


10.08.2022

Appellant Deposited
Security & Process Fee
10/8

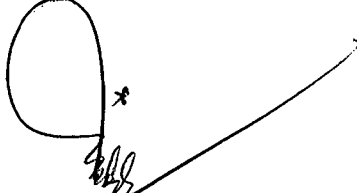
Learned counsel for the appellant present and submitted an application for submission of security and process fee. Application allowed with direction to submit security and process fee within 3 days, thereafter notices be issued to respondents for submission of written reply/comments. To come up for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

23rd May, 2022

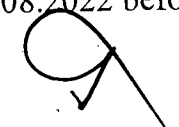
Learned counsel for the appellant present and requests for adjournment in order to properly assist the court. Adjourned. To come up for preliminary hearing before SB on 06.07.2022. *Last chance is given*


(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.



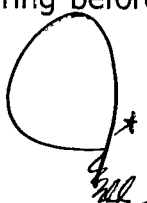

(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2338 /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 Sonia 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 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.

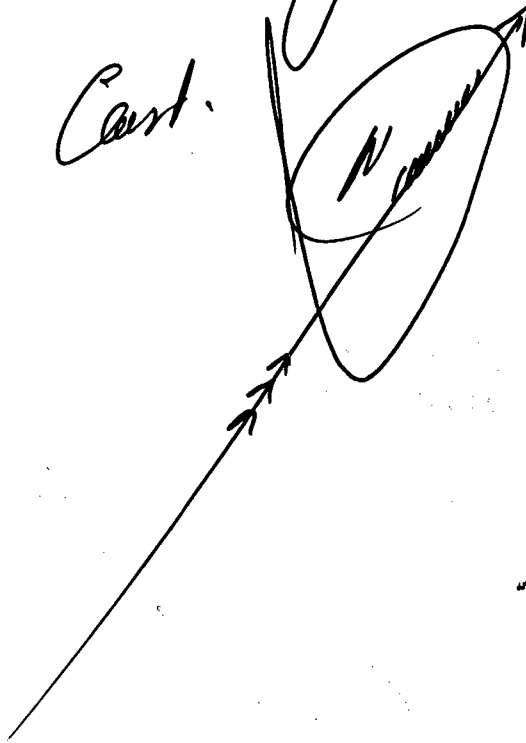
No. 1598/S.T.

Dt. 11/08/2021.


REGISTRAR

L.Nawab Ali Noor Adv. Pesh.

Respectfully Submitted,
Sudhakar Kumar Prudhvi put before
The Court.

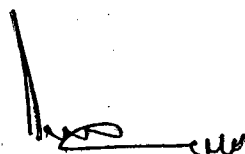


The appeal of Sonja son of Mehman Ali Shah r/o Ghari Chiragh Shah post office Nahqi Peshawar received today i.e. on 12.07.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 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 paragraph of the memo of appeal according to sub-rule-2(b) of rules-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Check list is not attached with the appeal.
- ⑤ One copy/set of the appeal for 2nd Member be submitted in file cover.
- 6- Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter in this Tribunal.

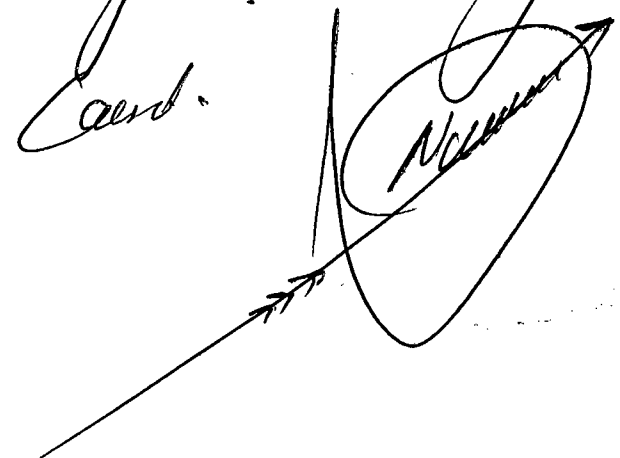
No. 1282 /S.T,

Dt. 13/07 /2021


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. L. Nawab Ali Noor Adv. Pesh.

