

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No: 7833/2021

Diary No. 3232

Dated 30-1-2023


Riaz Muhammad District Nowshera.....Appellant.

VERSUS

Director, E&SE Khyber Pakhtunkhwa & others.....Respondents

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Assistant Director (Lit: II)
E&SE Department, Khyber
Pakhtunkhwa, Peshawar.

1

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Service Appeal No: 7833/2021

Riaz Muhammad District Nowshera.....Appellant.

VERSUS

Director, E&SE Khyber Pakhtunkhwa & others.....Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth:-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the Appellant is not an aggrieved person within the meaning of Article-212 of the Constitution of Islamic Republic of Pakistan 1973.
- 3 That the instant Service Appeal is badly time barred under relevant provision of law of limitation Act 1908.
- 4 That the Appellant has concealed material facts from this Honorable Tribunal in the instant Service Appeal.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That this Honorable Court has got no Jurisdiction to entertain the present appeal.
- 9 That the instant Appeal is based on mala fide intentions, just to put extra pressure on the Respondents for gaining illegal service benefits for his promotion as SST (IT) in BPS-16 in violation of the Rules & policy in field as he is lacking the prescribed qualification of ADE (IT).

10 That the instant Appeal is not maintainable in its present form.

11 That the Appeal is bad for mis-joinder & non-joinder of the necessary parties.

ON FACTS.

- 1 That Para-1 needs no comments.
- 2 That Para-2 also needs no comments being pertains to the 1st appointment order as Computer Lab in charge BPS-7 vide order Notification dated 14-10-2014 attached as **Annexure-A**.
- 3 That Para-3 is correct that vide Notification dated 24-04-2017 attached as **Annexure-B**, service Rules for the Computer Lab in charge were framed & notified vide the said Notification by the Respondent No.3, wherein, vide S.No. 3 of the mentioned service structure for CT (IT) in BPS-12 has been framed, wherein the prescribed qualification for the appointment CT (IT) mentioned therein for perusal & ready reference.
- 4 That Para-4 is correct that vide Notification dated 27-02-2019 the service of the appellant was regularized against the CT (IT) post in BPS-12 by the Department which is attached as **Annexure-C**.
- 5 That Para-5 is also correct that vide Notification dated 28-05-2019 promotion order has been issued to the eligible CT (IT) in BPS-12 to the post of SST (IT) in BPS-16 in view of the criteria & policy notified on dated 24-04-2017 by the Respondent No.2 under the Rules & policy.
- 6 That Para-6 is incorrect on the grounds that DPC meeting & working papers dated 24-09-2020 does not accrued any legal right for promotion as SST (IT) in BPS-16 post on the grounds that the appellants does not possess the prescribed qualification of ADE (IT).
- 7 That Para-7 needs no comments.
- 8 That para-8 needs also no comments.
- 9 That Para-9 is correct that the appellants has not been considered for promotion as SST (IT) in BPS-16 post in view of the Rules notified on dated 24-04-2017 to the extent of that the appellant is lacking the prescribed qualification of ADE (IT) which is mandatory for promotion against the noted post.

- 10 That Para-10 is correct to the extent of order dated 02-08-2021 of the Respondent No.1 on the grounds of not fulfilling the condition No. II of the Service Rules dated 24-04-2017 in the Respondent Department.
- 11 That Para-11 is correct to the extent of order dated 03-08-2021, whereby, the order dated 02-08-2021 has been withdrawn by the Department under the Rules.
- 12 That para-12 is also incorrect & denied, hence, no further comments.
- 13 In reply to Para-13, the Appellant is not an aggrieved person within the meaning of Article-212 of the Constitution of Islamic Republic of Pakistan 1973, hence, the appeal in hand is liable to be dismissed on the following grounds inter alia:-

GROUND:-

- A. Ground A needs no comments.
- B. **Incorrect & not admitted**, the stand of the appellant is without cogent reason & legal justification, liable to be rejected by this Honorable Bench as act of the Respondent Department is in accordance with the provision of Law & Rules, whereby, the appellant has not been promoted as SST (IT) in BPs-16 post due to the lack of the prescribed criteria & qualification ADE (IT) as mentioned S. No. II in the Service Rules notified on dated 24-04-2017 by the Department, hence, the act which is legal & liable to be maintained.
- C. **Incorrect & not admitted**, the appellant is misleading the issue as he has been treated in accordance with Law & Rules.
- D. **Incorrect & not admitted**, hence, needs no further comments as detail reply to this ground has been given in the above mentioned paras.
- E. **Incorrect & not admitted**, the appellant is misleading the issue as he has been treated in accordance with Law & Rules & have not violated the provision of Article-4 & 25 of the constitution of 1973 in the instant case, hence, liable to be rejected.
- F. **Incorrect & not admitted**, as replied above.
- G. **Incorrect & not admitted**, needs no further comments as detail reply to this grounds has been given in the above mentioned paras.
- H. **Incorrect & not admitted**, the stand of the appellant is without cogent reason & legal justification, liable to be rejected.

