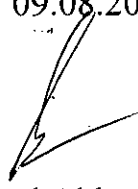


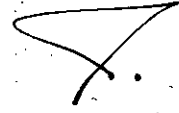
18.05.2023

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)

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)

SCANNED
Peshi
kamranullah


SCANNED
Peshi
KaleemUllah


S.A No. 1617/2019

17.02.2023

Mr. Noor Muhammad Khattak, Advocate for the appellant present and submitted fresh Wakalatnama which is placed on file. 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 been freshly engaged and has not made preparation 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)

2nd 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
KPT
Peshawar


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

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 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 14.04.2022 for the same as before.

Reader

30.12.2020

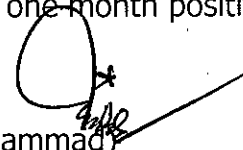
Due to summer vacation, case is adjourned to 17.3.2021 for the same as before.


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.

10.09.2021

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

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


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

28.10.2020

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



Reader

13.04.2020

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


Reader

07.07.2020

Counsel for the appellant present.

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


Member (J)

13.08.2020

Counsel for the appellant present. Nemo for the respondents.

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


Chairman

03.01.2020

Appellant present in person.

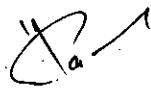
On the strength of admitting note dated 04.12.2019 handed down in Service Appeal No. 1058/2019, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 27.01.2020 before S.B.

Appellant Deposited
Security & Process Fee
Bill


Chairman

27.01.2020

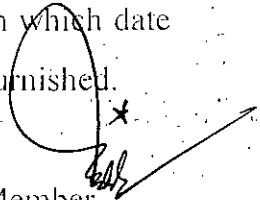
Clerk to counsel for the appellant present. Written reply not submitted. Irfan Assistant representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 04.03.2020 before S.B.


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.

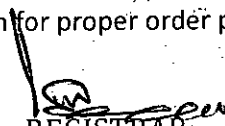


Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1626/2019


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. Gohar Zaman 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>
2-	04/12/19	<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>

The appeal of Mr. Ali Akbar Khan son of Shamshi Khan SST GHS Bela District Upper Dir received today i.e. on 29-07.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

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

No. 1338 /S.T.

Dt. 31-7- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Saadatullah Khan Tangi Adv. Pesh.

Objection no.4 and 5 are still stand therefore, the appeal in hand is returned ^{again} to the counsel for the appellant for completion and resubmission within 15 days. 27/8/19


No. 1491 /S.T.

Dt. 23/8- /2019.

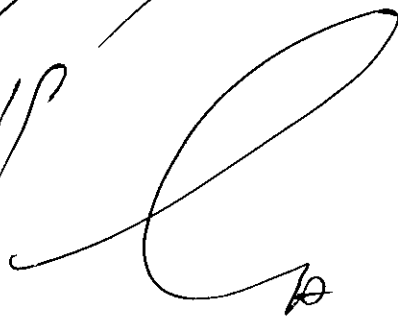

REGISTRAR

Mr.Saadatullah Khan Adv. Pesh.

Sir! Name of present appellant is mentioned
in departmental appeal available at Page 30.
More over w.p referred in appeal has been filed
by other colleagues of appellant, the appellant case
being identical, judgement in w.p is applicable
to the case of appellant. Re-submitted
Kindly fix 30/9/19 in the instant case as identical
cases are fixed for the referred date.


" " "
30.8.19.

~~Sir, Re-submitted after completion
the same may kindly be clubbed with
case title "Ghulam Abbas vs Govt"
fixed for 30.9.19~~



30.9.19

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 1622 /2019

Ali Akbar Khan **Appellant**

Versus

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

I N D E X

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	7A-20
5.	Copy of Notification dt.24.07.2014	B	21-26
6.	Copy of minutes of the meeting	C	27-29
7.	Copies of departmental Appeal and Writ Petition	D & E	30-35
8.	Wakalatnama		36

Appellant
Through


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

Dated 18.07.2019

1

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 1622 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1080

Dated 29-7-2019

Ali Akbar Khan S/o Shamshi Khan
Appointed as SST, GHS Bela,
District Upper 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

.....**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)

Filed to-day

Registrar

29/7/19

Re-submitted to-day
and filed.

Registrar

3/12/19

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 01.12.2015. (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

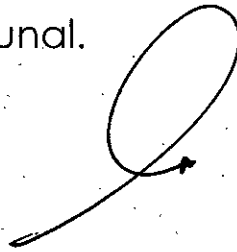

Appellant

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

Ali Akbar Khan **Appellant**

Versus

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

AFFIDAVIT

I, Ali Akbar Khan S/o Shamshi Khan Appointed as SST, GHS Bela, District Upper 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

Ali Akbar Khan
DEPONENT

CNIC#: 15701-9078517-3.

07 AUG 2019

ATTESTED



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2019

Ali Akbar Khan **Appellant**

Versus

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

ADDRESSES OF PARTIES

APPELLANT:

Ali Akbar Khan S/o Shamshi Khan
Appointed as SST, GHS Bela,
District Upper 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

Dr Upper Male Appointment Order SST Adhoc 1

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail rafiq.kk851@yahoo.com



APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School based in BPS-16 (Rs. 12910-1035-43960) @ Rs. 12910/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge.

