


# FORM OF ORDER SHEET

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

**Appeal No.** 1750/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1-	25/08/2023	<p>The appeal of Mr. Ashfaq Ahmed is re-submitted today by Mr. Imran Younas Khan Tanoli Advocate. It is fixed for preliminary hearing before Single Bench at Abbottabad on</p> <p>By the order of Chairman  REGISTRAR</p>

**BEFORE THE COURT OF RENT CONTROLLER,**  
**PESHAWAR**

*Ashfaq Ahmad*  
**VERSUS**

Government and others

**REPLY TO THE OBJECTION OF BEHALF OF THE**  
**APPELLANT.**

*Respectfully Sheweth:*

*That the appellant submits as under:-*

- 1- That the appellant filed the service appeal of seniority within time before the office of the Registrar Service Tribunal Peshawar.
- 2- That the office of the Registrar Service Tribunal Peshawar has raise the objections 1 to 10 to remove accordingly. Appellant has removed the all objections as under:-
  - i. Check list as attached with appeal.
  - ii. Affidavit is attested.
  - iii. Annexures of appeal are attested.
  - iv. Copy of recommendation letter in respect of appellant is not provided respondent No. 3 who will provided at the time of court demand.
  - v. Copy of the impugned seniority dated 26.07.2022 and 31.12.2022 are same is attached.
  - vi. Annexure-B of the appeal is necessary documents are attached original seniority list of appellants are a lot of pages which is not easy attached every appeal they will provided before the Court on need basis.
  - vii. Annexure of the appeal readable attached.
  - viii. Addresses of respondents are completed.
  - ix. Wakalat Nama is completer attached. (x) Departmental appeal is complete
  - (x) 293 more copies of appeal is not easy attached. At the time of admission/preliminary arguments permission ~~has~~ will have been granted by court to advertisements on the lead newspaper to inform the respondent.

**It is, therefore, humbly prayed that on acceptance of instant objection is reply may be granted in favor of appellant.**

Dated 07/08/2023

*Ashfaq Ahmad*  
Appellant

Through

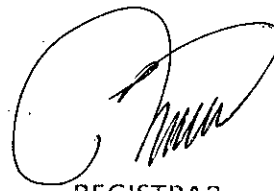
*Imran Younas Khan Tanoli*  
Advocate High Court,  
Peshawar

The appeal of Mr. Ashfaq Ahmad SST (G)GMS Beran Gali A.Abad received today i.e on 31.07.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Annexures of the appeal are unattested.
- 4- Copy of recommendation letter in respect of appellant mentioned in para-1 of the memo of appeal is not attached with the appeal be placed on it.
- 5- Copy of impugned seniority list dated 31.12.2022 is not attached with the appeal.
- 6- Annexure-D of the appeal is incomplete be completed.
- 7- Annexure-F of the appeal is illegible be replaced legible/better one.
- 8- Addresses of respondents nos. 122, 156, 190, 252, 261, 342, 368, 398, 407, 490, 494, 505, 520 & 596 are incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 9- Wakalat nama attached with the appeal is blank, be filled up.
- 10- Departmental appeal having no date be dated.
- 11- 507 more copies/sets of the appeal along with annexures i.e. complete in all respect be submitted with the appeal

No. 2069/S.T.

Dt. 01/08/2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Imran Younas Khan Tanoli Adv.  
High Court A.Abad.

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

Service Appeal No. 1750/2023

Ashfaq Ahmed SST (G), GHS Beran Gali, Abbottabad.

***VERSUS***

Secretary Elementary and Secondary Education Department, KPK and others.

**SERVICE APPEAL**

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Dated 31-17-2023

*Ashfaq*  
APPELLANT

Through

*Imran Younas Khan Tanoli*  
Imran Younas Khan Tanoli  
Advocate High Court Peshawar  
Abbottabad

Cantt plaza Abbottabad office No BC No. 102065  
Contact No. 0300-5649123

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**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA**  
**PESHAWAR**

Service Appeal No. 1750/2023

Ashfaq Ahmed SST (G), GHS Beran Gali, Abbottabad.

**Appellant**

***VERSUS***

1. Secretary Elementary & Secondary Education KPK Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. Chairman KPK Public Service Commission, KPK Peshawar.
4. MUSHTAQ AHMAD SST, GHS DELI MELA KARAK.
5. ABDUL LATIF SST GHS LABER KOT MANSEHRA.
6. ABDUL AHMAD SST GHS GOMAL KALAN D.I KHAN.
7. MUHAMMAD ABU BAKER RIZWAN SST GHSS NO. 2 ISLAMIA D.I KHAN.
8. MUHAMMAD NASEEM ULLAH KHAN SST GHS HAJI MORA D.I KHAN.
9. MASAM KHAN SST GHS AZAKHEL BALA NOWSHERA.
10. BAIT ULLAH SST GHS RAGHAGAN BAJAUR.
11. MUHAMMAD ASIE, NADEEM SST GMS JHOKE MACHI D.I KHAN.
12. ILYAS AHMAD SST GHSS MORILASHT CHITRAL.
13. KALEEM ULLAH SST GMS LUNDA PARA D.I KHAN.
14. MUHAMMAD AHSAN SST GHS S N KHAN HARIPUR.
15. MUHAMMAD IRFAN SST GHS CHEHKAN D.I KHAN.
16. SANA ULLAH SST GHS KUJU CHITRAL.
17. IFTIKHAR UL HASSAN SST GMS SAGGU SHUMALI D.I KHAN.
18. HASSAN ULLAH SST GMS DABAKOT MADI KHEL.
19. SHAFQAT AZIZ SST GHSS BAGRA HARIPUR.
20. BAKHT ZAMIN KHAN SST GHSS DOBIAN SWABI.
21. MUHAMMAD RAFIQ SIDDIQUE SST GHS KACHI KATH GHARH D.I KHAN.
22. RAFI ULLAH SST GHS K. HAKIM TANK.
23. AZMAT ULLAH SST GHS PARYAT NORTH WAZIRISTAN.
24. ASMAT ULLAH SST GHSS MINGORA SWAT.
25. TARIQ SST GHS GALOCH SWAT.
26. ULFAT ULLAH SST GMS LATAMBER KARAK.
27. BAKHT ANWAR SST GHS SIRSNARI SWAT.
28. MUHAMMAD ZAHIR ULLAH SST GHS UJNU CHITRAL.

29. AKHTAR JAN SST GOVT. SHAHEED UMAT HAYAT H.S.S CHARSADDA
30. ALI SHER KHAN SST GHS GHORIWALA BANNU.
31. MUHAMMAD RAZA SHAH SST GHS MUZGOLE CHITRAL.
32. MUHAMMAD ILYAS SST GHS TORU MARDAN.
33. FAHEEM KHAN SST GMS MOHSIN KHEL KOHAT.
34. MUHAMMAD SAQIB SST GHSS COMP BANNU.
35. UMAR KHITAB SST GHS M.M POLE MANSEHRA.
36. ZAHID HASHIM SAYAL SST GHS RATTA KULACHI D.I KHAN.
37. QAYUM KHAN SST GHS PARABAG CHITRAL.
38. MUHAMMAD TAQI SHAH SST GMS KHANA SHARIF D.I KHAN
39. TAJ BAR ALI KHAN SST GHS GHULAM JAN BAKA KHEL BANNU
40. ZULFIQAR SST GHSS TAJA ZAI LAKKI
41. MUHAMMAD AMINULLAH KHAN SST GMS KULACHI D.I KHAN
42. NOWSHAD KHAN SST GHS KHAR BAJAUR
43. SAEED AKBAR SST GMS RAMORA HATYAN MARDAN
44. IFTIKHAR AHMAD SST GHSS DHAKKI CHARSADDA
45. UMER HAYAT KHAN SST GHS DILASA KHAN MANDEW BANNU
46. SAYYED SAJJAD ALI SHAH SST GHS SHEIKH JANA SWABI
47. ISRAR UL HAQ SST GSSCMHS TANK
48. GHULAM RASHID SST GHS SHINGLI PAYEEN BATAGRAM
49. MUHAMMAD GHUFRAN ULLAH KHAN SST GMS MULTANI LANDIDAK BANNU
50. SHER SHAH SST GHSS SARAI BALA DIR LOWER.
51. ABID ULLAH SST GHS ZUHRAB GUL CHARSADDA
52. ISHTIAQ AHMAD SST GHS NILISHANG MANSEHRA
53. ABDUL WADOOD SST GHS SHABQADAR CHARSADDA
54. FAZAL GHANI KHAN SST GHS LAGHARAI MAMUND BAJAUR
55. RAHIM DAD KHAN SST GHSS MANIAL DIR LOWER
56. MANZOOR KHAN SST GHSS DARGAI CHARSADDA
57. MUHAMMAD BALIGH UD DIN SST GHSS DROSH CHITRAL
58. MURAD ALI SST GHSS MANDANI CHARSADDA
59. FAIZ ULLAH KHAN SST GHS SAAD ULLAH FR BANNU
60. ABDUL QADIR ALAMGIR SST GHS MATHRA PESHAWAR
61. MUAMBAR BACHA SST GHSS FATEHPUR SWAT
62. AFTAB UL HASSAN SST GHS MITHA KHEL KARAK

63. WALI REHMAN SST GHS DATTA KHEL NORTH WAZIRISTAN
64. JAMIL AHMAD SST GHS NO.3 MINGORA SWAT
65. MUHAMMAD NAZIR SST GHS TANG KHATTA BAJAUR
66. HAMEED RAZA SST GHSS BOGARA KARAK
67. MUHAMMAD SULTAN SST GHS BARKHAILOZO MAMUNDO BAJAUR
68. ZUBAIR AHMAD SST GHS BARKHAILOZO MAMUNDO BAJAUR
69. ALI HAIDER SST GOVT:SHAHEED ADIL SHAHZAD HIGH SCHOOL THANA
70. BASHIR AHMAD SST GHS LUND KHWAR MARDAN
71. MUHAMMAD ABRAR SST GHS BARINGAN MARDAN
72. MUHAMMAD AYUB KHAN SST GHS TOOP MANDAL BAJAUR
73. FAZLI NAEEM SST GHS MATWANI BUNIR
74. MUHAMMAD IRFAN SST GHS JERMA KOHAT
75. HAFIZ MUHAMMAD ABDULLAH NUMAIR SIRAJI SST GHS  
MUSAZAI SHARIF D.I KHAN
76. MUHAMMAD AYAZ KHAN SST GHS MATORA LAKKI MARWAT.
77. JEHANZEB KHAN SST GHS MULLA KILLI NOWSHERA.
78. FAZAL TAJ SST GHS SAMANDER GARHI NOWSHERA
79. NIAZ AHMAD SST GHS DROSH CHITRAL
80. RIZWAN HAIDER SST GMS DARA TOWN D.I KHAN
81. MUHAMMAD HANIF SST GHS BACHKEN AHMADZAI LAKKI MARWAT.
82. TARIQ MEHMOOD KHAN SST GHSS COMP BANNU
83. MUHAMMAD ARIF SST GHS BABOZAI KATLANG MARDAN
84. KHALIL UR RAHMAN KHAN SST GHSS NO. 2 D.I KHAN
85. SAMI ULLAH SST GMS AYAZ KOT NWA
86. QAZI ATTIQ UR REHMAN SST GCMHSS NO.1 HARIPUR
87. ZIA UL ISLAM SST GBHS KHAWARI MANSEHRA.
88. ZAFAR IQBAL SST GMS SHaidu NOWSHERA
89. ZAHID AHMAD SST GHS RAGHAGAN BAJAUR
90. ASMAT ULLAH KHAN SST ASED0 TANK
91. ZARWALI KHAN SST GHS MUHAMMAD ZAI KOHAT
92. UMAR GUL SST GMS NARAZA BAJAUR
93. FARMAN ULLAH SST GHSS MULLAZAI TANK
94. ZAHIR SHAH SST GHS TALHATA MANSEHRA
95. ABDULLAH SST GMS NAR SAMAND ADAMZAI LAKKI MARWAT.

