

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)

O6.10.2022 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)

Form- A

FORM OF ORDER SHEET

Court of			
	7	77	
Case No		/2021	

	proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/08/2021	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. REGISTRAR
)		This case is entrusted to S. Bench for preliminary hearing to be put up there on $(1/10/2)$.
		CHARMAN
	11.10.2021	Clerk of learned counsel for the appellant present.
		Clerk of learned counsel for the appellant seeks adjournment
	٠ ,	due to General Strike of the Peshawar Bar Association.
		Adjourned. To come up for preliminary hearing before the S.B
		on 14.12.2021.
		af l
		(MIAN MUHAMMAD) MEMBER (E)
	54 ₁	

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 MUHAMMAĎ) MEMBER (E)

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

Reader

23rd 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 shames & gwest.

(Kalim Arshad Khan) Chairman

·06th 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

BEFORE THE SERVICE TRABUNIL K.P.K P	£3HAVA
S. Appeal NO of 2021. 7/7 1. Jamal Nasir S/O Nawab Gul Shango Ka	7/4
Lower.	(Appellant).
VERSUS	
1. Govt of K.P.K through chief secretary	and others
••••••	(Respondents).

Index

		Annexure	Pages
S.NO.	Description		1-5
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2.	Stay application		7- 10
3.	Notification dated 24.7.14	<u>A</u>	11 -1 3
4.	Notification dated 24.7.18	<u> </u>	19-1-5
5.	Departmental Appeal		16
6	Waklat Nama		

Appellant

Through

L.Nawab Ali Noo

Peshawar.

BEFORE THE SERVICE TRABUNIL K.P.K PESHAWAR.

S. Appeal No. of 2021.

1. Jamal Nasir S/O Nawab Gul Shango Kas P/O Tari Temergra Dir Lower.

.....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 TRABUNAL ACT 1974 AGASINST THE IMPUGNED SERVICE RULES NOTIFICATION DATED 24.7.2014 WHEREBY NOT INCLUDING THE COMPUTER SCIENCE SUBJECT/ DEGREE HOLDER IN THE CRTERIA 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 QUOTQ HAS BEEN ALLOCATED FOR APPELLANT CADER 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 NINTY 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.
- 2. That appellant is highly educated hiring master decree holder in their relevant computer science subject along With PST/CT, BED/MED decrees etc.
- 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 complete silent which is further question mark before this honorable count?.
- 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

- 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 \mathcal{B} .

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

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

- 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.

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

Dated:

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, Jamal Nasar S/O Nawab Gul Shago Ks P/O Tari Temergra Dir Lower , 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

BEFORE THE SERVICE TRABUNIL K.P.K PESHAWAR.

S. Appeal No. of 2020.

Shago Ks P/O Tari Temergra 1.Jamal Nasar S/O Nawab Gul Appellant. Dir Lower.

VERSUS

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

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 for.
- 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 Applicant/Appellant

Through

L. Nawab Ali Noor Advocate High Court Peshawar.

AFFIDAVIT.

Shago Ks P/O Tari Temergra Dir I, Jamal Nasar S/O Nawab Gul Lower ,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:







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 Pakhturkhwa 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,-

Serial No. 1 shall be renumbered as 1 B and before Serial No. 1 B, as so renumbered, the following new entries shall be

,	•	tad in T	enective	columi	ıs, namely:	
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Subject Specialist \ i. At least second class Master's Degree or four years BS Degree in the relevant years (BPS-17) subject; and it subject

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

Fifty per cent by promotion, on the basis 23 to 35 (a) 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.

