

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)

SCANNED  
KP ST  
Peshawar

\*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)


SCANNED  
KP ST  
Peshawar


\*KaleemUllah

S.A No. 1619/2019

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.


  
(Farooq 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

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

APPEAL NO: \_\_\_\_\_ OF 2019

Rafiq Ahmad Khan

(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**

*Rafiq Ahmad Khan*

**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 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-9314232)


27.09.2022

Junior to counsel for appellant present.

Muhammad Riaz Khan Painsakheil 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.

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

SCANNED  
KPST  
Peshawar

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

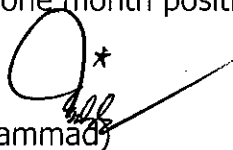
Due to summer vacation, case is adjourned to  
17.3.2021 for the same as before.

  
Reader

17.03.2021

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

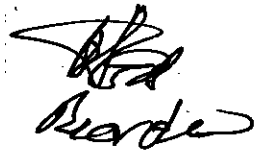
On 13.08.2020, the proceedings were adjourned for arguments, however, on subsequent two occasions, the matter was adjourned on the strength of Reader's Note. Learned AAG requests for time to furnish the reply/comments due to the said reason. Adjourned to 19.05.2021. On the next date arguments on the 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 10-9-201 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



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.

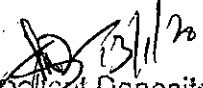
Despite last opportunity, the respondents have not furnished the requisite reply/comments. The matter is, therefore, posted to D.B for arguments on 28.10.2020.

  
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

  
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.

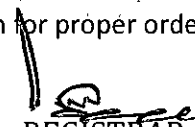

  
Member

Form- A

# FORM OF ORDER SHEET

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

Case No.- 1617/2019

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. Qayum Khan 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. Rafiq Ahmad Khan SST, GHS Drangal 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 departmental appeal in respect of appellatant is not attached with the appeal which may be placed on it.
- ⑤ 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.
- 6- Necessary party may be made in the heading of the appeal.

No. 1334 /S.T.

Dt. 31-7- /2019.

Saadatullah Khan Tangi Adv. Pesh.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

*Re Submitted after Completion*

*JP*

*17/8/19*

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

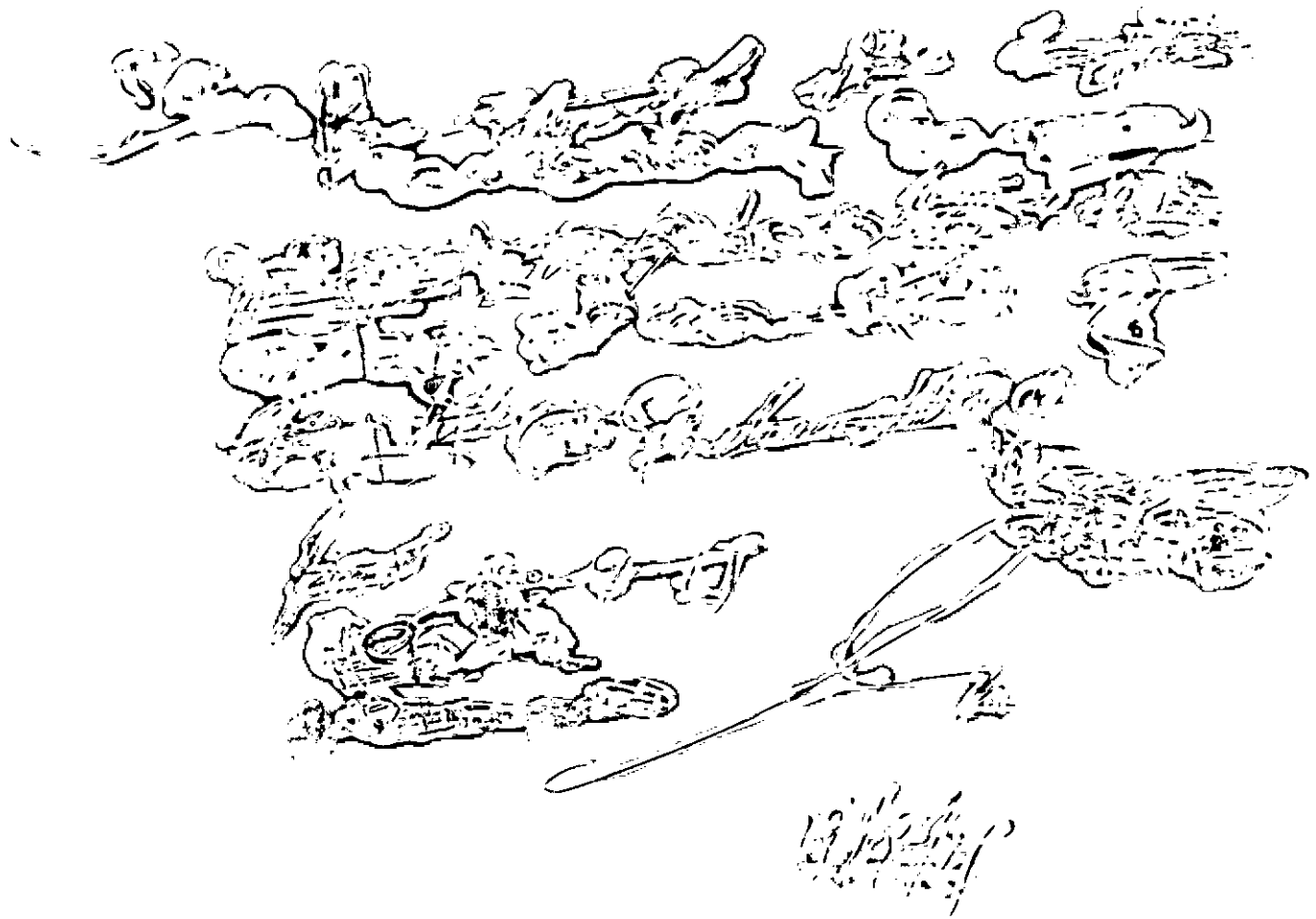
No. 1487 /S.T.

