


09.08.2023

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Faheem Khan, Assistant for the respondents present.

2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 05.12.2023 before D.B. P.P given to parties.

**SCANNED
KPST
Peshawar**


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

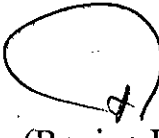
*KaleemUllah

01.12.2022

Junior to counsel for the appellant present.
Muhammad Adeel Butt learned Additional Advocate
General for respondents present.

File to come up alongwith connected Service
Appeal No. 1164/2019 titled "Muhib Ullah Vs
Education Department" on 02.03.2023 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

2nd Mar, 2023

Junior of Mr. Noor Muhammad Khattak, Advocate
present and filed Wakalatnama which is placed on file.
Mr. Muhammad Jan, District Attorney for respondents
present.

Junior to learned counsel for the appellant seeks
adjournment on the ground that learned senior counsel is
not available. To come up for arguments on 18/5/2023
before DB. PP given to the parties.

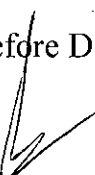

(Rozina Rehman)
Member (Judicial)



(Kalim Arshad Khan)
Chairman

18.05.2023

Junior of learned counsel for the appellant present. Mr. Asif Masood
Ali Shah, Deputy District Attorney for the respondents present.

File to come up alongwith connected Service Appeal No. 1164/2019
on 09.08.2023 before D.B. Parcha Peshi given to the parties.


(Muhammad Akbar Khan)
Member (E)


(Salah-ud-Din)
Member (J)

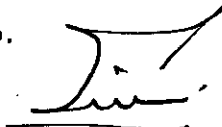
SCANNED
KPST
Peshawar

SCANNED
KPST
Peshawar

19.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 21.07.2022 before the D.B.



(Salah-ud-Din)
Member (Judicial)


21.07.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General alongwith Bakhtmal Jan Litigation Officer for respondents present.

File to come up alongwith connected Service Appeal No.1164/2019 titled "Mohib Ullah Vs. Government of Khyber Pakhtunkhwa" on 27.09.2022 before D.B.


(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)


27.09.2022

Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.1164/2019 titled "Muhib Ullah Vs. Education Department" on 01.12.2022 before D.B


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

20.12.2021

Counsel for the appellant and Mr. Muhammad Muhammad Adeel Butt, Addl. AG for the respondents present.

The respondents were afforded with last opportunity for submission of written reply/comments but even today they have not submitted reply/comments and seek adjournment through learned AAG. Let the respondents be afforded with another last chance subject to cost of Rs. 2000/- on or before next date with the warning that in case they fail to submit the written reply/comments and cost, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 22.02.2022 before the D.B.


Chairman

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 19.05.2022 for the same as before.


Reader.

30.12.2020

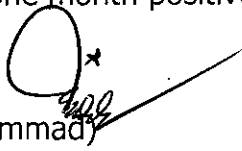
Due to summer vacation, case is adjourned to
17.3.2021 for the same as before.


Reader

17.03.2021

Counsel for the appellant and Addl. AG for the respondents present.

On 13.08.2020, the proceedings were adjourned for arguments; however, on subsequent two occasions, the matter was adjourned on the strength of Reader's Note. Learned AAG requests for time to furnish the reply/comments due to the said reason. Adjourned to 19.05.2021. On the next date arguments on the appeal shall be addressed while the respondents shall furnish the reply within one month positively.


(Mian Muhammad)
Member (E)


Chairman

19.5.2021

*Due to COVID-19, the case is
adjourned to 10-9-2021 for the same.*

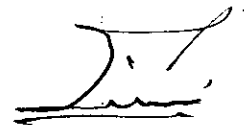


10.09.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 20.12.2021.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

28.10.2020

Proper D.B is on Tour, therefore, the case is
adjourned for the same on 30.12.2020 before D.B.


Reader

13.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 07.07.2020 for the same. To come up for the same as before S.B.


Reader

07.07.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for the respondents present and seeks time to submit comments. Last chance is given for submission of reply as well as for reply to application for suspension of notification, on 13.08.2020 before S.B



Member (J)

13.08.2020

Counsel for the appellant present. Nemo for the respondents.

Despite last opportunity, the respondents have not furnished the requisite reply/comments. The matter is, therefore, posted to D.B for arguments on 28.10.2020.


Chairman

04.12.2019

Counsel for the appellant present.

27/01/2020
Contends that the appellant holds a master's degree in Computer Science and is presently performing duty as SST (General/Science) BPS-16. He is fully qualified for promotion against the post of Subject Specialist (IT) BPS-17 in view of notification dated 24.07.2014 issued by the respondent department. He, however, has been denied such promotion ostensibly on the strength of minutes of SSRC meeting dated 10.08.2017. Referring to copy of minutes learned counsel contended that no quota for promotion of officials similarly placed and including the appellant has been earmarked for the requisite promotion. The said act of respondents is tantamount to denial of valuable service rights of appellant.


In view of the available record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 27.01.2020 before S.B.


Appellant Deposited
Security & Process Fee


Chairman

27.01.2020

Clerk to counsel for the appellant present. Written reply not submitted. Irfan Assistant representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 04.03.2020 before S.B.


Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1165/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2019 <i>RECEIVED 20/09/19</i>	<p>The appeal of Mr. Attiq-ur-Rehman resubmitted today by Mr. Saadat ULLah Khan Tangi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p><i>[Signature]</i> REGISTRAR 20/9/19</p>
2-	23/09/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/10/19.</u></p> <p><i>[Signature]</i> CHAIRMAN</p>
	25.10.2019	<p>Nemo for the appellant.</p> <p>Notice be issued to appellant/counsel for preliminary hearing on 04.12.2019 before S.B.</p> <p><i>[Signature]</i> Chairman</p>

The appeal of Mr. Atiqur Rehman son of Amir Hamza SST GHS Bragi Lakki Marwat received today i.e. on 29.07.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be attested.
- ④ Copy of appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- ⑤ Copy of Writ Petition in respect of appellant mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.
- 6- Necessary party may be made in the heading of the appeal.

No. 1344 /S.T,

Dt. 31-7- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadatullah Khan Tangi Adv. Pesh.

Sir, Resubmitted after completion

Objection no.4 and 5 are still stand therefore, the appeal in hand is returned again to the counsel for the appellant for completion and resubmission within 15 days. *12/8/19*

No. 1475 /S.T,

Dt. 23/8 /2019.


REGISTRAR

Mr. Saadatullah Khan Adv. Pesh.

Sir, Re-Submitted after completion

the same may kindly be clubbed with

Case title "Ghulam Abbas vs Govt

fixed for 30.9.01P



19.9.01P

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 1165 /2019

Atiqur Rahman **Appellant**

Versus

Govt. of KP through Secretary Elementary & Secondary
Education, Peshawar..... **Respondent**

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4.	Copy of Appointment Letter	A	8-15
5.	Copy of Notification dt.24.07.2014	B	16-21
6.	Copy of minutes of the meeting	C	22-24
7.	Copies of departmental Appeal and Writ Petition	D & E	25-35
8.	Wakalatnama		36

Through

Appellant

Saadat Ullah Khan Tangi

Advocate High Court

Cell No.0331-5030566

Dated 18.07.2019

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Atiqur Rahman S/o Amir Hamza
 Appointed as SST, GHS Bragi,
 Tehsil & District Lakki Marwat.....**Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar
2. Govt. of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat, KPK Peshawar
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

.....**Respondents**

Service Appeal U/S 4 of the Service Tribunal Act, 1974 against the non consideration of the appellant for promotion to the post of SS(IT) in line with the Notification No.SO (PE)4-5/ SSRC/meeting/ 2012/teaching Cadre dated 24.07.2014 published in official gazette and the same notification be also inserted in service rules 2019 and the appellant be considered for promotion to the post of SS(IT) on the basis of having master degree in Computer Science and having at least five year service as S.S.T (General/Science)

Respectfully Sheweth:

The appellant humbly submits as under:

1. That the appellant having qualification of B.ED, Master in computer Science was appointed as S.S.T, BPS-16 vide order dated 30.04.2014. (Copy of appointment letter is Annexure "A").
2. That since his appointment till date the appellant is performing his duty to the best of his ability and has not given any chance to displeasure of his superiors.
3. That previously in the rules pertaining to the year 2014 the category of appellant i.e. Master in Computer Science was made eligible for promotion to the post of S.S BPS-17. (Copy of Notification dated 24.07.2014 is annexure "B").
4. That later on meeting of respondent was held on 10.08.2017 in which SSTs (General /Science) having M.Sc (Computer Science)/BS (Computer Science)/MIT may be given 50% quota for promotion to the post of SS(IT) B-17. (Copy of minutes of the meeting is annexure "C").

5. That the respondent in utter violation of the notification, and minutes of the meeting as aforesaid is making promotions from SSTs (General/Science) but to utter violation are not considering the appellant for the promotion to the post of S.S(IT).
6. That the respondent is bent upon not to insert the above mentioned notification in the Rules and thereby depriving the appellant from the promotion to the post of SS(IT).
7. That the appellant after exhausting departmental remedies knocked at the doors of august High Court for the redressal of his grievance but the Hon'ble High Court dismissed the Writ Petition for being non maintainable and directed the appellant to approach competent forum for redressal of his grievances. (Copies of departmental Appeal and W.P is Annexure "D" & "E" respectively).
8. That the appellant prefer the instant Appeal on the following grounds inter alia

GRUNDS:

- A. That the non-considering of the appellant for promotion to the post of SS(IT) despite having requisite qualification of M.Sc Computer Science is in clear violation of Notification dated 24.07.2014 and minutes of the meeting dated 10.08.2017.
- B. That the non-insertion of the category of M.Sc Computer Science for the purpose of promotion to the post of SS(IT) is also violative of notification and minutes of the meeting mentioned above.
- C. That the appellant is quite eligible for promotion to the post of SS(IT) according to aforesaid minutes and Notification but the respondents is bent upon to deprive the appellant from his legal rights of promotion to the post of SS(IT).
- D. That the respondent is under legal obligation to act in accordance with law.
- E. That career progress is the right of every individual under the constitution of Pakistan.
- F. That the appellant reserves the right to agitate other additional grounds at the time of hearing.

It is, therefore prayed that on acceptance of the instant appeal non-considering of appellant for to the post of SS(IT) BPS-17 may kindly be declared as illegal, without lawful authority and notification mentioned above dated 24.07.2014 be also inserted in service rules 2019 and the appellant be considered for promotion to the post of SS(IT) BPS-17 on the basis of his Master Degree in Computer Science.

Through

Appellant


Saadat Ullah Khan Tangi

Advocate High Court

Dated 18.07.2019

CERTIFICATE

No such like appeal has earlier been preferred before this Hon'ble Tribunal.



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Atiqur Rahman.....**Appellant**

Versus

Govt. of KP through Secretary Elementary & Secondary
 Education, Peshawar.....**Respondent**

AFFIDAVIT

I, Atiqur Rahman S/o Amir Hamza, Appointed as SST, GHS Bragi, Tehsil & District Lakki Marwat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by.