- I. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated. / /2022.


DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 1 & 2)


SECRETARY

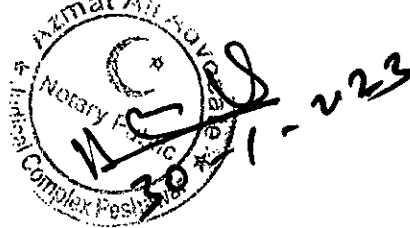
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 3)

AFFIDAVIT

I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief.


Deponent

ATTESTED





**IT/Computer Science Teachers and Computer Labs
Project in Khyber Pakhtunkhwa (Phase-II)**
Elementary & Secondary Education Department
Government of Khyber Pakhtunkhwa

(A)

Dated Peshawar the October 14, 2014

NOTIFICATION:

No.PM-IT/E&SE/1-3/Recruitment/Lab-Male/2014. Consequent upon recommendations of Departmental Selection Committee, the following Eighty Two (82) Male Candidates are hereby appointed as Computer Lab Incharges in BPS-07 (Rs. 5800-320-15400) plus usual allowances as admissible under the rules purely on contract basis with immediate effect from the date of their taking over charge up to 30-06-2015 or till the completion of the project whichever is earlier on the terms and conditions given at the end.

2. Upon their appointment as Computer Lab Incharges (BPS-07), they are posted against the vacant posts under the project "IT/Computer Science Teachers and Computer Labs Project in Khyber Pakhtunkhwa" in the Schools noted against their names:-

S#	NAME	FATHER NAME	DOMICILE	NIC#	CONTACT ADDRESS	NAME OF SCHOOL WHERE POSTED
1	SARDAR MUHAMMAD ALI	SARDAR KHURSHID	ABBOTTABAD	13101-5234863-3	KHURSHID STATIONARY NEAR GIRLS DEGREE COLLEGE ABBOTTABAD	GHS Kuthiala, Abbottabad
2	MUHAMMAD MUNEEB	KHALIQ DAD	ABBOTTABAD	13101-0467231-5	NEW MUSLIM HOTEL OPVZ SP OFFICE KUTCHERY ROAD ABBOTTABAD	GHS Samundar Katha, Abbottabad
3	MUHAMMAD ILYAS	MUHAMMAD IQBAL	ABBOTTABAD	13101-4110384-3	MOHALLA FAROOQ E AZAM, LAMBA MAIRA ROAD POST OFFICE JHANGI ABBOTTABAD	GHSS Birale, Abbottabad
4	ZAHID ALI	ABDUL WAHID	ABBOTTABAD	13101-4039070-1	H NO 3153 DEPOT ROAD HAVELIAN ABBOTTABAD	GHS No.1 Havelian, Abbottabad
5	KHAWAR	MUHAMMAD YOUNAS	ABBOTTABAD	13101-2098007-5	HOUSE NUMBER TC-497, MUHALLAH MUHAMMAD ZAI NAWANSHER TEHSIL AND DISTRICT ABBOTTABAD	GHSS Nawanshehr, Abbottabad
6	KHALIL REHMAN	GUL HABIB KHAN	BANNU	22201-3695161-1	MADRSA MOBILE CENTER NEAR BATEHA KHAN CHOWK DOMEL BANNU	GHSS Domel, Bannu
7	HAMID KHAN	SHER ZAMAN	BANNU	11101-7327544-8	HOUSE NUMBER 679/C MOHALLAH GOPA KHEL NEAR MILAD PARK BANNU CITY	GHS No.1 Bannu City
8	MUHAMMAD YASIR KHAN	MUHAMMAD BAKHSH KHAN	BANNU	11101-6480236-9	HOUSE NUMBER 71/D MOHALLAH MUHAMMAD JAN BANNU CITY	GHS No.2 Bannu City
9	SADIQ HUSSAIN	ABID ULLAH	BANNU	11101-9725410-3	HOUSE NUMBER 02 R.H.C HOSPITAL DOMEL BANNU	GHS Azim Killa, Bannu
10	UBAID ULLAH SAEED	MUHAMMAD SAEED	BATTAGRAM	13202-0395647-3	ALI STATIONERS CHOWK BAZAR BAFFA MANSEHRA	GHS Dagai, Battagram
11	AKMAL KHAN	SHERZADA	BUNER	15101-8208644-1	VILLAGE MALAKPOOR POST OFFICE PRBABA TEHSIL DAGGAR DISTRICT BUNER	GHS Karapa, Bunner
12	SHAHID ALI	SHER AMAN	BUNER	17301-1973403-7	THE BRADFORD COLLEGE BEHIND GUL HAJI PLAZA UNIVERSITY ROAD PESHAWAR	GHSS Nagrai, Bunner
13	MUHAMMAD ALI	BAKHT JAMAL	BUNER	15101-0608910-3	VILLAGE DAGAI POST OFFICE TOTALAI TEHSIL TOTALAI DISTRICT BUNER VIA SWABI	GHS Dagai, Bunner
14	MUHAMMAD IBRAR	ESA KHAN	CHARSADDA	17101-4958816-9	CHARSADDA INSTITUTE OF TECHNOLOGY SHABQADAR DISTRICT CHARSADDA	GHS Battagram, Charsadda
15	IMRAN KHAN	MUTEEL UL HAQ	CHARSADDA	17101-5687464-9	VILLAGE AND POST OFFICE KATOZAI TEHSIL SHABQADAR DISTRICT CHARSADDA	GHS Kato Zai, Charsadda
16	MOHAMMAD IMRAN	MOHAMMAD ISMAIL	CHARSADDA	21406-1827486-7	LG 447 DEANS TRADE CENTER PESHAWAR CANTT	GHS Shabqadar Fort, Charsadda
17	AJMAL SHAH	MUSAHIB SHAH	CHARSADDA	17101-2659915-1	MOHALLAH MUHAMMAD ZAI VILLAGE AND POST OFFICE RAJJAR TEHSIL AND DISTRICT CHARSADDA	GHS No.1 Rajjar, Charsadda
18	SANA ULLAH	FAZLI MAULA	CHARSADDA	17101-4908805-5	MOHALLAH BAMAD KHAIL VILLAGE AND POST OFFICE UMARZAI DISTRICT CHARSADDA	GHSS Umer Zai, Charsadda
19	AHMAD NAWAZ	MUHAMMAD NAWAZ	CHITRAL	15201-3144069-3	LG 447 DEANS TRADE CENTER PESHAWAR CANTT	GHSS Morlashi, Chitral
20	RIFFAT ABBAS ADEEL	GHULAM SADIQ	DERA ISMAIL KHAN	12101-7736131-1	MAMIA COLONY NEW BANNU CHUNGI KACHI PAIND KHAN DERA ISMAIL KHAN	GHS Bitot Sharif, D.I.Khan

