

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. 1615/2019 on 09.08.2023 before D.B. Parcha Peshi given to the parties.



(Muhammad Akbar Khan)  
Member (E)




(Salah-ud-Din)  
Member (J)

\*kamranullah\*

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.



(Fareeha Paul)  
Member (E)



(Rashida Bano)  
Member (J)

\*KaleemUllah

SCANNED  
KPST  
Peshawar


SCANNED  
KPST  
Peshawar


S.A No. 1629/2019

17.02.2023

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Tufail, Assistant for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief for arguments. Adjourned. To come up for arguments on 02.03.2023 before the D.B.


  
(Fareeha Paul)  
Member (I)

  
(Salah-ud-Din)  
Member (J)

2<sup>nd</sup> Mar, 2023

Junior of learned counsel for the appellant present. 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. Adjourned. To come up for arguments on 18.05.2023 before DB. PP given to the parties.

  
(Rozina Rehman)  
Member (Judicial)

  
(Kalim Arshad Khan)  
Chairman

SCANNED  
KPST  
Peshawar

27.09.2022

Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Bahraman ADEO and Muhammad Tufail Assistant for respondents present.

File to come up alongwith connected Service Appeal No.1615/2019 titled "Hussain Rehman Vs. Education Department" on 01.12.2022 before D.B.



(Fareeha Paul)  
Member (E)



(Rozina Rehman)  
Member (J)

01.12.2022

Junior to counsel for the appellant present.

Muhammad Adeel Butt learned Additional Advocate General alongwith Behrmand Khan Deputy Director for respondents present.

File to come up alongwith connected Service Appeal No.1615/19 titled "Hussain Rehman Vs Education Department" on 17.02.2023 before D.B.

SCANNED  
KPST  
Peshawar



(Fareeha Paul)  
Member (E)



(Rozina Rehman)  
Member (J)

14

14.04.2022

Appellant alongwith his counsel present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General for the respondents present.

On 20.12.2021, my learned predecessor, while recording order sheet, observed that the respondents were afforded last opportunity for submission of written reply/comments, but they did not submit the same even till 20.12.2021. Another last opportunity was given to them to submit written reply/comments subject to cost of Rs.2000/- but again there is no written reply/comments filed by them. Vide even order it was also held that the right of reply/comments of the respondents shall be deemed as struck off in view of the above order. To come up for arguments before the D.B on 19.05.2022.

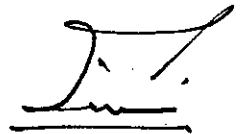


Chairman

19.05.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, 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 appellant present.

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

File to come up alongwith connected Service Appeal No.1615/2019 titled "Hussain Rehman Vs. Government of Khyber Pakhtunkhwa" on 27.09.2022 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. 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 14.04.2022 for the same as before.

  
Reader

30.12.2020

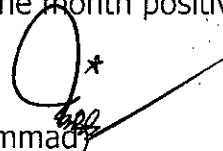
Due to summer vacation, case is adjourned to  
17.3.2021 for the same as before.

  
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  
10.9.2021 for the same.*

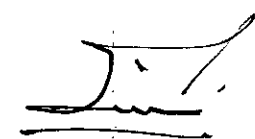
  
Reader

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

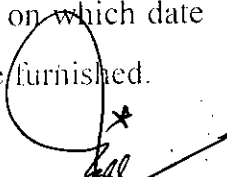
Proper D.B. is on Tour, therefore, the case is  
adjourned for the same on 30.12.2020 before D.B.

  
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

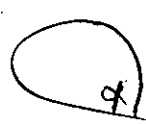
Due to public holiday on account of COVID-19, the case is adjourned to 07.07.2020 for the same. To come up for the same as before S.B.

  
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



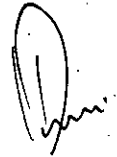
03.01.2020

Appellant present in person.

On the strength of admitting note dated 04.12.2019 handed down in Service Appeal No. 1058/2019, instant appeal is admitted to regular hearing subject to all just exceptions. 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.

13/1/20  
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

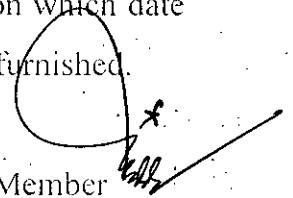


04.03.2020

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

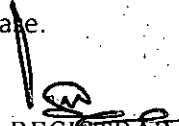
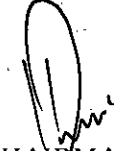


Form- A

FORM OF ORDER SHEET

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

Case No.- 1628/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/12/2019	<p>The appeal of Mr. Fazal Bari resubmitted today by Mr. Saadatullah Khan Tangi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 3/12/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/01/20</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	04/12/19	

The appeal of Mr. Niaz Ahmad SST, GHS Shamshi Khan District Dir Lower 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 signed 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 Copy of departmental appeal in respect of appellatant is not attached with the appeal which may be placed on it.
- ⑥ Copy of Writ Petition in respect of appellatant mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 7- Necessary party may be made in the heading of the appeal.

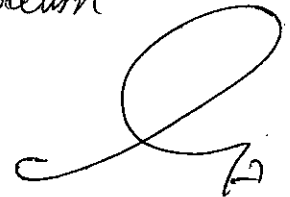
No. 1328 /S.T,

Dt. 31-7- /2019.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Saadatullah Khan Tangi Adv. Pesh.

*Re-Submitted after completion*



*17/8/19*

Objection no.4, 5 and 6 are still stand therefore, the appeal in hand is returned again to the counsel for the appellatant for completion and resubmission within 15 days.

