


Form- A

FORM OF ORDER SHEET

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

Case No.- 972/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/07/2024	<p>In compliance with the direction issued by the Honourable Tribunal as per the order sheet dated 24.06.2024 in joint service appeal no. 752/2024, the instant appeal is submitted by the learned counsel in the prescribed format in accordance with the Khyber Pakhtunkhwa Serviced Tribunal Act/Rules 1974. In light of the aforementioned order, the present appeal should also be clubbed with appeal no. 752/2024, which is already fixed for preliminary hearing before the Single Bench at Peshawar on 31.07.2024.</p> <p style="text-align: right;"> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR.**

In Re:

Service Appeal No:- 972

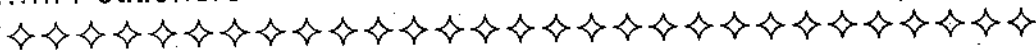
Abdul Rasheed

**Versus**

Chief Secretary Govt: of  
KP & others

..... Petitioners

..... Respondents



The appellant had earlier filed a Writ Petition No 3471-P/2023 before the august Peshawar High Court, Peshawar, wherein the Honourable High Court was pleased to transmit the same to this learned Tribunal by treating the writ petition as Service Appeal and directing this learned Tribunal to decide the same in accordance with law and the appellant was directed to appear before this Honourable Tribunal on 24/06/2024. The appellant appeared before this Honourable Tribunal on 24/06/2024, wherein this Honourable Tribunal was pleased to order the appellant to present the Writ Petition in the format of Service appeal, hence the title Service Appeal.

  
Advocate

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 972 /2024

Abdur Rasheed Khan Versus Chief Secty, Govt of KP & Others

INDEX

S. No	Description of document	Dated	Annex	Pg No
1.	Service Appeal and Affidavit			1-3
2.	Copy of Notification	05-12-17	A	4-8
3.	Copy of Service Rules	24-11-17	B	5-13
4.	Copy of Seniority list & certificates		C	14-25
5.	Copy of Departmental Appeal		D	26
6.	Copy of letter	10-02-23	E	27-29
7.	Copy of Notification	11-04-23	F	30
8.	Copy of Writ Petition		G	31-33
9.	Copy of Comments		H	34-36
10.	Copy of Judgment		I	37-38
11	in A.C. 11			39

Dated: / /2024

*Abdur Rasheed*  
Appellant,

Through

Muhammad Ayub Khan Shinwari

LL.B; LL.M

ADVOCATE  
Supreme Court of Pakistan

CHAMBER

7-A, Haroon Mansion,

Khyber Bazar, Peshawar

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

Service Appeal No 972 /2024

Abdur Rasheed Khan, Senior Instructor (Retd),  
GTVC (B), D.I Khan

.....Appellant

Versus

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
6. Managing Director, KP, TEVTA

.....Respondents

**Service Appeal under Section 4 of the Khyber Pakhtunkhwa  
Service Tribunal Act, 1974**

**Respectfully Sheweth,**

Brief but relevant facts of the case are:

1. That the Appellant was initially appointed as Instructors (BPS-14) in the respondent Department. Later on, the Appellant was promoted to the post of Senior Instructor (BPS-17) vide Notification dated 05-12-2017. (Copy of Notification is filed herewith and annexed as **Annex-A**)
2. That as per service rules of the respondent department framed vide Notification dated 24-11-2017, the post of Principal/Vice Principal (BPS-18) is to be filled by promotion, on the basis of seniority cum fitness from amongst the Chief Instructors, Training Managers, Vice Principals, Senior Instructors, Trainers and Staff Trainers (BPS-17) having Management training Course of not less than cumulative period of three months and Instructor Training Course of not less than six months from a recognized Institute with five years service as such. (Copy of Service Rules is filed herewith and annexed as **Annex-B**)
3. That in the respondent Department 38 posts of Principals/Vice Principals (BPS-18) are lying vacant. The Appellant is at Serial No **26** of the Final Seniority list of Chief Instructor/Training Manager/Senior Instructor/Trainer/Staff Trainer (BPS-17) circulated vide Notification dated 13-06-2022. The Appellant have served for more than five years as Senior Instructor (BPS-17) in the respondent Department and a part from this the Appellant have completed the requisite courses, thus the Appellant is fit and

eligible to be promoted to the post of Principal/Vice Principal (BPS-18). (Copy of Seniority list and Certificates of requisite Courses are filed herewith & annexed as **Annex-C**)

4. That the Appellant approached the respondents for considering him for promotion to the post of Principal/Vice Principal (BPS-18) by filling applications. (Copy of application is filed herewith and annexed as **Annex-D**)
5. That the aforesaid applications of the Appellant along with one Mr Muhammad Hassan, Senior Instructor were sent to the competent authority for placing their cases before the PSB vide letter dated 10-02-2023. The said Mr Muhammad Hassan, Senior Instructor has been promoted to BPS-18 which is evident from the Notification dated 17<sup>th</sup> November, 2022, whereas the Appellant has been deprived from promotion. The Appellant has retired from government service vide Notification dated 11-04-2023 on attaining the age of superannuation. (Copy of letter and Notification is filed herewith and annexed as **Annex-E & F**)
6. That the Appellant feeling aggrieved of the inaction of the respondents, filed Writ Petition No 3474, title Muhammad Usman & others Versus Chief Secretary, Govt of KP & others wherein the comments were filed by the respondents and after hearing the Honorable Court was pleased to treat the same as Service Appeal and transmit the same to this Honorable Tribunal vide Judgment dated 30-05-2024. (Copy of Writ Petition, Comments and Judgment is filed herewith and annexed as **Annex-G to I**)

Hence this Service Appeal on the following amongst other grounds:

**Grounds:**

- a. That the treatment met out to the Appellant is against the law, illegal, unlawful and without lawful authority, thus calling interference of this Honorable Court in its constitutional jurisdiction.
- b. That as per service rules of the respondent department, the Appellant is fit and eligible to be promoted to the post of Principal/Vice Principal (BPS-18).
- c. That before superannuation, the Appellant as per relevant service rules was fit and eligible for promotion, thus was due for his promotion but has been made to suffer merely on account of departmental lapse of not holding PSB meeting before his superannuation. The Appellant has been deprived of his vested right of consideration for promotion due to act of respondents which has caused him permanent loss of pensionary benefits of higher grade despite the fact that the Appellant was pursuing his promotion case diligently and has filed written representation well within time before his superannuation.
- d. That the Appellant is a civil servants and the posts of Principal/Vice Principal (BPS-18) are lying vacant, the Appellant has been denied promotion before superannuation without any fault on his part.

- e. That the treatment met to the Appellant is against the fundamental rights enshrined and protected under the Constitution of Islamic Republic of Pakistan, 1973.
- f. That the treatment met out to the Appellant is against the principles of natural justice and settled principles of administrative law.
- g. That the Appellant crave permission of this Honorable Court to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.

It is, therefore, prayed that on acceptance of this service appeal the respondents may kindly be directed to pursue the letter dated 10-02-2023, convene the meeting of Provincial Selection Board, prepare the promotion papers of the Appellant and place the same before the next Promotion Selection Board meeting for consideration of the Appellant's proforma promotion to the post of Principal/Vice Principal (BPS-18) with all back benefits.

Grant any additional, further, better and or alternative relief that this Honorable Court may deem fit to grant in the circumstances of this case.

Appellant,  
Through **Muhammad Ayub Khan Shinwari**  
Advocate Supreme Court

**Affidavit**

I, Abdur Rasheed Khan, Senior Instructor (Retd), GTVC (B), D.I Khan, do hereby solemnly affirm and state 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 Honorable Court.

Deponent



Government of Khyber Pakhtunkhwa  
Industries, Commerce & Technical Education  
Department

**NOTIFICATION**

**No.SOIII(IND)I-17/2017.** The Competent Authority in the Industries, Commerce & Technical Education Department Khyber Pakhtunkhwa upon recommendations of the Departmental Promotion Committee is pleased to promote the following Junior Instructors (BPS-15) to the posts of Chief Instructor/Training Manager/Vice Principal/Senior Instructor/Trainer and Staff Trainers (BPS-17) in the Khyber Pakhtunkhwa Technical Education & Vocational Training Authority (KP-TEVTA) on regular basis, with immediate effect:-

S.No.	Name of the Junior Instructors	S.No.	Name of the Junior Instructors
1.	Mr.Jamshid Anwar,	29.	Rooh Ullah,
2.	Younas Zeb,	30.	Zulfiqar Ali,
3.	Mr.Sher Ali Khan,	31.	Jehan Zeb Khan,
4.	Muhammad Usman,	32.	Manzoor Hayat,
5.	Mr.Liaqat Ali,	33.	Shujat Ali,
6.	Muhammad Zeb,	34.	Ajmal Khan,
7.	Ghulam Satar,	35.	Saleem Ahmad,
8.	Noor Ul Akbar,	36.	Rahim Ur Rehman,
9.	Syed Imam Hussain,	37.	Murid Hussain,
10.	Muhammad Samar,	38.	Zahoor Ud Din,
11.	Aziz Ullah,	39.	Shafiqat Ullah,
12.	Islam Ud Din,	40.	Suleman Shah,
13.	Abdul Rashid,	41.	Muhammad Ajmal,
14.	Shabir Hussain,	42.	Izhar Ul Haq,
15.	Ali Muhammad,	43.	Muhammad Jamil,
16.	Ijaz Ahmad,	44.	Nawaz Ali,
17.	Faiz Ur Rahman,	45.	Fazal Rehman,
18.	Habib Ur Rehman,	46.	Asif Daud,
19.	Muhammad Shah,	47.	Muhammad Ibrahim,
20.	Israr Ahmad,	48.	Sher Ali Baz Khan,
21.	Rahmat Karim,	49.	Muhammad Ayaz Khan,
22.	Daulat Khan,	50.	Hayat Khan,
23.	Najeeb Ullah Khan,	51.	Qamar Ali,
24.	Tariq Jan,	52.	Dil Jan Khan,
25.	Muhammad Jamil,	53.	Zafar Iqbal,
26.	Burhan Ud Din,	54.	Shoukat Ali,
27.	Syed Yousaf Ali Shah,	55.	Hamayoun Khan,
28.	Adeel Azam,		

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2. The officers, shall remain on probation for a period of one year extendable for another year in terms of Section-6 (2) of Khyber Pakhtunkhwa, Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa, Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.

