

10.08.2022

Appellant Deposited  
Security & Process Fee

10/8

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

(Fareeha Paul)  
Member (E)

06.10.2022

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

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

(Mian Muhammad)  
Member (E)

14.12.2021


Learned counsel for the appellant present.

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

  
(MIAN MUHAMMAD)  
MEMBER (E)

24.02.2022

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

  
Reader

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


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.  
*Last chance is given.*

  
(Kalim Arshad Khan)  
Chairman

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

Learned counsel for the appellant present.

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



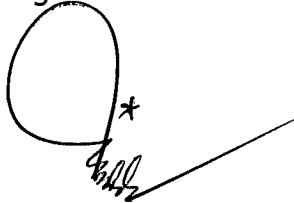
  
(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 7330 /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. Muhammad Ishaq 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>
2-		<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>
	11.10.2021	<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>

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, 3,4 and 5 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.

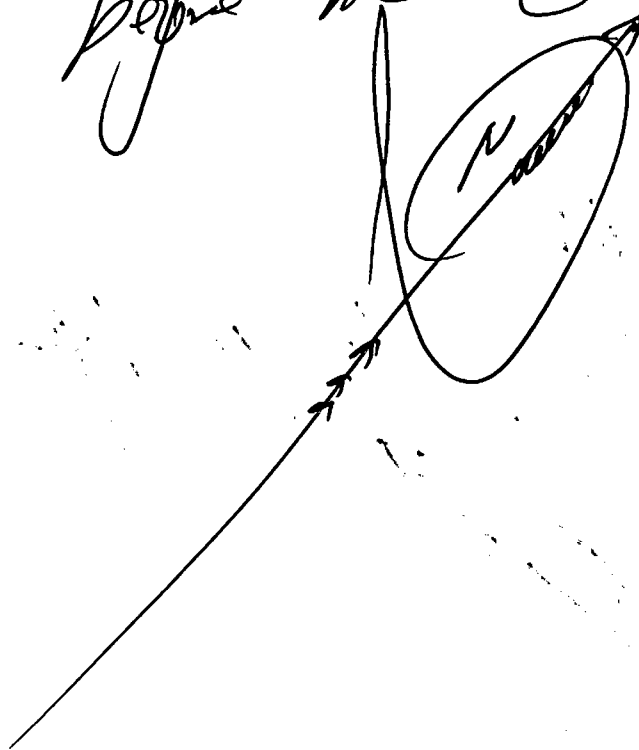
No. 1591 /S.T.

Dt. 11/08/2021.

  
REGISTRAR

L.Nawab Ali Noor Adv. Pesh.

Respectfully submitted,  
Needful are kindly put  
before the court.




The appeal of Mr. Muhammad Ishaq son of Muhammad Yahya r/o GPSS Kotkay 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 Address of the appellant is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ④ There are interruption between the heading and facts of the appeal, continuity be maintained in the memo of appeal.
- ⑤ One copy/set of the appeal for 2nd Member be submitted in file cover.
- 6- Check list is not attached.
- 7- Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter in this Tribunal.


No. 1222 /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.



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

S. Appeal N O of 2021.

1. Muhamma Ishaq

.....(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

**Through**

**Appellant**

**L.Nawab Ali Noor**  
**Advocate High Court**  
**Peshawar.**  
**03469076945**

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

**1**

S. Appeal No. of 2020.

1. Muhammad Ishaq S/O Muhammad Yahya R/O GPS Kotkay Bunner  
.....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.

2

**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 degree 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

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

#### **GROUND:**

- 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. 5

c. That notifications in questions is against the service rules, law, constitution hence no way except to award the promotion quota to appellant/appellant cadre along with back benefit from the date of notification.

d. That under what law and circumstances only appellant/appellant cadre deprived from promotion while rest of all are benefited through same notification and awarded relief with back benefit reason best known to them.

e. That under the constitution appellant has the same rights like others civil servant but same not extend equally which is injustice.

f. That act of the respondent to pick and chose is not justified at any cost which is against the basic provision of the constitution, law service rules.

g. That action on the part of respondents amount to misuse of power and approach beyond from the jurisdiction under the law mentioned for.

h. That superior court repeatedly delivered judgment in respect ART.4, 25 etc and present case respondents violated the same also.