*Respectfully Submitted,
Hand full done lastly put before the
Card.*



BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

S. Appeal N O of 2021.

7338/21

I. Sonya S/O Mehman Ali Shah R/O Ghari Chiragh Shah P/O Nahqi
Peshawar.

.....(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

S. Appeal No. of 2020.

1. Sonia S/O Mehman Ali Shah R/O Ghari Chiragh Shah P/O Nahqi Peshawar.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 *Near No. 1 School*, 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:

2

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.

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 D.

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

GROUNDS:

yyyyy. 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 .

zzzzz. 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

aaaaaa. 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 .

bbbbbb. 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.

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

dddddd. 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.

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

ffffff. 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

[Signature]
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, . Sohail Ahmad S/O Amir Abdullah Shah R/O Dhand Hujra Kalpani Tehsil Gagra Distt Bunir , 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



BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

S. Appeal No. of 2020.

1. Sonia S/O Mehman Ali Shah R/O Ghari Chiragh Shah P/O Nahqi Peshawar.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

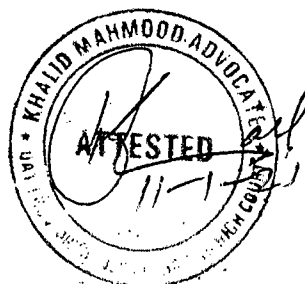
Su
Applicant/Appellant

L. Nawab Ali Noor Advocate
High Court Peshawar.

AFFIDAVIT.

I, Sonia S/O Mehman Ali Shah R/O Ghari Chiragh Shah P/O Nahqi Peshawar, 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.

Su
Deponent





7

Office of the
District Education Officer, Female
Peshawar

APPOINTMENT:-

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of CT, School based in BPS-15 (Rs.10985-905-38135) @ Rs. 10985/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

S.#	Name of Candidate	Father's Name	Domicile	CNIC	Score	Place of Duty	Remarks
1	ANISA	KHAN ZAMAN	Peshawar	17301-7453964-8	127.36	GGHS Budni Peshawar	Against Vacant Post
2	ASMA AFZAL KHAN	JAMAL SALIM	Peshawar	17301-7552417-6	115.06	GGHS Budni Peshawar	Against Vacant Post
3	SHABEENA NAZ	ABDUL JALIL KHAN	Peshawar	17301-6935768-2	124.56	GGHS CHAGHAR MATTI PESHAWAR	Against Vacant Post
4	SYEDA AISHA HUMAIRA	SYED QASIM SHAH	Peshawar	17301-8820662-0	111.88	GGHS CHAGHAR MATTI PESHAWAR	Against Vacant Post
5	SOHNYA	SYED ABDUL QYUME SHAH	Peshawar	17301-1305005-0	98.84	GGHS Khoida Khel Peshawar	Against Vacant Post
6	SHABNAM NOOR	NOOR UL HAQ	Peshawar	17301-2005180-8	112.87	GGHS Kukar Peshawar	Against Vacant Post
7	SAIMA GUL	RAZ MUHAMMAD	Peshawar	17301-3301965-8	118.40	GGHS Malogo Peshawar	Against Vacant Post
8	SANA JAVED	JAVED KHAN	Peshawar	17301-6744865-6	113.08	GGHS Malogo Peshawar	Against Vacant Post
9	HUMA SYED	MUSHTAQ ALI SHAH	Peshawar	17301-0698215-4	110.76	GGHS Mian Gujar Peshawar	Against Vacant Post
10	NAHEED	AURANGZEB	Peshawar	15402-0788847-4	111.18	GGHS Mian Gujar Peshawar	Against Vacant Post
11	NADIA GUL	MEHMAN ALI SHAH	Peshawar	17301-9240682-6	127.48	GGHS Nahaqi Peshawar	Against Vacant Post
12	HASEENA	SARDAR ALI KHAN	Peshawar	15602-4175281-6	115.57	GGHS Nahaqi Peshawar	Against Vacant Post
13	AISHA IMTIAZ SETHI	KHWAJA IMTIAZ AHMAD SETHI	Peshawar	17301-5487530-8	116.67	GGHS Pakha Ghulam Peshawar	Against Vacant Post
14	FAIZA WARIS	WARIS KHAN	Peshawar	17301-1244941-0	109.61	GGHS Passani Peshawar	Against Vacant Post
15	FAKHRA FARID	FARID ULLAH	Peshawar	17301-1275024-2	108.58	GGHS Qilla Sher Dil Khan Peshawar	Against Vacant Post
16	SAIMA BIBI	RAJ WALI	Peshawar	17301-5922689-2	112.07	GGHS Urmar Miana Peshawar	Against Vacant Post
17	NAZISH ASHRAF	MUHAMMAD ASHRAF	Peshawar	17301-7963190-6	109.98	GGHS Urmar Miana Peshawar	Against Vacant Post
18	UZMA GUL	GUL REHMAN	Peshawar	17301-2435615-6	106.22	GGHS Urmar Payan Peshawar	Against Vacant Post
19	SAJIDA NOREEN	MUHAMMAD TARIQ	Peshawar	17301-0495363-4	121.98	GGHS Wadpaga Peshawar	Against Vacant Post
20	NADIA NOOR AHMAD	NOOR AHMAD	Peshawar	17301-9619155-4	121.37	GGHS Wadpaga Peshawar	Against Vacant Post

