

10.08.2022

Security & Process Fee

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

Counsel for the appellant present and seeks adjournment in order to properly assist the court. Adjourned.

To come up for preliminary hearing on 06.07.2022 before S.B.

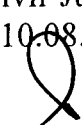
Lost chance is given.


(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.



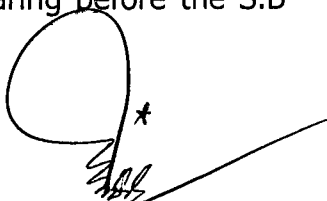

(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7323 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/08/2021	<p>The appeal of Mr. Abdullah 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 at Peshawar. Notice be issued to appellant/counsel 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>f) 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>

Reference your reply submitted in response to our observations, it is reiterated that the objections/observations raised by this office at serial no.1, 2, 3 and 4 have not been removed and still stands. Therefore, the appeal in hand is returned for removing the above mentioned observations and resubmission with 15 days.

No. 1579 /S.T.

Dt. 10/08 /2021.

L.Nawab Ali Noor Adv. Pesh.

REGISTRAR

Respectfully Submitted,
Needfull done kindly put before the Court.

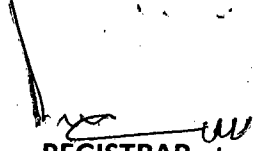
Nawab Ali Noor

The appeal of Mr. Abdullah son of Sarzamen Khan GPS-1 Dewana Baba Buner received today i.e. on 09.07.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Appeal has not been flagged/marked with annexures marks.
- ② Annexures of the appeal may be attested.
- ③ There are interruption between the heading and facts of the appeal, continuity be maintained in the memo of appeal.
- ④ One copy/set of the appeal for 2nd Member be submitted in file cover.
- 5- Check list is not attached.
- 6- Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter in this Tribunal.

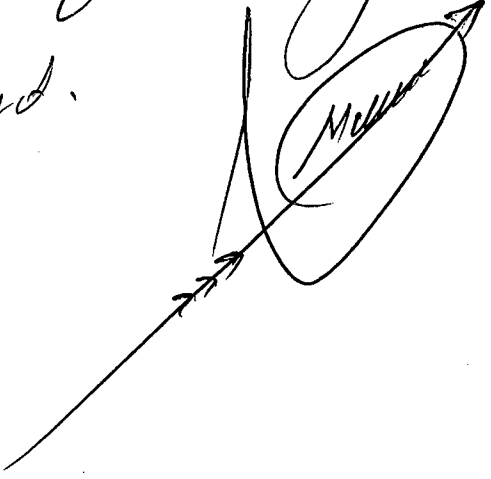
No. 1224 /S.T,

Dt. 12/07 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Nawab Ali Noor Adv. Pesh.

*Respectfully submitted;
needfull done kindly put before the
Cand.*



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

3

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 B.**

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 C.

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 D.

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 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, Abdullah S/O R/O Sar amin GPS-1 Dewana Baba Buner , 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

Abdul
2014

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

6

S. Appeal No. of 2020.

1. Abdullah S/O R/O Sar amin GPS-1 Dewana Baba Buner.
..... 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

Ali Noor
Applicant / Appellant

Through

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

AFFIDAVIT.

I, Abdullah S/O R/O Sar amin GPS-1 Dewana Baba Buner, do solemnly affirm and declare on oath that the contents of the accompanying

Abdullah
4-7-21

Ali Noor



Ann A 7

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510468
EMAIL: edobuner@gmail.com



APPOINTMENT ORDER:

Consequent upon recommendations of the Departmental Selection Committee, appointment of the following candidates is hereby ordered as PST purely on merit against the vacant posts on adhoc **school based** one year contract in BPS-12 (13320/-960/-42120/-) fixed plus usual allowance as admissible to them under the Rules and existing policy of the Provincial Government in Teaching Cadre on the terms and conditions given below with effect from the date of taking over charge in the interest of public service.

