



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
Peshawari**


(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)

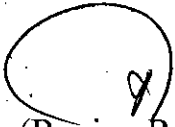
*KaleemUllah

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)

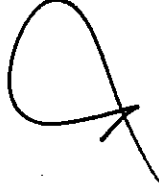

(Rozina Rehman)
Member (J)

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.

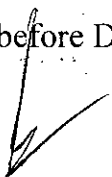

(Rozina Rehman)
Member (Judicial)

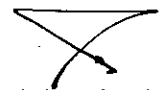

(Kalim Arshad Khan)
Chairman

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)

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

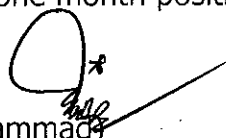
Due to summer vacation, case is adjourned to 17.3.2021 for the same as before.


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

19.5.21


Due to COVID 19, the case is adjourned to 10.9.21 for the same.

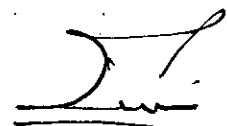

Reader

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.

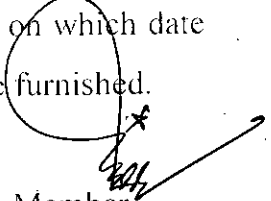


Reader

04.03.2020

Junior to counsel for the appellant and Addl. AG for the respondents present

Learned AAG seeks time to contact the respondents and submit written reply. Adjourned to 13.04.2020 on which date the requisite reply/comments shall positively be furnished.


Member

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.

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.

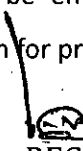



Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1169/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2019	<p>The appeal of Mr. Muhammad Imran 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> 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> 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> Chairman</p>

The appeal of Mr. Muhammad Imran SST GMS Maliki D.I.Khan received today i.e. on 29.07.2019 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15.days.

- 1- Memorandum of appeal may be got singed by the appellatant.
- 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 the memo of appeal is not attached with the appeal which may be placed on it.
- 5- The authority to whom the departmental appeal was made/preferred has not been arrayed a party.
- 6- Necessary party may be made in the heading of the appeal.

No. 1346 /S.T,

Dt. 31-7- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadatullah Khan Tangi Adv. Pesh.

Re-Submitted after completion 18-08-2019

Objection no.4 is still stand therefore, the appeal in hand is returned again to the counsel for the appellatant for completion and resubmission within 15 days.

No. 1480 /S.T,

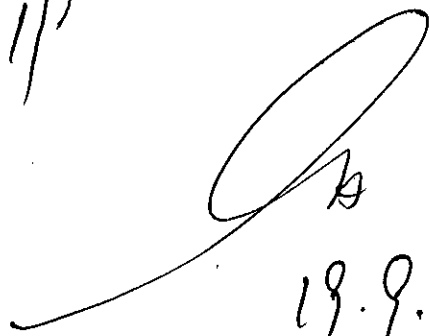
Dt. 23/8 /2019.


REGISTRAR

Mr.Saadatullah Khan Adv. Pesh.

Sir, Copy of Regularization order is Available.
Re-Submitted after Completion

The same may kindly be checked with
with case title "Chalam Abbas vs Govt"
fixed for 30.9.19


19.9.19

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 1169/2019

Muhammad Imran.....**Appellant**

Versus

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

INDEX

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of parties		7
4.	Copy of Appointment Letter	A	8-22
5.	Copy of Notification dt.24.07.2014	B	23-28
6.	Copy of minutes of the meeting	C	29-31
7.	Copies of departmental Appeal and Writ Petition	D & E	32-37
8.	Wakalatnama		38

Appellant

Through


Saadaf 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

Muhammad Imran S/o Haji Ismail,
Appointed as SST, GMS Malikhi,
District Dera Ismail Khan.....**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 31.07.2017. (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").

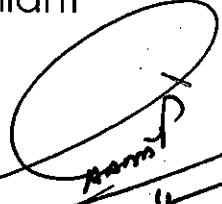
5. That the respondent in utter violation of the notification, and minutes of the meeting as aforesaid is making promotions from SSTs (General/Science) but to utter violation are not considering the appellant for the promotion to the post of S.S(IT).
6. That the respondent is bent upon not to insert 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.

Appellant
Through



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

Muhammad Imran.....**Appellant**

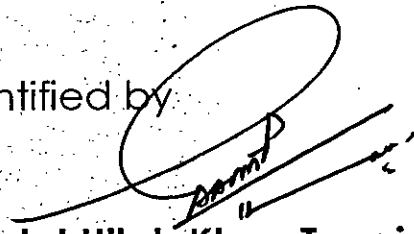
Versus

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

AFFIDAVIT

I, Muhammad Imran S/o Haji Ismail, Appointed as SST, GMS Malikhi, District Dera Ismail Khan, 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#:

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Muhammad Imran.....**Appellant**

Versus

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

ADDRESSES OF PARTIES

APPELLANT:

Muhammad Imran S/o Haji Ismail,
Appointed as SST, GMS Malikhi,
District Dera Ismail Khan.

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

Through

Appellant


Saadat Ullah Khan Tangi
Advocate High Court

Dated 18.07:2019

DIKhan Male Regularization order-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/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 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 #	Roll No	Name	Domicile	Total Marks [Out of 200] J=H+I	School where posted	Appointment order No and dated	Extension order No and dated if any
1	2310209	Muhammad Javed	DIKhan	129.48	GhsKiriKhisore	No:2084-91 &Dated:30/04 /2014	No: 4913-20 Dated: 28-04-2017
2	2310338	Shafiq Ur Rehman	DIKhan	128.35	GHS GarraMohabat	-do-	-do-
3	2310302	Liaqat Ali	DIKhan	126.91	GHS kata Khel	-do-	-do-
4	2310311	Samoor Khan	DIKhan	125.16	GHS Gandi Umar Khan	-do-	-do-
5	2310221	Muhammad Fahem Khan	DIKhan	123.63	GHSS Abdul Khel	-do-	-do-
6	6011387	Ghulam Ali	DIKhan	122.83	GHSS Kacha Mali Khel	-do-	-do-
7	2310235	Muhammad Arslan Nawaz	DIKhan	122.61	GHS JhokeMoazam	-do-	-do-
8	2310378	Moeen Ud Din	DIKhan	122.21	GHSS Kathgarh	-do-	-do-