96. SHAFIQ-UR-REHMAN ABBASI SST GHS NAMMAL, ABBOTTABAD.
97. UMER QIAZ KHAN SST GHS BHARATI MICHAN KHEL BANNU
98. AKHTAR GUL SST GMS BANGI KHAN MUGHALKHEL BANNU
99. AJMAL KHAN SST GMS MIR ASLAM LALOZAI BANNU
100. MUHAMMAD ILYAS SST GHS SHAMSHI KHAN DIR LOWER.
101. SHOAIB AKHTAR SST GHSS SHORKOT D.I KHAN
102. MUHAMMAD KHALID KHAN SST GHSS NO.2 D.I KHAN
103. FIDA MUHAMMAD SST GHSS MANKI SHARIF NOWSHERA
104. MUHAMMAD ISSA KHAN SST GHS SPIN NORTH WAZIRISTAN
105. RAHMAT JAN SST GHS DAB KOR MOHMAND AGENCY
106. ARIF ABDULLAH SST GHS BILOT SHARIF D.I KHAN
107. MUHAMMAD YOUSAF SST GHS SHOHAL MUZULLAH MANSEHRA
108. ZAFAR HAYAT SST GHS PANIALA D.I KHAN
109. MUHAMMAD NAJEEB SST GHSS LAL QILA DIR LOWER
110. ZAHID GUL SST GMS SHAHEED BABA BANNU
111. RASHID KHAN SST GHS MAMA KHEL BANOCHI BANNU
112. MUHAMMAD PERVIZ SST GHS KARORI MANSEHRA
113. ANWAR ALI SST GHSS RISALPUR NOWSHERA
114. JAVED IQBAL SST GMS JUNAI BAKA KHEL BANNU
115. QAISER MEHMOOD SST GMS THATHI AHMED KHAN, ABBOTTABAD.
116. MUHAMMAD ARIF SST GHS ZAKHI QABRISTAN NOWSHERA
117. HIDAYAT ULLAH SST GHSS YARIK D.I KHAN
118. MUHAMMAD HASNAIN SHAH SST GHS WANDA NADIR SHAH D.I KHAN
119. INA YATULLAH SST GHS TANGORA BUNIR
120. IMRAN ALI SST GHS PARKHO DHERI MARDAN
121. SARDAR HUSSAIN SST GMS AFZAL ABAD T.BHAI MARDAN
122. BURHAN ULLAH SST GHS SARAI NORANG Dist Larkki Marwat
123. ABDUL HAYE SST GHS SHABQADAR CHARSADDA
124. ASAD ALI SST GHS KUTAB GARI MARDAN
125. IMRAN KHAN SST GHS GUL ZAMIR KALAY, BARA MOHMAND AGENCY
126. HAMED SARWAR SST GHS BAZAR AHMAD KHAN BANNU
127. AMJAD ALI SST VILLAGE P.O HARYANKOT MALAKAND
128. IHSAN ULLAH SST GHS NO. 2 KULACHI D.I KHAN
129. GOHAR SAMIN JAN SST GHS NO. 1 KULACHI D.I KHAN



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130. KHAN BAHADAR SST GHSS BUGHDADA MARDAN
131. JAMSHED ALI SST GHS BAZAAR SWABI
132. IMDADULLAH SST GHSS LAL QILA DIR LOWER.
133. DAUD KHAN SST GHS TATTAR KHEL KARAK
134. ASGHAR KAMRAN SST GHS KOTLA SAIDAN D.I KHAN
135. NADEEM SOHAIL SST GHS NO.1 HAVELIAN, ABBOTTABAD.
136. IHSANUL HAQ SALEEM SST GMS TERICH PAYEEN CHITRAL
137. AMIN ULLAH SST GOVT SHAHEED ARHAM KHAN HIGH SCHOOL PESHAWAR.
138. HAFIZ MUHAMMAD ZULQARNAIN SST GHSS NO. 4 D.I KHAN
139. MUHAMMAD YASIR SST GHS HIMMAT D.I KHAN
140. MUHAMMAD AAMIR SST GHS HASSU KHEL NORTH WAZIRISTAN
141. ABDUL RAZAQ SST GHS HAIDER KHEL NORTH WAZIRISTAN
142. NOOR ZALI KHAN SST GMS NAWAB KOT NORTH WAZIRISTAN
143. MUHAMMAD IRFAN SST GMS PIR SAMAND KOT MUHAMMAD KHEL NORTH WAZIRISTAN.
144. ZAHEER AHMAD SST GHS MIRAN SHAH NORTH WAZIRISTAN
145. NAWAZISH ALI SST GHS PABBI NOWSHERA
146. MUSAFAR SST GHS CHAIL MIANDAM KHWAZAKHELA SWAT
147. MUHAMMAD HAMAYUN KHAN SST GHS TOTAKAN MALAKAND
148. SAMAR GUL SST GHS LAND AHMED KHEL LAKKI
149. MOHAMMAD FAKHRE-E-ALAM SST GHS TAKHT ABAD AWAL PESHAWAR
150. FARHAD KHAN SST GHS TANGI NO.2 CHARSADDA
151. SULTANUD DIN SST GHS BARUM OWIR CHITRAL
152. MUHAMMAD BACHA SST GHS LARAM DIR LOWER.
153. MURAD ALI SST GHS ZAHID ABAD MARDAN
154. MUHAMMAD NASEER SST GMS ASHRAF ABAD KHWAIZAI MOHMAND AGENCY
155. INAYAT UR REHMAN SST GHS.BERI BAGH PESHAWAR.
156. FAZAL RAHMAN SST BAJAUR ( Dist Bajaur )
157. MAQSOOD JAN SST GHS GARHI HAMMED GUL CHARSADDA
158. JAHAN DARAZ KHAN SST GHS HUKAM ZAD DARDARIZ BANNU
159. SHAMSUL ARIFIN SST GHS ATTAKAI SKF CHARSADDA
160. FAZL-I-SUBHAN SST GHSS RABAT DIR LOWER

161. MOINUD DIN SST GHSS BAHADUR KHEL KARAK
162. ARSHAD ULLAH KHAN SST GHS NAIMAT GARH, BANNU
163. MUHAMMAD KHALID KHAN SST GHS KOT GABAI GADOON SWABI
164. AKBAR ALI SST GMS ASIGI KALAY DIR LOWER
165. MUHAMMAD RAFIQ SST GHS TORWARSAK BUNIR
166. SAEED JAMAL SST GHSS GHURGHUSHTO BUNIR
167. BASHIR KHAN SST GHS MATTA SWAT
168. NIAZ AHMED SST GHS ALOOLI HARIPUR
169. MUHAMMAD MISBAH UL ISLAM SST GHS WANDA BARU LAKKI MARWAT
170. HILAL HUSSAIN SST GHS BAZDARA BALA MALAKAND
171. MANSOOR AHMAD SST GHS PARYAT NORTH WAZIRISTAN
172. AKHTAR MUNIR SST GMS SHAKARDARA SWAT
173. AFRAZ KHAN SST GMS SARDAD MANDEW BANNU
174. RIZWAN ALI KHAN SST GHS TALHATA MANSEHRA
175. AMIR RAHMAN SST GOVT: ZEESHAN SHAHEED HIGH SCHOOL DARGAI
176. ZIA UL HAQ SST GHS KHESHI BALA NOWSHERA
177. SAYYAD ALI SST GHS MACHI MARDAN
178. MUHAMMAD RABANI SST GHS BIZAN KHEL BANNU
179. JANAT MIR KHAN SST GHS DOSALI NORTH WAZIRISTAN
180. KHAN RAZIQ SST GHS KHESHKI BALA NOWSEHRA
181. ISMAIL KHAN SST GHSS LOT MALAKAND
182. AYAZ KHAN SST GHS MUSA DARA, FR PESHAWAR
183. HAFIZ RIAZ UD DIN SST GHS KHAT KILLI PRANG CHARSADDA
184. MALAK ZADA SST GHS KARORA SWAT
185. MUHAMMAD ZAHID ABBASI SST GHS KHAKI MANSEHRA
186. MUHAMMAD ZAHIR SST GHS TOOP MANDAL BAJAUR
187. JAMSHID KHAN SST GHS GARHI USMANI KHEL MALAKAND
188. MUHAMMAD ZIARAT GUL SST GHS NAWAN KILLI NOWSHERA
189. SAID NAWAZ SST GHSS CHANAI SWABI
190. KHALID UMAR SST GOVT: SHAHEED MUHAMMAD MUAZAM HIGH SCHOOL KADDI (Dist Swabi)
191. MUHAMMAD ABID SST GHS BAGHICHA DHERI MARDAN
192. MUHAMMAD NAWAZ SST GHS ZANGI KHEL LAKKI MARWAT
193. MUHAMMAD ZIA SST GMS KOSHT BALA CHITRAL
194. ASAD ALI SST GMS HAMZA RASHKAI NOWSHERA

195. ASHIQ ALI SST GHS NO. 2 PAHARPUR D.I KHAN
196. NIAMAT KHAN SST GHS NO.2 ABBOTTABAD
197. NASIB ZAD GUL SST GHS DEHRAI BUNIR
198. KHALID MEHMOOD SST GHS TRANGRI BALA MANSEHRA
199. MUHAMMAD IBRAHIM SST GHS DHERI SIKANDAR KHAN  
CHARSADDA
200. GUL ZAMAN SST GMS NAR OTAMGARH LAKKI MARWAT
201. JUMA KHAN SST GMS MOMI CHITRAL
202. SERI RAM SST GHSS TOTALAI BUNIR
203. AMIR SIYAB SST GHS BATTAGRAM CHARSADDA
204. FAZAL RAHIM SST GHS MIAN KALY DIR LOWER
205. AMIR HATAM SST GHSS CHAKDARA DIR LOWER
206. SADAQAT HUSSAIN SST GHS SHOHAL MAZULLAH MANSEHRA
207. KHURSHID ALI SST GHS NO.2 SAKHAKOT MALAKAND
208. INAM UR RAHIM SST GMS BARAWAL MALAKAND
209. HAYA NAWAB SST GMS BARSAFARAI BAJAUR
210. FAROOQ IQBAL SST GHSS HARNO AZIZABAD ABBOTTABAD
211. JAMSHAD AHMAD SST GHS HARYAN KOT MALAKAND
212. IBRAHIM KHAN SST GHS MANTOO F.R BANNU
213. ASIF KHAN SST GSSCMHS TANK
214. NASIR HUSSAIN SST GHS SHAHZADI DIR LOWER.
215. ABBAS QAYYUM SST GHSS KOT MALAKAND
216. SHOUKAT SST GHS PHAGORA BATAGRAM
217. MUMTAZ MUHAMMAD SST GHSS SHERPAO CHARSADDA
218. ZAKIR ULLAH SST GMS ZAKIRA KHURD DISTRICT SWABI
219. ARIF ZAMAN SST GSMGKCMHS NO.1 LAKKI MARWAT
220. MUHAMMAD FAROOQ KHAN SST GHS KHERZI TANK
221. INAYAT UR REHMAN SST GHS CHARPARIZA PESHAWAR
222. MUHAMMAD FIAZ SST GHSS BAFFA MANSEHRA
223. UMAR HAYAT SST GCMHS TIMERGARA
224. ZAKIR ULLAH SST GMS KHANUM ALI KHEL F.R. BANNU
225. IHSANULLAH KHAN SST GHS NO.3 BANNU
226. IHSANUD DIN SST GHS MADAK CHITRAL
227. ISHAQ AHMED SST GMS, SANDO GALI, ABBOTTABAD.

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228. MUHAMMAD RIAZ KHAN SST GHS M.AKBAR TANK
229. ASGHAR ALI SST GHS JULAGRAM MALAKAND
230. IMTAIZ ALI SST GHS GULI BAGH SAWAL BHER MARDAN
231. SHAFQAT ULLAH SST GHSS ABBA KHEL LAKKI MARWAT
232. SHAH ZAMIN SST GHS JALALA MARDAN
233. HABIB ULLAH KHAN SST GHS KOPER MALAKAND
234. IHSAN ULLAH SST GMS LARA BANDA BAJAUR
235. MAQSOOD AHMAD KHAN SST GHS AL-MOMIN BACHAKI JANI KHEL  
BANNU
236. MUHAMMAD QAISER SST GHSS NARI PANUS KARAK
237. MUHAMMAD ALI SST GMS GHUNDO BALA MALAKAND
238. IHSANUL HAQ SST GHSS LAL QILA DIR LOWER.
239. YOUNIS KHAN SST GHS TOOR KAKKI, BANNU
240. NAJEEB ULLAH SST GHS SHALOVER BARA KHYBER AGENCY
241. FATEH MUHAMMAD SST GHS KHESHKI BALAN NOWSHERA
242. SYED IFTIKHAR ALI SHAH SST GHS MITHA PUR D.I KHAN
243. MUMTAZ KHAN SST GHS GARA BUDHA TANK
244. NOOR HABIB SST GHS SHUKRULLAH HUSSAIN BANNU
245. KIFAYAT ULLAH SST GMS JALBAI SWABI
246. MUHAMMAD ZAHID SST GHS MISHTI BAZAR ORAKZAI AGY
247. ABDUL KARIM SST GHS AFZAL ABAD MANSEHRA
248. ASGHAR ALI SST GHS WARTAIR DARGAI MALAKAND
249. AMIR AHMAD SST GHS PANIALA D.I KHAN
250. FAZAL UR REHMAN SST GHS PAI TANK
251. IKRAM ULLAH SST GMS MUHAMMAD KHEL DALLO KHEL LAKKI  
MARWAT
252. AMJAD ALI KHAN SST GHS SWABI (Dist Swabi)
253. MUHAMMAD MASOOD KHAN SST GHS CHANDO MAIRA, ABBOTTABAD
254. MUHAMMAD TAHSEEN ULLAH SHAH SST GZSHS DARGAI MALAKAND
255. INAM UL HAQ SST GHS NO.2 SKHAKOT MALAKAND
256. KIFAYAT ULLAH KHATTAK SST GMS MONA KHEL KARAK
257. ABDUS SALAM SST GHS SAIKOT KARAK
258. SUBHAN UDDIN SST GHSS HAYA SERAI DIR LOWER
259. SHARAFAT ALI SST GHS JABBRIAN, ABBOTTABAD.
260. IMRAN KHAN SST GHSS CHAMTAR MARDAN

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(Dist NWTD Mardan Shad)

