


11.10.2022

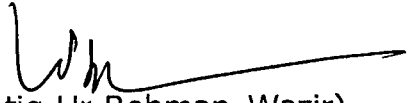
Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional AG for respondents present.

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.

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)

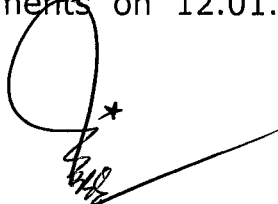
  
Appellant Deposited  
Security & Process Fee

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.

(b) 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.

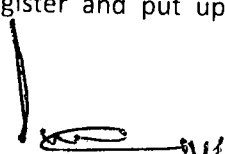



  
Chairman

Form- A

## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ /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 20<sup>th</sup> 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. 2395 / 2021

**JUNAID AHMAD JAMI**

**VS**

**EDUCATION DEPTT**

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**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**

OFFICE: Flat No.4, 2<sup>nd</sup> Floor,

Juma Khan Plaza,

Near FATA Secretariat,

Warsak Road, Peshawar.

0345-9383141.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**



**APPEAL NO. \_\_\_\_\_/2021**

Mr. Junaid Ahmad Jami, AT (BPS-15),  
GMS Yarik, District Dera Ismail Khan.

..... **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. AT 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. AT and the respondents may further please be directed to consider the appellant for promotion to the posts of SST (BPS-16) 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 AT in the respondent No.5 Department and 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 Islamyat 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 felling 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. AT (Islamyat) 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 appellants may be accepted as prayed for.

Dated: 01.02.2021.

**APPELLANT**



**JUNAID AHMAD JAMI**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK**

**KAMRAN KHAN**

**SHAHZULLAH YOUSAFZAI**

**&**

**AFRASIAB KHAN WAZIR  
ADVOCATES**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**



APPEAL NO. \_\_\_\_\_/2021

JUNAID AHMAD JAMI

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 AT 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

JUNAID AHMAD JAMI

THROUGH:

  
**NOOR MOHAMMAD KHATTAK**

ADVOCATE,

High Court Peshawar



A

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)**  
**DERA ISMAIL KHAN**

**APPOINTMENT**

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Arabic Teacher, (AT) School based, in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- 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 condition given below with effect from the date of their taking over charge:-

S.No	Roll No	NAME	FATHER'S NAME	CNIC	TOTAL SCORE	PLACE OF POSTING
1.	1740263	MUHAMMAD ABDULLAH	SAHIBZADA HAJI SHAMSUDDIN	12102-2144781-5	132.78	GMS BASTI ALI
2.1	1740503	MUHAMMAD ILYAS SHAH	SAHIB ZADA SYED MEHMOOD	12103-1499347-1	128.65	GMS GHULAM-E-WALA
3.2	1740362	MUDASER HUSSAIN	GHULAM RAZA	12103-6213381-1	127.68	GMS BUDHAN
4.3	1740509	HAFIZ MUHAMMAD UMAR FAROOQ	HAFIZ ISHAQUE AHMAD	12101-2826410-5	127.59	GMS NO. 1 PAROA
5.4	1740483	ALI RAZA KHAN	GHULAM AKBAR KHAN	12103-1499754-5	124.23	GHSS KACHA MALI KHEL
6.5	1740110	RIZWAN ULLAH KHAN	SAAD ULLAH KHAN	12101-8559614-1	123.82	GMS GARA MIR. ALAM
7.6	1740138	MUHAMMAD ABDULLAH	MUHAMMAD AMIN	12103-3258810-1	122.61	GHS BAND KURAJE
8.7	1740330	HAFIZ MUHAMMAD ABDULLAH ZAID SIRAJI	SAHIB ZADA MUHAMMAD SAAD SIRAJI	12101-6907134-5	122.58	GMS GANDI ASHIQ
9.8	1740071	ABDUR RASOOL	MEHMOOD UL MALIK	12103-0331470-5	121.91	GMS BUDH
10.9	1740057	MUHAMMAD ANZER SHAH	SYED ATTA ULLAH SHAH	12103-9377997-1	121.62	GMS FATEH ALI