(SST Bio Chem)

Sr	Roll No	Name	Address	Head mark (out of 100)	NTS mark (out of 100)	Total marks (out of 200)	School
1	79101	Abdul Haseeb	Village War Payeen Tehsil And District War, CNIC No. 15702-1448599-9	71.48	59	130	GHS Sperko
2	7910039	Sikhar Anyun	Village Chumrah Kajan And Tehsil Upper Dir CNIC No. 15701-1716301-9	70.58	58	129	GHS Karkoi
3	4510317	Muhammad Shuaib	Fujiabad Post Office Dagal Tehsil And District Jordan CNIC No. 16101-0989745-7	66.33	61	127	GHS Bela
4	6010131	Salim Ullah Peshawar	Room Number 190 Hostel Number 01 University Of CNIC No. 15702-8470281-1	62.74	59	122	GHS Thak

(SST Maths Phy)

Sr	Roll No	Name	Address	Academic mark (out of 100)	NTS mark (out of 100)	Total marks (out of 200)	School
1	7920011	Mukhtar Ud Din	Opposite To Pso Pump Upper Dir CNIC No. 15701-0529969-9	74.17	64	138.17	GHS Kehakoi
2	7920016	Muhammad Niaz Khan	Dir College Of Science And Education Village Dir CNIC No. 15701-6721563-9	67.1	66	133.1	GHS Chugyatin
3	7920055	Umar Farooq	Village Michkaly Post Office Chukiatan Tehsil And District Upper Dir CNIC No. 15701-9829605-7	62.57	70	132.57	GHS Paokakaly
4	4520391	Javid Ur Rahman	Village And Tehsil And Post Office War District Upper Dir CNIC No. 15702-5697809-9	65.03	63	128.03	GHS Farak
5	7920043	All Akbar Khan	Darara Mstallah Shari Abad District Upper Dir CNIC No. 15701-9028513-3	62.91	65	127.91	GHS Bela
6	7920025	Amwar Ullah	Village Umrat Payeen Tehsil And Post Office War District Upper Dir CNIC No. 15702-9888832-9	60.8	67	127.8	GHS Sperko

M. Akbar Khan
Barakatullah

7-A

7-B

Dir Upper Male Appointment Order SST Adhoc 2

7	7920069	Imran Khan	Wari Daskor Payeen CNIC No. 16102-3283056-3	59.56	64	123.56	GHS Gandigar
8	4520445	Amin Khan	Village And Post Office Qazi Abad Kallang Road Mardan Road Mardan. CNIC No. 16101-8737096-5	57.08	66	123.08	GHS Barikot
9	7920051	Zia Ullah	Tameer I Wattan Model School And College Wari Dir Upper CNIC No. 15702-4694431-1	67.12	55	122.12	GHS Patrak
10	7920017	Darakhill ah	Village And Post Office Darora District Upper Dir Kuleem Book Seller Main Bazar Darora CNIC No. 15701-9488169-7	61.99	59	120.99	GHS Swani
11	4520262	Ata Ur Rahman	Village Jan Khan Kiilli Post Office Takht Bhai Mardan Takht Bhai CNIC No. 16102-8178581-5	64.78	56	120.78	GHS Thal
12	7920039	Muhammad Ishfaq	Village Scratat P/O Chukyatan CNIC No. 15701-7267964-5	58.43	60	118.43	GHS Ganshall

(SST General)

Sr	RollNo	Name	Address	Academ to Marks (out of 100)	NTS Mar ks (out of 100)	Total Marks (out of 200)	School
1	7930062	Noorullah	Village Lumunda Karodara Tehsil Wari Post Office Akhagram CNIC No. 15702-0506700-9	61.02	77	138.02	GHS Pachakaly
2	7930066	Hazrat Wahab	Village Mano Bando Post Office Bibiyawar Tehsil And District Dir Upper CNIC No. 15701-8164289-3	64	74	138	GMS Siasan
3	7930362	Abdullah	Mohaluh Qusmaqi Vilalge Katan Payaeen Post Office Dgorar Tehsil Upper Dir District Upper Dir CNIC No. 15701-5496092-9	55.47	79	134.47	GHS Belo
4	7830070	Muhammad Alan	Tipu Shahced School And College Gul Jaba Kabal Swat, CNIC No. 15702-1982148-1	57.04	77	134.04	GMS Sunnai

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 1st December, 2015 to 30th Nov, 2016.
4. She should not be handed over charge if she exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His/her services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his/her certificates are verified.
8. He/She should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, his/her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He/she will be governed by such rules and regulations as may be issued from time to time by the Govt.

7-C

Dir Upper Male Appointment Order SST Adhoc 3


11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be preceded under the rules framed from time to time.
12. His/her appointment is made on School based, He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

3987-93

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No.2/A-14/SST/Adhoc/Appt: Dated Peshawar the 30 /11/2015.

- 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 Officers Concerned
 4. District Accounts Officer Concerned
 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



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

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468

Fax 091-9210936

E-mail rafiq_kk851@yahoo.com

APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem), (SST Maths Phy), (SST General) School based in BPS-16 (Rs. 12910-1035-43960) @ Rs. 12910/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge.