Dt. 23/8 /2019.

Mr.Saadatullah Khan Adv. Pesh.

  
REGISTRAR

Sir! Re-submitted after completion  
the same way kindly be clubbed with  
case title "Ghulam Abbas v/s Govt" fixed  
for 30-9-09. WP was filed by me  
colleges of petitioners being an identical case.  
23.9.09.



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

Service Appeal No. 1616 /2019

Rafiq Ahmad Khan.....**Appellant**

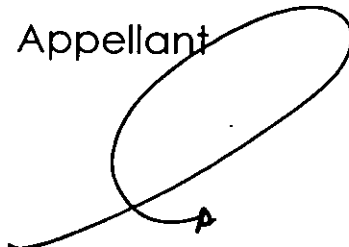
Versus

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	<b>A</b>	8-21
5.	Copy of Notification dt.24.07.2014	<b>B</b>	22-27
6.	Copy of minutes of the meeting	<b>C</b>	28-30
7.	Copies of departmental Appeal and Writ Petition	<b>D &amp; E</b>	31-36
8.	Wakalatnama		37

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

Rafiq Ahmad Khan S/o Amir Zaman,

Appointed as SST, GHS Drangal,

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 30.11.2015. (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

Rafiq Ahmad Khan.....**Appellant**

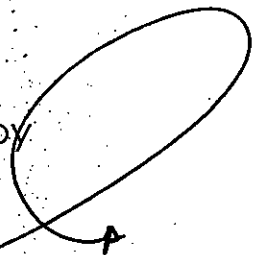
Versus

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

**AFFIDAVIT**

I, Rafiq Ahmad Khan S/o Amir Zaman, Appointed as SST, GHS Drangal, 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

Rafiq Ahmad Khar:.....**Appellant**

Versus

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

**ADDRESSES OF PARTIES**

**APPELLANT:**

Rafiq Ahmad Khan S/o Amir Zaman,  
Appointed as SST, GHS Drangal,  
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

Appellant

Through

  
Saadat Ullah Khan Tangi  
Advocate High Court

Dated 18.07.2019

Directorate of Elementary and Secondary Education

Khyber Pakhtunkhwa Peshawar

PH No. 091-9210930, 9210936,

9210437, 9210453, 9210463

Fax 091-9210936

E-mail: info@kpea.edu.pk



(8)  
A

**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 on PPS-36 (No. 10910/1225-49610) of Rs. 19210/- 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 joining over charge :-

**(SST Bio Chem)**

Sl. No.	Name	Address	Academic Marks (out of 100)	ETS Marks (out of 100)	Test Marks (out of 100)	Remarks
1	Muhammad Iqbal	Wahga And Four Office Nangal T-144 T-144 T-144 CNC No. 13277-202220000-4	89.57	81	120.00	GIS Lecturer
2	Get Ullah	School And College Timpore T-144 T-144 T-144 CNC No. 13277-202220000-4	83.47	63	108.00	GIS Project
3	Haris Ullah	Science Department Quaid E Azam University Islamabad CNC No. 13277-202220000-4	83.03	47	152.00	GIS Data
4	Muhammad Iqbal	Four Office Timpore T-144 T-144 T-144 CNC No. 13277-202220000-4	81.49	56	122.00	GIS Drawing
5	Muhammad Iqbal	Four Office Timpore T-144 T-144 T-144 CNC No. 13277-202220000-4	80.37	41	122.00	GIS Section Mujibi
6	Muhammad Iqbal	Four Office Timpore T-144 T-144 T-144 CNC No. 13277-202220000-4	80.33	63	126.00	GIS Section Durrani
7	Muhammad Iqbal	Four Office Timpore T-144 T-144 T-144 CNC No. 13277-202220000-4	80.34	50	124.00	GIS Administrator

**(SST Maths Phy)**

Sl. No.	Name	Address	Academic Marks (out of 100)	ETS Marks (out of 100)	Test Marks (out of 100)	Remarks
1	Muhammad Iqbal	Wahga And Four Office Nangal T-144 T-144 T-144 CNC No. 13277-202220000-4	85.57	86	130.00	GIS Project
2	Muhammad Iqbal	Wahga And Four Office Nangal T-144 T-144 T-144 CNC No. 13277-202220000-4	84.01	81	130.00	GIS Section Mujibi
3	Muhammad Iqbal	Wahga And Four Office Nangal T-144 T-144 T-144 CNC No. 13277-202220000-4	80.07	87	127.00	GIS Administrator

