


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.

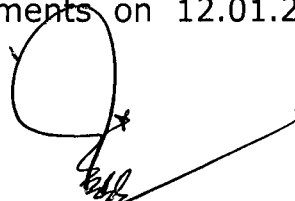

(Rozina Rehman)
Member (J)

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.

(10) 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.

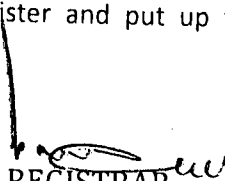




Chairman

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 style="text-align: right;"> 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 style="text-align: right;"> 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 style="text-align: right;"> 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 style="text-align: right;"> Reader</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 2397 /2021

WAQAS

VS

EDUCATION DEPTT

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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. Waqas, DM (BPS-15),
GHS Hadora Bandi, District Abbottabad.

..... **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. DM 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. DM 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 DM in the respondent No.5 Department and subsequently regularized 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 Computer Science and was appointed/ selected on this qualification in the respondent No.5 department. Copies of the educational testimonials 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

Waqas
WAQAS

THOROUGH:

q
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

SHAHZULLAH YOUSAFZAI

&

**AFRASIAB KHAN WAZIR
ADVOCATES**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

WAQAS

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 DM 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

WAQAS

THROUGH:

NOOR MOHAMMAD KHATTAK

ADVOCATE,

High Court Peshawar

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD
APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the vacant posts of Drawing Master, School based, in BPS-15 (Rs.13510-1120-47110) @ Rs. 13510/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:

Sr. No	Roll No	Name	Date of Birth	NIC	School	Merit	Remarks
1	1112000160	ALAMGIR KHAN	21-2-1982	13101-5827294-7	GMS Maira Rehmal	121.87	Against Vacant Post
2	7612000185	WAQAS	5-12-1987	13503-9017581-3	GHS Hadora	119.0	Against Vacant Post
3	1112000107	FAROOQ KHAN	8-4-1985	13101-5045619-1	GMS Beri Baqla	117.92	Against Vacant Post
4	1112000150	MUHAMMAD IBRAHIM	29-4-1984	13101-5742946-7	GMS Malkol	116.74	Against Vacant Post
5	1112000135	NOHMAN SULTAN	25-5-1989	13101-3627167-9	GHS Pallan <i>Khuzda</i>	113.27	Against Vacant Post

TERMS & CONDITIONS

1. No TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. They should not be handed over charge if he exceeds 35 years or below 18 years of age.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO Office, anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of their documents is issued by this office.
8. They should join their post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, their appointment will stand expired automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge, they will have to sign an agreement with the Department; otherwise this order will not be valid.
11. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. Their services shall be terminated at any time, in case their performance is found unsatisfactory during contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
13. 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.
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, they may not be handed over charge of the post.
15. In case of miscalculation of their marks affecting merit at any stage will be rectified accordingly which may affect the place of posting and appointment resultantly.
16. Copy of professional standards, core competencies and job description issued vide Govt. of Khyber Pakhtunkhwa E&SE Notification No. 50(PE)4-3/PST/2014 dated 17-09-2014 is attached with the appointment order.

Qazi Tajjamal Hussain
District Education Officer (M)
Abbottabad

Dated 11-3-2017

Endst No 2616-23 /EB-III/DM

Copy forwarded for information and necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Comptroller of Accounts Abbottabad.
3. Principal/ Headmaster of Concerned Schools.
4. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
5. AP EMIS local office.
6. Budget & Accounts Officer Local Office.
7. Candidates Concerned.
8. Master File.