**ATTESTED**

7

S.No	Roll No	NAME	FATHER'S NAME	CNIC	TOTAL SCORE	PLACE OF POSTING
11	1740064	IMDAD ULLAH	SAAD UDIN	12101-8048683-9	120.91	GMS KAICH
12	1740033	MUHAMMAD NASRULLAH	MUHAMMAD AKBAR	12104-4824973-3	120.84	GMS SARA GARA
13	2940228	ABDUR RAHMAN	MAULVI MUHAMAD	12101-5848873-7	119.88	GMS DINPUR
14	1740361	ZIA ULLAH	ATTA ULLAH	12103-4448377-5	119.79	GMS JHOKE DABARI
15	1740296	GHULAM SUBHANI	GULAM QASIM	12103-2596830-1	119.72	GHS KIRRI KHASORE
16	1740170	NAIMAT ULLAH	IMAM BAKHSH	12101-8357417-3	119.36	GMS RODA
17	1740368	MUHAMMAD ABDUL BASIT	QARI MUHAMMAD NAWAZ	12101-0981153-1	119.22	GMS MIRAN
18	1740225	IMRAN KHAN	HIZBULLAH KHAN	12102-2006018-9	119.094	GMS GARA BAKHTIAR
19	1740327	ABDUR RAUF	AJAB KHAN	12101-0968736-9	119.09	GMS NO. 1 BAND KURAI
20	1740304	NUSRAT ABBAS	MOHAMMAD BASHIR	61101-6022997-7	119.06	GMS SHEIKH YOUSAF
21	1740025	ABDUL RAFAEEZ	HAFIZ ABDUL MAJEED	12103-6796946-1	118.8	GMS RANGPUR SHUMALI
22	1740316	TASSAWAR HUSSAIN	GHULAM HUSSAIN	12103-6858019-3	118.18	GMS KACHI KHASOOR
23	1740325	HIDAYAT ULLAH	REHMAT ULLAH	12103-1692857-1	117.74	GMS WANDA NARKANI
24	1740417	ABDUL GHAFOR	ABDUL QUDOOS	12101-9197220-9	117.68	GMS NAWAB
25						
26	1740467	INAM ULLAH	ABDUL SATTAR	12101-6359693-3	117.17	GMS WANDA YARIK
27	1740256	MUHAMMAD WARIS	HAFIZ ABDUR RAZZAQ	12103-0802554-9	116.70	GMS SARDARI WALA
28	1740081	MUHAMMAD IRFAN	SAHIB ZADA ABDUL SATTAR	12102-0450206-9	116.39	GHS RORI

ATTESTED

S.No	Roll No	NAME	FATHER'S NAME	CNIC	TOTAL SCORE	PLACE OF POSTING
29.	1740108	MUHAMMAD TARIQ	MOHAMMAD RAMZAN	12101-4181087-5	116.18	GMS JHOKE GUMLA
30.	1740400	HAFIZ AHMAD TALHA SIRAJI	HAZRAT MUHAMMAD SEED	12104-0101425-9	115.61	GMS ADIL SIPRA
31.	1740122	ABDUL WAHEED	ABDUL HAMEED	12103-6158695-3	115.35	GMS JHOKE QURESHIAN
32.	1740353	SHAIKH ZAIN UL ABEDDAIN	SHAIKH SIRAJ UDDIN	12102-7419040-9	114.87	GMS KOT TAGGA
33.	1740043	AZIZ UL MUTAAL	HAFIZ MUHAMMAD NAEEM	12101-6077700-5	114.46	GMS THAHEEM ABAD
34.	1740299	NOOR MUHAMMAD	DIN MUHAMMAD	12104-9490419-9	114.28	GMS MANGAL
35.	1740358	PERVEZ AHMED	GHULAM HASSAN	12103-3006315-3	113.92	GMS MIRBAZI
36.	1740155	ZIA UR REHMAN	MUHAMMAD SHAH	12103-3738692-1	113.56	GMS PUSHA
37.	1740421	ABDUL SATTAR KHAN	SHAH NAWAZ KHAN	12101-5760504-1	113.17	GMS KOTLA QAIM SHAH
38.	1740165	ABDUL KARIM	GHULAM YASIN	12101-3193921-9	113.07	GMS JHOKE MAKHA
39.	1740285	MUHAMMAD KALEEM RIZWAN	GHULAM ALI	12102-3948658-3	112.37	GMS KULACHI
40.	1740420	ABDUL AZIZ	ABDUL MAJID	12103-9027618-1	112.36	GHS JHOKE MUAZAM
41.	1740088	MUHAMMAD YAQOOB	ALLAH BAKHSH	12103-0428066-1	111.44	GHS UMAR KHEL SHARQI
42.	1740232	MUHAMMAD JAMSHED IQBAL	MUHAMMAD RAMZAN	12101-3527003-1	111.40	GMS DARABRI
43.	1740449	MUHAMMAD SHARIF	MUHAMMAD HAYAT	12101-0944042-1	111.26	GMS JHOKE MOHANA DIKhan
44.	1740430	MIRAJ UD DIN	MOEENUDDIN	12102-8966446-5	111.17	GMS ZARKANI
45.	1740278	GHULAM JEELANI	AHMAD KHAN	12103-7956069-5	110.95	GMS SHINKI