No. 1483 /S.T,

Dt. 23/8 /2019.

  
REGISTRAR

Mr.Saadatullah Khan Adv. Pesh.

D.A. is at page 22.  
Sir! Re-submitted after completion

the same may kindly be clubbed  
with case title "Ghulam Abbas vs Govt"

fixed for 30.9.19. W.P. was  
filed by other colleagues.



20/9/19

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

Service Appeal No. 1623 /2019

Niaz Ahmed.....**Appellant**

Versus

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

**INDEX**

S#	Description of Documents	Annex	Pages
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3.	Addresses of parties		7
4.	Copy of Appointment Letter	<b>A</b>	8-19
5.	Copy of Notification dt.24.07.2014	<b>B</b>	20-25
6.	Copy of minutes of the meeting	<b>C</b>	26-28
7.	Copies of departmental Appeal and Writ Petition	<b>D &amp; E</b>	29-34
8.	Wakalatnama		35

Through Appellant

  
**Saadat Ullah Khan Tangi**  
Advocate High Court  
Cell No.0331-5030566

Dated 18.07.2019

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

Service Appeal No. \_\_\_\_\_/2019

Niaz Ahmad S/o Bakhtiar Ahmed,  
Appointed as SST, GHS Shamshi Khan,  
District Lower Dir.....**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

.....**Respondent**

**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)**

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**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 18.04.2017. (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

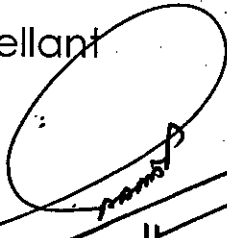


**GRUNDS:**

- 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.

Through

Appellant  
  
Saadat Ullah Khan Tangi  
Advocate High Court

Dated 18.07.2019

**CERTIFICATE**

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

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

Service Appeal No. \_\_\_\_\_/2019

Niaz Ahmed.....**Appellant**

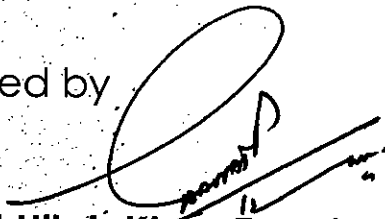
Versus

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

**AFFIDAVIT**

I, Niaz Ahmad S/o Bakhtiar Ahmed, Appointed as  
 SST, GHS Shamshi Khan, District Lower Dir, 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

CNIC#:

DEPONENT

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

Service Appeal No. \_\_\_\_\_/2019

Niaz Ahmed.....**Appellant**

Versus

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

**ADDRESSES OF PARTIES**

**APPELLANT:**

Niaz Ahmad S/o Bakhtiar Ahmed,  
 Appointed as SST, GHS Shamshi Khan,  
 District Lower Dir

**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

Dir Lower Male SSTs Regularization order SSTs -2018

8

**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) 2014**

Sr.	Roll No.	Name	Address	Total Marks [out of 200]	Name of School	Appointment order No and dated	Extension order No and dated if any
		Fazal Hussain	Village Khawas Post Office Asbaur Tehsil Asenzai Chokdara Dir Lower CNIC No 15307-4067616-7	138.51	GHS Asbaur	2068-73 dated 30-04- 2014	2017-2018 dated 28-04- 2017
1	7810201	Atta Ullah	Khyber Pakhtun Khan District Dir Lower Tehsil And Post Office Samar Bagh Village Kumbati CNIC No 15303-6144420-9	138.23	GHS Dumtal	-do-	-do-
2		Syed Ashfaq Ahmad	Village Min Banda Tehsil And Post Office Timergara CNIC No 15302- 0773090-5	137.95	GHS Meaz Banda	-do-	-do-
3	7810317	Wasiullah	Tajak Book Depot Naz Market Main Bazar Timergara Dir Lower CNIC No 15302-3709023-5	134.42	GHS Maskini	-do-	-do-
4	7810335	Shakir Ullah	Osama Cloth Depo Zarb Plaza Near Imran Hospital Timergara CNIC No 15300- 8050498-1	131.41	GHS Shal Kandi	-do-	-do-
5		Tawab Ullah	Annie Travel Agency Corqori Chowk Timergara CNIC No 15306-4826511-3	132.81	GHS Mian Kala	-do-	-do-
6		Habib Ullah Hussain	Sabman Corporation Askary Cement Dealer Balambat Road CNIC No 15306-301763-1	131.97	GHS Toor Qila	-do-	-do-

**2015**

Sr#	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
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Dir Lower Male SSTs Regularization order SSTs -2018 8

92	771000396	Zia Muhammad	Village And Post Office Khudayzai Tehsil Adenwai District Lower Dir CNIC No 15307-3739206-9	120.85	GHS Badwan	-do-	NA
93	771000417	Asad Ullah Khan (Disable)	Village And Post Office Asbanw Tehsil Adenwai District Lower Dir CNIC No 15307-9045210-5	121.87	GHS Ranwara	-do-	NA
94	891000512	Bakhtawar Said (Disable)	Nawayan Kabay Timergara Dir Lower Tehsil Timergara Village Nawaykalay CNIC No 15302-6817418-9	120.23	GHS Munjai	-do-	NA
95	891000516	Sayed Ijaz Ahmad Khan	Village Landi Koor Post Office Kotki, Tehsile Munda District Lower Dir CNIC No.15303-2582178-3	121.06	GHS Shamshi Khan	-do-	NA