Saadat Ullah Khan Tangi
 Advocate High Court


DEPONENT
 CNIC#:11201-2038060-7

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Atiqur Rahman.....**Appellant**

Versus

Govt. of KP through Secretary Elementary & Secondary
 Education, Peshawar.....**Respondent**

ADDRESSES OF PARTIES

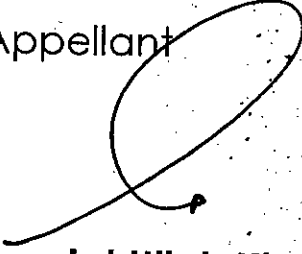
APPELLANT:

Atiqur Rahman S/o Amir Hamza
 Appointed as SST, GHS Bragi,
 Tehsil & District Lakki Marwat

RESPONDENTS:

1. Govt. of Khyber Pakhtunkhwa through Secretary
 Elementary & Secondary Education, Peshawar
2. Govt. of Khyber Pakhtunkhwa through Chief
 Secretary Civil Secretariat, KPK Peshawar
3. Director Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar

Appellant
 Through


Saadat Ullah Khan Tangi
 Advocate High Court

Dated 18.07.2019

Lakki Marwat Male SSTs Regularization order SST 2018

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9225339; 9225344.

Fax 091-9225343

Email: khattakfarid@gmail.com

**NOTIFICATION.**

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) and in pursuance of the Govt. of Khyber Pakhtunkhwa Notification No: SO(S/F) E&SED/3-2/2018/SIT/Contract, Dated: 16-02-2018, the Services of the following Secondary School Teachers (SST Bio/Chem), (SST Maths/Physics), (SST General) appointed on Adhoc/Contract basis, are hereby regularized in BPS-16, on the SST posts in Teaching Cadre on the terms and conditions given below with effect from the date of their appointments.

SST (Bio/ Chem)

Sr #	Name	Name	Address	Score	Name of School	Appointment order No and dated	Extension order No and dated if any
1	6010931	Irfan Ullah	Dalu Khel Distt Lakki Marwat CNIC No 11201-65778821	139.33	GHS Landa Ahmad Khel	2068-75 dated 30-4-2017	4913-10 dated 28-04-2017
2	6011146	Muhammad Rehman	Mohallah Saund Khel Village & P/O Tajori Teh & Distt Lakki Marwat CNIC No. 11201-4913075-7	135.49	GHS, Pahar Khel Pacca	-do-	-do-
3	1610516	Kaleem Ullah	Village Gulzar Po Tajzai District Lakki Marwat Kpk CNIC No 11201-4123466-1	132.01	GHS, Khawaja Khel	-do-	-do-
4	60112832	Nasir Khan	Burhan Book Seller Sarai Naurang Lakki Marwat CNIC No 11201-1102183-7	130.69	GHS Landiwa	-do-	-do-
5	1610556	Sabz Ali Khan	Village Sheikhula U/C Ahmad Khel Tehsil And District Lakki Marwat CNIC No 11201-0375844-3	129.57	GHS, Samandi	-do-	-do-
6	2310263	Farid Ullah	Village Gulbaz Dehqan Post Office Tajal Zai CNIC No 11201-2231685-7	129.21	GHS, Muhammad Amir Wali	-do-	-do-
7	2310212	Waheed Ahmad	Mohallah Dawat Khel Village P/O Zangi Khel CNIC No 11201-6661213-5	128.85	GHS Wanda Baroo	-do-	-do-

2017

Sr#	RollNo	Name	Permanent Address	Total Marks /out of 200	School applied for	Appointment order No and dated	Extension order No and dated if any
8	881000294	Nahid Ullah	Village And Post Office Kot Kashir Lakki Marwat CNIC No. 11201-3124826-7	147.33	GHSS, Bachkan Ahmad zai	4892-98. dated 28-4-2017	NA
9	881000209	Jalal Ud Din	Village Bachkan Ahmad Zai District And Tehsil Lakki Marwat Post Office Tajori Lakki Marwat CNIC No. 11201-4856307-9	138.49	GHS, Tari Khel	-do-	NA
10	601000889	Muhammad Owais Khan	Village Nar Sahib Zadar Khosht Tehsil Serai Naurang	134.43	Govt Shaheed Muhammad Ghassan CMHS, No1 Lakki City	-do-	NA

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Lakki Marwat Male SSTs Regularization order SST 2018

			Lakki Marwata CNIC No.11201- 9213652-7				
11	8810004 06	Rizwan Ullah	Village And Post Office Kot. Kashmir Tehsil Naurang CNIC No.11201- 5925371-3	134.41	GHS No1 Tajori	-do-	NA
12	8810002 05	Farman Ullah	Village And Post Office Masha Mansoor Tehseel And District Lakki Marwat CNIC No.11201-7856975-1	134.39	GHSS, Kheru Khel Pacca	-do-	NA
13	8810002 37	Imran Ullah	Village And P/O Zangi Khel Tehsil District Lakki Marwat CNIC No.11201- 6017141-3	134.32	GHSS, Abdul Khel	-do-	NA
14	8810002 62	Tariq Julal	Village Kuttli Khel Post Office Jhang Khel Tehsil Distt Lakki Marwat CNIC No.11201- 8872454-7	134.23	GHSS, Masha Mansoor	-do-	NA
15	8810002 97	Abdul Qadeer Khan	Vill And Po Masha Mansoor Distt And Teh Lakki Marwat CNIC No.11201- 8031628-6	134.02	GHSS, Tajazai	-do-	NA
16	8810002 59	Ata Ur Rehman	District And Tehsil Lakki Marwat , Po Lakki Marwat , Vilalge , Sarkatti Michen Khel Lakki Marwat CNIC No.11201- 4471122-1	133.87	GHS, No2 Lakki City	-do-	NA
17	8810002 25	Qudrat Ullah Khan	Village Masti Khel Po Isak Khel Tehsil And District Lakki Marwat CNIC No.11201- 4353751-7	133.72	GHS, Dabak Mandra Khe	-do-	NA
18	8810002 15	Waseem Ullah	Mohallah Haq Dad Abad Near Graban Tehsil District Lakki Marwat CNIC No.11201-3312883-7	133.54	GHSS, No1 Michan Khel	-do-	NA
19	8810002 87	Waseem Sajjad	Zari Jano Lakki Marwat CNIC 11201- 65516955	132.5	GHS, Dabak Mandara Khel	2352-08 dated 13-06- 2017	NA
20	8810001 86	Saeed Ur rehman	Village Pahar Khel Lakki Marwat CNIC# 11201- 85557339	132.36	GHSS Kot Kashmir	-do-	NA
21	8810002 58	Wali Ullah	Village Land Ahmad Khel Lakki Marwat CNIC# 11201- 76362291	131.9	GHS Abbasa	-do-	NA
22	8810002 47	Muhammad Furqan	Village Titer Khel Lakki Marwat CNIC# 11201- 13645143	131.6	GHS, Baragi	-do-	NA
23	8810002 64	Iftikhar Ahmad Khan	Maila Mandara Khel Lakki Marwat CNIC# 11201- 67574727	131.24	GHSS Masha Mansoor	-do-	NA

SST Maths Physics

Sr #	Roll No.	Name	Address	Score	Name of School	Appointmen t order No and dated	Extension order No and dated if
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10

Lakki Marwat Male SSTs Regularization order SST 2018

3. 13

							any
1	6020555	Atiqur Rahman	Village And Post Office Tajori Mohalla Dawar Khel District Lakki Marwat	136.01	GHS, Bragi	2076-8, dated 30-4-2014	4914-20 dated 28-4-2017
2		Iqbal Hussain	Hera Medical Store Hospital Road Serai Naurang Lakki Marwat Kpk CNIC No 11201-0390834-5	128.2	GHS Behram Khel	-do-	-do-
3	1620124	Muhammad Ismail Khan	Sarhad Clinical Laboratory Kakk Road Post Office Serai Naurang District Lakki Marwat. CNIC No 11201-4959501-1	127.98	GHS, Chuhar Khel	-do-	-do-
4	1620456	Insha Ullha Khan	Village Mirhazar Khazad Khel Post Office Ghazni Khel Tehsil And District Lakki Marwat CNIC No 11201-3703360-1	127	GHS, Kheru Khel Paccu	-do-	-do-
5	1620469	Saif Ur Rehman	The Suffar Secondary School Serai Naurang CNIC No 11201-5452146-1	126.24	GHS, Aghzer Khel	-do-	-do-
6	6020370	Haseen Ullah	District Lakki Marwat Village And Post Office Tajori Mohalla Dawar Khel CNIC No 11201-0972511-5	122.8	GHS Daraka Aziz Khan	-do-	-do-

2017

Sr	Roll No	Name	Permanent Address	Total Marks (Out of 200)	School applied for	Appointment order No and dated	Extension order No and dated if any
7	882000187	Furqan Ullah	Mohallah Gulbeg Khel Vill & P/O Nawarkhel Teh And CNIC No.11201-3752577-3	140.88	GHS, Wanda Baru	4892-98 dated 28-4-2017	NA
8	882000117	Hassan Khan	Ademzai P/O Tajori CNIC No.11201-0647594-1	135.29	GHS, Tari Khel	-do-	NA
9	882000210	Razu Khan	Bagh Colony Street Number 3 Shamsi Road Hoti Mardan CNIC No.11201-2353833-1	133.15	GHS, Jabu Khel	-do-	NA
10	882000333	Abdul Manan	Abdul Manan Son Of Gul Rehman Village Koto Khel Post Office Tajori Tehsil And District Lakki Marwat CNIC.No.11201-4578850-5	132.74	GHS, Wanda Samandi	-do-	NA
11	982000092	Khalid Mehmood	Khalid Mehmood Mohallah Muslimabad Near City Hospital Lakki Marwat CNIC No.11201-9314218-7	131.5	GHS, Wanda Aurangzeb	-do-	NA
12	882000067	Safdar Ali Shah	Village Baist Khel Post Office Serai Gambila Lakki Marwat CNIC No.11201-3983691-9	129.33	GHS, Wanda Shahab Khel	-do-	NA
13	882000425	Kifayat Ullah Khan	Mohallah Lakki Michen Khel Distt And Tehsil & P/O Lakki Marwat CNIC No.11201-	129.28	GHSS, Landiwah	-do-	NA

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4 12

Lakki Marwat Male SST's Regularization order SST 2018

			1424434-3				
14	882000380	Aziz Ur Rehman Khan	Mirazam Lakki Marwat CNIC# 11201-55309061	128.5	GHS, Abbasa	-do-	NA
15	882000172	Wajahat Imran	Village Titter Khel Lakki Marwat CNIC# 11201-58949053	140.3	GHS, Pahar Khel Paccu	3318-24 dated 11-6-2017	NA

(SST General)

S#	Roll No	Name	Address	Score	Name of School	Appointment order No and dated.	Extension order No and dated if any
	1631061	Muhammad Nazir	Mohallah Haqqad Abad Lakki Marwat Post Office CNIC No.11201-0323542-7	135.4	GHS Tari Khel	2084-31 dated 30-3-2014	4913-20 dated 28-3-2017
	1631227	Bin Yamin Khan	Teh House Of Wisdom School Serai Naurang CNIC No 11201-0365300-1	133.62	GHS Amandi	-do-	-do-

