


FORM OF ORDER SHEET

Court of _____

Appeal No. 1245/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/8/2024	<p>The appeal of Mr. Abdul Kabir presented today by Mr. Yaqoob Khan Advocate. It is fixed for preliminary hearing before Touring Single Bench at Swat on 7/10/2024. Parcha Peshi given to counsel for the appellant .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Abdul Kabir received today i.e on 05.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of appellant and respondent no. 4 is incomplete be completed according to rule 6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Copy of seniority list mentioned in para-7 of the memo of appeal (Annexure-C) is not attached with the appeal be placed on it.
- 3- Annexures F mentioned in the grounds of appeal is missing.

No. 530 /Inst./2024/KPST,

Dt. 6/8 /2024.

Amatullah
OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Yaqub Khan Adv.
High Court at Peshawar.

19/8/2024

Sir,
objections removed, completed
and re-submitted please.

Yaqub Khan Advocate
Mardan

19/8/2024

Yaqub

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Abdul Karbiy

CHECK LIST

Education

versus D4 Health

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Advocate</u> <u>Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- Yaqoob Khan

Signature:- [Handwritten Signature]

Before the Service Tribunal, KPK, Peshawar

Abdul Kabir son of Ahmed Khan GHS Dürushkhela Swat, R/o SwatAppellant

V/S

1. Secretary of Education, KPK, Peshawar
2. Director Education officer, KPK, Peshawar
3. Mazhar Ul Haq S/o Nazir Muhammad SST IT GHSS Kambat Dir Lower R/o Kambat, Lower Dir
4. Mehmood Rehman son of Muhammad Rehman SSTI Teacher Chokara, Karak R/o KarakRespondents

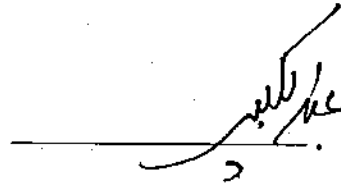
APPEAL

INDEX

S.No	Descriptions	Annex:	Pages	
			From	to
1	Grounds of appeal		1	3
2	Copy of appointment order	"A"	4	10
3	Copy of seniority list	"B"	11	12
4	Copy of representation	"C"	13	14
5	Copy of judgment	"D"	15	25
6	Copies of orders	"E"	26	29
7	Wakalat Nama		—	30

Dated

Appellant



Through



Yaqoob Khan advocate High courts at Distt: courts Mardan

Before the Service Tribunal, KPK, Peshawar

①

Appeal no 1245/2024

L SST IT

Abdul Kabir son of Ahmed Khan [GHS Durushkhela Swat R/o Swat

Appellant Peshawar Service Tribunal

v/s

Diary No. 14681

1. Secretary of Education, KPK, Peshawar
2. Director Education officer, KPK, Peshawar
3. Mazhar Ul Haq S/o Nazir Muhammad SST IT GHSS Kambat Dir Lower R/o Kambat, Lower Dir
4. Mehmood Rehman son of Muhammad Rehman SSTI Teacher Chokara, Karak R/o Karak Respondents

Dated 05-08-2024

Service Appeal under section 4 of the Service Tribunal Act 1974 for grant of seniority of appellant on the basis of age wise for which appellant filed a representation dated 29/04/2024 before respondent NO.1 for grant of seniority on the basis age senior/ higher from other employees appointed on the same date of appellant and after lapse of 90 days, appellant filed instant service appeal before this Hon'able court.

Prayer;

on acceptance of this appeal, appellant may please be declared senior than those SST IT teachers who are junior in age than appellant and who were appointed on the same date of appointment of appellant on the basis of judgment passed by this Hon'able Tribunal vide order / judgment dated 31/05/2023 and notification dated 26/06/2024 and 20/05/2024. Any other relief deemed fit may also be graciously awarded.

Filed today
Registrar
5/8/24

Respected Sir,

Appellant Humbly submits as under

Re-submitted to day
and filed.
Registrar
24/8/24

1. That appellant is posted as SST IT Teacher with respondent department and performed his duty regularly.
2. That respondent department has advertized the posts of SST teacher for which appellant was properly applied and qualified the test/interview for their posts of SST teacher.
3. That appellant was appointed as SST IT teacher vide appointment order dated 24/08/2017 on regular basis. (Copy of appointment order is attached as Annex: "A").
4. That service of appellant is regularized from the date of appointment.
5. That the seniority list of the appellant as well as other SST teacher was drawn on the basis of the

score obtained by them in the test conducted by national testing service (NTS) while as per law the seniority of appellant is of the view that seniority inter se was required to have been fixed age wise in view clause 8 of terms and conditions of regularization order as well as sub section 2 of section 4 of KPK employees of E & SE department. (appointment and regularization of svc Act 2017, coupled with the judgment of this Hon'able court dated 31/05/2024 hence, appellant is entitled for seniority on the basis of age wise seniority. (Copy of seniority list is attached as Annex:"B")).

- 6. That the date of birth of appellant is 18/01/1981 while other employees SST IT teachers are junior in age from appellant therefore, appellant may please be kept senior than other SST IT teachers who are junior in age from appellant, date of birth of appellant as well as other SST IT teachers are duly mentioned in their seniority list.
- 7. That appellant is serving with respondent's department as a regular employee from the date of appointment and appellant is entitled for seniority from the date of initial appointment on the basis of regular employee as well as senior in age from other SST IT teachers who were appointed on the same date of appointment of appellant therefore, appellant is entitled to keep senior from other SST II Teachers who are junior in age from appellant and appointed on the same date of appointment of appellant as per seniority list of SST IT teachers. (Copy of Seniority list is already attached as Annex "B")
- 8. That appellant preferred an department appeal before respondent No.1 but in vain. (Copy of representation is hereby attached Annex; "C").
- 9. That appellant is entitled to keep senior in the seniority list of SST IT teachers on the basis of senior in age from other SST IT teachers on the following grounds.

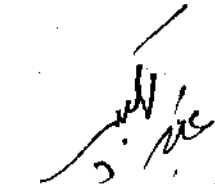
GROUND:

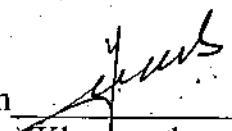
- A. That, appellant is senior in age from other SST IT teachers, therefore, appellant is entitled senior than other SST IT teachers in the seniority list of SST IT teachers maintained by respondents.
- B. That similarly placed official filed an appeal before the service Tribunal KPK Peshawar which was allowed vide order/ judgment dated 31/05/2023 and appellant was considered senior than other SST IT teachers on the basis of senior in age who were appointed on the same appointment order of appellant. (Copy of judgment is attached as Annex: "D").

- C. That, as per reported judgment of Apex Supreme Court of Pakistan (1996 SCMR 1185) appellant is entitled for the same relief which is granted to appellants in case appeal No. 2069/2019 titled Abid Noor Vs Director E & SE kpk Peshawar & others, in which, appellants were declared senior those in which those officials who are junior than appellant in age and appointed as SST teacher on the same date of appellant.
- D. That, respondents department have already issued order for correction of seniority list of appellant vide order dated 20/05/2024 and 26/06/2024. (Copies of orders are attached as Annex: "E")
- E. That appellant is entitled to keep senior than other SST IT teacher from those SST IT teacher who are junior in age from appellant and appointment on the same appointment order of appellant.

It is, therefore, humbly prayed that on acceptance of this appeal, appellant may please be declared senior than those SST IT teachers who are junior in age than appellant and who were appointed on the same date of appointment of appellant on the basis of judgment passed by this Hon'able Tribunal vide order / judgment dated 31/05/2023 and notification dated 26/06/2024 and 20/05/2024. Any other relief deemed fit may also be graciously awarded.

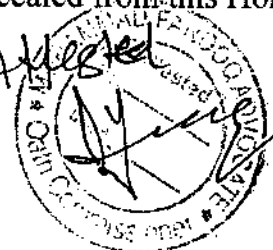

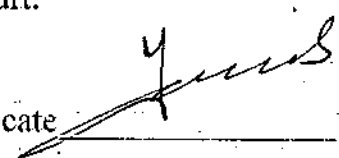
Dated 5/8/2024

Appellant 

Through 
 Yaqoob Khan advocate High courts at Distt: courts Mardan.

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that all the contents of the appeal mentioned above are true and correct to the best of my knowledge and belief and noting has been concealed from this Hon'able court.

  Advocate 

Aux A
4

Appointment Order of Male IT Teachers (BPS-16)



Establishment of 500 IT Labs in Government High & Higher Secondary Schools
in Khyber Pakhtunkhwa Project

Elementary & Secondary Education Department

Government of Khyber Pakhtunkhwa

Block "A", Opposite MPA's Hostel, Civil Secretariat Peshawar.

Dated Peshawar the December 16, 2016

ORDER:

No.PM-IT/E&SE/1-3/500-IT-Labs/Reectt/IT-Male/2016. Consequent upon recommendations of Departmental Selection Committee, the following One Hundred and Three (103) Male Candidates are hereby appointed as IT Teachers (BPS-16) on fixed pay (Rs. 40,000/- per month) under the Project "150559-Establishment of 500 IT Labs in Government High & Higher Secondary Schools in Khyber Pakhtunkhwa", on temporary basis, purely on contract, up to 30-06-2017 or till the completion of the project whichever is earlier, with immediate effect on the terms and conditions given at the end.