SST Maths Physics 2014

Sr	Roll No.	Name	Address	Score	Name of School	Appointment order No and dated	Extension order No and dated if any
1		Nasir Ullah	Village And Post Office Dush Khel Tehsil Timergara Lower Dir CNIC No 15302-9009214-2	120.33	GHS Munjai	2076-83 dated 30-04-2014	2073-20 dated 28-04-2017
2	820153	Ghayas ud Din	Wadi Banda Kumbat Po Teh Samar Bagh Distt Dir Lower CNIC No 15302-4803050-3	124.6	GHS Badin	-do-	-do-
3		Muhammad Riaz	Village Ganjki Karaman P/O Rabat Tehsil Badamit District Lower Dir CNIC No 15306-3869905-2	122.14	GHS Wattangi	-do-	-do-
4		Muhammad Haroon Khan	Sahara College Of Science Timergara CNIC No 15306-1915816-1	121.01	GHS Mirakai	-do-	-do-
5		Zia Ullah	P/O Timergara Branch Kandaro Teh Balambat Distt Dir. CNIC No 15306-5413515-1	119.04	GHS Maskan	-do-	-do-
6		Sardar Humeed	Village Kagam, Post Office Khudayzai, Distt Dir Lower Tehsil Adazai CNIC NO.15307-0500350-4	118.69	GHS Luqman Banda	-do-	-do-
7	20185	Layool Akbar	Village Koti Gram Mohallah Khepal Barishah Tehsil Adenwai Chakdara CNIC No 15302-1215573-5	116.07	GHS Mian Kalai	-do-	-do-

2015

Sr	RollNo	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
8	720016	Muhammad Asif	Village And Post Office Saldo Tehsil Timergara Lower Dir CNIC No15302-4359201-7	130.01	GHS Laj Book	3980-86 dated 30-11-2015	6250357 dated 30-11-2017
9	720133	Arshad Iqbal	Village And Post Office Hayasari Tehsil Balambat Dir Lower CNIC No15302-5192825-1	127.07	GHS Sengolai	-do-	-do-
10	6020005	Saeed Ullah	Room Number 108 Hostel Number 09	127.45	GHS Dapoor	-do-	-do-

10

Dir Lower Male SSTs Regularization order SSTs -2018

Sr	RollNo	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated	Extension order No and dated if any
			#Allam Aigba Hostel Univeristy Of Peshawar District Peshawar CNIC No15305- 2847550-5		Balo Khan		
11	720099	Rafiq Ahmad Khan	Village And Post Office Khudayazi Tehsil Adhzai District Lower Dir CNIC No15307- 791702-0	124.04	GHS Drangal	-do-	-do-
12	720105	Ijaz Ahmad	Nareem Public School Post Office And Tehsil Timergara, District Lower Dir CNIC No15302- 6488721-9	124.15	GHS Muskini	-do-	-do-
13	7520037	Jamil Ur Rahman	Village Subhat Khan Killay Post Office Qutab Garh, Tehsil Takht Bhai, District Mardan CNIC No16102-0019597 5	123.05	GHS Beyarai	4980-86 dated 30-11- 2015	-do-

2017

Sr	RollNo	Name	Permanent Address With NIC	Total Marks (Out of 200) J-11-1	School Applied for	Appointment order No and dated	Extension order No and dated if any
11	80200023	Noor Hidayat Khan	Village Day Malala Post Office Khazana Tehsil Munda District Lower Dir CNIC No.15304-9808732-1	136.10	GHS Khazana	3095-3102 dated 18-07- 2017	NA
15	77200012	Tausif Iqbal	Village And P/O Chakdara Khas Lower Dir CNIC No.15307-3456685-3	133.71	GHS Asbaur	-do-	NA
16	80200039	Sadeeq Ullah	Shera Malakand Patan Teh Bahambal CNIC No.15306-4538277-1	120.70	GHS Koheran Malakand	-do-	NA
17	80200015	Iqbal Ud Din	Iqbal Ud Din S/O Nareem Jan Village Shekaw Lai Post Officesullo Tehsil Timergara Dir Lower CNIC No.15302-3319827-0	127.5	GHS Bahambal	-do-	NA
18	80200030	Asmat Ullah	Village And P/O Bagh Dushkhal Teh Timergara Dist Dir Lower CNIC No.15302-8717550-9	120.07	GHS Bagh Dushkhal	-do-	NA
19	80200038	Muhammad Mubtasham	Village Mangano Dehri Tehsil And Post Office Lal Qilla CNIC No.15305-201020-5	125.75	GHS Bagh Maidan	-do-	NA
20	802000154	Qusar Khan	Mohallah Gulshonabul Village And Post Office Onch West Tehsil Adenzar District Dir Lower CNIC No.15307-8218833-3	124.37	GHS Khair Abad	-do-	NA
21	80200033	Hussain Rahman	Village Tagi Noorakhali Talash Tehsil Timerra District Lower Dir CNIC No.15302-2579923-1	124.18	GHS Banda Talash	-do-	NA
22	802000047	Mageesh Farooq Sadup	Village Banda Talash Post Office Nasafa Tehsil Timergara District Lower Dir CNIC No.15302-7741407-1	123.73	GHS Onch Sharqi	-do-	NA