2015

Sr	RollNo	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
3	1631017	Ejaz Ahmad	Mohallah Malo Khel Vill. & PO Landiwah Lakki Marwat CNIC No.11201-7525640-9	139.73	GMS, Landi Mir Salami	3898-3904 dated 30-11-2015	NA
4	1630441	Muhammad Subhan	Mohallah Qureshian Vill. & PO Tajori Lakki Marwat CNIC No.11201-0369783-3	136.7	GMS, Nazar Jan Baltani	-do-	NA

2017

Sr	RollNo	Name	Permanent Address	Total Marks (Out of 200)	School applied for	Appointment order No and dated	Extension order No and dated if any
5	233002787	Yasir Adnan	Marwat House Al Waris City Bannu Road D I Khan CNIC No.11201-5248040-3	154.39	GHS, Chuhar Khel	1976-32 dated 12-05-2017	NA
6	883000313	Muhammad Salman Farooqui	Village Marmandi Multan Post Office Serai Naurang District Lakki Marwat CNIC No.11201-9499698-5	149.71	GHS, Top Takhti Khel	-do-	NA
7	603003720	Wasif Ullah	Post Office Gandhi Khan Khel District Lakki Marwat CNIC No.11201-3897764-1	147.86	GHSS, Kheru Khel Pacca	-do-	NA
8	883000780	Hafiz Ikram Ullah	House Mohallah Saeed Khel Tehsil And District And City Lakki Marwat CNIC No. 11201-9484983-5	143.81	GHS, Abbasa Khattak	-do-	NA

TERMS & CONDITIONS.

- The regularization will not be in favour of those, who have not taken over charge OR has remained absent from duty OR resigned from service and also not for those who are under disciplinary proceedings.
- Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturer, Instructors and Doctors) Regularity Act, 2011 and such rules and Regulations as may be issued from time to time by the Government.
- Their pay shall be released subject to the verification of academic and professional documents/ testimonials from the concerned boards/universities by the District Education Officers Concerned.
- Their services will be considered regular and they shall be eligible for pension/ deduction of GP Fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 as amended in 2013.
- Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
- They shall possess the same qualification and experience required for the subject post on regular basis.

12

Lakki Marwat Male SSTs Regularization order SST 2018


5

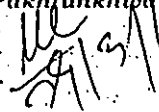
7. Their regularization shall not affect the promotion quota of the existing holders of posts in respective service cadre. They shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service 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.
8. Their seniority shall be determined on the basis of their continuous services in cadre, provided that if the date of continuous service in case of two or more employees is the same, the employee elder in age shall rank senior to the younger one.

(Farid Ahmad Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encls: No.6377-84/ File No.23/A-14/SST/Adhoc/Applt: Dated Peshawar the 29-03-2018.
Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Male) Lakki Marwat.
4. District Accounts Officer Lakki Marwat.
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File


Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar





13 Qurtuba University

of Science and Information Technology
D. H. Khan, D. H. Khan, D. H. Khan, D. H. Khan, Pakistan.

Transcript

Serial No.: 10148

Student's Name: Atiqur Rahman

Father's Name: Amir Hamza

Program: MS. Computer Science

Student's I.D.: 7798-D

Session: Fall-2013

Sem.	Title of Course	Cr.	Mks%	LG	NG	GP	GPA	Remarks	
Fall 2013	Cloud Computing	3	68.0	C+	2.5	7.5	3.38		
	Parallel & Distributed Simulation System	3	75.0	B+	3.5	10.5			
	Advance Computers Networks	3	79.0	B+	3.5	10.5			
	Research Methodology	3	87.0	A	4.0	12.0			
Spring 2014	Advance Theory of Computation	3	90.0	A+	4.0	12.0			
	Advance Operating System	3	82.0	A	4.0	12.0			
	Advance Computer Architecture	3	77.0	B+	3.5	10.5			
	Advance Algorithm Analysis	3	80.0	A	4.0	12.0			
	Research Thesis / Viva	6	81.0	A	4.0	24.0			
Total Cr. Hrs.							30	3.92	

Total Cr. Hrs. 30

C.G.P.A.: 3.70

Errors and Omissions Excepted

Result Declared on May 13, 2016

Issued at Peshawar on May 25, 2016

Prepared by:

Verified and Checked by:

Additional
Controller of Examinations

Legend

Sem: Semester
Mks: Marks Obtained
NG: Numeric Grade
GPA: Grade Point Average
CGPA: Cumulative Grade Point Average

Cr: Credit Hours
LG: Letter Grade
GP: Grade Point
MI: Marks Improved
NC: Non Credit

Grading

Marks	LG	NG	Remarks
90 - 100	A+	4.0	Outstanding
80 - 89	A	4.0	Excellent
75 - 79	B+	3.5	V. Good
70 - 74	B	3.0	Good

Grading

Marks	LG	NG	Remarks
65 - 69	C+	2.5	Fair
60 - 64	C	2.0	Pass
below 60	F	0.0	Fail



Qurtuba University
of Science and Information Technology
Bera Ismail Khan, Khyber Pakhtunkhwa, Pakistan

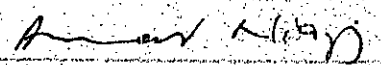
14
In recognition of
the successful completion of the course of study
this University has conferred on

ATIQR RAHMAN S/O AMIR HAMZA

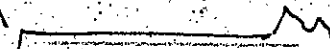
the degree of

MASTER OF SCIENCE (MS) in COMPUTER SCIENCE

Given this thirteenth day of May two thousand and sixteen


Controller of Examinations


Registrar

11

Vice-Chancellor

Roll No. 4514

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.
2008-USTB-18495

University of Science & Technology Bannu



Khyber Pakhtunkhwa
P.W.F.P. Pakistan

Session - 2008-2012

Atiqur Rahman

son of

Amir Hamza

a student of Institute of Engineering and Computing Sciences

having passed the prescribed examination held in November, 2012 is this day admitted by the

University of Science & Technology Bannu
to the Degree of

Bachelor of Science (Honours)


in Telecommunication (4-Year)

in 1st Division/Grade/G.P.A.

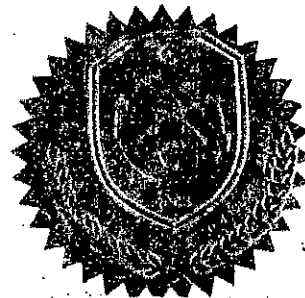
The examination was taken as a whole/~~in parts~~.

Result Declared on 28-01-2013

15


Controller of Examinations


Registrar




Vice Chancellor



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.

NOTIFICATION:

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

AMENDMENTS

In the Appendix,-

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

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)

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

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective column namely

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable candidate is available from among Senior Certified Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No. 3:</p>

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then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

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

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

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

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

(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

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

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

(5)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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


ZAMIN KHAN MOMANI
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

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

The following attended the meeting:-

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

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

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

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

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

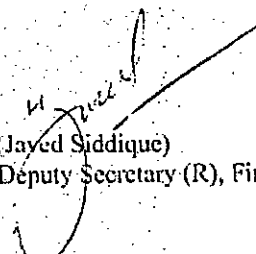
The committee members discussed the proposed amendments in the service rules/structure for the SST (General/Science) & SST (IT) in depth and were agreed upon unanimously.

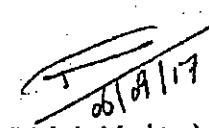
Decisions:

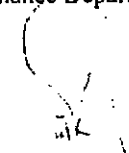
The following decisions were made in consensus: -


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


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

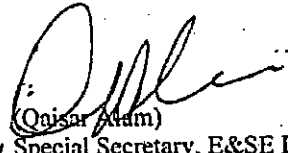

(Jayed Siddique)
Deputy Secretary (R), Finance Department

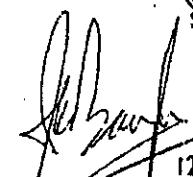

(Mohsin Mushtaq)
Assistant (R-I), E&AD Deptt:


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


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


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


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


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

12/9/17

To,

The Most Respected
Secretary E & SE Department
Khyber Pakhtunkhwa Peshawar.

Through: The Director

E & SE Department
K.P.K.

Subject; Application For S.S.T (Gen/Sc) Promotion to
SS(IT) according to the SSRC meetings
on 10/08/2017 & on 02/01/2018 Regarding
allotment of 50% & 20% Quota to S.S.T (Gen/Sc)
For Promotion to the Post of SS(IT)

Respect Sir,

that we i.e. (Atiqur Rahman, Mukib Ullah, Barkat Ullah,
Ali Akbar, Ihsan Ullah, Aftab Ullah, Eayyoon Khan, Gechar Zaman, Muhammad Anwar
Rohan Ullah, Arshad Ali Khan, Muzaffar Said, Niaz Ahmad, Mujahid Farooq, Saad,
Hussain Rehman, & Fazli Bari & Rafiq Ahmad Khan)

Serving against S.S.T (Gen/Sc) Posts in the E & SE Dept.

With most veneration it is to bring in your kind notice that
50% quota has already been allotted for S.S.Ts (Gen/Sc) in the
different subjects for Subject Specialist Post but unfortunately,
S.S.T (Gen/Sc) who have M.S (Computer Science) / B.S (CS) / M.IT
qualification & are eligible for promotion to the Post of SS(IT)

B.S-17 have no quota for promotion.

But in the SSRC meeting on 10/08/2017, E & SE Dept.
Proposed that all those S.S.T (Gen/Sc) who have M.Sc
(Computer Science) / B.S (CS) / M.IT may be given 50%

quota for promotion to the Post of SS (IT) BPS-17 Like other SSTs, so as to bring uniformity in teaching Cadre.

in the SSRC meeting on 02/01/2018 EOSE Dept. may be given 20% quota for Promotion.

Now according to the SSRC meeting on 10/03/2017 & on 02/01/2018 the quota should be properly notified.

Thanks

Dated: 13/09/2018

① Atiqur Rahman

DS (Admin)

② Mahib Ullah

[Signature]

etc.

Recd.

13/3/18

Dated: 13/3/2018

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{3}

To

The Director
E&SE Department,
Khyber Pakhtunkhwa Peshawar

Subject:- APPEAL FOR THE NOTIFICATION OF THE MINUTES OF THE MEETING OF THE SSRC ON 10/08/2017 REGARDING ALLOTMENT OF 50% QUOTA TO SST (GEN/SC) FOR PROMOTION TO THE POST OF SS-IT.

Respected Sir,

With most veneration it is to bring in your kind notice that 50% quota has already been allotted for SSTs (General/Science) in the different subjects for subject specialist post but unfortunately, SSTs (General/Science) who have M.Sc (Computer Science)/BS(CS)/MIT qualification & are eligible for promotion to the post of SS(IT) BPS-17 have no quota for promotion.