3. Consequent upon their promotion, the following transfer/posting of officers are hereby ordered:-

S.No	Name and Present posting	Posted/adjusted at
1.	Jamshid Anwar, Govt; Technical & Vocational Centre (B), Swat.	Govt; College of Technology, Timergara against the vacant post of Lecturer BS-17.
2.	Younas Zeb, Govt; Technical & Vocational Training Centre, Gulbahar Peshawar.	Govt; College of Technology, Timergara against the vacant post of Lecturer BPS-17.
3.	Mr.Sher Ali Khan, Govt; Technical & Vocational Centre (B), Matta Swat.	Govt; Technical & Vocational Centre (B), Matta Swat against the vacant post of Senior Instructor BPS-17
4. ✓	Muhammad Usman, Govt; Technical & Vocational Centre (B), Matta Swat.	Govt; College of Technology, Nowshera against the vacant post of Lecturer BPS-17
5.	Mr.Liaqat Ali, Govt; Technical & Vocational Centre (B), Charsadda	Govt; Technical & Vocational Centre (B), Charsadda against the vacant post of Senior Instructor BPS-17.
6.	Muhammad Zeb, Govt; Technical & Vocational Training Centre (B), Takhtbai	Govt; Technical & Vocational Centre (B), Samarbagh, Lower Dir against the vacant post of Senior Instructor BPS-17.
7.	Ghulam Satar, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar.	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17
8.	Noor Ul Akbar, Govt; Technical & Vocational Centre (B), Nowshera.	Govt; College of Technology, Nowshera against the vacant post of Lecturer BPS-17.
9.	Syed Imam Hussain, Govt; Technical Institute, Ekka Ghundi	Govt; Technical Institute Yakka Ghundi, Mohmand Agency against the vacant post of Lecturer BPS-17
10.	Muhammad Samar, Govt; Technical & Vocational Centre (B), Takhtbai.	Govt; Technical Institute, Kalaya, Orakzai Agency, against the vacant post of Lecturer BPS-17.
11.	Aziz Ullah, Govt; Technical & Vocational Centre (B), Takhtbai	Govt; Technical & Vocational Centre (B), Palaodheri Mardan against the vacant post of Lecturer BPS-17.
12.	Islam Ud Din, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical & Vocational Centre (B), D.I.Khan against the vacant post of Senior Instructor BPS-17.
13.	Abdul Rashid, Govt; Technical & Vocational Centre (B), Tank.	Govt; Technical & Vocational Centre (B), Tank against the vacant post of Lecturer BPS-17.
14.	Shabir Hussain, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar.	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.

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15.	Ali Muhammad, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical Institute Sadda, Kurram Agency against the vacant post of Lecturer BPS-17.
16.	Ijaz Ahmad, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; College of Technology, Timergara Lower Dir against the vacant post of Lecturer BPS-17.
17.	Faiz Ullah Rahman, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar.	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
18.	Habib Ur Rehman, Govt; Technical & Vocational Centre (B), Swabi.	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
19.	Muhammad Shah, Govt; Technical Institute, Bajour Agency.	Govt; Technical Institute, Ekka Ghund Mohmand Agency against the vacant post of Lecturer BS-17.
20.	Israr Ahmad, Govt; Technical & Vocational Centre (B), Takhtilahi	Govt; Technical & Vocational Centre (B), Samarbagh Dir against the vacant post of Lecturer BS-17
21.	Rahmat Karim, Govt; Technical & Vocational Centre (B), Chitral.	Govt; Technical Institute, Kalaya, Orakzai Agency against the vacant post of Lecturer BPS-17.
22.	Daulat Khan, Govt; Technical & Vocational Centre (B), Jehangira	Govt; Technical & Vocational Training Centre (B) Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
23.	Najeeb Ullah Khan, Govt; Technical & Vocational Centre (B), Swat	Govt; College of Technology, Timergara, Dir Lower against the vacant post of Lecturer BPS-17.
24.	Tariq Jan., Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical & Vocational Centre (B) D.I.Khan against the vacant post of Senior Instructor BPS-17.
25.	Muhammad Jamal, Govt; Technical & Vocational Centre (B) Gulbahar Peshawar	Govt; Technical Institute, Sadda Kurram Agency against the vacant post of Lecturer BPS-17.
26.	Burhan Ud Din, Govt; Technical & Vocational Centre (B), Jehangira	Govt; Technical & Vocational Centre (B) Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
27.	Syed Yousaf Ali Shah, Govt; Technical & Vocational Centre (B) Gulbahar Peshawar	Govt; College of Technology Kohat against the vacant post of Lecturer BPS-17.
28.	Adeel Azam, Govt; Technical & Vocational Centre (B) Gulbahar Peshawar	Govt; Technical & Vocational Centre (B) Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
29.	Rooh Ullah, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical & Vocational Centre (B) Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
30.	Zulfiqar Ali, Govt; Technical & Vocational Centre (B), Mansehra	Govt; Technical & Vocational Centre (B), Kohat against the vacant post of Senior Instructor BPS-17.

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31.	Jehan Zeb Khan, Govt; Technical & Vocational Centre (B) Gulbahar Peshawar	Govt; College of Technology, Nowshera against the vacant post of Lecturer BPS-17.
32.	Manzoor Hayat, Govt; Technical & Vocational Centre (B), Jehanpura	Govt; Technical & Vocational Centre (B), Samarbagh Dir against the vacant post of Lecturer BS-17.
33.	Shujat Ali, Govt; Technical & Vocational Centre (B), Karak.	Govt; Technical & Vocational Centre (B), Kohat against the vacant post of Senior Instructor BPS-17
34.	Ajmal Khan, Govt; Technical & Vocational Centre (B), Kalabat	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
35.	Saleem Ahmad, Govt; Polytechnic Institute, Haripur.	Govt; College of Technology, Bannu against the vacant post of Lecturer BPS-17.
36.	Rahim Ur Rehman, Govt; Technical & Vocational Centre (B), Swat.	Govt; Technical & Vocational Centre (B), Mingora Swat against the vacant post of Senior Instructor BPS-17.
37.	Murid Hussain, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical & Vocational Centre (B), Paharpur D.I.Khan against the vacant post of Senior Instructor BPS-17.
38.	Zahoor Ud Din, Govt; Technical & Vocational Centre (B), Ghazni Khel.	Govt; Technical & Vocational Centre (B), Ghazni Khel Lakki against the vacant post of Training Manager BPS-17.
39.	Shafiqat Ullah, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar.	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
40.	Suleman Shah, Govt; Technical & Vocational Centre (B), Manshara	Govt; Technical & Vocational Centre (B), Charsadda against the vacant post of Senior Instructor BPS-17.
41.	Muhammad Ajmal, Govt; Technical & Vocational Centre (B), Manshara	Skill Development Centre Balakot against the vacant post of Lecturer BPS-17.
42.	Izhar Ul Haq, Govt; Technical & Vocational Centre (B), Peshawar.	Govt; College of Technology, Bannu against the vacant post of Lecturer BPS-17.
43.	Muhammad Jami., Govt; Technical & Vocational Centre (B), Kalabat	Govt; Technical & Vocational Centre (B), Paharpur D.I.Khan against the vacant post of Lecturer BPS-17.
44.	Nawaz Ali, Govt; Technical & Vocational Centre (B), Swat.	Skill Development Centre Battagram against the vacant post of Senior Instructor BPS-17.
45.	Fazal Rehman, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.

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46.	Asif Daud, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar	Govt; College of Technology, Bannu against the vacant post of Lecturer BPS-17.
47.	Muhammad Ibrahim, Govt; Technical & Vocational Centre (B), Karak.	Govt; Technical & Vocational Centre (B), Hangu against the vacant post of Chief Instructor BPS-17.
48.	Sher Ali Baz Khan, Govt; Technical & Vocational Centre (B), Bannu	Govt; College of Technology, Bannu against the vacant post of Lecturer BPS-17.
49.	Muhammad Ayaz Khan, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17
50.	Hayat Khan, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical & Vocational Centre (B), D.I.Khan against the vacant post of Senior Instructor BPS-17.
51.	Qamar Ali, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar	Govt; Technical & Vocational Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.
52.	Dil Jan Khan, Govt; Technical & Vocational Centre (B), D.I.Khan	Govt; Technical Institute, Sadda Kurram Agency against the vacant post of Lecturer BPS-17.
53.	Zafar Iqbal, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar	Govt; College of Technology, Kohat against the vacant post of Lecturer BPS-17.
54.	Shoukat Ali, Govt; Technical & Vocational Centre (B), Bannu.	Govt; College of Technology, Bannu against the vacant post of Lecturer BPS-17.
55.	Hamayoun Khan, Govt; Technical & Vocational Centre (B), Gulbahar Peshawar.	Govt; Technical & Vocational Training Centre (B), Gulbahar Peshawar against the vacant post of Senior Instructor BPS-17.