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

inserting/ amending / Modifying to the extent of S.NO.2 column no. 5 and may please allocate promotion quota for the appellant /appellant cadre.

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

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

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

Dated:

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, Muhammad Ishaq S/O Muhammad Yahya GPS - Kotkay 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.

Deponent

(K) 4-7-21

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

S. Appeal No. of 2020.

1. Muhammad Ishaq S/O Muhammad Yahya GPS – Kotkay 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

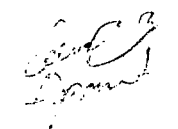
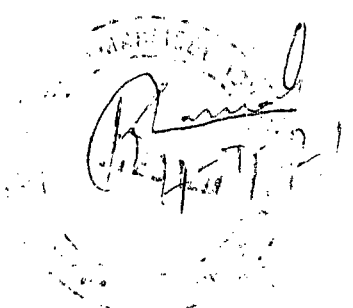
**Through**

**Applicant / Appellant**

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

**AFFIDAVIT.**

I, Muhammad Ishaq S/O Muhammad Yahya GPS – Kotkay Buner, do solemnly affirm and declare on oath that the contents of the accompanying



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



**NOTIFICATION:**

Consequent upon the recommendation of the Departmental Promotion Committee meeting held on 15-06-2020 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11/07/2012 and Finance Department Notification No. SO(FR)/FD/10-22(E)/2010 dated 16/07/2012, the following PST's BPS-12 are hereby promoted to the post of SPST's BPS-14 (Rs. 15180-1170- 50280) plus usual allowances as admissible under the rules on regular basis with immediate effect under the existing policy of the provincial Govt on the terms and conditions and posted at stations mentioned against each:

S.No	Name of Official	Present Place of Posting	School Where Posted	Remarks
1	Syed Tariq Ali Shah	GPS Malka	GPS Malka	A.V.P
2	Attaur Rahman	GPS Topai	GPS Topai	A.V.P
3	Muhammad Israr	GPS Inzar Maira No.2	GPS Inzar Maira No.2	A.V.P
4	Hameeddullah	GPS Tangora	GPS Tangora	A.V.P
5	Muhammad Israr	GPS Shamshi Kotay	GPS Shamshi Kotay	A.V.P
6	Amir zada	GPS Dokada	GPS Dokada	A.V.P
7	Izhar-Ali Khan	GPS Palang Dara	GPS Palang Dara	A.V.P
8	Ifrikhar Ahmad	GPS Amnawar No1	GPS Amnawar No1	A.V.P
9	Shah Bahadar	GPS Manizai Kawga	GPS Manizai Kawga	A.V.P
10	Syed anwar Ali Shah	GPS Shalbandai Dara	GPS Shalbandai Dara	A.V.P
11	Adnan	GPS Shanai	GPS Shanai	A.V.P
12	Said Qadim Khan	GPS Rega No1	GPS Rega No1	A.V.P
13	Ali Akbar	GPS Nawakalay	GPS Nawakalay	A.V.P
14	Kalimullah	GPS Kulyarai	GPS Kulyarai	A.V.P
15	Dawa Khan	GPS Jowar No.1	GPS Jowar No.1	A.V.P
16	Muhammad Ishaq	GPS Kotkay	GPS Kotkay	A.V.P
17	Muhammad Azharudin	GPS Hisar	GPS Hisar	A.V.P
18	Qasim Khan	GPS Shalizara	GPS Shalizara	A.V.P
19	Ikramullah	GPS Kandar Gharai	GPS Kandar Gharai	A.V.P
20	Hazrat Usman	GPS Agarai No.1	GPS Agarai No.1	A.V.P
21	Dildar Khan	GPS Kiraramal	GPS Kiraramal	A.V.P

118	Liaqat Ali	GPS Surkamar maira	GPS Surkamar maira	A.V.P
119	Noor Zeb	GPS Najar Dara	GPS Najar Dara	A.V.P
120	Asif Zaman	GPS Hakeema	GPS Hakeema	A.V.P
121	Muhammad Saeed	GPS Tangay Dara	GPS Tangay Dara	A.V.P
122	Muhammad Sajid	GPS Sura No.2	GPS Sura No.2	A.V.P
123	Sultani Room	GPS Dambar Dara	GPS Dambar Dara	A.V.P

**Terms and Conditions:-**

1. They would be on probation for a period of one year, extendable to another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded against under the relevant rules.
4. Charge report should be submitted to all concerned.
5. Their seniority in the cadre will be according to existing rules / policy.
6. No TA/DA will be allowed for joining their duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them, in light of this order, the same will be recovered and if they are wrongly promoted they will be reverted.