2. Upon their appointment as IT Teachers, they are posted against the vacant posts under the Project "150559-Establishment of 500 IT Labs in Government High & Higher Secondary Schools in Khyber Pakhtunkhwa" in the Schools noted against their names:-

S#	Name	Father Name	Domicile	NIC#	Contact Address	Name of School where Posted
1	NASIR ALI JADOON	ALI ASGHAR KHAN	ABBOTTABAD	13101-5646942-3	ASGHAR STREET MARI ROAD, POST OFFICE MANDIAN, ABBOTTABAD	GHS Sherwan, Abbottabad
2	AMMAN WAHEED	ABDUL WAHEED MUGHAL	ABBOTTABAD	13101-7454451-1	GT ROAD MOHALLAH MADNI VILLAGE, ABBOTTABAD	GHS Muslim Abad, Abbottabad
3	MUHAMMAD USMAN	MUHAMMAD AJAIB	ABBOTTABAD	13101-0188596-9	TANOLI HOUSE MALIK WAHEED STREET NEAR UMER FAROOQ MASQUE KHOLA ABBOTTABAD	GHS No. 3 Abbottabad
4	ADEEL AHMED	RASHID AHMED	ABBOTTABAD	13101-0810604-2	HOUSE NO CB 132 IQBAL ROAD NEAR SETHI MASJID ABBOTTABAD	GHS Khaira Gali, Abbottabad
5	SHAMS UR REHMAN	ABDUL SHAKOOR	ABBOTTABAD	13101-8573715-3	MISAR AHMED LDC STATION HEADQUARTERS ABBOTTABAD	GHS Malsa, Abbottabad
6	SAJID ULLAH KHAN	RAHIM ULLAH JAN	BANNU	11101-0390070-1	HOUSE NO 54 BLOCK NO K, 1 VALANCIA TOWN RAWIND ROAD LAHORE	GHS Katki, Bannu
7	AHMAD FARAZ KHAN	SAR FARAZ KHAN	BANNU	11101-1471803-1	AHMAD FARAZ KHAN CARE OF SUDAD KHAN UMS DELIVERY AGENT GPO BANNU CANTT	GHS Mandan, Bannu
8	KHURSHID FAROOQ	FAROOQ DAD KHAN	BANNU	11101-8778253-3	VILLAGE AMANDI SHAH JAHAN POST OFFICE MANDI SHEIKH AMIR BANNU	GHS Jani Khel, Bannu
9	MUHAMMAD LUQMAN KHAN	BAHADER NAWAZ	BANNU	11101-1746270-1	SHER JEHAN PETGATION DEPI FATA SECRAHATE WARAK ROAD PESHAWAR	GHS Kolka Muhammad Khan, Bannu
10	SAAD ULLAH KHAN	SHAH JEHAN	BANNU	11101-8390493-1	C/O MAHI ULLAH KHAN POSTMAN IN BANNU GPO BANNU	GHS Sikandar Khel Bala, Bannu
11	ZAID MUHAMMAD	MUHAMMAD NAZIR	BATTAGRAM	13202-3928463-3	CIC OFFICE NATIONAL BANK OF PAKISTAN CIRCULAR ROAD, ABBOTTABAD	GHS No. 2 Battagram
12	NASEER AHMED	SHER DAD	BATTAGRAM	13202-2207398-7	C/O AWAIS ELECTRONICS & UPS NEAR THAIR HOTEL TEHSIL AND DISTRICT MAIN BAZAR BATTAGRAM	GHS Chappargram, Battagram
13	RASHID AYAZ	MUHAMMAD AYAZ	BATTAGRAM	13202-6905785-1	VILLAGE AND POST OFFICE CHAPPARGRAM BATTAGRAM	GHS Bilandkot, Battagram
14	MUHAMMAD SADIQ	KHAIR UL BASHAR	BUNER	15101-6355729-5	VILLAGE KARAPA, TEHSEEL AND POST OFFICE, DAGGAR, DISTRICT BUNER	GHS Kawga, Buner
15	MUHAMMAD IQBAL	SULTANZEB	BUNER	15101-3315834-1	VILLAGE NAWAKALAY POST OFFICE TEHSIL DAGGAR DISTRICT BUNER	GHS Matwanai, Buner
16	IHTISHAM UL HAQ	SHAMS UL HAQ	BUNER	15101-1731999-9	VILLAGE GIRARI POST OFFICE JOWAR TEHSIL DAGGAR DISTRICT BUNER	GHS Etai, Buner
17	RAFI ALAM	BAKHT BAZ	CHARSADDA	17101-0336835-5	KHYBER MODEL SCHOOL AND COLLEGE RAHMAN ROAD NOWSHERA CANTT	GHS Babra, Charsadda
18	JUNAID KHAN	MOHAMMAD ILYAS	CHARSADDA	17101-9045215-3	CHIEF CONSERATOR OF FOREST HEAD OFFICE SHANI ROAD PESHAWAR	GHS Charsadda Khass, Charsadda
19	ASAD SHAH	PAINDA GUL	CHARSADDA	17102-1436708-1	VILLAGE SABANDI POST OFFICE MANDAN TEHSIL TANGI DISTRICT CHARSADDA	GCMS Turngzai (Shaheed Nangyal Tariq C.M.H.School), Charsadda
20	AMEER JAMAL SHAH	MUBARAK SHAH	CHARSADDA	17301-8826356-7	AFGHAN COLONY STREET NUMBER 18 NEAR SPEEN MASJID RING ROAD PATANG CHOWK POST OFFICE ASHRAFIA COLONY PESHAWAR	GHS Ganji Hamid Gtr Charsadda
21	IBAD ULLAH	FARMAN ULLAH	CHARSADDA	17101-5036433-9	HOUSE NUMBER 339, STREET NUMBER 10, F-7, PHASE 8, HAYATABAD PESHAWAR.	GHS Gul Abad Tangi, Charsadda

5

Appointment Order of Male IT Teachers (BPS-16)

S#	Name	Father Name	Domicile	NIC#	Contact Address	Name of School where Posted
22	NAVID AZIZ	KHAIR ULLAH KHAN	CHITRAL	15201-0417099-1	STEPNEX SERVICES PVT LIMITED FF 51 DEANS TRADE CENTER PESHAWAR	GCMHS Chitral for Boys, Chitral
23	MUHAMMAD YOUSAF	MIR AKBAR HUSSAIN	CHITRAL	15202-1236841-9	POST OFFICE DRASUR MULKHORO TEHSIL MUKHOW DISTRICT CHITRAL	GHS Booni, Chitral
24	NAZIR AHMAD	SHER ABDULLAH	CHITRAL	15201-5108810-3	PAK METEOROLOGICAL DEPARTMENT BALACH BALACH CHITRAL	GHS Ayun, Chitral
25	MUHAMMAD ARIF ARBAB	MUHAMMAD MASEEH UL MULK	CHITRAL	15201-1579921-5	HOUSE NO 165 PROFESSOR'S COLONY NEAR THE UNIVERSITY OF AGRICULTURE PESHAWAR	GHS Susoom, Chitral
26	MUHAMMAD FAYAZ	KHALID KHAN	CHITRAL	15201-5096978-9	VILLAGE GSIK POST OFFICE DROSH TEHSIL AND DISTRICT CHITRAL	GHS Ashirato, Chitral
27	TASSAWAR HUSSAIN	SYED MUNAWAR HUSSAIN	D.I.KHAN	12102-8465484-9	AHMED KABIR SHAH OFF BOYS PUBLIC SCHOOL NEAR ASHYANA SHOPPING CENTER DERA ISMAIL KHAN	GHS Potah, D.I.Khan
28	ZAHID AKHTAR	RAB NAWAZ	D.I.KHAN	12101-3682671-3	MAJOKA HOUSE MOHALLAH KHAKWAM TAREEN COLONY DERA ISMAIL KHAN	GHS Naivela, D.I.Khan
29	MUHAMMAD ADNAN FAROOQ	ASMAT ULLAH FAROOQ	D.I.KHAN	12101-9496577-3	HOUSE NUMBER 88 B, OPPOSITE WENSAM COLLEGE, USTRANA SOUTH, DERA ISMAIL KHAN	GHS Himmat, D.I.Khan
30	MUHAMMAD ASIF ALI	ABDUL MUNIR KHAN	D.I.KHAN	12101-8425192-9	HOUSE NO 103 B STREET 5 SECTOR K2 PHASE 3 HAYATABAD PESHAWAR	GHS Kiri Khesor, D.I.Khan
31	ASIM SHAHZAD	ALLAH DAD	D.I.KHAN	12101-4235581-1	BASTI USTRANA SOUTH OPPOSITE WENSAM COLLEGE DERA ISMAIL KHAN	GHS Rangpur Shumali, D.I.Khan
32	SALAHUDDIN	SHAH JEHAN	D.I.KHAN	12104-3898802-3	MOHALLA MARDANZAI VILLAGE AND POST OFFICE CHAUDHWAN DERA ISMAIL KHAN	GHS Musa Zai Sharif, D.I.Khan
33	SHEHZAD AHMAD	SHAHAB UD DIN KHAN	DIR LOWER	15302-2470027-3	VILLAGE AND POST OFFICE THRAI TEHSIL TIMERGARA LOWER DIR	GHS Shago Kass, Dir Lower
34	GAUJAR ALI	NOOR UL HAQ	DIR LOWER	15302-0872512-3	HOUSE NUMBER, 607 STREET NUMBER, 22 SECTOR F 10 PHASE 6 HAYATABAD PESHAWAR	GHS Toomang, Dir Lower
35	SHER YAR	DOST MUHAMMAD KHAN	DIR LOWER	15302-9642986-1	VILLAGE ANF POST OFFICE SHAWA TEHSIL ADENZAI DISTRICT LOWER DIR	GHS Shawa, Dir Lower
36	MUHAMMAD HASSAN	MUHAMMAD RSOOL KHAN	DIR LOWER	15306-4944191-9	DIR TRAVEL CENTER NOOR MARKET TIMERGARA LOWER DIR	GHS Haji Abad, Dir Lower
37	SHAH NAZAR KHAN	SHAH ZAMAN KHAN	DIR LOWER	15303-5993289-9	VILLAGE MAYAR POST OFFICE MAYAR JANDOOOL TEHSEEL SMAR BAGH DISTRICT LOWER DIR	GHS Chinar Kot, Dir Lower
38	ISRAR UDDIN	MISBAH UDDIN	DIR LOWER	15304-5022898-1	VILLAGE DANOOO SHAH POST OFFICE AND TEHSIL MUNDA LOWER DIR	GHS Khazana, Dir Lower
39	MAZHAR UL HAQ	NAZIR MUHAMMAD	DIR LOWER	15302-9353415-3	VILLAGE AND POST OFFICE TAKORO TEHSIL MUNDA DISTRICT DIR LOWER	GHS Kambal, Dir Lower
40	ABID ULLAH	SAHIB UR RAHMAN	DIR UPPER	15701-3613477-3	VILLAGE SHAW DISTRICT UPPER DIR TEHSIL UPPER DIR	GHS Darwa, Dir Upper
41	AFTAB UDDIN	BILAND IQBAL	DIR UPPER	15701-8467718-9	KHYBER INSTITUTE OF PROFESSIONAL STUDIES K BALAMBAT LOWER DIR	GHS Samkool, Dir Upper
42	QUDRAT REHMAN	GULABAT KHAN	HANGU	14101-0771854-9	CO SADAF MODEL SCHOOL DARSAMAND HANGU POST OFFICE MAMQON BANDA, TEHSEEL AND DISTRICT HANGU	GCMHS Hangu
43	ABID ALI	MEHBOOB UR REHMAN	HARIPUR	13302-7510330-3	ABID ALI SON OF MEBOOB UR REHMAN MOHALAH TUBE WELL VILLAGE MAUKYAR POST OFFICE HARIPUR	GHS Serai Nehmat Khan, Haripur
44	ADNAN BASHIR	BASHIR AHMED	HARIPUR	13302-1020842-5	TIP HOUSING SCHEME ROAD # 06 HOUSE NO 252/S HARIPUR	GHS Kholan Bala, Haripur
45	MUHAMMAD NADEEM	MUHAMMAD BANARAS	HARIPUR	13302-2897141-9	AYUB KARYANA STORE PHASE 05 NEAR ECO PACK PVT LIMITED INDUSTRIAL ESTATE HATTAR, HARIPUR	GHS Kangra Colony, Haripur
46	NAVEED AHMED	MIR ALAM	HARIPUR	13302-7906699-5	VILLAGE GEHRION PO KOT NAJEEN ULLAH, HARIPUR	GHS Ghazi Hamlet, Haripur
47	MEHTAB HABIB KHAN	NADIR KHAN	HARIPUR	13302-0447658-7	HOUSE # 04 SECTOR # 01 KHALABAT TOWN SHIP TEHSIL & DISTRICT HARIPUR	GCMHS T.T. Ship, Haripur
48	MISBAH ULLAH	WALI DAD KHAN	KARAK	14203-2064378-5	VILLAGE LAGHARI BANDA POST OFFICE MAUZINI BANDA TEHSIL T NERATI DISTRICT KARAK	GHS Lalumber, Karak
49	ARFAQ AHMAD	LAL SATTAR	KARAK	14203-2273132-3	VILLAGE SHAH QAISER BANDA POST OFFICE BOGARATEHSIL TAKHT E BASRATI, KARAK	GHS Zarki Nasrati, Karak
50	TARIQ FIAZ KHAN KHATTAK	PESHAWAR KHAN	KARAK	14203-4224101-3	TARIQ FIAZ HAJI BASHIR HOUSE NO 191 ZAWAKI BANDA HANGU ROAD KOHAT	GCMHS Chokara, Karak
51	MAHMOOD REHMAN	MUHAMMAD REHMAN	KARAK	14203-1578483-7	VILLAGE AND POST OFFICE CHOKDARA TEHSIL TAKHTI NASRATI DISTRICT KARAK	GHS Mitha Khel, Karak
52	MUHAMMAD AAMIR	MUHAMMAD ISHAQ	KOHAT	14301-6097806-5	DAWOOD FLATS FLAT NO 1 NEAR DCO OFFICE 92 THE MALL ROAD NOWSHERA	GHS Nandarka, Kohat
53	MUHAMMAD NAVEED	MUHAMMAD USMAN	KOHAT	17301-8687958-3	HOUSE NUMBER 195 SECTOR NUMBER 7 PHASE NUMBER 1 KDA KOHAT	GHS No. 2 Kohat
54	ASIF IQBAL	IQBAL SHAH	KOHAT	14301-9783949-5	FAMU FOUNDATION HIGHER SECONDARY SCHOOL LACBI KOHAT	GCHS Kohat
55	FAHIM ALI SHAH	SYED MANSOOR ALI SHAH	KOHAT	14301-8444081-1	VILLAGE JOOMA TEHSIL AND DISTRICT KOHAT	GHS Pershai, Kohat

