


10.08.2022

Appellant Deposited
Security & Process Fee
12/8

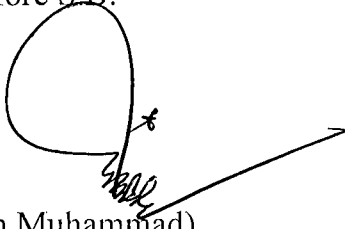
Learned counsel for the appellant present and submitted an application for submission of security and process fee. Application allowed with direction to submit security and process fee within 3 days, thereafter notices be issued to respondents for submission of written reply/comments. To come up for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

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 chance to sign

(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

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7196 /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>2-</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>

7196/2021

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

S. Appeal N O of 2021.

1. Inyat Ullah

.....(Appellant).

VERSUS

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

.....(Respondents).

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Through

Appellant

L.Nawab Ali Noor
Advocate High Court
Peshawar.
03469076945

S. Appeal No. of 2021.

1. Inayat Ullah S/O Ihsan Ulhaq Mohallah Khwja Abad Mingora Swat.

.....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 ELIGIBILITY 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 hiring master decree 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 complete 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

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

6

S. Appeal No. of 2020.

1. Inyat Ullah S/O Ihsanul Haq Mohala Khwja Abad Mingora.

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,, Inyat Ullah S/O Ihsanul Haq Mohala Khwja Abad Mingora, 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



A1174 A. 7
SAD 151

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION SWAT AT GUL KADA

OFFICE ORDER

Consequent upon the meeting of the District Selection Committee held on 21.05.2012, Under the chairmanship of the Executive District Officer Elementary & Secondary Education Swat, the undersigned being competent authority is pleased to issue appointment order of the following candidates against PST (M) vacant posts and posted at the school noted against each in BPS: 07 (Rs. 5800-320-15400) plus usual allowances as due and admissible to them under the Rules except section No.19 of Khyber Pukhtun Khwa Rule 1973 subject to the following terms & conditions.

PST MALE UNION COUNCIL WISE

S.#	NAME OF CANDIDATE	ADDRESS	UNION COUNCIL	School where posted
1	Mr. Mahboob Ali S/o Muhammad Tahir	A Maroof Bama Khel	A Maroof Bama Khel	GPS: Aligay
2	Mr. Amir Hassan S/o Sabir Hussain	A Maroof Bama Khel	A Maroof Bama Khel	GPS: Uzbaka
3	Mr. Sajid Ali S/o Jehan Perviz	A Maroof Bama Khel	A Maroof Bama Khel	GPS: Araq
4	Mr. Mumtaz Ali S/o Muhammad Ali Shah	A Maroof Bama Khel	A Maroof Bama Khel	GMPS: Mariz Gat
5	Mr. Asghar Ali S/o Fazal Hanan	Amankot	Amankot	GPS: No. 1 Faiz Abad
6	Mr. Hazrat Hussain S/o Amir Zaman Khan	Amankot	Amankot	GPS: No. 1 Faiz Abad
7	Mr. Usman Ali S/o Mian Rahim Shah	Arkot	Arkot	GPS: Nalin Gram
8	Mr. Rahmat Ali S/o Saifur Rahman	Arkot	Arkot	GPS: Kandao Gay
9	Mr. Manzoor Illahi S/o Bakht Muhammad	Asharay	Asharay	GPS: Asharay
10	Mr. Sayed Abdul Hai S/o Sayed Abdul Ali	Asharay	Asharay	GPS: Gal
11	Mr. Sahib Zada S/o Jan Zada	Asharay	Asharay	GPS: Pirawday
12	Mr. Anwar Ali S/o Kashmiralay Mian	Asharay	Asharay	GPS: Gal
13	Mr. Anwar Khan S/o Taj Muhammad Khan	Bar Aba Khel	Bar Aba Khel	GPS: No.2 Sersnai
14	Mr. Abdu Salam S/o Muhammad Saeed	Bar Aba Khel	Bar Aba Khel	GPS: Sharif Abad
15	Mr. Abdul Jalil S/o Muhammad Ibrahim	Bar Aba Khel	Bar Aba Khel	GPS: No.2 Sersnai
16	Mr. Hoor Ullah S/o Abdul Qadir	Bar Aba Khel	Bar Aba Khel	GPS: No.1 Sersnai
17	Mr. Salim Iqbal S/o Zahir Gul	Banr Ahengaro Dheri	Banr Ahengaro Dheri	GPS: Tahir Abad
18	Mr. Javed Iqbal S/o Habib Khan	Banr Ahengaro Dheri	Banr Ahengaro Dheri	GPS: Tahir Abad
19	Mr. Akhtar Khan S/o Bakht Karam Khan	Bara Bandai	Bara Bandai	GPS: Qazi Abad
20	Mr. Naqem Ullah S/o Aziz Ullah	Bara Bandai	Bara Bandai	GPS: Qazi Abad
21	Mr. Muhammad Tanveer S/o Muhammad Bazeer Khan	Bahrain	Bahrain	GPS: Areen
22	Mr. Arshad Ali S/o Abdur Rahim	Bahrain	Bahrain	GPS: Satal
23	Mr. Muhammad Kahlid Khan S/o Muhammad Bahadar Khan	Baidara	Baidara	GPS: Bodigram
24	Mr. Rafi ullah S/o Ibrahim	Baidara	Baidara	GPS: Nal
25	Mr. Muhammad Yousaf S/o Zarin	Balakot	Balakot	GPS: Bar Kildan