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Appointment Order of Male Computer Lab Incharges (BPS-07)

21	MUHAMMAD ILLIYAS KHAN	MUREED ABBAS	DERA ISMAIL KHAN	12103-7773018-7	VILLAGE NEW CHOORA POST OFFICE BILOT SHARIF TEHSIL PAHARPUR DISTRICT DERA ISMAIL KHAN	GHSS Dhakki, D.I.Khan
22	ABID HUSSAIN	RAB NAWAZ	DERA ISMAIL KHAN	12103-3988023-7	VILLAGE POST OFFICE KATH GARH TEHSIL PAHARPUR DISTRICT DERA ISMAIL KHAN	GHSS Kath Garh, D.I.Khan
23	MUHAMMAD ASAD	HAJI MUHAMMAD HUSSAIN	DERA ISMAIL KHAN	12103-1001210-7	SHAMA GENERAL STORE MAIN BAZAR PAHARPUR DERA ISMAIL KHAN	GHSS No.1 Paharpur, D.I.Khan
24	MALIK MUHAMMAD WASIM JAVED	MALIK JAVED HUSSAIN	DERA ISMAIL KHAN	12101-3469783-9	TELEPHONE COLONY NEAR DISTT COURTS DERA ISMAIL KHAN	GCMHS No. 1 D.I.Khan
25	SHAHID ZEB	RAHIM ZADA	DIR LOWER	15307-4651619-9	VILLAGE ALI MAST POST OFFICE UOM RAMORA TEHSIL ADENZAI DIR LOWER CHEKDARA	GHSS Chakdara, Dir Lower
26	UMAR WAHID KHAN	BUNAIR GUL	DIR LOWER	15302-4847352-5	VILLAGE SALIGRAM POST OFFICE RABAT DISTRICT LOWER DIR TEHSIL BALAMBAL	GHSS Rabat, Dir Lower
27	BEHRAM KHAN	SHAH WAZIR KHAN	DIR LOWER	15303-4646507-3	VILLAGE SARIE TEHSIL AND POST OFFICE SAMARBAGH CARE OF AKHOONZADA MEDICOSE SAMARBAGH LOWER DIR	GHSS Samarbagh, Dir Lower
28	MUHAMMAD RAHIM	RAHMAT KHAN	DIR LOWER	15305-3481257-5	ZAMDARA MAIDAN TEHSIL LAL QILLA DISTRICT DIR LOWER	GHSS Ziamdara (maidan), Dir Lower
29	HABIB UN NABI	KHALIL AHMAD	DIR UPPER	15701-8217264-7	VILLAGE MAINA DOAG UIC DOAG DARA POST OFFICE SHERINGAL UPPER DIR	GHSS Sheringal, Dir Upper
30	INAYAT ULLAH	AMAN ULLAH KHAN	DIR UPPER	15307-7787337-5	FLY WORLD INTERNATIONAL, BAHADAR KHAN PLAZA BATHKHAELA	GHS Nehag, Dir Upper
31	MUHAMMAD RIZWAN	PIYO SADDIQUE	HANGU	14101-9423512-7	DISTRICT AND TEHSEEL HANGU POST OFFICE SAROZAI MOHALLAH ALI SHER KHEL ASHRAF GAS SHOP	GHSS Doaba Hangu
32	RAFI ULLAH SHAH	MISAL KHAN	HARIPUR	13302-4298847-9	DISTRICT AND TEHSIL HARIPUR, POST OFFICE GUDWALIAN, VILLAGE NEW BAKKA, HARIPUR	GHSS Central Jail, Haripur
33	NAVEED KHAN	SAJAWAL KHAN	HARIPUR	13302-6533849-5	VILLAGE CHACHA POST OFFICE KAILAG DISTRICT AND TEHSIL HARIPUR	GHSS Panian, Haripur
34	SAIF UR REHMAN	ABDUL MAJEED	HARIPUR	13302-4952519-9	AAA COMPUTER SHOKAT PLAZA GT ROAD HARIPUR	GHSS Bagra, Haripur
35	MUHAMMAD TARIQ	MUSHTAQ AHMED	HARIPUR	13302-4181029-5	KHANDAQ POST OFFICE NAJI BULLAH HARIPUR	GCMHSS Kot Najibullah, Haripur