Dir Lower Male Appointment Order SST Adhoc 2

Sr	RollNo	Name	Address	Academic Marks [out of 100]	NTS Marks [out of 100]	Total Marks [out of 200]	School
4	6020065	Saeed Ullah	Room Number 108 Hostel Number 09 Allam Aigba Hostel Univeristy Of Peshawra District Peshwar CNIC No15305-2847550-5	66.45	61	127.45	GHS Dupoor Balo Khan
5	7720122	Tausif Iqbal	Village And Post Office Chakdara Tehsil Aden Zai District Lower Dir CNIC No15307-3456685-3	79.08	47	126.08	GHS Damtal
6	7720137	Inam Ullah	Village Machine Abad Tehsil Lal Qill P/O Kumber Maidan CNIC No15305-4183871-7	63.24	62	125.24	GHS Takoro
7	7720099	Rafiq Ahmad Khan	Village And Post Office Khadagzai Tehsil Adnzai District Lower Dir CNIC No15307-7931702-9	67.64	57	124.64	GHS Drangal
8	7720105	Ijaz Ahmad	Naeem Public School Post Office And Tehsil Timergara, District Lower Dir CNIC No15302-6488721-9	67.15	57	124.15	GHS Maskini
9	4520082	Ikram Ullah	Hostel No 04, Room No 10, Quaid-E-Azam University Islamabad. CNIC No15303-1730310-9	63.71	60	123.71	GHS Darmal Bala
10	4520037	Jamil Ur Rahman	Village Suhbat Khan Killay Post Office Qatab Garh, Tehsil Takht Bhai, District Mardan CNIC No16102-6919597-5	63.05	60	123.05	GHS Beyarai

(SST General)

Sr	RollNo	Name	Address	Academic Marks [out of 100]	NTS Marks [out of 100]	Total Marks [out of 200]	School
1	4531597	Muhammad Ilyas	Village And Post Office Mayar Jandool Tehsil Samar Bagh District Dir Lower CNIC No15303-5284170-3	60.25	82	142.25	GHS Jawzo
2	7830291	Imad Du Ddin	Hira School And College Timergara Dir Lower CNIC No15302-0847879-1	63.77	75	138.77	GMS Walatangi
3	7730685	Gul Rasool Khan	Babo Food Dealer Chowk Munda Bazar Distt Dir (Lower) CNIC No15304-0788025-3	62.77	75	137.77	GHS Shekawlat
4	7730374	Abrar Wahid	Bbc English Language College Ittifaq Plaza Timergara Dir Lower CNIC No15303-2929578-1	55.72	81	136.72	GMS Dhail
5	7730348	Hisan Ullah	Village Ranamansi Post Office Markhani Tehsil Lalhilla District Lower Dir CNIC No15305-7349595-1	60.3	76	136.3	GHS Dupoor Balo Khan
6	7730643	Nawab Zada	Village And Post Office Bandagai Talash Tehsil Timergara District Dir Lower CNIC No15302-4595901-5	59.83	76	135.83	GHS Shalkani
7	7730683	Umer Duraz Khan	Rw Office Inverstigation Block District Police Lines At Balambat Colony Dir Lower CNIC No15304-5531028-1	60.25	75	135.25	GMS Shahi
8	7930474	Zia Ul Islam Nabeel	Village And Post Office Odigram Lower Dir Timergara	58.19	77	135.19	GHS Safarai

(10)

**Dir Lower Male Appointment Order SST Adhoc 3**

			CNIC No15306-3041084-3				
9	7630227	Gul Hameed Khan	Department Of Economics Hazara University Of Mansehra CNIC No15304-4463191-1	55-71	79	134-73	GMS Baba Gam

**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 wof 1st December, 2015 to 30<sup>th</sup> 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.
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 proceeded 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.

**(Muhammad Rafiq Khattak)**

Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

30/11/2015  
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



**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**

S#	Roll No.	Name	Address	Total Marks [out of 200]	Name of School	Appointment order No and dated	Extension order No and dated if any
1		Fazal Hussain	Village Khawas Post Office Asbanr Tehsil Adenzai Chakdara Dir Lower CNIC No 15307-4967616-7	148.51	GHSs Asbanr	2068-75 dated 30-04-2014	4913-20 dated 28-04-2017
2	7810261	Atta Ullah	Khyber Pakhtun Khaw District Dir Lower Tehsil And Post Office Samar Bagh Village Kambati CNIC No 15303-6144426-9	138.23	GHS Dantai	-do-	-do-
3		Syed Ashfaq Ahmad	Village Mian Banda Tehsil And Post Office Timergara CNIC No 15302-6774090-5	137.95	GHS Manz Banda	-do-	-do-
4	7810317	Wasiaullah	Tajak Book Depot Naz Market Main Bazar Timergara Dir Lower CNIC No 15302-3709623-5	134.42	GHS Maskini	-do-	-do-
5	7710387	Shakir Ullah	Osama Cloth Depo Zait Plaza Near Imran Hospital Timergara CNIC No 15306-8056498-1	133.41	GHS Shal Kandi	-do-	-do-
6		Tawab Ullah	Amine Travel Agency Gorgori Chowk Timergara CNIC No 15306-4826511-3	132.81	GHS Mian Kalai	-do-	-do-
7		Habib Ull Hassan	Salman Corporation Askary Cement Dealer Balambat Road CNIC No 15306-3311763-1	131.97	GHS Toor Qila	-do-	-do-

**2015**

Sr#	Roll No.	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
-----	----------	------	---------	--------------------------	--------	--------------------------------	-------------------------------------

12

92	771000396	Zia Muhammad	Village And Post Office Khadagzai Tehsil Adenzai District Lower Dir CNIC No 15307-3739206-9	120.85	GHS Badwan	-do-	NA
93	771000437	Asad Ullah Khan (Disable)	Village And Post Office Asbanr Tehsil Adenzai District Lower Dir CNIC No 15307-9045216-5	121.87	GHS Ramora	-do-	NA
94	891000512	Bakhtawar Said (Disable)	Naway Kalay Timergara Dir Lower Tehsil Timergara Village Nawaykalay CNIC No 15302-6817418-9	120.23	GHS, Munjai	-do-	NA

95	891000516	Sayed Ijaz Ahmad Jan	Village Landa Koor Post Office Kotki, Tehsil Munda Distt Lower Dir CNIC No 15304-2582178-3	121.96	GHS, Shamshi Khan	-do-	NA
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### SST Maths Physics 2014

S#	Roll No.	Name	Address	Score	Name of School	Appointme nt order No and dated	Extension order No and dated if any
1		Nasir Ullah	Village And Po Bagh Dush Khel Tehsil Timurgara Lower Dir CNIC No 15302-9009214-3	126.33	GHS Munjai	2076-83 dated 30-04-2014	4913-20 dated 28-04-2017
2	7820153	Ghayas ud Din	Wadi Banda Kambat Po Teh Samar Bagh Distt Dir Lower CNIC No 15303-4803050-3	124.6	GHS Badin	-do-	-do-
3		Muhammad Riaz	Village Ganja Karamar P/O Rabat Tehsil Balamat District Lower Dir CNIC No 15306-3869905-3	122.14	GHS Watangi	-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 Balamat Distt Dir. CNIC No 15306-8413515-1	119.61	GHS Maskini	-do-	-do-
6		Sardar Hameed	Village Kagan, Post Office Khadagzai, Distt Dir Lower Tehsil Adenzai CNIC NO.15307-0590356-1	118.69	GHS Luqman Banda	-do-	-do-
7	20185	Layaq Akbar	Village Koti Gram Mahallah Kheajal Barishah Thesil Adenzai Chakdara CNIC No 15302-1215573-5	116.67	GHS Mian Kalai	-do-	-do-

### 2015

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointme nt order No and dated	Extension order No and dated if any
8	7720016	Muhamma d Aasim	Village And Post Office Saldo Tehsil Timergara Lower Dir CNIC No15302-4359201-7	130.01	GHS Laj Book	3980-86 dated 30-11-2015	6250-57 dated 30-11-2017
9	7720133	Arshad Iqbal	Village And Post Office Hayasevi Tehsil Balamat Dir Lower CNIC No15302-5192825-1	127.67	GHS Sangolai	-do-	-do-
10	6020065	Saeed Ullah	Room Nubmer 108 Hostle Nubmer 09	127.45	GHS Dapoor	-do-	-do-

MC

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 Aiqba Hostel Univeristy Of Peshawra District Peshwar CNIC No15305-2847550-5		Balo Khan		
✓ 11	7720099	Rafiq Ahmad Khan	Village And Post Office Khadagzai Tehsil Adnzai District Lower Dir CNIC No15307-7931702-9	124.64	GHS Drangal	-do-	-do-
12	7720105	Ijaz Ahmad	Naeem Public School Post Office And Tehsil Timergara, District Lower Dir CNIC No15302-6488721-9	124.15	GHS Maskini	-do-	-do-
13	4520037	Jamil Ur Rahman	Village Suhbat Khan Killay Post Office Qutab- Garh, Tehsil Takht Bhai, District Mardan CNIC No16102-6919597-5	123.05	GHS Beyarai	3980-86 dated 30-11-2015	-do-

2017

Sr#	RollNo	Name	Permanent Address With NIC	Total Marks [Out of 200] J=H+I	School Applied for	Appointment order No and dated	Extension order No and dated if any
14	892000030	Noor Hidayat Khan	Village Dag Malala Post Office Khazana Tehsil Munda District Lower Dir CNIC No.15304-9898735-1	136.16	GHSS Khazana	3095-3102 dated 18-04-2017	NA
15	772000042	Tausif Iqbal	Village And P/O Chakdara Khas Lower Dir CNIC No.15307-3456685-3	133.71	GHSS Asbanr	-do-	NA
16	892000319	Sadeeq Ullah	Shera Malakand Paien Teh Balambat CNIC No.15306-4538277-1	129.76	GHS Koheray Malakand	-do-	NA
17	892000115	Iqbal Ud Din	Iqbal Ud Din S.O Naeem Jan Village Shekaw Lai Post Officesaddo Tehsil Timergara Dir Lower CNIC No.15302-3819827-9	127.5	GHS Balambat	-do-	NA
18	892000130	Asmat Ullah	Village And P/O Bagh Dushkhel Teh Timergara Dist Dir Lower CNIC No.15302-8717550-9	126.67	GHS Bagh Dushkhel	-do-	NA
19	892000081	Muhammad Muhtashin	Village Miangan Dehri Tehsil And Post Office Lal Qilla CNIC No.15305-2616020-5	125.75	GHSS Bagh Maidan	-do-	NA
20	892000054	Qaisar Khan	Mohallah Gulshanabad Village And Post Office Ouch West Tehsil Adenzai District Dir Lower CNIC No.15307-8218833-3	124.37	GHSS Khair Abad	-do-	NA
21	892000313	Hussain Rahman	Village Tngi Noorakhali Talash Tehsil Timerra District Lower Dir CNIC No.15302-2579923-1	124.18	GHS Banda Talash	-do-	NA
22	892000047	Mujahid Farooq Sodiqi	Village Banda Talash Post Office Nasafa Tehsil Timergara District Lower Dir CNIC No.15302-7731497-1	123.73	GHS Ouch Sharqi	-do-	NA

14	15302-01001	Shakeel Akhtar	Khall Dist Dir Loer CNIC No.15705-9125879-9 Village And Post Bandogai Talash Dist Dier Lower CNIC No 15302-5007886-7	139.21	Ghs Shekuwai	-do-	NA
15	7730-01662	Asif Ali	Village And Post Office Badwan Tehsil Adenzai Lower Dir CNIC No. 15302-5116888-7	140.17	GHSS Asbanr	-do-	NA

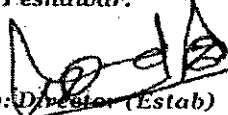
**TERMS & CONDITIONS.**

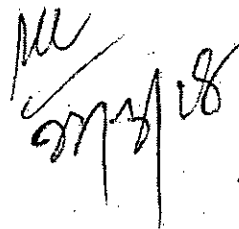
1. The regularization will not be in favour of those, who have not taken over charge OR has remained absent from duty OR resigned from service and also not for those who are under disciplinary proceedings.
2. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturer, Instructors and Doctors) Regularity Act, 2011 and such rules and Regulations as may be issued from time to time by the Government.
3. Their pay shall be released subject to the verification of academic and professional documents/ testimonials from the concerned boards/universities by the District Education Officers Concerned.
4. Their services will be considered regular and they shall be eligible for pension/ deduction of GP-Fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 as amended in 2013.
5. Their services are liable to termination on one month notice from either side. In case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
6. They shall possess the same qualification and experience required for the subject post on regular basis.
7. Their regularization shall not affect the promotion quota of the existing holders of posts in respective service cadre. They shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Khyber Pakhtunkhwa Public Service Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
8. Their seniority shall be determined on the basis of their continuous services in cadre, provided that if the date of continuous service in case of two or more employees is the same, the employee elder in age shall rank senior to the younger one.

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

4604-11  
Endst: No. / File No. 17/A-14/SST/Adhoc/Apptt: 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 (Estab)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

  
22/3/18

UNIVERSITY OF MALAKAND  
PAKISTAN

Serial No. 010583

5  
16



Session 2007-2011

RAFIQ AHMAD KHAN Son of AMIR ZAMAN KHAN Registration No. 20070010024 student of  
Department of Computer Science & I.T University of Malakand having passed the  
prescribed examination held in Sept-Oct 2011 under Roll No. 830 is admitted to the degree of

**BS (4-Year)**

in **Computer Science**

in First Division

Controller of Examinations

Result Declared on 27-Dec-2011

Issuance Date 11-Jun-2012

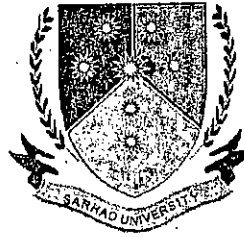
ASGHAR ALI  
SCT, BPS-16 GHSS,  
Chakdara Dir (L)

Countersigned

Vice Chancellor

17

Registration No. SUIT-12-02-025-0442



Serial No. 011893

# Sarhad University of Science & Information Technology

This is to certify that Rafiq Ahmad Khan .. son/daughter of Amir Zaman 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 Fifteenth Day of April Two Thousand Thirteen.

A large, stylized handwritten signature in black ink, likely belonging to the Registrar.

Registrar

A handwritten signature in black ink, likely belonging to the Vice-Chancellor.

Vice-Chancellor



A handwritten signature in black ink, likely belonging to the President.

President

**ASGHAR ALI**  
SCT, BPS-16 GHSS,  
Chakdara Dir (L)



**UNIVERSITY OF MALAKAND**  
**PAKISTAN**

**DETAILED MARKS CERTIFICATE**

BS (4-year) in Computer Science

Department of Computer Science & I.T  
Session (2007-2011)

Name: Rafiq Ahmad Khan

F/Name: Amir Zaman Khan

Reg. No: 20070010024

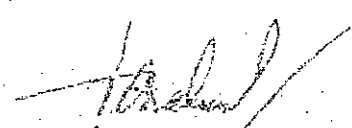
Subjects	Maximum Marks	Credit Hours	Marks Obtained			
			Internal	Theory	Practical	Total
English Comprehension	50	3		25		25
Islamiyat	50	2		36		36
Physics	100	3	15	39		54
Fundamentals of Computers	100	3	18	45	18	81
Calculus-1	100	3	12	58		70
1st Term Examination March 2008 Roll No: 124			Total Marks: 400		Result Date: May 19, 2008	Obtained Marks: 266
Programming Concepts	100	4	15	53	15	83
Mathematics-II	100	4	16	58		74
Discrete Mathematics	100	4	18	58		76
Electronics	100	3	18	70		88
2nd Term Examination August 2008 Roll No: 222			Total Marks: 400		Result Date: Oct 21, 2008	Obtained Marks: 321
Pakistan Studies	50	2		33		33
Business Communication	50	3		38		38
Data Structures	100	4	17	50	18	85
Object Oriented Programming	100	4	18	51	19	88
Digital Logic Computer Design	100	4	16	75		91
3rd Term Examination March-April 2009 Roll No: 321			Total Marks: 400		Result Date: Aug 20, 2009	Obtained Marks: 335
Computer Organization & Assembly Language	100	4	18	40	18	76
Operating System	100	4	18	49	17	84
Programming Language-I (Visual C++)	100	4	20	50	20	90
Database-I	100	4	18	52	17	87
Statistics and Probability	100	3	20	76		96
4th Term Examination Oct-Nov 2009 Roll No: 420			Total Marks: 500		Result Date: Jan 12, 2010	Obtained Marks: 433
Data Communication & Networks	100	4	18	49	17	84
Artificial Intelligence	100	4	18	50	18	86
Software Engineering-I	100	4	18	52	17	87
Programming Language-II ( Java )	100	4	18	52	18	88
5th Term Examination April-May 2010 Roll No: 520			Total Marks: 400		Result Date: Jun 30, 2010	Obtained Marks: 345
Network Strategies	100	4	17	42	17	76
Automata Theory	100	3	17	51	15	83
Computer Architecture	100	4	16	52	18	86
Numerical Analysis	100	4	19	53		72
Database- II	100	4	18	54	17	89
6th Term Examination Sep-Oct 2010 Roll No: 630			Total Marks: 500		Result Date: Dec 13, 2010	Obtained Marks: 406
E-Commerce Application and Technology	100	3	17	45	18	80
Network Security	100	3	16	48	18	82
Software Engineering -II	100	4	19	50	18	87
Web Programming	100	4	19	51	18	88
Design & Analysis of Algorithms	100	3	19	52	19	90
Computer Graphics	100	3	20	56	17	93
7th Term Examination March 2011 Roll No: 1724			Total Marks: 600		Result Date: May 31, 2011	Obtained Marks: 520
Compilers	100	4	19	53	17	89
Software Project Management	100	3	19	53	19	91
Multimedia Technology	100	4	19	57	18	94
Research Thesis (Software Project)	100	6		90		90
8th Annual Examination Sept-Oct 2011 Roll No: 830			Total Marks: 400		Result Date: Dec 27, 2011	Obtained Marks: 364

Total Result Status: Maximum Marks 3600 Obtained Marks 2990

Overall Percentage : 83.06 137

Errors and omissions are subject to subsequent rectification

Prepared by:  Checked by: 

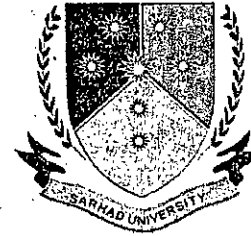
  
Controller of Examinations  
University of Malakand



19

Registration No. SUCR-13-01-036-0015

Serial No. 014855



# Sarhad University of Science & Information Technology


This is to certify that Rafiq Ahmad Khan son/daughter of Amir Zaman Khan

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

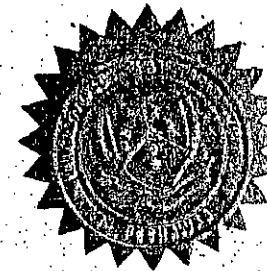
**Master of Education**

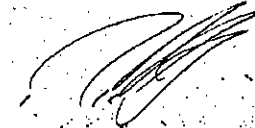
With all the rights and privileges appertaining thereto.

Given at Peshawar (PAKISTAN) on the Twenty Fifth Day of May Two Thousand Fifteen.

  
ASGHAR ALI  
Registrar  
SCT, BPS-16 GHSS,  
Chakdara Dir (L)

  
Vice Chancellor



  
President

20

UNIVERSITY OF MALAKAND  
PAKISTAN

Serial No. 027347




Session 2012-2014

RAFIQ AHMAD KHAN Son of AMIR ZAMAN KHAN Registration No. 20070010024 having completed the course of study approved by the University and passed the prescribed examination has been admitted to the Degree of

Master of Philosophy

in the subject of Computer Science

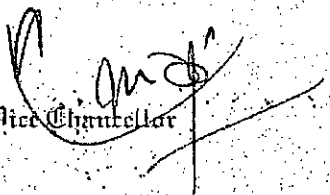
The field of specialization being  
Software Engineering

  
Controller of Examinations

Result Declared on 07-Aug-2015

Issuance Date 13-Aug-2015

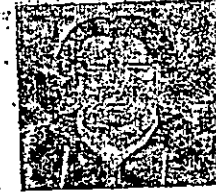
Countersigned

  
Vice-Chancellor

ASGHAR ALI  
SOF. BPS-16 GHSS,  
Chakdara Dir (L)



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



Student Name Rafiq Ahmad Khan

Father's Name Amir Zaman Khan

Program M.Phil

Enrollment No: DCS PGS-2012 010

S. No	Semester	Course Title	Course Code	Cr. Hours	Total Marks	Marks Obtained	Per(%)	GP	GPA	Remarks
<b>MS/MPhil Course Work</b>										
1	1st	Advanced Operating System	CS 701	3	100	62	62	8.4	3.03	PROMOTED
2		Research Methods in Computer Science	CS 903	3	100	67	67	9.3		
3		Advanced Topics in Software Engineering	CS 913	3	100	70	70	9.6		
Sub-total				9	300	199	66.3	27.3		
4	2nd	Qualitative Data Analysis	CS 902	3	100	75	75	10.5	3.50	PROMOTED
5		Empirical Software Engineering	CS 912	3	100	75	75	10.5		
6		Advanced Algorithm Analysis	CS 702	3	100	76	76	10.5		
Sub-total				9	300	226	75.3	31.5		
7	3rd	Theory of Computation	CS 908	3	100	65	65	9.3	3.15	PROMOTED
8		System Re-Engineering	CS 705	3	100	70	70	9.6		
Sub-total				6	200	135	67.5	18.9		
9	3rd & 4th	Research Communication and Coordination Challenges Mitigation Model for Offshore Software Development Outsourcing Vendors		6						Successfully Completed PASSED

