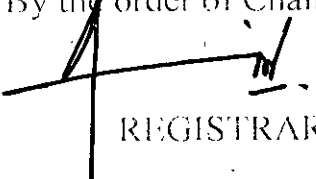


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

97/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/01/2024	<p>The appeal of Mr. Hamuid Bacha resubmitted today by Mr. Inayat Ullah Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Hamid Bacha received today i.e on 01.01.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of respondent no.5 & 7 are incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules-1974.
- 2- Annexures of the appeal are unattested.
- 3- Memorandum of appeal is not signed by the appellant.

No. 10 /S.T.

DL 2/1 /2024.




REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Inayat Ullah Khan Adv.
High Court Peshawar.

Re. submitted files is complete by Inayat

Ullah Khan.


8-1-24

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,
PESHAWAR.

S.A.No. 97 /2024

Hamid Bacha..... Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Chief Secretary and others


..... Respondents

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3)	Copy of appointment order dated 12.09.2014	A	12-14
4)	Copy of regularization order dated 08.03.2019.	B	15-17
5)	Copy of CNIC	C	18
6)	Copy of Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (appointment and regularization of Services) Act, 2017	D	19-22
7)	Copy of objection.	E	23
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Appellant

Through


Inayat Ullah Khan
Advocate Supreme High Court
LL.M (U.K)
Cell: 0333-9227736

Dated: __.12.2023

1

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,
PESHAWAR.

S.A.No. 97 /2023

Hamid Bacha son of Mian Jamee-ud-Din
R/o Mohallah Miangan, Sudher, Tehsil Lahor District Swabi
Currently serving as Subject Specialist (IT) BPS-17
Government Higher Secondary School, Kalu Khan.....Appellant

Versus

- 1) Government of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar.
- 3) Directorate of Elementary and Secondary Education, Khyber Pakhtunkhwa, Near GHSS No.1 Firdos, Peshawar.
- 4) District Education Officer, (M) Swabi
- 5) Majid Ali, C/O Javed Khan, SS (IT) BS-17, GHSS Gujar Garhi, Mardan.
- 6) Gul Nawar, SS (IT) BS-17 GHSS Hakim Haved Bannu.
- 7) Kifayat Ullah, Mohallah Khatkian Wala, D.I.Khan, SS (IT) BS-17, GHSS Choudwan D.I.Khan.
- 8) Jamshid Ahmad, Village Bander Kila, Post Office Azim Kila, Tehsil Domel, SS (IT) BS-17 GHSS Landiwah Lakki Marwat.
- 9) Muhammad Muneeb, M-Hayat and Sons Jewelry Box Center, Tehsil Bazar, SS (IT) BS-17 GHSS Amandi Umar Bannu.
- 10) Muhammad Junaid Iqbal, Mohallah Chichrai, Mansehra, SS (IT) BS-17 GHSS Lasa Takral, Mansehra.
- 11) Muhammad Irfan, Tehsi Post Office Shah Village Azeem Khan Michani Road Charsadda, SS (IT) BS-17 GHSS Dhaki Charsadda.

- 12) Sarfaraz Ahmad, Village and P/O Sher Garh, Tehsil Ogh District Mansehra, SS (IT) BS-17 GHSS Gali Badral Mansehra.
- 13) Fayaz Ali, Village Sania Tehsi Puran, P/O Sundov, District Shangla SS (IT) BS-17 GHSS Chawga Sahngla.
- 14) Amin-ur-Rahman, Village Stanadar, Tehsil Baambat, Post Office Timergara C/O Aziz Medical Store Baakout Timergara, SS (IT) BS-17 GHSS Rehanpur, Dir Lower.
- 15) Zakir Khan, New institute of Professional Opposite Main Gate Hazara University Mansehra, SS (IT) BS-17 GHSS Oghi Mansehra.
- 16) Waqas-ul-Islam, Farman Concrete Industries, Farman Abad Village Kharkai P/O Dargai, Malakand, SS (IT) BS-17 GHSS Ghani Dheri, Malakand.
- 17) Umair Awan, House No.F-786 Near Tariq G S Dub Number 01 Mansehra, SS (IT) BS-17 GHSS Tarapi Mansehra.
- 18) Qaisar Khan SS IT, GHSS Khairabad Dir Lower
- 19) Imran Pervez, Mohallah Akhun Din Baba, Village and Post Office Akora Khattak, Nowshera, SS (IT) BS-17 GHSS Manski Sharif, Nowshera.
- 20) Khush Dil, Village Maira P/O Sahib Abad, Tehsil Wari, Dir Upper, SS (IT) BS-17 GHSS Gandigar, Upper Dir.
- 21) Ashfaq-ur-Rahman, Mohallah Wasta Khal Village and Post Office Torwarsak, Tehsil Daggar Bunner, SS (IT) BS-17 GHSS Batara Buner.
- 22) Faiz Ullah, Village and P/O Gul Abad Mera Tehsil and District Charsadda, SS (IT) BS-17 GHSS Utmanzai, Charsadda
- 23) Naseer Muhammad, C/O Hayat Muhammad Staff Colony, Board of Intermediate and Secondary Education, Peshawar, SS (IT) BS-17 Govt. Shaheed Usama Zafar CMHSS No.2, Peshawar.
- 24) Zeeshan Sohail SS IT, GHSS Mayar Mardan
- 25) Saif Ullah, The Bank of Khyber Near Afalah Bank Battagram, SS (IT) BS-17 GHSS Batagram.
- 26) Muhammad Siddiq, PO Zando Dheri Mohib Banda Tehsil & Distt: Mardan, SS (IT) BS-17 GHSS Shahbaz Garhi, Mardan.

- 27) Sajid Amin, Mohallah Kooz Cham Village and Post Office Tehsil Lahor, District Swabi, SS (IT) BS-17 GHSS Ismaila Swabi
- 28) Majid Khan, SST IT, GHS Baidra Mansehra
- 29) Majid Khan SS IT, Jabbori Mansehra
- 30) Farooq Ahmad, Cantonment Board Staff Colony H.No C-18 Kamra Cantt. Tehsil & Distt Attock, SS (IT) BS-17 GHSS Rashakai, Nowshera.
- 31) Nisar Ahmed SS IT, GHSS Chanda Khurram Karak
- 32) Irfan Ahmad, Village and Post Office Mian Khan Mardan City Mardan, SS (IT) BS-17 GHSS Kohi Barmol, Mardan.
- 33) Tahir Saleem SS IT, GHSS Nari Panoos Karak.
- 34) Qaisar Shah, Village P/O and Tehsil Tangi Mohallah Gul Bagh Nasrat Zai, District Charsadda, SS (IT) BS-17 GHSS Muhammad Nari, Charsadda.
- 35) Fazli Rabi, Mohallah Combokhel, Village and Post Office Jowar, Tehsil Daggar, Buner, SS (IT) BS-17 GHS Shamdarfa, Oghi, Mansehra.
- 36) Faisal Rehman, Village and Post Office Jhangra, Tehsil Havelan District Abbotabad, SS (IT) BS-17 GHSS Jatti Pind Haripur.

..... Respondents

Appeal u/s 4 of the Khyber Pakhtunkhwa
Service Tribunal Act, 1974.

Prayer:

On acceptance of this appeal, it is, therefore, humbly prayed that the impugned final seniority list dated 31.12.2021 may kindly be revised with directions to the official respondents to place the name of appellant at correct serial number i.e. 36 instead of 68 with all consequential back

benefits, increments and promotion rights to whom the appellant found eligible under the existing facts and circumstances of the instant case with further prayer to extend the benefit of recent judgments delivered on the same point of law in Service Appeal No.2069/2019 titled Abid Noor v/s Director E&SE and others and another Service Appeal titled Janbaz v/s Director E&SE and others.

Any other relief which this Hon'ble Tribunal deems appropriate in the circumstances of this service appeal and to whom the appellant found entitled may kindly also be granted.

Respectfully Sheweth;

Brief facts giving rise to the instant service appeal are as under:-

- 1) That the appellant was appointed as IT Teacher (BPS-16) on contract basis vide order dated 12.09.2014 through National Testing Service (NTS) and later on regularized vide order dated 08.03.2019 w.e.f. the date of initial appointment.

It is pertinent to mention that the appellant having obtained the degree of B.S IT with additional professional qualification of B.Ed.

(Copy of appointment order dated 12.09.2014 is attached as Annexure "A" while regularization order dated 08.03.2019 is attached as Annexure "B").

- 2) That the appellant's date of birth according to CNIC is 02.02.1983.

(Copy of CNIC is attached as annexure "C").

- 3) That as per Section-4 Sub Section 2 of Act, 2017 speaks about "Determination of Seniority" which states and the same is reproduced in verbatim for the ready reference of this Honourable Tribunal.

Section-4 "Determination of Seniority"1.....

"2 The seniority inter-se of those employees, whose services are regularized under this Act within the Cadre, Shall be determined on the basis of their continuous service in Cadre:

Provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one"

(Copy of Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (appointment and regularization of Services) Act, 2017 is attached as Annexure "D").

- 4) That the official respondents published tentative seniority list in respect of SST (IT) BPS-16 on 31.12.2021 wherein the appellant was placed at Sr.No.66, while his correct serial Number as per section-4 sub section (2) proviso is 36, therefore, filed an objection for correction of his due serial number i.e. 36 instead of 66, but the same has not been responded till date.

(Copy of objection is attached as Annexure "E" and tentative seniority list is Annexure "E/1").

- 5) That in the meanwhile the official respondents without addressing the objection preferred by the appellant, published final seniority list dated 31.12.2021, which was not communicated to the appellant.

It is pertinent to mention that according to the final seniority list the appellant was placed at Sr.No.68 instead of 36 as per section 4 sub section (2) proviso of Regularization Act, 2017.

(Copy of final seniority list is attached as Annexure "F")

- 6) That since the final seniority list was not communicated to the appellant through any formal official channel. However, the appellant preferred his departmental appeal dated 18.09.2023 against the final seniority list for placing him at Sr.No.36 instead of 68, but the same has not been responded till date despite lapse of statutory period of 90 days.

(Copy of departmental appeal is attached as Annexure "G")

- 7) That the appellant is senior in age than private respondents No. 5 to 36.
- 8) That the appellant feeling aggrieved from the final seniority list dated 31.12.2021 as referred to in Para No.5 being shown Junior to the private respondents No.5 to 36, hence constrained to file the instant service appeal for restoration of his due placement at Sr.No.36 instead of 68, on the following amongst other grounds.

GROUND OF APPEAL:

- a) That the impugned seniority list is against the law, facts and material available on record.

- b) That as per Section-4 Sub Section 2 proviso of Appointment and Regularization of Services Act, 2017 the appellant's claim is fully justified and entitled to be ranked senior than private respondents No.5 to 36, because the appellant is senior in age in terms of the ibid section.

It is pertinent to mention that the date of birth of the appellant is 02.02.1983 who is older in age than private respondents No.5 to 36, whom dates of birth mentioned in the final seniority list.

- c) That the official respondents failed to apply their independent minds to Section-4 Sub Section-2 proviso of Appointment and Regularization Services Act, 2017 and notification dated 08.03.2019, which provides that an employee who is older in age shall rank senior than employees whom date of continuous service in the case of two or more employees is the same.
- d) That recently this Hon'ble Tribunal delivered judgments on the same principle of law in Service Appeal No.2069/2019 titled Abid Noor v/s Director E&SE and others and another Service Appeal titled Janbaz v/s Director E&SE and others. Copies of the judgments will be produced at the time of arguments.
- e) That the additional grounds will be raised at the time of arguments with the kind permission of this Hon'ble Tribunal.

Keeping in view, what has been stated above, it is, therefore, humbly prayed that the impugned final seniority list dated 31.12.2021 may kindly be revised with directions to the official respondents to place the name of appellant at correct serial number i.e. 36 instead of 68 with all consequential back

benefits, increments and promotion rights to whom the appellant found eligible under the existing facts and circumstances of the instant case with further prayer to extend the benefit of recent judgments delivered on the same point of law in Service Appeal No.2069/2019 titled Abid Noor v/s Director E&SE and others and another Service Appeal titled Janbaz v/s Director E&SE and others.

Any other relief which this Hon'ble Tribunal deems appropriate in the circumstances of this service appeal and to whom the appellant found entitled may kindly also be granted.

Dated: __.12.2023

Appellant

Through



Inayat Ullah Khan
Advocate Supreme Court
LL. M (U.K)

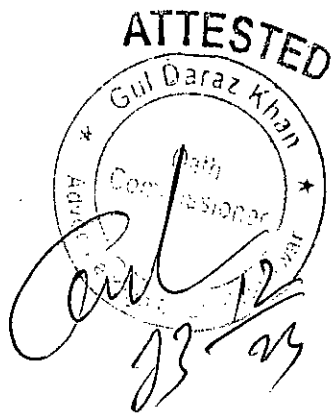
AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Deponent

ATTESTED
Gul Daraz Khan
* *
Comptroller
Advocate
12/12/23



BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,
PESHAWAR.

S.A.No.____/2023

Hamid Bacha..... Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Chief Secretary and others

..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Hamid Bacha son of Mian Jamee-ud-Din
R/o Mohallah Miangan, Sudher, Tehsil Lahor District Swabi
Currently serving as Subject Specialist (IT) BPS-17
Government Higher Secondary School, Kalu Khan

RESPONDENTS:

- 1) Government of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Government of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar.
- 3) Directorate of Elementary and Secondary Education, Khyber Pakhtunkhwa, Near GHSS No.1 Firdos, Peshawar.
- 4) District Education Officer, (M) Swabi
- 5) Majid Ali, C/O Javed Khan, SS (IT) BS-17, GHSS Gujar Garhi, Mardan.
- 6) Gul Nawar, SS (IT) BS-17 GHSS Hakim Haved Bannu.
- 7) Kifayat Ullah, Mohallah Khatkian Wala, D.I.Khan, SS (IT) BS-17, GHSS Choudwan D.I.Khan.
- 8) Jamshid Ahmad, Village Bander Kila, Post Office Azim Kila, Tehsil Domel, SS (IT) BS-17 GHSS Landiwah Lakki Marwat.

- 9) Muhammad Muneeb, M-Hayat and Sons Jewelry Box Center, Tehsil Bazar, SS (IT) BS-17 GHSS Amandi Umar Bannu.
- 10) Muhammad Junaid Iqbal, Mohallah Chichrai, Mansehra, SS (IT) BS-17 GHSS Lasa Takral, Mansehra.
- 11) Muhammad Irfan, Tehsi Post Office Shah Village Azeem Khan Michani Road Charsadda, SS (IT) BS-17 GHSS Dhaki Charsadda.
- 12) Sarfaraz Ahmad, Village and P/O Sher Garh, Tehsil Ogh District Mansehra, SS (IT) BS-17 GHSS Gali Badral Mansehra.
- 13) Fayaz Ali, Village Sania Tehsi Puran, P/O Sundov, District Shangla SS (IT) BS-17 GHSS Chawga Sahngla.
- 14) Amin-ur-Rahman, Village Stanadar, Tehsil Baambat, Post Office Timergara C/O Aziz Medical Store Baakout Timeergara, SS (IT) BS-17 GHSS Rehanpur, Dir Lower.
- 15) Zakir Khan, New institute of Professional Opposite Main Gate Hazara University Mansehra, SS (IT) BS-17 GHSS Oghi Mansehra.
- 16) Waqas-ul-Islam, Farman Concrete Industries, Farman Abad Village Kharkai P/O Dargai, Malakand, SS (IT) BS-17 GHSS Ghani Dheri, Malakand.
- 17) Umair Awan, House No.F-786 Near Tariq G S Dub Number 01 Mansehra, SS (IT) BS-17 GHSS Tarapi Mansehra.
- 18) Qaisar Khan SS IT, GHSS Khairabad Dir Lower
- 19) Imran Pervez, Mohallah Akhun Din Baba, Village and Post Office Akora Khattak, Nowshera, SS (IT) BS-17 GHSS Manski Sharif, Nowshera.
- 20) Khush Dil, Village Maira P/O Sahib Abad, Tehsil Wari, Dir Upper, SS (IT) BS-17 GHSS Gandigar, Upper Dir.
- 21) Ashfaq-ur-Rahman, Mohallah Wasta Khal Village and Post Office Torwarsak, Tehsi Daggar Bunner, SS (IT) BS-17 GHSS Batara Buner.
- 22) Faiz Ullah, Village and P/O Gul Abad Mera Tehsi and District Charsadda, SS (IT) BS-17 GHSS Utmanzai, Charsadda
- 23) Naseer Muhammad, C/O Hayat Muhammad Staff Colony, Board of Intermediate and Secondary Education, Peshawar, SS (IT) BS-17 Govt. Shaheed Usama Zafar CMHSS No.2, Peshawar.

- 24) Zeeshan Sohail SS IT, GHSS Mayar Mardan
- 25) Saif Ullah, The Bank of Khyber Near Afalah Bank Battagram, SS (IT) BS-17 GHSS Batagram.
- 26) Muhammad Siddiq, PO Zando Dheri Mohib Banda Tehsil & Distt: Mardan, SS (IT) BS-17 GHSS Shahbaz Garhi, Mardan.
- 27) Sajid Amin, Mohallah Kooz Cham Village and Post Office Tehsil Lahor, District Swabi, SS (IT) BS-17 GHSS Ismaila Swabi
- 28) Majid Khan, SST IT, GHS Baidra Mansehra
- 29) Majid Khan SS IT, Jabbori Mansehra
- 30) Farooq Ahmad, Cantonment Board Staff Colony H.No C-18 Kamra Cantt. Tehsil & Distt Attock, SS (IT) BS-17 GHSS Rashakai, Nowshera.
- 31) Nisar Ahmed SS IT, GHSS Chanda Khurram Karak
- 32) Irfan Ahmad, Village and Post Office Mian Khan Mardan City Mardan, SS (IT) BS-17 GHSS Kohi Barmol, Mardan.
- 33) Tahir Saleem SS IT, GHSS Nari Panoos Karak
- 34) Qaisar Shah, Village P/O and Tehsil Tangi Mohallah Gul Bagh Nasrat Zai, District Charsadda, SS (IT) BS-17 GHSS Muhammad Nari, Charsadda.
- 35) Fazli Rabi, Mohallah Combokhel, Village and Post Office Jowar, Tehsil Daggar, Buner, SS (IT) BS-17 GHS Shamdarfa, Oghi, Mansehra.
- 36) Faisal Rehman, Village and Post Office Jhangra, Tehsil Havelan District Abbotabad, SS (IT) BS-17 GHSS Jatti Pind Haripur.



Appellant

through



Inayat Ullah Khan
 Advocate Supreme Court.
 LL.M (U.K)

Appointment Order of Male IT Teachers (BPS-16)



**IT/Computer Science Teachers and Computer Labs
Project in Khyber Pakhtunkhwa (Phase-II)**
Elementary & Secondary Education Department
Government of Khyber Pakhtunkhwa

Dated Peshawar the September 12, 2014

NOTIFICATION:

No.PM-IT/E&SE/1-3/Recruitment/IT-Male/2014. Consequent upon recommendations of Departmental Selection Committee, the following Fifty Eight (58) Male Candidates are hereby appointed as IT Teachers in BPS-16 (Rs. 10000-800-34000) plus usual allowances as admissible under the rules purely on contract basis with immediate effect from the date of their taking over charge up to 30-06-2015 or till the completion of the project whichever is earlier on the terms and conditions given at the end.

2. Upon their appointment as IT Teachers (BPS-16), they are posted against the vacant posts under the project "IT/Computer Science Teachers and Computer Labs Project in Khyber Pakhtunkhwa" in the Schools noted against their names:-

S#	Name	Father Name	Domicile	Contact Address	Name of School where Posted
1	Yasir Khan	Misal Khan	Abbottabad	H 02 Officer Colony, Khyber Textile Mills, Baldher, Haripur, NIC#: 13302-3489519-5	GHS Kuthiala, Abbottabad
2	Faisal Rehman	Miandad	Abbottabad	Village and Post Office Jhangra, Tehsil Havelian District Abbottabad, NIC#: 13101-5957063-9	GHS No.1 Havelian, Abbottabad
3	Jamal Zafar	Zafar Ishaq	Abbottabad	House No. 340, The Mall Road, Abbottabad, NIC#: 13101-4894733-9	GHS Samundar Kalha, Abbottabad
4	Gul Nawar Khan	Raza Khan	Bannu	AEC Academy for Engineering Courses, Behind Jabir Flates, Arbab Road, Peshawar, NIC#: 11101-9104233-7	GHS No.1 Bannu City
5	Jamshed Ahmad	Syed Ghulam	Bannu	Village Bander Killa, Post Office Azim Killa, Tehsil Domel, District Bannu, NIC#: 11101-4109215-5	GHS Azim Killa, Bannu
6	Muhammad Muneeb	Muhammad Hayat Khan	Bannu	M-Hayat and Sons Jewellery Box Center, Tehsil Bazar Bannu City, NIC#: 11101-7278905-7	GHS No.2 Bannu City
7	Saif Ullah	Amir Muhammad Khan	Battagram	The Bank of Khyber Near Alfalah Bank, Battagram, NIC#: 13202-5026731-9	GHS Dagai, Battagram
8	Ashfaq ur Rahman	Sharif ur Rahman	Bunner	Mohallah Wasta Khail Village and Post Office Torwarsak, Tehsil Daggar, Bunner, NIC#: 15101-0788182-5	GHS Karapa, Bunner
9	Fazli Rabi	Fazal Raziq	Bunner	Mohallah Combokhel, Village and Post Office Jowar, Tehsil Daggar, Bunner, NIC#: 15101-0134774-7	GHS Dagai, Bunner
10	Muhammad Irfan	Muhammad Javid Khan	Charsadda	Tehsil Post Office Shah Village Azeem Khan Michani Road, Charsadda, NIC#: 17103-0345196-9	GHS Shabqadar Fort, Charsadda
11	Faiz Ullah	Gul Zarif	Charsadda	Village and P/O Gul Abad Mera, Tehsil and District Charsadda, NIC#: 17101-5704611-5	GHS Kato Zai, Charsadda
12	Ihtesham ul Haq	Muhammad Shams ur Rahman	Charsadda	Garhi Hameed Gul, Tehsil and District Charsadda, NIC#: 17101-7898848-9	GHS No.1 Rajjar, Charsadda
13	Qaisar Shah	Zamarud Shah	Charsadda	Village P/O and Tehsil Tangi Mohallah Gul Bagh Nasrat Zai, District Charsadda, NIC#: 17102-7975287-1	GHS Battagram, Charsadda
14	Tanzeel ur Rehman	Ubaidullah	Chitral	House No. 03, Street No. 01, Near Masjid Sharia Tamma New Abadi, Post Office Taryikalan, Islamabad, NIC#: 15201-2624012-1	GHS Mastuj, Chitral
15	Kifayatullah	Inayatullah	D.I.Khan	Mohallah Khatkian Wala, D.I.Khan, NIC#: 12101-0897784-1	GCMHS No. 1, D.I Khan
16	Shehzada Mudassar Usman	Hafeez Ullah	D.I.Khan	Molvi Ahmad Saeed, Mohallah Hidmat Garanwala, D.I.Khan, NIC#: 12101-0522588-9	GHSS No.1 Paharpur, D.I.Khan
17	Wasim Abbas	Ghulam Akbar	D.I.Khan	Rindh Baloch House, Indus River Bank Road Kachi Paid Khan, D.I.Khan, NIC#: 12101-0823294-5	GHS Bilot Sharif, D.I.Khan
18	Amin ur Rahman	Taj Muhammad	Dir Lower	Village Stanadar, Tehsil Balambat, Post Office Timergara, C/O Aziz Medical Store Balakout, Timergara, NIC#: 15306-8701618-1	GHS Rabat, Dir Lower
19	Shah Zamin	Gul Zamin	Dir Lower	Village Kaso P/O Ouch Tehsil Adenzai District Dir Lower, NIC#: 15307-4032774-1	GHSS Chakdara, Dir Lower
20	Khush Dil	Asfandyar	Dir Upper	Village Maira P/O Sahib Abad, Tehsil Wari, Dir Upper, NIC#: 15702-5904046-1	GHS Nehag, Dir Upper
21	Muhammad Zaheer Rahar	Muhammad Yousaf	Haripur	Yousaf Brothers Sewiry Machine Dedar Main Bazar, Haripur, NIC#: 13302-4860203-5	GHS Central Jail, Haripur

Attested to True copy

Appointment Order of Male IT Teachers (BPS-16)

13

22	Muhammad Tahir	Afzal Haq	Karak	NIPCONS Campus NUST Tameezuddin Road, Lalkurti, Rawalpindi, NIC#: 14203-2050998-1	GHS Ahmadi Banda, Karak
23	Nimat Ullah	Fauz Dar Khan	Karak	House No. 55, Opposite New Tribal Girls Hostel, University of Peshawar, Peshawar, NIC#: 17301-5262644-7	GHS Takhti-e-Nasrati, Karak
24	Jamshaid Khan	Darwaish Khan	Kohistan	Village Jijal Post Office Ranolia, Tehsil Pattan District Kohistan, NIC#: 13403-3191864-1	GHS Pattan, Kohistan
25	Abdul Waheed Khan	Ghulam Khan	Lakki Marwat	Central Science Degree College Peshawar Cantt, Peshawar, NIC#: 11201-8834104-7	GHS Ahmad Khel, Lakki Marwat
26	Waqas ul Islam	Farman Ali Shah	Malakand	Farman Concrete Industries, Farman Abad Village Kharkai P/O Dargai, Malakand, NIC#: 15401-7657332-5	GHS Thana No.1, Malakand
27	Muhammad Junaid Iqbal	Muhammad Iqbal	Mansehra	Mohallah Chichriali, Mansehra, NIC#: 13503-4825758-7	GCMHS No. 3, Mansehra
28	Saad Hameed	Abdul Hameed	Mansehra	House No. 06, Faisal Colony, Abbottabad Road, Mansehra, NIC#: 13503-3074019-5	GHS Baidra, Mansehra
29	Sarfraz Ahmad	Faqir Muhammad	Mansehra	Village and P/O Sher Garh, Tehsil Oghi, District Mansehra, NIC#: 13504-4494618-9	GHS Dilbori, Mansehra
30	Zakir Khan	Muhammad Yousaf	Mansehra	New Institute of Professional Opposite Main Gate, Haar University, Mansehra, NIC#: 13503-3539674-9	GHS Shamdhara, Mansehra
31	Muhammad Javed Shad	Shad Muhammad Khan	Mansehra	Assistant, P&D Section, KP Forest Department, Shami Road, Peshawar City, NIC#: 13501-6913193-7	GHS Shohal Maaazullah, Mansehra
32	Umair Awan	Wali Dad	Mansehra	House No.F -786 Near Tariq G S Dub Number 01, Mansehra, NIC#: 13503-1696127-1	GHS Bajna, Mansehra
33	Sagheer Ahmad Jan	Ghulam Jan	Mansehra	Sagheer MCCS IT Department, Hazara University of Mansehra, Mansehra, NIC#: 13503-8059201-9	GHSS Phulra, Mansehra
34	Majid Ali	Sarfraz	Mardan	C/O Javed Khan, GHS Sari Behloi, Takht Bhai, Mardan, NIC#: 16102-1411686-5	GHS Naseer Killi, Mardan
35	Naveed Qasim	Said Qamresh	Mardan	Asif Book Seller, New Swabi Road, Mardan, NIC#: 16101-5439664-9	GHS Gul Bagh (Hoti), Mardan
36	Abdul Manan	Ghulam Rahim	Mardan	Village and P/O Char Choor, Tehsil Katlang, District Mardan, NIC#: 16101-1205103-7	GHS Badar Banda, Mardan
37	Naseer Khan	Misri Khan	Mardan	Mohallah Seray Korana, Post Office Box Baghdada, Mardan, NIC#: 16101-6858369-1	GCMHS No.3, Mardan
38	Muhammad Siddiq	Sardar Muhammad	Mardan	The City School, Mardan Campus, Mardan, NIC#: 16101-5831929-9	GHS Gumbat, Mardan
39	Usman ud Din	Charagh Din	Mardan	C/O Charagh Din, Asal Din Banda, Village and Post Office Sher Garh, Tehsil takht Bhai, District Mardan, NIC#: 16102-2278422-5	GHS Sher Garh, Mardan
40	Irfan Ahmad	Anwar Khan	Mardan	Village and Post Office Mian Khan, Mardan City, Mardan, NIC#: 16101-7024394-9	GHS Rustam, Mardan
41	Fazan ul Haq	Ata ul Haq	Nowshera	Mohallah Char Soo, Village and Post Office Ziarat Kaka Sahib, Nowshera, NIC#: 17201-2136509-7	GHS Dak Ismail Khel, Nowshera
42	Imran Pervez	Pervez Ahmad Khan	Nowshera	Mohallah Akhun Din Baba, Village and Post Office Akora Khattak, Nowshera, NIC#: 17201-9346841-1	GHS No. 2, Nowshera Cantt
43	Farooq Ahmad	Gulnar Din	Nowshera	C/O Dr. Khana Din Khattak, Dobandi Jehangira, Nowshera, NIC#: 17201-8166639-7	GHS Misri Banda, Nowshera
44	Naseer Muhammad	Ahmad Gul	Peshawar	C/O Hayat Muhammad Staff Colony, Board of Intermediate and Secondary Education, Peshawar, NIC#: 17301-2329206-7	GHS Gulshan Rehman Colony, Peshawar
45	Muhammad Imran	Muhammad Rafiq	Peshawar	Village Kochian, Post Office Gul Bela, District Peshawar, NIC#: 17301-1596934-1	GHS Tarnab Farm, Peshawar
46	Zeeshan Sohail	Mukhtar Ahmed Sohail	Peshawar	House No. 885 Near Jammata e Islami Office, Mohallah Islamabad, NIC#: 17301-1991193-1	GHS Landi Arbab, Peshawar
47	Kashif Khan	Umara Khan	Peshawar	Street No. 03, Gharib Abad, Tehkal Bala, Peshawar, NIC#: 17201-6709810-3	GHS Mathra, Peshawar
48	Fayaz Ali	Maraj Khan	Shangla	Village Sanila, Tehsil Pura, P/O Sundovi, District Shangla, NIC#: 15505-5310232-7	GHS No.2 Alpurai, Shangla
49	Faisal Rehman	Abdul Rehman	Swabi	Link Road Swabi, P/O Box Swabi, District Swabi, NIC#: 16202-5338977-3	GHS Panj Pir, Swabi
50	Hamid Zada	Rahim Zada	Swabi	Village and P/O: Gabasni Gadoon Area, Tehsil Topi, District Swabi, NIC#: 16202-1488165-5	GHS Pabaini, Swabi
51	Sajid Amin	Iqbal ud Din	Swabi	Mohallah Kooz Cham Village and Post Office Tehsil Lahor, District Swabi, NIC#: 16201-5314575-7	GHS Lahor Sharqi, Swabi
52	Mehboob Ahmad	Hafiz ur Rehman	Swabi	Mohallah Chino, Village and Post Office Tehsil Topi, District Swabi, NIC#: 16202-8302001-9	GHS Shah Mnsoor, Swabi
53	Hamid Bacha	Mian Jamee Uddin	Swabi	Mohallah Madina Masjid, Village Sadher Tehsil Rozar, District Swabi, NIC#: 16201-0721748-1	GHS Lahor Gharbi, Swabi
54	Bakht Azam	Ali Akbar	Swat	Bakht Azam S/O Ali Akbar C/O Kohistan Jewellers, Main Bazar Khwaza Khela, Swat, NIC#: 15602-0490712-3	GHS Mingora No.1, Swat
55	Israr Ahmad	Hazrat Ahmad	Swat	Mohallah Mia Gano Cham Post Office and Village Saidu Sharif, Swat, NIC#: 15602-5149099-7	GHS Islampur, Swat
56	Faisal Ahmad	Muhammad Ahmad	Swat	Village Damana, Post Office Madyan, District Swat, NIC#:	GHS Nawakalav

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Appointment Order of Male IT Teachers (BPS-16)

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57	Izaz	Raza Khan	Swat	Room No. 72, Hostel No. 09, University of Peshawar, Peshawar, NIC#: 15602-0615017-1	GHS Qalagay, Swat
58	Muhammad Shahid Kamal	Umar Hayat	Tank	M. Shahid Kamal C/O Saeed ur Rehman Officer The Bank of Khyber, IBB Tank Ada, DI.Khan, NIC#: 12201-1881795-7	GCMHS NO. 1, Tank

TERMS AND CONDITIONS:

1. Their appointment is purely on contract basis and they will have no claim/right what so ever for regularization etc. Their services under the present contract shall not qualify them for pension/gratuity.
2. Their services can be terminated at one month notice without any reason. In case they wish to resign at any time, one month's notice will be necessary or in Lieu thereof one month's pay shall be forfeited.
3. Their services will be liable to termination without any notice if their performance is not found satisfactory subsequently.
4. They will produce a medical certificate of fitness from the concerned Civil Surgeon/Medical Superintendent.
5. They will be governed by Provincial Government Rules concerning contract appointment as amended from time to time.
6. Their academic documents will be verified by the District Education Officer (Male) concerned. If found fake their services will be terminated and they will be proceeded against under the law.
7. Their pay will be released subject to the condition that their academic documents are verified by the District Education Officer (Male) concerned.
8. Their appointments are School based and non-transfer able.
9. Their joining time of this offer is 30 days failing which, the offer will stand cancelled and the next candidate on merit list will be considered for appointment.
10. They will submit Charge Report to all the concerned.

Note:-

- i. Notification can be downloaded from the E&SE Department website www.kpese.gov.pk
- ii. No TA/DA will be allowed to the appointees for joining their duty.

PROJECT MANAGER,
IT/COMPUTER SCIENCE TEACHERS AND COMPUTER LABS
PROJECT (PHASE-II), E&SE DEPARTMENT, GOVERNMENT OF
KHYBER PAKHTUNKHWA

Copy for Information to:

1. Accountant General of Khyber Pakhtunkhwa Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officers Concerned.
4. District Education Officers (Male) Concerned.
5. Principals/Head Mistress of the Schools Concerned.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PA to Additional Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. PA to Chief Planning Officer, E&SE Department, Khyber Pakhtunkhwa.
9. Official concerned.

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(SALAHUDDIN)
PROJECT MANAGER



" B "

(15)

ANNEXURE B

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA**

NOTIFICATION

In pursuance of Section-2 of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) (Amendment) Act, 2018 (Khyber Pakhtunkhwa Act No. 11 of 2019) read with Section-1 of the Act ibid and SO(S/NJE&SED/185/SS-IT/2018/19 dated 13/02/2019, the services of the following 45 (Forty Five) Male Information Technology Teachers re-designated as Secondary School Teacher (IT) in Elementary & Secondary Education Department are hereby regularized in (BPS-16) from their initial appointment on the below mentioned terms and conditions:

ABBOTTABAD

S#	Name	Father Name	Domicile	School	Date of Initial Appointment
1	Faisal Rehman	Miandad	Abbottabad	GHS No.1 Havelian, Abbottabad	12-09-2014

BANNU

1	Gul Nawar Khan	Raza Khan	Bannu	GHS No.1 Bannu City	12-09-2014
2	Jamshed Ahmad	Syed Ghulam	Bannu	GHS Azim Killa, Bannu	12-09-2014
3	Muhammad Muneeb	Muhammad Hayat Khan	Bannu	GHS No.2 Bannu City	12-09-2014

BATTAGRAM

1	Saif Ullah	Amir Muhammad Khan	Battagram	GHS Dagal, Battagram	12-09-2014
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BUNER

	Fazli Rabi	Fazal Raziq	Buner	GHS Dagal, Buner	12-09-2014
2	Asthaq Ur Rahman	Sharif Ur Rahman	Buner	GHS Karepa, Buner	12-09-2014

CHARSADDA

1	Muhammad Irfan	Muhammad Javid Khan	Charsadda	GHS Shabqadar Fort, Charsadda	12-09-2014
2	Qaisar Shah	Zamarud Shah	Charsadda	GHS Battagram, Charsadda	12-09-2014
3	Faiz Lillah	Gul Zarif	Charsadda	GHS Kato Zai, Charsadda	12-09-2014
4	Adnar Khan	Muhammad Ibrahim	Charsadda	GHS No.1 Rajjar, Charsadda	12-09-2014

DERA ISMAIL KHAN

1	Kifayatullah	Inayatullah	D.I.Khan	GCMHS No. 1 D.I.Khan	12-09-2014
2	Muhammad Amir Shah	Ghulam Akbar Shah	D.I.Khan	GHS Bilal Sharif, D.I.Khan	17-11-2014

DIR LOWER

1	Qaisar Khan	Nawab Khan	Dir Lower	GHSS Chekdara, Dir Lower	17-11-2014
2	Amin Ur Rahman	Taj Muhammad	Dir Lower	GHS Rabat, Dir Lower	12-09-2014

DIR UPPER

1	Khush Dil	Asfandyar	Dir Upper	GHS Nehag, Dir Upper	12-09-2014
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S#	Name	Father Name	Domicile	School	Date of Initial Appointment
HARIPUR					
1	Muhammad Zaheer Babar	Muhammad Yousaf	Haripur	GHS Central Jail, Haripur	12-09-2014
KARAK					
1	Tahir Saleem	Awal Muhammad	Karak	GHS Takmil-e-Nasrati, Karak	17-11-2014
2	Nisar Ahmed	Momeen Khan	Karak	GHS Ahmadi Banda, Karak	17-11-2014
KOHISTAN					
1	Namat Ullah	Saeed Ullah	Kohistan	GHS Pattan, Kohistan	17-11-2014
MALAKAND					
1	Waqas Ul Islam	Farman Ali Shah	Malakand	GHS Thana No.1, Malakand	12-09-2014
MANSEHRA					
1	Zakir Khan	Muhammad Yousaf	Mansehra	GHS Shamdhara, Mansehra	12-09-2014
2	Umair Awan	Wali Dad	Mansehra	GHS Bajna, Mansehra	12-09-2014
3	Majid Khan	Muhammad Ajmal	Mansehra	GHS Shohal Maazullah, Mansehra	17-11-2014
4	Muhammad Junaid Iqbal	Muhammad Iqbal	Mansehra	GCMHS No. 3 Mansehra	12-09-2014
5	Majid Khan	Behram Khan	Mansehra	GHS Baidra, Mansehra	17-11-2014
6	Sarifraz Ahmad	Faqir Muhammad	Mansehra	GHS Dilbari, Mansehra	12-09-2014
MARDAN					
1	Irfan Ahmad	Anwar Khan	Mardan	GHS Rustam, Mardan	12-09-2014
2	Muhammad Siddiq	Sardar Muhammad	Mardan	GHS Gumbat, Mardan	12-09-2014
3	Abdul Manan	Ghulam Rahim	Mardan	GHS Badar Banda, Mardan	12-09-2014
4	Majid Ali	Sarifraz	Mardan	GHS Naseer Killi, Mardan	12-09-2014
5	Naseer Khan	Misri Khan	Mardan	GCMHS No.3 Mardan	12-09-2014
NOWSHERA					
1	Farooq Ahmad	Gulnar Din	Nowshera	GHS Misri Banda, Nowshera	12-09-2014
2	Imran Pervez	Pervez Ahmad Khan	Nowshera	GHS No. 2 Nowshera Canal	12-09-2014
PESHAWAR					
1	Zeesan Sohail	Mukhtar Ahmed Sohail	Peshawar	GHS Landi Arbab, Peshawar	12-09-2014
2	Naseer Muhammad	Ahmad Gul	Peshawar	GHS Gulshan Rehman Colony, Peshawar	12-09-2014
3	Sohail Ahmad	Muhammad Akram	Peshawar	GHS Tamab Farm, Peshawar	17-11-2014
4	Yasin Shah	Hussain Shah	Peshawar	GHS Malthra, Peshawar	08-12-2014
SHANGLA					
1	Fayaz Ali	Maraj Khan	Shangla	GHS No.2 Alpural, Shangla	12-09-2014

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S#	Name	Father Name	Domicile	School	Date of Initial Appointment
SWABI					
1	Sajid Amin	Iqrar Ud Din	Swabi	GHS Lahor Sharqi, Swabi	12-09-2014
2	Mehboob Ahmad	Hafiz Ur Rehman	Swabi	GHS Shah Mnsoor, Swabi	12-09-2014
3	Hamid Bacha	Mian Jamee Uddin	Swabi	GHS Lahor Gharbi, Swabi	12-09-2014
SWAT					
1	Izaz	Raza Khan	Swat	GHS Qalagay, Swat	12-09-2014
2	Bakht Azam	Ali Akbar	Swat	GHS Mingora No.1, Swat	12-09-2014
TANK					
1	Muhammad Shahid Kamal	Umar Hayat	Tank	GCMHS NO. 1 Tank	12-09-2014

Terms and Conditions:

1. The employees shall have held their posts validly till the 30-06-2017.
2. The regularization will not be in favour of those IT Teachers, who left the Department/ remained absent from duty or resign from service prior or on 30-06-2017 and also not in favour of those IT Teachers who have under disciplinary proceedings.
3. The DEO (Male) concerned is required to ensure the last Pay Roll, Duty Certificate of the IT Teachers concerned before handing over charge.
4. They shall possess the same qualification and experience as required for a regular post.
5. Their services are regularized with effect from their initial appointment in BPS-16.
6. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servant Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturer, Instructor and Doctors) Regularity Act, 2011 and such rules and regulations as may be issued from time to time by the Government.
7. They have not resigned or terminated from their services on account of misconduct, in efficiency or any other ground, before 30-06-2017.
8. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadre.
9. They shall rank junior to all other employees belonging to the same Cadre, who are in service on regular basis on the commencement of this Act, and shall also junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the Cadre, irrespective of their actual date of appointment.
10. The seniority inter-se of those employees, whose services are regularized under this Act within the cadre, shall be determined on the basis of their continuous service in Cadre.

Director

Endst: No. 2435-43 /File No.02/IT Teachers regularization Dated Peshawar the 8/3/ 2019.

1. Accountant General of Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. Deputy Director EMIS/Project Manager-IT, E&SE Department.
6. PS to Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
7. PA to Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
8. Official Concerned.
9. Master File.

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[Signature]
 Deputy Director (Estab)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

Annexure C

PAKISTAN National Identity Card

Name: **Hamid Bacha**

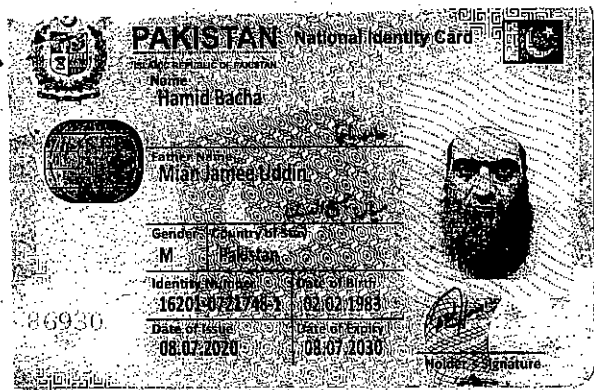
Father Name: **Mian Jameel Ud Din**

Gender: **M** Country: **Pakistan**

Identity No: **1620187217451** Date of Birth: **02.02.1983**

Date of Issue: **08.07.2020** Date of Expiry: **08.07.2030**

Holder's Signature

A scan of a Pakistani National Identity Card. The card features a portrait of a man with a beard and glasses. It includes personal details such as name, father's name, gender, country, identity number, date of birth, date of issue, and date of expiry. The card number 86930 is visible on the left side.

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"A"

ANNEXURE D

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19

**THE KHYBER PAKHTUNKHWA EMPLOYEES OF THE ELEMENTARY &
SECONDARY EDUCATION DEPARTMENT (APPOINTMENT AND
REGULARIZATION OF SERVICES) ACT, 2017.**

(KHYBER PAKHTUNKHWA ACT NO. I OF 2018)

CONTENTS

PREAMBLE

SECTIONS:

1. Short title, application, extent and commencement.
2. Definitions.
3. Regularization of services of employees.
4. Determination of seniority.
5. Overriding effect.

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**THE KHYBER PAKHTUNKHWA EMPLOYEES OF THE ELEMENTARY AND
SECONDARY EDUCATION DEPARTMENT (APPOINTMENT AND
REGULARIZATION OF SERVICES) ACT, 2017.**

(KHYBER PAKHTUNKHWA ACT NO. I OF 2018)

*(First published after having received the assent of the Governor of
the Khyber Pakhtunkhwa in the Gazette of Khyber Pakhtunkhwa,
(Extraordinary), dated the 8th January, 2018).*

**AN
ACT**

*to provide for the appointment and regularization of the services of certain employees
appointed on adhoc or contract basis or appointed in certain projects in the Elementary
and Secondary Education Department in
the Province of the Khyber Pakhtunkhwa.*

WHEREAS it is expedient to provide for the appointment and regularization of the services of certain employees appointed on adhoc or contract basis or appointed in certain projects in the Elementary and Secondary Education Department in the Province of the Khyber Pakhtunkhwa, in the public interest;

It is hereby enacted as follows:

1. Short title, application and commencement.—(1) This Act may be called the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017.

(2) It shall apply to all the employees in the Elementary and Secondary Education Department, as defined in clause (c) of sub-section (1) of section 2 of this Act.

(3) It shall come into force at once and it shall be deemed to have taken effect from the date of the initial appointment of the employees as referred to in clause (c) of sub-clause (1) of section 2 of this Act.

2. Definitions.—(1) In this Act, unless the context otherwise requires,—

- (a) “Commission” means the Khyber Pakhtunkhwa Public Service Commission;
- (b) “contract appointment” means appointment of a duly qualified person for a specific period made otherwise than in accordance with the prescribed method of recruitment;
- (c) “employees” mean duly qualified persons,—

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(21)

- (i) who are appointed as teachers on adhoc or contract basis by the Government after 2013 through National Testing Service but does not include the teachers engaged on work charge basis or who are paid out of contingencies;
- (ii) who are appointed in the projects on contract basis in accordance with the project policy; and
- (iii) who are appointed as Junior Clerk in the Elementary and Secondary Education Department by Government after 2013 through National Testing Service;
- (d) "Government" means the Government of the Khyber Pakhtunkhwa;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants;
- (f) "project" means,-
 - (i) IT/Computer Teachers in Computer Labs Projects in Khyber Pakhtunkhwa (Phase-II);
 - (ii) establishment of five hundreds (500) IT Labs in Government High and Secondary Schools in Khyber Pakhtunkhwa; and
 - (iii) establishment of five hundreds (500) IT Labs in Government High Schools in Khyber Pakhtunkhwa (Phase-III); and
- (g) "teacher" means a teacher of primary, middle, secondary or higher secondary school.

(2) The expressions "adhoc appointment" shall have the same meaning as respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. Regularization of services of employees.---(1) Notwithstanding anything contained in any other law or rules, the employees, who hold posts till the commencement of this Act¹ [or till 30th June 2017, in respect of the project as mentioned in sub-clause (i) of clause (f) of sub-section (1) of section 2 of this Act, as the case may be], shall be deemed to have been validly appointed on regular basis from the day of the **initial appointment**; provided that-

- (i) they possess the same qualification and experience required for a regular post;

¹ Inserted vide Khyber Pakhtunkhwa Act No. II of 2019.

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- (ii) they have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground, before the commencement of this Act¹[:]

²[Provided that expiry of the project as mentioned in sub-clause (i) of clause (f) of sub-section (1) of section 2 of this Act, shall not be deemed a ground for non-appointment of an employee on regular basis under this Act; and]

- (iii) the service promotion quota of all service cadres shall not be affected.

(2) The services of the employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

4. Determination of seniority.---(1) The employees whose service are regularized under this Act or in the process of attaining service at the commencement of this Act, shall rank junior to all other employees belonging to the same Cadre, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the Cadre, irrespective of their actual date of appointment.

(2) The seniority inter-se of those employees, whose services are regularized under this Act within the Cadre, shall be determined on the basis of their continuous service in Cadre:

Provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

5. Overriding effect.--- Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules to the extent of inconsistency to this Act shall cease to have effect.

¹ Replaced vide Khyber Pakhtunkhwa Act No. II of 2019.

² Inserted vide Khyber Pakhtunkhwa Act No. II of 2019.

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ANNEXURE

E

To,

The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

Objection petition against the tentative seniority list SST (BPS-16) IT as
stood on 31.12.2021

Sir,

Brief facts giving rise this objection petition are as under

I was appointed on 12.09.2014 as IT teacher BPS-16 (re-designated as
SST-IT) and regularized under the KP regularization Act, 2018.

The notification of regularization was issued on 08.03.2019.

I was placed at serial No. 68 of seniority list of BPS-16 SST-IT however my
correct serial No. is 37. The Tentative Seniority list of SST-IT (BPS-16) was
prepared on basis of aggregate marks obtained by the candidates at the time of
appointment through NTS whereas the criteria for determination of inter-se
seniority as per section 4 sub section 2 regularization Act, 2018.

That "The seniority inter-se of those employees whose services
are regularized under this act within the cadre shall be determined on
the basis of their continuous service in the cadre; provided that if the dated
of continuous service in the case of two or more employees in the same,
the employee older in age shall rank senior to the younger one"

Keeping in view what has been stated, it is therefore requested to award me
a correct place in the tentative and final seniority list of SST-IT (BPS-16).

I shall be placed at serial No. 37 instead of 68 and also be considered for
promotion to BPS-17 in the light of correct serial No. 37.

Hamid Baiche

Date: 10.01.2023

SST-IT-BPS-16

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24 ANNEXURE E/1

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DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

TENTATIVE SENIORITY LIST OF SST IT BPS-16 IN ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA AS STOOD ON 31/12/2021

S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declaration Date	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry Into Edu:Deptt	Date of Apptt as SST (IT)	Remarks
1	21201-8885744-9	Muhammad Ilyas	Ezat Khan	MCS, MS (Comp) B Ed	KHYBER	2020	GHS Kohi Sher Haider Khyber	11-04-81		14-06-05	14-06-05	Differed in previous DPC
2		Nisar Khan	Ismail Khan	M.Sc	KHYBER		GHS Pindi Lalma	20-11-83		14-06-05	14-06-05	Differed in previous DPC
3	12201-1680433-7	Sami Ullah	Moin Khan	B.Sc B Ed	SOUTH WAZIRISTAN	2015	GHS Spinkai	31-03-83		14-06-05	14-06-05	Differed in previous DPC
4	15103-7937471-5	Sagheer Ahmad	Akram Khan	M.Sc CS, B.Ed	KHYBER	2020	GHS Shagai	04-03-82		04-09-06	04-09-06	Differed in previous DPC
5	21303-2530595-9	Iqar Hussain	Munir Hussain	M.Sc (Comp) B.Ed	Kurram	2013	GHS Israr Shaheed Kurram	05-04-85		14-10-06	14-10-06	Differed in previous DPC
6	11101-8235769-3	Abd Nawaz	Rahim Nawaz	B.Sc, B.Ed	BANNU	2013	GHS Shahoor s/w	12-10-86		09-02-08	09-02-08	Differed in previous DPC
7	21103-8831093-8	PARVEZ KHAN	SHARIF KHAN	B.SC, B.Ed	BAJAUR	2017	GHS INAYAT KILLI BAJAUR	15-11-81		09-02-08	09-02-08	Differed in previous DPC
8	21506-4367367-5	Bashir Ahmad	Muhammad Yasin	B.Sc	NORTH WAZIRISTAN		GHS Miranshah	03-01-87		09-02-08	09-02-08	Differed in previous DPC
9		Fayaz Ahmad	Muhammad Yaqoob Khan	B.Sc	Mohmand		GHS Danish Kool	16-04-89		09-02-08	09-02-08	Differed in previous DPC
10	15601-1417186-7	HALIMUR RASHID	MUHAMMAD AFSAR KHAN	MSCIT BED	SWAT	2012	GHSS SIJBAN	10-01-78		26-06-06	01-07-09	Differed in previous DPC
11	16202-3898172-9	Sohail Irfan	Muhammad Ayub	BCS	Swabi		GHS Gandaf	24-08-73		01-07-07	01-07-07	Differed in previous DPC
12	17102-0537958-3	Mehroz Khan	Shamroz Khan	M.SC Maths, M.Ed	Mohmand	2012	GHS Gulabad Tangi charsadda	14-03-85		13-09-11	13-09-11	Differed in previous DPC
13	21303-5586825-9	Syed Rafiq Hussain	Syed Mushtaq Hussain	M.Sc (Comp) B.Ed	Kurram	2015	GHS Zeran Kurram	01-04-89		01-03-12	01-03-12	Differed in previous DPC
14	21303-6825621-9	Asad Ali	Sardar Hussain	M.Sc (Comp) B.Ed	Kurram	2015	GHS Kirman	06-02-89		27-03-12	27-03-12	Differed in previous DPC
15	11101-7304357-1	ANWARULLAH	HAR DIL KHAN	MSC (CS) B.ED	BANNU	2008	GOVT SHAHEED ABDUL AZAM AFRIDI HIGHER	09-09-85		14-01-11	20-10-14	PSC KPK

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S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declaration Date	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Dept	Date of Apptt as SST (IT)	Remarks
16	22201-628044-9	SYED UMER KHAN	S/O AMANULLAH	MCS B ED	BANNU	2006	GHSS NADIR BODIN KHEL BANNU	01-05-82		20-10-14	20-10-14	PSC KPK
17	12131-0938863-1	ATTA UR REHMAN	GUL MUHAMMAD	MCS M.ED	DI KHAN	2004	GHSS DARABAN KALAN	05-02-83		17-05-14	20-10-14	PSC KPK
18	15503-2341653-3	ZAHEER AHMED	MUHAMMAD ARIF	MCS / BED	MANSEHRA	2012	GHS NO.2 MANSEHRA	18-01-80		20-10-14	23-12-14	PSC KPK
19	21537-5519152-3	KHALIL UR REHMAN KHAN	QANDAHAR	MCS B ED M ED	NORTH WAZIRISTAN	2007	GHS RAZMAK CAMP NWTD	05-04-84		19-11-14	19-11-14	PSC KPK
20	15132-8383735-3	Farman Ali	Habib Ur Rehman	MS CS B Ed	MARDAN	2011	Govt. Shafeed Muhammad Ali High School Tori	24-04-86		20-10-14	20-10-14	PSC KPK
21	13127-5554010-5	IFTIKHAR AHMAD	S/O MUHAMMAD ASLAM	MSc(CS) MED	ABBOTTABAD	2011	GHS NO.3 ABBOTTABAD	02-03-78		20-10-14	20-10-14	PSC KPK
22	17101-0285443-7	MIAN NAVEED ULLAH JAN	MIAN FAZLI GHANI	M.SC CS B ED	CHARSADDA	2009	GHS Ibrahim Zai Charsadda	12-04-83		20-10-14	20-10-14	PSC KPK
23	12201-4884615-9	MUHAMMAD JAMSHID	S/O MATI UD DIN	MCS B.ED M.ED	SOUTH WAZIRISTAN	2011	GHS SARAKOGRHA SOUTH WAZIRISTAN	12-04-87		19-11-14	19-11-14	PSC KPK
24	21137-7585265-5	ZAHID ULLAH	GUL BADSHAH	MSc(CS) B.ED M.ED	BAJAUR	2011	GHS GHAZI BABA	08-05-88		20-10-14	20-10-14	PSC KPK
25	15503-0457599-9	NASR ULLAH KHAN	MOMIN KHAN	MSc(CS) MED	SWAT	2008	GHS ISLAMPUR	04-04-83		20-10-14	20-10-14	PSC KPK
26	12202-9319165-5	AMIR JAVED S/O	MUHAMMAD JAVED	MS COMP SC./MED	HARIPUR	2011	GHS KANGRA COLONY HARIPUR	09-09-84		02-10-12	20-10-14	PSC KPK
27	11201-0926331-9	FARHAT ULLAH KHAN	ASMATULLAH	MSc CS B.ED	LAKKI MARWAT	2012	GHS AHMAED KHEL	15-05-86		20-10-14	20-10-14	PSC KPK
28	21201-7280626-5	WAJID KHAN	AKRAM KHAN	MS/M PHIL (CS) M ED	KHYBER	2011	ASDEO Bara DEO Office Khyber	30-11-87		11-07-09	20-10-14	PSC KPK
29	11101-1455264-7	ZAHIDULLAH KHAN	MUHAMMAD NOOR ALI KHAN	MSCS BED	BANNU	2002	GHSS COMPREHENSIVE BANNU	14-12-77		16-04-05	11-12-15	PSC KPK
30	15132-1411356-5	MAJID ALI	SARFARAZ	MSCS BED	MARDAN	2013	GHS NASEER KILLI	15-03-83	96.00	12-09-14	12-09-14	EMIS Recruitment
31	11101-8104233-7	GUL NAWAR KHAN	RAZA KHAN	MSIT BED	BANNU	2014	GHS NO.1 BANNU CITY	15-02-83	95.00	12-09-14	12-09-14	

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S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declaration Date	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Deptt	Date of Apptt as SST (IT)	Remarks
32	15602-0490712-3	BAKHT AZAM	ALI AKBAR	MPHIL(CS) BED	SWAT	2013	GHS NO.1 MINGORA	20-04-80	91.00	12-09-14	12-09-14	
33	12101-0897784-1	KIFAYATULLAH	INAYATULLAH	BSIT B.ED	Di Khan	2013	GCMHS NO.1 DI KHAN	05-02-83	91.00	12-09-14	12-09-14	
34	11101-4109215-5	JAMSHED AHMAD	SYED GHULAM	MSCS BED	BANNU	2013	GHS AZIM KILLA	01-04-86	90.00	12-09-14	12-09-14	
35	11101-7278905-7	MUHAMMAD MUNEEB	MUHAMMAD HAYAT KHAN	BCS(HON) BED	BANNU	2010	GHS NO.2 BANNU CITY	04-04-87	90.00	12-09-14	12-09-14	
36	13503-4825758-7	MUHAMMAD JUNAID IQBAL	MUHAMMAD IQBAL	MSCS BED	MANSEHRA	2013	GCMS MANSEHRA	03-03-85	89.00	12-09-14	12-09-14	
37	17103-0345196-9	MUHAMMAD IRFAN	MUHAMMAD JAVID KHAN	MS(TELECOM & NET) MED	CHARSADDA	2012	GSSDHS SHABQADAR	03-02-88	88.00	12-09-14	12-09-14	
38	13504-4494618-9	SARFRAZ AHMAD	FAQIR MUHAMMAD	BCS HON/BED	MANSEHRA	2013	GHS DILBORI MANSEHRA	02-10-83	87.00	12-09-14	12-09-14	
39	15505-5310232-7	FAYAZ ALI	MARAJ KHAN	MSCS BED	SHANGLA	2012	GHS DHERAI PURAN	20-05-84	87.00	12-09-14	12-09-14	
40	15306-8701618-1	AMIN UR RAHMAN	TAJ MUHAMMAD	M.Phil (Comp-Sc) M.Ed B.Ed	DIR LOWER	2013	GGHS Rabat Lower Dir	08-03-85	87.00	12-09-14	12-09-14	
41	13503-3539674-9	ZAKIR KHAN	MUHAMMAD YOUSAF	MS COMP SC / MED	MANSEHRA	2017	GHS SHAMDARA OGH I MANSEHRA	03-09-87	87.00	12-09-14	12-09-14	
42	16101-1205103-7	ABDUL MANAN	GHULAM RAHIM	BSIT BED	MARDAN	2013	GHS BADAR BANDA	01-04-81	86.00	12-09-14	12-09-14	
43	15401-7657332-5	WAQAS UL ISLAM	FARMAN ALI SHAH	BSIT BED	MALAKAND	2013	GSASHS NO.1 THANA MALAKAND	20-05-89	86.00	12-09-14	12-09-14	
44	12201-1881795-7	MUHAMMAD SHAHID KAMAL	UMAR HAYAT	MCS MED	TANK	2009	GSSCMHS NO.1 TANK	11-04-82	85.00	12-09-14	12-09-14	
45	13503-1696127-1	UMAIR AWAN	WALI DAD	MS COMP SC/BED	MANSEHRA	2014	GHS BAJNA MANSEHRA	30-01-86	85.00	12-09-14	12-09-14	
46	15307-8872268-7	QAISAR KHAN	NAWAB KHAN	BSCS B.Ed	DIR LOWER	2016	GHSS CHAKDARA	01-02-86	85.00	17-11-14	17-11-14	

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Sl. No.	Roll No.	Name	Father Name	Qualification	Domicile	B.Ed Declaration Date	School/Institute/Office	Date of Birth	Merit Score	Date of Entry into Edu: Deptt	Date of Appt as SST (IT)	Remarks
47	17201-534541-1	IMRAN PERVEZ	PERVEZ AHMAD KHAN	MSC COMP SC.B Ed	NOWSHERA	2014	GHSS NO.2 NOWSHERA CANTT	21-04-86	85.00	12-09-14	12-09-14	
48	15102-530406-1	KHUSH DIL	ASFANDYAR	MPIL(CS) BED	DIR UPPER	2012	GHS GHANDIGAR	01-05-86	85.00	12-09-14	12-09-14	
49	15101-0758132-5	ASHFAQ UR RAHMAN	SHARIF UR RAHMAN	MSC COMP SC/BED	BUNER	2014	GHS KARAPA BUNER	01-04-88	85.00	12-09-14	12-09-14	
50	17101-570411-5	FAIZ ULLAH	GUL ZARIF	MS/ELEC & ELECTRONICS ENGI. BED	CHARSADDA	2013	GHS NO.1 RAJJAR	20-04-88	85.00	12-09-14	12-09-14	
51	17301-225205-7	NASEER MUHAMMAD	AHMAD GUL	MSC COMP SC/BED	PESHAWAR	2011	GHS GULSHAN REHMAN COLONY PESH	06-03-89	85.00	12-09-14	12-09-14	
52	16101-525205-1	NASEER KHAN	MISRI KHAN	MCS BED	MARDAN	2013	GCMHS NO.3	25-08-80	84.00	12-09-14	12-09-14	
53	17301-1591183-1	ZEEHAN SOHAIL	MUKHTAR AHMED SOHAIL	MSC CS B.ED M.ED	PESHAWAR	2012	GHS LANDI ARBAB	03-02-86	84.00	12-09-14	12-09-14	
54	17301-225205-4	SAF ULLAH	MUHAMMAD YOUSUF	BS(CS) B ED	BATTAGRAM	2013	GHS DAGAL BATTAGRAM	11-04-87	84.00	12-09-14	12-09-14	
55	16101-525205-6	MUHAMMAD SIDDIQ	SARDAR MUHAMMAD	MCS BED	MARDAN	2011	GHS GUMBAT	12-04-83	83.00	12-09-14	12-09-14	
56	17301-225205-7	SAJID AMAN	KOPAR UD DIN	MCS COMP SC/BED	SWABI	2011	GHS LAHOR SHARQI SWABI	24-09-85	83.00	12-09-14	12-09-14	
57	17301-225205-5	MUJIB KHAN	MUHAMMAD AMAL	MCS MED	MANSEHRA	2017	GHS SHOHAL MAZULLAH MANSEHRA	25-03-89	82.00	17-11-14	17-11-14	
58	17301-225205-7	MUJIB KHAN	BEHRAM KHAN	BS(CS) /BED	MANSEHRA	2011	GHS BAJDRA MANSEHRA	13-02-83	81.00	17-11-14	17-11-14	
59	17301-225205-7	FAZDUL HANID	GULNAR DIN	MBA BS COMP SC/BED	NOWSHERA	2016	GHS MISRI BANDA NOWSHERA	01-03-83	81.00	12-09-14	12-09-14	
60	17301-225205-7	MUJIB KHAN	MUNEEN KHAN	MCS MED	KARAK	2011	GHS AHMAD BANDA KARAK	15-02-85	81.00	17-11-14	17-11-14	
61	17301-225205-4	FAZDUL HANID	MUNIR KHAN	MCS BED	MARDAN	2016	GHS Rustan	22-07-88	81.00	12-09-14	12-09-14	
62	17301-225205-4	MUJIB KHAN	FAZDUL HANID	MCS COMP SC. B. ED	SWABI	2015	GHS SHAHMAJISOOR SWABI	05-12-81	79.00	12-09-14	12-09-14	

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S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declaratio n Date	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Deptt	Date of Apptt as SST (IT)	Remarks
63	17102-7975287-1	QAISAR SHAH	ZAMARUD SHAH	MSc(CS) BED	CHARSADDA	2016	GHSS BATTAGRAM	02-03-85	79.00	12-08-14	12-09-14	
64	15101-0134774-7	FAZLI RABI	FAZAL RAZIQ	MS CS , M.Ed	BUNER	2016	GHS DAGAI	20-03-88	79.00	12-09-14	12-09-14	
65	13101-5957063-9	FAISAL REHMAN	MIANDAD	BS(TELECOM & NET) MED	ABBOTTABAD	2016	GHS NO.1 HAVELIAN	19-11-88	79.00	12-09-14	12-09-14	
66	16201-0721748-1	HAMID BACHA	MIAN JAMEE UDDIN	BS(IT) Hons / BED	SWABI	2014	GHS LAHOR SWABI	02-02-83	78.00	12-09-14	12-09-14	
67	13302-4860203-5	MUHAMMAD ZAHEER BABAR	MUHAMMAD YOUSAF	BS COMP SC/BED	HARIPUR	2015	GHS CENTRAL JAIL HARIPUR	08-01-89	78.00	12-09-14	12-09-14	
68	17101-9647608-7	ADNAN KHAN	MUHAMMAD IBRAHIM	BSCS B.Ed	CHARSADDA	2016	GHS KATOZAI	01-03-88	77.00	12-09-14	12-09-14	
69	17301-2043251-5	YASIN SHAH	HUSSAIN SHAH	MSC/BED	PESHAWAR	2012	GSM DAUD HIGH SCHOOL MATHRA	06-02-81	76.00	08-12-14	08-12-14	
70	15307-4938316-9	MUHAMMAD ILYAS S/O SST(IT)	AMIR BAHADAR	MS(CS) B.ED M.ED	DIR LOWER	2011	ASDEU KITTARI CHAKDARA DIVISION	02-12-84	76.00	20-10-14	20-10-14	
71	12101-0854407-7	MUHAMMAD AMIR SHAH	GHULAM AKBAR SHAH	BS(SYSTEME ENGINEERING) B.ED	DERA ISMAIL KHAN	2017	GHS BILOT SHARIF DI KHAN	07-08-86	76.00	17-11-14	17-11-14	
72	15602-0252416-3	NAMAT ULLAH	SAEED ULLAH	BS TELECOMMU NICATION	KOHISTAN		GHS PATTAN KOHISTAN LOWER	18-04-88	74.00	17-11-14	17-11-14	
73	14101-0771854-9	QUDRAT REHMAN	GULABAT KHAN	BS I TECH. B.Ed,M.Ed	HANGU	2010	GCMHS NO.1 HANGU	01-11-82	88.00	16-12-16	16-12-16	
74	17201-6325734-9	MIAN KHURAM SHAHZAD	MIAN MUHAMMAD HUSSAIN	MS IT	NOWSHERA		GHS ALI BAIG NOWSHERA	09-11-83	87.20	16-12-16	16-12-16	
75	17101-0339835-5	RAFI ALAM	BAKHT BAZ	MSc(CS)	CHARSADDA		GHS BABRA	04-03-82	87.10	16-12-16	16-12-16	
76	15302-2470027-3	SHEHZAD AHMAD	SHAHAB UD DIN KHAN	M.Sc CS B.Ed	DIR LOWER	2013	GHS Shago Kass	15-04-88	85.70	16-12-16	16-12-16	
77	15402-8333492-5	FAZAL AMIN	USMAN GHANI	BS COMP SC/BED	MALAKAND	2015	GHS NO.1 ALLADHAND DHERI MALAKAND	01-02-81	85.30	16-12-16	16-12-16	

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ANNEXURE

"F"

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

FINAL SENIORITY LIST OF SST IT BPS-16 IN ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA AS STOOD ON 31/12/2021

S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declara tion	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Deptt	Date of Apptt as SST (IT)	Remarks
1	21201-8885744-9	Muhammad Ilyas	Ezat Khan	MCS, MS (Comp) B.Ed	KHYBER	2020	GHS Kohi Sher Haider Khyber	11/04/1981		14/06/2005	14/06/2005	Differed in previous DPC
2		Nisar Khan	Ismail Khan	M.Sc	KHYBER		GHS Pindi Lalma	20/11/1983		14/06/2005	14/06/2005	Differed in previous DPC
3	12201-1880433-7	Sami Ullah	Moin Khan	B.Sc B.Ed	SOUTH WAZIRISTAN	2015	GHS Spinkai	31/03/1983		14/06/2005	14/06/2005	Differed in previous DPC
4	16102-7937471-5	Sagheer Ahmad	Akram Khan	M.Sc CS, B.Ed	KHYBER	2020	GHS Shagai	04/03/1982		04/09/2006	04/09/2006	Differed in previous DPC
5	21303-0830595-9	Iqar Hussain	Munir Hussain	M.Sc (Comp) ,B.Ed	Kurram	2013	GHS Israr Shaheed Kurram	05/04/1985		14/10/2006	14/10/2006	Differed in previous DPC
6	11101-8235769-3	Abid Nawaz	Rahim Nawaz	B.Sc ,B.Ed	BANNU	2013	GHS Shahoor s/w	12/10/1986		09/02/2008	09/02/2008	Differed in previous DPC
7	21103-8831093-9	PARVEZ KHAN	SHARIF KHAN	B.SC ,B.Ed	BAJAUR	2017	GHS INAYAT KILLI BAJAUR	15/11/1981		09/02/2008	09/02/2008	Differed in previous DPC
8	21506-4367367-5	Bashir Ahmad	Muhammad Yasin	B.Sc	NORTH WAZIRISTAN		GHS Miranshah	03/01/1987		09/02/2008	09/02/2008	Differed in previous DPC
9		Fayaz Ahmad	Muhammad Yaqoob Khan	B.Sc	Mohmand		GHS Danish Kool	16/04/1989		09/02/2008	09/02/2008	Differed in previous DPC
10	15601-1417186-7	HALIMUR RASHID	MUHAMMAD AFSAR KHAN	MSCIT BED	SWAT	2012	GHSS SIJBAN	10/01/1978		26/06/2006	01/07/2009	Differed in previous DPC
11	16202-0898172-9	Sohail Irfan	Muhammad Ayub	BCS	Swabi		GHS Gandaf	24/08/1973		01/07/2007	01/07/2007	Differed in previous DPC
12	17102-0537988-3	Mehroz Khan	Shamroz Khan	M.SC Maths , M.Ed	Mohmand	2012	GHS Gulabad Tangi charsadda	14/03/1985		13/09/2011	13/09/2011	Differed in previous DPC
13	21303-5586985-9	Syed Rafiq Hussain	Syed Mushtaq Hussain	M.Sc (Comp) , B.Ed	Kurram	2015	GHS Zeran Kurram	01/04/1989		01/03/2012	01/03/2012	Differed in previous DPC
14	21303-8825621-9	Asad Ali	Sardar Hussain	M.Sc (Comp) , B.Ed	Kurram	2015	GHS Kirman	06/02/1989		27/03/2012	27/03/2012	Differed in previous DPC

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S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declar ation	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Deptt	Date of Apptt as SST (IT)	Remarks
15	11101-7304357-1	ANWARULLAH	HAR DIL KHAN	MSC (CS) B.ED	BANNU	2008	GOVT SHAHEED ABDUL AZAM AFRIDI HIGHER SECONDARY SCHOOL JAMRUD KHYBER	09/09/1985		14/01/2011	20/10/2014	PSC KPK
16	15307-4938316-9	MUHAMMAD ILYAS	AMIR BAHADAR	MS(CS) B.ED M.ED	DIR LOWER	2011	ASDEO KITYARI CHAKDARA DIVISION	02/12/1984		20/10/2014	20/10/2014	PSC KPK
17	22201-6290349-9	SYED UMER KHAN	S/O AMANULLAH	MCS B.ED	BANNU	2006	GHSS NADIR BODIN KHEL BANNU	01/05/1982		20/10/2014	20/10/2014	PSC KPK
18	12101-0938869-1	ATTA UR REHMAN	GUL MUHAMMAD	MCS M.ED	DI KHAN	2004	GHSS DARABAN KALAN	05/02/1983		17/05/2014	20/10/2014	PSC KPK
19	13503-2341883-3	ZAHEER AHMED	MUHAMMAD ARIF	MCS / BED	MANSEHRA	2012	GHS NO.2 MANSEHRA	18/01/1980		20/10/2014	23/12/2014	PSC KPK
20	21507-8619162-3	KHALIL UR REHMAN KHAN	QANDAHAR	MCS B.ED M.ED	NORTH WAZIRISTAN	2007	GHS RAZMAK CAMP NWTD	05/04/1984		19/11/2014	19/11/2014	PSC KPK
21	16102-8393729-3	Farman Ali	Habib Ur Rehman	MS CS B.ED	MARDAN	2011	Govt : Shaheed Muhammad Ali High School Toru	24/04/1986		20/10/2014	20/10/2014	PSC KPK
22	13101-5564010-5	IFTIKHAR AHMAD	S/O MUHAMMAD ASLAM	MSc(CS) MED	ABBOTTABAD	2011	GHS NO.3 ABBOTTABAD	02/03/1978		20/10/2014	20/10/2014	PSC KPK
23	17101-0269442-7	MIAN NAVEED ULLAH JAN	MIAN FAZLI GHANI	M.SC CS B.ED	CHARSADDA	2009	GHS Ibrahim Zai Charsadda	12/04/1983		20/10/2014	20/10/2014	PSC KPK
24	12201-4664615-9	MUHAMMAD JAMSHID	S/O MATI UD DIN	MCS B.ED M.ED	SOUTH WAZIRISTAN	2011	GHS SARAROGHA SOUTH WAZIRISTAN	12/04/1987		19/11/2014	19/11/2014	PSC KPK
25	21107-7986265-5	ZAHID ULLAH	GUL BADSHAH	MSC(CS) B.ED - M.ED	BAJAUR	2011	GHS GHAZI BABA	08/05/1988		20/10/2014	20/10/2014	PSC KPK
26	15602-0457599-9	NASR ULLAH KHAN	MOMIN KHAN	MSc(CS) MED	SWAT	2008	GHS Nawakaly Mingora Swat	04/04/1983		20/10/2014	20/10/2014	PSC KPK
27	13302-9319165-9	AMIR JAVED S/O	MUHAMMAD JAVED	MS COMP SC./MED	HARIPUR	2011	GHS KANGRA COLONY HARIPUR	09/09/1984		02/10/2012	20/10/2014	PSC KPK
28	11201-9926331-9	FARHAT ULLAH KHAN	ASMATULLAH	MSC CS B.ED	LAKKI MARWAT	2012	GHS AHMAED KHEL	15/05/1986		20/10/2014	20/10/2014	PSC KPK
29	21201-7280026-5	WAJID KHAN	AKRAM KHAN	MS/M.PHIL (CS) M.ED	KHYBER	2011	GHSS Spindand Bara Khyber	30/11/1987		11/07/2009	20/10/2014	PSC KPK

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S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declaration	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Deptt	Date of Appt as SST (IT)	Remarks
30	11101-1459694-7	ZAHIDULLAH KHAN	MUHAMMAD NOOR ALI KHAN	MSCS BED	BANNU	2002	GHSS COMPREHENSIVE BANNU	14/12/1977		16/04/2005	11/12/2015	
31	16102-1411686-5	MAJID ALI	SARFARAZ	MSCS BED	MARDAN	2013	GHS NASEER KILLI	15/03/1983	96.00	12/09/2014	12/09/2014	
32	11101-9104233-7	GUL NAWAR KHAN	RAZA KHAN	MSIT BED	BANNU	2014	GHS NO.1 BANNU CITY	15/02/1983	95.00	12/09/2014	12/09/2014	
33	15602-0490712-3	BAKHT AZAM	ALI AKBAR	MPHIL(CS) BED	SWAT	2013	GHS NO.1 MINGORA	20/04/1980	91.00	12/09/2014	12/09/2014	
34	12101-0897784-1	KIFAYATULLAH	INAYATULLAH	BSIT B.ED	DI Khan	2013	GCMHS NO.1 DI KHAN	05/02/1983	91.00	12/09/2014	12/09/2014	
35	11101-4109215-5	JAMSHED AHMAD	SYED GHULAM	MSCS BED	BANNU	2013	GHS AZIM KILLA	01/04/1986	90.00	12/09/2014	12/09/2014	
36	11101-7278905-7	MUHAMMAD MUNEEB	MUHAMMAD HAYAT KHAN	BCS(HON) BED	BANNU	2010	GHS NO.2 BANNU CITY	04/04/1987	90.00	12/09/2014	12/09/2014	
37	13503-4825758-7	MUHAMMAD JUNAID IQBAL	MUHAMMAD IQBAL	MSCS BED	MANSEHRA	2013	GCMS MANSEHRA	03/03/1985	89.00	12/09/2014	12/09/2014	
38	17103-0345196-9	MUHAMMAD IRFAN	MUHAMMAD JAVID KHAN	MS(TELECOM & NET) MED	CHARSADDA	2012	GSSDHS SHABQADAR	03/02/1988	88.00	12/09/2014	12/09/2014	
39	13504-4494618-9	SARFRAZ AHMAD	FAQIR MUHAMMAD	BCS HON/BED	MANSEHRA	2013	GHS Kolika	02/10/1983	87.00	30/07/2011	12/09/2014	
40	15505-5310232-7	FAYAZ ALI	MARAJ KHAN	MSCS BED	SHANGLA	2012	GHS DHERAI PURAN	20/05/1984	87.00	12/09/2014	12/09/2014	
41	15306-8701618-1	AMIN UR RAHMAN	TAJ MUHAMMAD	M.Phil (Comp-Sc) M.Ed B.Ed	DIR LOWER	2013	GGHS Rabat Lower Dir	08/03/1985	87.00	12/09/2014	12/09/2014	
42	13503-3539674-9	ZAKIR KHAN	MUHAMMAD YOUSAF	MS COMP SC / MED	MANSEHRA	2017	GHS SHAMDARA Oghi MANSEHRA	03/09/1987	87.00	12/09/2014	12/09/2014	
43	16101-1205103-7	ABDUL MANAN	GHULAM RAHIM	BSIT BED	MARDAN	2013	GHS BADAR BANDA	11/04/1981	86.00	12/09/2014	12/09/2014	
44	15401-7657332-5	WAQAS UL ISLAM	FARMAN ALI SHAH	BSIT BED	MALAKAND	2013	GSASHS NO.1 THANA MALAKAND	20/05/1989	86.00	12/09/2014	12/09/2014	
45	12201-1881795-7	MUHAMMAD SHAHID KAMAL	UMAR HAYAT	MCS MED	TANK	2009	GSSCMHS NO.1 TANK	11/04/1982	85.00	12/09/2014	12/09/2014	

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46	13503-1696127-1	UMAIR AWAN	WALI DAD	MS COMP SC/BED	MANSEHRA	2014	GHS BAJNA MANSEHRA	30/01/1986	85.00	12/09/2014	12/09/2014	
47	15307-8872268-7	QAISAR KHAN	NAWAB KHAN	BSCS MSTN B.Ed/M.Ed	DIR LOWER	2016	GHSS CHAKDARA	01/02/1986	85.00	17/11/2014	17/11/2014	
48	17201-9346841-1	IMRAN PERVEZ	PERVEZ AHMAD KHAN	MSC COMP SC,B.Ed/M.Ed	NOWSHERA	2014	GHSS NO.2 NOWSHERA CANTT	21/04/1986	85.00	12/09/2014	12/09/2014	
49	15702-5904046-1	KHUSH DIL	ASFANDYAR	MPIL(CS) BED	DIR UPPER	2012	GHS GHANDIGAR	01/05/1986	85.00	12/09/2014	12/09/2014	
50	15101-0788182-5	ASHFAQ UR RAHMAN	SHARIF UR RAHMAN	MSC COMP SC/BED	BUNER	2014	GHS KARAPA BUNER	01/04/1988	85.00	12/09/2014	12/09/2014	
51	17101-5704611-5	FAIZ ULLAH	GUL ZARIF	MSc(ELEC &ELECTRONICS ENG) BED	CHARSADDA	2013	GHS NO.1 RAJJAR	20/04/1988	85.00	12/09/2014	12/09/2014	
52	17301-2329206-7	NASEER MUHAMMAD	AHMAD GUL	MSC COMP SC/BED	PESHAWAR	2011	GHS GULSHAN REHMAN COLONY PESH	06/03/1989	85.00	12/09/2014	12/09/2014	
53	16101-6858369-1	NASEER KHAN	MISRI KHAN	MCS BED	MARDAN	2013	GCMHS NO.3	25/08/1980	84.00	12/09/2014	12/09/2014	
54	17301-1991193-1	ZEESHAN SOHAIL	MUKHTAR AHMED SOHAIL	MSC CS B.ED M.ED	PESHAWAR	2012	GHS LANDI ARBAB	03/02/1986	84.00	12/09/2014	12/09/2014	
55	13202-5026731-9	SAIF ULLAH	AMIR MUHAMMAD KHAN	BS(CS) B.ED M.ed	BATTAGRAM	2013	GHS DAGAL BATTAGRAM	11/04/1987	84.00	12/09/2014	12/09/2014	
56	16101-5831929-9	MUHAMMAD SIDDIQ	SARDAR MUHAMMAD	MCS BED	MARDAN	2011	GHS GUMBAT	12/04/1983	83.00	12/09/2014	12/09/2014	
57	16201-5314575-7	SAJID AMIN	IQRAR UD DIN	MCS COMP SC/BED	SWABI	2011	GHS LAHOR SHARQI SWABI	24/09/1985	83.00	12/09/2014	12/09/2014	
58	13503-6885530-5	MAJID KHAN	MUHAMMAD AJMAIL	MCS MED	MANSEHRA	2017	GHS SHOHAL MAZULLAH MANSEHRA	25/03/1989	82.00	17/11/2014	17/11/2014	
59	13503-5902512-7	MAJID KHAN	BEHRAM KHAN	BSc(CS) /BED	MANSEHRA	2011	GHS BAIDRA MANSEHRA	13/02/1983	81.00	17/11/2014	17/11/2014	
60	17201-8166639-7	FAROOQ AHMAD	GULNAR DIN	MBA BS COMP SC/BED	NOWSHERA	2016	GHS MISRI BANDA NOWSHERA	01/03/1983	81.00	12/09/2014	12/09/2014	
61	14202-2631801-1	NISAR AHMED	MOMEEN KHAN	MCS MED	KARAK	2011	GHS AHMAD BANDA KARAK	15/02/1985	81.00	17/11/2014	17/11/2014	

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62	16101-7024394-9	IRFAN AHMAD	ANWAR KHAN	MSCS BED	MARDAN	2016	GHS Rustam	22/07/1983	81.00	12/09/2014	12/09/2014	
63	14203-2052798-3	TAHIR SALEEM	AWAL MUHAMMAD	M.Sc IT MS Electronic Eng., B.Ed. M.Ed	KARAK	2015	GHS Takht Nasrati Karak	02/08/1983	80.00	17/11/2014	17/11/2014	
64	16202-8302001-9	MEHBOOB AHMAD	HAFIZ UR REHMAN	MSC COMP SC,B.Ed	SWABI	2015	GHS SHAHMANSOOR SWABI	05/12/1981	79.00	12/09/2014	12/09/2014	
65	17102-7975287-1	QAISAR SHAH	ZAMARUD SHAH	MSc(CS) BED	CHARSADDA	2016	GHSS BATTAGRAM	02/03/1985	79.00	12/09/2014	12/09/2014	
66	15101-0134774-7	FAZLI RABI	FAZAL RAZIQ	MS CS , M.Ed	BUNER	2016	GHS DAGAI	20/03/1988	79.00	12/09/2014	12/09/2014	
67	13101-5957063-9	FAISAL REHMAN	MIANDAD	BS(TELECOM & NET) MED	ABBOTTABAD	2016	GHS NO.1 HAVELIAN	19/11/1988	79.00	12/09/2014	12/09/2014	
68	16201-0721748-1	HAMID BACHA	MIAN JAMEE UDDIN	BS(IT) Hons / BED	SWABI	2014	GHS LAHOR SWABI	02/02/1983	78.00	12/09/2014	12/09/2014	
69	13302-4860203-5	MUHAMMAD ZAHEER BABAR	MUHAMMAD YOUSAF	BS COMP SC/BED	HARIPUR	2015	GHS CENTRAL JAIL HARIPUR	06/01/1939	78.00	12/09/2014	12/09/2014	
70	17101-9647608-7	ADNAN KHAN	MUHAMMAD IBRAHIM	BSCS B.Ed	CHARSADDA	2016	GHS KATOZAI	01/03/1988	77.00	16/02/2015	16/02/2015	
71	17301-2043251-5	YASIN SHAH	HUSSAIN SHAH	MSC/BED	PESHAWAR	2012	GSM DAUD HIGH SCHOOL MATHRA	06/02/1981	76.00	08/12/2014	08/12/2014	
72	12101-0854407-7	MUHAMMAD AMIR SHAH	GHULAM AKBAR SHAH	BS(SYSTEMENGIN EERING) B.ED	DERA ISMAIL KHAN	2017	GHS BILOT SHARIF DI KHAN	07/08/1986	76.00	17/11/2014	17/11/2014	
73	15602-0252416-3	NAMAT ULLAH	SAEED ULLAH	BS TELECOMMUNICAT ION	KOHISTAN		GHS PATTAN KOHISTAN LOWER	18/04/1988	74.00	17/11/2014	17/11/2014	
74	14101-0771854-9	QUDRAT REHMAN	GULABAT KHAN	BS I TECH. B.Ed,M.Ed	HANGU	2010	GCMHS NO.1 HANGU	01/11/1982	89.00	16/12/2016	16/12/2016	
75	17201-6325734-9	MIAN KHURAM SHAHZAD	MIAN MUHAMMAD HUSSAIN	MS IT	NOWSHERA		GHS ALI BAIG NOWSHERA	09/11/1983	87.20	16/12/2016	16/12/2016	
76	17101-0339835-5	RAFI ALAM	BAKHT BAZ	MSc(CS)	CHARSADDA		GHS BABRA	04/03/1982	87.10	16/12/2016	16/12/2016	

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ANNEXURE G

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The Director
Elementary and Secondary Education
Khyber Pakhtunkhwa

Subject: Appeal against wrong Seniority List of SST(IT) Male B-16
Sir

I was appointed as IT Teacher BPS-16 (Re-designated as SST-IT) on 12/09/2014 (Annex-I) and regularized under The Khyber Pakhtunkhwa Employees of the elementary and secondary education department (Appointment and Regularization of Services) (Amendment) Act, 2018 (Khyber Pakhtunkhwa Act No. II of 2019) (Annex-II). The department notified this regularization via Endst. No. 2435-43 File No. 02 IT Teachers Regularization Dated Peshawar the 08/03/2019 (Annex-III).

The department issued Final Seniority List of SST-IT BPS-16 via Endst. No. 8585-90 F.No. DDE/SST(IT) (Teaching Cadre) BS-16 (M) Seniority/2022 Dated Pesh the 24/01/2022 (Annex-IV). I was placed on seniority No. 68 while my actual position after correction is 37. This seniority is awarded on aggregate marks criteria used at the time of appointment. Whereas the criteria for determination of seniority inter-se The Khyber Pakhtunkhwa Employees of the elementary and secondary education department (Appointment and Regularization of Services) (Amendment) Act, 2018 (Khyber Pakhtunkhwa Act No. II of 2019) has been provided in sub-section 2 of section-4 of the said act, which is reproduced as below.

"(2) The seniority inter-se of those employees whose services are regularized under this Act within the cadre shall be determined on the basis of their continuous service in the cadre; provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one."

Few days before on social media I saw a judgment of the Service Tribunal Khyber Pakhtunkhwa (Annex-V) regarding seniority of the employees regularized under the above mentioned Act, which states that the seniority within the same cadre with same continuous service shall be determined on the basis of age.

Therefore, I request you accept this appeal and correct my seniority according to the Act. And as I am promoted to the post of Subject Specialist-IT BPS-17, the corrected seniority must be reflected in my promotion Order and Seniority in present grade too.

I shall be much thankful for your kind and timely action in this regard.

Enclosure: Annex-I, II, III, IV and V

Sincerely Your
Hamid Bacha
SS- IT
GHSS Kalukhwa
Dated: 18/09/2023

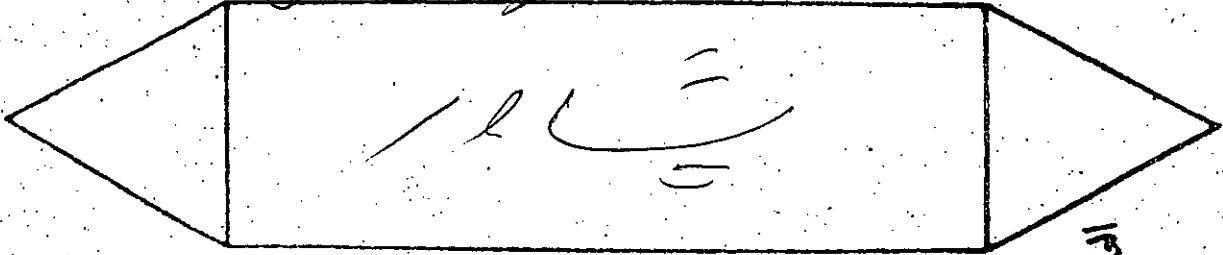
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بعدالت عیناں سرکاری ٹریڈنگ



صاحبزادہ باجیا سید سید عابد

(35)

بنام
راجھو کھانا

لاؤ

مقدمہ

دعویٰ

جرم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی دیکل
 کارروائی متعلقہ آن مقام کے لئے
 مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو کرنے راہی نامہ و تقررات و فیصلہ برحلف دیے جواب وہی اور اقبال دعویٰ اور
 بصورت دگری کرنے اجراء اور دعویٰ چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
 ذرا میں پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا دگری یکطرفہ یا اسل کی برآمدگی اور منافی
 نیز دائر کرنے اسل ٹکرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی مجلے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جلد مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
 پرداخت منظور و قبول ہوگا۔ و دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سب سے ہوگا۔
 اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا خرچہ کی ذمہ داری قبول کرنے کا بھی اختیار ہوگا۔ اگر
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا نکات نامہ لکھ دیا کہ مستند رہے۔

المترجم

B.C. 10-7560

Accepted

T. Noor
 Khan
 ASC
 H.M.
 (NK)

بیتنام
 کامہ با