Disable @ 2% Quota

S. No.	Roll No	Name of Candidate	Father's Name	CNIC	D.O.B	Score	School Where appointed	Remarks
1	1419000512	AZAM ALI SHAH	MOHAMMADI SHAH	15102-0355025-3	10/08/1995	100.68	GPS Gagra	
2	1419000904	HAYAT HUSSAIN	HUKAM SHER	15102-0350580-1	25/08/1994	99.89	GPS Kolkay	
3	1420000015	MUHAMMAD AYAZ	PARWARASH KHAN	15101-5200330-3	15/11/1993	99.81	GPS Charorai	
4	1418000465	FAROOQ SAEED	SAMI UL HAQ	15101-2906834-1	01/05/1991	97.31	GPS Elai	
5	1421000190	IMRAN	BAKHT NAZIR	15101-6055176-7	15/03/1996	94.78	GPS Mulayousaf	
6	1422000838	BAKHTYAR ALI	TAZA GUL	15101-3916637-9	12/01/1992	94.14	GPS Bajkala	
7	1422000186	BAKHTI AFSAR	NOWSHER KHAN	15101-9935902-5	12/04/1991	93.47	GPS Sura No.1	
8	1419000676	FAZAL IBRAR	BORHAN	15101-1869606-9	11/03/1992	88.75	GPS Torwaarsak No.1	
9	1422000821	SUBHAN-ULLAH	AMIR WAHAB	15101-9391887-9	09/07/1989	88.19	GPS Beshnai	
10	1419000109	NAJIB ULLAH	AMIR ZAMAN KHAN	15101-2815119-9	13/04/1990	84.94	GPS Kingargalai	
11	1418000522	LATEEF KHAN	NOOR-UL AMIN	15102-0340159-7	01/02/1990	83.22	GPS Hasa Khel Cheera	

Minority @ 3% Quota

S. No.	Roll No	Name of Candidate	Father's Name	CNIC	D.O.B	Score	School Where appointed	Remarks
1	1421000837	BALJEET KUMAR	NANAK CHAND	15101-6408604-9	10/03/1992	117.87	GPS Cheera	
2	1422000803	MANINDAR KUMAR	RAMANTH	15101-3057600-3	10/02/1993	92.40	GPS Gadezi	
3	3120000116	GAGAN PREET SINGH	PRETUM LAL	15103-0349388-3	27/03/1996	81.94	GPS Ghurghushlo	
4	1422000183	JAYDEEP	SOBASH	15101-4480697-9	12/04/1984	72.26	GPS Amnawar No.1	

S. No.	Roll No.	Name of Candidate	Father's Name	CNIC	D.O.B	Score	School Appoint
U/C ABAKHAIL							
1	142000680	NASIB ULLAH	RAZIM KHAN	15101-8345173-7	20/03/1990	137.15	GPS Kingargali
2	141800070	JAVED RAHMAN	SHAH RAZA KHAN	15101-1405168-3	05/03/1986	131.28	GPS Kingargali
3	2921001769	ABDUL HAKIM	HAMID ULLAH	15101-8538277-3	12/03/1992	129.18	GPS Gararai Dara
4	1421000285	SYED WAHID	FAZAL GHAFOOR	15101-2894210-1	05/02/1994	127.19	GPS Bazargai
5	1421000370	WAJID RAHMAN	MAQBALI KHAN	42000-8398349-5	15/01/1992	127.10	GPS Bazargai
6	1421000962	ABDULLAH	MARIN DAD	15101-9174291-5	02/04/1984	124.98	GPS Kingargali
7	1422000566	INAM UR RAHMAN	ATTA UR RAHMAN	15101-0185265-5	27/04/1993	124.15	GPS Bampokha
8	1421000928	AMANE MULK	MUHAMMAD ALI JAN	15101-4138418-9	10/03/1990	123.02	GPS Nansir
9	1418000512	ABDUL WAHAB	GUL DASH	15101-8349406-9	05/04/1992	121.83	GPS Gararai
10	1420000167	ZAI UR RAHMAN	RAHIM RAZA	15101-5331888-5	07/03/1993	120.77	GPS Gararai Dara
11	1418000148	ABDUL WALI KHAN	YAQUB KHAN	15101-8432903-1	18/03/1989	119.00	GPS Gararai
12	1418000795	KARIM GUL	ALI MUHAMMAD KHAN	15101-1488570-7	30/03/1991	117.93	GPS Bampokha
13	1422000293	JMRAN KHAN	MUHAMMAD SHOAB	15101-6719102-9	01/05/1990	117.83	GPS Kohy
14	1421000931	IBRAR ALI	ABDUL QAYUM KHAN	15101-6494159-1	01/04/1990	117.07	GPS Bampokha
15	1422000369	SYED MALOOK	TAJMALOOK	15101-6690498-5	17/03/1993	115.78	GPS Nansir
16	1422001086	WAQAR UL MULK	AMIR GHANI	15101-4071601-7	20/03/1990	114.66	GPS Kohy
17	1422000981	ZAKIR KHAN	SAUD KHAN	15101-5715402-1	01/03/1993	114.45	GPS Nansir
18	1421000579	SYED RASHAD	SHEIKH SYED	15101-1771109-5	03/04/1990	113.57	GPS Sarbanda
19	1421000582	ISRAR AHMAD	BAKHTI ZADA	15101-4923798-3	14/03/1989	112.83	GPS Bazargai
U/C DAGGAR							
1	1420000773	KHAD MEEN	ALI HAIDAR	15101-4098653-9	01/04/1991	138.10	GPS DAGGAR NO-2
2	1421000097	ATIQ UR RAHMAN	SIRAJ KHAN	15101-2947846-7	02/04/1993	132.24	GPS HISAR
3	1420000961	IHSAN ELAHI ZAHEER	ABDUS SALAM	15101-9370469-9	28/03/1993	131.89	GPS HISAR
4	1420000899	SHAFI UR RAHMAN	SHAMS UR RAHMAN	15101-5743091-3	11/12/1988	129.58	GPS HISAR
5	1418000496	MUHAMMAD YUNAS	ZARSHAD KHAN	15101-8744307-9	10/03/1991	128.78	GPS KALPANI DAGGAR
6	1420000415	ASHFAQ AHMAD	FAZAL AHMAD	15101-7380522-3	20/01/1995	128.52	GPS KHAIL
7	1420000245	BAKHTI RASHAD	PIR DAD SHAH	15101-8786060-3	15/05/1994	127.09	GPS BAR HISAR