21	UZMA	SAMAND KHAN	Peshawar	17301-1722663-0	101.00	GGHSS Mathra Peshawar	Vacant Post
22	KALSOOM ZAKIR	ZAKIR ULLAH	Peshawar	17301-0989622-8	116.17	GGHSS Mathra Peshawar	Against Vacant Post
23	NAHEEDA BIBI	MUHAMMAD IBRAHIM	Peshawar	17301-7492616-8	110.26	GGHSS Mathra Peshawar	Against Vacant Post
24	IMAAAN RAHAT	RAHAT ULLAH	Peshawar	17301-2204892-0	113.38	GGHSS Tarnab Farm Peshawar	Against Vacant Post
25	MARIA SALEEM	MUHAMMAD SALEEM	Peshawar	17301-2354161-4	135.79	GGMHS Dabgari Garden Peshawar	Against Vacant Post
26	FOZIA BIBI	MUHAMMAD SABIR	Peshawar	17301-9236458-2	126.90	GGMHS Dabgari Garden Peshawar	Against Vacant Post
27	MUBINA TARIQ	MUHAMMAD TARIQ	Peshawar	17103-3215944-7	126.77	GGMHS Dabgari Garden Peshawar	Against Vacant Post
28	BUSHRA SABA	MAQSOOD IQBAL	Peshawar	17301-3181937-2	124.15	GGMHS Dabgari Garden Peshawar	Against Vacant Post
29	SAFIA SHAHZAD	SHAHZAD GUL	Peshawar	17301-0943435-0	122.86	GGMHS Dabgari Garden Peshawar	Against Vacant Post
30	GUL MINA SABIR	SABIR KHAN	Peshawar	17301-9812311-8	121.47	GGMHS Dabgari Garden Peshawar	Against Vacant Post
31	NABEELA GUL	SAREER KHAN	Peshawar	17301-9843943-8	120.82	GGMHS Dabgari Garden Peshawar	Against Vacant Post
32	ZOHRA ALAM	ALAM ZEB	Peshawar	17301-0316750-4	120.03	GGMHS Dabgari Garden Peshawar	Against Vacant Post
33	SAIMA MISRI	MISRI KHAN	Peshawar	17301-1331248-0	99.50	GGMS Arhat Koroona Peshawar	Against Vacant Post
34	SADIA AMAN	AMANULLAH	Peshawar	17201-9586259-2	106.51	GGHS Aza Khel Peshawar	Against Vacant Post
35	ABIDA BIBI	QASIM KHAN	Peshawar	17301-4786321-0	106.50	GGMS Bazid Khel Peshawar	Against Vacant Post
36	RUQAYYA REHMAN	REHMAN GUL	Peshawar	17301-5400654-8	110.49	GGMS Ghari Jalal Din Peshawar	Against Vacant Post
37	SALMA NOREEN	ABDUR RASHED	Peshawar	17301-5376962-2	105.97	GGMS Ghari Jalal Din Peshawar	Against Vacant Post
38	SAFINA NAZ	MUHAMMAD JALIL AKHTER	Peshawar	17301-1118172-0	99.37	GGMS Gulfam Killi Peshawar	Against Vacant Post
39	AISHA	HAIJ SHAH JEHAN	Peshawar	17301-1998488-6	116.44	GGMS Masho Khel Peshawar	Against Vacant Post
40	SAIRA	ABDUL GHAFOR	Peshawar	17301-3244399-0	113.16	GGMS Masho Khel Peshawar	Against Vacant Post
41	SAYYEDA SADAF	MUQUARAB SHAH	Peshawar	17301-3237174-2	120.72	GGMS Regi Peshawar	Against Vacant Post
42	SAIRA JAMIL	MIAN FAZL E JAMIL	Peshawar	17101-3498358-4	109.38	GGMS Sarfaraz Abad Peshawar	Against Vacant Post
43	NAYAB GUL	FARID ULLAH	Peshawar	17301-5780926-2	96.94	GGMS Sarfaraz Abad Peshawar	Against Vacant Post
44	ROOMI GUL	SANAB GUL	Peshawar	17301-7094707-6	111.14	GGMS Shakar Pura Peshawar	Against Vacant Post
45	ZAIB UN NISA	ATTA ULLAH	Peshawar	17301-4458707-6	106.98	GGMS Sheikh Muhammadi Peshawar	Against Vacant Post
46	TALAT JABEEN	NOOR UL AMAN	Peshawar	17301-0887031-0	102.51	GGMS Sheikh Muhammadi Peshawar	Against Vacant Post