36	MUDASSIR IQBAL	NASEEB UR RAHMAN	KARAK	19202-1967012-9	COLONY HASSAN ABAD VILL AND PO LATAMBER KARAK	GHSS Warana, Karak
37	ZAFAR YASEEN	MUHAMMAD YASEEN	KARAK	14203-2169824-1	ZAFAR YASEEN CARE OF HAZRAT YASEEN HBL BRANCH CODE 1780, AHMAD ABAD, DISTRICT KARAK	GHSS Shah Salim, Karak
38	MUHAMMAD KASHIF	WAHID NAWAZ	KARAK	14203-7757408-7	VILALGE PO AND TEHSIL TAKHAT E NASRATI DISTT KARAK	GHS Takhata-Nasrat, Karak
39	FAISAL AYAZ KHAN	MUHAMMAD AYAZ KHAN	KARAK	14201-3479989-7	VILLAGE TEHSIL AND POSTOFFICE BANDA DAUD SHAH KARAK	GHS Ahmadj Banda, Karak
40	KHALID USMAN	ABDUL QADEEM	KOHAT	14301-9908687-5	AFAQ SCIENCE SCHOOL AND COLLEGE SHAKAR DARA P O SHAKAR DARA	GHSS Lachi, Kohat
41	GHER KHAN	ARIF KHAN	KOHAT	54400-4542278-7	VILLAGE AND POST OFFICE CHORLAKI KOHAT KOHAT	GHS Chorlaki, Kohat
42	SYED WASEEM ABBAS	SYED RAZA HUSSAIN	KOHAT	21603-3770082-3	LANDI KACHAI DISTRICT KOHAT	GHSS Uster Zai Payan, Kohat
43	ANWAR UL HAQ	ABDUL HAQ JANBAZ	KOHISTAN	15602-7302415-3	OLD POST OFFICE ROAD ROBI GENERAL STORE RANYMUHALLAH MINGORA, SWAT	GHS Paltan, Kohistan
44	ASMAT ULLAH	HAZRAT GHULAM	LAKKI MARWAT	11201-9909878-9	FARHAN MOBILE AND COMPUTER SHOP NEAR KARGAL CHOWK EIDGAH ROAD LAKKI MARWAT	GHS Ahmad Khel Lakki Marwat
45	ABDUL MATEEN	GULISTAN	LAKKI MARWAT	11201-4289064-3	MOHALLAH GHAZI KHAN KHEL POST OFFICE ABBA KHEL LAKKI MARWAT DISTRICT LAKKI MARWAT	GHSS Abba Khel, Lakki Marwat
46	MATI ULLAH KHAN	MUHAMMAD ASLAM KHAN	LAKKI MARWAT	11201-7775325-7	ASIF USMAN STENOGRAPHER STI ESTABLISHMENT DEPARTMENT BENEVOLENT FUND PESHAWAR	GHSS Taj, Zai, Lakki Marwat
47	ZESHAN UR RAHMAN	ARJUN RAHMAN	MALAKAND	15402-7842033-3	VILLAGE AND P O JILLAGRAM MOHALLAH GAZE KHAIL TEHSIL BATHKHELA DISTRICT MALAKAND	GHSS Dheri Jilagram, Malakand
48	AKBAR ALI	FAZAL BAZ	MALAKAND	15402-9649340-1	VILLAGE AND POST OFFICE KOT DARGAI	GHSS Kot, Malakand
49	ADNAN KHAN	ALAM ZEB	MALAKAND	15402-4827837-1	MOHALLA SHAHEEDON VILLAGE AN POST OFFICE THANA TEHSIL BATHKHELA DISTT MALAKAND	GHS Thana No.1, Malakand
50	MUHAMMAD ADIL	MUHAMMAD NIAZ	MANSEHRA	13502-7373208-1	MOHALLAH GAGHMAIL VILLAGE AND POST OFFICE KHAKI DISTRICT AND TEHSIL MANSEHRA	GHS Bairda, Mansehra
51	HAMAD ALI	ABDUL RASHID	MANSEHRA	13503-8200130-3	MOHALLAH MUFTIABAD DHERI MANSEHRA	GCMHS No. 3 Mansehra
52	MUHAMMAD KHALID ZUBAIR	NOOR HABIB	MANSEHRA	13504-3826567-3	POST OFFICE DILBORI VILLAGE PIRPATTAN MANSEHRA	GHS Dilbori, Mansehra