Case A 8

10	1420000455	LIAQAT NABI	YAFSAL KHAN	15101-0361948-5	10/10/1980	98.90	GPS BAR SHAMNAL
11	1418000384	BAKHT SUBHAN	SHAPAR	15101-1373803-5	05/06/1979	96.95	GPS BUDAL MAIRA
12	1420000051	GUL ZAMAN	SAID AKBAR KHAN	15101-2334706-1	27/10/1990	96.38	GPS BUDAL MAIRA
13	1419000477	MUHAMMAD SALIM	AKBAR KHAN	15101-5520527-7	06/02/1990	95.35	GPS PUKHTANO MAIRA
14	1419000655	SAID BAR KHAN	SAID AKBAR KHAN	15102-0339836-5	11/04/1993	95.08	GPS ALAGRAM
15	1420000575	FASIH UL LISAN	SAIF UR RAHMAN	15101-6321882-1	02/04/1992	93.99	GPS BELA
16	3418000055	MUHAMMAD HUSSAIN	MUSHTARAN	15101-0443969-9	06/03/1991	92.89	GPS MIRZA SAR
17	1420000366	LAL MUHAMMAD	FAIZ TALAB	42401-8526286-9	15/06/1988	92.80	GPS ANAK
18	1421000471	MUHAMMAD ABBAS KHAN	UMBARAS KHAN	15102-0349236-1	08/04/1994	91.36	GPS MOTA KHAN DARA
19	1422000909	TAJMAL	ISMAIL	15101-8777824-5	03/01/1988	91.14	GPS BUDAL MAIRA
20	1422000642	LAIQ ZADA	GUL ZADA	15101-7898714-3	23/03/1992	90.39	GPS PANGHALI
21	1422000051	SAJJAD	ABDUL SAID KHAN	15102-0354746-1	20/04/1994	89.60	GPS DHELAI
22	1418000358	ABDUS SAMAD	HAKIM JAN	42101-0258145-3	06/03/1989	86.23	GPS PANGHALI
23	1420000443	INAYAT ULLAH	HAMID ULLAH	15101-6277180-9	12/06/1987	85.95	GPS BAR SHAMNAL
24	1419000743	MUHAMMAD FAROOQ	LAJBAR	15101-5674469-9	28/03/1988	85.77	GPS DHELAI
25	1422000846	NASIB RAHMAN	ABDUL ZAHIR	15102-0349402-9	20/08/1991	85.63	GPS KARA