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

NOTIFICATION:-

7

In pursuance to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification issued vide No. SO(S/F)E&SED/3-2/2018/SITT/Contract dated 16-02-2018, Services of the following Drawing Masters(DM) appointed on adhoc basis on Contract, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the said post:-

S.N	Roll No	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
1.	11326	Sajjad Ahmed 13101-0181549-5	Sultan Pur Havelian	103.87	GMS Ali Abad	2919-24 05-05-14	6133 dated 13/7/2015
2.	1130049	Arshad Zareen 13101-3778084-7	Village & PO Makol Payen	100.32	GMS Hazeera	2919-24 05-05-14	6133 dated 13/7/2015
3.	1130041	Sajid Khan 13101-6334600-9	Village Harnara Havelian Atd	100.27	GMS Hatrol	2919-24 05-05-14	6133 dated 13/7/2015
4.	111200221	Aamir Saeed 131013343632-5	Village & PO Namli Maira	112.71	GMS Kassaki Kalan	1867-72 14-03-15	2473 dated 28/3/2016
5.	111200220	Abdul Hameed 131013292324-5	V&PO Bachah Khurd Sherwan	111.2	GMS Battangi Khurd	1867-72 Dt 14.03.201 5	2473 dated 28/3/2016
6.	111200205	Abdul Kareem 131013327221-9	Vill Khori Khetar Majhuan	110.52	GMS Pall Boi	1867-72 Dt 14.03.15	2473 dated 28/3/2016
7.	111200172	Wahid Ur Rehman 42501- 9570419-3	V & PO Khaliala Atd	108.55	GMS Dobatter	1367-72 Dt 14.03.2015	2473 dated 28/3/2016
8.	111200226	Muhammad Nadeem 13101- 8415535-3	V&PO Gali Banian	106.87	GMS Andersari	1867-72 Dt 14.3.2015	2473 dated 28/3/2016
9.	111200229	Mumtaz Ali 131019435931-1	Vill: Kari Raki Atd	105.11	GMS Bassian	1867-72 dt 14.03.2015	2473 dated 28/3/2016
10.	111200177	Muhammad Toseef 131011531011-7	Vill: Bandi Dhanak PO Chando Maira	105.01	GMS Majuhon	1861-66 Dt 14.03.2015	2473 dated 28/3/2016
11.	111200186	Waqas Tariq 13101-9789323-7	Village Namli Maira Atd	106.37	GMS Seri Khan Kalan	1680-87 29-02- 2016	3494 dated 31/3/2017
12.	111200177	Muhammad Waqas 131015486553-1	V Bandi Dhanak PO Chando Maira	105.55	GHSS Lora	1680-87 Dt 29.2.2016	3494 dated 31/3/2017
13.	111200142	M. Bashrat 13101- 1798309-1	Havelian	96.29	GHS Lahoor	1680-87 dt 29- 02-2016	3494 dated 31/3/2017
14.	111200155	Faida Ullah Jan Abbasi 374054351689-1	V&PO Lora	95.14	GMS Goreeni	4972-78 10-06- 2016	3494 dated 31/3/2017
15.	1112000160	Alamgir Khan 13101-5827294-7	V Kasala PO Nagri Bala Atd	121.87	GMS Maira Rehmal	2616-23 Dt 11.03.2017	
16.	2616-23 Dt 11.03.2017	Waqas 135039017581-3	Village Devli Bandi Atd	119.00	GMS Hadora Bandi	2616-23 Dt 11.03.2017	
17.	1112000197	Muhammad 131016046810-1	V&PO Taran	117.92	GMS Bari Bagla	2616-23 Dt 11.03.2017	

ATTACHED

111200141	Mehrab Imed 1310175963 42-3	V&PO Makol Payeen	83.94	GHSS Bagnotar	7479-85 Dt 05.07.2017		
11200174	Tehseen Zulfiqar 1310116904 07-5	Village & PO Namli Malra	82.41	GMS Mahmda	7479-85 Dt 05.07.2017		

TERMS & CONDITIONS.

(Handwritten signature)

Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011 and such rules & regulations as may be issued from time to time by the government.

Their pay shall be released subject to verification of academic documents/testimonial from the concerned board/ university by the District Officer concerned.

Their services shall be considered regular and they shall be eligible for the pension/deduction of GP fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.

Their services are liable to termination on one month notice from either side in case of resignation without notice, their one month pay & allowance shall be forfeited to the government.

They shall possess the same qualification and experience required for the regular post.

They shall have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other ground before the commencement of this act.

Their regularization shall not effect the promotion quota of existing holders of posts in respective service cadres.