-Sd-

Secretary to Govt. of Khyber Pakhtunkhwa,  
Industries, Commerce & Technical Education  
Department.

Endst:No.SOIII(IND)1-17/2017

Dated Pesh, the 5<sup>th</sup> December, 2017

Copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Managing Director KP-TEVTA University Town, Peshawar.
3. PSO to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officers, Timergara, Swat, Nowshera, Charsadda, Dir, Mardan, D.I.Khan, Tank, Kohat, Bannu, Lakki Marwat, Mansehra and Hangu.
5. Agency Accounts Officers, Mohmand Agency, Orakzay Agency and Kurram Agency.
6. Officers concerned. ✓

(HAMEED UR REHMAN)

SECTION OFFICER-III 5/12/17

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EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. PIII  
GAZETTE

~~Annex B~~

# KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 24<sup>TH</sup> NOVEMBER, 2017.

Government of Khyber Pakhtunkhwa  
Industries, Commerce & Technical Education Department

## NOTIFICATION

Dated: 22<sup>nd</sup> April, 2015.

No. SOIII(IND)4-13/2015/5839-51. — In pursuance of the provision contained in the sub-rule (2) of the rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer Rules, 1989 and supersession of all notifications issued in this behalf, the Industries, Commerce & Technical Education Department, in consultation with Establishment Department and the Finance Department, hereby lays down the method of the recruitment, qualification and other conditions specified in column No.3 to 5 of the Appendix to this notification which shall be applicable to the posts belonging to the Instructional cadre staff of Govt; Advance Technical Training Center, Govt; Technical & Vocational Training Centers and Skill Development Centers (Male & Female) specified in column No.2 of the said Appendix.

Secretary to Govt. of Khyber Pakhtunkhwa,  
Industries, Commerce & Technical Education  
Department.

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Printed and published by the Manager,  
Sarty. Ptg. Dept., Khyber Pakhtunkhwa, Peshawar.

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Annex B 9

## APPENDIX

S.No	Nomenclature of the post	Minimum required qualification for initial appointment	Age limit	Method of recruitment
1	2	3	4	5
1.	Principal (BPS-19)	---	---	By promotion, on the basis of seniority cum fitness, from amongst the Principals and Vice Principals (BPS-18) having Management Training Course of not less than cumulative period of three months and Instructor Training Course from a recognized Institute with seven years service as such:  Note: Those who attain the age of 58 years shall stand exempted from the mandatory training.
2.	Principal / Vice Principal (BPS-18)	---	---	By promotion, on the basis of seniority cum fitness, from amongst the Chief Instructors, Training Managers, Vice Principals, Senior Instructors, Trainers and Staff Trainers, (BPS-17) having Management Training Course of not less than cumulative period of three months and Instructor Training Course of not less than six months from a recognized Institute with five years service as such:
03	Chief Instructor/ Training Manager/ Vice Principal/ Senior Instructor/ Trainer/Staff Trainer (BPS-17)	i. Diploma of Associate Engineering in the relevant trade from a recognized institute with three years experience in the relevant field; or  ii. G-I Level training course in the relevant trade from a recognized Institute with five years experience in the relevant field.	21-30 years	a). Eighty percent by promotion, on the basis of seniority cum fitness, from amongst the Instructors(BPS-14)having six months Instructor Training Course from a recognized Institute with seven years service as such.  Note: Those who attain the age of 58 years shall stand exempted from the mandatory training; and  b). Twenty percent by initial recruitment.

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Instructor (BPS-14)

- i) Secondary School certificate from a recognized Board with Diploma of Associate Engineering in the relevant trade; technology from a recognized Institute; or
- ii) Secondary School certificate from a recognized Board with G-I Level Certificate in the relevant trade from a recognized institute; or
- iii) Secondary School Certificate from a recognized Board with three year apprenticeship Training certificate from registered industrial unit in the relevant trade; or
- iv) Secondary School Certificate from a recognized board with G-II Level training Course in the relevant trade from a recognized institute having professional experience in the relevant trade

21-28 years

a). Ten percent by promotion, on the basis of seniority cum fitness, from amongst the Trade Instructors and Assistant Managers (BPS-11) with seven years service as such, having six months Instructor Training Course from a recognized institute;

Provided that if no suitable person is available for promotion, then by initial recruitment; and

b). Ninety percent by initial recruitment.

NOTE: G-III or Trade Proficiency Certificate from a recognized institute having seven years professional or field experience after obtaining Certificate shall be eligible for initial recruitments as instructors (BPS-14) in those trades in which G-II level Training Courses are not available.

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Trade Instructor/ Assistant Manger (BPS-11)	<p>i. Secondary School certificate from a recognized Board with G-I Level course and apprenticeship training course in the relevant trade from a recognized institute; or</p> <p>ii. Secondary School Certificate from a recognized Board with G-II level training course from a recognized institute having three years experience in the relevant trade.</p>	21-28 years.	<p>a). Twenty percent by promotion, on the basis seniority cum fitness, from amongst the Jr. Trade Instructors (BPS-10) Draftsman( BPS- with seven years service as such, having months Instructor Training Course from recognized institute:</p> <p>Provided that if no suitable person is available promotion, then by initial recruitment; and</p> <p>b). Eighty percent by initial recruitment.</p>
Jr. Trade Instructor (BPS-10)	<p>i. G-II level course in the relevant trade from a recognized institute/ Board; or</p> <p>iii. Secondary School Certificate from a recognized Board with G-III Level Training Course from a recognized Institute or Trade Proficiency Certificate with seven years experience.</p>	21-28 years	<p>a). Twenty percent by promotion, on the basis seniority cum fitness, from amongst the Shc Assistants(BPS-06) having Six months Instruct Training Course and Trade Proficiency Certificate from a recognized institute with five year service experience as such; and</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment and</p> <p>b).Eighty percent by initial recruitment.</p>
Draftsman (BPS-10)	<p>ii. G-II level course in the relevant trade from a recognized institute/ Board; or</p> <p>iv. Secondary School Certificate from a recognized Board with G-III Level Training Course or Trade Proficiency Certificate from a recognized Institute with seven years experience in the relevant Trade.</p>	21-28 years	<p>a). Twenty percent by promotion, on the basis o seniority cum fitness, from amongst the Shop Assistants(BPS-06) having Six months Instructor Training Course and Trade Proficiency Certificate from a recognized institute with five years' service experience as such; and</p> <p>Provided that if no suitable person is available for promotion then by initial recruitment and</p> <p>b).Eighty percent by initial recruitment.</p>

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KHYBER PAKHTUNKHWA GOVT: GAZETTE, EXTRAORDINARY, 24<sup>TH</sup> NOVEMBER, 2017 684

<p>Shop Assistant (BPS-06)</p>	<p>i. Secondary School Certificate from a recognized Board with G-III Level Course from a recognized Institute or  ii. Secondary School Certificate from a recognized Board with Trade Proficiency Certificate from a recognized Institute.</p>	<p>21-28 years</p>	<p>a). Twenty percent by promotion, on the basis of seniority cum fitness, from amongst the Attendants Having Secondary School Cert from a recognized Board with five years' s as such and Trade Proficiency Certificate ( recognized Institute.  Provided that if no suitable person is available for promotion then by initial recruitment and  b). Eighty percent by initial recruitment.</p>
<p>Shop Attendant (BPS-1)</p>	<p>Secondary School Certificate from a recognized Board</p>	<p>21-28 years</p>	<p>By initial recruitment.</p>

Handwritten marks and numbers on the right margin, including a signature and the number '13'.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE, & TECHNICAL EDUCATION  
DEPARTMENT

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Annex - C 14

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE & TECHNICAL EDUCATION  
DEPARTMENT

No. SOIII(IND)4-7/2021/  
13<sup>th</sup> June, 2022

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To,

The Managing Director,  
KP-TEVTA, University Town Peshawar

Subject: FINAL SENIORITY LIST OF CHIEF INSTRUCTOR / TRAINING  
MANAGER / VICE PRINCIPAL / SENIOR INSTRUCTOR / TRAINER /  
STAFF TRAINER (BS-17) IN THE KHYBER PAKHTUNKHWA  
TECHNICAL EDUCATION AND VOCATIONAL TRAINING  
AUTHORITY AS STOOD ON 18.05.2022.

I am directed to refer to your letter No. KP-TEVTA/ESTT/S.List/Senr.  
Instructor /BS-17/2965 dated 20.05.2022 on the subject noted above and to forward  
herewith final seniority list of Chief Instructor / Training Manager / Vice Principal /  
Senior Instructor / Trainer / Staff Trainer BS-17 as stood on 18.05.2022 in the Khyber  
Pakhtunkhwa TEVTA. (In original) duly approved by the Competent Authority for  
further necessary at your end please.

Encl: as above

  
13-06-2022  
(SULAIMAN AHMAD)  
Section Officer-III

Endstt: No. & Date even.

Copy for information for to the:-

1. PS to Secretary, IC&TE Department.
2. PA to Deputy Secretary-II, IC&TE Department.

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Section Officer-III



GOVERNMENT OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE AND TECHNICAL EDUCATION DEPARTMENT

NOTIFICATION

NO. SO-III (IND)4-7/15/SL-17

In pursuance of section 8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with rule 17 of Khyber Pakhtunkhwa Civil Servants (appointment, Promotion and Transfer) Rules, 1989, the competent authority has been pleased to order issuance of Final Seniority list of Chief Instructor/Training Manager/Vice Principal/Senior Instructor/Trainer/Staff Trainer (BPS-17) who had not opted to become TEVTA employees on creation of TEVTA is hereby notified /circulated for general information.