16

Appointment Order of Male IT Teachers (BPS-16)

Sr	Name	Father Name	Domicile	NIC#	Contact Address	Name of School where Posted
56	MUHAMMAD ARIF	MUHAMMAD SIRAJ	KOHISTAN	13303-2232770-3	SIRAJ GENERAL STORE SHINGARI ROAD NEAR TRAFFIC POLICE CHOKI BUT PULL MANSEHRA	GHS Jilal, Kohistan
57	ALAM ZEB	MAGAR SHAH	KOHISTAN	13401-8028784-1	ZEB GENERAL STORE MIAN KOMLA BAZZAR TESHIL AND DISTRICT KOHISTAN	GHS Seo, Kohistan
58	MUHAMMAD NABI	NAQAL SHAH	KOHISTAN	13401-8440872-1	ZEB GENERAL STORE MIAN KOMLA BAZZAR TESHIL AND DISTRICT KOHISTAN	GHS Shafiq, Kohistan
59	AMAN ULLAH KHAN	SAEED KHAN	LAKKI MARWAT	11201-0384934-5	DISTRICT AND TESHIL LAKKI MARWAT VILLAGE AND POST OFFICE TAJORB MOHALLAH DOHARA KHIL LAKKI MARWAT	GHS Ghazni Khel, Lakki Marwat
60	TAHIR MAHMOOD	GUL RAHMAN	LAKKI MARWAT	11201-8824088-8	HOUSE NO 388 STREET NO 58 G 10-4 ISLAMABAD	GHS Dello Khel, Lakki Marwat
61	MUHAMMAD ARIF	MUHAMMAD AMIN	LAKKI MARWAT	11201-1236223-1	CO MUHAMMAD AYZ DINI SHOP NEAR HAMB BANK LIMITED	GHS Mela Mandra Khel, Lakki Marwat
62	SYED YUNAS ALI SHAH	SYED WILAYAT SHAH	LAKKI MARWAT	11201-8038043-3	BERAI GAMBLA LAKKI MARWAT KP	GHS Shahi Ouli Khel, Lakki Marwat
63	FAZAL AMIN	USMAN GHANI	MALAKAND	15402-8033482-5	VILLAGE KAMA AGRA POST OFFICE AGRA DISTRICT MALAKAND	GHS No.1 Dharl Akhand, Malakand
64	AURANG ZEB	MUHAMMAD ZEB	MALAKAND	15402-8008107-6	FDI MEDICINE SHAHEEN STREET, MOHALLAH GUL BAHAR BATIKHELA MALAKAND	GHS No.2 Baskhela, Malakand
65	HAZRAT KHAN	HABIB UR RAHMAN	MALAKAND	15401-4097173-1	VILLAGE BORAN KHAMAR TANGAI BANDA POST OFFICE DARGAI MALAKAND	GHS No.1 Sphelot, Malakand
66	MUHAMMAD SHOUKAT	NOOR MUHAMMAD	MANSEHRA	13503-0580788-5	FAZAL UR REHMAN KARYANA STORE PAKHWAL ROAD DAB NO 02 MANSEHRA	GHS Mohandarl, Mansehra
67	UMER FAROOQ	ABOUL GAYYUM	MANSEHRA	13503-0368306-5	CO HAMAYUN MEDICAL HALL NEAR CH BATIAL POST OFFICE BATTAL DIT MANSEHRA	GHS Kolka, Mansehra
68	SAJID SALEEM KHAN	MUHAMMAD SALEEM KHAN	MANSEHRA	13503-8081718-7	VILLAGE AND POST OFFICE TANDA TESHIL AND DISTRICT MANSEHRA	GHS Talaha, Mansehra
69	MUHAMMAD EJAZ	MUHAMMAD AFSAR	MANSEHRA	13503-0086380-3	CHINAR ARJY PUBLIC SCHOOL AND COLLEGE MURREE	GHS Chita Bala, Mansehra
70	MUHAMMAD ISRAR	MUHAMMAD NASEEM KHAN	MANSEHRA	13503-7871068-7	VILLAGE AND POST OFFICE SAMIR SHAH TESHIL AND DISTRICT MANSEHRA	GHS Trangri Bala, Mansehra
71	UMER WAHEED	ABDUL WAHEED	MANSEHRA	13503-0848358-8	THE MUSUM EDUCATION SYSTEM MANSEHRA	GHS Garwal, Mansehra
72	SAYED WIGAR ALI SHAH	SAYED JOHAR ALI SHAH	MARDAN	16101-1218301-3	RUSTAM ENGINEERING WORKS VILLAGE AND POST OFFICE RUSTAM DISTRICT MARDAN	GHS Sharq Hol, Mardan
73	MUHAMMAD AFSAR KHAN	MUHAMMAD AYUB KHAN	MARDAN	16102-0029704-8	MOH MADANI MASJID NAWAN KILLI VILLAGE V POST OFFICE GUJAR GARH MARDAN	GHS Bickat Garj No.1, Mardan
74	AFTAB UD DIN	BAKHT JAMR	MARDAN	16102-2388373-3	DR ZIA UD DIN DEPT OF HUMAN NUTRITION THE AGRICULTURE UNIVERSITY PESHAWAR	GHS Talhi Bhal, Mardan
75	AFTAB AHMAD	MEHTAJ	MARDAN	16101-7834020-5	MUHAMMAD ISHAD DIVISIONAL FOREST OFFICER WILDLIFE NAWA KALI DISTRICT MARDAN	GHS Bala Garhi, Mardan
76	MUHAMMAD IBRAHIM	FAZLI WALI	MARDAN	16101-8088002-1	MOHALLAH MASJID BERA VILLAGE GARH DALUKAT ZAI POST OFFICE GARH KAPURA MARDAN	GHS Gujrat, Mardan
77	MIAN KHURAM SHAHZAD	MIAN MUHAMMAD HUSSAIN	NOWSHERA	17301-8325734-9	STREET MIAN KHALE CITY AND TESHIL, PABBI 24210 NOWSHERA	GHS Ab Baq, Nowshera
78	DAZI HAMAYUN	PERVEZ AHMAD QAZI	NOWSHERA	17201-2752878-5	HOUSE NO 1075 MOHALLAH DHONI LANE NEAR JAMRA MASJID REBALPUR NOWSHERA	GHS Pir Sabeq, Nowshera
79	MUHAMMAD AMJAD	AZZ KHAN	NOWSHERA	17201-3113350-1	VIRTUAL UNIVERSITY CAMPUS PESHAWAR POST OFFICE TEXAL BALA TESHIL, PESHAWAR DISTRICT PESHAWAR	GHS Kheshgi Bala, Nowshera
80	YASIR HAMID	KHIAL ZADIN	NOWSHERA	17201-2181561-7	POST OFFICE NZAMPUR MOHALLAH SHAMSABAD TESHIL AND DISTRICT NOWSHERA	GHS Khaleer, Nowshera
81	WAQAS AHMAD	SHAMS UR REHMAN	PESHAWAR	17301-0354834-3	EBM SHOP NO 20 GROUND FLOOR GUL HAJI PLAZA UNIVERSITY ROAD PESHAWAR	GHS PAF Shaheen Camp, Peshawar
82	IFTIKHAR AHMAD	MUKHTIAR GUL	PESHAWAR	17301-7365432-7	BAR LUB NEHR CHARSADGA ROAD STREET NUMBER 07 MOHALLAH MADINA COLONY RASHID ABAD NUMBER 02 PESHAWAR	GHS Civil Quarter, Peshawar
83	MEHMOOD IRSHAD KHAN AFRIDI	YAR MUHAMMAD KHAN AFRIDI	PESHAWAR	17301-2880498-1	MIERA KACHORI POST OFFICER GHARI NOBAT KHAN KHATAKUPUR GHARI NOOR MUHAMMAD KHAN PESHAWAR	GHS Aza Khel, Peshawar
84	AQEEL AHMAD	ZAHID JAN	PESHAWAR	17301-8238853-7	CARE OF BHEE PALACE GENT BOX SYED JAMAL UD DIN AFGHAM LINE UNIVERSITY TOWN PESHAWAR	GHS Nooh Pryan, Peshawar
85	ATTA ULLAH	AMIR SHAHEED	PESHAWAR	17301-8081551-1	KDHATIAN NO 2 CHAMKANI PESHAWAR	GHS Mian Gajar, Peshawar
86	MUHAMMAD NAJAM US SAQIB	MUHAMMAD SALEH	PESHAWAR	17301-7113334-7	VILLAGE PATWAR BALA WARSAK ROAD POST OFFICE MATHRA TESHIL AND DISTRICT PESHAWAR	GHS No. 3 Peshawar Cantt