261. ZAHID ULLAH SST GHS DATTA KHAIL
262. FALAK NAZ SST GHS HOTI LANDAKI MARDAN
263. SHAH FAQIR SST GHSS ARANDU CHITRAL
264. MUHAMMAD AZIZ SST GHS PIPALIKST NORTH WAZIRISTAN
265. WASIF UR REHMAN SST GHS MOHIB BANDA NOWSHERA
266. RAFI ULLAH SST GHS ALI KHEL NORTH WAZIRISTAN
267. MANZOOR ULLAH SST GMS AHMAD KHEL NORTH WAZIRISTAN
268. MUHAMMAD ADIL SST GHS JALALA MARDAN
269. MUHAMMAD AMAN ULLAH KHAN SST GHS SOWARYAN MARDAN
270. RAEES KHAN SST GHS KHAR NO.1 DISTRICT BAJAUR
271. IBRAHIM KAMAL SST GHSS DARAKA AZIZ KHAN LAKKI MARWAT
272. MUHAMMAD JAVED KHAN SST GHS KACHKOT ASAD KHAN BANNU
273. SHAH WATAN SST GMS NIMAZKOT DIR LOWER
274. SHAUKAT ALI SST GHS MIAN BANDA DIR LOWER
275. HIDAYATUR RAHMAN SST GHS GULBANDAI BUNIR
276. SYED KAMAL SHAH SST, ADEO DEO MALE BUNER
277. RIZWAN ULLAH KHAN SST GMS ADHAMI SULTAN SHAH BANNU
278. NASIB KHAN SST GHS HAKEEM BHARAT BANNU
279. UMAR SHAH SST GHSS SKHAKOT MALAKAND
280. ALAM ZEB SST GHS SANGAO MARDAN
281. MUHAMMAD ISRAR KHAN SST GMS TOOR TANDI TSD DARRA KOHAT
282. MUHAMMAD IKRAM UDDIN SST GHS MUZHGOLE CHITRAL
283. ZARTAJ KHAN SST GHS CHEENA BUNIR
284. IJAZ AHMAD SST GHS GHAZNI KHEL LAKKI MARWAT
285. MIR BAHADAR SST GHS CHAGHAR MATTI PESHAWAR
286. AQAL MUHAMMAD SST GOVT MIDDLE SCHOOL DAMANA SWAT
287. SAEED UR RAHMAN SST GMS SHALGAH DIR LOWER
288. HAMEED ULLAH SHAH SST GHSS LANDIWAH LAKKI MARWAT
289. MASOOD KHAN SST GHS AZAM WARSAK SOUTH WAZIRISTAN
290. AZAM HUSSAIN SST GHS CHEENA RUSTAM MARDAN
291. IFTIKHAR HUSSAIN SST GHS GARHI GHULAM SHAH PESHAWAR
292. IHSAN ULLAH KHAN SST GHS TARI KHEL LAKKI MARWAT
293. MUHAMMAD SHAFIQ KHAN SST GHS MANGALA LAKKI MARWAT
294. NIAZ AHMAD SST GMS LONE CHITRAL
295. MUHAMMAD WAKEEL KHAN SST GHS NO.1 ZAIDA SWABI

296. KIFAYAT ULLAH SST GHS KOTKA NAWAB LAKKI MARWAT
297. SYED KHALID MAHMOOD SST GHS SUMANDER KATHA, ABBOTTABAD
298. AFSAR KHAN SST GHSS GADEZAI BUNIR
299. MUHAMMAD ARIF KHATTAK SST GOVT SHAHEED ZEESHAN  
HSS S.DARA KOHAT
300. ZAFAR JAVED SST GMS SAIDRA JOWER MALAKAND
301. AZIZ AHMAD SST GHSS KOTIGRAM DIR LOWER
302. ALI MAR JAN SST GHS TAP THATI KHEL LAKKI MARWAT
303. NASIM ULLAH KHAN SST GHS KOTKA HABIB ULLAH FR BANNU
304. NAJEEB ULLAH KHAN SST GHS GANDI UMAR KHAN D.I KHAN
305. MUHAMMAD SHOAIB SST G.H.S BARAWAL MATTA SWAT
306. ASAD ALAM SST GHS SHEDO NOWSHERA
307. DIL JAN SST GHS NAR M.GHAZNI KHEL LAKKI MARWAT
308. ARSHAD UR REHMAN SST GHS NAREELA ABOOTABAD
309. BAKHT NABI SHAH SST GHS GANI CHATRA SWABI
310. SYED NAVEED AHMAD SHAH SST GHS RAJWAL MANSEHRA
311. ARSHAD JAVED SST GHS MAIRA REHMAT KHAN, ABBOTTABAD.
312. IKRAM ULLAH SST GHS NO.2 BANNU
313. ABDUL KABIR SST GHS DEOLAI SWAT
314. MUHAMMAD NIAZ SST GHS SANGAR MANSEHRA
315. ZIA UR REHMAN SST GHS DAGAI BANDA NOWSHERA
316. ARSHAD ALI SST GHSS ISMAILA SWABI
317. BAKHT SUBHAN SST GHS NO.2 ALPURAI, SHANGLA
318. MIR QAD AYAZ KHAN SST GHS MANDEW BANNU
319. MUHAMMAD IMRAN SST GMS JEHNAGIR LALOZAI BANNU
320. ZAHID ULLAH KHAN SST GHSS NADAR BADIN KHEL FR BANNU
321. SULTAN MULK SST GHS BADARKANI DIR
322. GUL RAHMAN SST GHS BAJWARO TALASH DIR
323. RASOOL MUHAMMAD SST GMS AKRAM ABAD MALAKAND
324. ZIA UL HAQ SST GHS GARHI NOOR PUR, ABBOTTABAD.
325. GOHAR ALI SST, GOVT SHAHEED FAHID AHMAD HIGHER  
SECONDARY SCHOOL MALAKAND
326. GULISTAN SST GMS NO.01 DARABAN KALAN D.I KHAN
327. FATAH AHMAD SHAH SST GMS PARKUSAB CHITRAL
328. RASOOL NAWAZ KHAN SST GHS KOTI SADAT BANNU

- 329. REHMAT ULLAH SST GHSS NO.3 LAKKI MARWAT
- 330. MUHAMMAD SHAH SST GHS DARMAL BALA DIR LOWER
- 331. MUHAMMAD AZIM SST GHS SINPORA MATTA SWAT
- 332. AKHER ZAMAN SST GHS TOOTI BAGH ORAKZAI AGY
- 333. MUSHTAQ ALI SHAH SST GHS SATTI ABAD CHARSADDA
- 334. HAMAYUN RASHEED KHAN SST GHSS LASSAN THAKRAL MANSEHRA
- 335. SOHAIL AHMAD SST GHS GARA BALOCH TANK
- 336. MUHAMMAD AYAZ SST GHSS MANDANI CHARSADDA
- 337. MUHAMMAD ARIF SST GHSS DHALLAH D.I KHAN
- 338. ASADULLAH SST GMA WARIMOON CHITRAL
- 339. UMAR ALI SST GHS AZIM KILLA BANNU
- 340. ZIA UL HAQ SST GMS SULTAN KAT LADHA, SWAT
- 341. ABDUS SAMAD SST GHS ABBASS KHEL TANGI SWAT
- 342. SAJAD AHMAD SST GHS MIRAN SHAH (Dist NWTD Meranshel)
- 343. MUHAMMAD TARIQ SST GMS ALAMZAR FR BANNU
- 344. IRSHAD AHMAD SST GHSS PAKHA GHULAM PESHAWAR
- 345. NASIR KHAN SST GOVT ZEESHAN SHAHEED HIGH SCHOOL DARGAI
- 346. HANIF ULLAH SST GHS KULA DHAND CHARSADDA
- 347. ATTA ULLAH SST GHS NO.1 TORDHER SWABI
- 348. QAZI MUHAMMAD RAFIQ SST GHS NURER BANNU
- 349. BAROZ KHAN SST GHS ZANGI KHEL LAKKI MARWAT
- 350. MUHAMMAD ROSHAN SST GHS LAHORE SWABI
- 351. INAMULLAH SST GHS CHALERAI MAKEEN NORTH WAZIRISTAN
- 352. SHER ZAMAN SST GHS MANDAN BANNU
- 353. GHULAM DASTAGIR SST GHS SH. UTTAR TANK
- 354. RAZA ULLAH SST GHS BABARA CHARSADDA
- 355. INAM ULLAH KHAN SST GHS SIKANDER KHEL BALA BANNU
- 356. MURAD ALI SST GOVT. SHAHEED RIZWAN SAREER H.S.S  
UTMANZAI CHARSADDA
- 357. SHAHE ROOM SST GOVT SHAHEED SHAFIQ REHMAN HIGH  
SCHOOL GUJARAT MARDAN
- 358. WAKIL KHAN SST GHS JAGAN NATH SWABI
- 359. ZAHID NOOR SHAH SST GHS TAJ MUHAMMAD KOT  
SHIRATALA NORTH WAZIRISTAN
- 360. SHAREEFUR RAHMAN SST GHS KUJU CHITRAL

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361. MUSHARAF KHAN SST GHS KOHI SHER HAIDER BARA KHYBER AGENCY
362. NOOR AKBAR SST GHS SOOR KAMAR CHARSADDA
363. NAVEEDULLAH SST G.H.S TEHKALPAYAN PESHAWAR
364. AMEED ALAM SST GHS MADAK CHITRAL
365. SHAUKAT ALI SST GMS MUSAFAR KHAN KILLI KALOO SHAH  
LUND KHWAR MARDAN
366. ZUBAIR SHAH SST GHSS MANGA, MARDAN
367. SHAFI ULLAH SST GHS MANDAN MANJAWALA LAKKI MARWAT
368. NOMAN KHAN SST GMS ZINDIALI KHAN (Dist FR Bannu)
369. NAVEED UL AHMAD SST GHS BALACH CHITRAL
370. MASOOD UR REHMAN SST GHS SHAGAI, KHYBER AGENCY
371. ALI HAIDAR SST GMS AZIZUR REHMAN KALAY FR PESHAWAR
372. SAMI ULLAH SST GHS KOT KHADAK TANK
373. USMAN GHANI SST GMS JAN MUHAMMAD KOT NORTH WAZIRISTAN
374. ZAIN UD DIN SST GMS JAN MUHAMMAD KOT NORTH WAZIRISTAN
375. SAMI UD DIN SST GMS GOLAIN CHITRAL
376. TARIQ ULLAH SST GHS ZONDRANGRAM CHITRAL
377. ABDUL SATAR KHAN SST GHS MAYAR KHADAGZAI DIR LOWER
378. MANZOOR ULLAH SST GHS KHADDI NORTH WAZIRISTAN
379. INAYAT UR REHMAN ABBASI SST GHS NAMMAL, ABBOTTABAD
380. SAMI ULLAH KHAN SST GHSS SLEMA SIKNDERKHEL ISAKI BANNU
381. MIAN SYED WAHAB SST GHSS KHWAZA KHELA SWAT
382. MUHAMMAD RASUL SST GHSS MORILASHT CHITRAL
383. IJAZ KHAN SST GHSS COMP BANNU
384. ABDUL WAHAB SST GHS AWAN TANK
385. MAJID SHAHZAD SST GHS SHINKIARI MANSEHRA
386. HYDER ALI SST GHS KUSHUM CHITRAL
387. JAMAIR KHAN SST GHS TT SHIP HARIPUR
388. SAEED ANWAR SST GHS NO. DAGGAR BUNIR
389. ABDUR RASHEED SST GHS DARADAR MAMAZAI ORAKZAI AGENCY
390. SHAHZAD YOUSAF ABBASI SST GHS NO.02 ABBOTTABAD.
391. NOORA DAR KHAN SST GHSS LALUZAI BANNU
392. BAKHT MUNIR SST GMS LOE KHARKAI BAJAUR
393. KHALID KHAN SST GHS AFRIDO KILLI NOWSHERA



394. MUHAMMAD ARSHAD HUSSAIN SST GHSS REHMAT ULLAH  
KHAN SHABQADAR
395. MUHAMMAD ISMAIL SST GHS PRANGAI MALAKAND
396. AZIM ULLAH KHAN SST GMS GULAB KHEL MURGHALI BANNU
397. AURANG ZEB SST GHSS TAKKAR MARDAN
398. ALI ZEB SST GHS DARGAI MALAKAND (Dist Malakand)
399. INAYAT ULLAH SST GHS SHEIKH MUHAMMADI PESHAWAR
400. ALTAF QADIR SST GHS KAE NOWSHERA
401. ABDUL MAJID SST GHS KHAKI MANSEHRA
402. IKRAM KHAN SST GHSS MANPETAI SWAT
403. HABIB SAID SST GHS KATKALA BUNIR
404. ABDUL NASIR SST GHSS DHERI JULLAGRAM MALAKAND
405. HABIB US SALAM SST GHSS KISHAWRA SWAT
406. SHAUKAT ALI SST GHSS NO. 1 PAHARPUR D.I KHAN
407. FAZAL AKBAR SST BAJAUR (Dist Bajaur)
408. SHER ALI KHAN SST G.M.S DAROLI BAHRAIN SWAT
409. MUHAMMAD ASIF SST GMS SOHLAN GIRSAL D.I KHAN
410. HAROON UR RASHID SST GHS MIAN BANDA DIR LOWER
411. JAMIL AHMAD SST GCMHS CHAKISAR SHANGLA
412. MUHAMMAD SUBHAN SST GHS NUR SHUKARULLAH BANNU
413. GUL DARAZ KHAN SST GMS CHAPPER DIR UPPER
414. MUHAMMAD ABDULLAH UMAIR SIRAJI SST GCMHS NO. 1 D.I KHAN
415. SAID NAWAZ KHATTAK SST GHS GARHI USMANI KHEL MALAKAND
416. SOHAIL MUHAMMAD SST GHSS KHAR MALAKAND
417. LIAQAT HUSSAIN SST GHS BHANGIAN MANSEHRA
418. AHMAD REHMAN SST GHS SPELGAN NORTH WAZIRISTAN
419. FAZAL AMIN SST GMS BASHIGRAM SWAT
420. MUHAMMAD IMRAN SST GHS MALLANA D.I KHAN
421. SHER SHAH KHAN SST GHS TAROGAY SWAT
422. IRSHAD ALI SST GHS BEHRAM KILLI NOWSHERA
423. IRSHAD ALI SST GMS GUL MORAN KILLI KHYBER AGENCY
424. ABDUL HAYAT SST GHS NO.1 DAGI SWABI
425. HAZRAT SHAD KHAN SST GHS SHALPIN SWAT
426. MANZOOR AHMAD SST GMS NISHKOW CHITRAL