FINAL SENIORITY LIST OF CHIEF INSTRUCTOR/TRAINING MANAGER/VICE PRINCIPAL/SENIOR INSTRUCTOR/TRAINER/STAFF TRAINER, (BPS-17) IN THE KHYBER PAKHTUNKHWA TECHNICAL EDUCATION AND VOCATIONAL TRAINING AUTHORITY, AS STOOD ON 18-05-2022.

Sr. No	Name of incumbent with academic qualification	Date of birth with domicile	Date of Entry 1 <sup>st</sup> Entry into Govt. Service	Present Post			Posting at	Remarks.
				Date	BPS	Method of recruitment		
1	2	3	4	6	7	8	9	10
1.	Mr. Zahid Ullah (RAC), i. 18 Months TPC ii. 03 months Management training	02-02-1965 Bannu	06-02-1991	30-04-2008	17	By Up Gradation	GTVC(B) Bannu	
2.	Mr. Iqbal Hussain (Carpenter), i. 02 years TPC ii. 06 Months Inst: Trg: Course iii. 03 months Management training	16-03-1964 Peshawar	12-02-1983	30-04-2008	17	Up Gradation	GTVC(B) Peshawar	
3.	Mr. Zaffar Akhtar, i. FA ii. G-III (Auto), iii. 06 Months Inst: Trg: Course iv. 03 months Management training	05-06-1967 Mardan	10-08-1984	30-04-2008	17	Up Gradation	GTVC(B), Mardan	
4.	Mr. Sahzad Jamil (Plumber), i. 18 Months TPC ii. G-II level Cert: iii. 01 Year Inst: Trg: Course iv. 03 months Management training	12-03-1965 Peshawar	25-08-1984	30-04-2008	17	Up Gradation	GTVC(B) Peshawar	

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5.	Mr. Noor Ul Amin (Auto), i. BA ii. DAE (Civil), iii. 06 Months Inst: Trg: Course iv. 03 months Management training	02-12-1964 Mardan	18-04-1987	30-04-2008	17	Up Gradation	GTVC(B) Takhl Bhai	
6.	Mr. Ashfaq Saleem (Auto), i. FA ii. DAE (Auto), iii. 06 Months Inst: Trg: Course iv. 03 months Management training	29-03-1964 Mansehra	28-04-1987	30-04-2008	17	Up Gradation	SDC Balakot	
7.	Mohammad Hasson (Welding), i. MA ii. DAE (Mechanical) iii. 06 Months ITC iv. 01 year Inst: Trg: Course. v. 03 months Management training	03-10-1962 Bannu	27-06-1987	30-04-2008	17	Up Gradation	GATC, H/Abad Peshawar	
8.	Mr. Noor Gul (RTV), i. DAE (Electronics) ii. 06 Months Inst: Trg: Course iii. 03 months Management training	15-05-1964 Peshawar	17-02-1991	30-04-2008	17	Up Gradation	GTVC(B) Peshawar	
9.	Mr. Iqbal Khan (Computer), i. Master of Computer Science. ii. 01-year diploma in IT iii. 01 Year TPC in Electronics iv. 06 Months Inst: Trg: Course v. 03 months Management training	07-05-1966 Peshawar	23-01-1992	30-04-2008	17	Up Gradation	GTVC(B) Peshawar	
10.	Mr. Sohail Anjum, (Mechanical) i. A. ii. AE (Mechanical) iii. 3 months Management training	20-11-1969 Peshawar	02-10-1993	13-01-2009	17	Up- gradation	GTVC(B) Peshawar	
11.	Muhammad Fayaz Ali, (D/Mech) i. MA ii. 18 Months TPC.	20-03-1963 Swabi	01-01-1986	01-01-2011	17	By Promotion	GTVC(B) Peshawar	

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	iii. 06 Months Inst: Trg: Course iv. 01 Year Inst: Trg: Course. v. 03 months Management training							
12.	Mr. Nawaz Nathani (RTV). i. BA L.L.B ii. 01 Year TPC iii. 06 Months Inst: Trg: Course i. 03 months Management training	28-10-1964 Peshawar	16-06-1986	26-09-2012	17	Up Gradation	GATK, Hayat Abad, Peshawar.	
13.	Mr. Nusrat Shah (Mech). i. 18 Months TPC ii. 06 Months Inst: Trg: Course. iii. 03 months Management training	16-06-1964 Peshawar	02-05-1987	26-09-2012	17	Up Gradation	GTVC(B) Peshawar	
14.	Mr. Sattar Ullah Jan (Electrical). i. G-II Level Cert: i. 18 Months TPC iii. 06 Months Inst: Trg: Course iv. 03 months Management training	15-03-1964 Karak	01-02-1986	14-12-2012	17	By Promotion	GTVC(B) Karak	
15.	Mr. Mashiat Ullah (Electrical) i. M.A ii. 18 Months TPC ii. 06 Months Inst: Trg: Course. iii. 03 months Management training	11-03-1963 D.I.Khan	01-04-1986	14-12-2012	17	By Promotion	GTVC(B) Paharpur D.I.Khan	
16.	Mr. Ihsan Ullah (Mech). i. BA ii. DAE (Mech). iii. TPC D/Mon Mechanical iv. 06 Months Inst: Trg: Course v. 01 Year Inst: Trg: Course vi. 03 months Management training	15-10-1963 D.I.Khan	05-07-1986	14-12-2012	17	By Promotion	GTVC(B) D.I.Khan	
17.	Mr. Shoukat Ayaz (Mech). i. DAE (Mech). ii. 01 Year Inst: Trg: Course iii. 03 months Management training	19-03-1963 Mardan	15-04-1987	14-12-2012	17	By Promotion	GPI, Nowshera	
18.	Mr. Sajjad Ahmed (Auto). i. DAE	03-03-1965 Peshawar	06-05-1987	14-12-2012	17	By Promotion	GTVC(B) Peshawar	

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	ii. 06 Months Inst: Trg: Course iii. 03 months Management training							
19.	Mr. Abdul Khaliq (Mech), i. DAE(Mech), ii. 01 Year Inst: Trg: Course iii. 03 months Management training	24-03-1963 Peshawar	10-05-1987	14-12-2012	17	- By Promotion	GCT, D.I.Khan	
20.	Mr. Shehzada Khan (Electrical) i. BA ii. DAE(Electrical) iii. 01 Year Inst: Trg: Course	12-04-1964 Hainpur	04-05-1988	14-12-2012	17	By Promotion	GTVC(B) Mansehra	
21.	Mr. Shafat Ullah (Electrical) i. 18 Months TPC ii. 03 months Management training	21-10-1964 Bannu	04-05-1988	14-12-2012	17	By Promotion	GTVC(B) Hangu	
22.	Mr. Nafees Ahmad Javed, (RAC) i. MA ii. 18 Months TPC iii. G-III Level Cert: iii. 06 Months Inst: Trg: Course iv. 03 months Management training	05-01-1965 Peshawar	03-09-1991	14-12-2012	17	By Promotion	GTVC(B) Peshawar	
23.	Mr. Khalid Mehmood (RTV), i. DAE (Electrical) ii. 06 Months Inst: Trg: Course iii. 03 months Management training	19-03-1966 Mansehra	05-10-1991	14-12-2012	17	By Promotion	GTVC(B) Mansehra	
24.	Mr. Ilaf Hussain Shah (RTV), i. DAE in Radio/TV Electronics ii. 06 Months Inst: Trg: Course	15-05-1968 Abbottabad	15-02-1992	14-12-2012	17	By Promotion	GCT(B) Mansehra	
25.	Mr. Tehseen Ullah (RTV), i. BA ii. DAE Radio/TV iii. 05 Months Advance Trg: from China iv. 06 Months Inst: Trg: Course	02-02-1964 Karak	14-09-1992	14-12-2012	17	By Promotion	GTVC(B) Bannu	
26.	Mr. Abdul Rashid, (Welding) i. BA ii. G-III level Cert: iii. 06 Months Tech: Teacher Trg:	13-03-1963 D.I.Khan	04-1987	14-12-2012	17	By Promotion	GTVC(B) D.I.Khan	

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28.	Mr. Naeem Samuel (Auto) i. DAE ii. 06 Months Instt: Training Course	15-01-1963 D.I.Khan	01-08-1984	19-02-2014	17	By Promotion	GVC(E) D.I.Khan
29.	Mr. Bail Ullah Jan (Civil) i. MA, Islamiyat ii. DAE Civil iii. B.Ed iv. 06 Months Instt: Trg: Course	01-10-1963 Peshawar	24-04-1988	19-02-2014	17	By Promotion	GVC(E) Peshawar
30.	Mohammad Saeed Ahmad Khan, (Electrical) i. BA ii. 18 Months TPC in Electrical iii. 06 Months Instt: Trg: Course	03-11-1964 Lakki Marwal	04-05-1988	19-02-2014	17	By Promotion	GVC(E) Bannu
31.	Mr. Ishliq Ahmed, (Electrical) i. B.Tech (Hons) ii. 06 Months Instt: Trg: Course	13-02-1964 Hailpur	21-07-1988	19-02-2014	17	By Promotion	GPI, Bunir
32.	Mr. Bashir Ahmad, (Electrical) i. BA ii. 18 months TPC iii. 01 Year TPC In (Auto) iv. 06 Months Instt: Trg: Course	02-04-1965 Charsadda	01-09-1988	19-02-2014	17	By Promotion	GPI, Tangi Charsadda
33.	Mr. Bakhtiar Ali, (Electrical) i. DAE iii. 06 Months Instt: Trg: Course	13-03-1967 Bannu	26-08-1989	19-02-2014	17	By Promotion	GVC(B) Ghazni Khel Lakki Marwal
34.	Mr. Ali Asghar Shah, (Plumber) i. G-II Level Cert: ii. G-III Level Cert: iii. 02 years Advance Teacher Training	25-01-1966 Swabi	16-02-1991	19-02-2014	17	By Promotion	GVC (B) Yar Hussain, Swabi
35.	Mr. Jamshid Anwar (Wood Work) i. 03 Years TPC ii. 06 Months TPC	20-02-1967 Swabi	19-02-1991	19-02-2014	17	By Promotion	GCT, Swabi
		13-10-1965 Peshawar	05-02-1986	05-12-2017	17	By Promotion	GVC, Mingora Swat