9

59	233001470	Muhammad Saleem	DIKhan	133.54	GHS KotAittal Sharif	-do-	NA
60	233002476	Muhammad Irfan	DIKhan	133.53	GHS GaraMohabal	-do-	NA
61	233002276	Hameed Ullah Khan	DIKhan	133.45	GHSS Kacha Mali Khel	-do-	NA
62	233001453	Syed Muhammad Imran Shah	DIKhan	133.18	GHS BaggiQamar	-do-	NA
63	233001628	JavedIqbal	DIKhan	132.73	GMS KotKundian	-do-	NA
64	233002405	GhulamSaddique	DIKhan	132.62	GHS KotAittal Sharif	do-	NA
65	233001496	Aman Ullah	DIKhan	132.6	GHS Mangal	-do-	NA
66	233002082	NiazHussain	DIKhan	132.19	GHS Saiduwali	-do-	NA
67	233002097	Muhammad Imran	DIKhan	132.16	GMS Malikhi	No:2930-36 & Dated: 31-07-2017	NA

Minority Quota

68	233002641	IthmarJamil	DIKhan	118.15		No:4472-79 & Dated:26-04-2017	NA
69	233001406	NomanFarrukh	DIKhan	100.06	GHSS DarabanKhurd	-do-	NA

Disable Quota

70	233002032	Muhammad Waqas Khan	Dikhan	127.16	GHSS No.2 DIKhan	No.4472-79 & Dated:26-04-2017	NA
71	233002595	Inayatullah Khan	DIKhan	127.88	GHS Dinpur	1705-12 & Dated 09/06/2017	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.
- 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.
- 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.

10

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)

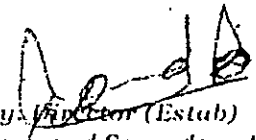
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

4582-95

Inst: No. File No. 15/A-14/SST/Adhoc/Appt: Dated Peshawar the 22/3/2018.

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) DIKhan.
4. District Accounts Officer DIKhan.
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



Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

22/3/18

Serial No. GU 25391

1
GOMAL UNIVERSITY



DERA ISMAIL KHAN
(KHYBER PAKHTUNKHWA PAKISTAN)

GRADE CARD

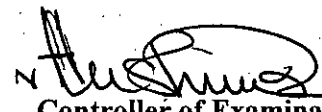
MSCS 3rd SEMESTER
Session: 2014-2016

Roll No:	78	Reg: No.	1266-ICIT-09
Name	Muhammad Imran	Father's Name	Haji Ismail

EVALUATION

Title	Credits	Marks %	Grade	G.P.	G.P.x Credits
Opinion Mining & Sentiment Analysis	3	83	A	4.00	12.00
Research Methods	3	82	A	4.00	12.00

GPA of 1 st Semester	3.03
GPA of 2 nd Semester	4.00
GPA of 3 rd Semester	4.00
CGPA	3.64
Grade	B+
Remarks	<u>Very Good</u>
Result declaration date	<u>07-08-2017</u>


Controller of Examinations
Gomal University D.I.Khan

IA

12

Nº 103562

GOMAL UNIVERSITY



DERA ISMAIL KHAN

(KHYBER PAKHTUNKHWA PAKISTAN)

GRADE CARD

MSCS 2nd SEMESTER

Session: 2014-2016

Roll No:	78	Reg: No.	1266-ICIT-09
Name	Muhammad Imran	Father's Name	Haji Ismail

EVALUATION

Title	Credits	Marks %	Grade	G.P	G.P.x Credits
Intelligent System Design	3	85	A	4.00	12.00
Advanced Computer Architecture	3	82	A	4.00	12.00
Data Mining	3	81	AF	4.00	12.00

GPA of 1 st Semester	3.03
GPA of 2 nd Semester	4.00
Grade	A
Remarks	<u>Excellent</u>
CGPA	<u>3.52</u>
Result declaration date	<u>07-08-2017</u>

[Signature]
Controller of Examinations
Gomal University D.I.Khan

HA

13

No. 103563

GOMAL UNIVERSITY



DERA ISMAIL KHAN
(KHYBER PAKHTUNKHWA PAKISTAN)

GRADE CARD

MSCS 1st SEMESTER
Session: 2014-2016

Roll No:	78	Reg: No.	1266-ICIT-09
Name	Muhammad Imran	Father's Name	Haji Ismail

EVALUATION

Title	Credits	Marks %	Grade	G.P	G.P.x Credits
Advanced Operating Systems	3	60	C	2.00	6.00
Advanced Algorithms Analysis	3	71	B	3.10	9.30
Advance Theory of Computation	3	93	A+	4.00	12.00

GPA of 1 st Semester	3.03
Grade	B
Remarks	<u>Good</u>
Result declaration date	<u>07-08-2017</u>

A handwritten signature in black ink, appearing to read 'Mustafa' or similar.
Controller of Examinations
Gomal University D.I.Khan
JA

Serial No. 0000539

GOVERNMENT

DIPLOMA IN MATHEMATICS

(Session 1947-48)



(Session 1947-48)

and a student of the
having passed the prescribed
is this day admitted by

BAGHET OF DIPLOMA IN MATHEMATICS

The Examination was taken on a

Registered No. 1265-111-1

1265-111-1

Result declared on 12/12/48

[Handwritten Signature]

Controller of Examinations

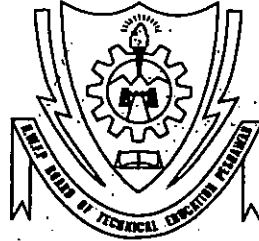
[Handwritten Signature]

Serial No. 22883

Roll No. 111401

15

NWFP BOARD OF TECHNICAL EDUCATION



PESHAWAR (PAKISTAN)

Diploma of Associate Engineer

Year 2009

(Annual / ~~Supplementary~~)x

Certified that Mr. / Miss. MUHAMMAD IMRAN

Son / Daughter of Mr. HAJI ISMAIL

Registration No. GCT/DIK/ET/06-36163

of GOVT. COLLEGE OF TECHNOLOGY, D.I.KHAN

has passed the Diploma of Associate Engineer Electrical Technology Examination held by the N.W.F.P. Board of Technical Education, Peshawar, in the month of May, 2009.