Annex A 8

134	Mr. Mujtaba S/o Akhtar Munir	Matta Kharerai	Matta Kharerai	GPS: Barei Bama Khel
135	Mr. Rafi Ullah S/o Said Jehan	Matta Kharerai	Matta Kharerai	GPS: Mandla
136	Mr. Amir Alam Khan S/o Muhammad Zar	Madyan	Madyan	GPS: Perday Shah
137	Mr. Abdul Nasir S/o Abdul Wahid	Madyan	Madyan	GPS: Kargay
138	Mr. Fayaz S/o Zia Ur Rahman	Manglor	Manglor	GPS: No.2 Manglor
139	Mr. Zahoor Iqbal S/o Bakht Sherawan	Manglor	Manglor	GPS: No.1 Manglor
140	Mr. Muhamamd Iqbal S/o Khalid	Manglor	Manglor	GPS: Zaran
141	Mr. Fazal Mabood S/o Fazal Qadeem	Miandam	Miandam	GPS: Khair Abad
142	Mr. Fazal Alam S/o Arzo Mand	Miandam	Miandam	GPS: Shongai
143	Mr. Rahim ud din S/o Muhammad Pervize	Miandam	Miandam	GPS: Jukhta
144	Mr. Qaisar Khan S/o Sami Ullah	Nawakalay Shahdara	Nawakalay Shahdara	GPS: Shah Dar
145	Mr. Ziaur Rahman S/o Fazal Rahman	Nawakalay Shahdara	Nawakalay Shahdara	GPS: Shah Dar
146	Mr. Barkat Ullah S/o Sultan Mahmood	Nawakalay Shahdara	Nawakalay Shahdara	GPS: Sera: Abad
147	Mr. Asmat Ali S/o Muhammad	Nawakalay Shahdara	Nawakalay Shahdara	GPS: Seraj Abad
148	Mr. Umar Rahman S/o Tabsher Gul	Nawakalay Shahdara	Nawakalay Shahdara	GPS: Nawakalay
149	Mr. Riaz Ali S/o Sher Zaman Khan	Odigram	Odigram	GPS: Balogram
150	Mr. Said Ahmad S/o Bakht Baidar	Odigram	Odigram	GPS: Balogram
151	Mr. Inayat Ullah S/o Ihsanul Haq	Panr Gulkada	Panr Gulkada	GPS: Gulkada
152	Mr. Naimatullah S/o Toti Khan	Pir Kalay	Pir Kalay	GMPS: Maha Banr
153	Mr. Shaukat Ali S/o Muhammad Rahim	Qalagay	Qalagay	GPS: Pir Pattay
154	Mr. Shakeel Fayaz S/o Masin Zada	Qalagay	Qalagay	GPS: Bakaray
155	Mr. Noman S/o Muhammad Aalam	Qambar	Qambar	GPS: No.2 Qambar
156	Mr. Ahmad Ali S/o Shahbaz Khan	Qambar	Qambar	GPS: Guligram
157	Mr. Imran Khan S/o Muhammad Rahim	Rahim Abad	Rahim Abad	GPS: No.2 Rahim Abad
158	Mr. Imtiaz S/o Gul Faraz	Rahim Abad	Rahim Abad	GPS: No.1 Rahim Abad
159	Mr. Israr Khan S/o Haroon Rashid	Rahim Abad	Rahim Abad	GPS: No.2 Rahim Abad
160	Mr. Fazal Wadood S/o Ainullah	Rang Muhallah	Rang Muhallah	GPS: No.2 Mingora
161	Mr. Wajid Ali S/o Muhammad Zarin	Rang Muhallah	Rang Muhallah	GPS: Akbar Abad
162	Mr. Amin Ullah S/o Bakht Amin Khan	Rang Muhallah	Rang Muhallah	GPS: Patanay
163	Mr. Sahib Zada S/o Sherin Zada	Shah Dherai	Shah Dherai	GPS: Bayan
164	Mr. Ziaur Rahman S/o Qasim Jan	Shah Dherai	Shah Dherai	GPS: Bayan
165	Mr. Naveed Ahmad S/o Fazal Wahab	Saidu Sharif	Saidu Sharif	GPS: Chail Shagai
166	Mr. Umar Farooq S/o Zarin Zada	Saidu Sharif	Saidu Sharif	GPS: Bar: Kargay Saidu Sharif
167	Mr. Afsar Ahmad S/o Naik Muhammad	Sakhra	Sakhra	GPS: Kuz Lalkoo
168	Mr. Ubaidullah S/o Inayatpur Rahman	Sakhra	Sakhra	GMPS: Landai Cham



