


10.08.2022

Applicant deposited
Security & Process Fee

10/8

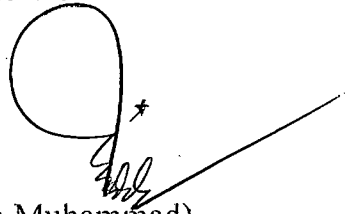
Learned counsel for the appellant present and submitted an application for submission of security and process fee. Application allowed with direction to submit security and process fee within 3 days, thereafter notices be issued to respondents for submission of written reply/comments. To come up for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

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 is given.*


(Kalim Arshad Khan)
Chairman

06th July, 2022

Learned counsel for the appellant present.

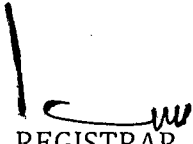

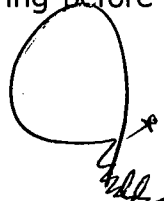
Learned counsel says that appeals against the same order, filed by other appellants have already been admitted and are fixed for 10.08.2022. Therefore, this appeal is also admitted to full hearing, subject to all just and legal objections by the other side. The appellant is directed to deposit security 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 OF ORDER SHEET

Court of _____

Case No.- 7152 /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> |

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

S. Appeal N O of 2021.

1. Irfan Ullah .

2152/21

.....(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

S. Appeal No. of 2021.

1. Irfan Ullah S/O Ihsan Ullah Mohallah Bunrr 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.

~~(Copies of the testimonials 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

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 D.

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 G.

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 appellatnt entitled not specifically mentioned deem appropriate may also awarded.

Dated:

Through



Appellant
L.Nawab Ali Noor
Advocate High Court
Peshawar.

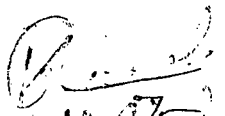
Certificate: certified that no such like service. appeal filed before this Honorable tribunal.

L.Nawab Ali Noor
Advocate High Court
Peshawar.

AFFIDAVIT.

I, Irfan Ullah S/O Ihsan Ullah Mohalla Bunrr 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


4-9-21

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

6

S. Appeal No. of 2020.

1.Irfan Ullah S/O Ihsan Ullah Mohalla Bunrr Mingora Swat.
..... 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 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

Through

[Signature]
Applicant/Appellant

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

AFFIDAVIT.

I, Irfan Ullah S/O Ihsan Ullah Mohalla Bunrr Mingora Swat ,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.

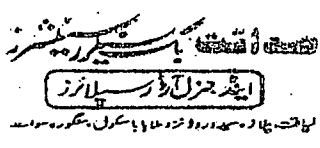
[Signature]
Deponent

[Signature]
4/7/21

Ann A. G

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION SWAT

Phone No. 0946-9240228-209

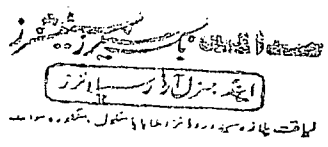


ORDER

In pursuance of the meeting of the District Selection Committee held on 28.05.2011, the Executive District Officer Elementary & Secondary Education Swat being competent authority is pleased to order the appointment of the following candidates against PST vacant posts at the School noted against their names in BPS:09 Rs. 3820-230-10730/ plus usual allowances as admissible under the rules except section 19 of Khyber Pukhtun Khwa Rule 1973 with effect from the date of their taking over charge subject to the following terms and conditions given below:

PST MALE UNION COUNCIL WISE

| | | | | | | |
|----|---|---------------|------------|-------|-----------------|----------------------|
| 1 | Syed Bahar Alam Shah S/o Syed Fazal Karim | Banjot | 17.04.1988 | 63.21 | U/C A.M.Bekhel | GPS Achar No. I |
| 2 | Muhammad Farooq S/o Said Muhammad | Sar Sardaray. | 01.03.1984 | 61.81 | U/C A.M.Bekhel | GPS Uzbaka |
| 3 | Nasar Hussain S/o Fazal Rahim | Bjakand | 01.03.1989 | 62.73 | U/C Arkot | GPS Shpilai |
| 4 | Hazrat Ali S/o Mamber | Sharo | 25.03.1986 | 62.27 | U/C Arkot | GPS Ochrai |
| 5 | Murad Ali S/o Moamber Khan | Kala Kot | 10.04.1985 | 62.25 | U/c Asharay | GPS Piraodai |
| 6 | Naved Ahmad S/o Nisar Ahmad | Bahrain | 12.04.1989 | 56.84 | U/C Bahrain | GPS Kulbanr |
| 7 | Mujecebur Rahman S/o Mirajud Din | Bahrain | 12.08.1986 | 56.59 | U/C Bahrain | GPS Kuz Alar |
| 8 | Muhammad Ismail S/o Shah Masin Khan | Baidara | 06.04.1987 | 60.52 | U/C Baidara | GPS Gharib Abad |
| 9 | Imran Khan S/o Bakht Baidar Khan | Baidara | 10.11.1983 | 59.18 | U/C Baidara | GPS Bijawra |
| 10 | Akhtar Hameed S/o Akhtar Munir | Kidam | 01.09.1988 | 61.47 | U/c Balakot | GPS Katil Ramait |
| 11 | Imtiaz Ahmad S/o Fazal Wadood | Bara Bandai | 18.05.1988 | 60.29 | U/C Bara Bandai | GPS Malooka ✓ |
| 12 | Fazal Hayat S/o Bacha Zada Khan | Tangar | 02.03.1987 | 61.17 | U/C Barthana | GPS Gamsir No. I |
| 13 | Taj Muhammad Khan S/o Fahim Gul | Bashigram | 01.03.1990 | 63.20 | U/C Bashigram | GPS Shinkoo |
| 14 | Umar Farooq S/o Nawshirawan | Beshigram | 14.01.1989 | 62.80 | U/C Bashigram | GPS Shalkyar |
| 15 | Muhammad Sadiq S/o Wahid Zaman | Biha | 03.04.1989 | 62.60 | U/C Biha | GPS Qila Fazil Banda |
| 16 | Muhammad Anjum S/o Muhammad Zahid | Labat | 20.12.1988 | 61.83 | U/C Biha | GPS Barabro |
| 17 | Samiullah S/o Tajim Khan | Chuprial | 01.12.1989 | 61.93 | U/C Chuprial | GPS Gujrabaur |
| 18 | Noor Ali S/o Hadi Khan | Kamalay | 20.01.1986 | 60.48 | U/C Chuprial | GPS Kamalay |