They shall rank junior to all other employees belonging to the same cadre who are in service on regular basis on the commencement of this Act and shall also rank junior to such other persons if any, who, in pursuance of the recommendation of Khyber Pakhtunkhwa Public Service Commission made before the commencement of this Act are to be appointed to the cadre, Irrespective of their actual date of appointment.

Their seniority shall be determined on the basis of their continuous service in cadre provided that if the date of continuous service in case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

(QAZI TAJAMAL HUSSAIN)
DISTRICT EDUCATION OFFICER(M)
ABBOTTABAD

Endst: No. 3132-38 EBU/DM/Regularization Dated 10/3/2018

Copy forwarded for information and necessary action to the:-

1. Secretary to Govt: of Khyber Pakhtunkhwa E&SED Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Monitoring Officer(IMU) Abbottabad.
4. District Comptroller of Accounts Abbottabad.
5. All the Principals/Headmasters of concerned schools
6. B&AO Local Office
7. Assistant Programmer EMIS Local Office.

ATTACHED

(Handwritten signature)

ADA No. 177567

Roll No. 73997

Amx par + B

9

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan

SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2005

This is to certify that WAQAS

Son of GHULAM RASOOL

A candidate from TAMEER-I-NAU SECONDARY PUBLIC SCHOOL MANSEHRA has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in March, 2005 as a Regular Candidate. He has obtained 747 marks out of 1050 and has been placed in Grade A Representing EXCELLENT.

The candidate passed in the following subjects:


- | | | | |
|------------|------------|--------------|----------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT | 4. PAK STUDIES |
| 5. MATHS | 6. PHYSICS | 7. CHEMISTRY | 8. BIOLOGY |

Date of Birth according to admission form is FIFTH DECEMBER

One Thousand Nine Hundred and EIGHTY-SEVEN (05-12-1987)


Asstt. Secretary

This certificate is issued without alteration or erasure.


Secretary

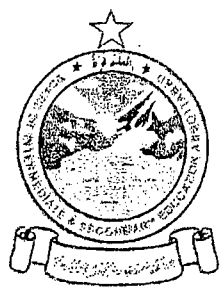
ATTESTED

10

ADA No 085808

Roll No. 59476

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan

HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2007

Comp /Gen: Science Group

This is to certify that WAQAS

Son of GHULAM RASOOL

A candidate from ABASEN PUBLIC SCHOOL & COLLEGE MANSEHRA
has passed the Higher Secondary School Certificate Examination of the Board of
Intermediate and Secondary Education, Abbottabad held in May/June 2007 as a
Regular Candidate. He has obtained 633 marks out of 1100 and has been
placed in Grade C Representing GOOD.

The Examination was taken as a Whole/In Parts and the candidate passed in the
following subjects:

- | | | |
|---------------|-----------|------------------------|
| 1 ENGLISH | 2 URDU | 3 ISL. EDU-PAK STUDIES |
| 4 MATHEMATICS | 5 PHYSICS | 6 COMPUTER SCIENCE |


Asstt. Secretary


Secretary

ATTESTED

Serial No. 003905

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 08-MSR-54

Roll No. 95143

HAZARA UNIVERSITY

Mansehra, Pakistan



DECEASED

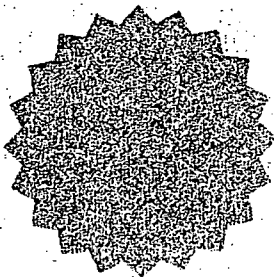
The University in recognition of the fulfilment of prescribed requirements has conferred upon

Mr / Ms Waqas Son / Daughter of Ghulam Rasool

The Degree of **BACHELOR OF SCIENCE** in the examination
field in November 2009 session Supplementary 2009 (Regular)

He / She was placed in Second Division / Grade / CGPA.

The examination was taken in parts.