**ATTESTED**

9

S.No	Roll No	NAME	FATHER'S NAME	CNIC	TOTAL SCORE	PLACE OF POSTING
46.	1740069	ALLAH WASAYA	ABDUL HAKEEM	12101-6821877-3	109.11	GMS RORA
47.	1740077	MUFTI KIFAYAT ULLAH	FARID UD DIN	12101-0194628-9	108.69	GMS GARA GULDAD
48.	1740054	NEMATULLAH	ALLAH WASAYA	12101-6732299-5	106.81	GMS CHAH KHAN WALA
49.	1740389	MUHAMMAD ANNUS MOAVIA	MUNIR AHMAD	12101-2264888-3	105.83	GMS WANDA DHAWA
50.	1740154	NIAZ HUSSAIN	KHUDA BAKHSH	12101-0944025-5	101.42	GMS BASTI RAJAB ALI
51.	1740331	MUHAMMAD TAYYAB	ABDUL HAKIM AKBARI	12101-0930936-9	86.91	GMS LUNDA PARA

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 from the date of issuance.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (if required).
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO, anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action. Expenditure on verification will be borne by the appointees.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stands expired automatically and no subsequent appeal etc shall be entertained.

**ATTACHED**

9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, he will have to sign an agreement with the Department; otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
13. His appointment is made on School based, He will have to serve at the place of posting, and His service is not transferable to any other station.
14. Before handing over charge, once again their document may be checked by the DDO concerned, if they have not the required relevant qualifications as per rules or in case of any degree/certificate issued after January 20, 2014 against which he claimed score for merit they may not be handed over charge of the post.

*Zd-*  
Zia-ud-Din  
District Education Officer (M)  
DIKHAN

Dated DIKkhan the 13/06 /2014

Endst No 8715-8820 /EB

Copy forwarded for information and necessary action to:

1. The Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. The District Comptroller of Accounts DIKHAN.
3. The PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
4. The Principal/ Headmaster of Concerned Schools.
5. The Candidates Concerned.
6. Master File.

**ATTESTED**

*Zia-ud-Din*  
13/06  
District Education Officer (M)  
DIKHAN



BU:S.No. 011497

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

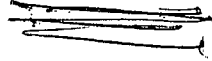
(1/R)

Roll No. 15138

**Board of Intermediate & Secondary Education**  
**BANNU (N-W.F.P.), PAKISTAN.**



Annexure "B"



**SECONDARY SCHOOL CERTIFICATE EXAMINATION**

**SESSION 2006 ANNUAL**

*This is to Certify that Junaid Ahmad Jami*

*Son of*

Saeed Ahmad

*Student of*

Govt. High School, Wanda Lali, D.I.Khan

*has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu held in March, 2006 as a Regular candidate.*

*He obtained 644 marks out of 1050 and has been placed in Grade*

**B**

*Representing Very Good. The candidate passed in the following subjects:*

1. English	2. Urdu	3. Islamiyat	4. Pakistan Studies
5. General Science	6. Arts And Model Drawing	7. Islamic Studies	8. Mathematics