But in the SSRC meeting on 10/08/2017 E&SE Department proposed that all those SSTs (General/Science) who have MSc. (Computer Science)/BS(CS)/MIT may be given 50% quota for promotion to the post of SS(IT) BPS-17 like other SSTs, so as to bring uniformity in the teaching cadre.

Now according to the SSRC meeting on 10/08/2017 the seniority of SST(General/Science) and SST(IT) will be clubbed together immediately for the purpose of promotion.

Thanks

Date: 05/07/2018

Atiqur Rahman SST (Science)

Muhib Ullah SST (Science)

etc.

Read Only

5/07/18

The Director
Elementary & Secondary Education Department
Khyber Pakhtunkhwa, Peshawar
T-11001, Peshawar

Subject: **APPEAL FOR SST (Gen/Sc) PROMOTION TO SS(IT) POSTS
50% QUOTA**

R/Sir,
With due regards humbly beg to draw your kind attention to the following few lines for favourable consideration please

1. That we are serving against SST (Sc/Gen) post since 01.01.2009 in Elementary & Secondary Education Department Khyber Pakhtunkhwa
2. That at present we are serving against SST (SC) post at different schools
3. That we belong to district D.I. Khan, Khyber Pakhtunkhwa.
4. That we are possessing BS M.Sc/ MS Computer Science, M.Ed and M.Ed M.Phil (Education)
5. That vide the Notification No. SO(PE)-5/SSRC/Meeting/2013/Teaching Cadres of Elementary & Secondary Education Department, Peshawar dated 24.07.2014 approved promotion to SS posts (BPS-17) from SST (BPS-16). The SST regular having 50% quota of the total sanctioned SS posts allotted for promotion. (Photo copy attached)
6. That vide Notification No. SOG/E&SED/1-86/SS.IT/2016, of Elementary & Secondary Education Department, Peshawar dated 15.08.2016 the Competent Authority is pleased to notify the nomenclatures of Information Technology Teaching Cadre/Posts serving in the Government in High & Higher Secondary Schools of Khyber Pakhtunkhwa. Of Elementary & Secondary Education Department, as Existing Nomenclature Sr. IT Teacher BPS-17 to New Nomenclature Subject Specialist IT (SS-IT) BPS-17. (Photo copy attached)
7. It is also decided in SRC meeting held on 10.08.2017 chaired by Dr. Shehzad Bangish Secretary E&SE Education Department and six other respectable members that must provide the 50% quota to the SET (Gen/Sc.) (SRC minutes attached)
8. That therefore are in allotted above mentioned quota of various subjects (for example Eng, Urdu, Pashto, Math's, Botany, Zoology etc) SS posts to which promote the SST (Gen & Sc.) of various subjects except the SST

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15)

Subject Computer Science, who having no chance to promote
in the above policy of promotion, the SST (Gen/Sc: Subject Computer
Science) who having promotion due are deprived of their rights.

In the light of the above facts, it is requested that your kind honour to
this appeal for favourable consideration that at Higher Secondary level the
Specialist (H) posts to which promotion of the SST (Gen/Sc: Subject
Science) regular may please be allowed.

I shall be highly obliged for this act of kindness.

Yours Obediently,

- (1) Nasim Ullah
SST, GHS Haji Mora
- (2) Kallim Ullah
SET, GMS Lumda Para
- (3) Abdul Ahad
SST, GHS Gomai Kafan
- (4) Muhammad Bilal
SST, GHS Prova

To
The Most Respected
Director E&SE Department,
Khyber Pakhtunkhwa Peshawar

Subject:- APPEAL FOR THE NOTIFICATION OF THE MINUTES OF THE MEETING OF THE SSRC ON 10/08/2017 REGARDING ALLOTMENT OF 50% QUOTA TO SST (GEN/SC) FOR PROMOTION TO THE POST OF SS-IT.

Respected Sir,

With most veneration it is to bring in your kind notice that 50% quota has already been allotted for SSTs (General/Science) in the different subjects for subject specialist post but unfortunately, SSTs (General/Science) who have M.Sc (Computer Science)/BS(CS)/MIT qualification & are eligible for promotion to the post of SS(IT) BPS-17 have no quota for promotion.

But in the SSRC meeting on 10/08/2017 E&SE Department proposed that all those SSTs (General/Science) who have MSc. (Computer Science)/BS(CS)/MIT may be given 50% quota for promotion to the post of SS(IT) BPS-17 like other SSTs, so as to bring uniformity in the teaching cadre.

Now according to the SSRC meeting on 10/08/2017 the seniority of SST(General/Science) and SST(IT) will be clubbed together immediately for the purpose of promotion.

Date: 05.07.2018

Respected Sir
5/07/2018

Thanks

1. Muhammad Ibrahim (SST)
2. Muhammad Imran (SST)
3. Abdul Ghafoor (SST)
4. Muhammad Farooq (SST)
5. Ghulam Abbas (SST)
6. Muhammad Naseem Ullah Khan (SST)

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



1. Abdul Ahad S/O Ghulam Muhammad R/O Ahmad D.I.Khan currently working at GCMHS no. D.I.Khan as SST (Physics & Mathematics).
2. Kalim Ullah S/O Rehmat Ullah Cas Baluch R/O Mohallah Ahmad Saib Eld Gah D.I.Khan currently working as ASDEO SST (General) chodwan circle District D.I.Khan.
3. Dr. M. Naseem Ullah S/O Fateh Ullah R/O Gilluni Town near Wensum College D.I.Khan Currently posted at GHS Haji Mora as SST (General), (Phd).
4. Ghulam Abbas S/O Ghulam Qasim R/O Village Mialy Tehsil Parova D.I.Khan currently posted at GHS Mangal SST (General).
5. Abdul Ghafoor S/O Ghulam Nabl Khan R/O Village Lunda Para Tehsil Parova D.I.Khan currently posted as GHS Wanda Sheru D.I.Khan SST (General).
6. Muhammad Imran S/O Haji Ismail R/O Parova D.I.Khan currently posted at GMS Malaikhi SST (General).
7. Muhammad Bilal S/O Malik Muhammad Amir R/O Currently posted at GHS SST (General) Gara Rahid D.I.Khan.
8. Rafi Ullah S/O Hameed Ullah R/O Kot Nawaz District Tank, currently working as ASDEO Education Office Tank SST (General).
9. Asmat Ullah S/O Rahmat Ullah R/O Shadi Khel Village Daraki District Tank SST (General).
10. Muhammad Fareeq S/O Rahim Baksh R/O Village Chah Khan Wala Tehsil Parova D.I.Khan currently posted at GHS Parova as SST (Physics & Mathematics).

Shirvan

VERSUS

ATTESTED
EXAMINOR
Peshawar High Court
D.I.Khan Bench

1. Govt of Khyber Pakhtunkhwa through Secretary (K&S) Education Peshawar.
2. Govt of Khyber Pakhtunkhwa through Secretary Establishment Department Peshawar.
3. Govt of Khyber Pakhtunkhwa through Secretary Finance Department Peshawar.
4. Govt of Khyber Pakhtunkhwa through Secretary Law Peshawar.
5. Director General (K&S) Education Khyber Pakhtunkhwa Peshawar.
6. Deputy Director EMIS (S&SR) Department Khyber Pakhtunkhwa Peshawar.
7. District Education Officer (Male) D.I.Khan.
8. District Account Officer D.I.Khan.

**PETITION UNDER ARTICLE 199 OF CONSTITUTION
OF THE ISLAMIC REPUBLIC OF PAKISTAN, 1973.**

Respectfully Sheweth:

The facts leading rise to present writ petition in brief are:

1. That petitioner having degree of Bachelor of Science, appointed as Secondary School Teacher (General/Science). Copy of academic qualifications and notifications are annexure A & B.
2. That petitioner also acquired the degree of Master of Computer Science. Copy of Certificates is annexure C.
3. That respondent vide notification no. SO (PE) 4-S/SSRC/Meeting/2013/Teaching Cadre dated 24th of July 2014 approved some amendments regarding promotion of Secondary School Teacher BPS-16 to subject specialist BPS-17, according to which 50% promotion should be made on the basis of seniority cum fitness for the relevant subject amongst the SST with at least 5 year service along with 2nd class Master Degree or 4 year BS degree in the relevant subject. Copy of Notification is Annexure D.
4. That after the amendments some promotions were made but Secondary School Teacher (General/Science) were ignored reason best known to the respondents. In the

At Peshawar
 12-02-19
 EXAMINOR
 Peshawar High Court
 D.I. Khan District

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, D.I. KHAN BENCH
(Civil Department)

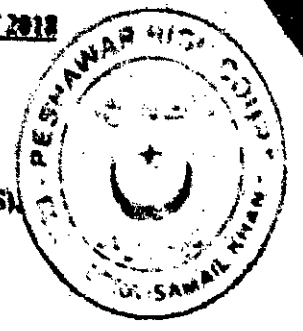
"E"

Writ Petition No. 577-D with C.A. Nos. 1099-D & 1101-D of 2018

Abdul Ahad and 9 others

Versus

Govt. of Khyber Pakhtunkhwa through Secretary (E&S),
Peshawar and seven others



JUDGMENT

Date of hearing: 30.01.2019

For petitioners: Muhammad Anwar Awan Advocate

For respondents: Mr. Kamran Hayat Miankbel, Addl:
A.G and Mr. Zia ur Rehman Qazi
Advocate

S.M. ATTIQUE SHAH, J.- Through the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioners Abdul Ahad and others have prayed that:-

"In wake of above submission it is respectfully prayed that on acceptance of this writ petition may kindly direct the respondent to collect the documents from SST (General/Science) for promotion as Subject Specialist (IT) and consider them according to rules. It is also further prayed that may kindly direct the respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist (IT) BS-17."

ATTESTED
EXAMINOR
Peshawar High Court
D.I. Khan Bench

2. The petitioners are serving as Secondary School Teacher (General/Science) and seek issuance of writ

Amir

directing the respondents to collect documents from SST (General/Science) for promotion as Subject Specialist (IT) and to consider them according to rules and further directions to respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist. Admittedly, the petitioners are civil servants and the matter in question relates to the terms and conditions of their service and in such like cases this Court has no jurisdiction to issue directions for the promotion of petitioners or direction for amendment in the Rules in question. In this respect, reliance is placed on the cases of Province of Punjab, Communication and Works Department, Lahore. Vs. Liaquat Ali Bukhari (1998 PLC(CS) 901), Muhammad Zafar Ali. Vs. Federation of Pakistan through Secretary Establishment, Islamabad (2018 PLC(CS) 116) and Hafiz Muhammad Ilyas. Vs. Government of Khyber Pakhtunkhwa (2018 PLC(CS) N 40). The Honourable Supreme Court of Pakistan in the case of Government of Khyber Pakhtunkhwa. Vs. Hayat Hussain (2016 SCMR 1021) held that:-

"No vested right of a government employee was involved in the matter of promotion or the rules determining their eligibility or fitness. High Court had no jurisdiction by means of constitution petition to strike down such rules."