Over all result status	
Total Points	77.7
Total Credits	30.0
CGPA	3.24

MS/Ph.D Coordinator Department of Computer Science & IT

Coordinator  
Deptt: of CS & IT  
University of Malakand

Countersigned By  
*[Signature]*  
Controller of Examination  
University of Malakand  
Dated 28/01/16

Chairman Department of Computer Science & IT

Chairman  
Department of  
CS & I.T.

32



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)	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.

50

				<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 as having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion queue shall be filled by initial recruitment; and</p> <p>(b) fifty percent by initial recruitment"; and</p>
1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	

(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 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 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>

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

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

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

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

26

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

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

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

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

Provided that if no suitable candidate is available from amongst

(5)



SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

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

  
ZAMIN KHAN MOMAN  
SECTION OFFICER (PRIMARY)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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

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

The following attended the meeting:-

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

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

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

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

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 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 <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

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

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

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

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

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

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

"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,ST (Gen/Sc) Promotion to  
SS(IT) according to the SSRC meetings  
on 10/08/2017 & on 02/01/2018 Regarding  
allotment of 50% & 20% Quota to SST (Gen/Sc)  
For Promotion to the Post of SS(IT)

Respect Sir,

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

Serving against SST (Gen/Sc) Posts in the E & SE Dept;

With most veneration it is to bring in your kind notice that  
50% quota has already been allotted for SSTs (Gen/Sc) in the  
different subjects for Subject Specialist Post but unfortunately,

SST (Gen/Sc) who have M.S (Computer Science) / B.S (CS) / M.T  
qualifications & are eligible for promotion to the Post of SS(IT)

B.S-17 have no quota for promotion.

But in the SSRC meeting on 10/08/2017, E & SE Dept

Proposed that all those SST (Gen/Sc) who have M.Sc.  
(Computer Science) / B.S (CS) / M.T may be given 50 %

(31)A

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

in the SSRC meeting on 02/01/2018 E.O.S.E 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

And

etc.

Recd.  
Dated 13/9/2018

13/9/18

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

Writ Petition No. 577-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 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."

ATTESTED  
22-2-2019  
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 Haftiz 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  
EXAMINOR  
Cashwar High Co  
D.I. Khan Sd



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

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

Announced  
Dt. 30.01.2019  
JUDGE

JUDGE

JUDGE

How Mr Justice S.M. Akhtar Shah  
How Mr Justice Shabaz Ahmad

off  
h/v

G.R.No. 557  
Applicant: Received on 1-02-19  
Copies: 5  
No of Pages: 05 page  
Copy fee: 04  
Urgent Fee: 20  
Total Fee: 24  
Copy ready for delivery: 12-02-19  
Copy delivered on: 12-02-19  
Signature of C.A. [Signature]  
12-02-19

Consent to file Case  
Petitioner High Court Bench District  
Subscribed by  
[Signature]

BEFORE PESHAWAR HIGH COURT BENCH AT D.I.KHAN

Writ No. 817 of 2018.



1. Abdul Ahud S/O Ghulam Muhammad S/O Ahmad D.I.Khan currently working at GCMS no. D.I.Khan as SST (Physics & Mathematics).
2. Kalim Ullah S/O Rehmat Ullah Cas : Baluch R/O Mohallah Ahmad Salb Eid Gzh D.I.Khan currently working as ASDEO SST (General) chudwan circle District D.I.Khan.
3. Dr. M. Naseem Ullah S/O Fatch Ullah R/O Gillani Town near Wensum College D.I.Khan Currently posted at GHS Haji Mora as SST (General), (Phd).
4. Ghulam Abbas S/O Ghulam Qasim R/O Village Miuly Tehsil Parova D.I.Khan currently posted at GHS Mungal SST (General).
5. Abdul Ghafoor S/O Ghulam Nubi Khan R/O Village Lunda Para Tehsil Parova D.I.Khan currently posted as GHS Wanda Sheru D.I.Khan SST (General).
6. Muhammad Imran S/O Haji Ismail R/O Parova D.I.Khan currently posted at GMS Malaikhi SST (General).
7. Muhammad Bilal S/O Malik Muhammad Amir R/O Currently posted at GHS SST (General) Gara Rahid D.I.Khan.
8. Rafi Ullah S/O Hameed Ullah R/O Kot Nawaz District Tank, currently working as ASDEO Education Office Tank SST (General).
9. Asmat Ullah S/O Rahmat Ullah R/O Shadi Khet 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).