| | | | | | | |
|----|--------------------------------------|---------------|------------|-------|---------------------|--------------------|
| 19 | Nisar Ahmad S/o Fazal Rahman | Sangota | 06.01.1981 | 58.45 | U/C Dangram | GPS Sabonny |
| 20 | Shah Faisal S/o Noor ul Hadi | Rahat kot | 02.09.1985 | 60.42 | U/C Darmai | GPS Hakinabad |
| 21 | Sayed Jamal Shah S/o Mian Rahim Jan | Ragstoon | 01.01.1989 | 60.28 | U/C Darmai | GPS Ragstoon |
| 22 | Abdul Kabir S/o Abdul Rauf | Azad Banda | 01.05.1986 | 60.15 | U/C Darmai | GPS Kot Darmai |
| 23 | Amjad Ali S/o Fazal Wadood | B.D.Khela | 12.01.1983 | 63.26 | U/C B.D.Khela | GPS Mandaur |
| 24 | Kor Wadan S/o Musafar | K.D.Khela | 04.04.1984 | 62.84 | U/C B.D.khela | GPS Bazkhela No.1 |
| 25 | Fazal Amin S/o Muhammad Aleem | D.khela | 07.03.1987 | 61.06 | U/C B.D.Khela | GPS Bazkhela No.2 |
| 26 | Nisar Ahmad S/o Khaista Muhammad | Fatehpur | 07.12.1982 | 61.53 | U/C Fatehpur | GPS Baban |
| 27 | Allaud Din S/o Akhtar Munir | Fatchpur | 01.01.1989 | 60.81 | U/C Fatehpur | GPS Baban |
| 28 | Anwar Ali S/o Muhammad Rashad | Gulibagh | 15.03.1982 | 62.68 | U/C Gulibagh | GMPS Bagla |
| 29 | Shafiullah S/o Pashmin | Dagay | 04.04.1987 | 60.30 | U/C Gwaterai | GPS Awarai Gat |
| 30 | Hameedur Rahman S/o Amir Hatam | Roringar | 03.03.1986 | 59.94 | U/C Gwaterai | GPS Muradai |
| 31 | Habib Shah S/o Muhammad Ishaq | Hazara | 11.01.1981 | 60.81 | U/C Hazara | GPS Shaikloo |
| 32 | Noor Zada S/o Muhammad Faqir | Ashoran | 13.03.1987 | 62.83 | U/C Kalam | GPS Batandar kalam |
| 33 | Fazal Rahim S/o Janas Khan | Ushoo | 20.04.1982 | 62.43 | U/C Kalam | GPS Matitan |
| 34 | Muhamamd Jamil S/o Bakht Zada | Kanju | 06.06.1986 | 62.91 | U/C Kanju | GMPS Gulonshah |
| 35 | Sajad Ali S/o Mian Raham Dil | Khwaiz Khela | 06.03.1987 | 61.06 | U/C Khwaiz Khela | GPS BandaiMaira |
| 36 | Masoodur Rahman S/o Ali Rahman | Tikhooni | 15.03.1983 | 60.93 | U/C Khwaiz Khela | GPS Bandai |
| 37 | Mian Said Bacha S/o Mian Said Bashar | Serai | 16.04.1988 | 58.16 | U/C Kishavru | GPS Sordairai |
| 38 | Ahmad Hussain S/o Sahib Zada | Kokarui | 08.01.1987 | 59.37 | U/C Kokarui | GPS Bar Baligram |
| 39 | Muhammad Ilyas S/o Sultanat Khan | Kokarui | 30.04.1988 | 57.30 | U/C Kokarui | GPS Kuz Gishar |
| 40 | Mumtaz Ali Khan S/o Abdul Ahad | k. Bnadai | 01.08.1989 | 62.27 | U/C Koza Bandai | GPS Lalo Banda |
| 41 | Noorul Amin S/o Noorul Ahad | Madyan | 11.01.1986 | 61.04 | U/C Madyan | GPS Bar Bangish |
| 42 | Fazal Ghafar S/o Shah Furhad | Madyan | 05.05.1987 | 57.80 | U/C Madyan | GPS Kunda |
| 43 | Mahboob Sani S/o Husan Sani | Malokk Abad | 25.05.1985 | 59.36 | U/C Malokk Abad | GMPS Noorullah |
| 44 | Usman Ali S/o Samandar | Darolai | 13.12.1986 | 62.14 | U/C Mankeyal | GPS Zarinal |
| 45 | Ali Akbar S/o Muhammad Toti | Didpanai | 31.03.1981 | 62.26 | U/C Matta Kahrerai | GPS Churlaka |
| 46 | Hamidullah S/o Ghulam Habib | Totakay | 24.10.1990 | 61.45 | U/C Matta Kahrerai | GPS Ditpanai |
| 47 | Muhammad Alamgir S/o Hazrat Umar | Sinpora | 30-3-1977 | 59.96 | U/C Matta Kahrerai | GPS Mandoor |
| 48 | Aurang Zeb S/o Fazal Khaliq | Nawakalay (M) | 07.04.1984 | 61.99 | U/C N. K. Shah Dara | GPS Sirjabad |
| 49 | Barkat Ali S/o Shah Kamin Khan | Pir Kalay | 26.02.1984 | 60.10 | U/C Pir Kalay | GMPS Qaziabad |