[Signature]
Controller of Examinations

Date 20 Jan-2010

[Signature]
Vice Chancellor

[Signature]
Registrar

12



HAZARA UNIVERSITY, MANSEHRA, PAKISTAN
GOVERNMENT COLLEGE OF MANAGEMENT SCIENCES ABBOTTABAD
 (Fall 2010- Spring 2012)



TRANSCRIPT

Name: **WAQAS** Roll No: **F10-MBA-107**
 Father's Name: **GHULAM RASOOL** Degree: **M. B. A.**
 Registration No: **08-MSR-54** Specialization: **FINANCE**
 Total Cr. Hrs. **72** Duration: **02 Years**

Semester	Title of Course	Cr. Hrs.	Maximum Marks	Marks Obtained	Grade Points	Grade	GPA
Semester-1 (Fall 2010)	1. Financial Accounting	3	100	65	7.5	C	2.93
	2. P.O. Management	3	100	70	9	B-	
	3. Business Communication	3	100	67	8.1	C+	
	4. Computer Orientation	3	100	76	10.8	B+	
	5. Business Maths & Statistics	3	100	87	12	A	
	6. P.O. Marketing	3	100	58	5.4	D	
Semester-2 (Spring 2011)	1. Managerial Accounting	3	100	66	7.8	C+	2.75
	2. Economics (Micro & Macro)	3	100	65	7.5	C	
	3. Banking & Finance	3	100	71	9.3	B-	
	4. Business Research Methods	3	100	65	7.5	C	
	5. Marketing Management	3	100	86	12	A	
	6. Management Information System	3	100	58	5.4	D	
Semester-3 (Fall 2011)	1. Production & Operation Management	3	100	64	7.2	C	2.6
	2. Financial Management	3	100	70	9	B-	
	3. Human Resource Management	3	100	66	7.8	C+	
	4. F.S.A.	3	100	60	6	C-	
	5. Corporate Finance	3	100	70	9	B-	
Semester-4 (Spring 2012)	1. Strategic Management	3	100	50	3	D	2.04
	2. Organizational Behavior	3	100	60	6	C-	
	3. Entrepreneurship	3	100	50	3	D	
	4. Islamic Finance	3	100	63	6.9	C	
	5. Project Management	3	100	50	3	D	
	6. Internship & Viva Voice	6	200	150	21	-	

CGPA: **2.58**
 Total Marks: **2400**
 Obtained Marks: **1587**
 Percentage: **66%**

Note: Any errors & omissions are subject to subsequent rectification.
 Prepared & checked by: Abdus Samad (Controller of Exams)

Controller of Exams
 G. C M S Abbottabad.

PRINCIPAL
 G. C M S Abbottabad.

[Signature]

COUNTERSIGNED
 Prof. SHAKIL AHMED
 Director General Technical Education &
 Manpower Trg. Khyber Pakhtunkhwa

[Signature]

COUNTERSIGNED
 Controller of Exams
 Hazara University Mansehra,
 PAKISTAN.

ATTESTED

Serial No. 001502

مَدِينَةُ الْحَرَامِ الرَّحْمَنِ

Registration No. 08-MSR-54

Roll No. F10-MBA-107

HAZARA UNIVERSITY

Mansehra, Pakistan



ATTESTED

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

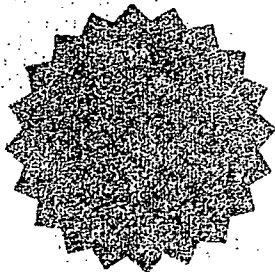
Mr / Ms Waqas Son / Daughter of Ghulam Rasool

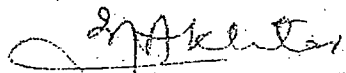
The Degree of **MASTER OF BUSINESS ADMINISTRATION** in the examination

field in June, 2012 session 2010-12 (Regular)

He / She was placed in 2.58 Division / Grade / CGPA.

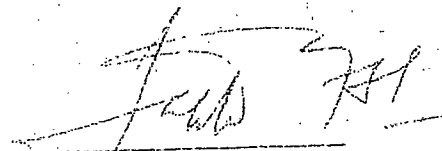
The examination was taken as a Whole.