U/C DIWANA BABA

1	1422000656	ZIA UD DIN	WASAL DIN	15101-2720984-7	14/02/1989	131.85	GPS DAND MAIRA
2	1420000646	HIMMAT ALI	SIRAJ KHAN	15101-1834825-9	01/01/1992	130.88	GPS KULYARI
3	1420000514	HAZ AHMAD	SAEED AHMAD	15101-1061698-9	03/12/1990	128.29	GPS DEWANA BABA NO 2
4	1419000773	SHAH FAISAL	AMAIZ KHAN	15101-8700527-1	12/01/1990	127.22	GPS KULYARI
5	1420000495	FAZLI WAHID	FAZAL KARIM	15101-3546852-1	15/03/1991	126.86	GPS KULYARI
6	1420000099	ABDULLAH	JAMSHID KHAN	15101-0320084-5	06/03/1985	126.28	GPS MATWANI
7	1421000988	AFTAB ALI	MUHAMMAD GHAFOR	15101-5711709-5	31/12/1989	125.50	GPS DEWANA BABA NO 1
8	1421000888	ISMAEEL SHAH	RAHIM DAO SHAH	15101-6441101-7	19/11/1989	122.29	GPS YAKH DARA
9	1420000857	NASIR KHAN	SHAMSHER	15101-7422287-1	05/01/1991	119.96	GPS KHAISTA BABA
10	1420000169	HAZLEAMIN	MUHAMMAD ZAMIN	15102-0343031-7	10/03/1991	119.59	GPS YAKH DARA
11	1422000967	ABDULLAH	SARZAMIN	35202-8904898-5	08/05/1993	119.58	GPS DEWANA BABA NO.1
12	1420000464	SYED ZAMIN SHAH	SARDAR ALI	15101-2551938-3	13/02/1990	119.36	GPS KOTKAY

13	2922001073	MUHAMMAD SHAHZAD	ALAM ZEB	15102-0343872-1	12/02/1994	119.15	GPS
14	1420000717	SHEHZAD	MUNIR KHAN	15103-0341664-7	15/03/1992	119.11	GPS KOTKA
15	1420000704	SAIDUL HAQ	ABDUL MOMIN	15102-0350211-1	10/06/1994	114.85	GPS DEWANA BABA NO 1
16	1421000204	ISTIQBAL	KISHWAR KHAN	15102-0345062-5	04/04/1993	114.44	GPS KOTKAY
17	1421000127	MUHAMMAD ARIF	SHAMS UL HADI	15101-6824126-7	27/03/1991	113.12	GPS DAND MAIRA
18	1420000503	OBAID UR RAHMAN	FAZAL RAHMAN	15101-0425196-9	03/04/1991	113.03	GPS ARGA
19	1420000772	SIR BAZ KHAN	KHAN JAN	15101-6334815-5	22/02/1991	112.66	GPS TOOT BANR
20	1421000805	ARAF SHAH	TAJMAN SHAH	15101-9014550-3	01/04/1988	110.74	GPS DAND MAIRA