(MUHAMMAD AZAM KHAN)  
DISTRICT EDUCATION OFFICER(M)  
BUNER.

Endst: No. 2136-41 /Etab;(M) Pny;

Dated. 13/08/2020

Copy forwarded for information and necessary action to :-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Deputy Commissioner Buner.
3. District Accounts Officer Buner
4. District Monitoring Officer Buner
5. Sub Divisional Education Officers concerned.
6. Officials concerned.

DISTRICT EDUCATION OFFICER(M)  
BUNER

Am. B.P.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/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 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.  <i>NOTE: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial</i>

Added to File  
A

*Handwritten notes in Urdu:*  
1. SSRC Meeting  
2. Subject Specialist  
3. IT subject  
4. BPS-17  
5. 23 to 35 years  
6. 50% promotion  
7. Seniority-cum-fitness  
8. Secondary School Teachers (BPS-16)  
9. At least five years service  
10. Qualification mentioned in column No. 3  
11. If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

Ann 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) (551) (Handwritten notes in Urdu)	I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject (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; (کیمیا، بائیولوجی، فزکس اور سٹیٹسٹکس) and II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University. (کامپیوٹر سائنس)	21 to 35 years. CT DM	1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner: (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: 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; (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:

Ans f :- P.S

Subject  
 کیمیا، بائیولوجی، فزکس اور سٹیٹسٹکس  
 کیمیا، بائیولوجی، فزکس اور سٹیٹسٹکس

Computer Science is not present

Attached to b-1 copy of





Ann. 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. S. S. S.  
A

Ann. C-13

EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. PIII  
GAZETTE

# KHYBER PAKHTUNKHWA

Published by Authority

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

## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

### NOTIFICATION

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

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

#### APPENDIX:

S.No	Nomenclature of the post	Minimum qualification for appointment by initial recruitment transfer	Age limit	Method of recruitment
1	2	3	4	5
1	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

امریزیشن میں

(PST) کے لئے

CT/IT

30  
CT/IT Subject  
PST/CT Cadre

نوٹیفکیشن کے لئے مخصوص ہے  
A Peshawar No  
Peshawar Copy

Part C - (14)

1542 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24<sup>th</sup> 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 2<sup>nd</sup> Division Intermediate School Certificate or equivalent qualification from a recognized Institution or Board with one year Diploma in Information Technology Computer Science from any recognized institution; and</p> <p>ii. Certified Teacher Certificate (CT) or Associate Degree in Education (ADE) from any recognized institution/ University</p> <p>Note: A candidate did not have the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.</p>	18-35	By initial recruitment.

(CT)

pa 15

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

CTC  
 ed

Attached to  
 b. Pw  
 [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 (ES-17) (B-17) Government Higher Secondary Schools/ Govt. comprehensive: High Schools and other equivalent posts in the Teaching Cadre.	i.) Master Degree in Computer Science/IT at least in 2 <sup>nd</sup> Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 <sup>nd</sup> Division from any recognized University.	21-35	a). Fifty percent by promotion on the basis of seniority-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 <sup>nd</sup> Division or equivalent Qualification from any recognized Institution. ii.) Bachelor Degree of Education (B. Ed) at least in 2 <sup>nd</sup> Division from any recognized Institution.	21-35	a). Fifty percent by promotion on the basis of seniority-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-17) (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.

(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.

*[Handwritten signature]*

to be

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



بعدالت

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

Muhammed Ishaq

Appellant

2 پنجاب  
بنام

vs

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

مورد

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

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

آن مقام سروس سٹریٹمنٹل سٹارٹ کیلئے ایپل کور علی کور الیڈو سٹیک

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثانیہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور دعویٰ اور درخواست ہر قسم کی تصدیق

زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا ڈگری یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از انہذا ضرورت

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 اختیار 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 سندر ہے۔

محمد سروس سٹریٹمنٹل سٹارٹ ایڈو سٹیک