(SST Bio Chem)

Sr	RollNo	Name	Address	Academic Marks [out of 100]	NTS Marks [out of 100]	Total Marks [out of 200]	School
1	7910101	Abdul Haseeb	Village Wari Payeen Tehsil And District Wari, CNIC No. 15702-1448599-9	71.48	59	130	GHS Sperko
2	7910039	Iftikhar Anjum	Village Chumrah Katan Payeen Po Darora District And Tehsil Upper Dir CNIC No. 15701-1716301-9	70.58	58	129	GHSS Kalkot
3	4510317	Muhammad Shuaib	Fanjil Abad Post Office Dagai Tehsil And District Mardan CNIC No. 16101-0989745-7	66.33	61	127	GHS Bela
4	6010131	Salim Ullah	Room Number 190 Hostel Number 01 University Of Peshawar CNIC No. 15702-8470281-1	62.74	59	122	GHS Thall

(SST Maths Phy)

ATTESTED

Sr	RollNo	Name	Address	Academic Marks [out of 100]	NTS Marks [out of 100]	Total Marks [out of 200]	School
1	7920011	Mukhtiar Ud Din	Allama Iqbal Model School Opposite To Pso Pump Upper Dir CNIC No. 15701-0525969-9	74.17	64	138.17	GHS Rehankot
2	7920016	Muhammad Nawaz Khan	Dir College Of Science And Education, Village Dir CNIC No. 15701-6721563-9	67.1	66	133.1	GHS Chukyotin
3	7920055	Umar Farooq	Village Hichkalay Post Office Chukiayan Tehsil And District Upper Dir CNIC No. 15701-9829605-7	62.57	70	132.57	GHS Pachakaly
4	4520391	Javid Ur Rahman	Village And Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-5697809-9	65.03	63	128.03	GHS Patrak
5	7920043	Ali Akbar Khan	District Upper Dir Tehsil Dir Uc Darora Mohallah Shari Abad District Upper Dir CNIC No. 15701-9078517-3	62.91	65	127.91	GHS Bela
6	7920025	Anwar Ullah	Village Umralai Payeen Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-9888832-9	60.8	67	127.8	GHS Sperko

Dir Upper Male Appointment Order SST Adhoc 2

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	7920069	Imran Khan	Wari Daskor Payeen CNIC No. 16102-3283956-3	59.56	64	123.56	GHSS Gandigar
8	4520445	Amin Khan	Village And Post Office Qazi Abad Kallang Road Mardan Kallang Road Mardan. CNIC No. 16101-8737096-5	57.08	66	123.08	GHS Barikot
9	7920051	Zia Ullah	Tameer I Wattan Model School And College Wari Dir Upper CNIC No. 15702-4694431-1	67.12	55	122.12	GHS Patrak
10	7920017	Barkatullah	Village And Post Office Darora District Upper Dir Kolean Book Seller Main Bazar Darora CNIC No. 15701-9488169-7	61.99	59	120.99	GHS Swani
11	4520262	Ata Ur Rahman	Village Jan Khan Kiilli Post Office Takht Bhai Mardan Takht Bhai CNIC No. 16102-8178581-5	64.78	56	120.78	GHS Thall
12	7920039	Muhammad Ishfaq	Village Seratai P/O Chukyatan CNIC No. 15701-7267964-5	58.43	60	118.43	GHS Ganshall

(SST General)

Sr	Roll No	Name	Address	Academic Marks (out of 100)	NTS Marks (out of 100)	Total Marks (out of 200)	School
1	7930062	Noorullah	Village Lumnda Karodara Tehsil Wari Post Office Akhagram CNIC No. 15702-0506700-9	61.02	77	138.02	GHS Pachakaly
2	7930066	Hazrat Wahab	Village Mana Bando Post Office Bibywar Tehsil And District Dir Upper CNIC No. 15701-8164289-3	64	74	138	GMS Siasan
3	7930362	Abdullah	Mahalah Qasmaqi Vilalge Katan Payeen Post Office Dgorar Teshil Upper Dir District Upper Dir CNIC No. 15701-5496092-9	55.47	79	134.47	GHS Bela
4	7830070	Muhammad Alam	Tipu Shaheed School And College Gul Jaba Kabal Swat, CNIC No. 15702-1982148-1	57.04	77	134.04	GMS Sunnai

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year wef 1st December, 2015 to 30th Nov, 2016.
4. She should not be handed over charge if she exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. His/her services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO (concerned) is issued that his/her certificates are verified.
8. He/She should join his post within 10 days of the issuance of this notification. In case of failure to join the post within 10 days of the issuance of this notification, his/her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. He/she will be governed by such rules and regulations as may be issued from time to time by the Govt.

ATTESTED

Dir Upper Male Appointment Order SST Adhoc 3


- 11. His/her services shall be terminated at any time, in case his performance is found unsatisfactory during his/her contract period. In case of misconduct, he/she shall be preceded under the rules framed from time to time.
- 12. His/her appointment is made on School based, He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.
- 13. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

3987-93

(Muhammad Rafiq Khattak)
 Director
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No.2/A-14/SST/Adhoc/Apptt: Dated Peshawar the 30 /11/2015.

- 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 Officers Concerned
 - 4. District Accounts Officer Concerned
 - 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

ATTESTED

DESLM)
Dir Upper

Ragd.