> wore. If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

Anx B CO

against Serial No. 1B, as so renumbered, for the existing entries, the following Shall be substituted, in respective columns, namelu: Secondary School I. At least second class Bachelor 21 to 35 1. Sevenly Five per cent by promotion, on the Teacher (BPS-16) Degree's from a recognized years. basis of seniority-cum-fitness, from the University on need basis from the district concerned in the following manner: following groups with two subject (a) (Chemistry, Botany or Zoology), (a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least (b) (Physics, Maths "A" or "B" or Statistics) five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in (Humanities and other equivalent column No.3: groups at degree level with English as compulsory subject; Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion Bachelor of Education or Master of then the post shall be filled by promotion, Education (Industrial on the basis of seniority-cum-fitness, Business Education) from amongst Certified Teachers, with Education equivalent at least five years service as such and qualifications from a recognized having qualification mentioned in University. column No. 3; (b) four per cent from amongst the Senior Drawing Masters(BPS-1), with at least DM five yours rervice as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3: (3)

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Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion than 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;

(v) three per esat from amongst the Senior Quris (BPS-16), with at least five years service as Senior Quri and Quri and having qualification mentioned in column No.9:

Provided that if no suitable candidate is available from amongst the Senior Caris then the past 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

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Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cumfitness, 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:

If no-suitable-candidate-is-available-inthe relevant cadre of the above teachers, the post falling in their promotion quata shall be filled by initial recruitment

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."

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EXTRAORDIMARY GOVERNMENT



REGISTERED NO!

GAZETTE



KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 24th APRIL, 2018.

GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated: 24th April 2017

No.SO(GTE&SE/1-85/1.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 condit ons 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:

	وسرر	, O	Minimum qualification for appointment	Age	Method of recruitment	
/		Nomenclature of the	by initial recruitment transfer .	limit	5.	
12	[5.No	post		4	a) Fifty percent by promotion on	į
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_	- \//	Information Technology (SS-IT)	Technology of Bachelol Specificos	is	School Teacher-IT with at least	
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	. 32	(81.54.4)	qualification from a recognized		b) Fifty percent by initial	
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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th. APRIL, 2018

				STATE AND THE PARTY OF THE PART
2.	Secondary School Teacher-Information Technology (SST-IT) (BPS-1 i)	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 cquivalent Qualification from a recognized University; and		a). Fifty percent by promotion on the basis of seniority-cumfitness 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.
		ii. Bachelor Dogree in Education (B.Ed) or cquivalent qualification from a recognized University. 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.	•	b). Fifty percent by initial recruitment. Provided that if no suitable candidate is available for promotion, then by initial recruitment.
7	Genified Teacher Information Technology (CT-IT) (BPS-12)	i. At least 2 nd 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	18-35	By initial recruitment.
0	pa'15	ii. Certified Teacher Certificate (CT) or Associate Degree in Education (ADE) from any recognized institution/University		
		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.		

SECRETARY TO GOVERNMENT OF KILYDER PAKIITUNKHWA ELEMENTARY & SEOCNDARY EDUCATION DEPARTMENT

Printed and published by the Manager, Slaty, & Pig. Depti., Khyber Pakhlunkhwa, Peshawar.

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TO, THE SECRETRY EDUCATION, KHYBER PUKHTOON

DEPARTMENTAL APPEAL NO OF 2021. KHWA.

DEPARTMENTAL APPEAL AGASINST THE IMPUGNED SERVICE RULES NOTIFICATION DATED 24.7.2014 WHEREBY NOI INCLUDING THE COMPUTER SCIENCE SUBJECT/ DEGFEE HOLDER IN THE CRTERIA OF ELIGABILITY EOR 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 QUOTQ HAS BEEN ALLOCATED FOR APPELLANT / APPELLANT CADER 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 decree holder in relevant computer science subject along With PST/ CT, BED / MED decrees 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

fitness i being full fill all mentioned required above even was not awarded promotion. That if I am entitled for appointment on basis of the same qualification while en 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 acceptarce 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.: of the table by including / inserting/ amending / Modifying zervice rules as Well as service rules 24.2.2018 also may kindly be / inserting/ wen as Modifying to the extent of S.NO.2 column no.5 and amending / Modifying to the extent of S.NO.2. 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

May please awarded any other relief for which me ertitled not

specifically mentioned deem appropriate may also awarded. also.

Dated: 1 11/2021