Dir Lower Male SSTs Regularization order SSTs -2018

11

00	802000167	Hayat Ullah	CNIC No.15307-097544-7 Village Bandagai Post Office Kumber Tehsil Lal Qilla District Lower Dir CNIC No.15307-4272952-0	110.20	GHS Chinar Kot	-do-	NA
01	802000000	Mushtaq Zada	Village Kamar Toll Tehsil And P/O Khal Lower Dir CNIC No.15705-8157972-1	110.2	GHS Taurangma	-do-	NA
02	802000253	Usaid Ullah	Village Damtal Tehsil And P/O Samarbagh District Dir Lower	110.06	GHS Dheri Kambal	-do-	NA
03	802000223	Azaid Ali	CNIC No.15303-0185023-5 Village Kouch Khani Dand Pos Toffice Ouch Gherbi Tehsil Adenzai District Dir Lower	110	GHS Ashaur	-do-	NA
04	802000005	Ihsan Ullah	CNIC No.15307-4036545-1 Village Mulla Ishambad Tafash Tehsil Tamerqara Dist Lower Dir	110	GHS Bagh Dushkhal	-do-	NA
05	802000052	Muhammad Imran	CNIC No.15302-2194270-7 Village And Post Office Tumbloy Tehsil Adenzai District Dir Lower	110	GHS Shekandai	-do-	NA
06	802000312	Niaz Ahna I	CNIC No.15000-1879880-3 Village Nagrai Payeen P/O Sarai Bala Tehsil Tamerqara Dist Dir Lower	115.05	GHS SHA5SHI Khan	-do-	NA
07	802000170	Muad Khan	CNIC No.15302-0248561-1 Village And Post Office Ouch East Tehsil Aden Zai District Lower Dir	115.58	GHS Ouch	-do-	NA
08	802000008	Imam Ullah	CNIC No.15305-1183871-7 Village And Post Office Machine Koroma Post Office Kumber Tehsil Lala Qilla District Lower Dir	115.57	GHS Zaim Daru	-do-	NA
09	802000101	Jawad Ur Rahman	West Mohallah Bourgoy Tehsil Adenzai District Dir Lower	115.42	GHS Samsarghar	-do-	NA
10	802000137	Ihsan Uddin	CNIC No.15307-0520038-5 Village And Post Office Khanpur Tehsil Adenzai District Dir Lower	115.35	GHS Khanpur	-do-	NA
11	802000701	Kamran- Ahmad	CNIC No.15307-5750729-1 Village Ajoo Talash Po Nasafa Talash Teh Tamerqara Dist Lower Dir CNIC No.15302-3968675-3	115.24	GHS Sara Bala	-do-	NA
12	802000298	Yaqoob Khan	Village A Dp Ostffice Bow Shu District Lower Dir Tehsil Adenzai Lower Dir CNIC No.15307-5146241-3	115.23	GHS Samsarghar	-do-	NA
13	802000000	Muhammad Jawad	Village Burghando P.O And Teh Lalqilla Dist Lower Dir CNIC No.15305-7703080-5	115.05	GHS Lal Qilla	-do-	NA
14	802000187	Tahir Ullah	Khall Zormandi Dist Lower Dir CNIC No.15000-1877777-5	114.97	GHS Khall	-do-	NA
15	802000115	Syed Ijaz Ahmad Kacha	Village Rabat Gamla Tehsil Bkambal District Dir Lower Kpk CNIC No.15306-1920893-0	114.05	GHS Taurang	-do-	NA
16	802000220	Usaid Ali Elmi	Village Gal Post Office Zaimdara Tehsil Lal Qilla Dir Lower	114.13	GHS Laj Book	-do-	NA
17	802000200	Jawid Khan	CNIC No.15305-3007225-7 Village Badam Bagh Kambal Tehsil And Post Office Samar Bagh Dir Lower CNIC No.15302-3394900-9	114.37	GHS Kambal	-do-	NA

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Dir Lower Male SSTs Regularization order SSTs -2018

1000	Asst. Dir	Khyber Post Dir Lower CNIC No. 170010255809	1000	Ch. Sec. & Dir.
1000	Asst. Dir	Village And Post Office Badayan Ichril Agency Lower Dir CNIC No. 17002	1000	GHSS Asbani

**TERMS & CONDITIONS**

1. 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.
2. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, 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 elder in age shall rank senior to the younger one.

(Farid Ahmad Khattak)

Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Dir Lower Male SSTs Regularization order SSTs -2018

18

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4/64-11

Endst. No. / File No. 17/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) Charsadda.
4. District Accounts Officer Charsadda.
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 (E&SE)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Handwritten initials and date: 27/3/18



**UNIVERSITY OF MALAKAND  
PAKISTAN**

**DETAILED MARKS CERTIFICATE**

BS (Hons) Computer Science 4 Years

Department of Computer Science & IT  
Session (2004-2008)