UIC GAGRA

1	1418000192	ANSAR ALI KHAN	RISHAD	15102-0344486-9	27/02/1994	132.46	GPS GAGRA
2	1418000500	SANA UR RAHMAN	MUHAMMAD QASIM	15101-0891788-1	21/04/1991	129.16	GPS SURKAMAR
3	1419000567	FAKHRE ALAM	SHER MUHAMMAD KHAN	15101-2545247-1	21/07/1990	128.10	GPS BAJKATA
4	1419000757	ANWAR	NOOR ZADA KHAN	15101-2138785-1	01/03/1985	126.79	GPS SURKAMAR
5	1420001011	FAZAL WAHID	MAUJOOD KHAN	15101-0701080-3	01/04/1990	125.92	GPS GAGRA
6	1420000191	ABID ALI	MASKIN	15102-0345371-1	11/04/1994	125.11	GPS GAGRA
7	1419000629	ABID RAHIM	GUL RAHIM	15102-0354686-9	01/03/1996	123.34	GPS BAJKATA
8	1418000247	FAZAL WAHID	ABU SAEED	15101-1930812-3	01/04/1990	122.73	GPS KALPANI
9	1418000366	SAJJAD UR RAHMAN	SAID BAKHTAJ	15102-0348820-9	10/03/1995	121.12	GPS MAIZARAY
10	1418000509	AMIR AFZAL KHAN	NOOR RAHMAN	15102-0344831-7	02/04/1994	120.99	GPS KALPANI
11	1422000257	AMIR AHMAD	DIAR SHAH	15102-0343967-5	01/05/1993	120.83	GPS MANJAR
12	1421000477	MUHAMMAD ABAS	BAHROZ KHAN	15101-3262199-7	21/03/1992	120.28	GPS BIAMDARA
13	1422001064	SHAHEEN	SHAH MASKEEN KHAN	15101-3086167-3	01/01/1990	119.98	GPS MANJAR
14	2920003668	ANWAR ZAMAN	SAID RASAN	15102-0342826-5	11/09/1993	119.10	GPS BIAMDARA
15	1422000900	FIDA MUHAMMAD KHAN	MUHAMMAD ANWAR	15102-0346678-1	02/04/1994	118.23	GPS MARVEZ ABAD
16	1421000592	BAHAR ALI KHAN	ABDUL SATAR	15101-4588018-9	10/01/1990	117.59	GPS BAJKATA
17	1421000387	AMJAD ALI	BAKHT RAWAN	15101-5749728-3	18/01/1992	117.49	GPS SURKAMAR
18	1419001047	ARSHAD ALI	KHAN ZADA	15102-0338999-1	02/04/1993	117.10	GPS MARVEZ ABAD
19	3218001979	AMIR ALAM	SHER ABDULLAH	15101-4016327-7	01/04/1989	116.27	GPS SURKAMAR
20	1420000128	MUZAMIL SHAH	MUKHMIL SHAH	15101-5405707-7	02/03/1991	115.84	GPS BABA JEE BAJKATA

Ann. B9



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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) <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

Handwritten notes in Urdu:
کے لئے
SSRC کے لئے
مقررہ
مقررہ
مقررہ

Handwritten notes: Attached to File A

Mr B 10

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

3/16

1	2	3	4	5
"1B.	<p>Secondary School Teacher (BPS-16)</p> <p>(SST)</p> <p>دوسری ثانوی اسکول ٹیچر (BPS-16)</p> <p>سائنس (SST)</p> <p>کامپیوٹر سائنس</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),</p> <p>Or</p> <p>(b) (Physics, Maths "A" or "B" or Statistics)</p> <p>Or</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>(سائنس) (ہنریات)</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>Computer Science is not present</p>	<p>21 to 35 years.</p> <p>CT</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>

as f

f:- P.S

Subject

کامپیوٹر سائنس

Computer Science

CT - PST (IT)

Attached to be J
copy of

Ann. B (17)

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

(5)

H.S.F. P. High

Attached to
Finance Com.

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>
--	--	--	--	---

Approved do
J. M. C. S.
A

Ann. C-13

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. III

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/LT/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 (1) 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)	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

اس میں
میں

CT
IT

CT
IT

CT
IT
Subject
CT
cadre

نوٹیفکیشن کے لیے مخصوص کمرے میں آئیے
Peshawar
Date
Copy

Pr. C-14

1542 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th APRIL, 2018

2.	Secondary School Teacher-Information Technology (SST-IT) (BPS-11)	<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>	21-35	<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>
1.	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.

CTI

pa 15

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Printed and published by the Manager,
 Staty. & Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar.

CTI
 eltd

Attached to
 to Mr. P. J. J. J.
 [Signature]

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 (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-eminence 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-eminence 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 (J-T-IT) (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.

(SS-IT)

(SST/IT)

IT

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

Signature and stamp area with handwritten initials.

Ann. D- 16

TO, THE SECRETARY EDUCATION KHYBER PUKHTOON
KHWA.

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
ELIGABILITY 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

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: 11/4/2021

Appellant

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

Appellant

2 مخدوم
بنام

Abdullah
vs

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

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ

محکمہ سیکرٹریٹ

آن مقام سیکرٹریٹ میں سید علی احمد کیلئے ایڈولٹ گورنمنٹ کے لئے ایک نوٹس جاری کیا گیا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر کرنے پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور دعویٰ اور درخواست ہر قسم کی تصدیق و زرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کے لئے ہر قسم کی برآمدگی اور مفسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اگر ضرورت ہو تو مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ 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۔

سید علی احمد

Handwritten signature and scribble

مختار سیکرٹریٹ میں سید علی احمد کیلئے ایڈولٹ گورنمنٹ کے لئے ایک نوٹس جاری کیا گیا ہے۔