Mr A-8

| | | | | | |
|----------|--------------------------------------|-------------------|------------|-------|-------------------------|
| 18/175 | Njaeebullah S/o Ihsanullah | Banar | 01.04.1987 | 67.19 | GPS Saidarabala |
| 19/467 | Shakirullah S/o Muhammad Jan | Dandanai | 03.01.1989 | 67.11 | GPS Dandanai |
| 20/1616 | Izat sher S/o Muhammad | Khwaza Khela | 02.02.1985 | 67.03 | GPS Birami |
| 21/425 | Sultan Ali S/o Habibur Rahim | Udigram | 10.01.1984 | 66.91 | GPS Balogram |
| 22/476 | Farid Ahmad S/o Chanary | Madyan | 01.04.1985 | 66.89 | GPS Lalshish Balnkot |
| 23/341 | Javid Ashraf S/o Shah Rawan | Shalpin | 01.06.1987 | 66.86 | GPS Sheryay |
| 24/754 | Noour Ullah S/o Muhammad Zeb | Kalakot | 10.02.1987 | 66.75 | GPS Pirabad |
| 25/40 | Noor Ul Wahab S/o Shamsul Wahab | Totano Bnadai | 22.06.1988 | 66.67 | GMPS Danda |
| 26/29 | Aurang Zeb S/o Shahinshah | Kabal | 03.03.1980 | 66.66 | GMPS Tanchai |
| 27/305 | Rahman Hadi S/o Fazal Rahim | Hazara | 08.06.1989 | 66.57 | GPS Qamboe |
| 28/649 | Shahid Khan S/o Muhammad Shah Khan | Tindodag | 03.03.1986 | 66.43 | GPS Gogdara |
| 29/1400 | Saeddullah Khan S/o Ashnagaray | Jehan Abad | 15.01.1986 | 66.38 | GMPS Mainz Gat |
| 30/08 | Syed Jehan Shah S/o Muhammad Kamal | Mashkomai | 01.04.1977 | 66.30 | GPS Topsin |
| 31/981 | Fazal Sher S/o Sherin Zada | Nawakalay | 04.02.1987 | 66.16 | GPS Sangrai |
| 32/420 | Mushtaq Ahmad S/o Shakeel Ahmad | Udigram | 01.09.1985 | 66.11 | GPS Samsuray |
| 33/1570 | Muhamamd Shafiq S/o Karwanay | Deolai | 03.04.1979 | 66.08 | GPS Bala Deolai |
| 34/1266 | Attaullah Shah S/o Inyatullah | Kanjur | 01.04.1976 | 66.06 | GPS Damgahr No.2 |
| 35/431 | Habib Ali Khan S/o Shamsher Khan | Chulyar | 01.03.1984 | 65.99 | GPS Manpitni |
| 36/969 | Arshad Iqbal S/o Ruhul Amin | Chuil Shagii | 02.04.1978 | 65.93 | GPS Kadona |
| 37/269 | Amjad Ali S/o Khurshid Khan | Chupriyal | 13.03.1984 | 65.78 | GPS Chungai |
| 38/803 | Fida Ullah Khan S/o Ahmad Jehan Khan | Seer | 11.02.1986 | 65.68 | GPS Khwarpatari |
| 39/790 | Noorul Ahad Mian S/o Mian Muhammad | Serai | 05.03.1986 | 65.68 | GPS Bar Jabar |
| 40/1035 | Muhamamd Asad Sardar s/o Sardar Ali | Panr | 02.08.1983 | 65.59 | GPS Sabonay |
| 41/1365 | Bakht Nacem Khan S/o Bakht Mandyar | Morpandai | 01.01.1978 | 65.55 | GPS Pardishah |
| 42/1867 | Arsabd Ali S/o Sultani Rom | Chamtaali | 25.04.1986 | 65.53 | GPS Urdam |
| 43/117 | Abbas Ali S/o Fazal Wadood | B.D.Khela | 09.02.1980 | 65.50 | GPS Bara Durashkhela |
| 44/766 | Bahadar Khan S/o Tota khan | Bar Shawar | 20.02.1987 | 65.36 | GPS Onar (Waina) |
| 45/176 ✓ | Irfanullah S/o Ihsanullah | Banr | 04.06.1985 | 65.31 | GMPS Amir Khan |
| 46/1777 | Nisar Ahmad S/o Khalid Khan | Toatano Bandai | 15.02.1976 | 65.23 | GPS Soray Sharifay |
| 47/1302 | Ikramul Haq S/o Hussnul Maab | Shin | 01.11.1989 | 65.21 | GPS Sangrai |
| 48/426 | Liaqat Ali S/o Muhamamd Jan | Sharif Abad | 05.01.1979 | 65.18 | GPS Patanai |
| 49/888 | Rahmat Ali S/o Muhamamad Ibrahim | Ningolai | 10.01.1988 | 65.10 | GPS Pirkalay |