FILED
22-02
EXAMINER
Jashwar High Co.
D. Khan Bt

That, in view of above facts, it has conclusively been resolved that High Court has no jurisdiction in entertain matters relating to civil servants regarding terms and conditions of their service, or any ground whatever.

3. Accordingly for the reasons stated above, this petition is not maintainable and is dismissed alongwith enlisted C.Ms and interim relief. However, the petitioners are at liberty to approach the competent forums for the redressal of their grievance, if so advised.

Announced
Dt. 30.01.2019.
JUDGE

JUDGE

JUDGE

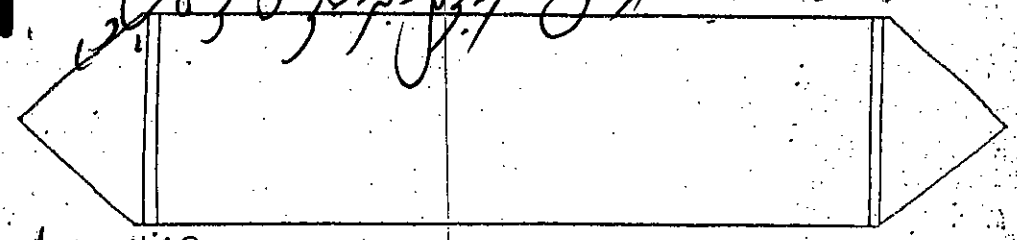
(Dy)
Hon'ble Mr. Justice S.M. Anwar Shah
Hon'ble Mr. Justice Michael Ahmed

off
12/2/19

G.R.No. 557
Applicant: Registered encl-02-19
Copies: 10
No of Pages: 05 Page
Service to: 04
Urgent Fee: 200/-
Total Fee: 200/-
Copy ready for delivery: 12-02-19
Copy delivred on: 12-02-19
Signature of Examinor: [Signature]
12-02-19

Controlled by the Court
Examination
12-02-19
[Signature]

بعدالت کروٹ 36 ٹریبونل جج بھگوان خواہ شاہ



2 پنجاب ایڈووکیٹ
عسقی الرحمن بنام حکومت

کروس اپیل

موزخہ
مقدمہ
دعوی
جزم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام ~~کروس ٹریبونل~~ کیلئے ~~سکریٹری اٹم جج بھگوان خواہ شاہ~~ کے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب دوصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالثہ فیصلہ بر حلقہ دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانشہ التوائے مقدمہ کے سبب ہے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

عسقی الرحمن وکلاء عسقی

المرقوم _____ ماہ _____ 20

واہ العب _____

کے لئے منظور ہے۔

کروس ٹریبونل

مقام

Accepted

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

Service Appeal No: 1165/2019

Atiq Ur Rehman SST B-16 (M) District Lakki Marwat.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.....Respondents

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

Respectfully Sheweth:-

The Respondents No.1-3 submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That the instant Service Appeal is not maintainable in its present form.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.
- 12 That the Appellant is not competent to file the instant appeal against the Respondents.

- 13 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 31/01/2008, hence, got finality.
- 14 That the appellant is not entitled for the grant of promotion w.e.f 18/07/2017 against the SS IT B-17 post in the Respondent Department.
- 15 That the Notification dated 24/07/2017 is not applicable upon the case of the appellant.
- 16 That the no rules/service structure has yet been framed for the promotion against the SS IT B-17 post in the Respondent Department till date.

ON FACTS.

- 1 That Para-1 needs no comments being relates to the academic/professional qualification & service record against the SST B-16 post inducted vide Notification dated 13-04-2018 & a copy whereof is **Ann- A**.
- 2 That Para-2 is also needs no comments as each & every civil Servant is liable to serve his parent Department with his utmost devotion for the salary he has drawing from the Govt. Treasury.
- 3 That Para-3 is incorrect & denied as perusal of the Notification dated 24-07-2014 with reference to the serial No.01 would show that for the promotion against the SS B-16 post the prescribed qualification is MA/M.Sc at least in 2nd Division with B.Ed/M.Ed from dully recognized university of the country at a ratio of 50% by promotion on the basis of seniority com fitness basis with qualifying service of five years in the Respondent Department & copies whereof are attached as **Ann-B & C**.
- 4 That Para-4 is correct on the grounds that a meeting was held on 10/07/2017 wherein it has been proposed that 50% quota may be reserved for SSTs (G/S) B-16 for promotion as SS (IT) B-17 with the above said qualification & criteria, however, the same rules/proposals have not been inserted in the service rules of the year of 2019 by the Respondent Department till date, hence the appellant, in the absence of formal service rules for promotion as SS (IT) B-17 cannot be promoted in the Respondent Department.
- 5 That Para-5 is incorrect & denied that the act of the Respondent Department with regard to the non-grant of promotion as SS (IT) B-17 is within legal sphere as no formal rules have been notified till date for the said post by the Respondent Department, hence , the plea of the appellant is baseless & liable to the rejected
- 6 That Para-6 is incorrect & denied as detail reply to this para has already being given in the above mentioned paras of the present reply, hence , needs no further comments.

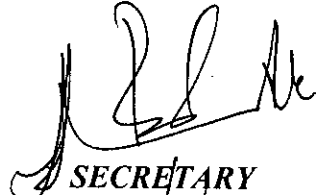
- 7 That Para -7 is correct to the extent of dismissal of his writ petition No. 877-D/2018 Abdul Ahad etc VS Govt. Aby the Honorable Peshawar High Court Peshawar vide judgment dated 30/01/2019 on merits of the case & a copy whereof is attached as **Ann-D**.
- 8 That Para-8 is needs no comments, however, the Respondents further submit on the following grounds inter alia:-


GROUND.

- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy by the Respondent Department in the instant case, hence, the stand of the appellant is baseless & liable to be rejected as the Notification dated 24/07/2014 & minutes dated 10/08/2017 are not applicable upon the case of the appellant.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy by the Respondent Department in the instance case, hence, the stand of the appellant is baseless & liable to be rejected.
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents.
- D **Incorrect & not admitted.** The stance of the appellant is without any cogent reason & legal justification & liable to be rejected with the submission that the act of the Respondents with regard to the non-grant of promotion against the SS (IT) B-17 post is legally competent on the grounds that the appellant does not meet the criteria for promotion as SS (IT) B-17 post in the respondent Department under the rules.
- E **Incorrect & not admitted.** The stance of the appellant is without any legal force & justification as proper explanation has been given in the above mentioned paras in the present reply.
- F **legal.** However, the Respondents No.1-3 also seek leave of this Honorable Tribunal to submit additional grounds, case law and record at the time of arguments on the date fixed before this Honorable Bench.

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

Dated: ___/___/2020.


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


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

AFFIDAVIT

I, Hayat Khan Asstt: Director (Lit: II) E&SE Department Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm and declare on oath that the contents of the instant Parawise Comments in the titled are true & correct to the best of my knowledge & belief.


FD Deponent

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19

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PIE No. 091-9225339, 9225344.
Fax: 091-9225343
Email: khattakfarid@gmail.com



NOTIFICATION

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) and in pursuance of the Govt. of Khyber Pakhtunkhwa Notification No. SO(S/F) E&SED/3-2/2018/SITT/Contract, Dated: 16-02-2018, the Services of the following Secondary School Teachers (SST Bio/Chem), (SST Maths /Physics), (SST General) appointed on Adhoc /Contract basis, are hereby regularized in RPS-16, on the SST posts in Teaching Cadre on the terms and conditions given below with effect from the date of their appointments.

SST (Bio/ Chem) 2014

Sr.	Name	Address	Score	Name of School	Appointment order No and dated	Extension order No and dated if any
	Imdad Khan	Mohalla Landi Shah Lower Village And Post Office Darara CNIC No.15701-5066509-3	123.58	GHS Ganari	2068-75 dated 30-03-2014	2013-20 dated 28-01-2017
	Wahed Ishaq	Village Kharat Dahan Post Office Shekhor Tehsil Tangi District Charsadda CNIC No 17102-5090551-3	128.82	GHS Mirza Darg	-do-	-do-
	Imam Rahim	Village And Post Office Akhaz Mohallah Dak District Dir Upper CNIC No 15701-8528496-0	127.77	GHS Sankoor	-do-	-do-
	Muhammad Karam	Village Osmani Tehsil And Post Office Wari District Upper Dir CNIC No 15702-0908885-7	126.79	GHS Pechu Kalzi	-do-	-do-
	Basim	Village And Post Office Chahbazan District Dir Upper CNIC No 15701-0482977-7	125.92	GHS Secural	-do-	-do-
	Lahif Ali Wabgan	Village Manohanda Post Office Bijnwar Dist And Tehsil Dir Upper CNIC No 15701-5420619-7	124.04	GHS Gaudigar	-do-	-do-

2017

Sr.	Roll No	Name	Permanent Address	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
	010100282	Batalshah Hassani	Village Shoukand Po Wari Teh Wandi District Upper Dir CNIC No.15702-8905909-2	141.72	GHS Nohay	1828-84 dated 28-01-2017	NA
	010100281	Umar Nasir	Village Dural Post Office Sankoor District Tehsil Upper Dir	133.79	GHS Usheri	-do-	NA

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			CNIC No.15701-8303080-5				
9	791000100	Ishfaq Ahmad	Village Qasimabad, Osrai Tehsil And Post Office Wari District Dir Lower CNIC No.15702-7112478-5	122.16	GHS Malangu	-do-	NA
10	7910001080	Sharif Ullah	Village Motor Muhallah Chahal Post Office And Tehsil Wari District Upper Dir CNIC No.15702-3040810-9	130.23	GHS Jatgram	-do-	NA
11	791000125	Abdul Haseeb	Village Wari Pajean Tehsil And Post Office Wari District Upper Dir CNIC No.15702-1418500-0	129.49	GHS Wari	-do-	NA
12	791000071	Muhammad Ajmal Khan	Village Wari Post Office And Tehsil Wari District Upper Dir CNIC No.15702-6862524-1	127.32	GHS Wari	-do-	NA
13	791000163	Hamid Zia	Village Jelar Post Office Wari Tehsil Wari District Dir Upper CNIC No.15702-8726858-9	127.29	GHS Jelar	-do-	NA
14	451001101	Muhammad Shuaib	Fauji Abad Post Office Bagai Tehsil And District Mandan CNIC No.16101-0989245-7	126.36	GHS Gamspeer	-do-	NA
15	791000062	Nasir Ahmad	Almad Public School And College Wari Dist Upper Dir CNIC No.15702-6020380-1	136.26	GHS SS Khel	-do-	NA
16	601000078	Ferman Ali	Aghori Colony Street #2 House No.279 Tub Well Chok Peshawar City NCIC# 12301-5086997-9	126.0	GHS Nehaq	-do-	NA
17	791000089	Muhammad Shahab	Village And Post Office Barawal Bandi District Dir Upper CNIC No.15704-9700667-7	125.21	GHS Choukya ran	2983-89 dated 17-05-2017	NA
18	791000187	Khaista Rahman	Village Nagrail Post Office Sahib Abad Tehsil Wari Dir Upper CNIC No.15702-6938866-3	124.82	GHS Barawal Bandh	4678-89 dated 28-04-2017	NA
19	791000076	Faizan Ullah	Village Cham, P/O Sheringal District Dir Upper CNIC No.15701-4715187-7	124.62	GHS Partrak	-do-	NA
20	791000064	Baqshah Sardar	District And Tehsil Upper Dir Post Office Bibyanar Village, Kair District Upper Dir CNIC No.15701-2019422-7	123.62	GCMHS Dir	-do-	NA
21	791000058	Lal Rehman	Village Bibyanar Dir Upper CNIC# 15701-5401292-7	123.59	GHS Ushorai	2937-43 dated 31-07-2017	NA
22	791000153	Yassar Khan	Village & PO Tehsil Wari District Dir Upper CNIC# 15702-5950950-3	123.10	GHS Partrak	-do-	NA