427. MUHAMMAD MUA VIA HADI SST GMS NO.3 D.I KHAN
428. MUHAMMAD ALI SHAH SST GHS F.S.MITHA KHEL BANNU
429. NAWAB ALI SST GHSS KHWAZA KHELA SWAT
430. SAKHI BAHADAR SST GHS KULYARAI BUNIR
431. MUHAMMAD ZAMAN SST GHS BOONI CHITRAL
432. IMDAD ULLAH SST GHS MIAN ESA CHARSA DDA
433. ALTAF AHMAD SST GMS CHAH LAL WALA D.I KHAN
434. HAYAT ULLAH SST GHS MUHAMMAD NAWAZ KOT MAKEEN
435. ADIL ZEB KHAN SST GHS CHANDO MAIRA, ABBOTTABAD
436. MUHAMMAD ZAMAN SST GHS CHADRAR TANK
437. SHER AFZAL SST GCMS CHITRAL
438. SABZ ALI SHAH SST GHS ZUHRAB GUL CHARSA DDA
439. MUHAMMAD FAISAL SALEEM SST GMS SHAH MAQSOOD HARIPUR
440. MUHAMMAD NAEEM SST GHS KASALA, ABBOTTABAD.
441. QABOOL MUHAMMAD SST GMS ISSORI NORTH WAZIRISTAN
442. FAYYAZ HUSSAIN SST GHS KHUTTI D.I KHAN
443. MUHAMMAD IJAZ SST GMS IRRIGATION COLONY PESHAWAR
444. RAFI ULLAH SST GHS KOTKA ABU KHAN FR BANNU
445. SHAHER YAR KHAN SST GHS AZAM WARSAK SOUTH WAZIRISTAN
446. KHAISTA RAHMAN SST GHS SHODAG CHARSA DDA
447. RAZI KHAN SST GHS GANSHAL BUNIR
448. ATIF NAWAZ SST GHSS DHODIAL MANSEHRA
449. KHURSHID ALAM SST GHS TAJORI TANK
450. ABDUL MAJEED SST GMS TANGI CHARSA DDA
451. AFSAR AHMAD SST GHS HONE CHITRAL
452. MUHAMMAD SIRAJ SST GHS RAMKOTE MANSEHRA
453. HAMEEDULLAH KHAN SST GHSS HAKIM HAVED BANNU
454. JAWAD ALI SST GHS KUTHWAL ABBOTTABAD
455. FARZAN ULLAH KHAN SST ADEO (P&D), O/O DEO (F) BANNU
456. SAMIR ULLAH SST GMS KOHI PARI NORTH WAZIRISTAN
457. IJAZ AHMAD SHAH SST GMS SH:UTTAR TANK
458. MUHAMMAD JEHANGIR KHAN SST GHS KHAZANA DHERI MARDAN
459. MUHAMMAD LATIF SST GHS NO.1 DHERI ALLADAND MALAKAND
460. RAJA MUHAMMAD SOHAIL SST GHS HUSSAINIAN MANSEHRA

- 461. REHMAT AZIZ SST GHS SUSOOM CHITRAL
- 462. NAQIB ULLAH KHAN SST GHS WANDA BARU LAKKI MARWAT
- 463. MUHSEN ULLAH SST GHSS ASHKAR KOT NORTH WAZIRISTAN
- 464. ABDUL GHAFAR SST GHS SHINGARA DIR UPPER
- 465. MUHAMMAD NASIR SST GMS TARKHA FAQIR ABAD CHARSADDA
- 466. ABDUL MALIK KHAN SST GHS PANDIALI MOHMAND AGENCY
- 467. SHAH NAWAZ SST GHS DHARYAL MANSEHRA
- 468. AMAN ULLAH SST GMS SAHIB JAN KOT NORTH WAZIRISTAN
- 469. KHUSH NAMYAR SST GHS PUSHT BAJAOUR AGENCY
- 470. MUHAMMAD ALAM SST GHSS BUTYAL SHANGLA
- 471. MUHAMMAD SALIM SST GMS SHEIKH YOUSUF D.I KHAN
- 472. SYED SAJJAD HUSSAIN SHAH SST GMS AKBARABAD  
BATKHELA MALAKAND
- 473. MUHAMMAD AURANG ZEB SST GHS SHAHZADI DIR LOWER
- 474. MUHAMMAD ZAMAN SST GHS RAGHZI KILLA NORTH WAZIRISTAN
- 475. BARKAT ALI MIAN SST GOVT HIGH SCHOOL MAINDAM SWAT
- 476. NAZIR HUSSAIN SST GHS G.BALUCH TANK
- 477. NOOR ZALI SHAH SST GHS NURER BANNU
- 478. NASRULLAH KHAN SST GHS KARI KOT, SOUTH WAZIRISTAN
- 479. MUHAMMAD AKBAR KHAN SST GHS Oghi MANSEHRA
- 480. MUNIR AHMED SST GHS NO.4 ABBOTTABAD.
- 481. SAMI ULLAH SST GHS KHIRGI SUB DIVISION JANDOLA DISTRICT TANK
- 482. SYED UL AMIN SST GHS NO.1 YAR HUSSAIN SWABI
- 483. ZIA UL HASSAN SST GHS SHIN KIARI MANSEHRA
- 484. JEHANZEB KHAN SST GHS TELA BAND PESHAWAR

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- 485. FARID UR REHMAN SST GHS GHUNDI KILLA KARAK
- 486. BADSHAH RAHMAN SST GHS SHAWA DIR LOWER
- 487. NASIR UL HAQ SST GHS BARIKOT DIR LOWER
- 488. KHAN SAID SST GMS SHODAG CHARSADDA
- 489. SHAFI ULLAH KHAN SST GHS ISAK KHEL LAKKI MARWAT
- 490. ABDUL BAQI JAN SST GMS MIRAT KHAN (Dist NWTD Mardan Swat)
- 491. SHAHID ZAMAN SST GHS SHAKARDHAND CHARSADDA
- 492. NIAZ MUHAMMAD SST GHS BEHRAM KILLI NOWSHERA
- 493. MUHAMMAD NAEEM KHAN SST GHS AKHUR WAL FR KOHAT

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494. IHSAN ULLAH SST GHS MIRAN SHAH *DIST NWTD Mervan shah*
495. ABDUR RAHIM SST GHS ASLAM ROSHNAI FR BANNU
496. HABIB SHAH SST GMS GUL JAWAR BANNU
497. WAJID MEHMOOD SST GHS NO 2 HARIPUR
498. SHAHID AHMED SST GMS HADO BANDI, MANSEHRA
499. IHSAN ULLAH SST GHS MIRAN SHAH NORTH WAZIRISTAN
500. NOOR UL HUDA SST G.H.S BAMAKHELA MATTA SWAT
501. MUKHTAR AHMAD SST GHS GULOZAI PESHAWAR
502. RAHMAT ULLAH SST GHSS GARUM CHASHMA CHITRAL
503. SYED MUDASIR SHAH SST GHS KUREZ ORAKZAI AGENCY
504. NOOR ISLAM SST GMS AZEEM KILLI, BARA, KHYBER AGENCY
505. AMIN ULLAH KHAN SST GHS TATTI PALOSA *DIST FR Bannu*
506. AFTAB ALAM SST GMS ADIN KHEL MOHMAND AGENCY
507. MUHAMMAD MUSA KHAN SST GHS SHANKAI SOUTH WAZIRISTAN
508. SYED MUNAWAR ALI SHAH SST GMS JAHAN KHANI D.I KHAN
509. SHAHZAD AWAN SST GHS MOORAT MARRA MANSEHRA
510. MUHAMMAD ASIF SST GHS KUNG KATLANG MARDAN
511. JALAL UD DIN SST GHS TAR SHISHI KOH CHITRAL
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512. NAZAR KHAN SST GHS GUL SHAH JAN KOT NORTH WAZIRISTAN
513. SAMID ULLAH KHAN SST GMS DAPPA KURRAM
514. NAVEED AHMAD SST GHS DHARYAL MANSEHRA
515. ASGHAR KHAN SST GHS GHAZLAMA NORTH WAZIRISTAN
516. SHAH NAWAZ SST GHS DHODIAL MANSEHRA
517. MUHAMMAD GUL SST GHS GUL ABAD TANGI CHARSA DDA
518. IQRAR HUSSAIN SST GMS FATEH D.I KHAN
519. SHAKEEL AHMED SST GHS M. M POL MANSEHRA
520. INAYAT ULLAH SST GMS KHAWA STORI KHEL *Dist orakzai*
521. SAMI ULLAH SST GHSS CHOUDHWAN D.I KHAN
522. MUHAMMAD NASEEM GUL SST GHS WANDA BARU LAKKI MARWAT
523. SYED SHAH FASIAL SST GHS CHUINJ CHITRAL
524. FAYAZ ALI SST GHS KHUSHUM CHITRAL
525. LAL FARAZ SST GHS GHUNDA SHAMSHAKI KARAK
526. FARMAN ULLAH SST GHS MUHAMMAD KHEL NORTH WAZIRISTAN
527. MUHAMMAD UMER KHAN SST GHS KOTLI BALA MANSEHRA

- 528. KHALID ALI SST GHSS NAWAGAI BUNIR
- 529. SHAEER MUHAMMAD SST GHSS TANGI TIMERGARA DIR LOWER
- 530. IKRAMULLAH KHAN SST GHS MAKHAI DIR LOWER
- 531. ABDUR RAHMAN SST GHS DROSH CHITRAL
- 532. TAJ GOHAR SST GHS NO 2 HARIPUR
- 533. MUHAMMAD ILYAS SST GHSS MORIL LASHT CHITRAL
- 534. ZAHOOOR AHMAD SST GHS DODHER SWABI
- 535. IRFAN BASHIR SST GHSS GARYALA MARDAN
- 536. TAJDAR ADIL SST GHS JABA MANSEHRA
- 537. KHURSHID HUSSAIN SST GHS CHADRAR TANK
- 538. MALIK ANSAR KHAN SST GMS KAYIAN MANSEHRA
- 539. IFTIKHAR AHMED SST GHS PALALA MANSEHRA
- 540. IMTIAZ UL HAQ SST GMS SHAWA BANDA KATLANG MARDAN
- 541. MUHAMMAD HASSAN SST GHS ZALAM KOT MALAKAND
- 542. JAVED HUSSAIN SST GHS SHER PALAM SWAT
- 543. FALAK NAZIR SST GHS PAINDA KHEL BANNU
- 544. SAIF UD DIN SST GHSS MORI LASHT CHITRAL
- 545. MUHAMMAD AJMAL KHAN SST GHS TAKIA SHEIKHAN, ABBOTTABAD
- 546. ABDUL MAJEED SST GHS GARA ESSA KHAN D.I KHAN
- 547. WISAL KHAN SST GMS SHAHAB KHEL PESHAWAR
- 548. MUHAMMAD YOUNAS KHAN SST GHSS SKHAKOT MALAKAND
- 549. MUHAMMAD FAZAL KABIR SST GHS SWEER CHITRAL
- 550. SYED MUNIR SHAH SST GHS ISTARU CHITRAL
- 551. ISHAQ AHMAD SST GHS AYUN CHITRAL
- 552. SARWAR HUSSAIN SST GHS BIRGA NISAR CHITRAL
- 553. MUHAMMAD NOOR DIN SST GMS MUBARAK SHAHI
- 554. MUHAMMAD ZUBAIR SST GOVT: ZEESHAN SHAHEED SCHOOL  
DARGAI-MALAKAND.