| | | | | | | |
|----|---------------------------------------|---------------|------------|-------|-------------------|---------------------|
| 51 | Anwarul Haq S/o Shah Kamin | Sakhra | 28.12.1969 | 62.62 | U/C Sakhra | GPS Shaikhan |
| 52 | Sikandar Hayat S/o Muhammad Amin Khan | Sakhra | 03.02.1983 | 61.98 | U/C Sakhra | GPS Garmi Laloo |
| 52 | Muhammad Zuhir S/o Gul Zaman | Shah Dherai | 02.12.1983 | 60.81 | U/C Shah Dherai | GPS Serai Shahderai |
| 53 | Jamalud Din S/o Muhammad Ali Khan | Shah dherai | 06.05.1986 | 60.59 | U/C Shah Dherai | GPS Sekai Shahderai |
| 54 | Ali Akbar S/o Shamshi Bahadar | Zara Khela | 20.04.1981 | 60.07 | U/C Shamozi | GPS Jabagai |
| 55 | Muhammad Zakarya s/o tota Khan | Bar Shawar | 10.02.1985 | 61.86 | U/C Shawar | GPS Reema |
| 56 | Muhamamd Khaliq S/o Sher Zada | Kuz Shawar | 20.04.1981 | 61.78 | U/C Shawar | GPS Kandawgai |
| 57 | Jamshid S/o Talizar | Nawakaly Shin | 15.04.1978 | 57.39 | U/C Shin | GPS Bargin |
| 58 | Niamatullah S/o Ihsanullah | Deolai | 02.08.1989 | 62.49 | U/C Deolai | GPS Shage Bawrai |
| 59 | Anwar Ali S/o Shah Wazir Khan | Manai | 03.05.1990 | 61.75 | U/C Tall | GPS Mainzkhp |
| 60 | Bacha Nawab S/o Muhammad Qayum | Manai | 26.06.1991 | 61.60 | U/C Tall | GPS Belokhwar |
| 61 | Israr Ahmad S/o Nisar Ahmad | Totano Bandai | 01.03.1989 | 56.72 | U/C Totano Bandai | GPS Shagai Sarbala |

PST MALE OPEN MERIT

| S.No. | Name with parentage | Address | D/O birth | Marks | Place of posting |
|---------|--|----------------|------------|-------|--------------------------|
| 1/917 | Iqbal Hussain S/o Abdur Rauf | Kota | 07.03.1985 | 71.78 | GPS Talang |
| 2/362 | Rafiullah s/o Rehanullah | Baruma Mingora | 04.03.1985 | 70.05 | GMPS Sherabad |
| 3/645 | Barkat Al. Khan S/o Bakht Amin Khan | Hazara | 01.01.1984 | 69.92 | GPS Toolbanai |
| 4/291 | Muhammad Saleem Khan S/o Qavi Khan | Kandari | 10.01.1991 | 69.52 | GPS Langar |
| 5/1244 | Muhammad Raziq S/o Mian Salar | Kuz Shawar | 10.09.1984 | 69.45 | GPS Doughlai |
| 6/432 | Yousaf ali Shah S/o Muhammad Rahim Sahib | B.D.khela | 15.06.1981 | 69.25 | GPS Spinakhpa |
| 7/650 | Shawkat Ali S/o Taj Muhammad Khan | Nawakalay (M) | 10.03.1985 | 68.52 | GPS Rahimabad-2 |
| 8/430 | Muhammad Ahad S/o Muhammad Ambali Khan | Dakorak | 12.03.1985 | 68.31 | GMPS Egalbanr |
| 9/1703 | Nisar Ali S/o Sardar Ali | Khawaz Khela | 04.07.1986 | 68.24 | GPS Tikdari |
| 10/2032 | Farmanullah S/o SamiulHaq | Janoo | 18.03.1986 | 68.16 | GPS Babqmaira |
| 11/1121 | Hamidullah S/o Ayub Khan | Qambar | 03.05.1983 | 68.11 | GMPS Kulakarim |
| 12/902 | Attaullah S/o Habibun Nabi | Udigram | 01.06.1978 | 67.95 | GMPS Nimogram |
| 13/889 | Rahmat Ali S/o Tasir Jan | Ningolai | 01.01.1987 | 67.86 | GPS Naranpura |
| 14/1145 | Amjad Ali S/o Akbar Shah | Qambar | 18.04.1982 | 67.67 | GPS Sabonay |
| 15/1398 | Sunat Ram Chawla S/o hans Raj Chawla | Shah Dara | 30.01.1985 | 67.43 | GMPS Miangano Chum |
| 16/421 | Shafiq Ahmad S/o Shakeel Ahmad | Udigram | 17.04.1983 | 67.42 | GPS Faizabad No.2 |
| 17/16 | Muhammad Tariq S/o fazal Wadood | B.D. Khela | 10.04.1977 | 67.34 | GPS Bara Duraskhela Chum |