Name: NIAZ AHMAD

F/Name: BAKHTIAR AHMAD

Reg. No: Z0040010009

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Subjects	Maximum Marks	Credit Hours	Marks Obtained			
			Internal	Theory	Practical	Total
Functional English	50	2		31		31
Fundamental of Computer	100	3	16	33	15	64
Islamiyat	50	2		42		42
Statistics	100	3	17	50		67
Mathematics	100	3	17	52		69
1st Term Examination February 2005 Roll No: 9			Total Marks: 400		Result Date: April 27, 2005	Obtained Marks: 273
Pak Studies	50	2		32		32
Programming Concepts	100	4	17	43	15	75
Physics	100	3	09	57		66
Mathematics-II	100	4	17	62		79
Discrete Maths	100	4	19	66		85
2nd Term Supply Examination December 2005 Roll No: 9			Total Marks: 450		Result Date: Jan 21, 2006	Obtained Marks: 337
Programming Language-I (C++)	100	4	18	32	17	67
Data Structure	100	4	15	33	17	65
Business Communication	50	3		37		37
Digital Logic Design	100	4	17	38		55
Electronics	100	3	17	38		55
3rd Term Examination February 2006 Roll No: 9			Total Marks: 450		Result Date: April 22, 2006	Obtained Marks: 279
Computer Organization & Assembly Language	100	4	15	30	15	60
Operating System	100	4	18	31	18	67
Database-I	100	4	19	40	18	77
Visual C++	100	4	16	50	18	84
4th Term Examination July 2006 Roll No: 9			Total Marks: 400		Result Date: Oct 19, 2006	Obtained Marks: 288
Programming Language-II (Java)	100	4	16	32	14	62
Data Communication & Networks	100	4	17	32	14	63
Artificial Intelligence	100	4	12	39	14	65
Software Engineering-I	100	4	18	46	16	80
5th Term Examination February 2007 Roll No: 9			Total Marks: 400		Result Date: April 18, 2007	Obtained Marks: 270
Network Design	100	4	12	30	18	60
Database-II	100	4	18	36	19	73
Automata Theory	100	3	14	38	16	68
Computer Architecture	100	4	18	46	18	82
Numerical Analysis	100	4	15	64		79
6th Term Examination August 2007 Roll No: 1608			Total Marks: 500		Result Date: Oct 12, 2007	Obtained Marks: 362
Object Oriented Analysis & Design	100	3	16	33	16	65
Internet Programming	100	4	17	36	17	70
Software Engineering-II	100	4	17	40	18	75
Computer Graphics	100	3	15	41	17	73
Design & Analysis of Algorithms	100	3	18	44	17	79
7th Term Examination March 2008 Roll No: 768			Total Marks: 500		Result Date: May 19, 2008	Obtained Marks: 362
Compiler	100	4	17	49	15	81
Network Strategies	100	4	16	51	15	82
Software Project Management	100	3	19	53	16	88
Research Thesis (Software Project)	100	4		85		85
8th Annual Examination August 2008 Roll No: 808			Total Marks: 400		Result Date: Jan 14, 2009	Obtained Marks: 336
Total Result Status:		Maximum Marks	5500	Obtained Marks		2507

Total Result Status:

Maximum Marks 5500

Obtained Marks 2507

Overall Percentage: 45.58

Total Credit Hours: 133

Errors and omissions are subject to subsequent rectification

Prepared by: *[Signature]*

Checked by: *[Signature]*

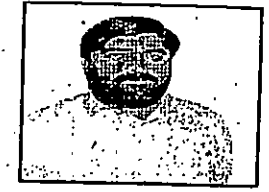
Attested by: *[Signature]*  
Controller of Examinations  
University of Malakand

Attested by: *[Signature]*  
Munir Farooq Sadiqi  
SST (Sc) G.H.S Ouch  
Sharqi Dir (L)

15



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



<b>Student's Name</b>	Niaz Ahmad	<b>Father's Name</b>	Bakhtiar Ahmad
<b>Program/Session</b>	M.Phil Computer Science, Session 2014-2016	<b>Registration No.</b>	20040010009

MPhil Course Work											
S.No	Semester	Course Code	Course Title	Cr. Hrs.	Total Marks	Marks Obtained	Percentage	GP	GPA	Remarks	
1	1st	CS 907	Advanced Computer Architecture	3	100	65	65	7.5	3.13	PROMOTED	
2		CS 903	Research Methodology	3	100	75	75	10.5			
3		CS 701	Advanced Operating Systems	3	100	74	74	9.0			
4		CS 702	Advanced Algorithm Analysis	3	100	79	79	10.5			
<b>Sub-total</b>				12	400	293	73.25	37.5			
5	2nd	CS 901	Advanced Data Analysis	3	100	89	89	12.0	3.50	PROMOTED	
6		CS 926	Digital Image Processing	3	100	84	84	12.0			
7		CS 927	Medical Imaging	3	100	77	77	10.5			
8		CS 908	Theory of Computation	3	100	68	68	7.5			
<b>Sub-total</b>				12	400	318	79.5	42.0			
9	3rd & 4th	Research An Image Processing-Based Algorithm for Recognizing Leaf-Related Tomato Diseases		Successfully Completed							PASSED
<b>Over all results status</b>				<b>COMPLETED</b>							
<b>Total Points</b>				79.5							
<b>Total Cr. Hrs</b>				24+18=42							
<b>CGPA out of (4.0)</b>				3.31							

Errors and Omissions are subject to subsequent rectification.

Prepared By: Fabeem Khan  
Date of Issue: 28-01-2019

M.Phil/Ph.D. Coordinator  
 Deptt. of CS & IT  
 University of Malakand

Chairman

CHAIRMAN  
 Department of CS & IT  
 University of Malakand



# SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

## TRANSCRIPT

Transcript No. SU/ 17429

16

Name: Niaz Ahmad  
 Father's Name: Bakhtiar Ahmad  
 Degree: Bachelor of Education  
 Faculty: Arts, Social Sciences and Education

Reg. No: SUCR-11-02-025-0031  
 Roll No: 11-SP-80031  
 Enrollment Date: 09 Mar, 2011  
 Completion Date: 14 Apr, 2012

