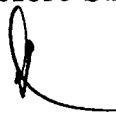


11.10.2022

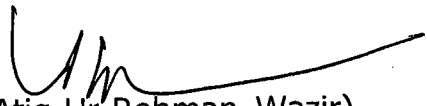
Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional AG for respondents present.

File to come up alongwith connected Service Appeal No. 2375/2021 titled "Ikram Ullah Vs. Government of Khyber Pakhtunkhwa" on 16.11.2022 before S.B.


(Fareeha Paul)
Member (E)

12.01.2022

Learned counsel for the appellant present and submitted application for the grant of permission to deposit security & process fee. Application is allowed and learned counsel for the appellant is directed to deposit security & process fee within 03 working days. Thereafter, notice be issue to respondents for submission of reply/comments before the S.B on 15.03.2022


(Atiq-Ur-Rehman Wazir)
Member (E)

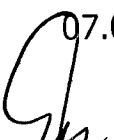
15.03.2022

Due to retirement of the Worthy Chairman, case is adjourned to 07.06.2022 for the same as before.


Reader

07.06.2022

Clerk to counsel for the appellant present.


Appellant Deposited
Security & Process Fee

File to come up alongwith connected Service Appeal No.2375/2021 titled Ikram Ullah Vs. Government of Khyber Pakhtunkhwa on 25.07.2022 before S.B.


(Rozina Rehman)
Member (J)

25.07.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.2375/2021 titled "Ikram Ullah Vs. Government of Khyber Pakhtunkhwa" on 11.10.2022 before S.B.

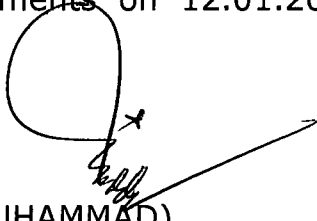

(Rozina Rehman)
Member (J)

05.10.2021

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant, in the instant service appeal, has challenged and assailed the impugned Service Rules of the respondent-department dated 24.07.2014 and 24.04.2018 whereby no quota has been specifically allocated for appellant's cadre i.e PST (IT). On non-action/response on his departmental appeal, the appellant approached Peshawar High Court in Writ Petition No. 596-P/2019 which was dismissed in limine on the ground of being wrong forum, vide order dated 03.09.2020. The appellant thereafter preferred departmental appeal on 20.10.2020 which was not responded within the stipulated statutory period hence the instant service appeal submitted in the Service Tribunal on 08.02.2021. On the question of limitation and maintainability, learned counsel for the appellant relied on the admission of an earlier Service Appeal No. 12230/2020 titled Fazal Hayat Versus Education Department etc. Moreover, judgement of the Larger Bench delivered by this Tribunal on 14.01.2021 in Service Appeal No. 868/2019 titled Iftikhar Khan Versus Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar and three other respondents, was quoted through which the question of Service Rules and admissibility of service appeal against impugned Service Rules has been discussed at length and decided accordingly.

Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections including time limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 12.01.2022 before the D.B.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

23.07.2021

Junior to counsel for the appellant present and seeks adjournment due to non-availability of learned senior counsel for the appellant. Request accorded.

Case to come up for preliminary hearing on 05.10.2021 before S.B.

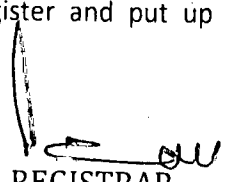




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 2377 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/02/2021	<p>The appeal presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/4/21</u></p> <p> CHAIRMAN</p>
	12.04.2021	<p>Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 20.07.2021 for the same as before.</p> <p> Reader</p>
	20.07.2021	<p>As 20th July, 2021 has been declared public holiday on account of Eid ul Azha, therefore, case is adjourned to 23.07.2021 for the same as before.</p> <p> Reader</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 2377/2021

SHEHZAD AHMAD

VS

EDUCATION DEPTT

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4	Educational Testimonials	B	12-15
5	Notification Dated 24-07-2014	C	16-22
6	Notification Dated 24-04-2018	D	23-31
7	Judgment Dated 03-09-2020	E	32-35
8	Departmental Appeal	F	36
9	Vakalatnama	37

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK

OFFICE: Flat No.4, 2nd Floor,

Juma Khan Plaza,

Near FATA Secretariat,

Warsak Road, Peshawar.

0345-9383141.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

Mr. Shehzad Ahmad, PST (BPS-12),
GPS Saeed Abad, District Mardan.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3- The Secretary Establishment Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 4- The Secretary, E&S Education Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 5- The Director, E&S Education, Khyber Pakhtunkhwa, Peshawar.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED SERVICE RULES NOTIFIED ON 24-7-2014 WHEREBY NOT INCLUDING THE SUBJECT OF COMPUTER SCIENCE IN THE ELIGIBILITY CRITERIA FOR PROMOTION OF DM's TO THE POST OF SST (BPS-16) AND AGAINST THE SERVICE RULES NOTIFIED ON 24-4-2018 TO THE EXTENT OF S. NO. 2 COLUMN NO.5 OF THE TABLE WHEREBY NO QUOTA HAS BEEN ALLOCATED FOR APPELLANT CADRE i.e. PST AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned service rules Notified on 24-07-2014 may kindly be amended/ modified to the extent of serial No. 1B column No.3 of the table by including/ inserting the computer science subject of the appellant in column No. 3 and the impugned service rules dated 24-04-2018 may kindly be amended/ modified to the extent of Serial No. 2 in column No.5 of the table by allocating promotion quota for the appellant's cadre i.e. PST and the respondents may further please be directed to consider the appellant for promotion to the posts of SST (BPS-16) or SST(IT) with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:
ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was appointed as PST in the respondent No.5 Department and regularized is serving the Department quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure..... **A.**
- 2- That it is pertinent to mention here that appellant qualification is B.Sc. in Computer Science and was appointed/ selected on this qualification in the respondent No.5 department. Copies of the educational testimonial are attached as annexure.....**B.**
- 3- That it is important to mention here that the respondents framed service structure/ rules of the different teaching cadres vide notification dated 24-07-2014, wherein Serial No. 1B the post has been mentioned as SST (BPS-16) for which the qualification and eligibility has been mentioned in column No.3 i.e. by including all subjects except the subject of appellant i.e. Computer science subject. Copy of the notification dated 24-07-2014 is attached as annexure **C.**
- 4- That it is further to mention here that the respondents vide notification dated 24-04-2018 notified service structure/ rules for the different cadres of Information technology including the post of Secondary School Teacher- Information Technology SST (BPS-16) on Serial No.2 and in column No.5 of the table wherein eligibility for promotion to the post of SST-IT was mentioned as follows:

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.

b) Fifty percent by initial recruitment.

But in the said Rules again the cadre of the appellant has been ignored i.e. PST Computer Science. Copy of the notification dated 24-04-2018 is attached as annexure..... **D.**

- 5- That where after Colleague of the appellant preferred a writ petition No. 596-P/2019 before the August Peshawar High Court, Peshawar and the same was dismissed as not maintainable and

was directed that he may seek his remedy from proper forum i.e. Khyber Pakhtunkhwa Service Tribunal Peshawar vide judgment dated 03-09-2020. Copy of the judgment dated 03-09-2020 is attached as annexure..... E.

- 6- That appellant feeling aggrieved from both of the notifications mention above had preferred a departmental appeal/ representation. Copy of the departmental appeal is attached as annexure.....F.
- 7- That having no other remedy the appellant preferred the instant appeal on the following grounds amongst others.

GROUND:

- A- That the by not including the subject of computer science in the impugned service rules dated 24-07-2014 and not allocating the quota for appellant cadre i.e. PST (Computer Science) in the impugned service rules dated 24-04-2018 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/ rectified to the extent that subject of computer science in the eligibility criteria in the service rules dated 24-07-2014 may be included and the quota of the appellant cadre be allocated in the service rules dated 24-04-2018.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the said service rules dated 24.7.2014 and 24.4.2018 are violative of Section-9 of the Civil Servant Act, 1973 read with Rule-7 of the Appointment, Promotion and Transfer Rules, 1989.
- D- That the respondents acted in arbitrary and mala fide manner while issuing the impugned service rules dated 24-07-2014 and dated 24-04-2018 by not including the subject of computer science and not allocating the promotion quota for the cadre of appellant quota.
- E- That the act and action of the respondents is discriminatory, therefore not tenable and liable to be modified/ rectified.
- F- That under Article 38(e) of the Constitution of Pakistan 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various service of Pakistan.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 01.02.2021.

APPELLANT

Shehzad

SHEHZAD AHMAD

THOROUGH:

z
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

SHAHZULLAH YOUSAFZAI

&

AF
AFRASIAB KHAN WAZIR
ADVOCATES

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

SHEHZAD AHMAD

VS

EDUCATION DEPTT:

APPLICATION FOR RESTRAINING THE RESPONDENTS
NOT TO FILL UP THE SECONDARY SCHOOL TEACHER
(BPS-16) POSTS FROM PROMOTION QUOTA TILL THE
FINAL DISPOSAL OF THE INSTANT APPEAL

R.SHEWETH:

1. That, the appellant has filed the above titled service appeal before this Honorable Tribunal in which no date has so far been fixed.
2. That, appellant filed the above mentioned service appeal against the impugned service rules dated 24.7.2014 & 24.4.2018 whereby no promotion quota has been allocated for PST Cadre.
3. That, all the three ingredients required for grant of stay are in favor of the appellant.
4. That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained not to fill up the posts of SST (BPS-16) & SST (I.T) from promotion quota till the disposal of the instant service appeal.

APPELLANT

SHEHZAD AHMAD

THROUGH:

NOOR MOHAMMAD KHATTAK

ADVOCATE,

High Court Peshawar



A-6

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
MARDAN

NOTIFICATION

Consequent upon the recommendations of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the post of Primary School Teacher (PST) on school & U/C based in BPS-12 (Rs 7000-500-2000) @ Rs. 7000/- Fixed plus usual allowances as admissible under the rules on adhoc basis for the period of one year under the existing policy of the Provincial Government, in the Teaching cadre on the terms and conditions given below with effect from the date of their taking over charge in the schools as noted against each:-

S/N	NTS Roll.No.	Name	School	U/C	Date of Birth	Total Score	Remarks
1	451704188	ABDUL REHMAN	GPS Pipal NO 1	Alo	16-04-81	120.3	A.V. Post
2	451703478	SHAFI ULLAH	GPS Shaheed Abad	Alo	18-03-83	120.23	A.V. Post
3	451702852	ANWAR ALI	GPS Alo No 2	Alo	12-04-93	113.87	A.V. Post
4	451703166	ZIA U LLAH	GPS Alo No 4	Alo	04-03-90	113.4	A.V. Post
5	451702808	ABRAR KHAN	GPS Alo No 2	Alo	23-01-90	113.03	A.V. Post
6	451700779	ANWAR ZEB	GPS No.1 Alo	Alo	02-05-86	110.41	A.V. Post
7	451704308	NASIR AHMAD	GPS Saida Gul Banda	Babeni	04-04-88	122.6	A.V. Post
8	451703336	KARAM BAZ KHAN	GPS Babuzai No 2	Babuzai	12-01-85	134.59	A.V. Post
9	451703311	FARHAN YOUSAF	GPS Faqir Band	Baghdada	10-04-84	135.07	A.V. Post
10	451700481	MAJID KHAN	GPS Faqir Band	Baghdada	03-02-82	130.63	A.V. Post
11	451703115	TARIO ALI	GPS Faqir Band	Baghdada	01-09-81	123.7	A.V. Post
12	601700752	FAZLI HADI	GPS Jan Abad	Bagh-e-Iram	05-01-87	129.2	A.V. Post
13	451700802	FAZLI ELAHI	GPS Rail Way Station	Bagh-e-Iram	03-06-91	128.18	A.V. Post
14	451703531	SHAHZAD AHMAD	GPS Shaheed Abad Tambulak	Bagh-e-Iram	28-08-91	123.70	A.V. Post
15	451703423	ALAMGEER	GPS No 1 Bul Seri	Baghicha Dheri	31-03-90	101.35	A.V. Post
16	451703437	MUSHTAO ALI	GPS No 1 Bul Seri	Baghicha Dheri	03-05-85	97.7	A.V. Post
17	451702876	MIAN BASEERUD DIN	GPS No 1 Bul Seri	Baghicha Dheri	09-01-90	92.58	A.V. Post
18	451703732	ATIF HUSSAIN	GPS No 1 Bul Seri	Baghicha Dheri	03-02-87	83.43	A.V. Post
19	601703485	HAZRAT ALI	GPS Zubair Dheri	Bakhshali	20-03-83	155.48	A.V. Post
20	451703875	FAYAZ ALI	GPS Bakhshali	Bakhshali	16-01-86	150.44	A.V. Post
21	451704114	FAZLI MALIK	GPS Shaheedan	Bazar	16-04-88	135.84	A.V. Post
22	451700421	HANIF KHAN	GPS Chaingai Baba	Bazar	06-03-81	130.23	A.V. Post
23	451703003	MUHAMMAD ISRAIL	GPS NARAI BAJA	Chamlar	15-12-90	111.26	A.V. Post
24	451704135	ZAHID ALI	GPS Sirkh Dheri No 1	Chargulli	02-04-87	120.55	A.V. Post
25	451704179	MANSOOR ALI	GPS Sirkh Dheri No 1	Chargulli	20-04-92	127.13	A.V. Post
26	451704240	AFSAR ALI	GPS Janai	Chargulli	07-01-85	119.39	A.V. Post
27	451703343	MUHAMMAD FAROOQ	GPS Bandar	Chek Holi	03-01-87	110.57	A.V. Post
28	451704303	SAEED	GPS Nawan Killi	Chek Holi	04-02-89	109.66	A.V. Post
29	451700460	MUHAMMAD ISRAEL	GPS Pani Alla Dad Khel	Chek Holi	10-04-82	107.78	A.V. Post
30	451704226	KHALID	GPS Nawan Killi	Chek Holi	03-12-89	107.57	A.V. Post
31	451702839	SYED KHALID HUSSAIN	GPS Faram Korona	Dagai	31-05-83	131.98	A.V. Post
32	451703112	SYED SIKANDAR SHAH	GPS Kochi Abad	Dagai	08-04-90	127.78	A.V. Post
33	451703904	WISAL AHMAD	GPS Khan Main Killi	Dagai	01-01-85	117.47	A.V. Post
34	451704092	ZIA ULLAH	GPS Khan Main Killi	Dagai	15-04-82	113.48	A.V. Post
35	451703750	ISRAR KHAN	GPS Mazdor Abad	Daman-e-Koh	09-04-89	138.84	A.V. Post
36	451703902	FARMAN ULLAH	GPS Takhl Bhai No 4	Daman-e-Koh	02-04-89	128.52	A.V. Post
37	451704221	NASIR ALI	GPS Takhl Bhai No 4	Daman-e-Koh	04-01-88	125.29	A.V. Post

Shaukat

ATTACHED

7

WFS Roll No.	Name	School	U/C	Date of Birth	Total Score	Remarks
451703747	FARMAN ALI	GPS Zor Mardan	Shamal Pur	05-01-80	129.14	AV Post
451703583	GOHAR RAHMAN	GPS Shawa	Shamozai	05-02-91	140.73	AV Post
451703931	MUSHTAQ AHMAD	GPS Chapal Mardan	Shamozai	04-01-89	140.28	AV Post
451700620	TAHIR ALI	GPS Koli Shah	Shamozai	06-03-85	129.43	AV Post
451703208	JEHANGIR KHAN	GPS Floor Mall Koroona	Sher Garh	04-03-85	127.92	AV Post
451703664	ANWAR ULLAH	GPS Sher Garh No 1	Sher Garh	20-01-82	127.45	AV Post
451703180	MUHAMMAD ZADA	GPS Kala Khel	Toru	12-04-83	126.75	AV Post
451704058	MUHAMMAD RASHID	GPS Toru	Toru	23-04-86	123.91	AV Post


Terms & Condition:


- No TA/DA etc is allowed
- Charge reports should be submitted to all concerned in duplicat.
- Appointment is purely on temporary & adhoc basis initially for one year w.e.f. the date of issue this order
- They should not be handed over charge if they exceed 35 years or below 20 years of age Except S No 42,64,92,98
- Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the Drawing & Disbursing Officer (concerned) and after verification their Dergrees/Certificates should be sent to DEO Male Mardan office for pay release order, in case of fake/bogus Dergrees/Certificates detected later on their appointment order would be automatically canceled from the date of appointment and will be reported to the law enforcing agencies for further action
- Their services are liable to termination on one month prior notice from either side, in case of resignation without notice his one month pay/allowances shall be forfeited to the Government
- They should join their post within 15 days of the issuance of this notification, in case of failure to join the post within 15 days of issuance of this notification, their appointment will be consider as cancelled and no subsequent appeal etc shall be entertained.
- Health and Age Certificate should be produced from the Medical Superintendent cocerned before taking over charge.
- They will be governed by such rules and regulations as may be issued from time to time by Govt.
- Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period
- Their appointment is made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- Before handing over charge once again their documents may be checked if they do not possess the required relevant qualification, they may not be handed over charge

(HANIF ULLAH)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endsl No: 2154/G NTS Appointment File /Dated 28/3/2015

- Copy Forwarded for information and necessary action to the following :
- PS to Minister for Elementary and Secondary Education Khyber Pakhtoonkhwa Peshawar.
 - PS to the Secretary to Govt: Khyber Pakhtoonkhwa E&SE Department Peshawar.
 - Director Elementary and Secondary Education Khyber Pakhtoonkhwa Peshawar.
 - District Accounts Officer Mardan.
 - SDEOs (Male) Mardan & Takht Bhai.
 - Official Concerned
 - M-File


DISTRICT EDUCATION OFFICER
(MALE) MARDAN

5


(2)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MARDAN**



Notification.

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No:1 of 2018), Services of the following Primary School Teachers appointed on adhoc basis on Contract, are hereby regularized in BPS-12, on the same posts in Teaching Cadre on the terms and condltion given below with effect from the date of their appointment on the PST post :-

Appointment 2015

Sr	Roll No	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
1	451703402	Muhammad Tayyab ur Rahman	VPO Gujrat MARDAN	121.39	GPS Gujrat	2154/G dated 28-03-2015	2450/G dated 05-04-2016
2	451703069	Sareer Ur Rahman	VPO Gujrat MARDAN	123.95	GPS Gujrat	2154/G dated 28-03-2015	2450/G dated 05-04-2016
3	451700537	Basharat Elahi	VPO Gujrat MARDAN	124.26	GPS Gujrat	2154/G dated 28-03-2015	2450/G dated 05-04-2016
4	451702895	Manir Khan	VPO Gujrat MARDAN	127.3	GMPS Sada Bahar	2154/G dated 28-03-2015	
5	451704179	Munoor Ali	Surkh DHERI, RUSTAM	127.13	GPS CHARGULLI	2154/G dated 28-03-2015	2450/G dated 05-04-2016
6	451704240	Afsar Ali	Khalrabad RUSTAM	119.39	GPS Janay	2154/G dated 28-03-2015	2450/G dated 05-04-2016
7	451704178	Imran Khan	VPO Fatima MARDAN	114.81	GPS Jamra	2154/G dated 28-03-2015	2450/G dated 05-04-2016
8	451703685	Ayaz Ali	VPO Afzal Abad MARDAN	115.13	GPS Jamra	2154/G dated 28-03-2015	2450/G dated 05-04-2016
9	451703875	Fayaz Ali	VPO Bakhshali	150.44	GPS Bakhshali	2154/G dated 28-03-2015	2693/G dated 18-04-2017
10	451703784	Muhammad Inam	VPO Gaddar MARDAN	123.74	GPS Gaddar 1	2154-G dated 28-03-2015	2450/G dated 05-04-2016
11	451700459	Amanullah	VPO Gaddar MARDAN	118.4	GPS Gaddar 1	2154-G dated 28-03-2015	2450/G dated 05-04-2016
12	451703645	Sabir Ali	VPO Gaddar MARDAN	117.67	GPS Gaddar 1	2154-G dated 28-03-2015	2450/G dated 05-04-2016
13	451704308	NASAR AHMAD	HUSSAIN ABAD SHANKAR	122.6	GMPS SAIDA GUL KILLI	2154-G dated 28-03-2015	2450/G dated 05-04-2016
14	451700489	Bakht Afsar	VPO Gujrat MARDAN	114.55	GPS Tekadar Killi	4224/G dated 18-06-2015	5680/G dated 13-06-2017
15	451700519	TARIQ ZAMAN	VPO Babeni MARDAN	135.16	GPS SAJID AKBAR KILLI	4224-G dated 18-06-2015	5680/G dated 13-06-2017
16	451700743	Ihsan Ali	Tariq Abad-Kata khat	113.38	GPS Bakhshali	5676/G dated 29-08-2015	
17	451703215	WAHAB GUL	VPO GD ZAI MARDAN	118.77	GPS GD ZAI #1	2154/G,28-3-2015	2450/G, 05-4-2016
18	451702995	HUSSAIN AHMAD	VPO GD ZAI MARDAN	125	GPS GD ZAI #2	2154-G, 28-3-2015	2450/G, 05-4-2016

ATTACHED

19

114	451704092	Zia Ullah	VPO Dagal Mardan	113.48	GPS Khan Mian Killi Madan	2154/G 28/03/2015	2693/G 18/04/2017
115	451703904	Wisal Ahmad	Fazal Abad Mardan	117.47	GPS Khan Mian Killi Madan	2154/G 28/03/2015	2693/G 18/04/2017
116	451700542	Jamal Halder	Bagh Killi Mardan	114.51	GPS Khanjar Mardan	2154/G 28/03/2015	2450/G 5/4/2016
117	451703112	Syed Sikandar Shah	VPO Dagal Mardan	127.78	GPS Kochi Abad	2154/G 28/03/2015	2693/G 18/04/2017
118	451700735	Shahid ur Rahman	Sharif Abad Board Mardan	114.99	GPS Labour colony	2154/G 28/03/2015	2693/G 18/04/2017
119	451700466	Ahmad Ali Khan	16101-5781457-5 Khora Banda Mardan	128.13	GPS Labour colony	2154/G 28/03/2015	2693/G 18/04/2017
120	451704167	Muhammad Jamal	Labour Colony Mardan	119.34	GPS Mistri Abad NO 2	2154/G 28/03/2015	2693/G 18/04/2017
121	451703991	Muhammad Rizaz	Muhabat abad	118.45	GPS Mohabat Abad	2154/G 28/03/2015	2693/G 18/04/2017
122	451703003	Muhammad Israil	Rag Narai	111.26	GPS Narai Baja	2154/G 28/03/2015	2693/G 18/04/2017
123	451704165	Zawar Khan	Khan pur Mangah	126.25	GPS NO 1 Khazana Dheri	2154/G 28/03/2015	2693/G 18/04/2017
124	451703842	Tauseef Ahmad	Qudrat Kill Mardan	118.52	GPS NO 2 Kandary Mardan	6795/G 14/10/2015	4858/G 14/10/2017
125	451700802	Fazli Elahi	Danish Colony Mardan	128.18	GPS Railway Station Mardan	2154/G 28/03/2015	5409/G 07/06/2017
126	451703371	MUHAMMAD ABBAS	Mistry Abad Mardan	121.65	GPS Roria Jadeed Mardan	2154/G 28/03/2015	2450G 05/04/2016
127	451703531	Shehzad Ahmad	Tambulak Mardan	123.29	GPS Saeed Abad	2154/G 28/03/2015	5807/G 17/06/2017
128	451702924	Abdul Baseer	VPO Manga Mardan	130.1	GPS Sallm Khan	2154/G 28/03/2015	2693/G 18/04/2017
129	451702868	Hashmat Ali	Mirwas Manga Mardan	126.7	GPS Sarnar Kand Korrona	2154/G 28/03/2015	2693/G 18/04/2017
130	451704163	Muhammad Adeel Gul	VPO Mangah Mardan	130.35	GPS Sarinjam Killi	2198/G 31/03/2015	2693/G 18/04/2017
131	451703082	Muhammad Ismail	Sheikh Yousaf Mardan	128.38	GPS Shaikh Yousaf	2154/G 28/03/2015	2693/G 18/04/2017
132	451703341	Muhammad Asad	Muhabat Abad Mardan	103.96	GPS Sher Pur	2154/G 28/03/2015	2693/G 18/04/2017
133	451703443	Nauin	VPO Ghalla Dher	116.87	GPS Usman Ghani Banda	2154/G 28/03/2015	2693/G 18/04/2017
134	451700572	Inayat ur Rahman	sheikh yousaf Mardan	109	GPS Koragh	2154/G 28/03/2015	
135	451703103	AZIZ KHAN	VILL PATORAK Katlang	108.99	GPS KHURSHED ABAD	2154.G 28.3.15	
136	451700732	TAHIR ALI	VILL MANDO KHEL Katlang	117.19	GPS NO1 SAWAL DHER	2154.G 28.3.15	2693.G 18.4.17
137	451702817	AKHTAR ZEB	VILL JAMAL GHARI Katlang	103.02	GPS DARMANDOMA	2154.G 28.3.15	2693.G 18.4.17
138	451703267	MUHAMMAD ZEESHAN	VILL JAMAL GHARI Katlang	93.21	GPS GUL BAHAR	2154.G 28.3.15	2693.G 18.4.17
139	451703336	KARAM BAZ KHAN	VILL BABOZE Katlang	134.59	GPS NO 2 BAHOZI	2154.G 28.3.15	2693.G 18.4.17
140	451700387	SAJJAD ALI	VILL ALO Katlang	105.24	GPS NO 1 PEPAL	4465.G 27.6.15	8979.G 19.10.17
141	451703201	SANAULLAH	VILL SHAKAR TANGI PO KTLANG	116.91	GPS NO1 INZARGAI	2154.G 28.3.15	2693.G 18.4.17
142	451703601	YASIR ALI	VILL Munawar Khan	132.93	GPS MUNAWAR KHAN	2154.G 28.3.15	2693.G 18.4.17
143	451700844	ARSHAD ALI	VILL Adda KATLANG	124.09	GPS ADDA	2154.G 28.3.15	2693.G 18.4.17
144	451703433	SAJJAD ALI	VILL SHERO katlang	110.26	GPS NO 1 INZARGI	2154.G 28.3.15	2693.G 18.4.17
145	451703936	IBRAR HUSSAIN	VILL TAZA GRAM katlang	132.81	GPS QASMI	2154.G 28.3.15	2693.G 18.4.17
146	451704136	SHARIF GUL	VILL LUIND KHWAR	142.93	GPS SAROBI	2154.G 28.3.15	2693.G 18.4.17
147	451702984	SAJJID IQBAL	VILL TAZA GRAM katlang	130.82	GPS SAROBI	2154.G 28.3.15	2693.G 18.4.17
148	451703970	Akhtar Ali	VILL QASMI katlang	123.55	GPS KANDAOO CHAIL	2154.G 28.3.15	2693.G 18.4.17

ATTACHED

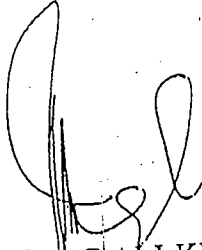
149	15170428	SUBHAN UDDIN	VILL JANGA 1katlang	117.18	GPS JANGA BALA	4224.G 18.6.15	8979.G 19.10.17
150	451703166	ZIA ULLAH	VILL ALO katlang	113.4	GPS ALO NO 4	2154.G 28.3.15	2693.G 18.4.17
151	451703478	SHAFI ULLAH	VILL GHALA katlang	120.23	GPS SHAHEED ABAD	2154.G 28.3.15	2693.G 18.4.17
152	451702808	IBRAR KHAN	VILL GHALA katlang	113.03	GPS NO2 ALO	2154.G 28.3.15	2693.G 18.4.17
153	451700779	ANWAR ZEB	VILL ALO katlang	110.41	GPS NO 1 ALO	2154.G 28.3.15	2693.G 18.4.17
154	451702852	ANWAR ALI	VILL ALO katlang	113.87	GPS NO 2 ALO	2154.G 28.3.15	2693.G 18.4.17
155	451703900	ASAD ALI	VILL SAWAL DHER katlang	117.96	GPS NO 1 GULI BAGH	2154.G 28.3.15	2693.G 18.4.17
156	601703931	MUSHTAQ AHMAD	VILL CHAPAL ABAD katlang	140.29	GPS CHAPAL ABAD	2154.G 28.3.15	2693.G 18.4.17
157	451700620	TAHIR ALI	VILL CHAPAL ABAD katlang	129.43	GPS KOTI SHAH	2154.G 28.3.15	2693.G 18.4.17
158	451700715	ABDUR RAHIM	VILL SANGAOD katlang	113.93	GPS MIAN KHAN	2154.G 28.3.15	2693.G 18.4.17
159	451703279	MUHAMMMAD AMIN	VILL MIAN KHAN katlang	109.84	GPS SANGAOD NO 1	2154.G 28.3.15	2693.G 18.4.17
160	451700429	UMAID KHAN	VILL IKRAM PUR katlang	131.7	GPS IKRAM PUR	2154.G 28.3.15	2693.G 18.4.17
161	451703997	FAZAL WADOOD	VILL GULI BAGH katlang	119.13	GPS UMAR ABAD	2154.G 28.3.15	2150.G 5.4.16
162	451703273	AMINUL HAQ	VILL IKRAM PUR katlang	134.14	GPS IKRAM PUR	2154.G 28.3.15	2693.G 18.4.17
163	451703967	ANIAZ ALI	VILL SAWAL DHER katlang	138.71	GPS GLARGO CHAIL	2154.G 28.3.15	2693.G 18.4.17
164	451703583	GOHAR REHAMN	VILL CHAPAL ABAD katlang	140.73	GPS SHAWA	2154.G 28.3.15	2693.G 18.4.17
165	451703388	Rashid Ali	Kotarpan Rustam	121.11	GPS Kotarpan	2154/G 28/3/2015	2693/G 18/4/2017
166	451704114	Fazil Mallk	VPO Shaheedan. Rustam	135.8	GPS Shaheedan	2154/G 28/3/2015	2693/G 18/4/2017
167	451700421	Hanif Khan	Chingay Baba Rustam	130.33	GPS Chingay Baba	2154/G 28/3/2015	2693/G 18/4/2017
168	451700729	Muhammad SOHAİL KAMAL	VPO PAR HOTI MARDAN	112.58	GPS PAR HOTI	2154/G 28-03-2015	

TERMS & CONDITIONS:

1. The regularization will not be in favor of those, who have not taken over charge or has remained absent from duty or resign from service and also not for those who are under disciplinary proceedings.
2. They will be governed by such rules and regulations as may be Issued from time to time by the Govt.
3. The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other

persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

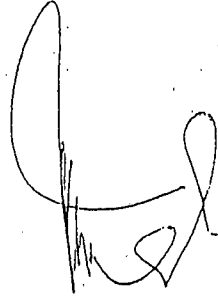
4. The seniority inters of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

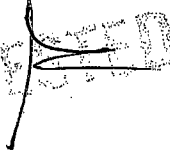

(IJAZ ALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Ends No. 2239/6 : Dated. 15-3 /2018

Copy forwarded for information to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary E&SE Khyber Pakhtunkhwa Peshawar.
3. Director E&SE Khyber Pakhtunkhwa Peshawar.
4. District Accounts Officer Mardan.
5. SDEO(M) MARDAN/TAKHT BHAI/KATLANG
6. Official Concerned.


DISTRICT EDUCATION OFFICER
(MALE) MARDAN



S. No. 170525

Roll No.

Group 97441

Science

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



MARKS IMPROVED

Board of Intermediate and Secondary Education
Mardan N.W.F.P. Pakistan
SECONDARY SCHOOL CERTIFICATE

SESSION 2008 - Annual

This is to certify that SHAHZAD AHMAD Son of WALIMAN KHAN
and resident of District Mardan has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education
Mardan held in April / May, 2008 as a Private candidate. He obtained 580 marks out of 900 and has been placed
in Grade B representing Very Good. The candidate passed the following subjects:

1. English 2. Urdu 3. Islamiyat (Comp) 4. Pakistan Studies 5. Mathematics 6. Physics 7. Chemistry 8. Biology

His date of birth according to admission form is (in Figures) 28.03.91 (in Words) 28th August N/H Ninety One.

Kashifullah
Asstt. Secretary

Attested

Fazli Elahi

Issued in lieu of certificate bearing Roll No. 3840 Session SSC (A) 2007.

S.T. (M)
H.S.S. No 1 Bicket Gunj
Mardan.

This certificate is issued without alteration or erasure.

Suleman
Secretary

S. No. 095605
Roll No. 1947
Group Pre-Engineering

13



MARKS IMPROVED

Board of Intermediate and Secondary Education
Mardan N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION

SESSION 2009 - Supplementary

This is to certify that SHAHZAD AHMAD Son of WALI MAN KHAN
and resident of District Mardan Registration No. 127-BIANSI-2007 has passed the Intermediate
Examination of the Board of Intermediate & Secondary Education, Mardan held in NOV / DEC, 2009
as a Private candidate. He obtained 671 Marks out of 1100 and has been placed in
Grade B Representing Very Good

[Signature]
Asstt. Secretary

Issued in lieu of certificate bearing Roll No. 37750 Session HSSC (A) 2009.

Attested

[Signature]
Secretary

Fazli Elahi

This certificate is issued without alteration or erasure.

SST (Sci) 895-16
G.H.S.S. No. 1 Bicket Gunj
Mardan

Serial No. 000139

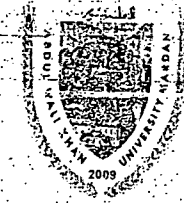
Abdul Wali Khan University

Mardan, Pakistan

Reg. No. 09-AWKUM-PC/M-728

Roll No. 10206

14



The University in recognition of the fulfilment of prescribed requirements has conferred upon

Mr. / Ms. SHAHZAD AHMAD Son / Daughter of WALIMAN KHAN

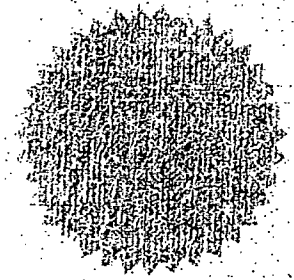
The Degree of

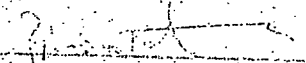
BACHELOR OF SCIENCE


in the examination held in Dec 2011 session Annual 2010-11

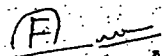
He / She was placed in -SECOND- Division / Grade / CGPA

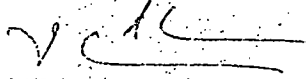
The examination was taken as ~~a whole~~ / in Parts.




Controller of Examinations


Registrar

Attested

Fazli Elahi
SST (Sci) 51-5-16
G.H.S.S, No.1 Bicket Gunj
Mardan


Vice Chancellor

Result Declaration Date 07-02-2012

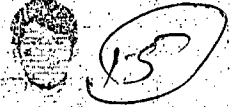


S.No. 143

BACHA KHAN UNIVERSITY

CHARSADDA, PAKISTAN

TRANSCRIPT



Programme: M.Sc Computer Science

Name:	Shahzad Ahmad	Semester	GPA	CGPA	Cumulative Cr.Hrs.
F/Name:	Wali Man Khan	I	3.00	3.00	18
Reg. No:	2012-BK-409	II	3.17	3.08	36
Enrol. No:	19	III	3.58	3.25	54
Session:	2012-14	IV	3.75	3.38	72

1st Semester							
Course Code	Course Title	Obtained Marks	Grade	Value	Cr.Hrs.	Grade Point	GPA
MSC111	Technical & Business Writing	70	B	3.00	3	9.00	3.00
MSC112	Object Oriented Programming	65	C+	2.50	3	7.50	
MSC113	ICT	66	C+	2.50	3	7.50	
MSC114	Web Fundamentals	85	A	4.00	3	12.00	
MSC115	Data Communication	75	B	3.00	3	9.00	
MSC116	Digital & Logic Design	76	B	3.00	3	9.00	

2nd Semester							
Course Code	Course Title	Obtained Marks	Grade	Value	Cr.Hrs.	Grade Point	GPA
MSC121	Web Engineering-I	65	C+	2.50	3	7.50	3.17
MSC122	Computer Architecture	82	B+	3.50	3	10.50	
MSC123	Database-I	72	B	3.00	3	9.00	
MSC124	Data Structure	80	B+	3.50	3	10.50	
MSC125	Computer Networks	71	B	3.00	3	9.00	
MSC126	Software Engineering-I	77	B+	3.50	3	10.50	

3rd Semester							
Course Code	Course Title	Obtained Marks	Grade	Value	Cr.Hrs.	Grade Point	GPA
MSC231	Analysis of Algorithms	79	B+	3.50	3	10.5	3.58
MSC232	Artificial Intelligence	80	B+	3.50	3	10.5	
MSC233	Database-II	81	B+	3.50	3	10.5	
MSC234	Theory of Automata	89	A	4.00	3	12.0	
MSC235	Operating System	85	A	4.00	3	12.0	
MSC236	Software Engineering-II	72	B	3.00	3	9.0	

4th Semester							
Course Code	Course Title	Obtained Marks	Grade	Value	Cr.Hrs.	Grade Point	GPA
MSC241	Visual Programming	75	B	3.00	3	9.00	3.75
MSC242	Compiler Construction	77	B+	3.50	3	10.50	
MSC243	Wireless Networks	91	A+	4.00	3	12.00	
MSC244	Computer Graphics	85	A	4.00	3	12.00	
MSC245	Project (Personal Computer Based Electric Appliances Control and Surveillance System)	175	A	4.00	6	24.00	

Errors and omissions, if any, are subject to subsequent rectification.

Result Declaration Date: 20th October, 2014

Issuance Date: 14th April, 2015

Assistant Controller
of Examinations (Secrecy)

Attested
Fazli Elahi
SST (Sci) B.S-16
C.H.S.S. No-1 Bicket Gunj
Wardan

Controller of Examinations
Bacha Khan University, Charsadda

Prepared by: Shakir Jan

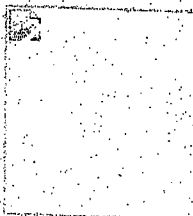
:: Detail Result

157A

Online Web-Based Provisional Certificate Completer Semester Spring 2013

Result Completer Detail

Name: SHAHZAD AHMAD DMC No: 600165
Father Name: WALI MAN KHAN Programme: B.Ed
Roll No: ar641326 Reg No: 09NMN02202
Address: NEW BAGH IRUM MARDANBAGH E IRUM ROAD
Tehsil: MARDAN District: MARDAN



COURSE CODE	COURSE TITLE	CONFLATED MARKS	GRADE
Autumn: 2012			
0512	PERSPECTIVES OF EDUCATION	60	B
0513	SCHOOL ORGANIZATION	70	A
0514	EVALUATION, GUIDANCE & RESEARCH	73	A
0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	67	B
0651	ENGLISH (COMPULSORY)	63	B
0652	ISLAM, PAKISTAN AND MODERN WORLD	55	C

Spring: 2013

ATTACHED

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. 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

TESTED

1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>recruitment; and (b) fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and (b) fifty percent by initial recruitment"; and</p>
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(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>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A. Education or equivalent qualifications from a recognized University.</p>	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-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

(18)

A

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Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:

INTERS

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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;

(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:

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;

(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:

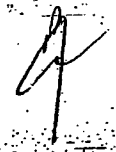
Provided that if no suitable candidate is available from amongst

ATTESTED

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			<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



(22)

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

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

(7)

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EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P11
G A Z E T T E

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
1	Subject Specialist- Information Technology (SS-IT) (BPS-17)	<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 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 Secondary School Teacher-IT with at least five years service; and</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>

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2. Secondary School Teacher-Information Technology (SST-IT) (BPS-16)	<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>
3. Certified Teacher-Information Technology (CT-IT) (BPS-12).	<p>i. At least 2nd Division Intermediate School Certificate or equivalent qualification from a recognized Institution or Board with one year Diploma in Information Technology Computer Science from any recognized institution; and</p> <p>ii. Certified Teacher Certificate (CT) or Associate Degree in Education (ADE) from any recognized institution/ University.</p> <p>Note: A candidate did not have the qualification under clause (i), shall acquire the same within three years from the date of his/her appointment.</p>	18-35	By initial recruitment.

50% CT (IT)

50% Fresh

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

ATTENDED

ATTENDED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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Subject: MINUTES OF THE MEETING OF THE SSRC REGARDING ALLOTMENT OF 50% QUOTA TO SST (GEN/SC) FOR PROMOTION TO THE POST OF SS-IT

Meeting of the SSRC regarding the subject matter was held under the Chairmanship of Secretary Elementary & Secondary Education Department on 10/08/2017 at 11:00 am in the committee room of this Department. The following Officers/Officials of the concerned Department/attached Department attended the meeting.

The following attended the meeting:-

1. Dr. Shalhzad Khan Bangash, Secretary E&SE Department (In Chair)
2. Mr. Qaisar Alam, Special Secretary (Dist.) E&SE Department.
3. Mr. Muhammad Rafiq Khattak, Director E&SE, Peshawar.
4. Mr. Muhammad Shoaib, Deputy Secretary (A), E&SE Department
5. Mr. Javed Siddique, Deputy Secretary (R) Finance Department.
6. Mr. Nalik Muhammad, Section Officer (Primary) E&SE Department.
7. Mr. Mohsin Mushfaq, Assistant (R-1) E&AD Department.

2. The forum was informed that E&SE Department vide Notification No. SOG/E&SED/1-86/SS.IT/2016 of E&SE Department Peshawar dated 15.08.2016 has notified the nomenclature of Information Technology Teaching Cadre/Posts serving in the Government High & Higher Secondary Schools of Khyber Pakhtunkhwa of E&SE Department, as Subject Specialist-IT (SS-IT/Computer Science) BPS-17 (Annex-A). Further E&SE Department vide Notification No. SO (PE)4-5/SSRC/Meeting/ 2013/ Teaching Cadre: dated 24/07/2014 has approved promotion to SS posts (BPS-17) from SST (BPS-16). The SST regular having 50% quota of the total sanctioned SS posts allotted for promotion (Annex-B). 50% quota has already been allotted for SSTs (General/Science) in 12 different subjects for Subject Specialist Post. But unfortunately, SSTs (General/Science) who have M.Sc (Computer Science)/BS (CS)/MIT qualification and are eligible for promotion to the post of SS (IT) B-17 have no quota for promotion.

3. In light of the above facts, this Department, therefore, proposed that all those SSTs (General/Science) who have M.Sc. (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS (IT) B-17 like other SSTs, so as to bring uniformity in the teaching cadre.

4. In the above context, the service rules/structure of SST (General/Science) & SST (IT) were approved as tabulated below:-

ATTESTED

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

Nomenclature of the post	Minimum Qualification for appointment by initial	Age Limit	Method of recruitment
Subject Specialist-Information Technology (SS-IT) (B-17)	i) Master Degree in Computer Science/IT at least in 2 nd Division or equivalent qualification from any recognized University.	21-35	a) Fifty percent by promotion on the basis of seniority-cum-finesse from amongst the Secondary School Teacher (SS) with at least five years' service AND Secondary School Teacher (General/Science) possessing master degree in IT or equivalent qualification with 05 years' experience. b) Fifty percent by initial recruitment.
Government/ Govt. Schools/ Govt. Comprehensive High Schools and other equivalent posts in the Teaching Cadre.	ii) Bachelor Degree of Education (B.Ed) at least in 2 nd Division from any recognized University.		Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment.
Secondary School Teacher (SST-IT) (B-16)	i) Bachelor Degree with the subject of Computer Science at least in 2 nd Division (equivalent from any recognized institution.	21-35	a) Fifty percent by promotion on the basis of seniority-cum-finesse 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.
Government/ Govt. High/ Higher Secondary Schools	ii) Bachelor Degree of Education (B. Ed) at least in 2 nd Division from any recognized institution.		Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment.
Junior Teacher-Information Technology (JT-IT) (B-12)	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.

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DECISIONS:

The following decisions were made in consensus:-

- i. The proposed amendments in the service rules/structure as depicted in the above table was approved.
- ii. Nomenclature of the post of CT(IT) was changed as Junior Teacher Information Technology (JT-IT)
- iii. Seniority of SST (General/Science) & SST (IT) will be clubbed together immediately for the purpose of promotion in light of the above amended service rules for the post of SST (General/Science) & SST (IT) to the post of SS(IT/Computer Science)

The meeting ended with vote of thanks to/from the Chair. !

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 (Javed Siddique)
 Deputy Secretary (R), Finance Department

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 06/09/17
 (Mohsin Mushtaq)
 Assistant (R-I), E&AD Deptt:

[Handwritten signature]
 Naik Muhammad
 Section Officer (Primary), E&SE Department

[Handwritten signature]
 Muhammad Shoaib
 Deputy Secretary (A), E&SE Deptt:

[Handwritten signature]
 (Mohammad Rafique Khattak)
 Director, E & SE, Peshawar

[Handwritten signature]
 (Qaiser Alam)
 Special Secretary, E&SE Deptt:

[Handwritten signature]
 12/9/17
 Dr. Shahzad Khan Bangash
 Secretary E&SE Department
 (Chairman)

ATTENDED

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**GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

28

Dated: Peshawar, the August 15, 2018

SANCTION

No. SGRB&A/II-18/2018/IT Teacher. Sanction of the Government of Khyber Pakhtunkhwa, is hereby accorded to the creation of posts of Senior IT Teacher (BS-17), IT Teacher (BS-16) and Computer Lab Incharge (BS-12) for the Government High & Higher Secondary Schools in Khyber Pakhtunkhwa, w.e.f. 08-01-2018 as per detail given below, subject to the observance of all codal formalities before incurrence of expenditure.

Description	Designation of posts	No. of Posts	Remarks
*150159-Establishment of 500 IT Labs in Govt. High & Higher Secondary Schools in Khyber Pakhtunkhwa	Senior IT Teacher (BS-17)	27	List of schools with their names printed on the back side.
	IT Teacher (BS-16)	172	
	Computer Lab Incharge (BS-12)	368	
*160151-Establishment of 500 IT Labs in Govt. High Schools in Khyber Pakhtunkhwa (Phase-III)	IT Teacher (BS-16)	451	
	Computer Lab Incharge (BS-12)	458	
Total		1476	

2. The expenditure involved is debit to the Functional-cum-object classification 09-Education Affairs and Services 092-Secondary Education Affairs and Services 0921-Secondary Education Affairs and Services 092101-Secondary Education A01-Employees Related Expenses and shall be met out from within the Account-IV.

Secretary to Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education Deptt.

Endst. No: BOV/FD/2-38/2018-19

Dated Pesh: the 10 / 10 / 2018

Copy of above is forwarded to:

1. The Accountant General Khyber Pakhtunkhwa.
- 2-26. All the District Accounts Officers in Khyber Pakhtunkhwa _____

**BUDGET OFFICER-V
FINANCE DEPARTMENT**

Endst. of even number & date.

Copy forward for information to the:-

1. The Budget Officer-V, Finance Department, Govt. of Khyber Pakhtunkhwa.
2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa with the request to circulate the same to all the District Education Officers (M/F).
3. The Project Manager-II/Deputy Director (EMIS), E & S Education Department.
4. All the Deputy Commissioners in Khyber Pakhtunkhwa.
5. Master File.

ATTESTED

**(MURTAZA KHAN)
SECTION OFFICER (BUDGET)**

29

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) CST	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 years	1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner: (a) Twenty percent by promotion on the basis of seniority-cum-fitness from amongst the Certified Teacher-IT with at least five years' service and having the qualification prescribed for the post of Secondary School Teacher-IT Provided that if no suitable candidate is available for promotion then by initial recruitment: (b) Twenty percent by promotion on the basis of seniority-cum-fitness from amongst the Senior Certified Teachers (BPS-16) with at least five years' service as Senior Certified Teacher and Certified Teacher and having the qualification mention 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: (c) Four percent from amongst the Senior Drawing Master (BPS-16), with at least five-years service as senior Drawing Masters and drawing Masters and having qualification mentioned in column No.3: Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters, with at least five years service as such and having qualification mentioned in column No.3:

ATTESTED

20%
CT-IT

CT
20%

4%
DM

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				<p>(d) Four percent from amongst the Senior Arabic Teachers (BPS-16), with at least five years service as senior Arabic Teachers and Arabic Teachers and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification mentioned in column No.3:</p> <p>(e) Four percent from amongst the Senior Theology Teachers (BPS-16), with at least five years service as senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</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>(f) Three percent from amongst the Senior Qaris Teachers (BPS-16), with at least five years service as Senior Qaris Teachers and Qaris Teachers and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Qaris Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Qaris Teachers, with at least five years service as such and having qualification mentioned in column No.3:</p> <p>(g) Twenty percent from amongst the Primary Head Teachers (BPS-16), with at least seven years service as Primary Head Teachers and Senior Primary Teachers and Primary Teachers and having</p>
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AT 47

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3 1/2 Q.A

20% PST

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qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst 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:

Provided further that if no suitable candidate is available from amongst Senior Primary Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers, with at least seven years service as and having qualification mentioned in column No.3: and

(ii) twenty five percent by initial recruitment.

NOTE:

- 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
- II. Post of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately."

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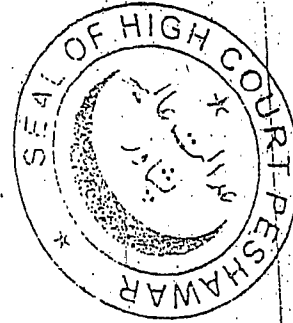
(32)

JUDGMENT SHEET
PESHAWAR HIGH COURT PESHAWAR
JUDICIAL DEPARTMENT

W.P. No.596-P/2019

Muhammad Raees Gul and another
Vs.

Government of Khyber Pakhtunkhwa through
Chief Secretary Khyber Pakhtunkhwa;
Peshawar and 06 others



JUDGMENT

Date of hearing 03.09.2020

Mr. Zahid Ullah Zahid, Advocate, for the petitioners.

Mr. Arshad Ahmad Khan, AAG, for the Provincial Government, a/w Mr. Jehangir Khan, AD (Litigation), Directorate of E&SED, Peshawar and Mr. Dawood Khan, ADO, office of DEO, Peshawar.

Mr. Aftab Khan, Advocate, for the private respondent No.7.

IAZ, ANWAR, J. Muhammad Raees Gul and another, petitioners herein, through the instant Constitutional petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, have prayed for the following relief:-

"It is, therefore, most graciously prayed that while allowing this writ petition, an appropriate writ may kindly be issued by declaring the act of omitting the subject of

ATTESTED
EXAMINER
Peshawar High Court

ATTESTED

Computer Science from promotion to the post of SST is illegal, unlawful, discriminatory and without lawful authority with the direction to consider and include the subject of Computer Science in the criteria for promotion to the post of SST.

Any other relief though not specifically asked for to which the petitioner is found entitled in the circumstances may also be granted".

2. Keeping in view the averments made in the instant petition, comments were called from the respondents who furnished the same accordingly, wherein, they opposed the issuance of desired writ, as prayed for.

3. Arguments heard and record perused.

4. Perusal of the record reveals that petitioners have called in question the recruitment rules notified vide Notification dated 24.07.2014; whereby, according to them, the incumbents, holding the posts of Primary School Teacher (BPS-12) with qualification of

ATTESTED

EXAMINER
Peshawar High

ATTESTED

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Compute Science, are not included in the
feed cadre for the post of Senior Science
Teacher (BPS-16).

5. Learned counsel for the
petitioners has laid much stress upon the
discrimination so meted out to the
petitioners and also about depriving them
from future prospect of promotion, albeit,
we are of the view that questioning the
vires of rules purely relates to the terms
and conditions of service, for which the
proper forum is Khyber Pakhtunkhwa
Service Tribunal established under the
Khyber Pakhtunkhwa Service Tribunals
Act, 1974. Besides, the jurisdiction of
this Court is barred under Article 212 of
the Constitution of Islamic Republic of
Pakistan, 1973. In this regard, reference
can be made to the cases of "L.A. Sherwani
and others (1991 SCMR 1041)"; "Ali
Azhar Khan Baloch (2015 SCMR 456)"
and "Mobeen-ul-Salam (2006 SCMR
100)".

6. Thus, for the reasons recorded
hereinabove and in view of the bar

ATTESTED

EXAMINER
Peshawar High Court

ATTESTED

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contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 and also in view of the availability of alternate remedy to the petitioners, this writ petition is not maintainable. Accordingly, it is dismissed in limine. Needless to observe, that petitioners may approach to the Khyber Pakhtunkhwa Service Tribunal, Peshawar for the redressal of their grievance, if they are so advised.

Announced
Dt: 03.09.2020

JUDGE

JUDGE

(D) Hon'ble Justice Ikramullah Khan and Hon'ble Mr. Justice Ijaz Ahmad

22/09/2020

6285
 Date of Presentation of Application: 3/9/2020
 No of Pages: 11-7
 Copying:
 Total: 174
 Date of Preparation of copy: 7/9/2020
 Date of Delivery of copy: 7/9/2020
 Received By: [Signature]

[Signature]
 CERTIFIED TRUE TO THE COPY
 07 SEP 2020

RECEIVED

[Signature]

To,

The Director,
E&SE Department,
Khyber Pakhtunkhwa, Peshawar

F-36

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED SERVICE RULES DATED 24.07.2014 AND 24.04.2018 WHEREBY NO PROMOTION QUOTA HAS BEEN ALLOCATED FOR THE CADRE OF PST & CT (WHOSE SUBJECTS IN B.SC ARE COMPUTER SCIENCE).

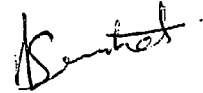
Respected Sir,

Most respectfully it is stated that I am the employee of your good self-Department and performing my duty as PST at GPS Saeed Abad, District Mardan quite efficiently and upto the entire satisfaction of my superiors. It is pertinent to mention here that all the other Primary School Teachers and Certified Teachers have the promotion criteria/quota to the post of SST, SST (General & Science). That service rules dated 24.07.2014 and 24.04.2018 framed by the respondent Department no promotion quota has been allocated for promotion from the post of PSTs and CTs (who has the qualification of B.Sc in Computer Science) to the post of SST/SST (IT). That the undersigned feeling aggrieved from the service rules mentioned above preferred this Departmental appeal before your good self.

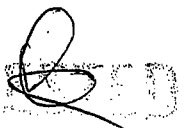
It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned service rules Notified on 24.07.2014 may very kindly be amended/modified to the extent of Serial No.1B column No.3 of the table by including/inserting the computer science subject of the appellant in column No.3 and the impugned service rules dated 24.04.2018 may kindly be amended/modified to the extent of Serial No.2 n column No.5 of the table by allocating promotion quota for the cadre of PST and CT. Any other remedy which your good self deems fit that may also be awarded in favor of the applicant.

Dated: 20.10.2020

Your Obediently



SHEHZAD AHAMD, PST
GPS Saeed Abad, District Mardan

ATTACHED 

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

_____ OF 2021

Shehzad Ahmad

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt v

(RESPONDENT)
(DEFENDANT)

I/We Shehzad Ahmad

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021

Shehzad Ahmad

CLIENT(S)

ACCEPTED

NOOR MOHAMMAD KHATTAK

15401-0705985-5

BC-08-0853

&

KAMRAN KHAN

AFRASIAB KHAN WAZIR

Haider Ali
HAIDER ALI

ADVOCATES

OFFICE:

Flat No.4, Upper Floor,

Juma khan plaza near (FATA) Secretariat

Warsak road Peshawar.

Mobile No. **0345-9383141**