*Date of birth: (05-08-1989). in words: 05 August, Nineteen Eighty-Nine.*

*Registration No: 041-B-BWLD-1-04*

*Date of declaration of Result: 26-06-2006*

*Prepared on: 19-04-2008*

**Asstt. Secretary**

*19/4/08*

**SECRETARY**

*This certificate is issued without alteration or erasure*

**ATTESTED**

12

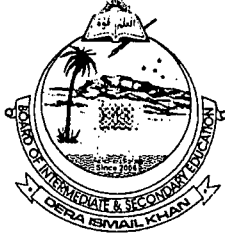
DIK :S.No. 3280

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 10512



Board of Intermediate & Secondary Education



DERA ISMAIL KHAN (N-W.F.P.), PAKISTAN.

**HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION**

~~Pre-Medical / Pre-Engineering~~ / Humanities Group

SESSION (A) 2008

THIS IS TO CERTIFY THAT JUNAID AHMAD JAMI

Son/~~Daughter~~ of SAEED AHMAD

and a student of Govt. Degree College Paniala, D.I.Khan.

Registered No. 52-DB-CPLD-2006 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Dera Ismail Khan.

as a Regular/~~Private~~ candidate. He/~~She~~ obtained 567 Marks out of 1100 and has been placed in Grade C Representing Good

He/~~She~~ has been awarded Grade XXXXXXXX on the basis of internal assessment by the Institution concerned.

*[Signature]*  
Asst. Secretary  
01/10-06-11

*[Signature]*  
Secretary

This certificate is issued without alteration or erasure.

ATTESTED

Serial No: GU 007264

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN

KHYBER PAKHTUNKHWA



(Session 2010 )  
ANNUAL

JUNAID AHMAD JAMI SON of SAEED AHMAD and

a student of GOVT. COLLEGE PANTALA D.I. KHAN.

having passed the prescribed examination in JUNE/JULY 20 10,  
is this day admitted by the GOMAL UNIVERSITY to the DEGREE of

## BACHELOR OF SCIENCE

in the SECOND Division HE Passed also in XXXXXX as an

~~Additional Optional Subject~~ Pakistan Studies and Islamiyat as Compulsory Subjects.

The Examination was taken as a whole/~~in parts~~.

Registered No. 77-PAN-09

Roll No. 1331

Result declared on OCTOBER 4, 2010

Countersigned

M  
Controller of Examinations

M. Khuram  
Vice-Chancellor

ATTESTED

Serial No. GU 005986

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**GOMAL UNIVERSITY**

**DERA ISMAIL KHAN**

**(NWFP) PAKISTAN**

KHYBER PAKHTUNKHWA

14



(Session 2010-2012 )

JUNAID AHMAD JAMI

SON of

SAEED AHMAD

and

a student of DEPARTMENT OF STATISTICS

having passed the prescribed examination in SEPTEMBER 20 12,

is this day admitted by the GOMAL UNIVERSITY to the DEGREE of

**MASTER OF SCIENCE**

in the FIRST Class

The subject of examination being STATISTICS.


The Examination was taken as a whole/~~in parts~~

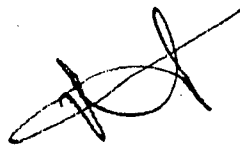
Registered No. 77-FAM-09

Roll No. 650

Result declared on JUNE 10, 2013

Countersigned

  
Controller of Examinations

  
Vice-Chancellor

**ATTESTED**

**GOMAL UNIVERSITY**  
**DERA ISMAIL KHAN**  
**KHYBER PAKHTUNKHWA, PAKISTAN**



(Session 2013 )  
ANNUAL

JUNAID AHMAD JAMI Son/Daughter of SAEED AHMAD and  
a student of DERA ISMAIL KHAN DISTRICT  
having passed the prescribed examination in APRIL/MAY 2014,  
is this day admitted by the GOMAL UNIVERSITY to the DEGREE of

**MASTER OF ARTS**

in the FIRST Division.


The subject of examination being ISLAMIYAT

The Examination was taken as a whole/in parts.