Appointment Order of Male Computer Lab Incharges (BPS-07)

53	BASHARAT HABIB	MOLVI HABIB UR REHMAN	MANSEHRA	13503-5961611-1	BASHARAT HABIB C/O MUHAMMAD TARIQ GOVERNMENT COLLEGE OF MANAGEMENT SCIENCE MANSEHRA	GHS Phulra, Mansehra
54	MUHAMMAD RASHID	MAQBOOL UR REHMAN	MANSEHRA	13504-5609213-7	VILLAGE CHUJAR PAIN POST OFFICE CHAJJAR BALA TEHSIL OGHI DISTRICT MANSEHRA	GHS Shamdhara, Mansehra
55	MIAN ABDUL WAJID	MIAN MUHAMMAD HUSSAIN	MANSEHRA	13501-0637017-1	VILLAGE PD JABRI KALEESH VIA GARHI HABIB ULLAH TEH BALAKOT MANSEHRA	GHS Shohal Maazullah, Mansehra
56	MAJID KHAN	MUHAMMAD AJMAIL	MANSEHRA	13503-6885530-5	VILLAGE BAJNA POST OFFICE BAJNA (SHINKIORI) DISTT AND TEHSIL MANSEHRA	GHS Bajna, Mansehra
57	HALEEM SAID	GUL SAID	MARDAN	16101-1053100-9	KHUDA NOOR KALLI KAYLANG ROAD, ROAD MARDAN P.O NO 23200	GHS Naseer Kili, Mardan
58	ABDULLAH KHAN	INAYAT ULLAH KHAN	MARDAN	16101-9654126-1	MOHALLAH LANDAKI HOTI MARDAN	GHS Gul Bagh (Hoti), Mardan
59	ZAHOR KHAN	AURANG ZEB	MARDAN	16101-1327681-3	VILLAGE AND PO MEHMOOD ABAD UC GUMBAT GHANI KAPORA MARDAN	GHS Gumbat, Mardan
60	MUHAMMAD NAVEED	ALI SHER	MARDAN	16101-7819989-1	IQRA SCHOOL AND COLLEGE SAWARI DIST BUNNER	GHS Rustam, Mardan
61	JIBRAN AHMAD DURRANI	ANWAR GUL DURRANI	NOWSHERA	17201-7671490-7	MOHALLAH HAJIABAD VILLAGE P O SHAIDU TEHSIL AND DISTRICT NOWSHERA	GHSS Manki Shanf, Nowshera
62	SAEED AHMAD	MUHAMMAD YOUNAS	NOWSHERA	17201-8164546-3	MERA MISRI BAND MOHI HAFIZABAD P/O AKORA KHATTAK NOWSHERA	GHS Msn Eanda, Nowshera
63	MUHAMMAD SOHAIL	GHULAM ILYAS	NOWSHERA	17201-2172272-5	HOUSE NO 289/1 3 MAIN BAZAR NOWSHERA CANTT NOWSHERA	GHS No. 2 Nowshera Cantt
64	SHAMS UD DIN	IHSAN UR REHMAN	PESHAWAR	17301-1677165-9	MDH KANDY PAYAN VILLAGE AND POST OFFICE LANDI ARBAB PESHAWAR	GHSS No. 1 Peshawar Cantt
65	YOUSAF ALI	MOHABAT KHAN	PESHAWAR	17301-0837384-9	VILLAGE HAJ ZAI POST OFFICE MATHRA WARSAK ROAD PESHAWAR	GHSS Chaghar Mati, Peshawar
66	AAMIR ULLAH	SAHIBZADA NASRULLAH	PESHAWAR	17301-7849337-1	C/o Mohammad Usman (Lecturer), English Department, University of Peshawar	GHS Gulshan Renman Colony, Peshawar