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36.	Mr. Sher Ali, (Auto) i. FA (ii). 01 Year TPC, iii. 06 Months TPC	09-02-1964 Swat	01-04-1987	05-12-2017	17	By Promotion	GIVC (B), Malta	
37.	Muhammad Usman, (Wood Work) i. FA ii. 02 Years TPC iii. 06 Months ITC iv. Basic Welding.	03-04-1963 Peshawar	06-05-1987	05-12-2017	17	By Promotion	GIVC (B) Peshawar	
38.	Muhammad Zeb, (Wood Work) i. 02 Years TPC ii. 06 Months ITC	01-09-1965 Peshawar	23-04-1988	05-12-2017	17	By Promotion	GIVC (B) Mardan	
39.	Mr. Ghulam Sattar (Tailoring) i. 06 Months TPC ii. 06 Months Inst: iii. G-II level Cert:	01-08-1966 Peshawar	23-04-1988	05-12-2017	17	By Promotion	GIVC (B) Peshawar	
40.	Syed Imam Hussain, (Wood Work) i. 18 Months TPC ii. 02 Years Cert: iii. 06 Months ITC	15-01-1965 Peshawar	25-04-1988	05-12-2017	17	By Promotion	GIVC (B) Gulbahar, Peshawar.	
41.	Mr. Muhammad Sammar, (Tailoring) i. 05 Years' Service in tailoring. ii. 06 Months Instructor Trg:	11-04-1965 Mardan	26-04-1988	05-12-2017	17	By Promotion	GIVC (B) Mardan	
42.	Mr. Islam ud Din (Wood Work) i. 18 Months TPC ii. 06 Months ITC	17-01-1964 D.I.Khan	30-04-1988	05-12-2017	17	By Promotion	GIVC (B) D.I.Khan	
43.	Mr. Abdul Rashid, (Tailoring) i. 18 Months TPC (WLD) ii. 06 Months TPC (Mason) iii. 12 Months TPC (Carpenter) iv. 06 Months Instt: Trg. Course	03-03-1966 D.I.Khan	02-05-1988	05-12-2017	17	By Promotion	GIVC (B), Tank	
44.	Mr. Shabir Hussain, (Tailoring) i. 06 Months TPC (Tailoring) ii. G-III level Cert: iii. G-II level Cert: iv. 06 Months ITC	17-02-1965 Peshawar	03-05-1988	05-12-2017	17	By Promotion	GIVC (B) Peshawar	ATTESTED
	Mr. Ali Muhammad, (Tailoring) i. 18 Months TPC (D/Man Mech) ii. 06 Months Inst: Trg. Course	15-04-1963 D.I.Khan	05-05-1988	05-12-2017	17	By Promotion	GCT, Bannu	
46.	Mr. Ijaz Ahmed, (Electronics)	24-02-1964	12-05-1988	05-12-2017	17	By	GIVC (B),	

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	i. 06 Months ITC ii. G-II level Cert: (Wood Work) iii. 18 Months ITC iv. 06 Months ITC.	D.I.Khan								
47.	Muhammad Shah (Tailoring) i. Training Certificate ii. 06 Months ITC.					Promotion	D.I.Khan			
48.	Mr. Rehmat Karim, (Wood Work) i. DAE ii. 06 Months ITC	13-11-1964 Mardan	07-09-1988	05-12-2017	17	By Promotion	GCT Bajour			
49.	Mr. Najeeb Ullah Khan, (Auto) i. DAE (Auto) ii. 02 Years TPC iii. G-III level. v. 06 Months ITC	20-10-1966 Chitral	25-06-1988	05-12-2017	17	By Promotion	GTVCY(B) Chitral			
		01-01-1963 Swat	07-11-1988	05-12-2017	17	By Promotion	GTVC(B), Mingora Swat			
50.	Mr. Muhammad Jamil, (Tailoring) i. BA ii. 06 Months TPC. iii. 06 Months Instt: Trg. Sti, Pesh.	14-04-1967 Peshawar	03-05-1988	05-12-2017	17	By Promotion	GPI Sardar, Garhi			
51.	Syed Yousaf Ali shah, (Wood Work) i. DAE ii. 06 Months ITC	07-11-1966 Peshawar	01-02-1992	05-12-2017	17	By Promotion	KP-TEVTA, Head Office			
52.	Mr. Adeel Azam, (Plumber) i. 18 Months TPC ii. 01 Year ITC Course	07-07-1968 Peshawar	16-04-1987	05-12-2017	17	By Promotion	GTVC(B) - Peshawar			
53.	Mr. Jehan Zeb Khan, i. DAE (Mech) ii. 1 Year ITC Course.	07-06-1966 Peshawar	01-08-1988	05-12-2017	17	By Promotion	GTVC (B) Peshawar.			
54.	Mr. Shujat Ali, (Mech) i. BSC ii. DAE iii. 06 Months ITC	10-03-1966 D.I.Khan	05-09-1989	05-12-2017	17	By Promotion	GCT, D.I.Khan			
55.	Mr. Ajmal Khan, i. B.A ii. DAE (Mech) iii. 06 Months ITC Course	17-09-1964 Bannu.	13-09-1989	05-12-2017	17	By Promotion	GTVC(B), Peshawar			
56.	Mr. Saleem Ahmad, (D.Man Civil) i. B.A ii. DAE Civil)	01-04-1964 D.I.Khan	25-09-1989	05-12-2017	17	By Promotion	GPI, Haripur			

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iii. 06 Months ITC Course							
57.	Mr. Rahim Ur Rehman, (Mech) i. MA ii. DAE (Mech) iii. 01 Year ITC Cour.	01-01-1965 Swal	16-09-1990	05-12-2017	17	By Promotion	GTVC (B), Mingora Swal
58.	Mr. Murid Hussain, i. DAE in (Mechanical)	07-01-1965 D.I.Khan	06-02-1991	05-12-2017	17	By Promotion	GTVC (B), Paharpur DIK
59.	Mr. Shafqat Ullah, (Electrical) i. 03 Years DAE ii. 06 Months ITC.	09-05-1967 Bannu	01-07-1991	05-12-2017	17	By Promotion	GTVC (B) Peshawar
60.	Muhammad Jamil, (Electrical) i. 18 Months TPC ii. 06 Months ITC. iii. G-II TPC	10-05-1969 Haripur	14-05-1992	05-12-2017	17	By Promotion	GTVC (B) Paharpur D.I.Khan
61.	Mr. Fazal Rehman, i. DAE (D/M Civil) ii. 06 Months ITC	09-03-1963 D.I.Khan	15-06-1992	05-12-2017	17	By Promotion	GTVC (B) Paharpur D.I.Khan
62.	Mr. Asif Daud, i. DAE (Mech) ii. MA iii. 06 Months ITC Course	05-05-1966 Peshawar	01-07-1992	05-12-2017	17	By Promotion	GTVC (B) Peshawar
63.	Mr. Sher Ali Baz Khan, (Plumber) i. MA ii. G-II Level Cert (iii). G-III Level Cert. iv. 01 Year ITC	20-01-1964 Bannu	17-08-1992	05-12-2017	17	By Promotion	GCT, Bannu
64.	Mohammad Ayaz Khan, i. BA ii. 03 Years DAE (Electrical) iii. 06 Months ITC	01-07-1967 Peshawar	30-08-1992	05-12-2017	17	By Promotion	GTVC (B) Peshawar
65.	Mr. Hayat Khan, (D/M Civil) i. B.A (ii). DAE (D/M Civil) iii. 06 Months ITC	10-11-1966 Lakki Marwal	14-10-1992	05-12-2017	17	By Promotion	GTVC (B) D.I.Khan
66.	Mr. Qamar Ali, (Auto) i. DAE ii. 06 Months ITC	19-01-1964 Swabi	01-11-1992	05-12-2017	17	By Promotion	GTVC (B) Peshawar