1st Semester	Cr Hrs	Marks	Grade	GPs	Remarks
SBE 301 Perspective of Education in Pakistan	3 - 0	84	C	6	
SBE 302 School Organization and Classroom Management	3 - 0	73	B	9	
SBE 303 Human Development and Learning	3 - 0	59	D+	4.5	
SBE 304 Curriculum and Instruction	3 - 0	64	C	6	
SBE 305 Computer Literacy	3 - 0	67	C+	7.5	
Cum Cr: 15.0 GPA: 2.200 Cum GPA: 2.20 Status: FTD					

2nd Semester	Cr Hrs	Marks	Grade	GPs	Remarks
SBE 306 Functional English	3 - 0	63	C	6	
SBE 307 Educational Measurement and Evaluation	3 - 0	72	B	9	
SBE 308 Research Techniques and Individual Project	3 - 0	64	C	6	
SBE 311 Educational Technology	3 - 0	66	C+	7.5	
SBE 315 Teaching of English	3 - 0	67	C+	7.5	
SBE 316 Teaching Practice	0 - 6	144	B	18	
Cum Cr: 36.0 GPA: 2.571 Cum GPA: 2.42 Status: QFD					

Marks Obtained : 803 Total Marks : 1200 Overall Percentage : 66.92%

(Errors and omissions are subject to subsequent rectification)  
 END OF TRANSCRIPT

*[Signature]*  
 Dean

(Degree Completed)

*[Signature]*  
 Controller of Examinations

Attested  
*[Signature]*  
 Mujahid Farooq Sadiqi  
 SST (Sc) G.N.S Ouch  
 Sharqi Dir (L)



# SARHAD UNIVERSITY

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

## TRANSCRIPT

(17)

Transcript No. SU/ 37680

Name: Niaz Ahmad

Reg. No: SUCR-15-02-036-0051

Father's Name: Bakhtiar Ahmad

Roll No: 15-SP-79882

Degree: Master of Education

Enrollment Date: 30 Mar, 2015

Faculty: Arts, Social Sciences and Education

Completion Date: 05 May, 2016

**1st Semester (Spring - 2015)**

SME	Cr Hrs	Marks	Grade	GPs	Remarks
626 Comparative Education	3 - 0	84	B+	10.5	
627 Computers in Education	3 - 0	63	C	6	
628 Educational Research	3 - 0	75	B	9	
629 Advance Educational Psychology	3 - 0	78	B+	10.5	
630 Guidance and Counselling	3 - 0	77	B	9	

Cum Cr: 15.0 GPA: 3.000 Cum GPA: 3.00 Status: PTD

**2nd Semester (Fall - 2015)**

SME	Cr Hrs	Marks	Grade	GPs	Remarks
632 Education in Pakistan: Problems Issues & Trends	3 - 0	86	A	12	
633 Curriculum Development and Implementation	3 - 0	75	B	9	
635 Teacher Education in Pakistan	3 - 0	84	B+	10.5	
638 Higher Education	3 - 0	72	B	9	
651 Secondary Education	3 - 0	76	B	9	
653 Teaching Strategies	3 - 0	71	B	9	
654 Economics of Education	3 - 0	66	C+	7.5	

Cum Cr: 36.0 GPA: 3.143 Cum GPA: 3.08 Status: QFD

Marks Obtained : 987 Total Marks : 1200 Overall Percentage : 75.58%

(Errors and omissions are subject to subsequent rectification)  
END OF TRANSCRIPT

*[Signature]*  
Dean

(Degree Completed)

*[Signature]*  
Controller of Examinations

Attested  
*[Signature]*  
Majana Farooq Sadiqi  
SST (Sc) G.H.S. Ouch  
Sharaq Dir (L)

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# UNIVERSITY OF MALAKAND PAKISTAN

Serial No. BS/CS/009A

This Degree of  
**Bachelor of Science (Honours)**  
In  
**Computer Science**  
Is Awarded to

*Mr/Ms*      **NIAZ AHMAD** *Son/Daughter of*      **BAKHTIAR AHMAD**

*Student of*      **DEPARTMENT OF COMPUTER SCIENCE & I.T**

*Having passed the prescribed examination held in*      **AUGUST, 2008**

*Session*      **2004-2008** *Registration No*      **20040010009** *Roll No.*      **808**

*Division*      **FIRST**

*Issuance Date*      **SEPTEMBER 04, 2009**

RESULT DECLARED ON: JUNE 14, 2009

*Controller of Examinations*  
    

*Registrar*  
    

*Attested*  
      
Mujahid Farooq Sadiqi  
SST (Sc) G.H.S Ouch  
Sharqi Dir (L)

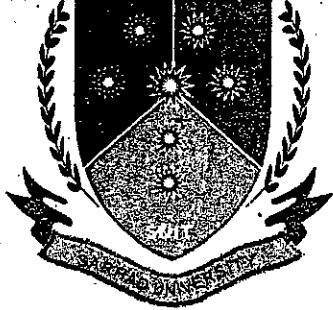
*Countersigned*

      
*Vice Chancellor*

19

Registration No. SUCR-11-02-025-0031

Serial No. 008369



# Sarhad University of Science & Information Technology


This is to certify that Niaz Ahmad son/daughter of Bakhtiar Ahmad

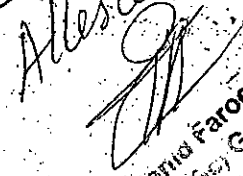
Having passed the requisite examination, is hereby awarded the degree of


## Bachelor of Education

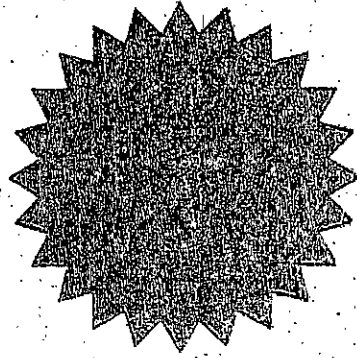
With all the rights and privileges appertaining thereto.