7

Appointment Order of Male IT Teachers (BPS-16)

S#	Name	Father Name	Domicile	NIC#	Contact Address	Name of School where Posted
87	SABZ ALI KHAN	LAJBAR KHAN	SHANGLA	15802-786301-1	VILLAGE NACHAR POST OFFICE KOTKAY ALPURA SHANGLA	GHS Kotkay, Shangla
88	ABID HUSSAIN	MUHAMMAD RASHAD	SHANGLA	15501-2763429-7	VILLAGE AND POST OFFICE CHAKERRAR TEHSIL ALPURA DISTRICT SHANGLA	GHS Chakesar, Shangla
89	SADAM HUSSAIN	SULIMAN	SHANGLA	15501-8678500-3	POST OFFICE SHAH PUR BARKANA TEHSIL ALPURA DISTRICT SHANGLA	GHS Dehrui Alpurai, Shangla
90	SULJAD ALI	RAZ MUHAMMAD	SWABI	16202-1105513-3	FLAT NUMBER 12 PARK PLAZA BEHIND POST OFFICE SECTOR G-8 MARKAZ ISLAMABAD	GHS Shawa, Swabi
91	MUHAMMAD JUNAID KHAN	MUHAMMAD RAZIQ KHAN	SWABI	16201-7653611-3	MOHALLAH SASINI VILLAGE AND POST OFFICE TRADER TEHSIL LAHOR DISTRICT SWABI	GHS No.1 Tordar, Swabi
92	MUHAMMAD ABBAS	SAEED UR REHMAN	SWABI	16201-2426188-6	VILLAGE AND POST OFFICE BOX , KHANDA , MOHALLAH BUDDI KHAIL , TEHSIL LAHOR , DISTRICT SWABI	GHS Zaida, Swabi
93	SHABIR AHMAD	QAMAR GUL	SWABI	16202-770688-8	MOH , AHMAD KHIL VILLAGE AND POST OFFICE SHAWA , TEHSIL RAZAR , DISTRICT SWABI	GHS Turand, Swabi
94	MUHAMMAD FAHEEM UDDIN FAROOQI	SHAHNOSH FAROOQI	SWABI	16202-0842418-8	CARE OF MUHAMMAD PARVAZ ASSISTANT PROF GPGC SWABI	GHS Swabi
95	RIAZ MUHAMMAD KHAN	MASAL KHAN	SWABI	16202-8484005-3	RIAZ OO FAZLE HADI DILDAR PLAZA BASEMENT SHOP NUMBER 03 SWABI AL HAFIZ COMMUNICATION SWABI	GHS Depal, Swabi
96	IKRAM ALI	BAJOIT BILAND	SWAT	15801-6695987-7	MOHALLAH BARPALOW VILLAGE SUMBAT POST OFFICE AND TEHSIL MATTIA DISTRICT SWAT	GHS Gulbagh, Swat
97	ARSHAD	AMIR ZADA	SWAT	15802-8482941-5	SADIQ SHOES MANGLOR BAZAR, POST OFFICE MANGLOR TEHSIL BAROZAI DISTRICT SWAT	GHS Sarsenal, Swat
98	SKANDAR ALI	MIAN SYED KARAM	SWAT	15802-7203636-8	SWAT PUBLIC LIBRARY SAIDA SHARIF SWAT NEAR DIST COURT SWAT	GHS Ahingaro Dherai, Swat
99	ABOUL KABIR	AHMAD KHAN	SWAT	15801-4649887-3	CHIKALA BARA DURUSH KHELA TEHSIL MATTIA SWAT	GHS Durash Khela, Swat
100	HABIB UR RAHMAN	WAHID ZAMAN	SWAT	15801-1020337-7	VILLAGE BAZ KHELA PIO DURUSHKHELA TEHSIL MATTIA SWAT	GHS Chitarwar, Swat
101	MUSLIM KHAN	JEHAN ZEB KHAN	SWAT	15801-1270888-1	C/O IBRAHIM DISTRICT OFFICE OF THE LIVESTOCK SAIDU SHARIF SWAT	GHS Khazana, Swat
102	MUHAMMAD RAIS KHAN	MISAL KHAN	TANK	12201-1457505-1	ROOM NUMBER, B4 8TH MAIN CAMPUS GONAL UNIVERSITY DERA ISMAIL KHAN	GHS No. 2 Tank
103	MUHAMMAD UZAIR	MISAL KHAN	TANK	12101-4981887-8	ROOM NO 15-A FIRST FLOOR BUSINESS CENTER CRICKET STADIUM ROAD RAWALPINDI	GHS Tajori, Tank

TERMS AND CONDITIONS:

1. Their appointment is purely on contract basis extendable at the maximum up to the project life subject to satisfactory performance of the appointees 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. 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. Their services will be liable to termination without any notice if their academic documents and other credentials submitted in this office are found fake at any stage and they will be proceeded against under the law.
5. They will produce a medical certificate of fitness from the concerned Civil Surgeon/Medical Superintendent.
6. They will be governed by Provincial Government Rules concerning project contract appointments as amended from time to time.
7. 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.
8. The District Education Officer (Male) concerned will release their pay after verification of their academic documents.
9. Their appointments are School based and non-transferable.

[Handwritten Signature]

18

Appointment Order of Male IT Teachers (BPS-16)

10. Their joining time of this offer is 30 days and they will have to sign a contract agreement with the concerned District Education Officer (Male) on behalf of the IT Project E&SE Department, failing which, the offer will stand cancelled. The signed contract agreement will be submitted to the IT Project, E&SE Department.
11. They will submit Charge Report to all the concerned.
12. No TA/DA will be allowed to the appointees for joining their duties.

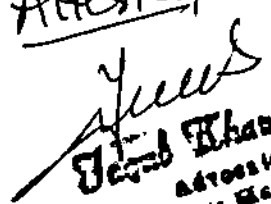
PROJECT MANAGER IT

**"150559-ESTABLISHMENT OF 500 IT LABS IN GOVERNMENT HIGH
& HIGHER SECONDARY SCHOOLS IN 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 Masters of the Schools Concerned.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PS to Special Secretary (Development), E&SE Department, Khyber Pakhtunkhwa.
8. PA to Chief Planning Officer, E&SE Department, Khyber Pakhtunkhwa.
9. Official concerned.


(SALAMUDDIN)
PROJECT MANAGER IT

Attested

Javed Khan
Assistant
Chief Officer



PAKISTAN

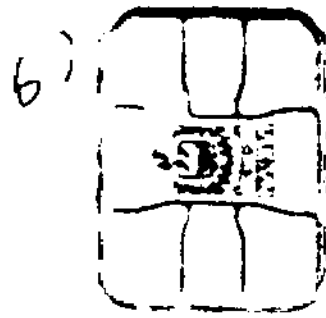
ISLAMIC REPUBLIC OF PAKISTAN

National Identity Card



Name
Abdul Kabir

Abdul Kabir



جبرائیل

Father Name
Ahmad Khan

احمد خان



احمد خان

Gender Country of Stay

M Pakistan

Date of Birth

18.01.1981

Identity Number

15601-4649667-3

Date of Issue

12.10.2023

150303

Date of Expiry

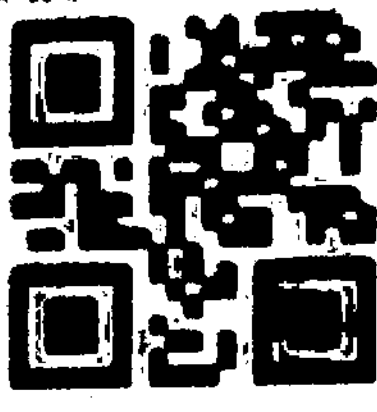
12.10.2033

Holder's Signature

موجود ہے: پینال، ڈاک خانہ برہہ در شہید برہہ در شی خیل،

15681-46096

تعمیراتی مہم کا طبع سوانہ



11512861
11691339

محل ہے: پینال، ڈاک خانہ برہہ در شہید برہہ در شی خیل،

تعمیراتی مہم کا طبع سوانہ

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

(10)