SST Maths Physics 2014

Sr.	Name	Address	Score	Name of School	Appointmnet order No and dated	Extension order No and dated if any
1	Qasim Khan	Village Qashgari Pn Dir Upper District Lower Dir CNIC No.15701-5704321-1	102.4	GHS Bui Bui	2082-01 dated 30-08-2014	2073-20 dated 28-01-2017
2	Shoaib	Muhallah Chumra Kattan Pajean Post Office Darani Upper Dir CNIC No.15701-6001825-1	101.05	GHS Ushorai	-do-	-do-

Dir Upper Male SSTs Regularization order-2018

2015

Sr#	RollNo	Name	Address	Total Marks (out of 200)	School/remarks	Appointment order No and dated	Extension order No and dated if any
	7920001	Muhammad Nazeem Khan	Village Darara District Dir Upper CNIC No. 15701-6291363-9	133.1	GHS Chaklota	3987-93 dated 30-11-2015	3987-93 dated 30-11-2015
	7920043	Ali Akbar Khan	District Upper Dir Tehsil Dir De Darara Mohallah Shari Abad District Upper Dir CNIC No. 15701-9078917-3	127.91	GHS Bela	-do-	-do-
	7920025	Anwar Ullah	Village Umrolai Pajeen Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-9888829-9	127.8	GHS Sparko	-do-	-do-
	7920059	Jurran Khan	Village, Tehsil Wari District Dir Upper CNIC No. 15702-3282956-3	123.56	GHS Gandig ar	-do-	-do-
	7920039	Muhammad Ishfaq	Village Seratan District Dir Upper CNIC No. 15701-7267964-5	118.43	GHS Ganshal	-do-	-do-

2017

Sr#	RollNo	Name	Permanent Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
8	7920000-80	Altaj Ur Rahman	Village Jabar Post Office, Gamsaar Tehsil Dir District Dir Upper CNIC No. 15701-1222932-9	136.82	GHS Gamsaar	4578-84 dated 28-04-2017	NA
9	7920000-51	Uniar Farooq	Village Hichkhal Post Office Chaklota Tehsil And Dir And District Dir Upper CNIC No. 15701-9826695-7	131.93	GEMHS Dir	-do-	NA
10	8920000-97	Fazal Wahid	The Home Of Knowledge School And College Wari Upper Dir CNIC No. 15702-6291364-5	124.79	GHS SS Khel	-do-	NA
11	7920006-39	Shuja Ur Rehman	Vill. Suldag Post Office Sherinag District Dir (U) CNIC No. 15701-6612291-7	124.22	GHS Deputy (P)	-do-	NA
12	7920001-59	Shah Abdul Aziz	Vill. Tangai Teh. And Post Office CNIC No. 15702-2406118-0	122.26	GHS Jutgram	-do-	NA
13	7920001-12	Aftab Ullah	Village Batul Usheri Darra District And Tehsil Upper Dir CNIC No. 15701-8457716-9	121.04	GHS Barawal Bandi	-do-	NA
14	7920001-86	Muhammad Tariq	Suati Collegiate School And College, Khuzda Khela Suati CNIC No. 17101-3201792-3	120.31	GHS Nohar	-do-	NA
15	7920000-79	Zia Ullah	The Crescent Moon School Wari Upper Dir CNIC No. 15702-4694431-1	120.23	GHS Wari	4004-10 dated 24-09-2017	NA
16	7920000-94	Ihsan Ullah Khan	Village Kakul Tie And Post Office Wari District Dir Upper CNIC No. 15702-6601145-9	118.99	GHS Wari	3357-61 dated 19-10-2017	NA
17	4520005-91	Muhammad Waseem	Village Baskhal Pa Usher Tehsil Dir District Upper Dir CNIC No. 15701-0402661-7	118.91	GHS Patrak	4878-84 dated 28-03-2015	NA
18	7920001-02	Zafer Khan	Village Begani P/O And Teh Wari CNIC No. 15702-1522805-5	117.99	GHS Bandai (P)	-do-	NA
19	8920002-94	Masih Ullah	Village Sudiq Baida, P/O Akhans Tehsil And District Upper Dir	117.80	GHS Darara	-do-	NA

Dir Upper Middle SSTs Regularization order-2018

20	70200000	Muhammad U Ishaq	CNIC No. 15702-21062285-1 Village Union Kot Tehsil And Post Office Wari Dist Dir Upper	117.37	GHS Jalar	-do-	NA
21	70200000	Hassan Ull Din	CNIC No. 15702-2106235-1 Village Kakin Pajera Post Office Dargah Dir Upper CNIC No. 15702-2106235-3	117.66	GHSS Patrak	-do-	NA
22	60200005	Muhammad Anwar	Room Number 54 Hostel Number 03 Quaid E Azam University Of Islamabad CNIC No. 15701-2106412-1	115.68	GHS Jalar	-do-	NA
23	70200000	Sulafa Ahmad	Mohallah Bareham Village Jalar Post Office Cansuar Upper Dir CNIC No. 15701-2106299-9	115.58	GHSS Usheri	-do-	NA
24	70200001	Haman Ullah	Department Of Agriculture Extension Dist Dir Lower CNIC No. 15701-1109727-6	115.52	GHS Kair Darra	-do-	NA
25	70200000	Syed Fazal Ghani	Vill & P/O Gohari Teh And Dist Upper Dir CNIC No. 15701-2106235-9	115.05	GHSS Barawal Randi	-do-	NA
26	70200000	Abdullah	Village Dulla Post Office Akhgram Tehsil Wari Dir Upper CNIC No. 15702-2106296-5	113.92	GHSS Wari	-do-	NA
27	70200000	Maqbool Ali	Village And Post Office Wari Dir Upper CNIC No. 15702-2106296-3	102.88	GHS Hayagay (Sh)	-do-	NA

(SST General) 2014

Sr	Name	Address	Score	Name of School	Appointment order No and dated	Extension order No and dated if any
1	Muhammad Yaseen	Jamia Damania, Usmania Colony, Nethia Road Peshawar Cantt, Peshawar CNIC No. 15701-2106272-3	120.97	GHS Kair Dara	2084-91 dated 30-04-2014	2913-20 dated 28-07-2017
2	Jumra	Narai Wala New Model Colony Post Office And Tehsil Takht Bhari CNIC No. 15701-2106246-0	136.69	GHS Duro	-do-	-do-
3	Sadail	Village Rehankot Tehsil And Post Office Dir District Upper Dir CNIC No. 15701-6021667-5	135.98	GMS Dohanda	-do-	-do-
4	Hazem Said	Village Thail, Mohallah Haji Shah Tehsil And Post Office Karkot CNIC No. 15702-2106245B-3	133.16	GMS Sundri	-do-	-do-
5	Shakeel Khan	Village Gohari Post Office And Tehsil Wari District Dir Upper CNIC No. 15702-2106246A-9	132.12	GHS Shinkari	-do-	-do-
6	Shaukat Ishaq	House No 157 Sector D/1 Mirpur Aje CNIC No. 15702-2106297-7	131.19	GHS Basha	-do-	-do-
7	Abulhasanad Yasar	C/O Zakir, Photoshite Main Bazar Dir Post Office Dir Tehsil Dir CNIC No. 15701-2106248A-3	131.03	GMS Bifanzai	-do-	-do-
8	Hassan Ullah	House No 114 Near Bilal Masjid Bilal Lane Arbab Road-University Of The Peshawar CNIC No. 15702-2106214-5	129.48	GHS Seri Sultan Khail	-do-	-do-
9	Muhammad Ishaq	District Tehsil Post Office Dir Upper Main Bazaar Dir Upper Changan Center CNIC No. 15701-2106215-5	129.08	GHS Rukhan	-do-	-do-
10	Hassan Ullah	15702-2106210A-1 CNIC No. 15702-2106210A-1	127.5	GHS Janbatti	-do-	-do-
11	Muhammad Ullah	Village Beyar Kohistan District Dir Upper	126.19	GHS Badarkani	-do-	-do-

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Dir Upper Male SSTs Regularization order-2018

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	CNIC No. 15703-8630529-7				
12	Zohr Ellyah	P/O Wari Tehsil Wari Village Wari Poonch Malappuram	126.03	GHS Bandan Osori	-do-

2015

Sr	Roll No	Name	Address	Academic Marks (out of 100)	School/remarks	Appointment order No and dated	Extension order No and dated if any
13	7930066	Hazrat Wahab	Village Memo Bando Post Office Bibiyawar Tehsil And District Dir Upper CNIC No. 15701-8164289-3	64	GMS Sazan	-do-	-do-
14	7930362	Abdullah	Maholah Qasmani Village Kotan Poyeen Post Office Dagonar Tehsil Upper Dir District Upper Dir CNIC No. 15701-5206092-9	55.47	GHS Bela	-do-	-do-

2017

Sr	Roll No	Name	Permanent Address	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
15	793000435	Shaukat Ali	Village Goyal Mohallah Goyal Colony Tehsil And Post Office Wari CNIC No. 15702-3434680-5	153.45	GMS Gondar	2878-84 dated 28-04-2017	NA
16	793000383	Muhtaseb Ullah	Post Office Box Tehsil Sarawal Banda District Dir Upper Mohallah Bangloy Cham CNIC No. 15704-0281840-5	139.41	GMS Nusrat	-do-	NA
17	793000193	Fazal Hayat	Vill Jangram Post Office Wari Tehsil Wari District Dir Upper Kpk CNIC No. 15702-6126067-7	139.30	GHS Karkabanj	-do-	NA
18	793000442	Hazrat Younas	Hazrat Younas S/O Shah Azeal Khan Village Goyal Post Office Tehsil Wari District Dir Upper CNIC No. 15702-4620882-9	137.47	GHS Jelar	-do-	NA
19	793000724	Abdul Wahid	Village Haji Shah Tehsil P/O Kalkar Kir Upper Kpk CNIC No. 15703-4832268-9	137.03	GHS Patrak	-do-	NA
20	793000078	Irfan Ullah	Vill Bando Teh And P/O Wari Dist Upper Dir CNIC No. 15702-6290918-5	136.72	GMS Shaltafa	-do-	NA
21	793000227	Faiz Ul Alam	Village And Post Office Sheringal Dist Dir Upper CNIC No. 15701-8953330-4	136.05	GMS Daag (B)	-do-	NA
22	793000011	Kaleem Ullah	Village P/O Sahib Abad District Dir Upper CNIC No. 15702-2305643-9	135.88	GHS Bajay	5057-03 dated 24-05-2017	NA

TERMS & CONDITIONS:

The regularization will not be in favour of those, who have not taken over charge OR has remained absent from duty OR resigned from service and also not for those who are under disciplinary proceedings.