Dir Upper Male SSTs Regularization order-2018

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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) ERSED/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 HPS-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
1	Hajrat Khan	Mohalla Landi Shah Lower Village And Post Office Barara. CNIC No 15701-5066809-3	132.56	GHS Gumbri	2068-75 dated 30-04-2014	4913-20 dated 28-01-2017
2	Wahed Ullah	Village Kustin Dahari Post Office Shukoor Tehsil Tangi District Charsadda CNIC No 17102-5696051-1	128.82	GHS Mian Darg	-do-	-do-
3	Imam Rahim	Village And Post Office Almas Mohallah Dak District Dir Upper CNIC No 15701-8508150-9	127.77	GHS Samkhat	-do-	-do-
4	Muhammad Raza	Village Qasbi Tehsil And Post Office Wari District Upper Dir CNIC No 15702-0908885-7	126.79	GHS Pacho Kolai	-do-	-do-
5	Ismaeil	Village And Post Office Chakotah District Dir Upper CNIC No 15701-0687477-7	125.92	GHS Bernrai	-do-	-do-
6	Latif Ur Rahman	Village Monabanda Post Office Bibyanar Distt And Tehsil Dir Upper CNIC No 15701-5479619-7	124.04	GHS Gandigar	-do-	-do-

2017

Sr#	Rollno	Name	Permanent Address	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
7	43100078	Badshah Hussain	Village Shawband Pa Wari Teh Wacdi District Upper Dir CNIC No. 15702-8805508-7	141.72	GHS Nehay	1873-84 dated 28-04-2007	NA
8	601001081	Umar Nasir	Village Batol Post Office Samkhat District Tehsil Upper Dir	133.79	GHS Usheri	-do-	NA

Advt(s)
Circulate to all Concern
19/4/19

Office of the EDC
1369
19.11.18

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Dir Upper Male SST's Regularization order-2018

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			CNIC No. 15701-8903050-5				
9	791000139	Ishfaq Ahmad	Village Qasimabad Osmani Tehsil And Post Office Wari District Dir Lower CNIC No. 15702-7119458-5	131.16	GHS Malunga	-do-	NA
10	791000080	Sharif Ullah	Village Matar Mahallah Cherhal Post Office And Tehsil Wari District Upper Dir CNIC No. 15702-3099814-9	130.23	GHS Jalgram	-do-	NA
11	791000125	Abdul Haseeb	Village Wari Payeen Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-1448599-9	129.49	GHS Wari	-do-	NA
12	791000071	Muhammad Ajmal Khan	Village Wari Post Office And Tehsil Wari District Upper Dir CNIC No. 15702-6862521-1	127.32	GHS Wari	-do-	NA
13	791000163	Hamid Zia	Village Jelar Post Office Wari Tehsil Wari District Dir Upper CNIC No. 15702-8726858-9	127.24	GHS Jelar	-do-	NA
14	451001101	Muhammad Shuaib	Fauji Abad Post Office Dngai Tehsil And District Murdan CNIC No. 16101-0089745-7	126.36	GHS Ganiseer	-do-	NA
15	791000062	Nasir Ahmad	Ahmad Public School And College Wari Dist Upper Dir CNIC No. 15702-6020389-1	126.26	GHS SS Khel	-do-	NA
16	601000978	Farman Ali	Afghan Colony Street #2 House No. 279 Tub Well Chawk Peshawar City CNIC # 17101-5080997-9	126.0	GHS Nehan	-do-	NA
17	791000089	Muhammad Shuhab	Village And Post Office Barawal Bandi District Dir Upper CNIC No. 15702-4700667-7	125.21	GHS Choukya ran	2983-89 dated 17-05-2017	NA
18	791000187	Khaista Rahman	Village Nagrail Post Office Sahab Abad Tehsil Wari Dir Upper CNIC No. 15702-6933856-3	123.87	GHS Barawal 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	121.64	GHS Patrak	-do-	NA
20	791000064	Badshah Sardar	District And Tehsil Upper Dir Post Office Bibyanwar Village Kafir District Upper Dir CNIC No. 15701-2314422-7	123.67	GCMS Dir	-do-	NA
21	791000058	Lal Rehman	Village Bibyanwar Dir Upper CNIC # 15701-5401207-7	123.52	GHS Ushara	2937-43 dated 31-07-2017	NA
22	791000153	Yassar Khan	Village & PO/Tehsil Wari District Dir Upper CNIC # 15702-5059950-9	123.10	GHS, Partrak	-do-	NA

SST Maths Physics 2014

Sr#	Name	Address	Score	Name of School	Appointment order No and dated	Extension order No and dated if any
1	Onyuan Khan	Village Qashqari Po Dir Upper District Lower Dir CNIC No 15701-5794832-1	119.4	GHS Sun Baki	208100 dated 30-04-2014	391320 dated 28-01-2017
2	Shanib	Mohallah Chumra Kattan Payeen Post Office Darara Upper Dir CNIC No 15701-6001826-1	114.65	GHS Usharif	-do-	-do-

ATTESTED

MLC

Dir Upper Male SSTs Regularization order-2018

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2015

Sr#	RollNo	Name	Address	Total Marks (out of 200)	School/remarks	Appointment order No and dated	Extension order No and dated if any
3	7920010	Muhammad Nawaz Khan	Village Darara District Dir Upper CNIC No. 15701-6721303-9	120.1	GHS Chukhatan	3987-93 dated 30-11-2015	3987-93 dated 30-11-2015
4	7920043	Ali Akbar Khan	District Upper Dir Tehsil Dir Ue Darara Mohallah Shari Abad District Upper Dir CNIC No. 15701-9078512-3	127.91	GHS Bela	-do-	-do-
5	7920025	Anwar Ullah	Village Umraili Pajeen Tehsil And Post Office Wari District Upper Dir CNIC No. 15702-6889832-9	127.8	GHS Sperko	-do-	-do-
6	7920069	Imran Khan	Village, Tehsil Wari District Dir Upper CNIC No. 16102-3283056-3	123.56	GHS Gandig. ar	-do-	-do-
7	7920039	Muhammad Istiaq	Village Seratal District Dir Upper CNIC No. 15701-7267064-5	118.43	GHS Ganshal	-do-	-do-