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- 555. MUHAMMAD ISMAIL SST GHS GARHI USMANI KHEL MALAKAND
- 556. ZIA UL ISLAM SST GHS AYUN CHITRAL
- 557. NASIB RAAWAN SST GHSS TOPAI BUNER
- 558. AMJAD ALI SST GHS TANO SWABI
- 559. ABDUL JALIL KHAN SST GMS ADMI SULTAN SHAH BANNU
- 560. QAYYUM NAWAZ SST GMS KALA GORH D.I KHAN
- 561. SHER BAHADAR SST GMS TORWAL SWAT

- 562. MUHAMMAD ISRAR KHAN SST GHS NO.1 SAKHAKOT MALAKAND
- 563. FAZAL KARIM SST GHS KHARGI FR TANK
- 564. MUHAMMAD BADER MUNIR SST GHSS LORA, ABBOTTABAD
- 565. IMTIAZ UR RAHMAN SST GHS SONOGHAR CHITRAL
- 566. AHMAD MUSTAFA KAMAL SST GHS KHOT CHITRAL
- 567. TAJ MUHAMMAD KHAN SST GHS KOGHUZI CHITRAL
- 568. SAJID MEHMOOD SST GHS DHEENDHA HARIPUR
- 569. JALALUD DIN SST GHS KARI CHITRAL
- 570. KHALID AZIZ KHAN SST GHS KOTI SADAT BANNU
- 571. FAZAL RASHID SST GHS KASS SHINGRAI SWAT
- 572. AURANG ZEB KHAN SST GHS MUHAMMAD KHEL BANNU
- 573. HABIB-UR-RAHMAN SST GHS SWEEGALAI SWAT
- 574. ABDUR RASHID SST GCMHS MUSLIM ABAD KOHAT
- 575. QAZI YASIR AHMED SST GHSS NO.1 MANSEHRA
- 576. INAMULLAH SST GHS PAROA D.I KHAN
- 577. NOOR MUHAMMAD SST GHS BAGATO HANGU
- 578. RAHMAT DIN SST GHS CENTERAL JAIL HARIPUR
- 579. JAVED SST GHS FATEHPUR SWAT
- 580. MUHAMMAD LATIF SST GMS LAHORE SHANGLA
- 581. NAZAR ABBAS SST GMS THATHA BALOCHAN TANK
- 582. AKBAR ALI SST GHSS SHAHPUR SHANGLA
- 583. MUQADAR SAID SST GHS PATO TALASH DIR LOWER
- 584. SYED GOHAR ALI SHAH SST GHSS UTLA SWABI
- 585. ANWAR SALIM SST GHS WANDA AMIR LAKKI MARWAT
- 586. MUHAMMAD TAHIR SST GHSS DOBIAN SWABI
- 587. NOOR UL HASSAN SHAH SST GHS MUSAZAI SHARIF D.I KHAN
- 588. MUHAMMAD SIBTAIN SST GHS MALLANA D.I KHAN
- 589. LIAQAT ZAMAN SST GHS TOPI SWABI
- 590. KHATIB AHMAD KHAN SST GHS TURAN NAU TANK
- 591. AHMAD REHMAN SST GHS DANDI WAZIR KARAK
- 592. HAMID ALI SST GMS SHAH DAND LUND KHWAR MARDAN
- 593. SYED QAIS IQBAL SHAH SST GHS G.SHAHBAZ TANK
- 594. BAKHT ZADA SST GHS BANDAGAI BAJAUR
- 595. IFTIKHAR AHMAD SST GHS KHUNGI DIR LOWER

- (19)
596. MUHAMMAD IDREES SST GHS HAJIABAD Dist Dir Lower  
597. MUHAMMAD AMJAD AKBAR SST GHSS SHOR KOT D.I KHAN  
598. SHEIKH ABDUS SATTAR SST GHSS NO. 1 PAHARPUR D.I KHAN  
599. IJAZ AHMAD SST GHS BALACH CHITRAL  
600. NASIR MUNIR SST GMS GULI BAGH MANSEHRA  
601. MUHAMMAD ZAMAN SST GHS HISSAM D.I KHAN  
602. MUHAMMAD RAEES SST GHS BEHARI COLONY D.I KHAN  
603. MUHAMMAD PARVEZ SST GHS KHIRGI DISTRICT TANK  
604. ATIQ UR REHMAN SST GMS KAUSAR FATAH KHEL, BANNU  
605. AMIN ULLAH SHAH SST GMS JANDHO KHEL BANNU  
606. MAJEED ULLAH SST GHS PURAN SHANGLA  
607. MUHAMMAD ALAM SST GHSS BUTYAL SHANGLA  
608. ATTA ULLAH SST GMS SANGRAI SHANGLA  
609. BAKHT SUBHAN SST GHS NO.2 ALPURAI SHANGLA

#### **Respondents**

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**SERVICE APPEAL:** Under section 4 of service tribunal Act, 1974, for declaration to effect that seniority list of SST updated on 31-12-2022 issued by Respondent No 2, whereby SST initially appointed on Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 (respondent No 4 to respondent No 626) under KPK (regularization of service) Act 2009 have been given seniority over the appellant who was appointed on the recommendation of KPK Public Service Commission is against the law and fact, discriminatory, void ab-intio, arbitrary,

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malafide, illegal against section 4 of KPK (regularization of service) Act 2009 and against the Judgment of Supreme Court of Pakistan Dated 02-06- 2022, Hence in effective upon the rights of the appellant. That the first batch of the SST consisting of 10 candidates were recommended by the KPK (Public Service Commission) on 24-08-2009 (annexed as annexure "A") which is prior to the commencement of KPK (regularization of service) Act 2009 promulgated on 24-08-2009, Hence the appellant ranks senior in service over the employees initially appointed on Adhoc Basis & later on regularized in service (respondent No 4 to respondent No 626).

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**PRAYER:** On acceptance of instant service appeal, the Honorable court may graciously be pleased to pass the order as under:

- a. Declaration to the effect the impugned seniority list of SST updated with on 31-12-2022 issued by respondent No 2 whereby SST initially appointed on Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 (respondent No 4 to respondent No 626) under KPK (regularization of service) Ac 2009 have been given seniority over the appellant who was appointed on the recommendation of KPK Public Service Commission is wrong, incorrect, against law and facts, discriminatory, void ab-intio, misuse of authority, malafide, Illegal, against



section 4 of KPK (Regularization of service) Act 2009 and against the Judgment of Honorable Supreme Court of Pakistan Dated 02-06-2022, hence in effective upon the rights of appellant. The promotion of SST (Secondary School teacher) made by respondent No 2 on the basis of impugned seniority list is also against the law and facts. The already promoted SST on basis of impugned seniority list should be considered and placed junior to appellant.

- b. That, the Appellant who is appointed on the basis of recommendation of the Khyber Pakhtunkhawa public service commission may graciously be declared senior over the SST who were initially appointed on Adhoc basis and were later on regularized on 24-10-2009 under KPK (regularization of service ) Act 2009 (respondent No 4 to respondent No 626).
- c. Direction to the respondents to prepare a fresh seniority list in accordance with section 4 of KPK (regularization of service) Act 2009 and Judgment dated 02-06-2022 issued by Honorable of Supreme Court of Pakistan.
- d. Direction to respondents to consider and place the appellant as senior to already promoted SST (initially appointed on adhoc basis) on the basis impugned seniority list (respondent No 4 to respondent No 626).
- e. Any other relief which Honorable court deem fit and proper may graciously be granted to the appellant in the highest interest of justice.

**Respectfully Sheweth**

- 1. That, the appellant had applied for the post of SST in the light of advertisement No-01-2009. That the first

batch of the SST was recommended by Khyber Pakhtunkhawa public service commission on 24-08-2009 before the commencement of KPK (Regularization of service) Act 2009 through proper recruitment process. **(Copy of Advertisement of KPPSC & copy of recommendation of the commission dated 24-08-2009 are annexed as annexure "A & B")**

2 That, similarly SST (respondent No 4 to respondent No 626) were initially appointed on the Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 under KPK (regularization of service ) Act 2009. **(copy of KPK (Regularization of service) Act 2009 is annexed as annexure "C")**

3 That respondent No 2 issued seniority list of SST updated on 31-12-2022 , whereby respondent No 4 to respondent No 626 who are initially appointed on Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 under KPK (regularization of service) Act 2009 were given seniority over the appellant **(Copy of seniority list of SST as annexed is annexure "D")**.

4 That, above mentioned seniority list was issued by respondent No 2 is in violation of section 4 of the KPK (regularization of the service)Act 2009 and the Judgment of Supreme Court of Pakistan Dated 02-06- 2022, Hence appellant filed departmental appeal before the respondent No 2 **(copy of departmental Appeal is annexed as annexure "E")**

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5 That, the respondent No 2 had not decided the departmental appeal filed by the appellant within the stipulated period of 90 days.

6 That feeling aggrieved from seniority list of SST issued by respondent No 2 and not deciding the departmental appeal within stipulated period of 90 days, the appellant files instant service appeal inter alia on amongst other grounds.

### **GROUND:**

A. That, the seniority list of SST updated on 31-12-2022 issued by respondent No 2, whereby SST initially appointed on adhoc basis in the year 2006,2007,2008 and were later on regularized on 24-10-2009 under KPK(regularization of service ) Act 2009, (respondent No 4 to respondent No 626) have been given seniority over the appellant who was appointed on the recommendation of KPK Public Service Commission is against the law and fact, discriminatory, void ab-initio, arbitrary, malafide, illegal, against section 4 of the KPK (regularization of service ) Act 2009 and against the Judgment of Supreme Court of Pakistan Dated 02-06-2022. (copy of judgment Dated 02-06-2022 is annexed as annexure "F")

B. That the Act of the respondent No. 2 in not deciding the departmental appeal within statutory period of 90 days is also against law and fact discriminatory, Arbitrary, malafide and

misuse of authority.

- c. That according to section 4(1) of KPK (regularization of service) Act 2009 regarding determination of the seniority, it is laid down that **“The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment”.**
- d. That the Act of respondents is in sheer violation of Judgment of Supreme Court of Pakistan dated 02-06-2022 already passed in the similar matter.
- e. That, the first batch of SST were recommended by KPK (Public Service Commission) on 24-08-2009 before the commencement of KPK (regularization of service) Act 2009 which was promulgated on 24-10-2009. The August Supreme Court of Pakistan in its judgment dated 02-06-2002 held that **“Admittedly, the recommendation of the first batch amongst the appellants were made by the KPPSC to the competent authority on 15-09-2009, whereas the Act was promulgated on 24-10-**

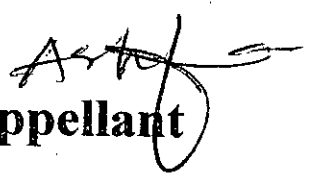
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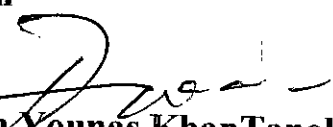
2009, therefore, the recommendations of all the appellants shall be deemed to have been made by the competent authority prior to the commencement of the Act, irrespective of the subsequent recommendations and dates of their appointments. Hence, the services of those employees, which were regularized pursuant to the Act, shall rank junior to those candidates, whose recommendations were made by the KPPSC, prior to the commencement of the Act. The department while constructing the seniority list was right in placing the appellants senior to those who were regularized pursuant to the Act. The list has wrongly been reversed by the Tribunal, which amounts to misinterpretation of the relevant provisions of law, which is an illegality, on the basis whereof, the judgment impugned is not sustainable”.

- F. That, Appellant who was appointed on the basis of recommendation of the KPK public service ranks senior in Service over the employees initially appointed on Adhoc basis and were later on regularized in service (respondent No 4 to respondent No 626).
- G. That, Act of respondents amounts to colorful exercise of power and misuse of authority which is not tenable in the eyes of law.
- H. That, respondents have committed discrimination with appellant, which is sheer violation of Article 4 and 25 of the constitution of the Islamic republic of Pakistan 1973.

- i. That, matter of appellant is concerning terms and conditions of service under Article 212 of constitution of Islamic Republic of Pakistan 1973 hence, appellants have no other proper forum except this Honorable service Tribunal.
- j. That, instant appeal is well in time.
- k. That, the other points shall be agitated at the time of argument with prior permission of the Honorable Tribunal.

It is therefore prayed that instant appeal may graciously be accepted as prayed for in the heading the instant appeal.

  
**Appellant**

**Through**  
  
**Imran Younas Khan Tanoli**  
**Advocate High Court Peshawar**  
**Abbottabad**

**Dated:** 31-7-2023

(27)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA**  
**PESHAWAR**

Service Appeal No \_\_\_\_\_

Ashfaq Ahmed SST (G), GHS Beran Gali, Abbottabad.

**Appellant**

***VERSUS***

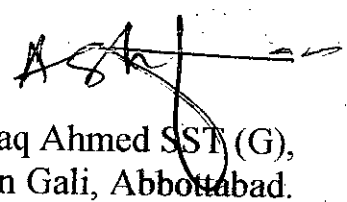
Secretary Elementary & Secondary Education KPK Peshawar & others.

**Respondents**


**SERVICE APPEAL**

**AFFIDAVITS**

Appellant solemnly affirms and declares on oath that contents of foregoing Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from the Honourable Tribunal.

  
Ashfaq Ahmed SST (G),  
GHS Beran Gali, Abbottabad.

**THROUGH**

  
Imran Younas Khan Tanoli  
Advocate High Court Peshawar  
Abbottabad

Dated 31-7-2023

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_

Ashfaq Ahmed SST (G), GHS Beran Gali, Abbottabad.

**Appellant**

**VERSUS**

Secretary Elementary & Secondary Education KPK Peshawar & others.

**SERVICE APPEAL**

**INTERIM RELIEF**

Applicant for interim relief to effect that the operation of impugned seniority list issued by Respondent No 2 may graciously be suspended and the respondents be restrained from making any promotion or passing any order which is against right and interest of appellant till the decision of the instant appeal.

**Respectfully Sheweth**

- 1 That instant appeal is being filed today. Instant application may be consider as integral part of instant appeal.
- 2 That the appellant has a prima facie excellent case and he is hopeful of his success.
- 3 That in case the impugned seniority list is not suspended, appellant will be suffer irreparable loss.
- 4 That balance of convenience lies in favour of the appellant.

It is therefore prayer that on acceptance of instant application, the impugned seniority list issued by Respondent No. 2 may graciously be suspended and respondents may be restrained from making any promotion or passing any order which is against the right of appellant till decision of instant appeal.

*Ashfaq*  
**Appellant**

Through *Imran*  
**Imran Younas Khan Tanoli**  
**Advocate High court Peshawar**  
**Abbottabad.**

Dated ~~14-04-2023~~  
31-7-2023



**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHAWA**  
**PESHAWAR.**

Service Appeal No \_\_\_\_\_

Ashfaq Ahmed SST (G), GHS Beran Gali, Abbottabad.