Controller of Examinations

Date 19-October-2012



Vice Chancellor



Registrar

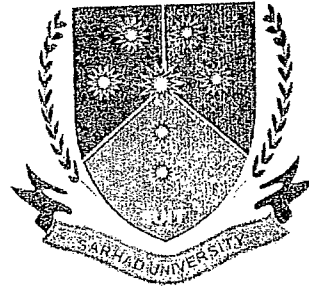
13

14

Registration No. SUT-14-01-068-0015

Serial No. 103405

ATTESTED



Sarhad University of Science & Information Technology

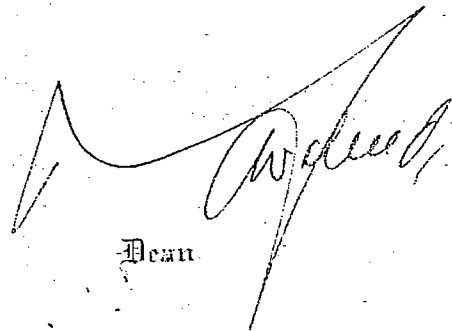
This is to certify that Waqas

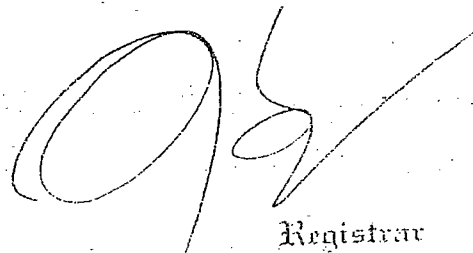
son/daughter of Ghulam Rasool

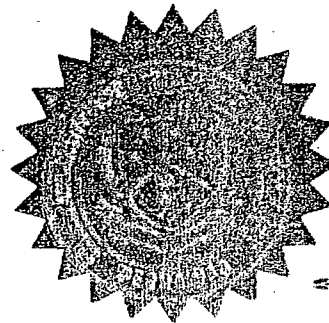
having passed the requisite examination, is hereby awarded the

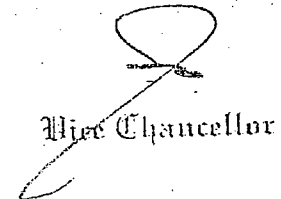
Diploma in Drawing Master

Given at Peshawar (PAKISTAN) on the First Day of December Two Thousand Fifteen.


Dean


Registrar



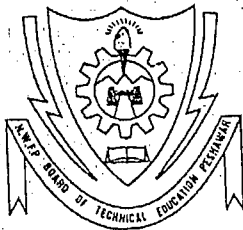

Vice Chancellor

15

Serial No. 8860

Roll No. 13921

NWFP BOARD OF TECHNICAL EDUCATION
PESHAWAR



Diploma in Information Technology

Session 2nd Term, 2009.

This is to certify that

Mr./Miss WAQAS

Son/Daughter of Mr. GHULAM HASBOL

Registration No. TECC/MSR/BIT/AUG-00/1779

of PARAGON INTERNATIONAL COLLEGE OF COMMERCE, MANSERVA has

Satisfactorily completed the one year duration Information Technology course titled "Diploma in Information Technology" and passed its Examination held by the N.W.F.P Board of Technical Education Peshawar in the month of Aug. 2009.

He/She secured 1212 Marks out of 1700 and was placed in Grade 1st.

In recognition thereof, this Diploma in Information Technology is awarded to him/her at Peshawar.

On the 6th day of June, 2011.

[Signature]
Assistant Secretary

[Signature]
Secretary

ATTESTED

Serial No. 001370

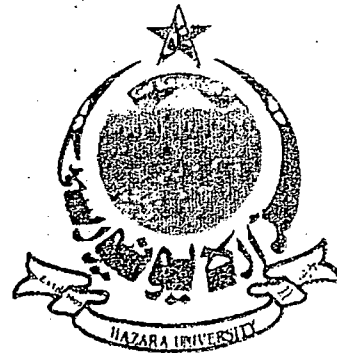


Registration No. 08-MSR-54

Roll No. 50146

HAZARA UNIVERSITY

Mansehra, Pakistan

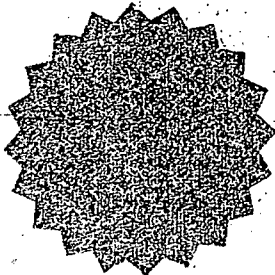


ATTESTED

The University in recognition of the fulfilment of prescribed requirements has conferred upon
Mr / Ms Waqas Son / Daughter of Ghulam Rasool

The Degree of **BACHELOR OF EDUCATION** in the examination
field in August 2015 session Annual 2015 (Regular)

He / She was placed in Second Division / Grade / CGPA.