5740 = 50
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 // = 232

Seniority List 2024

Abdul Kabir VS Education

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 12/03/2024

S.No	CNIC	Name	FatherName	Qualification	Domicile	B.Ed Declaration	School/Institute/Office	DateOfBirth	Merit Score	Date of Entry into Edu:Deptt	Date of Apptt as SST (IT)	Advertisement No	Date of Regularization
1		Nisar Khan	Ismail Khan	M.Sc	KHYBER		GHS Pindi Lalma	20/11/1983		6/14/2005	14/06/2005		
2	12201-1380433-7	Sami Ullah	Moin Khan	B.Sc B.Ed	SOUTH WAZIRISTAN	2015	GHS Spinkai	31/03/1983		6/14/2005	14/06/2005		
3	11101-8235769-3	Abid Nawaz Khan	Rekhan Nawaz Khan	M.Sc B.Ed	FR BANNU		GHS Dilwar Khan SDW Bannu	12/10/1986		9/2/2008	02/09/2008		
4	21103-8831093-9	PARVEZ KHAN	SHARIF KHAN	B.SC ,B.Ed	BAJAUR	2017	GHS INAYAT KILLI BAJAUR	15/11/1981		2/9/2008	09/02/2008		
5	21506-4367387-5	Bashir Ahmad	Muhammad Yasin	B.Sc	NORTH WAZIRISTAN		GHS Miranshah	03/01/1987		2/9/2008	09/02/2008		
6		Fayaz Ahmad	Muhammad Yaqoob Khan	B.Sc	Mohmand		GHS Danish Kool	16/04/1989		2/9/2008	09/02/2008		
7	16202-0898172-9	Sohail Irfan	Muhammad Ayub	B.Sc.MCS ,B.Ed	Pwabi	2022	GHS Gandaf	24/08/1973		7/1/2007	01/07/2007		
8	13533-3539674-9	ZAKIR KHAN	MUHAMMAD YOUSAF	MS COMP SC / MED	MANSEHRA	2017	GHS SHAMDARA Oghi MANSEHRA	03/09/1987	87.00	9/12/2014	12/09/2014	INF(P)836	
9	15702-5904046-1	KHUSH DIL	ASFANDYAR	M.Phil (CS) ,B.Ed	DIR UPPER	2022	GHS GHANDIGAR	01/05/1986	85.00	9/12/2014	12/09/2014	INF(P)836	
10	13503-5902512-7	MAJID KHAN	BEHRAM KHAN	BSc(CS) /BED	MANSEHRA	2011	GHS BAIDRA MANSEHRA	13/02/1983	81.00	11/17/2014	17/11/2014	INF(P)836	
11	15101-0134774-7	FAZLI RABI	FAZAL RAZIQ	MS CS , M.Ed	BUNER	2016	GHS DAGAI	20/03/1988	79.00	9/12/2014	12/09/2014	INF(P)836	
12	15602-0252416-3	NAMAT ULLAH	SAEED ULLAH	BS TELECOMMUNICATION	KOHISTAN		GHS PATTAN KOHISTAN LOWER	13/04/1988	74.00	11/17/2014	17/11/2014	INF(P)836	
13	15302-9642986-1	SHER YAR	DOST MUHAMMAD KHAN	BS CE,B.Ed	DIR LOWER	2010	GHS Shawa	30/01/1988	81.20	12/16/2016	16/12/2016	PID(I)3018/75	

SST IT Final

11
 And B

Advertisement No. (13018/75)
 Date of Registration (13018/75)
 R/O

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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 Apptt as SST (IT)	Advertisement No	Date of Regularization
44	11101-9390493-1	SAAD ULLAH KHAN	SHAH JEHAN	BS SE	BANNU		GHS SIKANDER KHEL BALA SANNU	13/04/1989	77.60	12/16/2016	16/12/2016	PID(1)3018/75	
45	14203-4224101-3	TARIQ FIAZ KHAN KHATTAK	PESHAWAR KHAN	MCS MED	KARAK	2016	GHS MITHAKHEL KARAK	26/02/1982	77.30	12/16/2016	16/12/2016	PID(1)3018/75	
46	16202-8484005-3	RIAZ MUHAMMAD KHAN	MASAL KHAN	MS, BS COMP SC/	SWABI		GHS NO.1 DAGI SWABI	01/04/1984	77.20	12/16/2016	16/12/2016	PID(1)3018/75	
47	14203-1576483-7	MAHMOOD REHMAN	MUHAMMAD REHMAN	MCS BED	KARAK	10/09/201	GCMHS CHOKARA KARAK	27/07/1985	77.20	12/16/2016	16/12/2016	PID(1)3018/75	
48	16202-1449627-3	TARIQ AZAM	SHER AZAM	BS COMP SC/BED	SWABI	2018	GHS SWABI	29/04/1987	77.10	1/27/2017	27/01/2017	PID(1)3018/75	
49	15302-9353415-3	MAZHAR UL HAQ	NAZIR MUHAMMAD	BS CSE B.Ed	DIR LOWER	2020	GHSS Kambat	10/03/1991	77.00	12/16/2016	16/12/2016	PID(1)3018/75	
50	15601-4649667-3	ABDUL KABIR	AHMAD KHAN	BSCS MED.	SWAT	2016	GHS DURUSHKHELA	18/01/1981	76.80	12/16/2016	16/12/2016	PID(1)3018/75	
51	13101-5648942-3	NASIR ALI JADOON	ALI ASGHAR KHAN	BS(CS)	ABBOTTABAD		GHS JHANGI ABBOTTABAD	14/08/1988	76.70	12/16/2016	16/12/2016	PID(1)3018/75	
52	11201-1235623-1	MUHAMMAD ARIF	MUHAMMAD AMIN	MCS	LAKKI	2014	GHS MELA MANDRA KHEL	20/05/1990	76.70	12/16/2016	16/12/2016	PID(1)3018/75	
53	15302-7349196-1	SYED AFTAB MEHMOOD	SYED AZAM	MS CS .M.Ed.	DIR LOWER	2015	GCMHS Timergera	01/05/1989	76.60	1/27/2017	27/01/2017	PID(1)3018/75	
54	15601-1270868-1	MUSLIM KHAN	JEHAN ZEB KHAN	BS CS, MCS	SWAT		GHSS Sijbanr Matta Swat	02/04/1991	76.60	12/16/2016	16/12/2016	PID(1)3018/75	
55	13101-7454451-1	AMMAN WAHEED	ABDUL WAHEED MUGHAL	MCS.B.Ed	ABBOTTABAD	2022	GHSS MUSLIMABAD	21/01/1988	76.30	12/16/2016	16/12/2016	PID(1)3018/75	
56	14301-8444081-1	FAHIM ALI SHAH	SYED MANSOOR ALI SHAH	BSIT Hon, BED	KOHAT	2013	GHS PARSHAI KOHAT	27/12/1985	76.00	12/16/2016	16/12/2016	PID(1)3018/75	
57	14301-3625029-9	SYED TANZEEL SHAH	TANVEER HUSSAIN SHAH	BSCS Hon, B.Ed, M.Ed	KOHAT	2019	GHSS BILLITANG KOHAT	02/06/1986	76.00	1/27/2017	27/01/2017	PID(1)3018/75	
58	13101-8573715-3	SHAMS UR REHMAN	ABDUL SHAKOOR	BS(SOFT: ENGG) B.ED	ABBOTTABAD	2016	GHS MALSA	02/04/1986	75.60	12/16/2016	16/12/2016	PID(1)3018/75	

12

Approved
 Signature
 Address
 Date

Abdul Kabeer s/o Ahmed Khan SST IT teacher Duzesh Khela Swat
R/o vill: Duzesh Khela Mingora Swat.Appellant.

VS

1. Director of E & SE KPK, Peshawar.
2. District Education Office (M) Swat.Respondents.

Departmental appeal / Representation for grant of seniority on the basis age senior/ higher from other employees appointed on the same date of appellant.

Respected Sir,

Appellant Humbly submits as under

1. That appellant is posted as SST ~~IT~~ Teacher with respondent department and performed his duty regularly.
2. That appellant was passed test/ interview and qualified for the post of SST.
3. That respondent department has advertised the post of SST Teacher for which appellant was properly applied and qualified the test/ interview for the post of SST teacher.
4. That appellant was appointed as SST Teacher vide order dated **16/12/2016** (copy is attached)
5. That service of appellant is regularized from the date of 1st appointment.
6. That the seniority list of the appellant as well as other SST Teacher was drawn on the basis of the score obtained by them in the test conducted by national testing service (NTS) while as per law the seniority of appellant is of the view that seniority inter se was required to have been fixed age wise in view clause 8 of terms and conditions of regularization order as well as sub section 2 of section 4 of KPK employees of E & SE department (appointment and regularization of svc Act 2017 hence appellant is entitled for seniority on the basis of age wise seniority. (copy of seniority list is attached).
7. That the date of birth of appellant is 18-1-1981 while other employees ~~SST~~ Teachers are junior in age from appellant, therefore, appellant may please be kept senior than other SST who are junior in age from appellant and appointed on the same date of appellant.
8. That appellant is serving with respondent department as a regular employee from initial appointment and appellant is entitled for seniority from the date initial appointment on the basis of regular employee and also appellant is senior in age from the private respondents therefore, appellant is senior from private respondents.

(14)

9. That is senior in age than private respondent and entitled senior than private respondents in the seniority list of SST on the following grounds.

Grounds:

- A. That appellant is senior in age from private respondents, therefore, appellant is entitled senior than private respondents in the seniority list of SST teachers maintained by respondents.
- B. That similarly placed official filed an appeal before the service Tribunal KPK Peshawar which was allowed vide order/ judgment dated 31-05-2023 and appellant was considered senior on the basis of senior in age. (Copy of judgment is attached).
- C. That as per reported judgment of apex Supreme Court of Pakistan (1996 SCMR 1185) appellant is entitled for the same relief which is granted to appellants in case appeal No. 2069/2019 titled **Abid Noor Vs Director E & SE KPK Peshawar & others**, in which appellant were declared senior those in which those officials who are junior than appellant in age and appointed as SST Teacher on the same date of appellant.

It is therefore, humbly requested that on acceptance of this appeal, appellant may please be declared senior than those employees who are junior and who are appointed on the same date of appointment of appellant. Any other relief deemed fit may also be graciously awarded.