Registered No. 77-PAN-09

Roll No. 3824

Result declared on DECEMBER 22, 2014

  
Controller of Examinations

Countersigned

  
Vice-Chancellor

**ATTESTED**

Alama Iqbal Open University  
Islamabad

15/A



Serial No. 185180

Certified that Mr. / Ms. JUNAID AHMAD JAMI

Son / Daughter of SAEED AHMAD

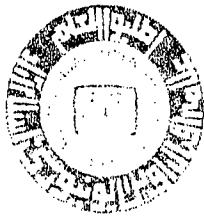
Registration No: 08NDN00587 Roll No: AK672945

having successfully completed the prescribed requirements  
in semester SPRING 2012 is awarded the degree of

**Bachelor of Education (B.Ed)**

He/She has secured 70 % marks and has been placed in A grade.

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: January 04, 2013

Date of Issue: September 18, 2013

**ATTESTED**

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

15/B  
Allama Iqbal Open University  
Islamabad



Serial No. 44551

Certified that Mr. / Ms. JUNAID AHMAD JAMI

Son / Daughter of SAEED AHMAD

Registration No: 08NDN00587

Roll No: AT621755

having successfully completed the prescribed requirements  
in semester SPRING, 2014 is awarded the degree of

*Master of Education (M.Ed.)*

He/She has secured 69 % marks and has been placed in B grade.

*Mam*

74  
76  
CONTROLLER OF EXAMINATIONS

VICE-CHANCELLOR

Result declared on: March 25, 2015

Date of Issue: January 04, 2016

**ATTESTED**

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY



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

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

**NOTIFICATION**

**No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre**:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

**AMENDMENTS**

In the Appendix,-  
(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1.	Subject Specialist (BPS-17)	i. 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

ATTESTED



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</p> <p>(b) fifty percent by initial recruitment"; and</p>
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*[Handwritten signature]*

(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>

ATTESTED

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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:

ATTESTED

*(Handwritten initials)*

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

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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 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

(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. 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."

ATTESTED

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(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

**ATTESTED**

(ZAMIN KHAN MOMAND)  
SECTION OFFICER (PRIMARY)

Annxure D

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EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. P111

GAZETTE

## KHYBER PAKHTUNKHWA

Published by Authority

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

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

#### NOTIFICATION

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

No.SO(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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<p>2. Secondary School Teacher-Information Technology (SST-IT) (BPS-16)</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-II 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>i. At least 2<sup>nd</sup> Division Intermediate School Certificate or equivalent qualification from a recognized Institution or Board with one year Diploma in Information Technology Computer Science from any recognized institution; and</p> <p>ii. Certified Teacher Certificate (CT) or Associate Degree in Education (ADE) from any recognized institution/ University</p> <p>Note: A candidate did not have the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.</p>	<p>18-35</p>	<p>By initial recruitment.</p>

50% CT (IT)

50% Fresh

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

ATTESTED

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

ATTESTED

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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. Quisar Alam, Special Secretary (Est.) E&SE Department.
3. Mr. Muhammad Rafiq Khattak, Director E&SE, Peshawar.
4. Mr. Muhammad Shouib, Deputy Secretary (A), E&SE Department
5. Mr. Javed Siddique, Deputy Secretary (B) Finance Department.
6. Mr. Malik Muhammad, Section Officer (Primary) E&SE Department.
7. Mr. Mohsin Mushfaq, Assistant (R-I) E&AD Department.

2. The forum was informed that E&SE Department vide Notification No. SO/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**

Signature of the post

Subject Specialist-Information Technology (SS-IT) (B-17)

Government Schools/ Govt. Comprehensive High Schools and other equivalent posts in the Teaching Cadre.

Minimum Qualification for appointment by initial recruitment or by transfer.

i.) Master Degree in Computer Science/IT at least in 2<sup>nd</sup> Division or equivalent qualification from any recognized University.

ii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized University.

iii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

iv.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

v.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

vi.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

vii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

viii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

ix.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

x.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xi.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xiii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xiv.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xv.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xvi.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xvii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xviii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xix.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xx.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxi.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxiii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxiv.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxv.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxvi.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxvii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxviii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxix.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxx.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

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xxxvii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxxviii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xxxix.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xl.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xli.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xlii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

xliiii.) Bachelor Degree of Education (B.Ed) at least in 2<sup>nd</sup> Division from any recognized institution.