He / She secured 2394 Marks out of 3550 and has been placed in Grade 'B'

In recognition thereof, this

Diploma of Associate Engineer

is awarded to him / her at Peshawar on the 15th day of Sept. 2010.


ASSISTANT SECRETARY


SECRETARY

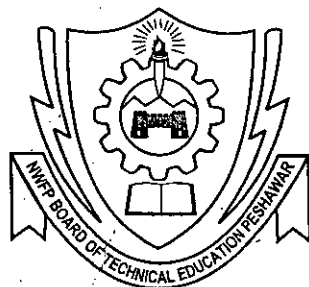
This certificate / diploma is issued without any alteration or erasure.

16

153170

NWFP BOARD OF TECHNICAL EDUCATION

PESHAWAR



DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 3RD YEAR ELECTRICAL

Name of Candidate MUHAMMAD IMRAN

Father's Name HAJI ISMAIL

Roll.No. 111401 Session ANNUAL 2009

Reg.No. GCT/DIK/ET/06-36163

Institute/College GOVERNMENT COLLEGE OF TECHNOLOGY DI KHAN



Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
2nd Year Marks	2250			1,480	
1 GEN-311 Islamyat/Pak. Studies	50	38	-	38	Thirty-eight
2 MGM-311 Industrial Manag: Human Relation	50	30	-	30	Thirty
3 MGM-321 Business Communication	50	28	-	28	Twenty-eight
4 ET-316 A.C. Machines	200 / 100	112	85	197	One hundred ninety-seven
5 ET-322 Power Plant & Energy Conservation	100	84	-	84	Eighty-four
6 ET-336 Trans, Dist. & Project of Elect Power System	200 / 50	109	41	150	One hundred fifty
7 ET-343 Telecommunication	100 / 50	90	43	133	One hundred thirty-three
8 ET-353 Repair & maintenance of Electrical Equipment	50 / 100	29	79	108	One hundred eight
9 ET-364 Digital & Industrial Electronics	150 / 50	164	42	146	One hundred forty-six

8850

2394 Two thousand three hundred ninety-four

Prepared by: Aamir Iqbal

Checked by: _____

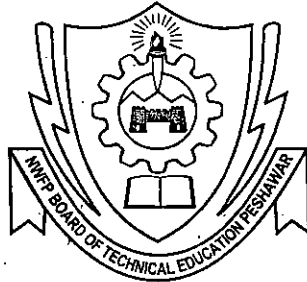
Theory Passing Marks=60% Practical Passing Marks=60%

Errors & Omissions (if any) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate


CONTROLLER OF EXAMS
 02/08/2009

NWFP BOARD OF TECHNICAL EDUCATION

151703



PESHAWAR

DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 2ND YEAR ELECTRICAL



Name of Candidate: MUHAMMAD IMRAN
 Father's Name: HAJI ISMAIL
 Roll No. 201398 Session ANNUAL 2009
 Reg. No. GCT/DIK/ET/06-36163
 Institute/College: GOVERNMENT COLLEGE OF TECHNOLOGY DI KHAN

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
1st year Marks	1100			719	
1. GEN-211 Islamiyat/Pak. Studies	50	31	-	31	Thirty-one
2. MATH-233 Applied Mathematics	150	132	-	132	One hundred thirty-two
3. MGMT-221 Business Management & Industrial Economics	50	28	-	28	Twenty-eight
4. PHY-222 Applied Physics	50 / 50	24	40	64	Sixty-four
5. ET-213 DC Machines & Batteries	100 / 50	56	35	91	Ninety-one
6. ET-223 Electrical Instruments and Measurement	100 / 50	52	45	97	Ninety-seven
7. ET-233 Utilization of Electrical Energy	100 / 50	40	41	81	Eighty-one
8. ET-242 Installation, Planning & Estimating	50 / 50	26	44	70	Seventy
9. ET-263 Basic Electronics	100 / 50	45	41	86	Eighty-six
10. ET-291 Applications of Computers in Electrical Technology	50	-	38	38	Thirty-eight
11. ET-271 Workshop Practice-II (Basic Machine Shop)	50	-	43	43	Forty-three

2250

1480 One thousand four hundred eighty

Prepared by Norhan

Checked by _____

Theory Passing Marks=40% Practical Passing Marks=50%

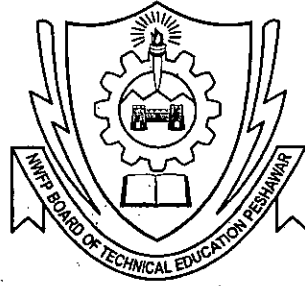
Error(s) & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate


CONTROLLER OF EXAMS
 02/09/2009

18

S. No. 115275

NWFP BOARD OF TECHNICAL EDUCATION



PESHAWAR

DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 1ST YEAR ELECTRICAL



Name of Candidate MUHAMMAD IMRAN

Father's Name HAJI ISMAIL

Roll.No. 72303 Session ANNUAL 2008

Reg. No. GCT/DIK/ET/06-36163

Institute/College GOVERNMENT COLLEGE OF TECHNOLOGY DI KHAN

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
1 GEN-111 Islamiyat / Pak. Studies	50	28	-	28	Twenty-eight
2 GEN-112 English	100	45	-	45	Forty-five
3 MATH-123 Applied Mathematics	150	103	-	103	One hundred three
4 CH-132 Applied Chemistry	50 / 50	27	40	67	Sixty-seven
5 COMP-122 Computer Applications	50 / 50	46	40	86	Eighty-six
6 ET-115 Principles of Electrical Engineering	150 / 100	80	96	176	One hundred seventy-six
7 ET-146 Workshop Practice	50	23	-	23	Twenty-three
8 i) Wiring	100	-	81	81	Eighty-one
9 ii) Metal Work	50	-	28	28	Twenty-eight
10 iii) Wood Work	50	-	26	26	Twenty-six
11 iv) Welding	50	-	28	28	Twenty-eight
12 ET-121 Basic Electrical Drawing	50	-	28	28	Twenty-eight

1100

716 Seven hundred nineteen

Prepared by Muhammad

Checked by _____

CONTROLLER OF EXAMS

Theory Passing Marks=40% Practical Passing Marks=50%

Errors & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

07/02/2009

19

Allama Iqbal Open University Islamabad



Serial No. 250313

Certified that Mr. / Ms. MUHAMMAD IMRAN

Son / Daughter of HAJI ISMAIL

Registration No: 07NDN2482 Roll No: BA636393

having successfully completed the prescribed requirements
in semester SPRING 2015 is awarded the degree of

Bachelor of Education (B.Ed)

He / She has secured 73 % marks and has been placed in A grade.