2017

Sr#	RollNo	Name	Permanent Address	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
8	7920000 80	Aliaf Ur Rahman	Village Jabar Post Office Gamseer Tehsil Dir District Dir Upper CNIC No. 15701-427487-5	136.62	GHS Gamseer	4878-84 dated 28-04-2017	NA
9	7920000 51	Umar Farooq	Village richkaiy Post Office Cukiatan Tehsil And Dir And District Dir Upper CNIC No 15701-6820805-7	131.95	GCMHS Dir	-do-	NA
10	8920000 97	Fazal Wahid	The Home Of Knowledge School And College Wari Upper Dir CNIC No 15702-6071164-5	124.70	GHS SS Khel	-do-	NA
11	6920000 39	Shuja Ur Rehman	Vill Sultan Post Office Sheringal District Dir (U) CNIC No 15701-0612701-7	124.32	GHS Daag (P)	-do-	NA
12	7920001 29	Shah Abdul Aziz	Vill Timrai Teh And Post Office CNIC No 15702-2406118-0	122.26	GHS Jatgram	-do-	NA
13	7920001 17	Aftah Uddin	Village Batal Usheri Darra District And Tehsil Upper Dir CNIC No. 15701-8457716-9	121.04	GHS Harawal Bandi	-do-	NA
14	7920001 86	Muhammad Tariq	Siem Collegiate School And College Khwaza Khela Siem CNIC No 17101-5201229-5	120.81	GHS Nehaq	-do-	NA
15	7920000 79	Zia Ullah	The Crescent Model School Wari Upper Dir CNIC No. 15702-4604131-1	120.73	GHS Wari	4004-10 dated 24-09-2017	NA
16	7920000 94	Ihsan Ullah Khan	Village Kakal Tie And Post Office Wari District Dir Upper CNIC No. 15702-6601145-9	118.99	GHS Wari	3557-64 dated 19-10-2017	NA
17	4520005 91	Muhammad Waseem	Village Biskand Po Usher Tehsil Dir District Upper Dir CNIC No. 15701-0402661-7	118.91	GHS Patrak	4878-84 dated 28-04-2017	NA
18	7920001 02	Zafar Khan	Village Begam P/O And Teh Wari CNIC No. 15702-1522805-5	117.99	GHS Bandal (P)	-do-	NA
19	8920002 94	Muhib Ullah	Village Sadiq Banda P/O Alamas Tehsil And District Upper Dir	117.80	GHS Darara	-do-	NA

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Dir Upper Male SST's Regularization order-2018

21	792000022	Muhammad Ishaq	CNIC No 15701-00001283-1 Village House and Tehsil And Post Office Ward Dist Upper Dir CNIC No 15701-00001283-1	117.81	GHS Jelar	do	NA
22	792000043	Hassan Uddin	Village Kattan Pargana Post Office Baran District Upper Dir CNIC No 15701-00001851-1	117.06	GHS Patras	do	NA
23	6120000506	Muhammad Anwar	Room Number 51 Hostel Number 03 Quaid E Azam University Of Islamabad CNIC No 15701-2994141-1	116.08	GHS Jelar	do	NA
24	792000025	Suhaib Ahmad	Mehallah District Upper Dir CNIC No 15701-5878700-0	115.58	GHS Usheri	do	NA
25	792000021	Usman Ullah	Department Of Agriculture Extension Dist Dir Lower CNIC No 15701-1169727-5	115.52	GHS Kair Darra	do	NA
26	792000046	Syed Fazal Ghani	Vill & PO Ganori Tehsil Dist Upper Dir CNIC No 15701-12120912-9	115.05	GHS Barawal Bandi	do	NA
27	792000073	Abdullah	Village Orpha Post Office Athayana District Upper Dir CNIC No 15701-151106-5	114.92	GHS Wari	do	NA
28	792000029	Maqbool Ali	Village And Post Office Ward Dir Upper Dir CNIC No 15701-5062908-3	100.88	GHS Hayugay (Sh)	do	NA

(SST General) 2014

Sr	Name	Address	Score	Name of School	Appointment order no and dated	Extension order no and dated if any
1	Muhammad Yaseen	Jamia Usmania, Usmania Colony, Nafth Road Peshawar Cantt, Peshawar CNIC No 15701-0100000-1	129.97	GHS Saur Dera	2008-91 dated 30-01-2014	2013-20 dated 29-01-2017
2	Imran	House No 2 Model Colony Post Office and Tehsil Tarni District CNIC No 15701-0000000-0	116.60	GHS Thum	do	do
3	Sohail	Village Rehmatel Tehsil And Post Office Dir District Upper Dir CNIC No 15701-6071667-5	125.98	GHS Dohanda	do	do
4	Hazrat Saif	Village Thail Mohallah Haji Shahi Tehsil And Post Office Kallar CNIC No 15701-0567455-3	123.16	GHS Sunder	do	do
5	Shahid Khan	Village Gomul Post Office And Tehsil Ward District Dir Upper Dir CNIC No 15701-5187170-9	132.12	GHS Saindhi	do	do
6	Shaukat Islam	House No 157 Sector D/1 Mirpur Ayk CNIC No 15701-1115177-2	131.19	GHS Dasta	do	do
7	Muhammad Faraz	7/1 Zahir Phosphate Alum House Dir Post Office Dir Tehsil Dir CNIC No 15701-1191180-3	131.13	GHS Bahawal	do	do
8	Hassan Ullah	House No 114 Sector G/1 Masjid Bahawal Alum East District Dir Tehsil Dir CNIC No 15701-016914-5	129.28	GHS Sector Sultana Bahawal	do	do
9	Muhammad Asrar	House No 1 Tehsil Post Office Dir Upper Alum District Dir Upper Alum Center CNIC No 15701-1212122-5	129.01	GHS Rukhan	do	do
10	Irfan Ullah	15701-0111111-1 CNIC No 15701-09811000-1	127.5	GHS Jambatti	do	do
11	Haleem Ullah	Village Hegar Kohistan District Dir Upper	126.49	GHS Bahawal	do	do