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67.	Mr. Dil Jan Khan, i. DAE (Mech) ii. 06 Months ITC	05-12-1969 Lakki Marwal	29-12-1992	06-12-2017	17	By Promotion	GCT, D.I. Khan
68.	Mr. Zafar Iqbal, (Wood Work) i. F.A (ii). 02 Years TPC iii. 06 Months ITC	01-12-1967 Peshawar	20-02-1993	05-12-2017	17	By Promotion	GTVC (B) Peshawar
69.	Mr. Shoukat Ali, (RAC) i. G-II Level TPC ii. 5 Months AT in PR iii. 06 Months ITC	08-12-1962 Bannu	02-09-1993	05-12-2017	17	By Promotion	GCT, Bannu.
70.	Mr. Hamayun Khan, (Mechanical) i. B.A. ii. DAE. iii. 06 Months ITC, Cert	16-02-1971 Khyber Agency	29-05-1997	05-12-2017	17	By Promotion	GTVC(B) Peshawar
71.	Mr. Asghar Khan, (RAC) i. B. Sc ii. G-II Level TPC RAC iii. 06 Months ITC	18-02-1968 Kohat	17-04-1995	05-04-2018	17	By Promotion	GCT, Kohat
72.	Mr. Amjad Waheed Khan, i. BA/DAE (Mechanical) iii. 06 Months Course: AITC iv. 06 Months ITC	03-09-1971 D.I. Khan	24-06-1997	05-04-2018	17	By Promotion	GCT, D.I.Khan
73.	Mohammad Nawab, DAE Electrical	16-03-1966 Swabi	01-06-1999	25-10-2018	17	By Promotion	GCT, Swabi
74.	MR. Gul Razim Khan, i. Matric (ii). G-II RAC iii. 06 Months ITC, from NTB, Islamabad.	08-08-1971 Bannu	06-06-2002	25-10-2018	17	By Promotion	GTVC(B) Bannu
75.	Mr. Laiq Muhammad. (Wood Work) i. Matric. (ii). 02 years TPC iii. 06 Months ITC	11-12-1965 DIR	12-04-1987	28-10-2019	17	By Promotion	GTI, Ekka Ghund.
76.	Syed Kiramat Ali Shah. i. DAE (AUTO MECHANIC) ii. 01-year G-III iii. 06 Months ITC	10-05-1975 Abbottabad	18-03-1999	28-10-2019	17	By Promotion	GTVC(B) Peshawar

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77.	Mr. Razim Ullah. i. FA/02-year Certificate (Electrical) ii. 06 Months ITC	19-01-1965 Nowshera	18-12-1985	28-10-2019	17	By Promotion	GPI, Nowshera
78.	Mr. Saqib Shah. i. 02-year Certificate (Electrical) ii. 06 Months ITC	06-01-1964 Peshawar	19-03-1986	28-10-2019	17	By Promotion	GTVC(B), Peshawar
79.	Mr. Straj Ul Islam(RAc) i. DAE ii. 06 Months ITC	10-01-1970 Mardan	14-05-1966	28-10-2019	17	By Promotion	GATTC, Hayatabad, Peshawar.
80.	Mr. Rana Ajmal Khan (Tailoring) i. Matric ii. 06 Months ITC	01-04-1978 D.I. Khan	25-04-2006	28-10-2019	17	By Promotion	GTVC(B), D.I. Khan
81.	Mr. Sher Aslam i. 02 year Certificate (Electrical) ii. 06 Months ITC	01-01-1963 Haripur	30-08-1993	28-10-2019	17	By Promotion	GTVC (B) KTS, Haripur.
82.	Mr. Siraj Ahmad i. DAE (Mechanical) ii. 06 Months ITC	01-01-1970 Abbottabad	05-05-2006	28-10-2019	17	By Promotion	GTVC (B) KTS, Haripur.
83.	Syed Yawar Ali Shah i. DAE (Auto Mechanic) ii. 06 Months	01-04-1980 Charsadda	13-05-2006	28-10-2019	17	By Promotion	GPI, Ekka Ghund.

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NO. SO-III (IND)4-7/17/SLI /545-47

Copy is forwarded to:-

1. The Managing Director KP-TEVTA.
2. The Principal GCT's/GPI's & GTI's.

**ATTESTED**

CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

Dated 13-06-2022.

*[Signature]*

Section Officer-III

Industries, Commerce & Technical Education Department.

**ATTESTED**

24



GOVERNMENT TECHNICAL TEACHERS TRAINING COLLEGE  
HAYATABAD PESHAWAR



Registration No. GTTC/3M/2021/131

# CERTIFICATE OF TRAINING

awarded to

**MR. ABDUR RASHID KHAN**

S/O

**ADAM KHAN**

upon successful completion of the training program

**"03-MONTHS MANDATORY MANAGEMENT  
TRAINING"**

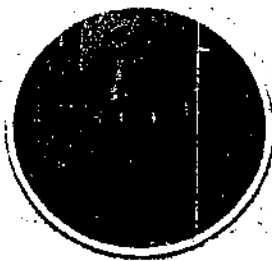
held from 1<sup>st</sup> April 2021 to 30<sup>th</sup> June 2021

at Govt Technical Teachers Training College Hayatabad Peshawar

Organized by  
Khyber Pakhtunkhwa Technical Education & Vocational Training Authority  
K.P.T.E.V.T.A.

**KHYBER PAKHTUNKHWA**

*Iftikhar Hussain*  
Iftikhar Hussain  
Controller of Examination  
GTTC Hayatabad



*Dr. Hazrat Hussain*  
Dr. Hazrat Hussain  
Principal  
GTTC Hayatabad

**ATTESTED**

**ATTESTED**

Annex D 26

88

To

The Secretary to Govt; of Khyber Pakhtunkhwa  
Industries, Commerce & Technical Education  
Peshawar

THROUGH: PROPER CHANNAL

SUBJECT: REQUEST FOR PROMOTION FROM BPS-17 TO BPS -18

With due respect it is stated that I want to draw your kind attention to the following few lines for favorable & sympathetic consideration please.

- That I have served as Instructor in BPS 14 for about 25 years & was promoted to the next scale (BPS-17) after 25 years in the end of 2012 in spite the fact that posts of Senior Instructors were lying vacant since long.
- That the applicant has completed 03 Months Mandatory Management Training due for promotion arranged by the Department.
- That the applicant fulfill the required qualification, Training and length of service for promotion.
- That 26 Posts of Principals / Vice Principals (BPS-18) are lying Vacant since long.
- That the applicant will attain the age superannuation on 12-03-2023.
- That my Seniority position is 26 in the seniority list.
- That an application has already sent to the Managing Director KP-TEVTA but no reply has received so far.
- The undersigned along with my other counterparts got three months mandatory Training in the age of 58 years for promotion but we are deprived from our due right

Keeping in view the above facts it is therefore most earnestly requested that my case may very kindly be considered on humanitarian grounds & I may please be promoted as Principal / Vice Principal (BPS- 18) to reach the justice to its ends & I may be saved from mentally & financially torture.

Positive response in this connection is once again requested.

Truly

Yours Obediently

A. Khan

MANAGING DIRECTOR, KP-TEVTA

10-1-2023

Date: 10/1/2023

ATTESTED

27  
Annex E

Confidential



Khyber Pakhtunkhwa  
Technical Education & Vocational Training  
Authority KP TEVTA  
Old Bara Road, University Town  
Peshawar

**TEVTA**  
KHYBER PAKHTUNKHWA

No. TEVTA/PER: 1347

Dated. 10/02/2023

To

The Secretary,  
Industries, Commerce and Technical Education Department,  
Khyber Pakhtunkhwa Peshawar.

Subject: -

PROMOTION OF SENIOR INSTRUCTOR (BPS-17) GTVCs  
/GATTTC TO THE POST OF PRINCIPAL / VICE PRINCIPAL  
(BPS-18) AT GOVT: TECHNICAL & VOCATIONAL CENTRES.

R/Sir,

I am directed to refer to the subject noted above and to enclose herewith 09 sets of working paper along with its enclosure complete in all respect in favour of Senior Instructors GTVCs (BPS-17) for promotion to the post of Principal / Vice Principal (BPS-18) at Government Technical & Vocational Centres (Boys) in the Khyber Pakhtunkhwa Technical & Vocational Training Authority Peshawar.

It is, therefore, requested to process the subject case with the quarter concern for placing before the Provincial Selection Board, please.

Encl: As above.

ATTESTED

DIRECTOR (ADMN/HR)  
KP-TEVTA

10/02/23

ATTESTED

18/18  
S.A. I.I.S

Secretary to the Govt. Industries, Commerce & Technical Education Department.  
Secretary to the Govt. KPK Establishment Department.

Copy for information in advance to

ATTENDED

S/No	Name & Designation	Date of Retirement
1	Muhammad Hassan, Senior Instructor	02-10-2022
2	Mr. Shoukat Ali, Senior Instructor	08-12-2022
3	Mr. Najeeb Ullah, Senior Instructor	31-12-2022
4	Mr. Qayum Khan, Senior Instructor	14-01-2023
5	Mr. Mashayef Ullah, Senior Instructor	10-03-2023
6	Abdur Rashid, Senior Instructor	12-03-2023
7	Mr. Shoukat Ayaz, Senior Instructor	18-03-2023
8	Muhammad Fayaz Ali, Chief Instructor	19-03-2023
9	Abdul Khaliq, Senior Instructor	23-03-2023
10	Muhammad Usman, Senior Instructor	02-04-2023
11	Ali Muhammad, Senior Instructor	14-04-2023

Processed  
10 papers  
to PAF  
3 MD  
5 MD  
D.I. 171

Regards

Your early action in this regard will highly be appreciated.

enabling them to get their promotion before their retirement

whose document are complete in all respect may kindly be placed before the PSB for the consideration

is, therefore, requested that promotion case of the retiring officers above will

due light of promotion.

to be finalized/processed within the due cutoff date as mentioned above, they will be deprived from the

If the working paper of the above said incumbents who are working in near future will not

document are complete in all respect for submission before the PSB for consideration within cutoff date

no of D.S. 17 incumbents are in the range of retirement up to April 2023 and their final

is worth to mention that from S/No 1 to 11 (10 S/No) of the working paper D.S. 17 in which

of the last incumbents who are in the period of retirement

for promotion from D.S. 17 to D.S. 18 of vocational stream has not yet been finalized due to delay

There are 30 no of D.S. 18 D.O.M. are being vacated for promotion, however the working

above and to take into account the cutoff date for submission of working paper in this regard

Reference will be made to the working paper no. 17/02/2023 dated 17.02.2023 on the subject

RETC

SECRETARY

SECRETARY

Working paper no. 17/02/2023 dated 17.02.2023 on the subject  
17/02/2023  
17/02/2023  
17/02/2023  
17/02/2023

28

28/1

*[Handwritten signature]*

**BETTER COPY**

To  
The Managing Director  
KP-TEVTA, Peshawar.