M. Iqbal
CONTROLLER OF EXAMINATIONS



S. Iqbal
VICE-CHANCELLOR

Result declared on: January 14, 2016

Date of Issue: January 03, 2017 /

Serial No. 140384

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
TRANSCRIPT



DMC No. 164251 Roll No. BI622053
Name MUHAMMAD IMRAN Registration No. 07NDN2482
Father's Name HAJI ISMAIL Enrollment Semester SPR-2016
Address VIL PAROVA NEAR PROVA POLICE STATION PAROVA ADDAH Final Semester SPR-2017
Tehsil PAROVA
District D. I. KHAN



has successfully completed MASTER OF EDUCATION (M.ED)
TEACHER EDUCATION

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
SPR- 16	0831	FOUNDATIONS OF EDUCATION	100	64
SPR- 16	0837	EDUCATIONAL RESEARCH	100	74
SPR- 16	0838	CURRICULUM DEVELOPMENT & INSTRUCTIONS	100	76
SPR- 16	0840	EDUCATIONAL PSYCHOLOGY	100	69
AUT- 16	0826	ELEMENTARY EDUCATION	100	77
AUT- 16	0827	SECONDARY EDUCATION	100	71
AUT- 16	0828	HIGHER EDUCATION	100	63
AUT- 16	0829	TEACHER EDUCATION IN PAKISTAN	100	59
SPR- 17	6505	ISLAMIC SYSTEM OF EDUCATION	100	69
SPR- 17	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	70
SPR- 17	6552	TEXTBOOK DEVELOPMENT-I	100	68
SPR- 17	6553	TEXTBOOK DEVELOPMENT-II	100	70

Credit Hours 36
Result Declared on MARCH 29, 2018
Date of Issue APRIL 10, 2018

Total Marks/Obtained 1200 / 830
Percentage/Grade 69 / B

Imran
Controller of Examinations

Disclaimer:

This result card/transcript is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 795574

PROVISIONAL RESULT CARD

Name MUHAMMAD IMRAN
 Father's Name HAJI ISMAIL
 Address VIL PAROYA

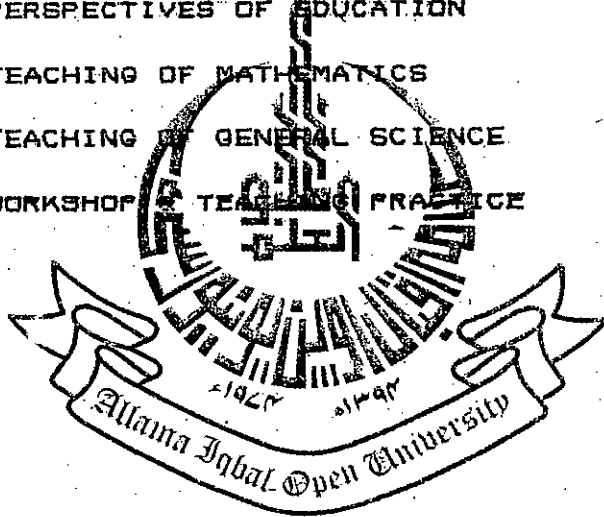
Roll No. BA636393
 Registration No. Q7NDN2482
 Final Semester SPR-2015

Tehsil PAROYA
 District D. I. KHAN

has successfully completed BACHELOR OF EDUCATION (B. ED)

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 14	0513	SCHOOL ORGANIZATION	100	63
AUT- 14	0651	ENGLISH (COMPULSORY)	100	63
AUT- 14	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	69
AUT- 14	0514	EVALUATION, GUIDANCE & RESEARCH	100	77
AUT- 14	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	74
SPR- 15	0512	PERSPECTIVES OF EDUCATION	100	63
SPR- 15	0661	TEACHING OF MATHEMATICS	100	92
SPR- 15	0657	TEACHING OF GENERAL SCIENCE	100	71
SPR- 15	0655	WORKSHOP & TEACHING PRACTICE	100	87



CREDITS: 6

Total Marks / Obtained

900 / 659

Result Declared on JANUARY 14, 2016

Percentage / Grade 73 A

Date of issue JANUARY 25, 2016

Imran
Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 165901

PROVISIONAL RESULT CARD

Name MUHAMMAD IMRAN
 Father's Name HAJI ISMAIL
 Address VIL PAROVA

Roll No Z665013
 Registration No. 07NDN2482
 Final Semester SPR- 2008

Tehsil D. I. KHAN
 District D. I. KHAN

has successfully completed **PRIMARY TEACHING CERTIFICATE**

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 07	0614	EDUCATIONAL PSYCHOLOGY	100	58
AUT- 07	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	61
AUT- 07	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	64
SPR- 08	0618	TEACHING OF MATHEMATICS	100	76
SPR- 08	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	74
SPR- 08	0617	TEACHING OF URDU	100	55
SPR- 08	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	62
SPR- 08	0613	PRINCIPLES OF EDUCATION	100	56
SPR- 08	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	86

CREDITS: 5

Total Marks / Obtained 900 / 592

Result Declared on MARCH 14, 2009

Percentage / Grade 66 B

Date of issue APRIL 04, 2009

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card dose not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

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

42

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"; or</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>

28

				<p>Senior Teaching 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;</p> <p>(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:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(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:</p>
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27

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

(TAMIN KHAN MOMAN)
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: -

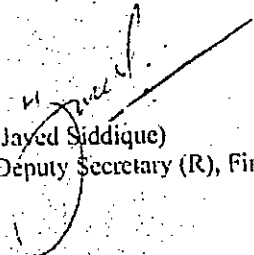
Sl. No.	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1	Subject Specialist-Information Technology (SS-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in 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)

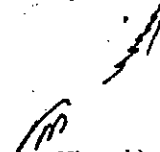
The meeting ended with vote of thanks to/from the Chair.