*Shauq*

VERSUS

ATTORNEY  
EXAMINER  
Peshawar High Court  
D.I.Khan Bench

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

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

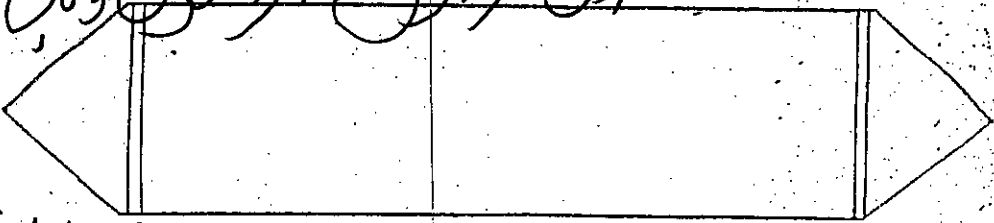
Respectfully Sheweth:

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

1. That petitioner having degree of Bachelor of Science, appointed as Secondary School Teacher (General/Science). Copy of academic qualifications and notifications are annexure A & B.
2. That petitioner also acquired the degree of Master of Computer Science. Copy of Certificates is annexure C.
3. That respondent vide notification no. 50 (PE) 4-5/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

ATTACHED  
 13-02-19  
 EXAMINER  
 Peshawar High Court  
 O.S. Khan

# بعدالت سرس ٹریبیونل جیمز بختوان کو اپنا نام



2۔ پنجاب ایڈووکیٹ

رفیق احمد خان بنام حکومت

سروس ٹریبیونل

مدرجہ  
مقدمہ  
دعوی  
چیم

## باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام سروس ٹریبیونل کیلئے سعادت اللہ جان تنگی اللہ دوسری دفعی کی طرف 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 ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق ذرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائز التوائے مقدمہ کے سبب ہے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

رفیق احمد خان وولم احمد خان

المرقوم 26 جولائی 2019

واہ العب

کے لئے منظور ہے۔  
Accepted  
Masood

سروس ٹریبیونل

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



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

In

Service Appeal No. ~~1313~~/2019

Rafiq Ahmad Khan.....Petitioner

**Vs**

Govt of KPK & Others.....Respondents

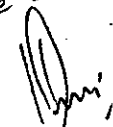
Subject:- **APPLICATION FOR EARLY HEARING IN THE  
CAPTIONED CASE ALONG WITH CONNECTED  
PETITIONS.**

**Respectfully Sheweth:-**

The petitioner humbly submits as under:-

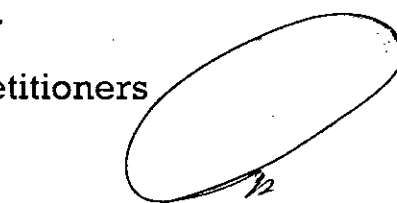
- 1- That the captioned connected Service Appeals is pending adjudication before this August Tribunal for 07.07.2020.
- 2- That the respondents issued notification dated 08.06.2020, and it is very necessary to restrain them from acting upon the same, that's why the petitioners preferred stay applications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

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

*Shall remain posted to the date already posted.*  
  
26/6

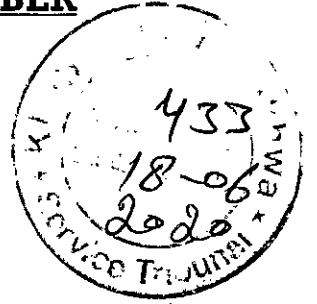
Through

Petitioners

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

Rafiq Ahmad Khan .....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.**

*Part of B Du  
Court  
[Signature]*

**Respectfully Sheweth:-**

The petitioner humbly submits as under:-

*Recd*

- 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.

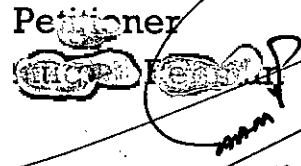
**GROUND:-**

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.

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  
  
11/6/20

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

Rafiq Ahmad Khan.....Petitioner

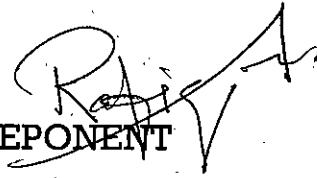
**Vs**

Govt of KPK & Others.....Respondents

**AFFIDAVIT**

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

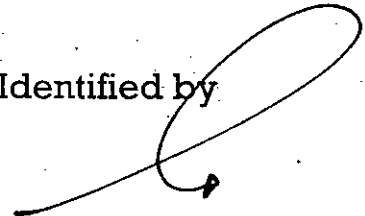
DEPONENT



ENIC

Cell#

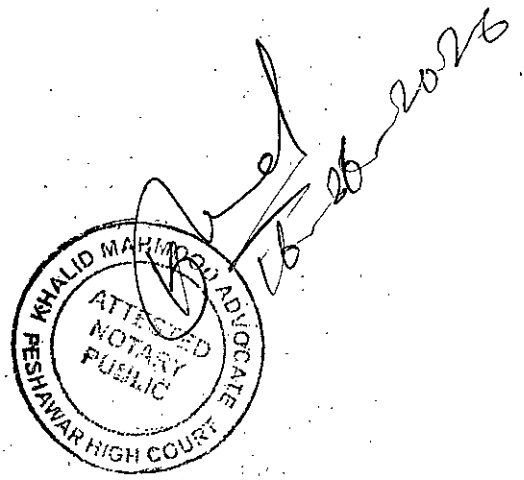
Identified by



**Saadat Ullah Khan Tangi**

Advocate High Court

Peshawar







Directorate of Elementary & Secondary Education Khyber  
Pakhtunkhwa

No. 379-12 SS (IT) Promotions

Dated Peshawar the: 8/6/2020

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AS

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> apptt	DO of apptt 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