Given at Peshawar (PAKISTAN) on the Twentieth Day of April Two Thousand Twelve

  
Registrar

Attested  
  
Mujana Farooq  
SST (Secy) G.H.S.C.  
Sharqi Dir (C)

  
Vice Chancellor



  
President





Peshawar, dated the 24<sup>th</sup> 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)	<p>i. At least second class Master's Degree or four years BS Degree in the relevant subject; and</p> <p>ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.</p>	23 to 35 years	<p>(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.</p> <p>Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial</p>

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

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

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

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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;

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

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

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

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

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

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

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

Provided that if no suitable candidate is available from amongst

(23)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst: of even No & date:

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

  
ZAMIN KHAN MOMANI  
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

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

The following attended the meeting:-

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

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

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

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

No.	Nomenclature of the post	Minimum Qualification for appointment by initial recruitment or by transfer.	Age Limit	Method of recruitment
1.	Subject Specialist-Information Technology (SS-IT) (B-17) Government Higher Secondary Schools/ Govt. comprehensive High Schools and other equivalent posts in the Teaching Cadre.	i.) Master Degree in Computer Science/IT at least in 2 <sup>nd</sup> Division or equivalent qualification from any recognized University. ii.) Bachelor Degree of Education (B.Ed) at least in 2 <sup>nd</sup> 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 <b>AND</b> 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 <sup>nd</sup> Division or equivalent Qualification from any recognized institution. ii). Bachelor Degree of Education (B. Ed) at least in 2 <sup>nd</sup> 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.

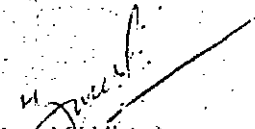



**Decisions:**


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.

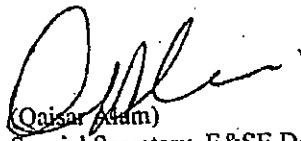
  
 (Jayed Siddique)  
 Deputy Secretary (R), Finance Department


  
 (Mobsin 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 Adam)  
 Special Secretary, E&SE Deptt:

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

29

"D"

To,

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

Through: The Director  
E & SE Department  
K.P.K.

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

Respect Sir,

that we i.e (Atiqur Rahman, Muhib Ullah, Barkat Ullah,  
Ali Akbar, Ghazan Ullah, Aftab Ullah, Gayyoon Khan, Gohar Zaman, Muhammad Ahsan,  
Khan Ullah, Arshad Ali Khan, Muzaffar Said, Niaz Ahmad, Mujahid Farooq, Saadiq,  
Hussain Rehman, Fazli Bavi & Rafiq Ahmad Khan)

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

With most veneration it is to bring in your kind notice that  
50% quota has already been allotted for S.S.Ts (Gen/Sc) in the  
different subjects for Subject Specialist Post but unfortunately,  
S.S.T (Gen/Sc) who have M.S (Computer Science) / B.S (CS) / M.IT  
qualifications & are eligible for promotion to the Post of S.S.(IT)  
B.S-17 have no quota for promotion.

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

-27A

Quota for promotion to the Post of SS (IT) BPS-17 like other SSts, so as to bring uniformity in teaching Cadre.

in the SSRC meeting on 02/02/2018 E&SE Deptt. may be given 20% quota for Promotion.

Now according to the SSRC meeting on 10/08/2017 & on 02/01/2018 the quota should be properly notified.

Thanks

Dated: 13/09/2018

① Atiqur Rehman

DS (Admn)

② Mubib Ullah

etc.

(Recd.)  
Dated 13/9/2018

13/9/18

30

"E"

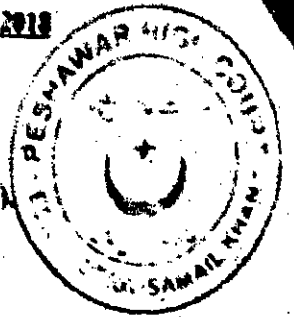
**JUDGMENT SHEET**  
**IN THE PESHAWAR HIGH COURT, D.I. KHAN BENCH**  
*(Civil Department)*

**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 Awar Awan Advocate

For respondents:

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

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

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

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

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."

ADMITTED  
22-02  
EXAMINOR  
Jushwar High Co.  
D.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 consisting terms and conditions of their service, or any ground whatever.

3. Accordingly, for the reasons stated above, this petition is not maintainable and is dismissed alongwith enlisted C.Ms and interest 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.  
(initials)

JUDGE

JUDGE

(30)  
Hon'ble Mr. Justice S.M. Anwar Shah  
Hon'ble Mr. Justice Shaukat Ali

off  
12/2

G.R. No. 557  
Applicant: Received on 12-02-19  
Copies: 2  
No of Pages: 05 Page  
Copies to: 04  
Urgent Fee: 200/-  
Total Fee: 200/-  
Copy ready for issue: 12-02-19  
Copy deliv. recd. on: 12-02-19  
Signature of C.A. No. 12-02-19

Committed to the State Court  
12-02-19  
Registrar High Court Branch 01  
Lahore

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



- 1. Abdul Abud R/O Ghulam Muhammad S/O Abud 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) chodwan 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 R/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 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 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).