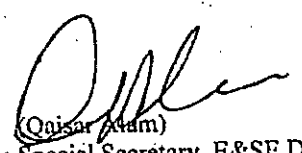

(Jayed Siddique)
Deputy Secretary (R), Finance Department

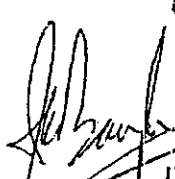

(Mohsin Mushtaq)
Assistant (R-I), E&AD Deptt:


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


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


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


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


Dr. Shahzad Khan Bangash
Secretary E&SE Department
(Chairman)
12/9/17

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)

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

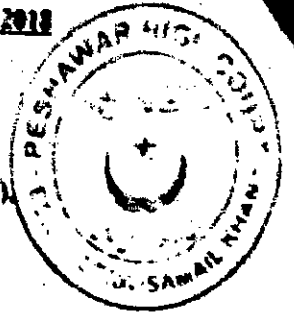
"E"

Writ Petition No. 877-D with C.M. 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 Miankhel, 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."

ATTEST
22-2-19
EXAMINOR
Peshawar High Court
D.I. Khan Bench

Amir

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

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."

ANJEL
22-02
EXAMINOR
Jashwar High Co.
O.I. Khan Bt

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 grounds 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 forums for the redressal of their grievance, if so advised.

Announced
Dt. 30.01.2019
JUDGE

JUDGE

JUDGE

DDP
Hon'ble Mr. Justice S.M. Anwar Shah
Hon'ble Mr. Justice Shabbir Ahmad

off
11/2

557
G.R. No. _____
Applicant: Requested on 12-02-19
Copy to _____
No of Pages 05 Page
Copy Fee 000
Urgent Fee _____
Total Fee 200
Copy ready for delivery 12-02-19
Copy delivered on 12-02-19
Signature of Applicant _____
12-02-19

Confined to go to the Court
EXAMINER
Sd/-
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 GC/HS no. D.I.Khan as SST (Physics & Mathematics).
2. Kalim Ullah S/O Rehmat Ullah Cas Baluch R/O Mohallah Ahmad Saib Eid Gah D.I.Khan currently working as ASDEO SST (General) elmdwun 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 Minly 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 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 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).

Amir

VERSUS

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 (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) 4-5/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

ATTESTED
 12-02-19
 EXAMINER
 Peshawar High Court
 D.I.Khan District

بعد الترسوس ٹریبونل حکمران خیر خواہان چوہدری

2 پنجاب ریلوے

محمد عمران بنام حکومت

روس ایل

مدرجہ
مقدمہ
دعویٰ
جہم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ~~روس ٹریبونل~~ کیلئے ~~سماوات~~ ~~الٹرناٹو~~ ~~انٹرنیشنل~~ ~~ایمرٹون~~ ~~فعلی~~ ~~کر رہا~~
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار و گاہ۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریر نمائندہ فیصلہ بر حلف دیئے 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 برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانباً اتوائے مقدمہ کے سبب سے 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 سند ہے۔

المرقوم 26

ماہ جولائی 2018

واہ العب

کے لئے منظور ہے۔

روس ٹریبونل

Attested
Accepted

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

Service Appeal No: 1169/2019

Muhammad Imran SST B-16 (M) District D.I.Khan.....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.


Deponent

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
 PII No. 091-92-5339, 925344.
 Fax 091-92-5343.
 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/E) 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 NPS-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
	Hayat Khan	Mohalla Lanchi Shah Lower Village And Post Office Darara. CNIC No.15701-5666599-1	127.56	GHS Ganari	2068-75 dated 16-02-2014	4913-20 dated 28-02-2017
	Wahedullah	Village Karat Dabari PO Office Shokor Telen Tangi District Charsadda CNIC No 15702-5206231-1	123.80	GHS Miana Darg	-do-	-do-
	Amir Rahim	Village And Post Office Alphas Modatlah Dak District Dir Upper CNIC No 15701-8528456-9	127.77	GHS Sankool	-do-	-do-
	Muhammad Hassan	Village Oseani Tehsil And Post Office Wari District Upper Dir CNIC No.15703-0908885-7	126.79	GHS Pachir Kabri	-do-	-do-
	Amjad	Village And Post Office Chakran District Dir Upper CNIC No 15701-0487377-7	125.92	GHS Secraji	-do-	-do-
	Lahifur Rahman	Village Monabandi Post Office Bibyanar Distt And Tehsil Dir Upper CNIC No 15701-5420610-2	124.04	GHS Gandigar	-do-	-do-

2017

Sr.	Name	Name	Permanent Address	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
	Asimullah	Haidshah Hassan	Village Shiwkand Pa Wari Teh Wardi District Upper Dir CNIC No.15702-3705598-7	117.72	GHS Nohay	1878-84 dated 28-02-2017	NA
	Asimullah	Amir Nasir	Village Datal Post Office Sankool District Tehsil Upper Dir	113.79	GHS Ustari	-do-	NA

Dir Upper Male SSTs Regularization order-2018

			CNIC No. 15701-8303080-5				
9	791000140	Ishfaq Ahmad	Village Qasimabad Osirai Tehsil And Post Office Wari District Dir Lower CNIC No. 15702-7113478-5	125.16	GHS Malangu	-do-	NA
10	791000180	Sharif Allah	Village Motor Mahallah Cheral Post Office Asid Tehsil Wari District Upper Dir CNIC No. 15702-7040819-9	129.23	GHS Jatgrami	-do-	NA
11	791000125	Abdul Haseeb	Village Wari Payeen Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-1448399-9	129.49	GHSS Wari	-do-	NA
12	791000071	Muhammad Ajmal Khan	Village Wari Post Office And Tehsil Wari District Upper Dir CNIC No. 15702-6882524-1	127.32	GHSS Wari	-do-	NA
13	791000163	Hamid Zia	Village Jeldr Post Office Wari Tehsil Wari District Dir Upper CNIC No. 15702-8720858-9	127.24	GHS Jeldr	-do-	NA
14	151001101	Muhammad Shuaib	Fauji Abad Post Office Dargai Tehsil And District Mardan CNIC No. 36101-0080745-7	126.36	GHS Gamseer	-do-	NA
15	791000062	Nasir Ahmad	Ahmad Public School And College Wari Dist Upper Dir CNIC No. 15702-6029389-1	126.26	GHS SS Khel	-do-	NA
16	601000978	Farman Ali	Afghan Colony Street #2 House No. 279 Tab Well Chatak Peshawar City NCIC# 17301-5086997-0	126.0	GHSS Nehaq	-do-	NA
17	791000089	Muhammad Shahab	Village And Post Office Burinjal Bandi District Dir Upper CNIC No. 15701-4790667-7	125.01	GHSS Choukya (an)	2983-89 dated 17-05-2017	NA
18	791000187	Khanista Rajman	Village Nagrai Post Office Sahib Abad Tehsil Wari Dir Upper CNIC No. 15702-6933866-3	124.82	GHSS Borawal Bandi	4878-89 dated 28-04-2017	NA
19	791000076	Farman Ullah	Village Cham, P/O Sheringal District Dir Upper CNIC No. 15701-4715187-7	124.64	GHSS Patrak	-do-	NA
20	791000067	Badshah Sardar	District And Tehsil Upper Dir Post Office Bibyanwar Village Kair District Upper Dir CNIC No. 15701-2314328-7	123.67	GMHS Dir	-do-	NA
21	791000058	Lal Rehman	Village Bibyanwar Dir Upper CNIC# 15701-6091297-7	123.52	GHSS Ushorai	2037-43 dated 31-07-2017	NA
22	791000153	Yusuf Khan	Village & PO Tehsil Wari District Dir Upper CNIC# 15702-5950950-3	123.10	GHSS Pertrak	-do-	NA

SST Maths Physics 2014

Serial	Name	Address	Score	Name of School	Appointment order No and dated	Extension order No and dated if any
	Qasim Khan	Village Qasimabad Pa. Dir Upper District Lower Dir CNIC No. 15701-5704832-1	119.4	GHS Bui Bala	2017-111 dated 30-04-2014	2017-20 dated 28-04-2017
	Shanib	Mahallah Chauria Kattan Payeen Post Office Dargai Upper Dir CNIC No. 15701-6091826-1	117.05	GHS Ushorai	-do-	-do-

Dir Upper Male SSTs Regularization order-2018

2015

Sr#	Roll No	Name	Address	Total Marks (out of 200)	School/remarks	Appointment order No and dated	Extension order No and dated if any
	7920016	Muhammad Nazeem Khan	Village Darara District Dir Upper CNIC No. 15701-6291563-9	123.1	GHS Chakorian	3987-93 dated 30-11-2015	3987-93 dated 30-11-2015
4	7920043	Ali Akbar Khan	District Upper Dir Tehsil Dir Uj Darara Mohallah Shari Abad District Upper Dir CNIC No. 15701-9678517-3	127.91	GHS Belo	-do-	-do-
5	7920025	Antwar Ullah	Village Unrolai Payeen Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-9888832-9	127.8	GHS Sparko	-do-	-do-
6	7920069	Imran Khan	Village, Tehsil Wari District Dir Upper CNIC No. 15702-2289956-3	123.56	GHS Gandig or	-do-	-do-
7	7920030	Muhammad Ishfaq	Village Sarotai District Dir Upper CNIC No. 15701-7267964-5	118.43	GHS Ganshal	-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
8	7920000 80	Allaf Ur Rahman	Village Jabar Post Office Gamseer Tehsil Dir District Dir Upper CNIC No. 15701-4227032-3	136.62	GHS Gamseer	4878-84 dated 28-04-2017	NA
9	7920000 51	Umar Farooq	Village Hichkaley Post Office Cakorian Tehsil And Dir And District Dir Upper CNIC No. 15701-9896605-2	131.93	GCMHS Dir	-do-	NA
10	8920000 07	Fazal Wahid	The Home Of Knowledge School And College Wari Upper Dir CNIC No. 15702-6011364-3	124.70	GHS SS Khel	-do-	NA
11	6020000 30	Shuja Ur Rehman	Vill Suldam Post Office Sharnigal District Dir (U) CNIC No. 15701-6612791-2	124.32	GHS Douy (P)	-do-	NA
12	7220001 29	Shah Abdul Aziz	Vill Tangai Teh And Post Office CNIC No. 15702-2406118-9	122.36	GHS Jutgram	-do-	NA
13	7920001 17	Aftab Ullah	Village Batai Usheri Darra District And Tehsil Upper Dir CNIC No. 15701-8457716-9	121.04	GHS Barawal Banchi	-do-	NA
14	9820001 86	Muhammud Tariq	Swat Collegiate School And College Khuzia Khela Swat CNIC No. 17101-2207923-3	120.81	GHS Nehaq	-do-	NA
15	7120000 81	Zia Ullah	The Crescent Model School Wari Upper Dir CNIC No. 15702-4694431-1	120.73	GHS Wari	4604-10 dated 24-09-2017	NA
16	2020000 91	Ihsan Ullah Khan	Village Kakul Te And Post Office Wari District Dir Upper CNIC No. 15703-8601145-9	118.99	GHS Wari	3257-84 dated 19-10-2017	NA
17	4520005 91	Muhammud Wassem	Village Baskuni Pa Usher Tehsil Dir District Upper Dir CNIC No. 15701-0402601-2	118.91	GHS Patrak	4878-84 dated 28-04-2017	NA
18	7920001 08	Zafar Khan	Village Begam T/O And Teh Wari CNIC No. 15702-1522805-5	117.99	GHS Baudai (P)	-do-	NA
19	8920002 91	Muhib Ullah	Village Sudi Danda T/O Akman Tehsil And District Upper Dir	117.80	GHS Darara	-do-	NA