Dated: 29-4-2024

Your's obediently, Atabul

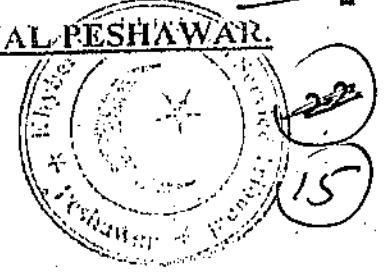
Through: Yaqub Khan
Yaqoob Khan Advocate
High Court

Attested

Yaqub Khan
Advocate,
Distt. Courts Peshawar

BENEFIT OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Ann D (3)
11



Service Appeal No. 2069/2019
Date of Institution ... 23.12.2019
Date of Decision... 31.05.2023

Abid Noor S/O Noor Nawaz Khan, R/O Kotka Mir Alam P/O Torka Surani,
Tehsil & District Bannu, Primary School Teacher (BS-12) GPS, Lalozai
Bannu. ... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 55 others. ... (Respondents)

Service Appeal No. 2070/2019
Date of Institution ... 23.12.2019
Date of Decision... 31.05.2023

Afsar Ali Khan S/O Haider Ali, R/O Kotka Gharib Abad P/O Bazar Ahmad
Khan Bannu, Tehsil & District Bannu, Primary School Teacher (BS-12) GPS,
No. 1 Bazar Ahmad Khan Bannu. ... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 65 others. ... (Respondents)

Service Appeal No. 2071/2019
Date of Institution ... 23.12.2019
Date of Decision... 31.05.2023

Shah Da Ullah Khan S/O Khubaz Khan, R/O Kotka Dilasa Khan near PS
Mandan P/O Bada Mir Abbas Khan Mandan Bannu Tehsil & District Bannu,
Primary School Teacher (BS-12) GPS, Bada Mir Abbas Bannu.
... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 61 others. ... (Respondents)

Service Appeal No. 2072/2019
Date of Institution ... 23.12.2019
Date of Decision... 31.05.2023

Muhammad Ahsan Ali Shah S/O Ghaffar Ali Shah, R/O Piran Tughal Khel
P/O Syed Tughal Khel Tehsil & District Bannu, Primary School Teacher

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(BPS-12) GPS, Mastā Mir Tughal Khel.

... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 53 others.

... (Respondents)

Service Appeal No. 2073/2019
Date of Institution... 23.12.2019
Date of Decision... 31.05.2023

Imtiaz Khan S/O Muhammad Noor, R/O Kaski Akhondan Mandew Kandidak
Tehsil & District Bannu, Primary School Teacher (BS-12) GPS, Mandew
Kandidak Bannu.

... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 108 others.

... (Respondents)

Service Appeal No. 2074/2019
Date of Institution... 23.12.2019
Date of Decision... 31.05.2023

Abdul Matin S/O Ghazi Marjan, R/O Kotka Sarwar Garhi Mir Alam Tehsil &
District Bannu, Primary School Teacher (BS-12) GPS, Sher Daraz Madan
Bannu.

... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 66 others.

... (Respondents)

Service Appeal No. 2075/2019
Date of Institution... 23.12.2019
Date of Decision... 31.05.2023

Syed Abad Mir Shah S/O Muhammad Mir Shah, R/O Village Manja Khel P/O
Taji Kala Tehsil & District Bannu, GPS Kot Azad Mughal Khel, Bannu.

... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 39 others.

... (Respondents)

Service Appeal No. 2076/2019
Date of Institution... 23.12.2019
Date of Decision... 31.05.2023

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Appeal Tribunal

Noor Muhammad Khan S/O Ali Bahadar Khan, R/O Kotka Mir Alam P/O
Torka Surani Khyber Pakhtunkhwa Bannu, Primary School Teacher (BS-12)
GPS, Torka Surani Bannu. ... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 41 others. ... (Respondents)

Service Appeal No. 2077/2019
Date of Institution ... 23.12.2019
Date of Decision ... 31.05.2023

Khazada Khan S/O Mahmood Khan, R/O Sardi Khel Gul Badin Kandi Dak
P.O Meryan Tehsil & District Bannu, Primary School Teacher (BS-12) GPS,
Shah Azim Landi Dak Bannu. ... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 130 others. ... (Respondents)

Service Appeal No. 2078/2019
Date of Institution ... 23.12.2019
Date of Decision ... 31.05.2023

Naseem Ullah S/O Rooh ul Amin Khan, R/O Khwaja Mad Mandan Tehsil &
District Bannu, Primary School Teacher (BS-12) GPS, Akhundani Khwajamad
Manda Bannu. ... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 126 others. ... (Respondents)

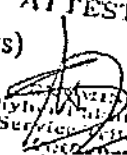
Service Appeal No. 2079/2019
Date of Institution ... 23.12.2019
Date of Decision ... 31.05.2023

Shahid Ullah Khan S/O Umar Nawaz Khan, R/O Malik Chowk PO Fathima
Khel District Bannu, Primary School Teacher (BS-12) GPS, Kot Adil Bannu.
... (Appellant)

VERSUS

Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa,
Near GHSS No. 1 Firdos, Peshawar and 278 others. ... (Respondents)

ATTESTED


Khyber Pakhtunkhwa
Service Appeal Tribunal

MR. INAYAT ULLAH KHAN,
Advocate

--- For appellants.

MR. ASIF MASOOD ALI SHAH,
Deputy District Attorney

--- For official respondents.

MR. SALAH-UD-DIN
MR. MUHAMMAD AKBAR KHAN

--- MEMBER (JUDICIAL)
--- MEMBER (EXECUTIVE)

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JUDGMENT:

SALAH-UD-DIN, MEMBER:- Through this single judgment we intend to dispose of the above titled Service Appeals as common questions of law and facts are involved in all the appeals.

2. Brief facts of Service Appeal No. 2069/2019 to Service Appeals No. 2074/2019 as well as Service Appeals No. 2077/2019 and 2078/2019 are that the appellants as well as private respondents therein were appointed as PSTs on contract basis vide Notification bearing endorsement No. 8313-8514/PST/adhoc/ dated: Bannu the 23.07.2014 DEO/(M). During course of their service, Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 was promulgated and in light of the same, their services were regularized vide Notification bearing Endorsement No. 2344-3253/AE-I/Estab dated 07.04.2018 with effect from the date of their initial appointment. The seniority list of the appellants as well as private respondents of the said appeals was drawn on the basis of the score obtained by them in the test conducted by National Testing Service (NTS). The

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Khyber Pakhtunkhwa
Secondary Education
Department

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appellants are of the view that their seniority inter-se was required to have been fixed age-wise in view of Clause-8 of terms and conditions of the regularization Notification dated 07.04.2018 as well as Sub-Section-2 of Section-4 of Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment and Regularization of Services) Act, 2017, therefore, they filed objection on the seniority list on 17.08.2019, however the same was not responded. The appellants there-after submitted departmental appeal on 26.08.2019 but the same was also not responded, constraining them to file appeals before this Tribunal for redressal of their grievance.

3. Precise facts of Service Appeals No. 2075/2019 and 2076/2019 are that the appellants as well as private respondents therein were appointed as PSTs on contract basis vide Notification bearing endorsement No. 1922-28/AE-1-Male/PST/Adhoc/Apptt: Dated Bannu the 28.03.2016. During course of their service, Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 was promulgated and in light of the same, their services were regularized vide Notification bearing Endorsement No. 2344-3253/AE-I/Estab dated 07.04.2018 with effect from the date of their initial appointment. The seniority list of the appellants as well as private respondents of the said appeals was drawn on the basis of the score obtained by them in the test conducted by National Testing Service (NTS). The

ATTESTED

[Signature]
Secretary
Services

appellants are of the view that their seniority inter-se was required to have been fixed age-wise in view of Clause-8 of terms and conditions of the regularization Notification dated 07.04.2018 as well as Sub-Section-2 of Section-4 of Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment and Regularization of Services) Act, 2017, therefore, they filed objection on the seniority list on 17.08.2019, however the same was not responded. The appellants there-after submitted departmental appeal on 26.08.2019 but the same was also not responded, constraining them to file appeals before this Tribunal for redressal of their grievance.

4. Brief facts of Service Appeal No. 2079/2019 are that the appellant as well as private respondents therein were appointed as PSTs on contract basis vide Notification bearing endorsement No. 4672-5990/AE-1-Male/PST/Adhoc/Apptt: Dated Bannu the 06.05.2017. During course of his service, Khyber Pakhtunkhwa Employees of Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 was promulgated and in light of the same, his services were regularized vide Notification bearing Endorsement No. 2344-3253/AE-I/Estab dated 07.04.2018 with effect from the date of his initial appointment. The seniority list of the appellant as well as private respondents was drawn on the basis of the score obtained by them in the test conducted by National Testing Service (NTS). The appellant is of the view that his seniority inter-se was required to

ATTESTED

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 Khyber Pakhtunkhwa
 Services Tribunal
 Peshawar

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have been fixed age-wise in view of Clause-8 of terms and conditions of the regularization Notification dated 07.04.2018 as well as Sub-Section-2 of Section-4 of Khyber Pakhtunkhwa Employees of Elementary & Secondary Education, Department (Appointment and Regularization of Services) Act, 2017, therefore, he filed objection on the seniority list on 17.08.2019, however the same was not responded. The appellant there-after submitted departmental appeal on 26.08.2019 but the same was also not responded, constraining him to file appeal before this Tribunal for redressal of his grievance.

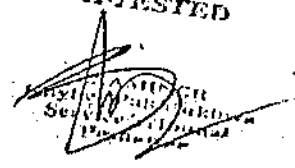
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5. On admission of the appeals for regular hearing, notices were issued to the respondents. Official respondents No. 1 & 2 contested the appeals by way of filing of reply, wherein they refuted the assertion raised by the appellants in their appeals.

6. Learned counsel for the appellants has addressed his arguments supporting the grounds agitated by the appellants in their service appeals. On the other hand, learned Deputy District Attorney for official respondents has controverted the arguments of learned counsel for the appellants and have supported the comments submitted by the official respondents.

7. Arguments have already been heard and record perused.

8. A perusal of the record would show that the appellants as well as private respondents in Service Appeals No. 2069/2019 to 2074/2019 as well as Service Appeals No. 2077/2019 and

ATTESTED


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2078/2019 were appointed as PSTs (BPS-12) on contract basis vide Notification bearing endorsement No. 8313-8514/PST/adhoc/ dated: Bannu the 23.07.2014 DEO/(M), while appellants as well as private respondents in Service Appeals No. 2075/2019 and 2076/2019 were appointed as PSTs on contract basis vide Notification bearing endorsement No. 1922-28/AE-1-Male/PST/Adhoc/ Apptt: Dated Bannu the 28.03.2016, whereas the appellant and private respondents in Service Appeal No. 2079/2019 were appointed as PSTs on contract basis vide Notification bearing endorsement No. 4672-5990/AE-1-Male/PST/Adhoc/ Apptt: Dated Bannu the 06.05.2017. During the course of their service, Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 was enacted and vide Notification bearing Endorsement No. 2344-3253/AE/Estab dated 07.04.2018, their services were regularized with effect from the date of their initial appointments. Clause-8 of Terms and Conditions as mentioned in the afore-mentioned regularization Notification dated 07.04.2018 is regarding determination of seniority, which is reproduced as below:-

"Their Seniority 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 employees older in age shall rank senior to the younger one." (Emphasis provided)

9. Moreover, the criteria for determination of seniority inter-se ~~TESTED~~ of the employees regularized under Khyber Pakhtunkhwa

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Khyber Pakhtunkhwa
Service Department
Bannu

Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 has been provided in Sub-Section 2 of Section-4 of the said Act, which is reproduced as below:-

"4. Determination of seniority.---(1) The employees whose services 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, or 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. (Emphasis supplied.)

10. It is also worth mentioning that according to Section-5 of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017, the provisions of the said act shall have an overriding effect and the provisions of any such law or rules to the extent of inconsistency with the said Act shall cease to have effect.

11. In view of Clause-8 of regularization Notification bearing Endorsement No. No. 2344-3253/AE/Estab dated 07.04.2018 as well as Sub-Section-2 of Section-4 of Khyber Pakhtunkhwa

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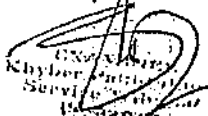
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Secretary
Khyber Pakhtunkhwa
Department of Education

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Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017, the seniority inter-se of the regularized PSTs was to 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 was the same, the employee older in age shall rank senior to the younger one. While going the impugned seniority list attached by the appellants with their appeals, the inter-se seniority of the PSTs regularized through Notification dated 07.04.2018 has been determined on the basis of score obtained by them in written test conducted through NTS, which was not a correct criteria for determining their inter-se seniority. The NTS score was relevant for appointment and not for determining seniority inter-se of the regularized PSTs.

12. In view of the above discussion, it is directed that the inter-se seniority of those PSTs, who were regularized through Notification bearing Endorsement No: 2344-3253/AE-I/Estab dated 07.04.2018, shall be determined on the basis of Clause-8 of terms and conditions of regularization Notification dated 07.04.2018 as well as Sub-Section-2 of Section-4 of Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017 by placing the names of the appellants at correct seniority positions with all consequential benefits. The

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Services

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appeals are allowed in the said terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
31.05.2023

(Salah-Ud-Din)
Member (Judicial)

(Muhammad Akbar Khan)
Member (Executive)

Naren Amin

Certified to be true copy

SEAL OF
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 01-6-23
Number of Pages 11
Copying Fee 55/-
Urgent _____
Total 55/-
Name of Applicant _____
Date of Completion 14-7-23
Date of Delivery of Copy 14-7-23

Attested

Yousaf
Jagat Khan
Advocate,
10th Court House



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223587)

Aux E
(26)

No. SO(Primary-M)E&SED/4-7/Seniority of PSTs under Act, 2017/Court Case/2024
Peshawar Dated 26th June, 2024

To,

The Director
Elementary & Secondary Education Department
Khyber Pakhtunkhwa, Peshawar

Subject: GUIDANCE REGARDING EXTENTION OF BENEFITS (SENIORITY ON AGE-WISE) TO ALL SIMILARILY PLACED PSTs (BPS-12) THROUGHOUT KHYBER PAKHTUNKHWA ON THE ANALOGY OF JUDGEMENT DATED 31-05-2023 OF THE HONORABLE SERVICE TRIBUNAL, PESHAWAR IN SERVICE APPEALS NO. 2069/2019 TO 2079/2019.

I am directed to refer to your letter No. 3656(AD Lit-II) dated 09-01-2024 on the subject noted above and to enclose herewith a copy of letter No. ALO(OP)/LD/15-2/2023/KC/7405-7408 dated 20-05-2024 received from Law Department Khyber Pakhtunkhwa which is self-explanatory for further necessary action, please.

Encl: AA

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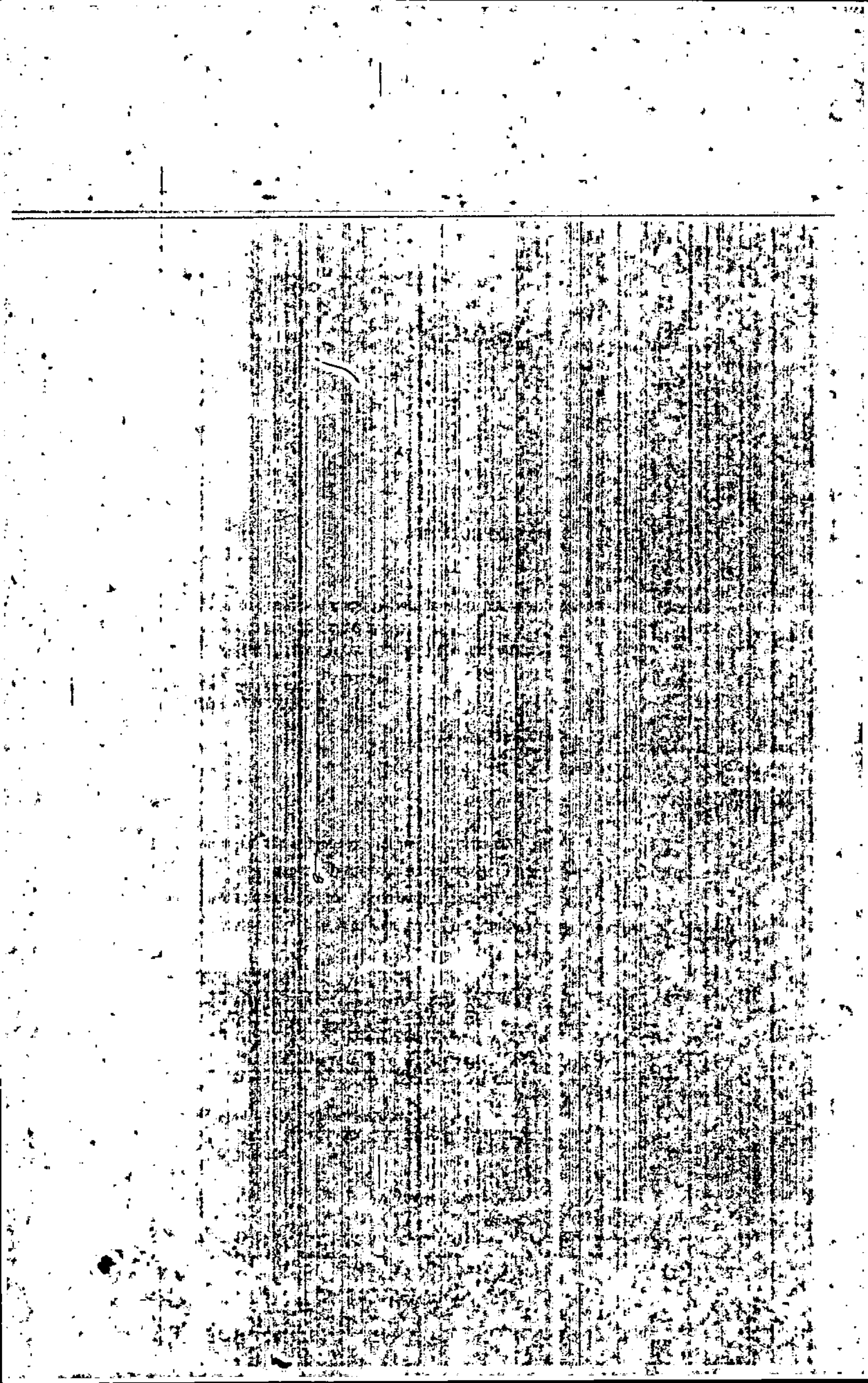
1. Assistant Law Officer (Opinion) Law Department Khyber Pakhtunkhwa w/r to his letter cited above.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

(REHMAN GULY) 26/06/24
SECTION OFFICER (PRIMARY MALE)

(REHMAN GULY) 26/06/24
SECTION OFFICER (PRIMARY MALE)

Y. Khan
Y. Khan
Advocate,
Shah Gauri Meads.

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GOVERNMENT OF KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS &
HUMAN RIGHTS DEPARTMENT

27

No. ALO(OP)/LD/15-2/2023/KC 7405-7408
DATED: PESH; THE 20TH MAY, 2024

To
The Secretary,
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Attention: Section Officer (Primary Male)

Subject: - **GUIDANCE REGARDING EXTENTION OF BENEFITS. (SENIORITY ON AGE-WISE) TO ALL SIMILARLY PLACED PSTs (BPS-12) THROUGHOUT KHYBER PAKHTUNKWA ON THE ANALOGY OF JUDGMENT DATED 31-05-2023 OF THE HONORABLE SERVICE TRIBUNAL PESHAWAR IN SERVICE APPEAL NO. 2069/2019 TO 2079/2019.**

Dear Sir,

I am directed to refer your Department's letter No. SO(Primary Male)-E&SED/4-7/Seniority of PSTs Under Act, 2017/Court Case/2024, dated, 17.04.2024 on the subject noted above and to state that the Scrutiny Committee of Law Department opined in its meeting held on 06-09-2023 that in terms of section 4(2) of Khyber Pakhtunkhwa Employees of Elementary & Secondary Education Department (Appointment, Regularization) Act, 2017, which stipulate, determination of seniority on the basis of age. The Scrutiny Committee further held that the said section of law outlines the method for determining seniority of the employees, whose services were regularized within a specific cadre under the Act ibid. Moreover, seniority is determined based on their continuous service within the cadre and if two or more employees have the same date of continuous service the employee older in age is to be considered senior to the younger one. Furthermore, the Act ibid has overriding effect on Rule 17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 which is not attracted to the seniority inter se of the employees, regularized under the Act ibid.

2. Hence, keeping in view the above, Law Department further holds that leaving aside the judgment of Service Tribunal dated 31-05-2023 in Service Appeal No. 2069/2019 to 2079/2019, benefit of section 4(2) of the Act ibid may be extended to all the employees regularized under the said Act after advice of the Scrutiny Committee dated 06-09-2023 ibid, please.