2% DISABLE QUOTA:

S.#	Name of Candidate	Father's Name	Domicile	CNIC	Score	Place of Duty	Remarks
1	BASRAJA	SPIN GUL	Peshawar	17301-9280026-2	104.48	GGHS Aza Khel Peshawar	Against Vacant Post

3% MINORITY QUOTA:

	Name of Candidate	Father's Name	Domicile	CNIC	Score	Place of Duty	Remarks
1	NOSHEEN	ZAHOOR	Peshawar	17301-4601972-4	89.81	GGMS Urmar Bala Peshawar	Against Vacant Post
2	IRUM	TAJ	Peshawar	17301-1113542-8	80.45	GGHS Sufaid Sung Peshawar	Against Vacant Post

TERMS & CONDITIONS:-

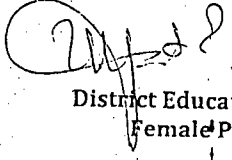
1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the undersigned, any one found producing bogus/fake Degrees/Certificates will be reported to the law enforcing agencies for further action.
5. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, one-month pay/allowances shall be forfeited to the Government.
6. Pay will not be drawn until and unless a certificate to the effect by the undersigned is issued that their degrees/certificates are verified from the concerned agencies.
7. They should join their post within 20 days of the issuance of this notification. In case of failure to join their post within one month of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
8. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. Before handing over charge they will sign an agreement with the department, otherwise this order will not be valid.
10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
11. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
12. Their appointment is made on School based, they will have to serve at the place of posting, and thier services are not transferable to any other station.
13. Before handing over charge once again their documents may be checked if they have not the required qulifications they may not be handed over charge.