ATTESTED

Dir Upper Male SSTs Regularization order-2018

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		CNIC No 15703-8054529-3				
12	Zai Ullah	P/O Wari Tehsil Wari Village Wari Payeen Mullapur	126.03	GHS Bandai Osori	-do-	-do-

2015

Sr	RollNo	Name	Address	Academic Marks (out of 100)	School/re marks	Appointment order No and dated	Extension order No and dated if any
13	7930066	Hazrat Wahab	Village Mano Bando Post Office Bibywar Tehsil And District Dir Upper CNIC No.15701-8164289-3	64	GMS Siasan	-do-	-do-
14	7930362	Abdullah	Mohallah Qasmaqi Vilalge Katan Payaen Psot Office Dgorar Teshil Upper Dir District Upper Dir CNIC No. 15701-5496092-9	55.47	GHS Bela	-do-	-do-

2017

Sr	RollNo	Name	Permanent Address	Total Marks (Out of 200)	School	Appointment order No and dated	Extension order No and dated if any
15	793000435	Shaikat Ali	Village Gogyal Mohallah Gogyal Colony Tehsil And Post Office Wari CNIC No.15703-3434680-5	153.45	GMS Gandat	4878-83 dated 28-04-2017	NA
16	793000333	Muheeb Ullah	Post Office Box Tehsil Barawal Bandu District Dir Upper Mohallah Banglay Cham CNIC.No.15704-0981849-5	139.41	GMS Nasrat	-do-	NA
17	793000193	Fazal Hayat	Vill Jatgram Post Office Wari Tehsil Wari District Dir Upper Kpk CNIC No.15702-6126967-7	139.30	GHS Karkabari	-do-	NA
18	793000447	Hazrat Younas	Hazrat Younas S/O Shah Afzal Khun Village Goyal Post Office Tehsil Wari Distric Dir Upper CNIC No.15702-1620882-9	137.47	GHS Jelur	-do-	NA
19	793000724	Abdul Wahid	Village Haji Shai Tahsil P/O Kalkot Kir Uppper Kpk CNIC.No.15703-4832268-9	137.03	GHSS Patrak	-do-	NA
20	793000678	Irfan Ullah	Vill Bandai Teh And P/O Wari Distt Upper Dir CNIC No.15702-6290918-5	136.72	GMS Shaltalo	-do-	NA
21	793000727	Faiz Ul Alam	Village And Post Office Sheringal Dist Dir Upper CNIC No.15701-5953930-3	136.65	GMS Doug (B)	-do-	NA
22	79000301	Kuleem Ullah	Village /PO Sahib Abad District Dir Upper CNIC* 15702-7305643-9	135.88	GHSS Boyar	5657-63 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.

ATTESTED

16

- 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, 2013 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

Encls: No. 2969-75 / File No. 25/A-19/SST/Adhoc/Appt. 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 ESSE Department.
7. PA to the Director ESSE Khyber Pakhtunkhwa, Peshawar.
8. M/File

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

TESTED

17/4/18

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar

Pakistan

This certifies that

Ali Akbar Khan son of Shamsi Khan

having fulfilled all the requirements is hereby admitted to the degree of

Master of Science in Computer Science

and is entitled to all the rights, honours and privileges thereunto appertaining.

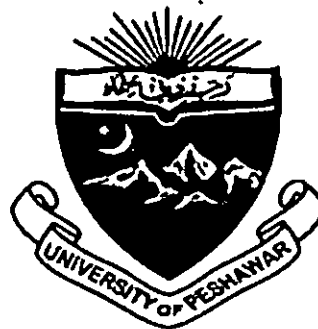
Given this 26th day of April 2013.

TESTED

Roll No: 4468

Session: Annual 2012

Registration No: 2010-M-9069



099830




Registrar


Vice Chancellor

17

UNIVERSITY OF MALAKAND
PAKISTAN

Serial No. 028310



Session 2008-2010




ALI AKBAR KHAN Son of SHAMSHI KHAN Registration No. 2008450036 Student of Govt. Degree College
Dir Upper Dir having passed the prescribed examination held in JUN-JUL, 2010 under Roll No. 48283 is admitted
by the University of Malakand to the degree of.

Bachelor of Science


in First Division

The examination was taken as a whole.