12/31/18
 Deputy Director (Esatb)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

[Signature]

1. Accountant General Khyber Pakhtunkhwa Peshawar
 2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar
 3. District Education Officer (Male) Dir Upper
 4. District Accounts Officer Dir Upper
 5. Official Concerned
 6. PS to the Secretary to Govt Khyber Pakhtunkhwa T&SS Department
 7. PS to the Director T&SS Khyber Pakhtunkhwa Peshawar
 8. M/PS

1/ File No. 25/A-14/SST/Adhoc/Appnt Dated Peshawar the 13/4/2018
 Copy forwarded for information and necessary action to the
 Director
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

2969-75

(Farid Ahmad Khattak)

2. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Posting and Transfer of Teachers, Lecturers and Professors) Regulatory Act, 2011 and such rules and regulations as may be issued from time to time by the Government.

3. Their pay shall be released subject to the verification of academic and professional documents/ testimonials from the concerned boards/universities by the District Education Officers Concerned.

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

5. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.

6. They shall possess the same qualification and experience required for the subject post on regular basis.

7. Their regularization shall not affect the promotion quota of the existing holders of posts in respective service cadre. They shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regulation of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service 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.

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

Dir Upper Male SST's Regularization order-2018

0.0.2



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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Peshawar, dated the 24th July, 2014.



NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

1	2	3	4	5
1A	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

(1)



**UNIVERSITY OF MALAKAND
PAKISTAN**

DETAILED MARKS CERTIFICATE

Department of Computer Science & IT

Session (2007-2011)

Name: **Muhib Ullah**

F/Name: **Akbar Said Khan**

Reg. No: **20070010010**

BS (4-year) in Computer Science

Subjects	Maximum Marks	Credit Hours	Marks Obtained			
			Internal	Theory	Practical	Total
English Comprehension	50	3		21		21
Islamiyat	50	2		36		36
Physics	100	3	16	46		62
Fundamentals of Computers	100	3	17	50	20	87
Calculus-I	100	3	17	63		80
1st Term Examination March 2008 Roll No: 110		Total Marks: 400		Result Date: May 19, 2008		Obtained Marks: 286
Programming Concepts	100	4	20	51	20	91
Discrete Mathematics	100	4	18	62		80
Mathematics-II	100	4	14	67		81
Electronics	100	3	19	67		86
2nd Term Examination August 2008 Roll No: 209		Total Marks: 400		Result Date: Oct 21, 2008		Obtained Marks: 338
Pakistan Studies	50	2		31		31
Business Communication	50	3		36		36
Object Oriented Programming	100	4	17	50	18	85
Data Structures	100	4	18	51	18	87
Digital Logic Computer Design	100	4	15	72		87
3rd Term Examination March-April 2009 Roll No: 309		Total Marks: 400		Result Date: Aug 20, 2009		Obtained Marks: 326
Database-I	100	4	17	41	16	74
Computer Organization & Assembly Language	100	4	17	45	18	80
Programming Language-I (Visual C++)	100	4	18	51	18	87
Operating System	100	4	18	52	18	88
Statistics and Probability	100	3	18	73		91
4th Term Examination Oct-Nov 2009 Roll No: 409		Total Marks: 500		Result Date: Jan 12, 2010		Obtained Marks: 420
Artificial Intelligence	100	4	18	50	17	85
Data Communication & Networks	100	4	18	51	18	87
Software Engineering-I	100	4	18	53	19	90
Programming Language-II (Java)	100	4	20	53	20	93
5th Term Examination April-May 2010 Roll No: 509		Total Marks: 400		Result Date: Jun 30, 2010		Obtained Marks: 355
Network Strategies	100	4	17	47	18	82
Numerical Analysis	100	4	20	48		68
Database-II	100	4	17	48	19	84
Computer Architecture	100	4	17	49	18	84
Automata Theory	100	3	18	53	16	87
6th Term Examination Sep-Oct 2010 Roll No: 619		Total Marks: 500		Result Date: Dec 13, 2010		Obtained Marks: 405
E-Commerce Application and Technology	100	3	16	49	17	82
Software Engineering-II	100	4	19	52	17	88
Computer Graphics	100	3	20	53	17	90
Network Security	100	3	17	53	18	88
Web Programming	100	4	20	53	18	91
Design & Analysis of Algorithms	100	3	20	57	20	97
7th Term Examination March 2011 Roll No: 1713		Total Marks: 600		Result Date: May 31, 2011		Obtained Marks: 536
Compilers	100	4	19	46	18	83
Software Project Management	100	3	19	47	18	84
Multimedia Technology	100	4	18	55	19	92
Research Thesis (Software Project)	100	6		93		93
8th Annual Examination Sept-Oct 2011 Roll No: 819		Total Marks: 400		Result Date: Dec 27, 2011		Obtained Marks: 352
Total Result Status:		Maximum Marks	3600	Obtained Marks		3018

Overall Percentage : 83.83 Total Credit Hours : 137

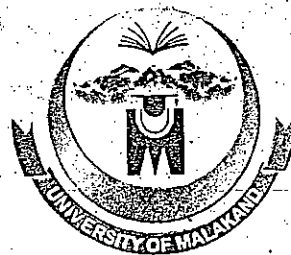
Errors and omissions are subject to subsequent rectification

Prepared by:

Checked by:

Controller of Examinations
University of Malakand

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Session 2007-2011

MUHIB ULLAH Son of AKBAR SAID KHAN Registration No. 20070010010 student of
 Department of Computer science & I.T University of Malakand having passed the
 prescribed examination held in Sept-Oct 2011 under Roll No. 819 is admitted to the degree of

BS (4-Year)

in Computer Science

in First Division

Controller of Examinations

Result Declared on 27-Dec-2011

Issuance Date 21-Mar-2012

Countersigned

M. Rasool
 Vice Chancellor

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DEPARTMENT OF COMPUTER SCIENCE & IT
UNIVERSITY OF MALAKAND
CHARDARA-DIR (Lower), KHYBER PAKHTUNKHWA



Student's Name	Muhib Ullah	Father's Name	Akbar Said Khan
Program/Session	M.Phil, 2012-2014	Registration No.	20070010010

M.Phil Course Work										
S.No.	Semester	Course Code	Course Title	Cr. Hrs.	Total Marks	Marks Obtained	Percentage	GP	GPA	Remarks
1	1st	CS 903	Research Methods in Computer Science	3	100	71	71	10.2	3.47	PROMOTED
2		CS 701	Advanced Operating System	3	100	65	65	9.0		
3		CS 913	Advanced Topics in Software Engineering	3	100	78	78	11.5		
4		CS 912	Empirical Software Engineering	3	100	75	75	10.9		
Sub-total				12	400	289	72.25	41.6		
5	2nd	CS 908	Theory of Computation	3	100	79	79	11.1	3.75	PROMOTED
6		CS 705	System Re-Engineering	3	100	75	75	10.5		
7		CS 704	Software Refactoring	3	100	86	86	12.0		
8		CS 702	Advanced Analysis of Algorithm	3	100	81	81	11.4		
Sub-total				12	400	321	80.25	45.0		
9	3rd & 4th	Research "MOBILE COMMERCE CUSTOMERS' RELATIONSHIPS MANAGEMENT MODEL"				Successfully Completed				

Over all results status	
Total Points	86.6
Total Cr. Hrs	30
CGPA	3.61

Countersigned by

 Controller of Examinations
 University of Malakand
 Dated: 26/11/18

MS/Ph.D. Coordinator

 Deptt. of
 University of Malakand

26-Apr-2018
 Chairman
 CHAIRMAN
 Department of CS & IT
 University of Malakand

Errors and Omissions are subject to subsequent rectification.
 Date of Issue: 04-04-2018

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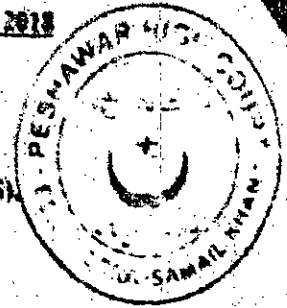
JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, D.J. KHAN BENCH
Social Department

Writ Petition No. 877-D with C.M. Nos. 1099-D & 1001-D of 2018

Abdul Ahad and 9 others

Versus

Govt. of Khyber Pakhtunkhwa through Secretary (E&S)
Peshawar and seven others



JUDGMENT

Date of hearing

30.01.2019

For petitioners:

Muhammad Anwar Awan Advocate

For respondents:

Mr. Kamran Hayat Miankhal, Addl:
A.G and Mr. Zia ur Rehman Qazi
Advocate

S.M. ATTIOUE SHAH, J.- Through the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioners Abdul Ahad and others have prayed that:-

"In wake of above submission it is respectfully prayed that on acceptance of this writ petition may kindly direct the respondent to collect the documents from SST (General/Science) for promotion as Subject Specialist (IT) and consider them according to rules. It is also further prayed that may kindly direct the respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist (IT) BS-17."

ATTENTION
23-2-2019
EXAMINOR
Peshawar High Court
D.J. Khan Bench

2. The petitioners are serving as Secondary School Teacher (General/Science) and seek issuance of writ

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directing the respondents to collect documents from SST (General/Science) for promotion as Subject Specialist (IT) and to consider them according to rules and further directions to respondents to amend or interpret the promotion rules by providing ample opportunity to SST (General/Science) as Subject Specialist. Admittedly, the petitioners are civil servants and the matter in question relates to the terms and conditions of their service and in such like cases this Court has no jurisdiction to issue directions for the promotion of petitioners or direction for amendment in the Rules in question. In this respect, reliance is placed on the cases of Province of Punjab, Communication and Works Department, Lahore. Vs. Liaquat Ali Bukhari (1998 PLC(CS) 901), Muhammad Zafar Ali. Vs. Federation of Pakistan through Secretary Establishment, Islamabad (2018 PLC(CS) 116) and Hafiz Muhammad Ilyas. Vs. Government of Khyber Pakhtunkhwa (2018 PLC(CS) N 40). The Honourable Supreme Court of Pakistan in the case of Government of Khyber Pakhtunkhwa. Vs. Hayat Hussain (2016 SCMR 1021) held that:-

"No vested right of a government employee was involved in the matter of promotion or the rules determining their eligibility or fitness. High Court had no jurisdiction by means of constitution petition to strike down such rules."

ATTESTED
 22-02
 EXAMINOR
 Jashwar High Co
 D.I. Khan &c

Thus, in view of above facts, it has conclusively been resolved that High Court has no jurisdiction to entertain matters relating to civil servants regarding terms and conditions of their service, or any ground whatsoever.