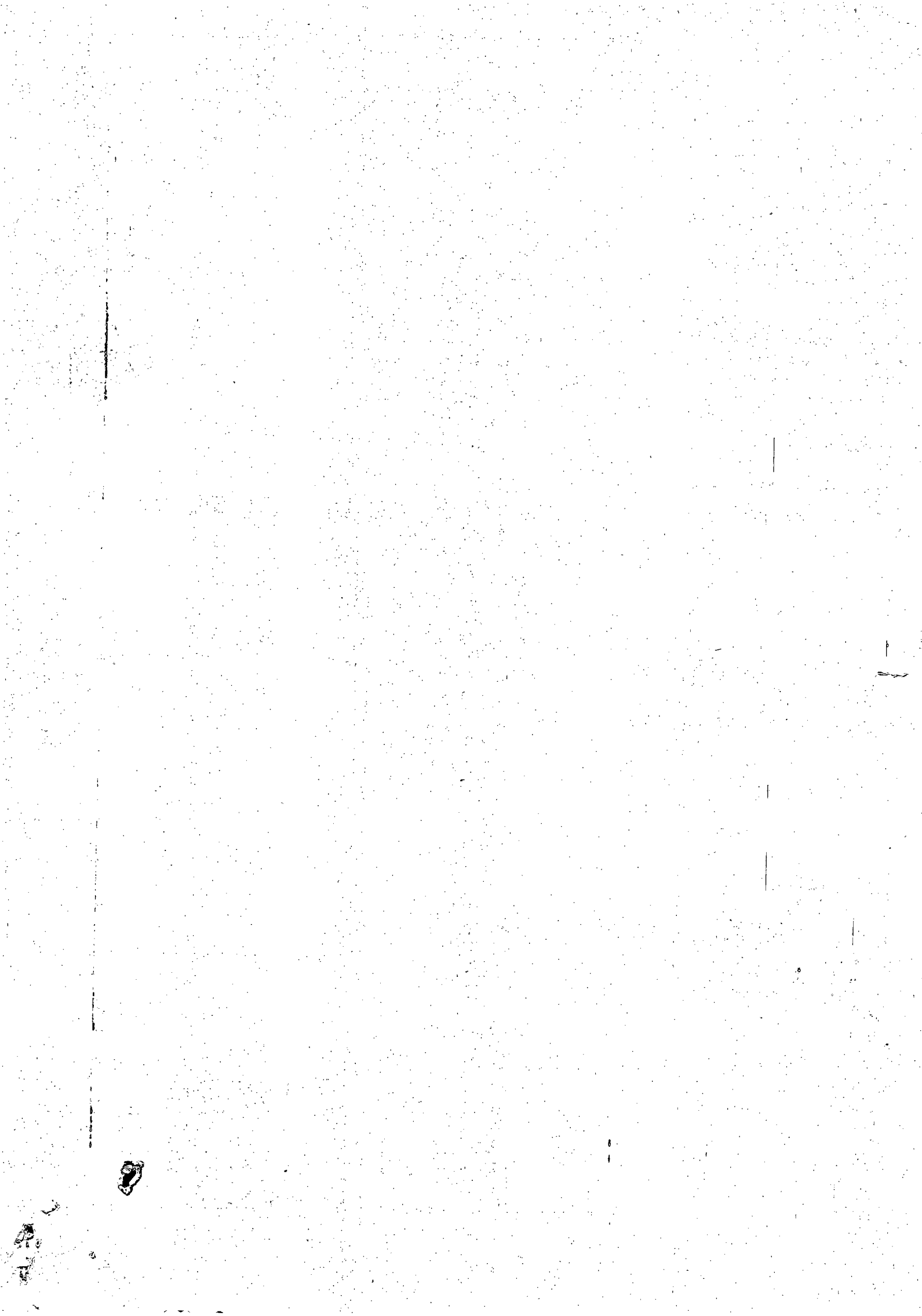
(Ulfat Begum)
District Education Officer
Female Peshawar

Endst: No. 1587-1694 Dated Peshawar the 14/05/2016

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Principal/Headmistress Concerned
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
4. Budget & Accounts Officer, Local Office.
5. Superintendent Estb: Local Office.
6. Cashier Local Office.
7. PA Local Office.
8. Officials Concerned.
9. M/File


District Education Officer
Female Peshawar





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber 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. NOTE: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

Handwritten notes in Urdu:
SSRC کے لیے
موضوعات
کے لیے
مقررہ ہے
مقررہ ہے
مقررہ ہے

Handwritten notes:
Allocated to
Form
A

Mr. B. C.

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

1	2	3	4	5
1B.	<p>Secondary School Teacher (BPS-16)</p> <p>(SST)</p> <p>۱. فزیک، کیمیا، حیاتیات</p> <p>۲. ریاضیات، آمار، آشنایی با کامپیوتر</p> <p>۳. ادبیات و دیگر گروہ ہنر و سائنس</p> <p>۴. دیگر گروہ ہنر و سائنس</p> <p>۵. دیگر گروہ ہنر و سائنس</p> <p>۶. دیگر گروہ ہنر و سائنس</p> <p>۷. دیگر گروہ ہنر و سائنس</p> <p>۸. دیگر گروہ ہنر و سائنس</p> <p>۹. دیگر گروہ ہنر و سائنس</p> <p>۱۰. دیگر گروہ ہنر و سائنس</p> <p>۱۱. دیگر گروہ ہنر و سائنس</p> <p>۱۲. دیگر گروہ ہنر و سائنس</p> <p>۱۳. دیگر گروہ ہنر و سائنس</p> <p>۱۴. دیگر گروہ ہنر و سائنس</p> <p>۱۵. دیگر گروہ ہنر و سائنس</p> <p>۱۶. دیگر گروہ ہنر و سائنس</p> <p>۱۷. دیگر گروہ ہنر و سائنس</p> <p>۱۸. دیگر گروہ ہنر و سائنس</p> <p>۱۹. دیگر گروہ ہنر و سائنس</p> <p>۲۰. دیگر گروہ ہنر و سائنس</p> <p>۲۱. دیگر گروہ ہنر و سائنس</p> <p>۲۲. دیگر گروہ ہنر و سائنس</p> <p>۲۳. دیگر گروہ ہنر و سائنس</p> <p>۲۴. دیگر گروہ ہنر و سائنس</p> <p>۲۵. دیگر گروہ ہنر و سائنس</p> <p>۲۶. دیگر گروہ ہنر و سائنس</p> <p>۲۷. دیگر گروہ ہنر و سائنس</p> <p>۲۸. دیگر گروہ ہنر و سائنس</p> <p>۲۹. دیگر گروہ ہنر و سائنس</p> <p>۳۰. دیگر گروہ ہنر و سائنس</p> <p>۳۱. دیگر گروہ ہنر و سائنس</p> <p>۳۲. دیگر گروہ ہنر و سائنس</p> <p>۳۳. دیگر گروہ ہنر و سائنس</p> <p>۳۴. دیگر گروہ ہنر و سائنس</p> <p>۳۵. دیگر گروہ ہنر و سائنس</p> <p>۳۶. دیگر گروہ ہنر و سائنس</p> <p>۳۷. دیگر گروہ ہنر و سائنس</p> <p>۳۸. دیگر گروہ ہنر و سائنس</p> <p>۳۹. دیگر گروہ ہنر و سائنس</p> <p>۴۰. دیگر گروہ ہنر و سائنس</p> <p>۴۱. دیگر گروہ ہنر و سائنس</p> <p>۴۲. دیگر گروہ ہنر و سائنس</p> <p>۴۳. دیگر گروہ ہنر و سائنس</p> <p>۴۴. دیگر گروہ ہنر و سائنس</p> <p>۴۵. دیگر گروہ ہنر و سائنس</p> <p>۴۶. دیگر گروہ ہنر و سائنس</p> <p>۴۷. دیگر گروہ ہنر و سائنس</p> <p>۴۸. دیگر گروہ ہنر و سائنس</p> <p>۴۹. دیگر گروہ ہنر و سائنس</p> <p>۵۰. دیگر گروہ ہنر و سائنس</p> <p>۵۱. دیگر گروہ ہنر و سائنس</p> <p>۵۲. دیگر گروہ ہنر و سائنس</p> <p>۵۳. دیگر گروہ ہنر و سائنس</p> <p>۵۴. دیگر گروہ ہنر و سائنس</p> <p>۵۵. دیگر گروہ ہنر و سائنس</p> <p>۵۶. دیگر گروہ ہنر و سائنس</p> <p>۵۷. دیگر گروہ ہنر و سائنس</p> <p>۵۸. دیگر گروہ ہنر و سائنس</p> <p>۵۹. دیگر گروہ ہنر و سائنس</p> <p>۶۰. دیگر گروہ ہنر و سائنس</p> <p>۶۱. دیگر گروہ ہنر و سائنس</p> <p>۶۲. دیگر گروہ ہنر و سائنس</p> <p>۶۳. دیگر گروہ ہنر و سائنس</p> <p>۶۴. دیگر گروہ ہنر و سائنس</p> <p>۶۵. دیگر گروہ ہنر و سائنس</p> <p>۶۶. دیگر گروہ ہنر و سائنس</p> <p>۶۷. دیگر گروہ ہنر و سائنس</p> <p>۶۸. دیگر گروہ ہنر و سائنس</p> <p>۶۹. دیگر گروہ ہنر و سائنس</p> <p>۷۰. دیگر گروہ ہنر و سائنس</p> <p>۷۱. دیگر گروہ ہنر و سائنس</p> <p>۷۲. دیگر گروہ ہنر و سائنس</p> <p>۷۳. دیگر گروہ ہنر و سائنس</p> <p>۷۴. دیگر گروہ ہنر و سائنس</p> <p>۷۵. دیگر گروہ ہنر و سائنس</p> <p>۷۶. دیگر گروہ ہنر و سائنس</p> <p>۷۷. دیگر گروہ ہنر و سائنس</p> <p>۷۸. دیگر گروہ ہنر و سائنس</p> <p>۷۹. دیگر گروہ ہنر و سائنس</p> <p>۸۰. دیگر گروہ ہنر و سائنس</p> <p>۸۱. دیگر گروہ ہنر و سائنس</p> <p>۸۲. دیگر گروہ ہنر و سائنس</p> <p>۸۳. دیگر گروہ ہنر و سائنس</p> <p>۸۴. دیگر گروہ ہنر و سائنس</p> <p>۸۵. دیگر گروہ ہنر و سائنس</p> <p>۸۶. دیگر گروہ ہنر و سائنس</p> <p>۸۷. دیگر گروہ ہنر و سائنس</p> <p>۸۸. دیگر گروہ ہنر و سائنس</p> <p>۸۹. دیگر گروہ ہنر و سائنس</p> <p>۹۰. دیگر گروہ ہنر و سائنس</p> <p>۹۱. دیگر گروہ ہنر و سائنس</p> <p>۹۲. دیگر گروہ ہنر و سائنس</p> <p>۹۳. دیگر گروہ ہنر و سائنس</p> <p>۹۴. دیگر گروہ ہنر و سائنس</p> <p>۹۵. دیگر گروہ ہنر و سائنس</p> <p>۹۶. دیگر گروہ ہنر و سائنس</p> <p>۹۷. دیگر گروہ ہنر و سائنس</p> <p>۹۸. دیگر گروہ ہنر و سائنس</p> <p>۹۹. دیگر گروہ ہنر و سائنس</p> <p>۱۰۰. دیگر گروہ ہنر و سائنس</p>	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject; (کیمیا، حیاتیات، فزیک، ریاضیات، آمار، آشنایی با کامپیوتر) and (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> <p>Computer Science is not present</p>	21 to 35 years.	<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>

Ans f

f:- P.S

Subject

کیمیا، حیاتیات، فزیک، ریاضیات، آمار، آشنایی با کامپیوتر

27. PST (IT)

Computer Science is not present

Attached to be 1
copy of

			<p style="text-align: center;">Q</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 (SPS-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 (SPS-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>
--	--	--	---	---

ASST. Dir. High

Attached to
P. S. C. Office
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>

Approved do
J. S. S. S. S. S.
A

Ann. C-13

EXTRAORDINARY
GOVERNMENT



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

APPENDIX:

S.No	Nomenclature of the post	Minimum qualification for appointment by initial recruitment transfer	Age limit	Method of recruitment
1	2	3	4	5
	Subject Specialist- Information Technology (SS-IT) (SPS-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.

من زینت میں
میں

CT
IT
30

CT IT Subject
CT Cadre

نوٹیفکیشن کے لیے مخصوص کمرے میں لکھیں
A Peshawar
Copy

14

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

<p>2. Secondary School Teacher-Information Technology (SST-IT) (BPS-11)</p>	<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>	<p>21-35</p>	<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>
<p>3. Certified Teacher Information Technology (CT-IT) (BPS-12)</p> <p>(CTI)</p> <p>pa 15</p>	<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>	<p>18-35</p>	<p>By initial recruitment.</p>

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Printed and published by the Manager,
Staly. & Ptg. Dept., Khyber Pakhtunkhwa, Peshawar.

Attached to
to - Pw copy

ETC
ed

Ann - C (15)

(15)

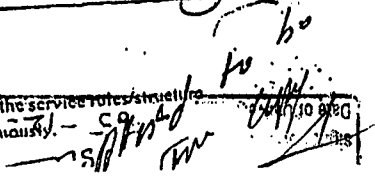
No	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1	Subject Specialist-Information Technology (ES-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in the Teaching Cadre.	i.) Master Degree in Computer Science/IT at least in 2 nd Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 nd Division from any recognized 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-17) Govt. High / Higher Secondary Schools	i). Bachelor Degree with the subject of Computer Science at least in 2 nd Division or equivalent Qualification from any recognized institution. ii). Bachelor Degree of Education (B. Ed) at least in 2 nd Division from any recognized institution.	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Computer Lab in-charge with (05) years' service having the qualification prescribed for the post of IT Teacher. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre then by initial recruitment.
3	Junior Teacher- Information Technology (JF-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.

for to


Ann. D- 16

TO, THE SECRETARY EDUCATION KHYBER PUKHTOON
KHWA .

DEPARTMENTAL APPEAL NO OF 2020.

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

[Signature]
A. Prakash

[Signature]
Dated 11/4/21

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

May also awarded the relief to me of 7 years duration of service of SST*IT*BPS-16 with all back benefit from 2014.

It is further requested to consider me for promotion for the post please allocate promotion quota for the appellant, appellant for the post amending / Modifying to the extent of S.NO. 2 column no. 5 and

as well as service rules 24.2.2018 also may kindly be / inserting / table by including / inserting / amending / Modifying service rules as 24.7.2014 to the extent of the S.NO. 1B Column No. 5 of the / declare, null and void / amended / modified the notification dated

service appeal your honor may graciously be pleased to set aside / It is therefore most humbly prayed that on acceptance of this promotion.

It is therefore most humbly prayed that on acceptance of this promotion. PST. IT my cadre computer science not mentioned in rules for which is great discrimination. That entire five category except side I am not entitled for the promotion while rest is entitled for appointment on basis of the same qualification while on other was not awarded promotion. That if I am entitled for fitness I being full fill all mentioned required above even then I

[Signature]
A. Prakash

Before S.T. U.P. & Peshawar

Sonia

vs

2 مخائب
بنام

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

مورخ

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 سٹریٹجی کے ایس ایس کے لئے ایس ایس کے لئے ایس ایس کے لئے
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 حاصل کرنے 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 کے طرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از اس کے لئے 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 باختیارات 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 لکھد یا کہ سندر ہے۔

المترقوم

ہا

20

العہدہ گواہ العہدہ
مقام سروس سٹریٹجی کے لئے منظور ہے۔