[Signature]
Controller of Examinations

Date 29-01-2016

[Signature]
Vice Chancellor

[Signature]
Registrar

IS/A



SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

Transcript No. SU/

41448

TRANSCRIPT

15/B

Name: Waqas

Reg. No: SUIT-16-02-036-0030

Father's Name: Ghulam Rasool

Roll No: 16-SP-83784

Degree: Master of Education

Enrollment Date: 14 Mar, 2016

Faculty: Arts, Social Sciences and Education

Completion Date: 10 May, 2017

Spring Semester 2016

Cr Hrs	Marks	Grade	GPs	Remarks	
SME 626	Comparative Education	3 - 0	86	A	12
SME 627	Computers in Education	3 - 0	0	F	0
SME 628	Educational Research	3 - 0	76	B	9
SME 629	Advance Educational Psychology	3 - 0	81	B+	10.5
SME 630	Guidance and Counselling	3 - 0	72	B	9

Cum Cr: 15.0 GPA: 2.700 Cum GPA: 2.70 Status: PTD

Fall Semester 2016

SME 627	Computers in Education	3 - 0	74	B	9	Improved
SME 631	Educational Management and Supervision	3 - 0	73	B	9	
SME 632	Education in Pakistan: Problems Issues & Trends	3 - 0	77	B	9	
SME 633	Curriculum Development and Implementation	3 - 0	76	B	9	
SME 635	Teacher Education in Pakistan	3 - 0	88	A	12	
SME 638	Higher Education	3 - 0	70	B	9	
SME 653	Teaching Strategies	3 - 0	75	B	9	
SME 654	Economics of Education	3 - 0	74	B	9	

Cum Cr: 36.0 GPA: 3.125 Cum GPA: 3.21 Status: QFD

Marks Obtained : 922 Total Marks : 1200 Overall Percentage : 76.83%

(Errors and omissions are subject to subsequent rectification)

END OF TRANSCRIPT

Waqas
Dean

(Degree Completed)

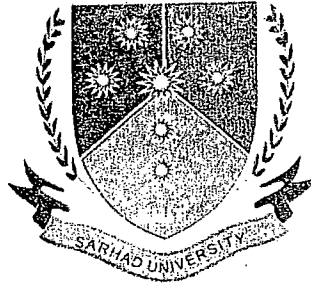
Fari
Controller of Examinations

ATTESTED

(Errors and omissions are subject to subsequent rectification)

Registration No. SUIT-16-02-036-0030

Serial No. 020627



Sarhad University of Science & Information Technology

This is to certify that Waqas

son/daughter of Ghulam Rasool

Having passed the requisite examination, is hereby awarded the degree of

Master of Education

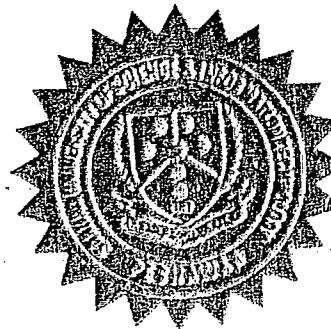
With all the rights and privileges appertaining therein.

Given at Peshawar (PAKISTAN) on the Twentieth Day of May Two Thousand Seventeen.

ATTESTED

Registrar

Vice-Chancellor



President

15/c

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

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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.s</p> <p>(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

A

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

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

Primary School Head Teachers ~~for~~ 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



(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)

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EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P111

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 24th APRIL, 2018.

GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated: 24th April 2017.

No.S0(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 (ii), 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

ATTESIED

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

ATTACHED

Handwritten marks and signatures at the bottom of the page.