Through: Proper Channel

SUBJECT: STREAMLINING OF PROVINCIAL SELECTION BOARD (PSB)  
MEETING DATED \_\_\_\_\_

Reference letter No. \_\_\_\_\_ dated 11-08-2022 on the subject titled above and so state that the cut off date for submission of \_\_\_\_\_ paper on \_\_\_\_\_.

There are 30 No of BPS-18 posts are lying vacant for \_\_\_\_\_ however for promotion from BPS-17 to BPS-18 of Vocational Stream has not yet been \_\_\_\_\_ of PER's of the facts incumbent who are in the panelist of promoters.

It is worth to mention that from S/No 1 to S/No 20 of the Seniority list BPS-17 \_\_\_\_\_ No. of BPS-17 incumbents are at the verge of retirement w.e.f September to April 2023 where there entire documents are complete in all respect for submission before the \_\_\_\_\_ for consideration within cutoff date.

If the working paper of the above said incumbents who are retiring in near future will not be finalized/processed within the due cutoff date as mentioned above, they will be deprived from there due right of promotion.

It is therefore, requested that promotion case of the retiring officers alongwith whose document are complete in all respect may kindly be placed before the PSB for its consideration enabling them to get their promotion before the retirement.

Your early action in this regard will highly be appreciated

Regards

S. No	Name & Designation	Date of Retirement
1.	Muhammad Hassan, Senior Instructor	02-10-2022
2.	Mr. Shoukat Ali, Senior Instructor	08-12-2022
3.	Mr. Najeeb Ullah, Senior Instructor	31-12-2022
4.	Mr. Qayum Khan, Senior Instructor	14-01-2023
5.	Mr. Mashyet Ullah, Senior Instructor	10-03-2023
6.	Abdur Rashid, Senior Instructor	12-03-2023
7.	Mr. Shoukat Ayaz, Senior Instructor	18-03-2023
8.	Muhammad Fayaz Ali, Chief Instructor	19-03-2023
9.	Abdul Khaliq, Senior Instructor	23-03-2023
10.	Muhammad Usman, Senior Instructor	02-04-2023
11.	Ali Muhammad, Senior Instructor	14-04-2023

**ATTESTED**

Copy for information in advance to

1. Secretary to the Govt. Industries Commerce & Technical Education Department.
2. Secretary to the Govt. KPK Establishment Department.

**ATTESTED**

*[Handwritten signature]*



29

TO BE SUBSTITUTED WITH EVEN NO. 3664-67 DATED 20.09.2022



GOVERNMENT OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE & TECHNICAL  
EDUCATION DEPARTMENT

NOTIFICATION

No.SOIII(IND)4-11/2022/Fayaz/561-64 In terms of provision of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules-1981 and instructions issued thereunder from time to time, sanction is hereby accorded to the encashment of leave in lieu of L.P.R equal to 365 days in favour of Muhammad Hassan, Vice Principal / Principal BPS-18 Government Technical Teacher Training College Hayatabad, Peshawar.

2. In terms of Section-13 of the Khyber Pakhtunkhwa Civil Servant Act 1973, the officer has been retired from government service on attaining the age of superannuation with effect from 02.10.2022 (A.N). The date of birth of the officer is 03.10.1962.

Secretary to Govt. of Khyber Pakhtunkhwa,  
Industries, Commerce & Technical  
Education Department

Endst:No.SOIII(IND)4-11/2020/Fayaz/

Dated Pesh. the 17<sup>th</sup> November, 2022

Copy is forwarded for information to:-

1. The Accountant General, Government of Khyber Pakhtunkhwa
2. The Managing Director, KP-TEVTA
3. The Principal, Government Technical Teacher Training College Hayatabad, Peshawar
4. Officer concerned

*M. Anjum Ali*  
SECTION OFFICER-III 17/11/2022

**ATTESTED**

**ATTESTED**

Annex

30



GOVERNMENT OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE & TECHNICAL  
EDUCATION DEPARTMENT

NOTIFICATION

No.SOU(IND)/Retirement/2023/Vol-I/355-58 In terms of provision of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules-1981 and instructions issued there under from time to time, sanction is hereby accorded to the encasement of leave in lieu of L.P.R equal to 365 days in favor of Mr. Abdur Rashid Khan, Senior Instructor (BPS-17) Government Technical and Vocational Centre (B) DI Khan

2. In terms of Section-13 of the Khyber Pakhtunkhwa Civil Servant Act 1973, the officer will retire from government service on attaining the age of superannuation with effect from 12.03.2023 (A.N). The date of birth of the officer is 13.03.1963.

Secretary to Govt. of Khyber Pakhtunkhwa,  
Industries, Commerce & Technical  
Education Department

Enclst: No.SOU(IND)/Retirement/2023/Vol-I/

Dated Pesh. the 11<sup>th</sup> April, 2023

Copy is forwarded to the:-

1. Managing Director, KP-TEVTA
2. District Accounts Officer, DI Khan
3. Principal, Government Technical and Vocational Centre (B) DI Khan
4. Officer concerned

Principal

*J. S.*  
PRINCIPAL  
Govt. Technical Vocational  
Centre (B) DI Khan

*[Signature]*

SECTION OFFICER-III

**RECEIVED**

ATTESTED

Risayat

## IN THE PESHAWAR HIGH COURT, PESHAWAR



Writ Petition No \_\_\_\_\_/2023

1. Muhammad Usman, Senior Instructor (Retd), GTVC (B) Gulbahar, Peshawar
  2. Abdur Rasheed Khan, Senior Instructor (Retd), GTVC (B), D.I Khan
- .....Petitioners

Versus

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar
  2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
  3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
  4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
  5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
  6. Managing Director, KP, TEVTA
- .....Respondents

Writ Petition under Article 199 of The  
Constitution of Islamic Republic of Pakistan, 1973

Respectfully Sheweth,

The Petitioners humbly craves permission to plead for solace of their grievance while invoking the constitutional jurisdiction of this Honorable Court as under:

**Brief but relevant facts warranting this Writ Petition**

1. That the Petitioners were initially appointed as Instructors (BPS-14) in the respondent Department. Later on, the Petitioners were promoted to the post of Senior Instructor (BPS-17) vide Notification dated 05-12-2017. (Copy of Notification is filed herewith and annexed as Annex-A)
2. That as per service rules of the respondent department framed vide Notification dated 24-11-2017, the post of Principal/Vice Principal (BPS-18) is to be filled by promotion, on the basis of seniority cum fitness from amongst the Chief Instructors, Training Managers, Vice Principals, Senior Instructors, Trainers and Staff Trainers (BPS-17) having Management training Course of not less than cumulative period of three months and Instructor Training Course of not less than six months from a recognized Institute with five years service as such. (Copy of Service Rules is filed herewith and annexed as Annex-B)
3. That in the respondent Department 38 posts of Principals/Vice Principals (BPS-18) are lying vacant. The Petitioner No 1 is at Serial No 37 and Petitioner No 2 is at Serial No 26 of the Final Seniority list of Chief

**ATTESTED**

ATTESTED  
KAMBER  
Peshawar High Court

Instructor/Training Manager/Senior Instructor/Trainer/Staff Trainer (BPS-17) circulated vide Notification dated 13-06-2022. The Petitioners have served for more than five years as Senior Instructors (BPS-17) in the respondent Department and a part from this the Petitioners have completed the requisite courses, thus the Petitioners are fit and eligible to be promoted to the post of Principal/Vice Principal (BPS-18). (Copy of Seniority list and Certificates of requisite Courses are filed herewith & annexed as Annex-C)

- 4. That the Petitioners approached the respondents for considering them for promotion to the post of Principal/Vice Principal (BPS-18) by filling applications. (Copy of application is filed herewith and annexed as Annex-D)
- 5. That the aforesaid applications of the Petitioners along with one Mr Muhammad Hassan, Senior Instructor were sent to the competent authority for placing their cases before the PSB vide letter dated 10-02-2023. The said Mr Muhammad Hassan, Senior Instructor has been promoted to BPS-18 which is evident from the Notification dated 17<sup>th</sup> November, 2022, whereas the Petitioners have been deprived from promotion. The Petitioner No 1 has retired from government service vide Notification dated 13-02-2023 and Petitioner No 2 has retired from government service on attaining the age of superannuation on 12-03-2023. (Copies of letter and Notifications are filed herewith and annexed as Annex-E & F)

Thus, the Petitioners feeling aggrieved of the inaction of the respondents, having no other adequate, alternate and efficacious remedy are constrained to approach this Honorable Court in its constitutional jurisdiction on the following amongst other grounds:

**Grounds:**

- a. That the treatment met out to the Petitioners is against the law, illegal, unlawful and without lawful authority, thus calling interference of this Honorable Court in its constitutional jurisdiction.
- b. That as per service rules of the respondent department, the Petitioners are fit and eligible to be promoted to the post of Principal/Vice Principal (BPS-18).
- c. That before superannuation, the Petitioners as per relevant service rules were fit and eligible for promotion, thus were due for their promotion but have been made to suffer merely on account of departmental lapse of not holding PSB meeting before their superannuation. The Petitioners have been deprived of their vested right of consideration for promotion due to act of respondents which has caused them permanent loss of pensionary benefits of higher grade despite the fact that the Petitioners were pursuing their promotion cases diligently and have filed written representation well within time before their superannuation.