67	ADNAN SHARIF	MUHAMMAD SHARIF	PESHAWAR	17301-5948784-5	HOUSE NUMBER 2363 MOHALLAH POSTEEN DOZAN JAHANGIR PURA PESHAWAR	GHSS No. 3 Peshawar City
68	RAB NAWAZ KHAN	MUHAMMAD MISKEEN KHAN	PESHAWAR	17301-5254913-7	VILLAGE LALA POST OFFICE TARNAB FARM PESHAWAR	GHS Tarnab Farm, Peshawar
69	WAQAS AHMAD	SHAMS UR REHMAN	PESHAWAR	17301-0354834-3	EBM SHOP NO 20 GROUND FLOOR GUL HAJI PLAZA UNIVERSITY ROAD PESHAWAR	GHS Landi Arbab, Peshawar
70	ABDUL GHANI KHAN	MUHAMMAD SADIQ	PESHAWAR	17301-1889185-1	HAJI ZAI STOP NEAR ISLAMIA PUBLIC SCHOOL POST OFFICE MATHRA WARSAK ROAD PESHAWAR	GHS Mathra, Peshawar
71	SAFEERULLAH	SAMEENULLAH	PESHAWAR	17301-6944869-5	MULLA GORI ROAD SHAH GAI THANA SAFAID SUNG PESHAWAR	GHSS Tehkal, Peshawar
72	ATTAULLAH	CHARI GUL	SHANGLA	15501-7269595-1	VILLAGE BASI POST OFFICE TEHSIL ALPURA DISTRICT SHANGLA	GHS No.2 Alpura, Shangla
73	ASID ALI	FAZAL KHAN	SWABI	16201-3068606-3	VILLAGE SALAH POST OFFICE MANKI TEHSIL CHOTA LAHOR SWABI	GHS Lahor Gharbi, Swabi
74	MUHAMMAD ISRAR	MUZAMMIL KHAN	SWABI	16202-7652854-9	OLD GANDAF ROAD DOCTOR GUL BADSHAH CLINIC TOPI SWABI	GHSS Chanai Gadoon, Swabi
75	ARIF HUSSAIN	IQBAL SHAH	SWABI	16201-9258080-5	MOH MIANGAN VPD TEHSIL LAHORE DIST SWABI	GHS Lahor Gharbi, Swabi
76	FARRAN ALI	FAZAL TAWAB	SWABI	16202-9848704-7	VILLAGE AND POST OFFICE PABAINI DISTRICT AND TEHSIL SWABI MOHALLAH SHEKHAN SWABI	GHS Pabaini, Swabi
77	MUHAMMAD HUMAYUN	RAHIM ULLAH	SWABI	16202-7473611-5	EDUCATION COLONY NEAR GOVERT GIRLS HIGH SECONDARY SCHOOL RADY SNIFA PESHAWAR	GHS Panj Pir, Swabi
78	ABDULLAH	HABIBUR RAHIM	SWAT	15602-8448523-7	VILLAGE AND POST OFFICE HAZARA KASAL SWAT	GHS Qalagay, Swat
79	GAVIKHAN	SHARZADA	SWAT	15602-2811769-7	A TO Z GENERAL STORE TAHIR ABAD MINGORA SWAT	GHS Mingora No. 1, Swat
80	ISHAQ AHMAD KHAN	FAZAL WAHAB	SWAT	15602-8719326-5	VILLAGE KOKRAI P O SAIDU SHARIF SWAT	GHS Islampur, Swat
81	HUSSAIN AHMAD	MUHAMMAD	SWAT	15602-8383466-5	BILAL GENERAL STORE SHAHDARA WATKY MINGORA SWAT	GHS Nawakalay, Swat
82	ABDULLAH KHAN	YAGUS KHAN	TANK	12201-7571162-9	MOH FAZL I IAH COLONY BANNI ROAD NEAR GOVT. DEGREE COLLEGE TANK	GCMHS NO. 1 Tank

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TERMS AND CONDITIONS:

1. Their appointment is purely on contract basis and they will have no claim/right what so ever for regularization etc. Their services under the present contract shall not qualify them for pension/gratuity.
2. Their services can be terminated at one month notice without any reason. In case they wish to resign at any time, one month's notice will be necessary or in Lieu thereof one month's pay shall be forfeited.
3. Their services will be liable to termination without any notice if their performance is not found satisfactory subsequently.
4. They will produce a medical certificate of fitness from the concerned Civil Surgeon/Medical Superintendent.
5. They will be governed by Provincial Government Rules concerning contract appointment as amended from time to time.
6. Their academic documents will be verified by the District Education Officer (Male) concerned. If found fake their services will be terminated and they will be proceeded against under the law.
7. Their pay will be released subject to the condition that their academic documents are verified by the District Education Officer (Male) concerned.
8. Their appointments are School based and non-transfer able.
9. Their joining time of this offer is 30 days failing which, the offer will stand cancelled and the next candidate on merit list will be considered for appointment.
10. They will submit Charge Report to all the concerned.

Note:-

- i. Notification can be downloaded from the E&SE Department website www.kpese.gov.pk
- ii. No TA/DA will be allowed to the appointees for joining their duty.

**PROJECT MANAGER,
IT/COMPUTER SCIENCE TEACHERS AND COMPUTER LABS
PROJECT (PHASE-II), E&SE DEPARTMENT, GOVERNMENT OF
KHYBER PAKHTUNKHWA**

Copy for Information to:

1. Accountant General of Khyber Pakhtunkhwa Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officers Concerned.
4. District Education Officers (Male) Concerned.
5. Principals/Head Masters of the Schools Concerned.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PA to Additional Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. PA to Chief Planning Officer, E&SE Department, Khyber Pakhtunkhwa.
9. Official concerned.


(SALAHUDDIN)
PROJECT MANAGER

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the April 24, 2017.



NOTIFICATION

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)	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	a) Fifty percent by promotion on the basis of seniority-cum-fitness from amongst the Secondary School Teacher-IT with at least five years service; and b) Fifty percent by initial recruitment: Provided that if no suitable candidate is available for promotion, then by initial recruitment.

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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-II with five years service as such and having the qualification prescribed for the post of Secondary School Teacher-II.</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.

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.

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5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Registrar, Peshawar High Court Peshawar.
7. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
8. The Director of Education (FATA) Peshawar.
9. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
10. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
11. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
12. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
13. The Deputy Director, EMIS (E&SE) Department Khyber Pakhtunkhwa Peshawar.
14. All District Education Officers (Male & Female) in Khyber Pakhtunkhwa.
15. All District Accounts Officers in Khyber Pakhtunkhwa.
16. All Agency Education Officer in FATA.
17. All Agency Accounts Officers in FATA.
18. All the Principal/Head Master/Head Mistress concern.
19. PS to Governor Khyber Pakhtunkhwa. Peshawar.
20. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
21. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
22. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
23. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
24. Master file

(YASIR QAYYUM)
SECTION OFFICER (GEN)



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OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) E&SE CHARSADDA

091-2220481 mehchursadda@yahoo.com

Notification.

In pursuance of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Amendment Act, 2018 (Appointment and Regularization of Services Act, 2017, Khyber Pakhtunkhwa Act No.1 of 2018) & Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO(SM)E&SED/1-85/SS-IT/2018-19 Dated Peshawar the February 13, 2019 & Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa No.6310-43/F.No.IT Regularization Dated Peshawar the 27/02/2019, the services of the following Computer Lab Incharge (CT-IT BPS-12) appointed in 2014 through NTS on Project basis vide Order No.PM-IT/E&SE/1-3/Recruitment/Lab-Male/2014, Dated Peshawar the October 14, 2014, under project Scheme "IT/Computer Science Teachers and Computer Labs Project in Khyber Pakhtunkhwa (Phase-II)" are hereby regularized as CT-IT BPS-12 posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment in the interest of public service..

Sr.No.	Name	Father Name	CNIC No.	School
01	Imran Khan	Mateer Ul Haq	17101-5687464-9	GHS Katozai P/Code:80732656
02	Muhammad Ibrar	Esa Khan	17101-4958816-9	GHSS Battagram P/Code:80732649
03	Muhammad Imran	Muhammad Ismail	21406-1827486-7	GHSS Umarzai P/Code:80732651

TERMS & CONDITIONS.

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, and Instructors & Doctors) Regulatory Act, 2011 and such rules & regulations as may be issued from time to time by the Government.
2. Their services shall be considered regular and they shall be eligible for pension / deduction of GP Fund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
3. Their services are liable to termination on one months' notice from either side in case of resignation without notice; their one month's pay/allowances shall be forfeited to the Govt.
4. They shall possess the same qualification and experience required for a regular post.
5. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.