Ans. B(9)



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 |

آئی ایس ایس آر
بھارت
مدرسہ
بھارت
بھارت
بھارت

Attached to
File
A

Ans 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. Secondary School Teacher (BPS-16) | <p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>(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> | 21 to 35 years. | <p>1. <u>Severely Five per cent</u> by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) <u>forty per cent</u> 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> |

3/2/16

as f
f:- P.S

(SST)
2/1/16
2/1/16
2/1/16
2/1/16
2/1/16

CT

Computer Science
2/1/16

Computer Science is not present

DM

Subject
کامپیوٹر سائنس
2/1/16

Attached to b-1
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>(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)

15/5/20
High
Attached to
Princ. Cell
A

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> |

Attached do
from copy
A

Ann. C-13

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P.II
GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 24th APRIL, 2018. -7

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

NOTIFICATION

Peshawar, dated: 24th April 2017

No.SO(G7E&SE/1-85/I.T/2017- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of the notification issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment & Administration Department and Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in column No. 2 to 5 of the Appendix to the Notification which shall be applicable to the posts of Information Technology Teaching Cadre (Male/Female) in the Elementary and Secondary Education Department as specified in column No.2 of the said Appendix:

APPENDIX:

| S.No | Nomenclature of the post | Minimum qualification for appointment by initial recruitment transfer | Age limit | Method of recruitment |
|------|---|--|-----------|--|
| 1 | 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 |

میں سے

CT IT

CT IT Subject
CT Cadre

نوٹیفکیشن کے لیے مخصوص ہے
A. Heshel No
P. Heshel
Copy

Mr. C-14

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

| | | | | |
|----|--|---|-------|--|
| 2. | Secondary School Teacher-Information Technology (SST-IT) (BPS-1 i) | <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. |

CCT 1

SC pa 15

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Printed and published by the Manager,
 Sindh & Pkg. Dept., Khyber Pakhtunkhwa, Peshawar.

Attached to
 Mr. Faruq
 [Signature]

CIT
 [Signature]

Ann - C (15)

(15)

| Sl. 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 University. | 21-35 | a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years' service AND Secondary School Teacher (SST) (General/Science) possessing master degree in IT or equivalent qualification with 05 years' experience b). Fifty percent by initial recruitment. |
| 2 | Secondary School Teacher Information Technology (SST) (IT) (D-06) 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. Their seniority may be clubbed with SS and amendment may be made in the existing service rules. |
| 3 | Junior Teacher- Information Technology (JT-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. |

(SST IT)

(SST IT)

IT

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

Signature and date area with handwritten marks.

Ann. D- 16

TO, THE SECRETARY EDUCATION KHYBER PUKHTOON
KHWA.

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 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

Appellant: 2 جناب
بنام vs 1 P. Jan. Ullah

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

باعث تحریر آنکہ

مقدمہ مشدود عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی کے لئے
ان مقام سے سروس میں پیش کیا گیا ہے۔ اس لئے اس کی توجیہ اور ترمیم کے لئے
مقررہ 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 تقریر نامہ لکھنے پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک وصولی اور دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کے لئے اپیل کی برادگی
اور مشغولی نیز دائرہ کرنے اپیل گمرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ ان کے لئے ضرورت
مقدمہ کو ذمہ کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار کا نوٹی کرانے کے لئے ہمراہ یا الگ سے بجائے
تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے
اور اس کا ساختہ پر داخہ منظور قبول ہوگا و ذرا ان مقدمہ میں جو خرچہ ہر جائیداد کے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بند ہوں
گے۔ کہ پیروی نہ کر کریں۔ لہذا وکالت نامہ لکھ دیا کہ مسترد ہے۔

محکم دلائل سے مزین و متنوع ومنفرد موضوعات پر مشتمل مفت آن لائن مکتبہ

Handwritten signature/initials

Handwritten signature/initials

Handwritten signature/initials at the bottom