25

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

22

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. Shahzad Khan Bangash, Secretary E&SE Department (In Chair)
2. Mr. Qaisar Alam, Special Secretary (Est.) 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. 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. 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

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Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1. Subject Specialist-Information Technology (SS-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in the Teaching Cadre.	i.) Master Degree in Computer Science/IT at least in 2 nd Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 nd Division from any recognized University.	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years' service AND Secondary School Teacher (SST) (General/Science) possessing master degree in IT or equivalent qualification with 05 years' experience. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment. Their seniority may be clubbed with SS and amendment may be made in the existing service rules.
2. Secondary School Teacher Information Technology (SS-IT) (B-16) Govt. High / Higher Secondary Schools	i). Bachelor Degree with the subject of Computer Science at least in 2 nd Division or equivalent Qualification from any recognized institution. ii). Bachelor Degree of Education (B. Ed) at least in 2 nd Division from any recognized institution.	21-35	a). Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Computer Lab In-charge with (05) years' service having the qualification prescribed for the post of IT Teacher. b). Fifty percent by initial recruitment. Note: If no suitable candidate is available for promotion in the relevant cadre than by initial recruitment.
3. Junior Teacher- Information Technology (JT-IT) (B-12) Govt. High / Higher Secondary Schools	Intermediate or equivalent qualification from any recognized institution with one-year Diploma in IT/Computer Science from any recognized institution and Certified Teacher Certificate/Diploma or equivalent qualification from any recognized institution.	18-35	By initial recruitment.

ATTESTED

[Signature]

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

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.

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

(Mohsin Mushtaq)
Assistant (R-I), 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 Adam)
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. SQ/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
150559-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-II)	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.

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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 filed 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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				<p>qualification mentioned in column No.3:</p> <p>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:</p> <p>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</p> <p>(ii) twenty five percent by initial recruitment.</p> <p>NOTE:</p> <ol style="list-style-type: none"> 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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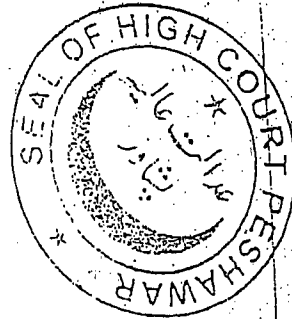
32

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

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EXAMINER
Peshawar High Court

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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.

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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

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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 "LA Sherwani and others (1991 SCMR 1041)", "Ali Azhar Khan Beloch (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.

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Announced
Dt: 03.09.2020

JUDGE

JUDGE

(01) 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 11-1
Copying
Total 14
Date of Preparation of copy 7/9/2020
Date of Delivery of copy 7/9/2020
Received By

[Signature]
CERTIFIED TO BE TRUE COPY
07 SEP 2020

ATTESTED

[Signature]

To,

The Director,
E&SE department,
Khyber Pakhtunkhwa, Peshawar.

Anxur F

36

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

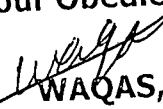
Respected Sir,

Most respectfully it is stated that I am the employees of your good self-department and performing my duty as DM at GHS Hadora Bandi, District Abbottabad quite efficiently and up to the entire satisfaction of my superiors. It is pertinent to mention here that all the other Primary School Teacher and Certified Teacher have the promotion criteria/quota to the post of SST, SST (General & Science). That service rules date 24.07.2014 and 24.04.2018 framed by the respondent Department no promotion quota has been allocated for promotion from the post of PST's and CT's (who has the qualification of B.Sc in Computer Science) to the post of (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.03 of the table by including/inserting the computer Science subject of the appellant in column No.03 and the impugned service rules dated 24.04.2018 may kindly be amended /modified to the extent of Serial No. 02 in column No. 05 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 appellant.

Dated: 20.10.2020

Your Obediently


WAQAS, DM
GHS Hadora Bandi, District Abbottabad

ATTESTED

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

_____ OF 2021

Waggs

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)

I/we Waggs

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

Waggs
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,
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Mobile No. **0345-9383141**