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ANNEXURE - E

Directorate of Elementary and Secondary Education P-15
Khyber Pakhtunkhwa Education Department



NOTIFICATION

To be substituted with the same No. and date.

Consequent upon the recommendations of the Departmental Promotion Commission and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(G)/E&SE/1-85/1.T/2017 dated 24th April 2017, the following GTS (IT), BS-12 are hereby promoted to the post of SST (IT) BS-16 and posted against the vacant post of SST (IT) in the School noted against each BPS-16 (Rs. 18010-19200) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below in the interest of Public Service with immediate effect.

Sr. No.	S.L. No.	Name of Official & Present Place of Posting	Date of Birth	Domicile	Date of Appoint. as Regular CT/IT	Proposed place of posting	Remarks
1		Ferman Ullah Khan GHS D.Ahmad Khan Bannu	13/27/1979	Bannu	1/9/2004	GHS Bazar Ahmad Khan Bannu	Against Vacant Post
2		Aziz Ullah O/A E&SE Department	13/10/1980	Peshawar	1/9/2004	GHS PAF Shabeen Camp Peshawar	Against vacant post after actualization of, he will rejoin the present post in E&SE Department
3		Amir Ullah Rehman GHS Gandorh Khattak Karak	20/10/1977	Karak	1/9/2004	GHS Gandorh Khattak Karak	Against Vacant Post
4		Dawlat Khan Hussain GHS Julegram Malakand	11/3/1981	Malakand	1/9/2004	GHS Julegram Malakand	-/-
5		Mahmood Shah GHS Bannu	3/11/1973	Malakand	1/9/2004	GHS No.1 Dagan Malakand	-/-



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P-16

SSI (47) Promotion order 1997

17	Muhammad Ishaq GHS Barahan Kalan Tal Khan	15/2/1973	Dikhan	1/9/2001	GHS Barahan Kalan Tal Khan	do
18	Muhammad Nure GHS No 2 Manselwa	19/1/1975	Manselwa	1/9/2001	GHS Manselwa	do
19	Devan Rashid GHS S/Nourany Lakki	12/11/1975	Lakki Marsial	1/9/2001	GHS Lakki Marsial	do
20	Sahir Shah GHS Aman Kot Swat	1/1/1981	Swat	1/9/2001	GHS Aman Kot Swat	do
21	Saeed Ahmad Khan GHS Paron Dikhan	10-10-1977	Dikhan	1/9/2001	GHS Paron Dikhan	do
22	Gohar Ali Shah GCMHS Timargora Dir Lower	20/3/1980	Dir Lower	15/4/2001	GHS Timargora Dir Lower	do
23	Jinnat Ullah GHS Khudt Zar Kohat	1/4/1979	Kohat	15/4/2001	GHS Khudt Zar Kohat	do
24	Lutfillah GHS Mandain Swat	13/4/1982	Swat	15/4/2001	GHS Mandain Swat	do
25	Rasool Durrani GHS Karbogha Hangu	1/9/1979	Hangu	15/4/2001	GHS Karbogha Hangu	do
26	S.Kashif Hussain Shah GSI HCMHS No 4 Peshawar Cantt	4/3/1977	Peshawar	15/4/2001	GSI HCMHS No 4 Peshawar Cantt	do
27	Ayub Khan GHS Gandagar Dir Upper	12/4/1983	Dir Upper	29/6/2001	GHS Gandagar Dir Upper	do
28	Muhammad Khalid GHS Khatmud Dir Lower	1/4/1978	Dir Lower	10/2/2001	GHS Khatmud Dir Lower	do
29	Nasir Khan GHS No 1 Mingora Swat	1/1/3/1976	Swat	10/2/2001	GHS No 1 Mingora Swat	do
30	Ibrar Ahmad GHS Bandi Dhimshan Abbottabad	14/4/1983	Abbottabad	10/2/2001	GHS Bandi Dhimshan Abbottabad	do

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SST (IT) Promotion order KJ

17	Muhab Alam G.H.S.S. Guwahat Kohat	10/21/1982	Kohat	10/21/200	G145 Nasral Khet Kohat	do
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Terms and conditions:-

- They would be on probation for a period of one year extendable for another one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned.
- Their Inter-Se-seniority on lower post will remain intact.
- No TA/DA is allowed for joining his duty.
- They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
- Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl. No. 7248/Enc No. 03/Promotion to SST (IT) B-16

Dated Peshawar the 25-05-2019

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. District Education Officer (M) concerned
3. District Accounts Officer concerned
4. Section Officer (Primary) E&SE Department, Peshawar
5. Principals concerned
6. Official concerned
7. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department
8. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar
9. M/ File


Dy. Director (E&SE)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar


21/5/19