**ATTESTED**

**ATTESTED**  
EXAMINER  
Department of High Court

- d. That the Petitioners are a civil servants and the posts of Principal/Vice Principal (BPS-18) are lying vacant, the Petitioners have been denied promotion before superannuation without any fault on their part.
- e. That the treatment met to the Petitioners is against the fundamental rights enshrined and protected under the Constitution of Islamic Republic of Pakistan, 1973.
- f. That the treatment met out to the Petitioners is against the principles of natural justice and settled principles of administrative law.
- g. That the Petitioners crave permission of this Honorable Court to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.

It is, therefore, prayed that on acceptance of this Writ Petition an appropriate Writ may kindly be issued to the effect to direct the respondents to convene the meeting of Provincial Selection Board, prepare the promotion papers of the Petitioners and place the same before the next Promotion Selection Board meeting for consideration of the Petitioner's proforma promotion to the posts of Principal/Vice Principal (BPS-18) with all back benefits.

Grant any additional, further, better and or alternative relief that this Honorable Court may deem fit to grant in the circumstances of this case.

Petitioners,  
Through  
Muhammad Ayub Khan Shinwari  
Advocate Supreme Court

**Interim Relief:**

In view of all the ingredients requisite for interim relief, it is prayed that the respondents be restrained from taking any adverse action against the Petitioner till the final disposal of the Writ Petition.

Advocate

**List of Books:**

Constitution of Islamic Republic of Pakistan, 1973 and any other law book as per need.

Advocate

**Certificate:**

As per information furnished to me by my Petitioners it is certified that no such like petition on the subject matter has earlier been filed by the Petitioners before this court or any other court.

Advocate

ATTESTED ATTESTED  
EXAMINER

Annex 34

IN THE PESHAWAR HIGH COURT, PESHAWAR

WRIT PETITION NO. 3474-P/2023

Muhammad Usman, Senior Instructor(Retd), GTVC (B) Gulbahar, Peshawar

Abdur Rasheed Khan, Senior Instructor (Retd), GTVC (B), D.I Khan

..... Petitioners

Versus

1. Chief Secretary, Government of Khyber Pakhtunkhwa Peshawar
2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
6. Managing Director, KP- TEVTA

..... Respondents.

INDEX

S.No	Description of documents	Annex	Page No
1.	Para wise Comments	--	1-2
2.	Affidavit	--	3

**ATTESTED**

35

IN THE PESHAWAR HIGH COURT, PESHAWAR

WRIT PETITION NO. 3474-P/2023

Muhammad Usman, Senior Instructor(Retd), GTVC (B) Gulbahar, Peshawar

Abdur Rasheed Khan, Senior Instructor (Retd), GTVC (B), D.I Khan

..... Petitioners

Versus

1. Chief Secretary, Government of Khyber Pakhtunkhwa Peshawar
2. Secretary, Industries, Commerce and Technical Education Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
3. Chairman, Provincial Selection Board, Govt of Khyber Pakhtunkhwa, Peshawar
4. Secretary, Establishment Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
5. Secretary, Finance Deptt, Govt of Khyber Pakhtunkhwa, Peshawar
6. Managing Director, KP- TEVTA

..... Respondents.

**PRELIMINARY OBJECTIONS:**

- I. The Writ Petition has for its subject matter, terms and condition of service of a civil servant, which cannot be adjudicated under 212 of the constitution.
- II. That this honorable court has no jurisdiction to entertain the instant petition.
- III. That the writ petition is time barred.
- IV. That the petitioners have no cause of action.
- V. That the petitioners have got no locus standi.
- VI. That the petition is incompetent in its present form for mis joinder and non-joinder of the necessary parties.
- VII. That the petitioners have not come to this honorable court with clean hands.
- VIII. That the petitioners are legally estopped by their own conduct to file the present petition.
- IX. That the petition is not maintainable.

**Respectfully Sheweth:**

- 1- Pertains to records.
- 2- Pertains to records.
- 3- Misconceived as laid. This honorable court cannot delve in to the matter of promotion, which are exclusively terms and condition of service.
- 4- Pertains to records.
- 5- It is incorrect as laid. It is quite apparent from the face of the record that the petitioners seeks enforcement of his terms and conditions of service through writ jurisdiction, the same are not allowed in light of specific bar of Article 212 of constitution. It is also mentioned that the promotion cases of the retired employees do not fall within the ambit of Provincial Promotion Policy 2009 of the Government. Hence their cases could not be placed before the PSB forum.

**Grounds:**

- a- It is incorrect. The cases of the petitioner have been dealt in accordance with Provincial Promotion Policy 2009 of the Government. Again reiterated that terms and conditions cannot be enforced /invoked through writ jurisdiction due to express bar of Article 212.
- b- It is incorrect in view of aforementioned comprehensive reply.

**ATTESTED**

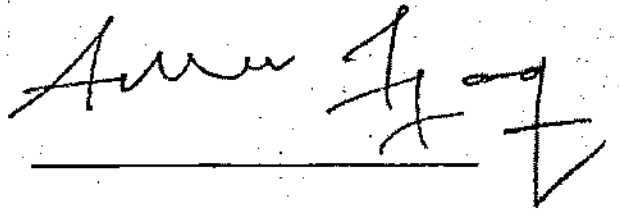
- c- It is incorrect. The promotion cases of the petitioners were in processed with in accordance with laid down procedure.
- d- It is incorrect in view of aforementioned comprehensive reply.
- e- It is incorrect in view of aforementioned comprehensive reply.
- f- It is incorrect in view of aforementioned comprehensive reply.
- g- That the respondent seek permission of the honorable court to rely on other defense ground at time of arguments and produce any additional document if required in support of their defense.

In view of the above, it is evident that the instant petition has no force of law and facts. It is, therefore, requested that the instant petition may be dismissed.

**Secretary to Govt: of Khyber Pakhtunkhwa,  
Industries, Commerce and Technical Education  
Department.  
Respondent No.2**



**Managing Director,  
Khyber Pakhtunkhwa Technical Education  
& Vocational Training Authority  
Respondent No.6**

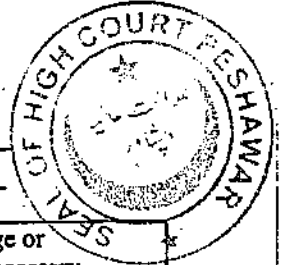


**ATTESTED**



PESHAWAR HIGH COURT, PESHAWAR  
FORM "A"  
FORM OF ORDER SHEET.

Court of \_\_\_\_\_  
Case No \_\_\_\_\_



Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of judge or Magistrate and that of parties or counsel where necessary
1	2	3
	30.05.2024	<p><b><u>W.P No. 3474-P/2023 with IR</u></b></p> <p><b><u>Present:-</u></b> Mr. Muhammad Ayub Khan Shinwari, advocate for the petitioners.</p> <p>Mr. Ali Gohar Durrani, advocate for the respondents.</p> <p>*****</p> <p><b><u>IJAZ ANWAR.J.</u></b> At the very outset, counsel for respondents objected to the maintainability of instant writ petition in view of the bar contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973. When confronted, counsel for petitioners stated that the instant writ petition be treated as Departmental appeal and send to the Service Tribunal for decision.</p> <p>2. In terms of Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, this Court can only entertain a writ petition where there is no other adequate remedy available while in the instant matter, there is an alternate and efficacious remedy of filing appeal is available to the petitioners. As such, we instead of dismissing this</p>

*[Handwritten mark]*

*[Handwritten signature]*  
ATTESTED  
BY EXAMINER  
PESHAWAR HIGH COURT

petition, treat it as a service appeal and transmit it to the Khyber Pakhtunkhwa Service Tribunal, (KPST) for its decision strictly in accordance with law. Office shall retain copy of the memo of this petition and transmit the original writ petition alongwith its annexures to the KPST, Peshawar. Separate copies of the petition be provided to the petitioners in terms of Khyber Pakhtunkhwa Service Tribunal Rules, 1974 to be presented as appeals before the Tribunal. Petitioners shall appear before the Tribunal on 24.6.2024.

*[Signature]*  
 Senior  
 Puisne Judge

*[Signature]*  
 Judge

Announced.  
 Dated. 30.5.2024.

49397  
 Date of Presentation of Application. 20-06-2024  
 No of Pages 6  
 Copying fee 24-00  
 Total 20-06-2024  
 Date of Preparation of 20-06-2024  
 Date of Delivery of Riazayat

CERTIFIED TO BE TRUE COPY  
 EXAMINER  
 Peshawar High Court, Peshawar  
 Authorized Under Article 8, 7 of  
 the Qanun-e-Shahadat Act 1934  
 20 JUN 2024

ATTES

بعدالت  
 صید شہسو خانہ کراچی  
 (کراچی)



28 مئی 2011ء  
 صید شہسو خانہ کراچی

موزخہ  
 مقدمہ  
 دعویٰ  
 جرم

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آن مقام سید شہسو خانہ کراچی کیلئے محمد ریون سن اور دکن  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا گیا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ  
 پر داخلہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہوگا۔  
 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۔

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