*Handwritten signature/initials*

VERSUS

EXAMINOR  
Peshawar High Court  
D.I.Khan

1. Govt of Khyber Pakhtunkhwa through Secretary (Ed/M) 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&SE) 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 24<sup>th</sup> 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 2<sup>nd</sup> 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

ATTENDED  
 14-02-19  
 EXAMINOR  
 Peshawar High Court  
 D.J. Khan



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

APPEAL NO: \_\_\_\_\_ OF 20\_\_

Niaz Ahmad.

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

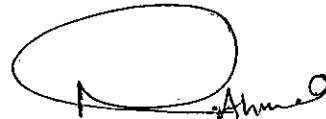
Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Appellant

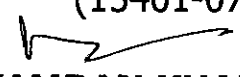
Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 17/1/2023

  
**CLIENT** - Niaz Ahmad

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**  
(BC-10-0853)  
(15401-0705985-5)

  
**KAMRAN KHAN, Mujeeb-ur-Rehman Mandukhel**

  
**UMAR FAROOQ MOHMAND**

  
**WALEED ADNAN**

&

  
**MUHAMMAD AYUB**  
**ADVOCATES**

**OFFICE:**

Flat No. (TF) 291-292 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)

# بعدالت سروس ٹریبونل عمیر ایگزٹران ایجوکیشن

2ء مخائب اعلیٰ فرد  
بنام حکومت  
نہایت

سروس ایبل

موزعہ  
مقدمہ  
دعویٰ  
جہم

باعث تحریر آئنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آن مقام سروس ٹریبونل کیلئے سروس ایبل کے اصرار و درخواستوں کے اعلان کی صورت  
 مقرر کر کے اتر لکھنا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقریر نمائتہ فیصلہ بر حلقہ دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ از عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا ایبل کی برادگی اور منسوخ  
 نیز دائر کرنے ایبل 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 کبھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے 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 لکھد یا کہ سندر ہے۔

الترتوم ۶۷  
ماہ جولائی 2014

کے لئے منظور ہے۔  
 Ahsanul  
 9/11/2014

سروس ٹریبونل مقام

سروس ٹریبونل

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

C.M No. \_\_\_\_\_/2020

In

Service Appeal No. ~~1015~~/2019

Niaz Ahmad.....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.

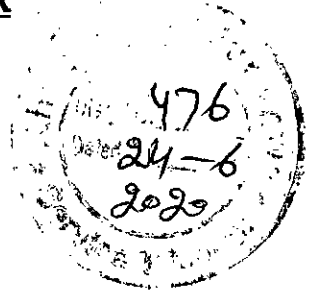
It is therefore, respectfully prayed that on acceptance of this application the above titled case may kindly be fixed at earliest to meet the ends of justice.

Petitioners

Through

*12*  
**Saadat Ullah Khan Tangi**  
Advocate High Court  
Peshawar  
Cell#0331-5030566

Dated:-23.06.2020



*Shall remain posted  
to the date already fixed.*  
*24/6*

D

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

C.M No. \_\_\_\_/2020

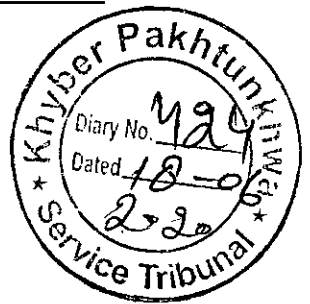
In

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

Niaz Ahmad.....Petitioner

**Vs**

Govt of KPK & Others.....Respondents



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

*put up to the court*  
*Respectfully Sheweth:-*

*Reader* The petitioner humbly submits as under:-

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

**GROUND:-**

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

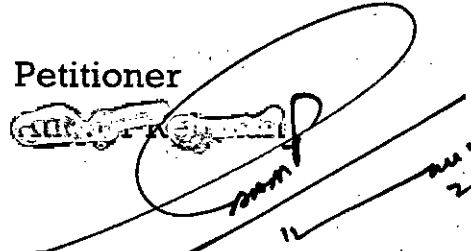
②

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

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

Through

Petitioner

  
**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. \_\_\_\_/\_\_\_\_

Niaz Ahmad.....Petitioner

**Vs**

Govt of KPK & Others.....Respondents

**AFFIDAVIT**

I, Niaz Ahmad S/O Barkat Ahmad (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.

*Niaz Ahmad*  
DEPONENT

QURAN  
QURAN

Identified by

*Saadat Ullah Khan Tangi*

**Saadat Ullah Khan Tangi**

Advocate High Court

Peshawar

*Khalid Mahmood*  
16-6-2020  
KHALID MAHMOOD  
ATTORNEY AT LAW  
ADVOCATE  
PUBLIC  
PESHAWAR HIGH COURT



Directorate of Elementary & Secondary Education Khyber  
Pakhtunkhwa

No. 379-12 SS (IT) Promotions

Dated Peshawar the: 8/6/2020

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To

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

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

Memo:

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

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

Note: - the relevant documents will be consisting of:

1. Bio Data/CNIC
2. 1<sup>st</sup> 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 1<sup>st</sup> app: till 2019) Synopsis / ACRs should be submitted in separate file and documents in separate file, ACR and synopsis should be handed over with the conveying letter from concerned D.E.O to ACR brach.
10. All certificate/degrees with DMCs (duly attested)
11. Domicile.
12. Information as per format referred to the above may be provided in hard.
13. Applications/Documents/ information should be reached to this directorate within (10) days after the issuance of this letter.
14. Candidates having 3<sup>rd</sup> 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