Controller of Examinations

Result Declared on 31-Aug-2010
Issuance Date 28-Oct-2015

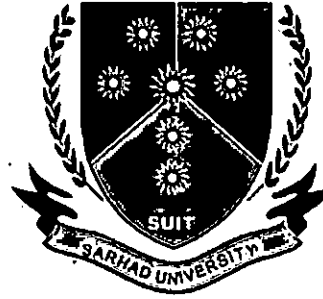
Countersigned


Vice-Chancellor

18

Registration No. SUCR-13-01-025-0025

Serial No. 016021



Sarhad University of Science & Information Technology

This is to certify that Ali Akbar Khan

son/daughter of Shamshi Khan

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

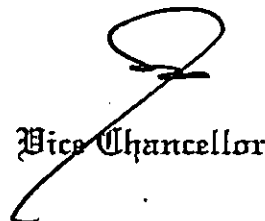
Bachelor of Education

With all the rights and privileges appertaining thereto.

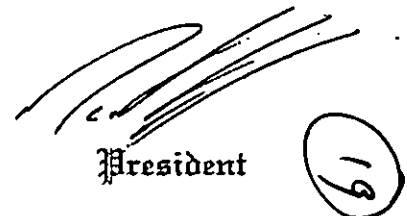
Given at Peshawar (PAKISTAN) on the Tenth Day of January Two Thousand Fifteen.

ATTESTED


Registrar


Vice Chancellor




President

19



University of Peshawar

PAKISTAN

Detailed Marks Certificate

Master of Science in Computer Science

Previous

Annual Examination 2011

Department of Computer Science, University of Peshawar



Regular

Name: ALI AKBAR KHAN

Gender: Male

Roll No: 630

Father's Name: SHAMSHI KHAN

Registration No: 2010-U-9069

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Databases-I	100	73	Seventy Three
Data Structures-II	100	75	Seventy Five
Operating System-III	100	66	Sixty Six
Object Oriented Language-IV	100	83	Eighty Three
Data Communication & Computer Networks-V	100	91	Ninety One
Digital Logic Design-VI	100	78	Seventy Eight
	600	466	Four Hundred and Sixty Six

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 13-Jul-2011 to 08-Aug-2011

Result Declared on Tuesday, January 31, 2012

Issue Date: 03-Feb-2012

9:51 am

Computerized by RTC

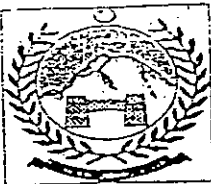
ATTESTED

(Iftexhar Hussain Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

NO 031506

20

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT.



Peshawar, dated the 24th July, 2014.

NOTIFICATION

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

AMENDMENTS

In the Appendix,-

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

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

(1).

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

ATTESTED

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

RESTRICTED

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

(7)


(ZAMIN KHAN MOMANI)
SECTION OFFICER (PRIMARY)

DELETED



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: -

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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-II 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.

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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.

(Javed 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 Akram)
Special Secretary, E&SE Deptt:

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

ATTESTED

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But in the SSRC meeting on 10/08/2017 E & SE Dept
Proposed that all those SST (Gen/Sc) who have MSc
(Computer Science) / BSCS/MIT may be given 50%

50% quota has already been allotted for SSTs (Gen/Sc) in the
different subjects for Subject Specialist. But but unfortunately
SST (Gen/Sc) who have MSc (Computer Science) / BSCS/MIT
qualifications are eligible for promotion to the post of SS(IT)
BFS-17 have no quota for promotion.
With most veneration it is to bring in your kind notice that
sewing against SST (Gen/Sc) posts in the E & SE Dept,
Hussain Rehman, Faghi Bani & Rafiq Ahmad Khan)
Khan Usman, Hissaid Ali Khan, Mujaffar Sadiq, Niaz Ahmad, Mujaffar Farooq Sadiq,
Ali Akbar, Shaban Liaqat, Athab Liaqat, Ganyam Khan, Gohar Zaman, Mubashir Hussain,
that we i.e. Atiqur Rahman, Mubib Ullah, Barakat Ullah,

Respect Sir,

Subject: Appeal For S.S.T (Gen/Sc) Promotion to
SS(IT) according to the SSRC meeting
on 10/08/2017 & on 02/01/2018 Regarding
allotment of 50% & 2% quota to SST (Gen/Sc)
For Promotion to the Post of SS(IT)

The Most Respected
Secretary E & SE Department
Khyber Pakhtunkhwa Peshawar
through: The Director
E & SE Department
K.P.K.

D

10

307
quota for promotion to the Post of S.S (IT) BPS-17 Like
other S.STs, so as to bring uniformity in teaching Cadre.

in the SSRC meeting on 02/01/2018. EOSE 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

D.S (Admin)

(2) Muhib Ullah

etc.

Recd. 13/9/18
Dated 13/9/2018

30A

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

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

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

Thanks

Dated: 13/09/2018

① Atiqul Rahman

② Muhib Ullah

etc.

DS (Admin)

And

(Recd. 13/9/18)
Dated 13/9/2018

TESTED

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

"E"

Writ Petition No. 877-D with C.N. 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."

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

Amir

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

ATTACHED

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
 21/11/2021
 EXAMINER
 J. Shaukat High Co.
 D.I. Khan Bt

ATTESTED

Notary Public for the State of California
My Comm. Expires 01/01/2020
I hereby certify that the foregoing is a true and correct copy of the original as shown to me by the person presenting the same for attestation.
12-02-19
[Signature]

CR No. 557
Applicant: [Name] and [Name] 12-02-19
Copies: 2
No of Pages: 05 Page
Car Fee: [Amount]
Liquor Fee: [Amount]
Total Fee: [Amount]
Copy ready for use: 12-02-19
Copy date rec'd at: 12-02-19
Signature of Applicant: [Signature]
12-02-19

From the Hon. Justice Richard Arnold
12/1

OK
12/1

JUDGE
[Signature]

JUDGE
[Signature]

Attest:
Dr. 30.01.2019
[Signature]

3. Accordingly for the reasons stated above, the petition is not maintainable and is dismissed along with costs and interest relief. However, the petitioner is at liberty to approach the competent forum for the redressal of their grievance, if so advised.