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Am. B. 7

Peshawar, dated the 24th 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) IT subject	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 MA 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

SSRC Meeting
Subject Specialist
IT subject
BPS-17
23 to 35 years
50% promotion

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
1B	<p>Secondary School Teacher (BPS-16)</p> <p>(35%)</p> <p>21 to 35 years</p> <p>Computer Science is not present</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; (سائنس/انسانیات) and (کمپیوٹر سائنس) 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>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>

Asf
7:- P.S

Handwritten notes in Urdu, including "35%", "21 to 35 years", and "Computer Science is not present".

Subject
کامپیوٹر سائنس
21-35 (17)

Computer Science is not present

Attached to b-9
Copy of

Ann. B (17)

			<p style="text-align: center;">(4)</p> <p style="text-align: center;">Qari</p> <p style="text-align: center;">(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>(a) 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;</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>
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(5)

MSD
High
Attached to
P. Sec. Comy.

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>
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Attended do.
From copy
A

Ann. C-13

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
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(G7/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
			4	5
1	Subject Specialist- Information Technology (SS-IT) (BPS-17)	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 ii. Bachelor Degree in Education (B.Ed) or equivalent 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.	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 b) Fifty percent by initial recruitment. Provided that if no suitable candidate is available for promotion, then by initial recruitment.

امروز شنبه
پش

صرف اطلاع

IT Subject
PST/IT Cadre

نوٹیفکیشن کی مخصوص کمرہ میں لکھی گئی ہے
A Hacked
Prav
Copy

2020

THE INFORMATION IS TO BE KEPT IN CONFIDENCE

Mrs. C-14

2	Secondary School Teacher-Information Technology (SST-IT) (BPS-1)	<p>i. At least Second Class Master's Degree in Computer Science or Information Technology or Bachelor's Degree in Computer Science or Bachelor's Degree (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>	21-35	<p>a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Certified Teacher-II with five years service as such and having the qualification prescribed for the post of Secondary School Teacher-II.</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>
3	Certified Teacher-Information Technology (CT-IT) (BPS-12)	<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>	18-35	By initial recruitment.

Attached to
b. for copy

CTC

Annex - C (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-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 institution.	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 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) (IT) (B-16) Govt. High / Higher Secondary Schools	i). Bachelor Degree with the subject of Computer Science at least in 2 nd Division or 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 then 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.

(SST IT)

(SST IT)

IT

The committee members discussed the proposed amendments in the service rules structure for the SST (C-IT) (B-16) & SST (IT) in depth and were agreed upon unanimously.

Ann. D- 16

TO, THE SECRETARY EDUCATION KHYBER PUKHTOON
KHWANA.

DEPARTMENTAL APPEAL NO OF 2021.

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 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 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: 1/11/2021

[Signature]
Appellant

[Handwritten mark]

Inayatullah

Appellant

2 مخدوم
بنام

VS

مورد
مقدمہ
دعوی
جرم

Govt of K.P.V. through Chief
Secretary & others

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی کے لئے
 آن مقام کے سربراہ نے درخواست کی ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقریر نمائندگی کے واسطے جہاں وہ چاہے وہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کے واسطے ہاویل کی برآمدگی
 اور منسوخی نیز دائر کرنے ہاویل گرانے و نظر خانی و پیروی کرنے کا اختیار ہوگا۔ نیز صورت ضرورت
 مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار کا دعویٰ کرانے ہمراہ یا اپنے بجائے
 تقریر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے
 اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا و در ان مقدمہ میں جو خرچہ ہر جائہ التوا کے مقدمہ کے
 سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو وکیل صاحب پابند ہوں
 گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندرجہ ہے۔

محمد حسین منیر منیر
محمد حسین منیر منیر