3. Accordingly, for the reasons stated above, this petition is not maintainable and is dismissed alongwith enlisted C.Ms and interests relief. However, the petitioners are at liberty to approach the competent forum for the redressal of their grievance, if so advised.

Announced
Dt. 30.01.2019
11:00 AM

JUDGE
JUDGE

(Dy)
Hon'ble Mr. Justice S.M. Anwar Shah
Hon'ble Mr. Justice Saeed Ahmad

off
h/v

G.R. No. 557
Applicant: Registered on 01-02-19
Copies: 05
No of Pages: 05
Copies: 05
Urgent Fee: 20/-
Total Fee: 20/-
Copy ready for entry: 12-02-19
Copy despatched on: 12-02-19
Signature of Examiner: [Signature]
12-02-19

Committed to the High Court
12-02-19
P. K. SINGH
Deputy Registrar
High Court, Guwahati
12-02-19

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



1. Abdul Ahad S/O Ghulam Muhammad S/O Ahmad
D.I.Khan currently working at GCHS no. D.I.Khan as SST (Physics & Mathematics).
2. Kalim Ullah S/O Rehmat Ullah Cas Baluch R/O Mohallah Ahmad Sath Eld
Gah D.I.Khan currently working as ASDEO SST (General) chudwan circle
District D.I.Khan.
3. Dr. M. Naseem Ullah S/O Fatch Ullah R/O Gillani Town near Wensum College
D.I.Khan Currently posted at GHS Haji Mora as SST (General), (Phd).
4. Ghulam Abbas S/O Ghulam Qasim R/O Village Mialy Tehsil Parova D.I.Khan
currently posted at GHS Mangal SST (General).
5. Abdul Ghafoor S/O Ghulam Nabi Khan R/O Village Lunda Para Tehsil Parova
D.I.Khan currently posted as GHS Wanda Sheru D.I.Khan SST (General).
6. Muhammad Imran S/O Haji Ismail R/O Parova D.I.Khan currently posted at
GMS Malsikhi SST (General).
7. Muhammad Bilal S/O Malik Muhammad Amir R/O Currently posted at GHS
SST (General) Gara Rahid D.I.Khan.
8. Rafi Ullah S/O Hameed Ullah R/O Kot Navuz District Tank, currently working
as ASDEO Education Office Tank SST (General).
9. Asmat Ullah S/O Rahmat Ullah R/O Shadi Khel Village Daraki District Tank
SST (General).
10. Muhammad Farooq S/O Rahim Baksh R/O Village Chah Khan Wala Tehsil
Parova D.I.Khan currently posted at GHS Parova as SST (Physics &
Mathematics).

VERSUS

ATTESTED
18-03
EXAMINOR
Peshawar High Court
D.I.Khan Bench

1. Govt of Khyber Pakhtunkhwa through Secretary (E&S) Education Peshawar.
2. Govt of Khyber Pakhtunkhwa through Secretary Establishment Department Peshawar.
3. Govt of Khyber Pakhtunkhwa through Secretary Finance Department Peshawar.
4. Govt of Khyber Pakhtunkhwa through Secretary Law Peshawar.
5. Director General (E&S) Education Khyber Pakhtunkhwa Peshawar.
6. Deputy Director EMIS (S&SK) Department Khyber Pakhtunkhwa Peshawar.
7. District Education Officer (Male) D.I.Khan.
8. District Account Officer D.I.Khan.

**PETITION UNDER ARTICLE 199 OF CONSTITUTION
OF THE ISLAMIC REPUBLIC OF PAKISTAN, 1973.**

Respectfully Sheweth:

The facts leading rise to present writ petition in brief are:

1. That petitioner having degree of Bachelor of Science, appointed as Secondary School Teacher (General/Science). Copy of academic qualifications and notifications are annexure A & B.
2. That petitioner also acquired the degree of Master of Computer Science. Copy of Certificates is annexure C.
3. That respondent vide notification no. SO (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th of July 2014 approved some amendments regarding promotion of Secondary School Teacher BPS-16 to subject specialist BPS-17, according to which 50% promotion should be made on the basis of seniority cum fitness for the relevant subject amongst the SST with at least 5 year service along with 2nd class Master Degree or 4 year BS degree in the relevant subject. Copy of Notification is Annexure D.
4. That after the amendments some promotions were made but Secondary School Teacher (General/Science) were ignored reason best known to the respondents. In the

11/05/14
 13-02-19
 EXAMINOR
 Peshawar High Court
 D.I.Khan District

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

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective column namely

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths-"A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on basis of seniority-cum-fitness, from the district concerned in the following manner</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher as having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion on the basis of seniority-cum-fitness from amongst Certified Teachers, with at least five years service as such as having qualification mentioned in column No.3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters (BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters as having qualification mentioned in column No.3:</p>

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

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

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

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

(27/1/80)

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

(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

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

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

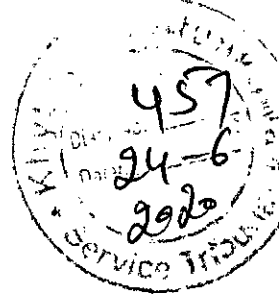
SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst: of even No & date:

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


ZAMIN KHAN MOMAN
SECTION OFFICER (PRIMARY)

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



C.M No. _____/2020

In

Service Appeal No. ~~118~~/2019

Atiq UR Rehman.....Petitioner

Vs

Govt of KPK & Others.....Respondents

Subject:- **APPLICATION FOR EARLY HEARING IN THE
CAPTIONED CASE ALONG WITH CONNECTED
PETITIONS.**

Respectfully Sheweth:-

The petitioner humbly submits as under:-

- 1- That the captioned connected Service Appeals is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the respondents issued notification dated 08.06.2020, and it is very necessary to restrain them from acting upon the same, that's why the petitioners preferred stay applications in the same.
- 3- That the date given is too late and the petitioner request this Hon'ble Tribunal that as such the noted date may please be expedited and be fixed at earliest.

It is therefore, respectfully prayed that on acceptance of this application the above titled case may kindly be fixed at earliest to meet the ends of justice.

*Shall remain posted
to the date already fixed.*

Through

Petitioners

Saadat Ullah Khan Tangi
Advocate High Court
Peshawar
Cell#0331-5030566

Dated:-23.06.2020

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BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR



C.M No. _____/2020

In

Service Appeal No. _____/_____

Atiq Ur Rehman.....Petitioner

Vs

Govt of KPK & Others.....Respondents

Subject:- **APPLICATION FOR SUSPENSION OF NOTIFICATION**
NO.332-52 SS (IT) PROMOTION DATED PESHAWAR
THE 08/06/2020, TILL THE FINAL DISPOSAL OF THE
SERVICE APPEAL.

*Put up the court
Sondh
18/6/20*

Respectfully Sheweth:-

Reader

The petitioner humbly submits as under:-

- 1- That the captioned Service Appeal is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the Directorate of E&SE KPK issued notification No.332-52 SS (IT) Promotion dated Peshawar the 08.06.2020 inviting application/documents for Promotion of SST (IT) BS-16 to SS (IT) BS-17 Regular. (**Attested Copy of Notification is attached as Annexure "A"**).
- 3- That vide the said notification, the respondents intends to deprive the petitioner from his valuable rights of promotion, that's why the petitioner seeks indulgence of this Hon'ble Court for restraining the respondents from acting upon the same till the final disposal of the Service Appeal on the following grounds inter alia.

GROUND:-

- A- That the impugned notification is against the law on the point and violative of fundamental rights of the petitioner as well as against promotion Rules 2014 & Minutes of SSRC dated 10.08.2017.

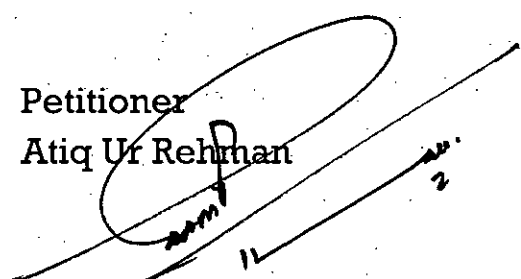
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B- That the petitioner has good prima facie case, Balance of Convenience lies in favour of petitioner & if impugned notification is not suspended the petitioner would face irreparable loss as the petitioner is discriminated in the matter.

It is, therefore, prayed that on acceptance of the instant application, notification impugned above may kindly be suspended till final disposal of the main service appeal.

Through

Petitioner
Atiq Ur Rehman


Saadat Ullah Khan Tangi
Advocate High Court
Peshawar
Cell#0331-5030566

Dated:-15.06.2020

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

C.M No. _____/2020

In

Service Appeal No. _____/_____

Atiq Ur Rehman.....Petitioner

Vs

Govt of KPK & Others.....Respondents

AFFIDAVIT

I, Attiq Ur Rehman S/O Amir Hamza (Petitioner), do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT

CNIC#11201-2038060-7

Cell# 0334-8816032

Identified by

Saadat Ullah Khan Tangi

Advocate High Court

Peshawar



Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa

No. 339-12 SS (IT) Promotions

Dated Peshawar the: 8/6/2020

To

1. All the District Education Officers (Male) Khyber Pakhtunkhwa
2. All the District Education Officers (Male) Newly Merged District in Khyber Pakhtunkhwa

Subject: -SUBMISSION OF APPLICATION/DOCUMENTS FOR PROMOTION OF
SST (IT) BS-16 TO THE POST OF SS (IT) BS-17 REGULAR

Memo:

I am directed to refer to the subject cited above and to state that the Elementary & Secondary Education (E&SE) Khyber Pakhtunkhwa intends the promotions of SSTs(IT) (Male) BS-16 to the post of Subject Specialist (SS-IT) BS-17 (Regular), hence you are directed to inform the SSTs (IT) concerned having regular appointments up to 2014 against SST (IT) post in your respective districts to provide the applications alongwith relevant documents as per detail given below for the purpose of promotions to SS (IT) post on the following format.

S#	Sen#	Name	Qual:	Div in master	Prof: Qual:	DOB	Domicile	DO 1 st appt	DO of appt as regular	Contact#	Remarks if any

Note: - the relevant documents will be consisting of:

1. Bio Data/CNIC
2. 1st App: order/Contract Order
3. Regular App: as SST IT BS-16
4. Service Certificate
5. Non involvement certificate (duly countersigned by DEO)
6. Last 5 Years results
7. Pay slip
8. synopsis
9. ACRs (from 1st app: till 2019) Synopsis / ACRs should be submitted in separate file and documents in separate file, ACR and synopsis should be handed over with the conveying letter from concerned D.E.O to ACR brach.
10. All certificate/degrees with DMCs (duly attested)
11. Domicile
12. Information as per format referred to the above may be provided in hard.
13. Applications/Documents/ information should be reached to this directorate within (10) days after the issuance of this letter.
14. Candidates having 3rd division in Mater are not eligible.

DEPUTY DIRECTOR (ESTAB)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa

8/6/2020

Endst.No. _____ Dated _____/2020

Copy of the above is forwarded to the:-

1. PA to Secretary to Govt: E& SE Deptt Khyber Pakhtunkhwa
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar

DEPUTY DIRECTOR (ESTAB)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa