	122.26	A.V.Post

Mx A.8

S/N	NTS Roll.No.	Name	Date of Birth	Address/U.C	School	Total Score	Remarks
31	2760079	MUJEEB UR RAHMAN	15-03-87	Vill:Gadar (Fathma)	GPS Gadar No 1	122.25	A.V.Post
32	2760270	SYED NASRULLAH JAN	01-01-88	Vill:Gadar (Fathma)	GPS Gadar No 1	119	A.V.Post
33	2760315	HUSSAIN AHMAD	12-04-90	Vill:Gadar (Fathma)	GPS Gadar No 1	109.51	A.V.Post
34	2762071	ALAMZEB	07-04-89	Vill:Gadar (Fathma)	GPS Gadar No 1	109.4	A.V.Post
35	2762112	SOHAIL AKHTAR	10-04-88	Vill:Jamal Garhi (Jamal Garhi)	GPS Darmandona	124.14	A.V.Post
36	2761633	MOHAMMAD ASIF	10-03-79	Vill.Gul Bahar (Jamal Garhi)	GPS Sarfaz Killi	120.66	A.V.Post
37	2761995	Muhammad Irfan Shah	16-06-89	Vill: Jamal Garhi(Jamal Garhi)	GPS Sarfaz Killi	117.04	A.V.Post
38	2760049	Irfan Hadi	14-02-91	Vill: Jamal Garhi(Jamal Garhi)	GPS Sarfaz Killi	96.88	A.V.Post
39	2760967	HASSAN MEHMOOD	26-12-83	Vill: Kohi Barmol (Kohi Barmol)	GPS Doshi	128.2	A.V.Post
40	2761746	ABDUR RAUF ✓	18-03-88	Vill: Kohi Barmol (Kohi Barmol)	GPS No 2 Kohi Barmol	120	A.V.Post
41	2760241	MOHAMMAD YOUSAF	22-09-90	Vill: Kohi Barmol (Kohi Barmol)	GPS No 2 Kohi Barmol	113.05	A.V.Post
42	2760218	ABDUL ALIM	12-04-89	Vill: Mian Khan ( Kohi Barmol)	GPS No 2 Kohi Barmol	113.41	A.V.Post
43	2761737	SHAHID NAVEED KHAN	01-02-89	Vill: Kohi Barmol(Kohi Barmol)	GPS No 2 Kohi Barmol	111.16	A.V.Post
44	2761958	ANWAR JAMAL	11-01-84	Vill: Kohi Barmol(Kohi Barmol)	GPS No 1Kohi Barmol	129.3	A.V.Post
45	2761035	SABIR WALI	04-04-89	Vill: Mian Khan ( Kohi Barmol)	GPS No 1 Mian Khan	123.86	A.V.Post
46	2761540	HUKAM DALI -	03-02-77	Vill: Sangao ( Kohi Barmol)	GPS No 1 Sangao	122.78	A.V.Post
47	2760983	Noor Mas Khan	10-01-91	Vill:Mian Khan(Kohi Barmol)	GPS No.2 Kohi Barmol	110.74	A.V.Post
48	2761070	SYED MUHAMMAD SHAKEEL	09-02-81	Vill:Dagai (Dagai)	GPS Faram Koroona	120.26	A.V.Post
49	2761660	MUHAMMAD KAMRAN	27-09-86	Vill:Ghala Dher (Ghala Dher)	GPS Khawo	122.52	A.V.Post
50	2761119	MUHAMMAD ZAHID	13-04-93	Vill: Saeed Abad(Ghala Dher)	GPS No 1 Ghala Dher	114.13	A.V.Post
51	2761630	ABDUL AHAD	12-04-88	Vill: Khao (Ghala Dher)	GPS No 1 Ghala Dher	113.6	A.V.Post
52	2761242	ABDUL SAMAD	15-01-84	Vill:Ghala Dher (Ghala Dher)	GPS Saeed Abad	113.35	A.V.Post
53	2761851	TAJAMMUL HASSAN	28-02-86	Vill: Shamshad Abad( Ghala Dher)	GPS No.1 Ghala Dher	109	A.V.Post
54	2760247	Shakir Ullah	10-02-86	Vill:Wali Abad (Ghala Dher)	GPS Sohbat Abad	104.91	A.V.Post
55	2760061	USMAN ULLAH	15-03-81	Vill:Qasimi (Qasimi)	GPS Ghazi Baba	130.75	A.V.Post
56	2160265	ZAHID MOHAMMAD	15-03-85	Vill:Qasimi (Qasimi)	GPS Ghazi Baba	127.47	A.V.Post
57	2761415	MAJID ALI	10-06-86	Vill:Gujar Garhi (Gujar Garhi)	GPS Gujar Garhi	127.65	A.V.Post
58	2761735	MUHAMMAD SALMAN	12-04-89	Vill:Guli Bagh (Guli Bagh)	GPS Guli Bagh	125.6	A.V.Post
59	2761376	AZIZ UR RAHMAN	15-01-87	Vill:Kotki (Dheri Likpani)	GPS Kotki	139.56	A.V.Post
60	2761839	WAQAS AHMAD	15-02-85	Vill: Kaka Abad(Dheri Likpani)	GPS Haji Abad	136.23	A.V.Post
61	2762012	SAJJAD AHMAD	04-12-78	Vill:Gumbat (Gumbat)	GPS Hayat Gul Koroona	126.33	A.V.Post
62	2761353	SARBILAND KHAN	13-02-87	Vill:Shekh Yousaf (Khazana Dheri)	GPS Shekh Yousaf	125.13	A.V.Post
63	2760117	Riaz Khan	07-01-81	Vill: Khazana Dheri(Khazana Dheri)	GPS Ibrahim Khan Killi	121.73	A.V.Post
64	2762149	Tahir Shah	08-04-83	Vill: Kalo (Mian Essa)	GPS Malo Shah	130.76	A.V.Post
65	2761326	SAJJAD ALI	10-03-88	Vill:Islam Gul Korona (Mian Essa)	GPS Islam Gul Koroona	137.55	A.V.Post
66	2761832	SHAHAB UDDIN	12-04-87	Vill:Shero (Kattang 2)	GPS Kunj	129.43	A.V.Post
67	2762057	MUHAMMAD SAJJAD KHAN	02-03-81	Vill:Shakar Tangi (Kattang 2)	GPS Jan Abad	116.85	A.V.Post
68	2761525	NOOR ULLAH	20-03-89	Vill:Sher Dil Killi (Hatian)	GPS Kaleem Abad	136.41	A.V.Post
69	2761623	ABDULLAH	02-02-90	Vill:Sher Dil Killi (Hatian)	GPD Safi Abad	131.97	A.V.Post

Ans. B(9)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24<sup>th</sup> July, 2014.



NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, 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>IT subject</i>	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

Added to  
File  
A

Handwritten notes in Urdu:  
1. SSRC Meeting  
2. IT subject  
3. ...  
4. ...  
5. ...

Part B 10

(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. Secondary School Teacher (BPS-16)</p> <p>(SST)</p> <p>ف: - P.S</p> <p>Computer Science</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; (سائنسز گروپس) (ہیومنٹیز اور دیگر مساوی گروپس) اور and 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>Computer Science is not present</p>	<p>21 to 35 years.</p> <p>DM</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-1), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3;</p>

(a-f)

Subject  
کامپیوٹر سائنس (IT) کی بجائے

Computer Science is not present

Attached to b-1  
copy of

Ann. B 17

			<p style="text-align: center;">Q</p> <p style="text-align: center;">Qari</p> <p style="text-align: center;">K (PST)</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>(e) three per cent from amongst the Senior Qaris (BPS-15), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3;</p> <p>Provided that if no suitable candidate is available from amongst</p>
--	--	--	---	--

(5)

OFFICE OF THE SECRETARY, GOVERNMENT OF PUNJAB, PATIALA

15/5/2019  
High

Attached to  
Finance Cell

Mr. B. (12)

				<p>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 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</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. 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."</p>
--	--	--	--	--

Allocated do  
From cell  
A



Ann. c (13)

EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. PIII  
GAZETTE

**KHYBER PAKHTUNKHWA**

Published by Authority

PESHAWAR, TUESDAY, 24<sup>th</sup> APRIL, 2018. →

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

**NOTIFICATION**

Peshawar, dated: 24<sup>th</sup> April 2017

No. SO(GT&SE/I-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>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>

امروز شنبه  
میں

صرف ابتدائی

CT  
IT

CT IT Subject  
CT Cadre

نوٹیفکیشن کے لیے مخصوص  
A Hatched No  
Paw Copy

Examining Commission Branch  
Session Council

14

1542 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24<sup>th</sup> APRIL, 2018

<p>2. Secondary School Teacher-Information Technology (SST-IT) (BPS-11)</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>(CT)</p> <p>pa 15</p>	<p>i. At least 2<sup>nd</sup> 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>

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Printed and published by the Manager,  
Slaty. & Ptg. Dept., Khyber Pakhtunkhwa, Peshawar.

Attached to  
to Mr. P. C. Aggarwal

CTC  
altd

Amended (15)

(15)

No	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1	Subject Specialist-Information Technology (ES-17) (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 <sup>nd</sup> Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 <sup>nd</sup> Division from any recognized University.	21-35	a). Fifty percent by promotion on the basis of seniority-competence 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 then 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) (11) (B-06) Govt. High/Higher Secondary Schools	i). Bachelor Degree with the subject of Computer Science at least in 2 <sup>nd</sup> Division or equivalent Qualification from any recognized institution. ii). Bachelor Degree of Education (B. Ed) at least in 2 <sup>nd</sup> Division from any recognized institution.	21-35	a). Fifty percent by promotion on the basis of seniority-competence 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 then by initial recruitment.
3	Junior Teacher-Information Technology (JT-17) (D-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.

(SST)

(SST IT)

IT

Ann. D- 16

TO, THE SECRETARY EDUCATION KHYBER PUKHTOON  
KHYBER PAKHTUNKHWA .

DEPARTMENTAL APPEAL NO OF 2024.

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED  
SERVICE RULES NOTIFICATION DATED 24.7.2014  
WHEREBY NOT INCLUDING THE COMPUTER SCIENCE  
SUBJECT/DEGREE HOLDER IN THE CRITERIA OF  
ELIGIBILITY FOR THE PROMOTION OF PST,S TO THE  
POST OF SST BPS -16 SAME IS AGAINST THE SERVICE  
RULES NOTIFIED IN THE NOTIFICATION DATED 24.4.2018  
TO THE EXTENT OF SERIAL NO.2 COLUMN NO.5 OF THE  
TABLE WHEREBY NO QUOTA HAS BEEN ALLOCATED FOR  
APPELLANT / APPELLANT CADRE AS PST\*IT\* AND SAME  
TIME AWARDED TO ALL OTHERS.

RESPECTFULLY SUBMITTED,

1. That with great respect it is stated that I am performing my  
duty as PST BPS-12. That I am highly educated master degree  
holder in relevant computer science subject along with PST/  
CT, BED / MED degrees etc. I done my duty with full devotion  
and never raised any objection from the student or any other side.  
it is to be noted by your honor that following six cadres of  
SST (BPS -15) are there in which my cadre is PST (IT) which  
is the only and lonely cadre whom, ignored, deprived from the  
promotion rights. That my cadre PST IT, even rules of promotion  
are complete silent which is further question mark before your  
honor? That notification dated 24.7.14 in which specifically  
mentioned the promotion on base of strength of service which  
is 7 years as well as 75% quota, on basis of seniority cum

Ann-D-17

fitness i being full fill all mentioned required above even then I was not awarded promotion. That if I am entitled for appointment on basis of the same qualification while on other side I am not entitled for the promotion while rest is entitled which is great discrimination. That entire five category except PST.IT my cadre computer science not mentioned in rules for promotion.

It is therefore most humbly prayed that on acceptance of this service appeal your honor may graciously be pleased to set aside / declare, null and void / amended / modified the notification dated 24.7.2014 to the extent of the S.NO. 1B Colmn NO. 3 of the table by including / inserting / amending / Modifying service rules as well as service rules 24.2.2018 also may kindly be / inserting / amending / Modifying to the extent of S.NO. 2 column no. 5 and please allocate promotion quota for the appellant, appellant cadre.

It is further requested to consider me for promotion for the post of SST \*IT\* BPS-16 with all back benefit from 2014.

May also awarded the relief to me of 7 years duration of service also.

May please awarded any other relief for which me entitled not specifically mentioned deem appropriate may also awarded.

Dated: 1/4/2021

Abdel  
Appellant

بعدالت

Before the S.T  
K.P.K. Peshawar

Abdur Rauf

Appellant

سید پنجاب  
بنام

vs

Sgt of I.C.P.K. through Chief  
Secretary & others

مورخہ  
مقدمہ  
دعوی  
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی محکمہ  
 آن مقام سسرورس ٹریبونل سکٹارر کیلئے اپیل گورنمنٹ علی گڑھ اور ایڈووکیٹ جنرل  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر حاصل کرنے پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ اور ایڈووکیٹ جنرل کے پاس  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کے طرفہ با اپیل کی برآمدگی  
 اور منسوخی نیز دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا اختیار ہوگا۔ ان کے لئے ضروری  
 مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختاری کوئی کو اپنے ہمراہ یا اپنے ہیجائے  
 تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے  
 اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے  
 سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
 گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

مصرحہ و سسرورس ٹریبونل سکٹارر کے پاس 20 ستمبر 1952ء

الرقوم