OFFICE OF SECRETARY, LAW DEPARTMENT

Copy No. 1954

Date: 21/5/2024

Yours Faithfully,

SAYED SAQLAIN HAIDER
Assistant Law Officer (Opinion)

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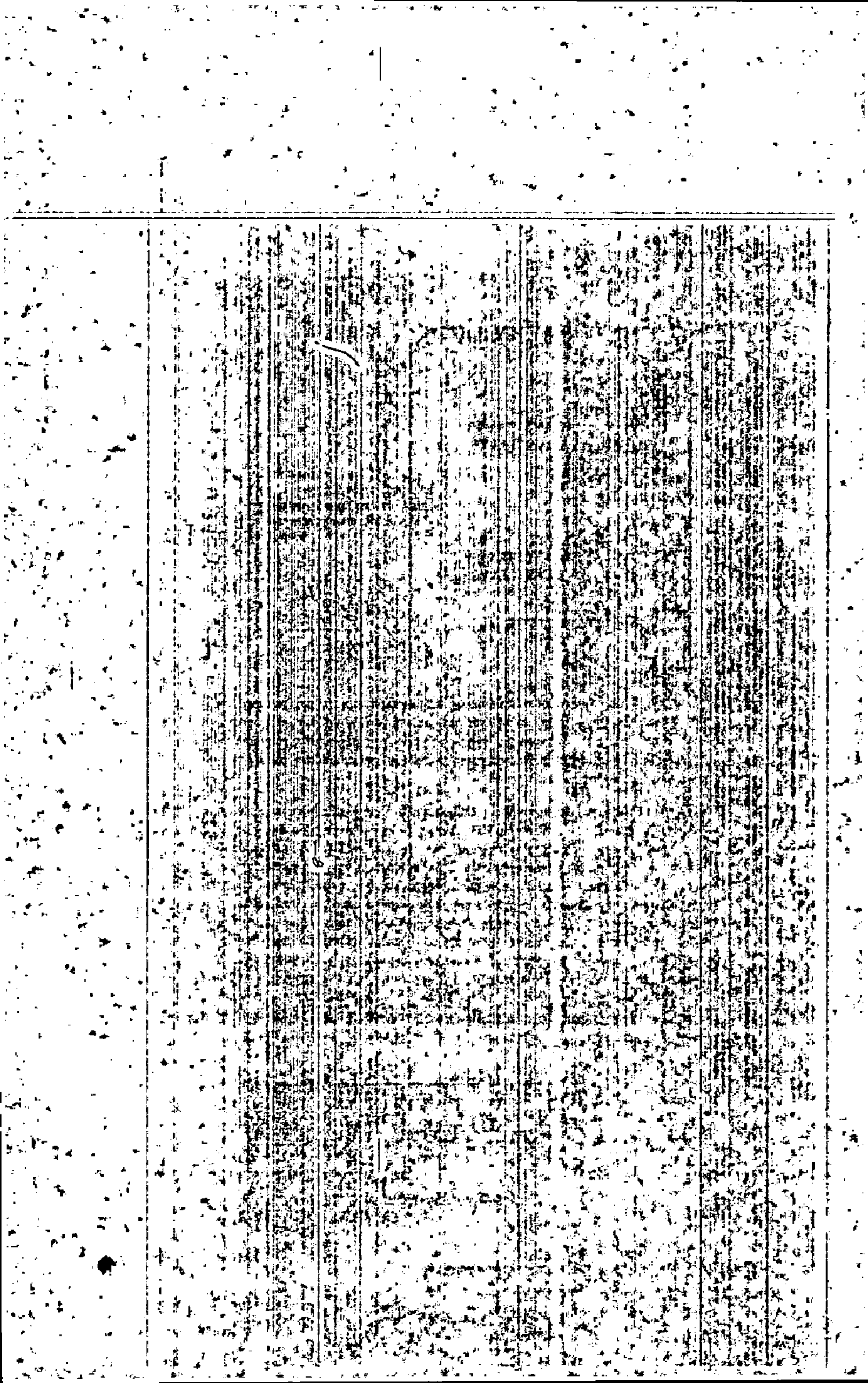
Copy is forwarded for information to the:-

1. PS to Minister for Law Department.
2. PS to Secretary, Law Department.
2. Master File.

SAYED SAQLAIN HAIDER
Assistant Law Officer (Opinion)

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Uzair Khan
Advocate,
Sindh Courts House.





(28)

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

NOTIFICATION

1. Whereas, the appellant Mr. Jan Baz Khan was appointed as Arabic Teacher (BPS-15) in District Bannu on adhoc/contract basis through NTS on 22-05-2014 and regularized vide Notification dated 21-03-2018. Thereafter, the DEO (M) Bannu notified seniority (merit-wise) of AT cadre on 15-10-2019 in terms of Section-8 of Civil Servant Act, 1973 read with Rules-17 of (Appointment, Promotion & Transfer) Rules 1989, wherein, the name of the appellant was shown at S.No. 84 among his other colleagues.
2. And whereas, aggrieved of the seniority ibid, the appellant invoked the constitutional jurisdiction under Article-212 of the Islamic Republic of Pakistan, 1973 through filing Service Appeal No. 887/2020 before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar, whereby the appellant impugned the seniority list stood on 26-10-2019 of ATs (BPS-15) in District Bannu with the prayer, that the same may be prepared age-wise in accordance with the Sub-Section-2 of Section-4 (Appointment & Regularization of Services) Act of 2017.
3. And whereas, the case of the appellant was decided vide judgment dated 31-05-2023 by the Honorable Tribunal in favor of the appellant with the direction to the Department, reproduced in verbatim as under:-

"Inter-se-seniority of the appellant shall be determined age-wise on the basis of Notification dated 21-03-2018 as well as Sub-Section-2 of Section-4 of KP E&SE Department (Appointment & Regularization of Services) Act, 2017 by placing the name of the appellant at correct position in the seniority list of the concerned Arabic Teacher with all consequential benefits".

4. And whereas, the case was declared as UNFIT for filing CPLA before the apex Court by the law Department, whereafter, the DEO (M) Bannu implemented the Judgment ibid to the extent of seniority (age-wise) and submitted working papers to this Directorate for promotion of the appellant to the post of SST(BPS-16) in compliance of the judgment supra, whereafter, the case was referred to the meeting of Departmental promotion committee held on 13-12-2023 and the committee has recommended that, the promotion Notification No. 8565-70 dated 07-02-2020 be withdrawn to the extent of Mr. Safdar Ali Shah SST (B/C) (BPS-16) only and Mr. Janbaz Khan - AT (BPS-15) be promoted to the post of SST (BPS-16) with immediate effect.

Now therefore, in compliance of the Judgment dated 31-05-2023 of the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar & recommendations of Departmental Promotion Committee, the competent authority (Director E&SE Khyber Pakhtunkhwa) is pleased to withdraw the promotion Notification No. 8565-70 dated 07-02-2020 to the extent of Mr. Safdar Ali Shah SST (B/C)(BPS-16) and the appellant Mr. Jan Baz Khan AT (BPS-15) is hereby promoted to the post of SST(BPS-16) in terms of Rule-7 of the (Appointment, Promotion & Transfer) Rules, 1989 with immediate effect in the interest of public service. Moreover, their services are placed at the disposal of DEO (M) Bannu for further adjustment.

Terms and Conditions:-

1. He shall be on probation for a period as specified in Rules (15) substituted vide No.SO(Policies)/E&AD/1-3/2017 Dated. 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989.
2. He will be governed by such rules and regulations as may be issued from time to time by the government
3. His services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.

Yousaf
Safdar Khan
Advocate,
Shah Gharib Road

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- 5 His Inter-Se- seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
- 6 No TADA is allowed for joining the duty.
- 7 He will give an undertaking to be recorded in his service book to the effect that if any over payment is made to him in light this order, will be recovered and if he is wrongly promoted, he will be reversed.
- 8 Before handing over charge, his documents may be checked. If he does not possess the required relevant qualification as per rules, he may not be handed over the charge of the post.

(Samina Altaf)
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

No: 4172-76 /F.No. (AD/LI-II)/SA No. 887/2020/Jan Baz/2023. Dated Peshawar the: 23/2/2024

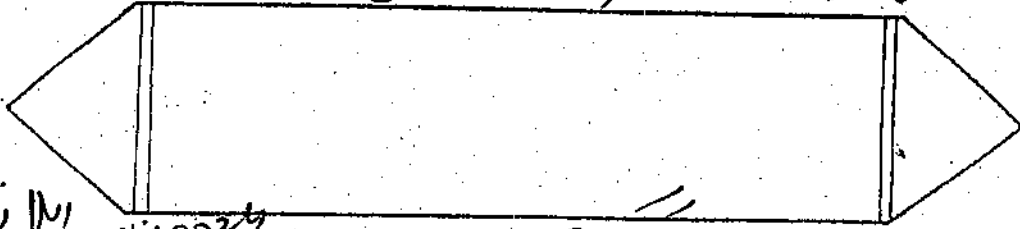
Copy forwarded for information & reaction to the:-

- 1 Learned Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 2 Learned AAG Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 3 District Education Officer (Male) Bannu.
- 4 District Accounts Officer District Bannu.
- 5 Deputy Director (Legal) E&SE Khyber Pakhtunkhwa
- 6 Section Officer (LI-II) E&SE Department Khyber Pakhtunkhwa.
- 7 PA to Additional Secretary (General) E&SE Department Khyber Pakhtunkhwa.
- 8 PA to Director E&SE Khyber Pakhtunkhwa.
- 9 Official concerned
- 10 Master File.

[Signature]
Assistant Director (Estab-M-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
23/2/2024

[Handwritten notes]
23/2/2024

بعدالت کرونگز ٹریبیونل لیتا در



2024ء پنجاب ہائی کورٹ
بنام راجو کیشن و علی

مورخہ 5 اگست
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ بند رجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام لیتا در کیلئے لیتا در کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک در و پیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرا میں پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی نیز وائر 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 نیا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو فرچہ ہر جانشینا کے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشگی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سند ہے۔

المرقوم 5
ماہ اگست 2024

بمقام لیتا در
Attested & Accepted
Sayed Khan
Advocate,
Oldi Gora Mandra