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



1. Abdul Ahad S/O Ghulam Muhammad S/O Ahmad
D.I.Khan currently working at GCHS no. D.I.Khan as SST (Physics & Mathematics).
2. Kalim Ullah S/O Rehmat Ullah C/o Baloch R/O Mohullah Ahmad Salb Eid
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 Gilluni Town near Wensum College
D.I.Khan Currently posted at GHS Haji Mora as SST (General), (Phd).
4. Ghulam Abbas S/O Ghulam Qasim R/O Village Mialy Tehsil Parova D.I.Khan
currently posted at GHS Mangal SST (General).
5. Abdul Ghafoor S/O Ghulam 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 Khef Village Daraki District Tank
SST (General).
10. Muhammad Farooq S/O Rahim Baksh R/O Village Chah Khan Wala Tehsil
Parova D.I.Khan currently posted at GHS Parova as SST (Physics & Mathematics).

VERSUS

ATTESTED

EXAMINER
Peshawar High Court
D.I.Khan District

15-02-19
 EXAMINER
 ANWAR HUSSAIN
 ANWAR HUSSAIN

The facts leading me to present will be given in brief here:
 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. 50 (PE) 4-5/SSRC/Meeting/2013/Teaching Cadre dated 26th 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

Respectfully Submitted:

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

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



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بعدالت اسوس ٹریڈنگ خیر بھنٹوں انجوائیٹس

2۔ پنجاب ایسٹیلٹ
علی اکبر خان بنام حکومت

اسوس ٹریڈنگ

موضوع
مقدمہ
دعویٰ
جزم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ~~اسوس ٹریڈنگ~~ کے ~~صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔~~ نیز
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث فیصلہ برحلاف 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 اپیل کی برادگی 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 با اختیار حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب ہے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
ڈگری کریں۔ لہذا نکالت نامہ لکھدیا کہ سندر ہے۔

المرقوم _____ 06 _____
ماہ جولائی 2019

واحد الب کے لئے منظور ہے۔

اسوس ٹریڈنگ

Accepted
&
Attested

علی اکبر خان
اسوس ٹریڈنگ

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2019

Ali Akbar

(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. 17/2/2023


CLIENT

Ali Akbar

ACCEPTED


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


KAMRAN KHAN


UMAR FAROOQ MOHMAND

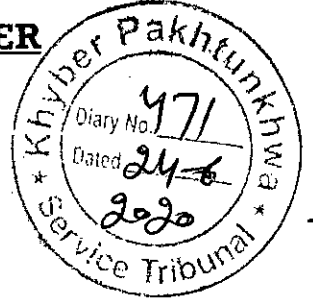

WALEED ADNAN

&

MUHAMMAD AYUB
ADVOCATES

OFFICE:
Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR



C.M No. _____/2020

In

Service Appeal No./1618/2019

Ali AkbarPetitioner

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 per teed
to the date already fixed,*
Through
26/6

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

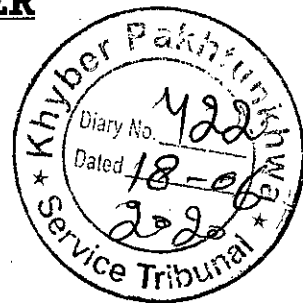
In

Service Appeal No. _____/_____

Ali Akbar.....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
Reader

Respectfully Sheweth:-

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

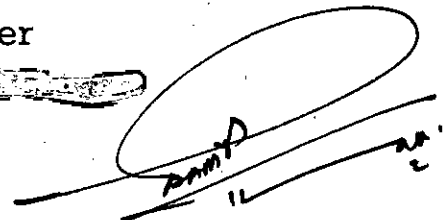
B- That the petitioner has good prima facie case, Balance of Convenience lies in favour of petitioner & if impugned notification is not suspended the petitioner would face irreparable loss as the petitioner is discriminated in the matter.

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.

Petitioner



Through



Saadat Ullah Khan Tangi

Advocate High Court

Peshawar

Cell#0331-5030566

Dated:-15.06.2020

(B)

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. ____/2020

In

Service Appeal No. ____/____

Ali Akbar.....Petitioner

Vs

Govt of KPK & Others.....Respondents

AFFIDAVIT

I, Ali Akbar S/O Shamsi Khan (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.

[Signature]
DEPONENT

Cell#

Cell#

Identified by

[Signature]

Saadat Ullah Khan Tangi

Advocate High Court

Peshawar

[Signature]
ATTESTED
NOTARY
PUBLIC
KHALID MAHMOOD
PESHAWAR HIGH COURT
7/6-6-2020



Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa

No. 379-12 SS (IT) Promotions

Dated Peshawar the: 8/6/2020

To

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

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

Memo:

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

S#	Sen#	Name	Qual:	Div in master	Prof: Qual:	DOB	Domicile	DO 1 st apptt	DO of apptt 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 converging letter from concerned D.E.O to ACR branch.
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