Dir Upper Male SSTs Regularization order-2018

21	702000022	Muhammad Ishaq	CNIC No.15701-0101285-1 Village Umar Kot Tehsil And Post Office Wari Dist Dir Upper CNIC No.15701-2101215-1	112.81	GHS Jalor	-do-	NA
22	702000043	Hassan Ullah	Village Kalan Pajura Post Office Daroga Dir Upper CNIC No.15701-0211881-3	112.06	GHS Patrak	-do-	NA
23	6020000506	Muhammad Anwar	Room Number 51 Hostel Number 03 Quaid E Azam University Of Islamabad CNIC No.15701-8704411-1	116.08	GHS Jelar	-do-	NA
24	702000025	Suhail Ahmad	Mohallah Barhami Village Jabar Post Office Gujranwala Upper Dir CNIC No.15701-0875200-0	115.58	GHS Ushari	-do-	NA
25	702000021	Usman Ullah	Department Of Agriculture Extension Dist Dir Lower CNIC No.15701-1169727-6	115.52	GHS Kair Dara	-do-	NA
26	702000046	Syed Fozal Ghani	Vill & P/O Ganori Tehl And Dist Upper Dir CNIC No.15701-0214033-9	115.05	GHS Barawal Randi	-do-	NA
27	702000073	Abdullah	Village Qudla Post Office Akhagrom Tehsil Wari Dir Upper CNIC No.15701-0214006-5	113.92	GHS Wari	-do-	NA
28	702000029	Muqbool Ali	Village And Post Office Wari Dir Upper CNIC No.15701-0606908-3	100.88	GHS Hayagan (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 Yasir	Jamia Usmania, Usmania Colony, Nohia Road Peshawar Cantt, Peshawar CNIC No.17301-6115872-3	128.97	GHS Kair Dara	2084-91 dated 20-04-2014	4913-20 dated 28-01-2017
2	Imran	Nara Wala New Model Colony Post Office And Tehsil Takht Bhari CNIC No.15701-2925246-0	136.69	GHS Duro	-do-	-do-
3	Sahaf	Village Rehankot Tehsil And Post Office Dir District Upper Dir CNIC No.15701-0921667-5	135.98	GMS Debanda	-do-	-do-
4	Hazrat Said	Village Thal, Mohallah Haji Sial Tehsil And Post Office Rakkar CNIC No.15701-0367458-3	133.16	GMS Sundri	-do-	-do-
5	Shakeel Khan	Village Gopal Post Office And Tehsil Wari District Dir Upper CNIC No.15701-5182460-9	132.12	GHS Shinkari	-do-	-do-
6	Sanaullah Khan	House No.127 Sector D/1 Mirpur Aje CNIC No.15701-4116172-7	131.19	GHS Besha	-do-	-do-
7	Muhammad Faraz	C/O Zakir, Pholostate Main Bazar Dir Post Office Dir Tehsil Dir CNIC No.15701-1193380-3	131.13	GMS Buhari	-do-	-do-
8	Hassan Ullah	House No.114 Near Bilal Masjid Bilal Lane Arbab Road-University Of The Peshawar CNIC No.15701-1876014-0	129.49	GHS Sori Sultan Khalil	-do-	-do-
9	Muhammad Israr	District Tehsil Post Office Dir Upper Main Anzar Dir Israr Campus Center CNIC No.15701-1232152-5	129.08	GHS Rabbani	-do-	-do-
10	Umar Ullah	15701-0811000-1 CNIC No.15701-0811000-1	127.5	GHS Janbatti	-do-	-do-
11	Mohammad Ullah	Village Hoyar Kohistan District Dir Upper	126.10	GHS Badarkani	-do-	-do-

030

Dir Upper Male SSTs Regularization order-2018

5

	CNIC No 15703-8054529-7				
12	Wari P/Off	P/O Wari Tehsil Wari Village Wari Pajeen Middlepau	106.03	GHS Bandan Osori	-do-

2015

Sr	Roll No	Name	Address	Acadmic Marks (out of 100)	School/re marks	Appointment order No and dated	Extension order No and dated if any
13	7930066	Huzrat Wahab	Village Mano Bando Post Office Bibiywar Tehsil And District Dir Upper CNIC No:15701-8164289-3	64	GMS Sison	-do-	-do-
14	7930362	Abdullah	Mohallah Qasmani Village Katan Pajeen Post Office Dgorar Tehsil Upper Dir District Upper Dir CNIC No: 15701-5406002-9	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 Gogyal Mohallah Gogyal Colony Tehsil And Post Office Wari CNIC No:15702-3434680-5	153.45	GMS Gandar	4878-84 dated 23-04-2017	NA
16	793000333	Muhtezeb Ullah	Post Office Box Tehsil Barawal Banda District Dir Upper Mohallah Bangloy Cham CNIC No:15703-6281849-5	139.41	GMS Nasrai	-do-	NA
17	793000193	Fazal Hayat	Vill Jangraon Post Office Wari Tehsil Wari District Dir Upper Kpk CNIC No:15702-6196967-7	139.30	GHS Karkobanj	-do-	NA
18	793000447	Huzrat Younas	Huzrat Younas S/O Shah Afzal Khan Village Gogyal Post Office Tehsil Wari District Dir Upper CNIC No:15702-1620882-9	137.47	GHS Jelar	-do-	NA
19	793000724	Abdul Wahid	Village Haji Shah Tehsil P/O Kalkot Kir Upper Kpk CNIC No:15703-4834260-9	137.03	GHSS Patrak	-do-	NA
20	793000678	Irfan Ullah	Vill Bandai Teh And P/O Wari Dist Upper Dir CNIC No:15702-6290918-5	136.72	GMS Shaltalo	-do-	NA
21	793000727	Faiz Ul Alim	Village And Post Office Sheringal Dist Dir Upper CNIC No:15701-5953930-3	136.65	GMS Douq (B)	-do-	NA
22	793000711	Kaleem Ullah	Village P/O Sahib Ahmad District Dir Upper CNIC: 15702-7305643-9	135.88	GHSS Royar	5057-03 dated 24-08-2017	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.

10 (6)

Dir Upper Male SSTs Regularization order-2018

2. 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.
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 GP 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 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 older in age shall rank senior to the younger one.

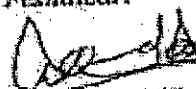
(Farid Ahmad Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

2969-75
Encls: No. / File No. 25/A-14/SST/Adhoc/Apptt: Dated Peshawar the 13/4/2018.

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) Dir Upper.
4. District Accounts Officer Dir Upper.
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


Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

17/4/18

15

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)



UNIVERSITY OF MALAKAND
PAKISTAN

DETAILED MARKS CERTIFICATE

BS (4-year) in Computer Science

Department of Computer Science & IT

Session (2007-2011)

Name: Muhib Ullah

F/Name: Akbar Said Khan

Reg. No: 20070010010

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

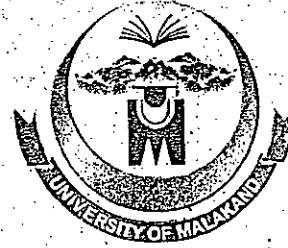
Prepared by: [Signature] Checked by: [Signature]

[Signature]
Controller of Examinations
University of Malakand

University of the Punjab (Transfer) Rules, 1987
The Finance Department
Lahore



PAKISTAN



Session 2007-2011

MUHBIB 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

Assurance Date 21-Mar-2012

Countersigned

m. Rasool
Vice Chancellor

14

(2)



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



Student's Name	Muhib Ullah	Father's Name	Albar 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	70	70	11.1	3.75	PROMOTED
6		CS 705	System Re-Engineering	3	100	75	75	10.5		
7		CS 704	Software Re-Engineering	3	100	85	85	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	86.6
Total Points	24+06 = 30
Total Cr. Hrs	3.61
CGPA	

Countersigned by

 Controller of Examinations
 University of Malakand
 Dated: 28/04/18

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

MS/Ph.D. Coordinator

 Deptt. of Computer Science
 University of Malakand

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

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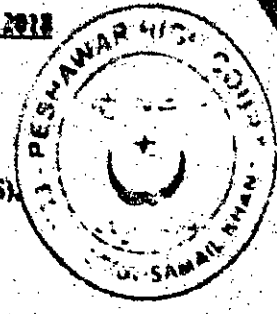
JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, D.I. KHAN BENCH
Local Department

Writ Petition No. 877-D with C.M. Nos. 1899-D & 1901-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. 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."

ATTENUE
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."

ATTESTED
 22-02
 EXAMINOR
 Jhajar High Co.
 O.I. Khan & Co.

Code: In question and answer Department and Division of the Government of Punjab

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 granted 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

(30)
Hon'ble Mr. Justice S.D. Jaiswal
Hon'ble Mr. Justice Shakti Kumar

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1/2

G.R. No. 557
Applicant: Registered encl-02-19
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Total Fee: 20
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12-02-19
Registrar High Court, Ranchi District
Ranchi
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 GCHIS 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 Fateh 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 Mungal SST (General).
5. Abdul Ghafoor S/O Ghulam Nabi Khan R/O Village Lunda Para Tehsil Parova D.I.Khan currently posted at 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 Khei 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).

Shirazi

VERSUS

EXAMINOR
Peshawar High Court
D.I.Khan

- 19
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&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

ATTACHED
15-02-19
EXAMINOR
Peshawar High Court
D.I.Khan District

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203

23
24

IA	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	recruitment, and (b) fifty percent by initial recruitment. (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: 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; 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 (b) fifty percent by initial recruitment"; and
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1030595
 Court
 Mangal

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

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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			<p>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;</p> <p>(v) 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:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(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:</p>
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(27/12)

253

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

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

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

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

Provided that if no suitable candidate is available from amongst

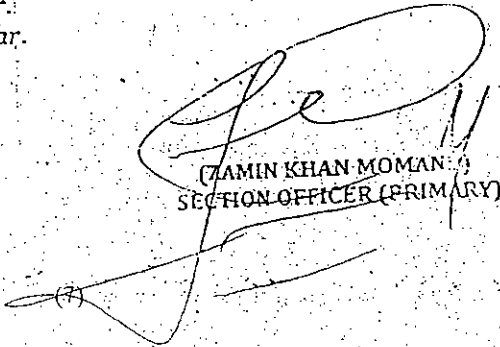
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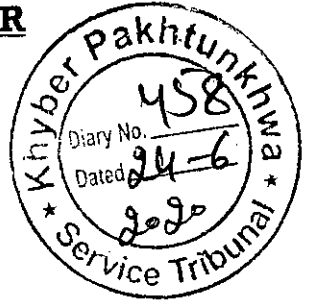
SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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


(TAMIN KHAN MOMAN)
SECTION OFFICER (PRIMARY)

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



C.M No. _____/2020

In

Service Appeal No. ~~1825~~/2019

Muhammad Imran.....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.*

[Signature]
26/6

Through

Petitioners

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

Dated:-23.06.2020

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR



C.M No. ____/2020

In

Service Appeal No. ____/____

Muhammad Imran.....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.

Best of D.P.
ad.
18/8/2020

Respectfully Sheweth:-

The petitioner humbly submits as under:-

- Read*
- 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.

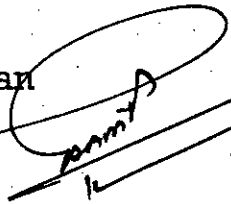
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B- That the petitioner has good prima facie case, Balance of Convenience lies in favour of petitioner & if impugned notification is not suspended the petitioner would face irreparable loss as the petitioner is discriminated in the matter.

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.

Petitioner
Muhammad Imran

Through


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

Dated:-15.06.2020

3

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. ____/2020

In

Service Appeal No. ____/____

Muhammad Imran.....Petitioner

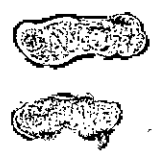
Vs

Govt of KPK & Others.....Respondents

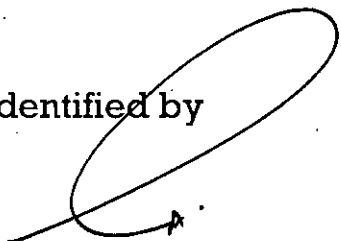
AFFIDAVIT

I, Muhammad Imran (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



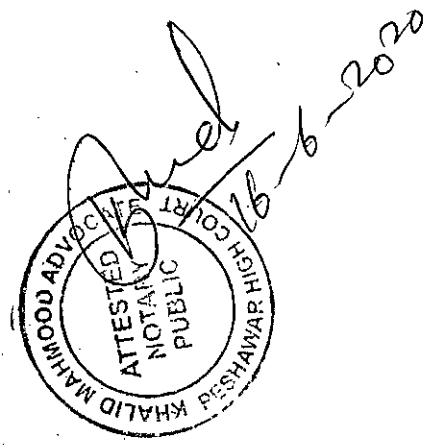
Identified by



Saadat Ullah Khan Tangi

Advocate High Court

Peshawar





Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa

No. 339-52 SS (IT) Promotions

Dated Peshawar the: 8/6/2020

Handwritten initials 'A' and 'B' in circles.

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#	Scn#	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 convereing 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