Method of recruitment

Age Limit

21-35

ix) Fifty percent by promotion on the basis of seniority-cum-finesse from amongst the Secondary School Teacher-II 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 than by initial recruitment.

Their seniority may be clubbed with SS and amendment may be made in the existing service rules.

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.

Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment.

21-35

21-35

By initial recruitment.

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.

Junior Teacher-Information Technology (JT-IT) (B-12)

Govt. High/Higher Secondary Schools

Govt. High/Higher Secondary Schools

Govt. High/Higher Secondary Schools

Govt. High/Higher Secondary Schools

Govt. High/Higher Secondary Schools

Govt. High/Higher Secondary Schools

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Govt. High/Higher Secondary Schools

Govt. High/Higher Secondary Schools

ATTESTED

*[Signature]*

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

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RESIDUAL

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.

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

(Mahsin Mushtaq)  
Assistant (R-1), E&AD Deptt:

Naik Muhammad  
Section Officer (Primary), E&SE Department

Muhammad Shoaib  
Deputy Secretary (A), E&SE Deptt:

(Mohammad Rafique Khattak)  
Director, E & SE, Peshawar

(Qaiser Alam)  
Special Secretary, E&SE Deptt:

Dr. Shahzad Khan Bangash  
Secretary E&SE Department  
(Chairman)

**ATTESTED**



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

28

Dated: Peshawar, the August 15, 2018.

**SANCTION**

No. SO/BSA/IT-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
*150359-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	
<b>Total</b>		<b>1476</b>	

2. The expenditure involved is debitible 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/E).
3. The Project Manager-IT/Deputy Director (EMIS), E. & S. Education Department.
4. All the Deputy Commissioners in Khyber Pakhtunkhwa.
5. Master File.

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

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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:

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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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AT

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Q.A

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PST

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*[Signature]*



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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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Annxure "E"

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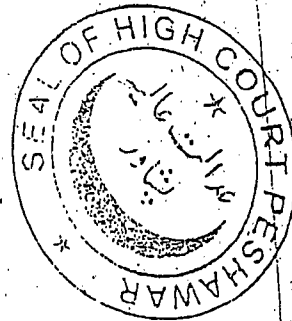
JUDGMENT SHEET  
PESHAWAR HIGH COURT PESHAWAR  
JUDICIAL DEPARTMENT

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.

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LIAZ 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*

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**EXAMINER**  
Peshawar High Court



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

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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 "I.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

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EXAMINER  
Peshawar High Court

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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

(01) Hon'ble Justice Ibrahim Khan and Hon'ble Mr. Justice Ijaz Ahmad

23/9/2020

6285  
Date of Presentation of Application: 3/9/2020  
No of Pages: 11-7  
Copying: 44  
Total: 44  
Date of Preparation of Copy: 7/9/2020  
Date of Delivery of copy: 7/9/2020  
Received By: [Signature]

[Signature]  
CERTIFICATE OF TRUE COPY  
Authorised by the Controller of the District Court, Peshawar  
07 SEP 2020

ATTESTED

[Signature]

(36)

Anxxure "F"

To,

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

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).

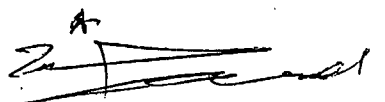
Respected Sir,

Most respectfully it is stated that I am the employee of your good self-Department and performing my duty as AT at GMS Yarik, D.I. Khan 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 appelliant 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



JUNAID AHMAD JAMI, AT  
GMS Yarik, D.I. Khan

ATTESTED

**VAKALATNAMA**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

\_\_\_\_\_ OF 2021

Junaid Ahmad Jamri

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt

(RESPONDENT)  
(DEFENDANT)

I/We Junaid Ahmad Jamri

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



**CLIENT(S)**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**

**15401-0705985-5**

**BC-08-0853**

**&**

**KAMRAN KHAN**

**AFRASIAB KHAN WAZIR**

**HARDER ALI**

**ADVOCATES**

OFFICE:

Flat No.4, Upper Floor,

Juma khan plaza near (FATA) Secretariat

Warsak road Peshawar.

Mobile No. **0345-9383141**