**Appellant**

**VERSUS**

Secretary Elementary & Secondary Education KPK Peshawar & others.

**SERVICE APPEAL**

**Interim**

**Relief**

**Affidavit**

Verified on oath that the contents of foregoing application for interim relief is true and correct to my best knowledge and belief and nothing has been suppressed from this Honorable tribunal.

Ashfaq Ahmed SST (G),  
GHS Beran Gali, Abbottabad.

**Through**

Dated



31-7-2023

**Imran Younas Tanoli**  
Advocate High court Peshawar  
Abbottabad.

**NWFP PUBLIC SERVICE COMMISSION****2- Fort Road Peshawar Cantt:****Website: [www.nwfppsc.gov.pk](http://www.nwfppsc.gov.pk)**Dated: 26-01-2009**ADVERTISEMENT No. 01 / 2009.**

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). **Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.**

**AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:**

**(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:**

**QUALIFICATION:** M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

**ALLOCATION:** Merit.

**(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:**

**QUALIFICATION:** M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

**AGE LIMIT:** 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1
01	01

**CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.**

**(S.No. 03) Five (05) Posts of Data Entry Operators.**

**QUALIFICATION:** (i) 2<sup>nd</sup> Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry verification.

**AGE LIMIT:** 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes.

**ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

Merit	Zone-2
01	01

(S.No. 44) **Twenty one (21) Posts of Female Head Mistress. (with out graduaty and pension).**

**QUALIFICATION:** (a) Master Degree with B.Ed/M.Ed/M.A /M.A (Education) from a recognized University with Five years experience. (NOTE) experience shall be counted from M.A/M.Sc or M.Ed which ever is proper.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
05	04	04	03	02	03

(S.No. 45) **One (01) Post of Head Mistress. For Earth Quake Quota (I.E). (with out graduaty and pension).**

**QUALIFICATION:** (a) Master Degree with B.Ed/M.Ed/M.A /M.A (Education) from a recognized University with Five years experience. (NOTE) experience shall be counted from M.A/M.Sc or M.Ed which ever is proper.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

**ALLOCATION:** District Battagram.

(S.No. 46) **Four Hundred and Forty Nine (449) Posts of Male S.S in Various Subjects .(with out graduaty and pension).**

**QUALIFICATION:** Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Male.

**ALLOCATION:**

Subject:	No. of Posts	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
Islamiyat	58	14	09	10	10	08	07
History-Cum-Civic	52	13	08	08	09	07	07
English	48	12	08	08	08	06	06
Chemistry	44	11	07	07	07	06	06

Islamiyat	58	14	09	10	10	08	07
History-Cum-Civics	52	13	08	08	09	07	07
English	48	12	08	08	08	06	06
Chemistry	44	11	07	07	07	06	06
Economics	41	10	07	07	07	05	05
Maths	41	11	06	07	07	05	05
Statistics	40	10	06	07	07	05	05
Physics	38	10	07	07	06	04	04
Pak-Study	37	09	06	06	06	05	05
Biology	36	09	06	06	06	05	04
Urdu	14	03	02	02	02	02	03

**(S.No. 47) Nine (09) Posts of Male S.S Disabled (with out graduaty and pension).**

**QUALIFICATION:** Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which his services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years. **PA' SCALE:** BPS-17 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit Quota.

S.No	Subject	No. of Posts	Allocation
01	Islamiyat	01	Merit Quota
02	History-cum-Civics	01	Merit Quota
03	Economics	01	Merit Quota
04	English	01	Merit Quota
05	Statistics	01	Merit Quota
06	Maths	01	Merit Quota
07	Biology	01	Merit Quota
08	Chemistry	01	Merit Quota
09	Physics	01	Merit Quota

**(S.No. 48) Twenty Four (24) Posts of Male S.S (Earth Quake Quota) For Districs Battagram, Mansehra, Slangla, Kohistan, Abbottabad, with out graduaty and pension).**

**QUALIFICATION:** Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years. **PA' SCALE:** BPS-17 **ELIGIBILITY:** Male

**ALLOCATION:**

S.No	Subject	No. of Posts	Allocation
1.	Islamiyat	03	Merit Quota
2.	Pak: Study	02	Merit Quota
3.	History-Cum-Civics	03	Merit Quota
4.	Economics	02	Merit Quota
5.	English	02	Merit Quota
6.	Statistics	02	Merit Quota
7.	Maths	02	Merit Quota
8.	Biology	02	Merit Quota
9.	Chemistry	02	Merit Quota
10.	Physics	02	Merit Quota
11.	Urdu	02	Merit Quota

**(S.No. 49) Three Hundred and Ninty One (391) Posts of Female S.S in Various Subjects (with out graduaty and pension).**

**QUALIFICATION:** Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other

provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female

**ALLOCATION:**

Subject:	No. of Posts	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
Statistics	50	13	08	09	08	06	06
Pak-Study	48	12	08	08	08	06	06
Islamiyat	44	09	08	08	07	06	06
Economics	44	11	08	07	07	05	06
Maths	43	11	07	07	06	06	06
English	35	09	06	05	05	05	05
Physics	35	09	06	05	05	05	05
Chemistry	31	08	05	05	05	04	04
Biology	29	07	05	05	05	04	03
History-Cum-Civic	27	07	04	05	05	03	03
Home Economics	05	02	01	01	01		

**(S.No. 50) Four (04) Posts of Female S.S. Disable (with out graduate and pension):**

**QUALIFICATION:** Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (Industrial Arts or Business Education) from a recognized University.

**NOTE:** If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc. as specified above within three years from the date of appointment, failing which his services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female

**ALLOCATION:**

S.No	Subject	No. of Posts	Allocation
1.	Islamiyat	01	Merit Quota
2.	Pak: Study	01	Merit Quota

qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which his services shall be terminated irrespective of any other provisions of the rules for the time being in force.

**NOTE:** For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

**For Biology:** 2<sup>nd</sup> Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

**ALLOCATION:**

S.No	Subject	No. of Posts	Allocation
5.	Islamiyat	02	Merit Quota
6.	Pak: Study	03	Merit Quota
7.	History-Cum-Civics	02	Merit Quota
8.	Economics	02	Merit Quota
9.	English	02	Merit Quota
10.	Statistics	02	Merit Quota
11.	Maths	02	Merit Quota
12.	Biology	02	Merit Quota
13.	Chemistry	02	Merit Quota
14.	Physics	02	Merit Quota

**(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) with out graduaty and pension).**

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

**For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.**

**AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

**(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out gradiaty and pension).**

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

**For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.**

Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.  
**AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

**(S.No. 53)** **Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension):**

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

**(S.No. 54)** **Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad (Both Science & Arts) (with out graduaty and pension).**

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

**(S.No. 55)** **Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	62	162	122	122

**(S.No. 56)** **Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out**



graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. years (10 years age relaxation)

**PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

**ALLOCATION:** Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

**QUALIFICATION:** For Secondary School Teacher (General) (i) B.A. Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female

**ALLOCATION:** Merit.

**TECHNICAL EDUCATION AND MAN POWER TRAINING**  
**DEPARTMENT.**

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

**QUALIFICATION:** (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College as Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

**QUALIFICATION:** (a) Ph. I in Engineering from a recognized University / Institute with one years's teaching professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such OR (c)

Bachelor's Degree in Engineering/ Associate Member Institute of Engineering in the relevant subject from a recognized University / Institution with Seven years teaching/ professional experience in the relevant subject as such.

**AGE LIMIT:** 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.  
**ALLOCATION:** Merit.

(S.No. 60)

**Twenty Two (22) Posts of Male Instructor/Lecturer in Commerce for Govt: College of Commerce/ Govt: Commercial training Institute.**

**QUALIFICATION:** 2<sup>nd</sup> Class Master Degree in the relevant subject or equivalent qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
05	04	04	04	03	02

(S.No. 61)

**Three (03) Posts of Male Instructor/Lecturer in Commerce for Earthquake Affected Areas for Govt: College of Commerce/ Govt: Commercial training Institute.**

**QUALIFICATION:** 2<sup>nd</sup> Class Master Degree in the relevant subject or equivalent qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:** Merit. (District Wise Distribution)

Battagram	Shangla	Kohistan
01	01	01

(S.No. 62)

**Fourteen (14) Posts of Male Instructor/ Lecturer of computer Science for Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

**QUALIFICATION:** (i) 2<sup>nd</sup> Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:**

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
04	02	02	02	02	02

(S.No. 63)

**One (01) Post of Male Instructor/ Lecturer of computer Science (Disable) for Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).**

**QUALIFICATION:** (i) 2<sup>nd</sup> Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.

**AGE LIMIT:** 21 to 40 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

**ALLOCATION:** Merit.

(S.No. 64)	<p><b>One (01) Post of Female Instructor Commerce. In GCC/GCTIs.</b>  <b>QUALIFICATION:</b> 2<sup>nd</sup> Class Master's Degree in the relevant Subjects or equivalent qualification from a recognized University.  <b>AGE LIMIT:</b> 21 to 40 years. <b>PAY SCALE:</b> BPS-17. <b>ELIGIBILITY:</b> Female.  <b>ALLOCATION:</b> Zone-5</p>										
(S.No. 65)	<p><b>One (01) Post of Male Instructor/ Lecturer of computer Science Earth quack Affected Area in Government College of Commerce (GCC)/ Govt: Commercial Training Institute (GCTI).</b>  <b>QUALIFICATION:</b> (i) 2<sup>nd</sup> Class Master's Degree in the relevant subject or equivalent qualification from a recognized University.  <b>AGE LIMIT:</b> 21 to 40 years. <b>PAY SCALE:</b> BPS-17. <b>ELIGIBILITY:</b> Male.  <b>ALLOCATION:</b> Merit.</p>										
(S.No. 66)	<p><b>Ten (10) Posts of Male office Assistant.</b>  <b>QUALIFICATION:</b> Bachelor degree from recognized University.  <b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14. <b>ELIGIBILITY:</b> Male.  <b>ALLOCATION:</b></p> <table border="1" data-bbox="321 1071 1466 1171"> <thead> <tr> <th>Zone-1</th> <th>Zone-2</th> <th>Zone-3</th> <th>Zone-4</th> <th>Zone-5</th> </tr> </thead> <tbody> <tr> <td>02</td> <td>02</td> <td>02</td> <td>02</td> <td>02</td> </tr> </tbody> </table>	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	02	02	02	02	02
Zone-1	Zone-2	Zone-3	Zone-4	Zone-5							
02	02	02	02	02							
(S.No. 67)	<p><b>One (01) Post of Female office Assistant.</b>  <b>QUALIFICATION:</b> Bachelor degree from recognized University.  <b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14. <b>ELIGIBILITY:</b> Female.  <b>ALLOCATION:</b> Merit.</p>										

### CORRIGENDUM

1. The Post of Research Officer for Earth Quake Quota appearing at S. No. 2 Advt. No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

### GENERAL CONDITIONS

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward Areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.
- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.

Interview Result of 10 Posts of Female S E T (Earth Quake Quota) (B-15) (Science Group)  
School Literacy Department advertisement No. 1/2009 S No 57

Interviews for the posts were held w e t 10/07/09 to 31/07/09. As a result the following  
candidates to be recommended to the Government for appointment for the subject cited posts.  
Subject to fill the deficiencies wherever required

S NO  
Name with Father's Name  
District/ Zone

FUZA KHUSHAL D/O NIJSHAL KHAN  
ABBOTTABAD/5

ASIYA BIBI D/O SYED GULZAR SHAH  
UDA MANSEHRA/3

MISS NABILA NAWAZ D/O MUHAMMAD NAWAZ  
MANSEHRA/5

FARHAT JABEEN D/O ABDUL KHALIQ AWAN  
ABBOTTABAD/5

NIGHAT BIBI D/O MUHAMMAD KHAN  
MANSEHRA/5

ASMA GHAFAR D/O ABDUL GHAFAR KHAN  
ABBOTTABAD/5

ZAINEB BUKHARI D/O SYED INAYATULLAH SHAH  
MANSEHRA/5

SAIMA BIBI D/O MUHAMMAD ASHRAF  
MANSEHRA/5

SAIMA NOREEN D/O CHAN MUHAMMAD  
ABBOTTABAD/5

IRRUM MANZOOR D/O MANZOOR AHMED  
MANSEHRA/5

To: Saima Niswan P/o  
Sgt & P/o Sherwan Khurd,  
Abbottabad

Public  
Commission  
Dated

Subject: - RECRUITMENT OF Female Set (20)

The Commission has recommended you to the Government for appointment. please do not treat this as a letter of appointment for which Government authority. The Commission cannot entertain any correspondence from you in this regard.

Annexure & Annexure C  
41

THE <sup>1</sup>[KHYBER PAKHTUNKHWA]  
EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009  
(<sup>2</sup>[KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009)

[First published after having received the assent of the Governor of the <sup>3</sup>[Khyber Pakhtunkhwa] in the Gazette of <sup>4</sup>[Khyber Pakhtunkhwa] (Extraordinary), dated the 24<sup>th</sup> October, 2009]

24-10-2009

AN  
ACT

to provide for the regularization of the services of certain employees appointed on adhoc or contract basis.

**WHEREAS** it is expedient to provide for the regularization of the services of certain employees appointed on adhoc or contract basis, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:-

1. **Short title and commencement.**—(1) This Act may be called the <sup>5</sup>[Khyber Pakhtunkhwa] Employees (Regularization of Services) Act, 2009.

(2) It shall come into force at once.

2. **Definitions.**—(1) In this Act, unless the context otherwise requires,-

(a) "Commission" means the <sup>6</sup>[Khyber Pakhtunkhwa] Public Service Commission;

(aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment;

(b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge basis or who are paid out of contingencies;

<sup>1</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>2</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>3</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>4</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>5</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

<sup>6</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

- (c) "Government" means the Government of the <sup>1</sup>[Khyber Pakhtunkhwa];
- (d) "Government Department" means any department constituted under rule 3 of the <sup>2</sup>[Khyber Pakhtunkhwa] Government Rules of Business, 1985, and does not include any section of a Department or an organization which is federally funded;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants; and
- (f) "post" means a post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commission.

(2) The expressions "ad hoc or contract appointment" and "civil servant" shall have the same meanings as respectively assigned to them in the <sup>3</sup>[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (<sup>4</sup>[Khyber Pakhtunkhwa] Act No. XVIII of 1973).

**3. Regularization of services of certain employees.**---All employees including recommendees of the High Court appointed on contract or ad hoc basis and holding that post on 31<sup>st</sup> December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

**4. Determination of seniority.**---(1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

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

<sup>1</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011  
<sup>2</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011  
<sup>3</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011  
<sup>4</sup>Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011



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Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

4A. **Overriding effect.**---Notwithstanding any thing to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provision of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

5. **Repeal.**---The North-West Frontier Province Employees (Regularization of Services) Ordinance, 2009 (N.-W.F.P Ordinance No. VII of 2009) is hereby repealed.

FINAL SENIORITY LIST OF (2022) SST (G), SST (B/C), SST (P/M) & SST (TECH & COMMERCE) OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA AS STOOD ON 31/12/2021

Seniority list of SST.  
Annexure D  
46


S.No	CNIC No	Name of Official	Father Name	Domicile	Date of Birth	Qualification	Prof Qualif:	Subject(s) in Master With Division	Year of B.Ed	Date of Ist: Apptt:in Edu Deptt:	D/o Apptt / Promotion to SST Post	Date of Regular: Notification	Merit Score	Advertisement No & Date	Method of Recruitment	School/Office
		Hidayat Ullah Khan		Karak	03/03/1966	MA	B.Ed		1993	07/04/1988	29/04/1993					GHSS Dabil Lawghar
2	17301-1484110-9	MASAL KHAN	MUHAMMAD AKBER	Peshawar	12/04/1962	MA	B.Ed	Economics	1993	29/05/1988	29/04/1993					GHS DEH BAHADER PESHAWAR
3		Abdul Hamid		Mansehra	09/12/1963	BA	B.Ed		1987	23/05/1995	23/05/1995					GHS Data Manshra
4	16101-1846980-9	ILTAF HUSSAIN	IMRAN ULLAH	MARDAN	16/08/1967	MA	B.Ed	Islamiyat, Pashto	1995	04/12/1990	24/05/1995					GHS AC CENTRE NOWSHERA
5		MUHAMMAD ZAMAN		Mohmand Agency	23/05/1963	BA	B.Ed		1991	17/09/1989	25/03/1996					GHS GHARIB ABAD PESHAWAR
6	13302-0342007-3	MUHAMMAD IQBAL	REHMAT DIN	HARIPUR	05/06/1965	BA	M.Ed	History Cum Pak Study	1993	16/11/1994	25/03/1996					GHS KALAG HARIPUR
7	13101-6631112-1	MUHAMMAD NASRULLAH SIDDIQUE	SAHIB UD DOLA	Abbottabad	27/04/1963	M.Sc	M.Ed	Chemistry	1993	07/11/1995	25/03/1996					GCMHS No 2 Abbottabad
8	13101-1671697-9	ZAKRIA	ABDUL MAJEED	Abbottabad	03/04/1965	M.A	B.Ed		1994	14/07/1994	10/11/1994					GHS BAGAN AA BAD
9	21103-0395531-1	MUHAMMAD SHAH	MUHAMMAD SHOAB	Bajaur	05/01/1966	MA	B.Ed	Islamiyat	1992	15/03/1993	28/03/1996					GHS KHAR
10		MUHAMMAD ALI		Swat	15/04/1971	MA	M.Ed		1992	28/03/1996	28/03/1996					GMS LEGANAI BUNIR
11	16202-0641804-5	HAMEED ULLAH	MUHAMMAD TAHIR	Swabi	17/04/1969	MA	B.Ed	Islamiyat	1993	19/12/1989	25/03/1996					GHS Nathia Gali, Abbottabad
12		HABIB ULLAH		FATA	05/04/1963	MA	B.Ed		1997	11/03/1998	15/01/1998					GHS Subhat Gish EB IANK
13		FAZAL UR REHMAN		Peshawar	05/02/1965	M.Sc	M.Ed		1997	05/01/1998	15/01/1998					GHS ADEZAI PESHAWAR
14	21702-2339942-1	MASSUD UR REHMAN	NOOR ULLAH JAN	South Waziristan	06/06/1972	MA	B.Ed	Pashto	1997	15/01/1998	15/01/1998					GHS SWA
15	12101-0947720-7	SHAHID NAWAZ	M. BAKHSH	D.I.Khan	17/08/1969	M.Sc	B.Ed	Computer Science	1997	15/01/1998	15/01/1998					GHS KIRI SHAHMOZI D.I KHAN
16		MR. NAEEMUD DIN MIAN		Peshawar	19/03/1963	B.A SST	B.Ed		1995	15/01/1998	15/01/1998					GHS MUSAZAI PESHAWAR
17	13302-0436046-9	Masood ur Rehman	Sadiq Zaman	Haripur	25/12/1965	MA	M.Ed	Urdu	1993	16/04/1984	15/01/1998					GHSS Sec No.4 KTS
18		WISAL KHAN		Swabi	01/04/1968	M.Sc	B.Ed	Maths	1994	15/01/1998	15/01/1998					GHS NO 2 TORDHER SWABI
19	16201-0698942-9	AFSAR KHAN	ABDUL JALIL	Swabi	05/02/1964	BA	B.Ed		1994	21/01/1985	15/01/1996					GHS SHADAD KILLI SWABI
20		JEHAN ALI	LUTF UR REHMAN	Swabi	12/02/1968	BA	M.Ed		1994	17/12/1990	15/01/1998					GHS KALU KHAN SWABI
21	21702-2345516-9	MUHAMMAD ABDULLAH KHAN	AMAN ULLAH JAN	South Waziristan	04/07/1965	BA	B.Ed		1995	10/09/1989	15/01/1998					GHS South Waziristan Agency
22		Amir Jan		Swat	07/12/1964	MA	M.Ed	Political Science	1994	13/12/1988	15/01/1998					GHS Shagai Swat
23	13202-0723342-1	MUHAMMAD AFZAL	MUHAMMAD AYUB	Baltagram	02/04/1964	B.Sc	B.Ed		1998	22/11/1986	16/04/1998					GHS BATAGRAM
24	17101-0413117-1	AMJID ALI	RIAZ UD DIN	Charsadda	05/06/1963	M.Sc	B.Ed	Horticulture	1998	07/02/1988	31/07/1998					GHSS TARNAB, CHARSADDA
25	16102-9224540-1	AMJAD ALI	Diyar Khan	Mardan	24/03/1965	BA	B.Ed		1991	01/11/1987	12/07/1999					GMS HUSAI UMAR ABAD

S.No	CNIC No	Name of Official	Father Name	Domicile	Date of Birth	Qualification	Prof Qualif:	Subject(s) in Master With Division	Year of B.Ed	Date of Ist: Apptt:in Edu Deptt:	D/o Apptt / Promotion to SST Post	Date of Regular: Notification	Merit Score	Advertisement No & Date	Method of Recruitment	School/Office
8753		Ameen Ullah		Battagram	15/08/1994	M.Sc	B.Ed	Mathematics	2016	28/04/2017	28/04/2017	29/03/2018	98.46	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS phagora
8754		Raza Khan		Dir Upper	16/02/1991	M.Sc	B.Ed	Physics	2015	24/09/2017	24/09/2017	30/08/2018	98.33	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Badarkani
8755	13101-7657727-1	MUHAMMAD ZARAB	MUHAMMAD ZARDAD	Abbottabad	01/01/1992	M.Sc	B.Ed	Chemistry	2016	25/04/2017	25/04/2017	22/03/2018	97.17	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS TOHEEDABAD
8756		Sher Zada		Kohistan Upper	15-01-1991	M.Sc	B.Ed		2013	13/12/2018	13/12/2018	29/03/2018	96.58	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Kafar Banda
8757		Naveed Ahmad		Haripur	13/01/1990	M.Sc	B.Ed	Environmental Sciences	2015	20/04/2017	20/04/2017	22/03/2018	95.98	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Gulham Haripur
8758		BABAR FAYAZ		Peshawar	11/03/1992	B.Sc	B.Ed		2014	12/10/2017	12/10/2017	16/03/2018	95.70	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS PUSHTAKHARA BALA
8759		Shumail Khan		Haripur	05/03/1993	B.Sc	B.Ed		2015	20/04/2017	20/04/2017	22/03/2018	95.45	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Ghazi Haripur
8760		Adnan Rustam		Haripur	08/04/1987	M.Sc/M.Phil	B.Ed	Environmental Sciences	2015	05/06/2017	05/06/2017	22/03/2018	95.38	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	DEO Female Haripur
8761		Maqbool Jalal		Chitral	04/06/1984	M.Sc	B.Ed	Pak studies	2013	23/06/2017	23/06/2017	22/03/2018	94.43	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Sweer
8762		Imtiaz Ahmad		Battagram	01/06/1992	B.Sc	B.Ed		2016	28/04/2017	28/04/2017	29/03/2018	92.35	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS glibori
8763		Abdullah		Battagram	01/02/1992	MA	B.Ed		2016	28/04/2017	28/04/2017	29/03/2018	90.68	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Hill
8764		Adnan		Battagram	04/08/1993	M.Sc	B.Ed	Mathematics	2015	28/04/2017	28/04/2017	29/03/2018	90.52	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS bilandkot
8765	13101-3108978-3	SHAMS UD DIN	ABDUR RASHEED	Abbottabad	04/04/1984	MA	B.Ed	Urdu	2014	18/04/2016	18/04/2016	22/03/2018	89.52	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS No 2 ATD
8766		Umar Siddique		Battagram	21/02/1994	B.Sc	B.Ed		2017	28/04/2017	28/04/2017	29/03/2018	89.30	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS pahto alai
8767		Muhammad Idrees		Kohistan	03/03/1993	LLB	B.Ed		2016	28/04/2017	28/04/2017	29/03/2018	88.87	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS Maidan Kolai Kohistan
8768		Akmal Wahab		Battagram	05/01/1993	B.Sc	B.Ed		2013	28/04/2017	28/04/2017	29/03/2018	87.02	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS neher alai
8769		Salfur Rehman		Battagram	01/10/1990	B.Sc	B.Ed		2015	28/04/2017	28/04/2017	29/03/2018	87.57	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS joze
8770		Munib Urehman		Tank	17/02/1991	M.Sc	B.Ed	Zoology	2018	31/03/2016	31/03/2016	16/03/2018	86.33	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHSS Mulazai Tank
8771		SM Tajuddin Shah		Battagram	08/06/1992	MA	B.Ed	Pol. Science	2016	28/04/2017	28/04/2017	29/03/2018	84.55	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHS banna alai
8772		Habib Ur Rahman		Kohistan	12/04/1990	M.Sc	B.Ed		2016	28/4/2017	28/4/2017	29/03/2018	83.99	INF(P)4736 Dated 30/09/2016	Regularized through Act 2018	GHSS Chakai Lower Kohistan
8773		Rasool Khan		Swat	20/09/1971	MA	B.Ed		2011	09/04/1996	09/04/1996	09/01/2018			By Promotion	GHS Touran Nav
8774	15701-1187268-5	SHAH HUSSAIN	HABIB KHAN	Tank	28/01/1972	MA	B.Ed		1999	18/03/1992	18/03/1992	13/01/2018			By Promotion	GHS Chukiatan
8775		Sarfraz Ali		Dir Upper	03/06/1976	M.S/M.Phil	B.Ed	Electronics.Education	2004	01/09/2003	01/09/2003	24/01/2018			By Promotion	GHS Zeran
8776		Gohar Ali	Manzar Ali	Kurrani	29 10 1968	BA,B.Sc	B.Ed		1998	19/09/1998	19/09/1998	28/02/2018			By Promotion	GHS Shingak Parachinar Upper Kurrani
7		BARKAT ALI KHAN		Swat	01/04/1984	M.Sc	B.Ed	Chemistry	2010	07/01/2011	07/01/2011	28/02/2018			By Promotion	GHSS KALAM
		ABDUR RASHID		D.I.Khan	21/06/1986	MA	B.Ed	Islamiyat	2010	10/09/1987	10/09/1987	22/03/2018			By Promotion	GCMHS NO1 DI KHAN

S No	CNIC No	Name of Official	Father Name	Domicile	Date of Birth	Qualification	Prof Qualif:	Subject(s) in Master With Division	Year of B. Ed	Date of Ist: Apptt: in Edu Deptt:	D/O Apptt / Promotion to SST Post	Date of Regular Notification	Merit Score	Advertisement No & Date	Method of Recruitment	School/Office
2776		ABDUR RAHID		DI Khan	21-08-1965	MA	B Ed	Islamiyat	2010	10-09-1987	10-09-1987	27-03-18				
2775		SACHIR AHMED		DI Khan	03-06-1995	MA	M Ed	History	2009	10-09-1987	10-09-1987	27-03-18			By Promotion	GCMHS NO1 DI KHAN
2786	15302-2747041-9	ZUBAIR KHAN	KHANI ZADA	Dist Lower	20-02-1988	M Sc	E Ed	Ecology	2012	08-11-2010	08-11-2010	27-03-18			By Promotion	GHS YARI KHEL
2781		Mutabar Ghani		Khyber Upper	03-01-1977	MA			2014	25-05-2004	25-05-2004	25-03-18			By Promotion	ADEO East Pk. (M) Kohistan

**Certificate**

- 1- That the Certainty is duly certified.
- 2- That the Certainty is independent/uncontroversial.
- 3- That there is no objection regarding the same.

  
 Assistant Director (Male-I)  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar

11/03/2022



**To**  
**The Director,**  
**Elementary and Secondary Education KPK,**  
**Peshawar.**

**Subject; Departmental appeal against the seniority of SST 2009 ( Adhoc to regularized ) in th light of Honorable Supreme Court CPs No 290 to 297 Dated 02-06-2022 in favour of SS Recommended through KPPSC.**

**Respected sir,**

That the appellant was recommended SST (G) through KPPSC (2011-2012) accordance with Advertisement No (01-2009) with proper recruitment regulation 2003 of KPPSC Peshawar.

**Copy of Advertisment is annexed as an annexure "A".**

That under the section 4 of The KPK, regulization of service Act 2009, the SST initially appointed on Adhoc basis and later on regularized under KPK (Regularization of service Act 2009, Rank Junior to the employees who were appointed on the recommendation of KPK PSC before the commencement of Act, irrespective of the actual date of appointment. **Copy of the Act 2009 is annexed as annexure "B".**

That the Honorable Supreme court of Pakistan have passed the judgment in same nature case in the light of entire scenario in CP NOs 290 to 297 Dated 22-06-2022, That the recommended SSs appellants will be senior to Adhoc to regularized SSs into seniority, then promotion will be accordingly. **Copy of judgment of SC is annexed as annexure "B."**

**That** the stance of recommended SS and Appellant SST are same. Department have not treated with Appellent equally same as recommended SSs Appointees. It is clear cut discrimination treated with SST Appellant, and it is violation of the said Act.

That the Adhoc to regularized SSTs (2009,2010), those who have promoted SSTs to SSs rather than recommended SSTs against the

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section 4 of Assembly Act KPK (Regularization of service) Act 2009, they placed on senior to as next coming recommended SSTs to SSs as subject wise. **Copy of seniority list of Regularized promotes is annexed as annexed "C."**

The right of appellant is accrued, so being aggrieved, appellant has file Departmental appeal before the Appellent authority to resolve the matter accordingly.

It is therefore requested before the competent authority that our rights are accrue against the discrimination with SST (KPPSC ) to be granted seniority like as SS (KPPSC) in the light of honorable Supreme court Dated 02-06-2022 in CPs No 290 to 297 regarding title Badshah Zamin and others VS Siraj khan and others. We hope that you will accept our appeal and remaintain the seniority promoted on SSs, place them on junior accordingly.

Thanks,

  
**ASHFAQ AHMED SST (G)**  
GHSS Beran Gali, Abbottabad

Date; 14-4-2023

Copy to---

1) SECRETARY OF ELEMENTARY AND SECONDARY EDUCATION  
KPK PESHAWAR.

2) CHAIRMAN KPK PUBLIC SRVICE COMMISSION, PESHAWAR.

IN THE SUPREME COURT OF PAKISTAN  
(Appellate Jurisdiction)

PRESENT:

MR. JUSTICE SAJJAD ALI SHAH  
MR. JUSTICE JAMAL KHAN MANDOKHAIL

Civil Appeals No. 290 to 297 of 2022  
(On appeal from the judgments of the Khyber  
Pakhtunkhwa Service Tribunal dated  
17.11.2020 in Service Appeal Nos. 126, 127,  
129, 131 of 2019 and 805 of 2018)

Badshah Zamin & others (in all appeals) ... Appellant(s).

VERSUS

Siraj Khan & others (in CA 290)  
Inayat ur Rehman & others (in CA 291)  
M. Rafi and others (in CA 292)  
Guld Ayub & others (in CA 293)  
Dost Muhammad & others (in CA 294)  
Zarif Shad & others (in CA 295)  
Jamal ud Din & others (in CA 296) ... Respondent(s)

For the Appellant(s) : Mr. Muhammad Shoaib Shaheen, ASC  
(in all appeals)

For Private Respondents : Mr. Aftab Alam Yasir, ASC

For KPK : Mr. Zahid Yousaf Qureshi, Addl. AG  
Shahid Iqbal, L.O. (KPPSC)

Date of Hearing : 02.06.2022

JUDGMENT

Jamal Khan Mandokhail, J. We intend to dispose of all these appeals through this judgment as the question of law in all the appeals is common and these are directed against a consolidated judgment dated 17.11.2020 passed by the Khyber Pakhtunkhwa Service Tribunal, Peshawar.

2. Facts in brief are that the respondent No.1 was appointed as Subject Specialist on contract basis in

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*dy*  
Senior Court Associate  
Supreme Court of Pakistan  
Islamabad

the Education Department of Khyber Pakhtunkhwa (KP), in the year 2005. The KP government promulgated the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 (the Act), on 24<sup>th</sup> October 2009. Pursuant to the Act, the services of employees of KP government appointed on contract or *ad hoc* basis, holding the posts on 31<sup>st</sup> December 2008 till the promulgation of the Act were regularized, consequently, services of the respondent No.1 were also regularised.

3. It is important to mention here that before promulgation of the Act, the education department KP invited applications from suitable candidates for appointing them against different posts of Subject Specialist. The process was started by the Khyber Pakhtunkhwa Public Service Commission (the KPPSC). In view of the fact that the candidates were large in number, therefore, it could not be possible to recommend all the candidates at one go. Consequently, the KPPSC on 15<sup>th</sup> September 2009 recommended the first batch for their appointment. The process of recommendation was continued and ultimately it was completed when the last batch was recommended on 11<sup>th</sup> June 2010. The official respondents issued a seniority list, whereby the appellants were placed senior to the respondent No.1 and others, vide seniority list dated 13.12.2017. The respondent No.1 feeling aggrieved, filed a departmental appeal, which remained un-responded, as such, he approached the learned Peshawar High Court because of the fact that by that time, the Khyber Pakhtunkhwa Service Tribunal (the Tribunal) was not functioning. When the Tribunal started functioning, the learned High Court referred the matter to it for adjudication and decision. The Tribunal asked the respondent No.1 to file proper memo of appeal, which he did and the appeal was registered

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*[Signature]*  
Senior Court Associate  
Supreme Court of Pakistan  
Islamabad



accordingly. After hearing the parties, the Tribunal allowed the appeal of the respondent No. 1 in the following terms:

"10. In view of the situation, appeals are accepted, the impugned Seniority list dated 13.12.2017 stands set aside with directions to respondent department to correct/modify the impugned seniority list and the persons whose services were regularized vide notification dated 31.05.2010 w.e.f. 24.09.2009 under the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 shall be placed senior to all those persons recommended by the Commission after the commencement of the Act *ibid* as per provisions contained in Section 4 of the Act *ibid*. No order as to costs. Filed be consigned to the record room."

4. The appellants filed civil petitions which were converted into appeals, by means of the order dated 10.03.2022, which is reproduced herein below:

"After hearing the learned counsel for the parties, and in the facts and circumstances of the case, we find it appropriate to grant leave to appeal in the instant petitions to examine the question as to what, in terms of section 4 of Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2003, and the other relevant law and regulation, would be the point of initiation of recommendations by the Khyber Pakhtunkhwa Public Service Commission ("KPPSC"), and as to when in fact such initiation commenced in respect of the petitioners.

2. At this point in time, Mr. Muhammad Shoaib Shaheen, the learned counsel for the petitioners requests to the Court to allow him to implead KPPSC in this case. The request is allowed. The amended memo of petition be accordingly filed within a week, so that notices be issued to KPPSC for a date after four weeks."

5. Heard the learned counsel for the parties and have perused the record. The controversy between the parties revolves around Sections 3 and 4 of the Act, which are reproduced herein below:

"3. Regularization of services of certain employees.—All employees including recommendees of the High Court appointed on contract or adhoc basis and holding that post on 31<sup>st</sup> December, 2000 or till the

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Supreme Court of Pakistan  
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commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

4. Determination of seniority.—(1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

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

Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one."

(Emphasis supplied)

6. Perusal of the above provisions of the Act would reveal that the contract and *ad hoc* employees, holding the post on 31<sup>st</sup> December 2008 till the commencement of the Act shall be deemed to have been appointed on regular basis w.e.f. 24<sup>th</sup> September 2009, i.e. the date of the promulgating of the Act. The issue between the private parties in the appeals is with regard to the determination of their seniority. According to section 4 of the Act, the employees whose services are regularized pursuant to the Act, "shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment." Through this section, the law-makers have given preference to those employees, who

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were recommended by the KPPSC for their appointment, before the promulgation of the act, irrespective of their actual date of appointment.

7. The first batch of the employees was recommended by the KPPSC on 15<sup>th</sup> September 2010, before the commencement of the Act, whereas, because of bulk of the candidates, the recommendations of rest of the candidates were made on different dates, after the commencement of the Act. The question before us is that rest of the candidates, who were recommended by the KPPSC for their appointments, after the commencement of the Act, would get the benefit of section 4 of the Act or otherwise? The relevant provisions of the Act are required to be read alongwith Section 35(3)(a) and (b) of the Khyber Pakhtunkhwa Public Service Commission Regulations, 2003 (the Regulations), which are reproduced herein below:

"35. RECOMMENDATIONS.

(1) ---

(2) ---

(3) (a) Where a large number of subjects/specialties are included in an advertisement, recommendations may not be pended till the finalization of the entire batch but instead zonal allocation be worked out subject-wise and recommendation conveyed to the Department without indicating to them the zonal allocation and the inter-se-seniority. In recommendations to the Department it shall be made clear that the inter-se-seniority of the recommendee is linked with other subjects and the overall merit position and zonal adjustment will be intimated on the completion of interviews in all subjects.

(b) The combined merit list shall be against a particular advertisement where by the posts were advertised collectively but recommendations were staggered due to interview schedule or any other reason."

8. In clause (a) of sub-section (1) of section 35 of the Regulations, it has been clarified that where a large

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number of candidates apply for a large number of posts, the recommendations may not be pending till the finalization of the entire batch. In case the recommendation of any batch is made, in the first instance, following by recommending other batches of the candidates for their appointment, the *inter se* seniority shall be on the basis of their merits, determined by the KPPSC, without taking into account the dates of recommendations. The intention of the law-makers is very much clear that in case of more than one candidate, if the recommendation of the commission is withheld or delayed in respect of one or more candidates, for want of completion of the process or for any other reason, beyond the control of the candidates, the recommendations of the commission made subsequently on different dates, are to be considered to have been made by the commission on the dates, when first recommendation was made. Under such circumstances, the date of the recommendations of the first batch, sent to the competent authority for the appointment shall be considered as the date of recommendation for all.

9. Admittedly, the recommendation of the first batch amongst the appellants were made by the KPPSC to the competent authority on 15.09.2009, whereas the Act was promulgated on 24.10.2009, therefore, the recommendations of all the appellants shall be deemed to have been made to the competent authority prior to the commencement of the Act, irrespective of the subsequent recommendations and dates of their appointments. Hence, the services of those employees, which were regularized pursuant to the Act, shall rank junior to those candidates, whose recommendations were made by the KPPSC, prior to the commencement of the Act. The department while constructing the seniority list was right

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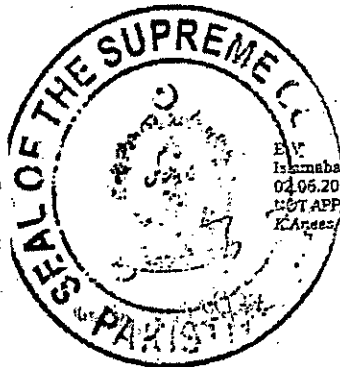
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in placing the appellants senior to those who were regularized pursuant to the Act. The list has wrongly been reversed by the Tribunal, which amounts to mis-interpretation of the relevant provisions of law, which is an illegality, on the basis whereof, the judgment impugned is not sustainable.

These are the reasons for our short order dated 02.06.2022, which is reproduced herein below:

"For the reasons to be recorded separately, all these appeals are allowed and the orders of the Khyber Pakhtunkhwa Service Tribunal, Peshawar are set aside."

Sd/- J  
Sd/- J



ISLAMABAD,  
02.06.2022  
NOT APPROVED FOR REPORTING  
K.Anees/-

Certified to be True Copy

*[Signature]*  
Senior Court Associate  
Supreme Court of Pakistan  
Islamabad

11441/2022

Civil/Criminal

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# وکالت نامہ

کورٹ فیس

سروس ٹریٹمنٹ لیکچر

بعدالت

اسٹیفانی ایلیم بنام

عنوان:

وکیل

منجانب:

نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام  
عمران کونسل سان جسٹس ایلڈ کورٹ بائی کورٹ

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا و رضاب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست، ہمراد استجارت نالٹش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔ لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

ASR

المرقوم: 2023-07-21

بمقام:

