

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	25/03/2022	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p style="text-align: center;">Service Appeal No. 7427/2021</p> <p>Hadi Muhammad S/O Dost Muhammad R/O village Haryan Kot P.O & Tehsil Dargai District Malakand. ... (Appellant)</p> <p style="text-align: center;"><u>Versus</u></p> <p>Government of Khyber Pakhtunkhwa through Secretary Sports Culture, Tourism, Youth Affairs, Archeology & Museum Department, Peshawar and others. ... (Respondents)</p> <p style="text-align: center;"><u>ORDER</u></p> <p style="text-align: center;"><u>KALIM ARSHAD KHAN CHAIRMAN.</u>-Preliminary arguments of Mr. Ibrar ul Haq, Advocate, learned Counsel for the appellant present and Mr. Kabirullah Khattak, Additional Advocate General for the respondents, were heard yesterday.</p> <p>2. Through this appeal, the appellant (Hadi Muhammad), who is working as Junior Clerk in the Directorate General of Sports and Youth Affairs, Khyber Pakhtunkhwa, Peshawar, contended that as per Service Rules he was fulfilling all the required qualification and was eligible for promotion to the post of Assistant BPS-16 and for the purpose a working paper was also prepared by the Director Youth Affairs in which the appellant was recommended for promotion to the post of Assistant BPS-16. Despite the recommendations and working paper, the respondents were depriving him from his legal as</p>

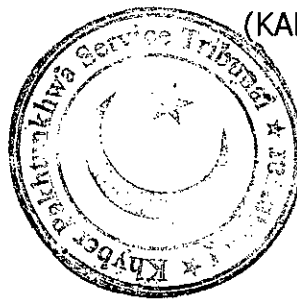
well as fundamental rights. Feeling aggrieved he filed departmental appeal before respondent No. 02 which was not responded till filing of the appeal, hence, the present appeal.

3. There is no one to deny that no final order is in the field which could enable the appellant to invoke the provisions of section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 to file appeal before this Tribunal. The contention of the appellant that he rendered the qualified service for promotion and was thus required to be promoted does not seem sound rather appears to be a pre-mature contention. Thus when there is no order detrimental to any of the rights of the appellants, this appeal is held to be pre-mature, not maintainable and is accordingly dismissed in *limine*. Consign.

4. Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal this 25th day of March, 2022.



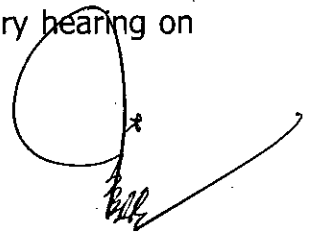
(KALIM ARSHAD KHAN)
Chairman



25.01.2022

Clerk of counsel for the ~~appellant~~ present. Mr. Muhammad Adeel Butt, Addl:AG for respondents present.

Former requests for adjournment due to general strike of the bar. Adjourned. To come up for reply/preliminary hearing on 24.03.2022 before S.B.



(Mian Muhammad)
Member(E)

24.03.2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Parawise comments on behalf of respondents No. 1 & 2 have been furnished through office and available on file. Preliminary arguments heard. To come up for order on 25.03.2022 before S.B.

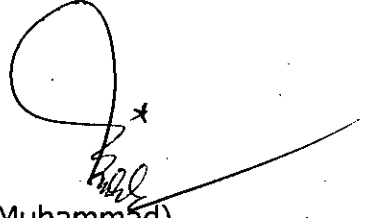


Chairman

15.11.2021

Counsel for the appellant present. Preliminary arguments have been heard.

Learned counsel for the appellant argued that the appellant has been serving as Junior Clerk (BS-11) in the Directorate General of Sports and Youth Affairs since his appointment as Junior Clerk on 17.12.2012. A working paper was prepared/submitted for promotion to the post of Assistant (BS-16) as two posts of Assistant were vacant and only the appellant's name was included from the Directorate for determining suitability and eligibility of one Junior Clerk (BS-11) to the post of Assistant (BS-16). Serial No.05 of the Service rules notified on 27.01.2017 prescribes the criteria and mode of promotion (falling 75% to the share of promotion on the basis of seniority cum fitness from amongst the junior clerk with atleast 7 years service as such). Based on quoted service rules, the appellant has rendered nearly 9 years service but he is not being promoted against the post of Assistant. His departmental appeal dated 21.06.2021 has not been responded within the stipulated statutory period hence the instant service appeal filed in service Tribunal on 20.09.2021. Since there is no original or appellate order of which the appellant is aggrieved, it would, therefore, be appropriate to issue a pre-admission notice to the official respondents to submit their reply/parawise comments and assist the Tribunal. Adjourned. To come up for preliminary hearing on 25.01.2021 before S.B.




(Mian Muhammad)
Member(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7427 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2021	<p>The appeal of Mr. Hadi Muhammad presented today by Mr. Ibrar-ul-Haq Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>15/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: _____

ملکون غیر ملکی کو اس کی اسٹیٹس اینڈ نوڈس اور اس کی
صادی مندر

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Abraz UL Haq</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 A.G/D.A.G?	✓	
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 cuttings/overwriting?		
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: _____

ABRAR UL HAQ

Signature: _____

(Signature)

Dated: _____

15/9/21

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. _____/2021

Hadi MuhammadAppellant

VERSUS

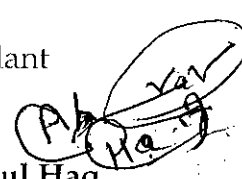
Govt of KP & another.....Respondents

INDEX

Sr #	Description of documents.	Annexure	Page
1)	Service Appeal		1-4
2)	Copy of Domicile	A	5
3)	Copy of CNIC	B	6
4)	Copy of DMCs	C/1 - C/3	7-9
5)	Copy of Office Order dated 17.12.2012	D	10
6)	Copy of Notification dated 27.01.2017	E	11-16
7)	Copy of Working Paper	F	17-18
8)	Copy of Promotion Application	G	19
9)	Copy of Final Seniority List	H	20
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11)	Wakalatnama		22

Appellant

Through


Abrar ul Haq
Advocate High Court
Peshawar

(1)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

Appeal No. 7427 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7609

Dated 20/9/2021

Hadi Muhammad S/o Dost Muhammad
R/o Village Haryan Kot P.O & Tehsil Dargai District Malakan

.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Sports Culture, Tourism, Youth Affairs, Archeology & Museum Department, Peshawar.
2. Director General Sports and Youth Affairs, Khyber Pakhtunkhwa Peshawar Sports Complex Peshawar.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 FOR PROMOTION OF THE APPELLANT TO THE
POST OF ASSISTANT BPS-16 AS PER THE SERVICE
RULES/NOTIFICATION NO. SO(YA)Y-9/SR/2017
DATED 27/01/2017 ONLY THE APPELLANT IS
ENTITLED AND IS FULFILLING THE REQUIRED
ELIGIBILITY.**

Filed to-day

Registrar

20/9/2021

PRAYER IN APPEAL

ON ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY KINDLY BE DIRECTED TO PROMOTE THE APPELLANT BEING ELIGIBLE AND SENIOR MOST FOR PROMOTION TO THE POST OF ASSISTANT BPS-16.

Respectfully Sheweth :-

Brief Facts:

The brief facts of the case giving rise to the instant Appeal are as under-

2

1. That the appellant is a loyal Citizen of Pakistan and permanently resides at District Malakand while serving here in District Peshawar as Junior Clerk in the Directorate General Sports and Youth Affairs, Khyber Pakhtunkhwa Peshawar. **(Copy of CNIC & Domicile Certificate is attached as Annex "A & B")**
2. That Appellant is FS.C qualified and is also diploma holder of Associate Engineer in Electrical technology of the year 2012. **(Copies are annexed as Annexure "C/1 to C/3)**
3. That Appellant was appointed as Junior Clerk (BPS-7) in the Directorate General Sports and Youth Affairs, Khyber Pakhtunkhwa Peshawar Sports Complex Peshawar Cantt, vide office Order No. 17/QSC/12. **(Copy of the Office Order is annexed as "D")**
4. That the post of the Junior Clerk was upgraded by the Provincial Government from BPS-7 to BPS-11, hence the post of Appellant was also upgraded from BPS-7 to BPS-11, hence, the appellant is now serving in BPS-11.
5. That the Directorate of Youth Affairs was separated from the Directorate of Sports in the year 2017 and the Appellant was serving there in the Directorate of Sports and youth affairs remained permanently to continue his official work in the Directorate of Youth Affairs.
6. That in the year 2017, in consultation with the Establishment Department and Finance Department the Sports, Culture, Tourism, Youth Affairs, Archaeology & Museum Department laid down/framed rules/method of recruitment, qualification and other conditions. Here it is pertinent to note that vide Notification No.SO(YA)Y-9/SR/2017 conditions specified in column No. 3 to 5 of the Appendix to this Notification, which shall be applicable to the posts in the Directorate of Youth Affairs Khyber Pakhtunkhwa, specified in column No. 2 of the said Appendix. **(Copy of the service rules are attached as "E")**
7. That as per Service Rules the appellant is fulfilling all the required qualification and is eligible for promotion to the post of Assistant BPS-16 and for this purpose the working paper was also prepared by the Director

Youth Affairs, in which the appellant was recommended for promotion to the post of Assistant BPS-16. **(Copy of the working paper is attached as Annex "F")**

8. That despite the recommendations and working papers the Respondents are depriving the Appellant from achieving his legal as well as fundamental rights, the Appellant filed departmental appeal before the Respondent No. 02 but the Respondents delaying the matter. **(Copy of the appeal/representation is attached as Annex "G")**
9. That till date neither any order is passed nor any response is given by the Respondents to the Appellant, hence the instant appeal is being filed on the following grounds;

GRUNDS:-

- A. That despite fulfilling all the requisite criteria the impugned act of Respondents by not promoting the Appellant to the post of Assistant (BPS-16) is inappropriate, against law, facts and illegal, hence, untenable.
- B. That as per Service Rules the method of recruitment for the post of Assistant BPS-16 is
- a) **Seventy five (75) percent by promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks with at least seven (7) years service as such; and**
 - b) **Twenty five (25) percent by initial recruitment:**
 Provided that if no suitable official is available for promotion, then by initial recruitment.
- C. That as per final seniority list of Junior clerk (BPS-11) of the Directorate of Youth Affairs Khyber Pakhtunkhwa the Appellant is not only on the top but he is the only Junior Clerk working in the Department of Youth Affairs. The appellant has also completed almost nine (9) years of service with unblemished record. **(Copy is attached as Annex "H")**
- D. That the annual confidential reports/PERs in respect of the appellant is showing his best performance, experience, capabilities, punctuality and keen interest in the official work as the appellant has always got good

- D. That the annual confidential reports/PERs in respect of the appellant is showing his best performance, experience, capabilities, punctuality and keen interest in the official work as the appellant has always got good remarks from his high-ups in ACRs/PERs since his appointment. **(Copy is attached)**
- E. That the working paper prepared by the department for the promotion of the appellant is itself admission of the stance and right of the appellant. Similarly, the post/seat of Assistant is vacant for 3/4 years but till now neither Respondents promoted the appellant nor refused.
- F. That other material points not specifically mentioned here will be raised at the time of argument with the permission of this Hon'ble Court.

It is, therefore, humbly prayed that instant appeal may kindly be allowed with the direction to the Respondents for issuance of the promotion of the Appellant as prayed for OR any other relief deem appropriate in the matter may kindly be allowed.

Abrar ul Haq
 Abrar ul Haq
 Advocate High Court,
 Peshawar

Affidavit:

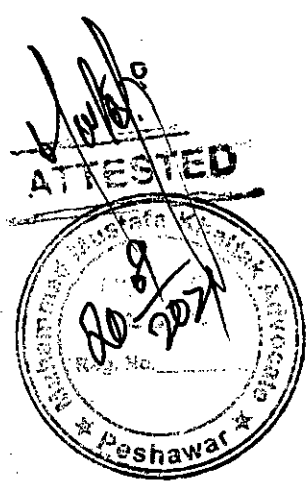
Stated upon oath that the contents of the instant appeal are true and correct to the best of my knowledge and belief.

Deponent *J. Muhammad*

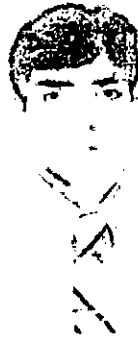
Certificate:-

Certified that the contents of the instant appeal are true and correct to the best of my knowledge and no such appeal has earlier been filed before this Hon'ble Court.

Deponent *J. Muhammad*



5



DOMICILE CERTIFICATE

I, the undersigned, being a permanent resident of the State of Karnataka, do hereby certify that the person named in the declaration is a permanent resident of the State of Karnataka and is entitled to the benefits of the State of Karnataka.

He is born in Villam Mohallah 1927

District Channarayana

**ABOVE
DECLARATION**

S. S. S. S.
Signature of Applicant

Date

In accordance to the declaration dated 10/12/2011 filed

PO/ W/ of 1001 1001

in the N.W.F.P. it is hereby certified that

the person named in the declaration is a permanent resident of the N.W.F.P. Having been born in the N.W.F.P. and settled in it.

I am satisfied myself personally / my knowledge verification that the above declaration is true and certify.

This is done on the 10 day of Dec 2011.

UNTERSIGNED

DISTRICT REVENUE OFFICER



DISTRICT REVENUE OFFICER

2270

116870

یادری محمد ولدان ازبک دوست محمد ساکن اقلقہ حریانلوٹ

شہد ہے۔ جو کہ مرے عقد نیابت اختیار میرد شاہ

مذکورہ قوم نشان ہے۔ یہی جو تو تمنا محفل سے تعلق رکھتا رکھتی ہے۔

مذکورہ قوم نے قبضہ ازیخ ہونی دو میسائل سرٹیفیکٹ حاصل نہیں کیا ہے۔

مذکورہ دو میسائل سرٹیفیکٹ کا شمار ہے۔ مذکورہ کو میری ذاتی ذمہ داری

میں ہے۔

سجید خان

سجید خان

جنرل کونسلر

SAJEED KHAN
GENERAL COUNCILOR
U.C. Hero Shah at Horyan East
Malakand Agency.

منا سبانی
گنڈاویں حسین جو اس وقت ہزارہ علاقہ میں ہے
میں ہادی محمد ولد دوست محمد ساکن حریانلوٹ رہتے ہوئے گھڑی میں شہان محفل حریان
میں ہزار شاہ صاحبزادے سے مسائل قوم اتقان قبیلہ اتقان محفل سے تعلق رکھتا ہے۔
مشغل کے والد صاحب نے ایجنسی ہزار میں اپنا قومی شناختی کارڈ نمبر 242501-89-117
میں اپنا نام لکھا ہے۔ اس کا کاپی لکھی ہوئی ہے۔ اس کا نمبر 117-89-242501 ہے۔


سلطان حسین
Commander
Peshawar

9/8/07

Annex

B

6

**PAKISTAN** National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN


Name
Hadi Muhammad

Father Name
Dost Muhammad Khan

Gender: M Country of Stay: Pakistan

Identity Number: 15401-7302637-7 Date of Birth: 21.04.1989

Date of Issue: 05.10.2020 Date of Expiry: 05.10.2030



Holder's Signature

Albar
15401-7302637-7

15401-7302637-7

سٹیٹ بچہ بہرمان کوٹ، تحصیل درگئی، ضلع مالاکنڈ

سٹیٹ بچہ بہرمان کوٹ، تحصیل درگئی، ضلع مالاکنڈ



101431283406

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

FEDERAL BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
ISLAMABAD

Serial No. 309894

Certificate No. 707224/830335

Roll No. 100562
100562

Registration No. 0647310009

Group SCIENCE
SCIENCE

Attempt (s) MULTIPLE



7

SECONDARY SCHOOL CERTIFICATE EXAMINATION
ANNUAL- 2007

Certified that HADI MUHAMMAD
Certified that HADI MUHAMMAD
son / daughter of DOST MUHAMMAD
son / daughter of DOST MUHAMMAD
whose date of birth is 21-04-1989 21ST day of
APRIL one thousand nine hundred EIGHTY-NINE



has qualified for award of Secondary School Certificate
at the examination held in the month of APRIL/MAY as a EX-STUDENT
candidate from ZAFAR SHAHEED ARMY PUBLIC SCHOOL, DARGAI FORT
MALAKAND AGENCY
MALAKAND AGENCY.

as per statement of marks given below and has obtained
grade C
His / Her mark of identification :

SUBJECT - WISE STATEMENT OF MARKS			
Sr. No Sr. No	SUBJECTS	MARKS	
		Maximum	Obtained
1	ENGLISH (COMPULSORY)	150	091
2	URDU (COMPULSORY)	150	085
3	ISLAMIYAT	075	043
4	PAKISTAN STUDIES	075	041
5	MATHEMATICS	150	058
6	PHYSICS	150	075
7	CHEMISTRY	150	067
8	BIOLOGY	150	086
TOTAL		1050	546

(Marks in words) FIVE HUNDRED AND FORTY SIX ONLY

Abbas
MIRJALIL

Islamabad Dated November 02, 2007
November 02, 2007

SECRETARY

S.No. 81306

(8) c/2

BOARD OF INTERMEDIATE & SECONDARY EDUCATION MALAKAND



CHAKDARA (N.W.F.P) PAKISTAN
INTERMEDIATE CERTIFICATE EXAMINATION
DETAILED MARKS & PROVISIONAL CERTIFICATE

INTERMEDIATE (PART-II ANNUAL) EXAMINATION, 2009

Roll No: 19673

Group: Pre-Medical

Hadi Muhammad Son of Dost Muhammad Khan

of Govt Degree College Dargai

has secured the marks shown against each subject in the H.S.S.C Examination held in the month of April as Regular candidate.

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	35	--	35	--	70	Seventy Only
Urdu	200	52	--	52	--	104	One Hundred Four
Islamic Education	50	21	--	--	--	21	Twenty One
Pakistan Studies	50	--	--	21	--	21	Twenty One
Physics	200	42	13	42	13	110	One Hundred Ten Only
Chemistry	200	37	13	37	13	100	One Hundred Only
Biology	200	37	13	37	13	100	One Hundred Only
Total : 1100		Marks :		526-0	Five Hundred Twenty Six Only		
		Remarks :					

Prepared By: Habib Khan

Checked By: [Signature]

Note: Errors / Omissions excepted. Any mistake in Name etc must be intimated within 30 days after receiving the above certificate.

Computer Cell BISE, Malakand.
Date: 08.07.2009, 12:03 PM

Alsoor

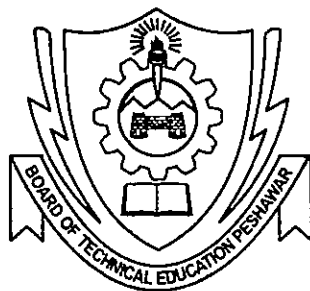
[Signature]

Controller of Examinations
B.I.S.E, Malakand.

c/b
429079

9

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION



PESHAWAR

DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 3RD YEAR ELECTRICAL TECHNOLOGY

Name of Candidate HADI MUHAMMAD

Father's Name DOST MUHAMMAD KHAN

Roll.No. 672590 Session ANNUAL 2012

Reg.No. MCT/MKD/ET/09-23639

Institute/College MALAKAND COLLEGE OF TECHNOLOGY & VOCATIONAL TRAINING CENTRE MALAKAND

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
2nd Year Marks	2250			1,602	
1 GEN-311 Isjamyat/Pak. Studies	50	28	-	28	Twenty-eight
2 MGM-311 Industrial Manag: Human Relation	50	22	-	22	Twenty-two
3 MGM-321 Business Communication	50	21	-	21	Twenty-one
4 ET-316 A.C. Machines	200 / 100	151	98	249	Two hundred forty-nine
5 ET-322 Power Plant & Energy Conservation	100	40	-	40	Forty
6 ET-335 Trans: Dist: & Project of Elect Power System	200 / 50	103	48	151	One hundred fifty-one
7 ET-343 Telecommunication	100 / 50	57	48	105	One hundred five
8 ET-353 Repair & maintenance of Electrical Equipment	50 / 100	22	95	117	One hundred seventeen
9 ET-364 Digital & Industrial Electronics	150 / 50	60	49	109	One hundred nine

3550

2444

Two thousand four hundred forty-four

Prepared by Muhammad Adnan

Checked by _____

Theory Passing Marks=40% Practical Passing Marks=50%

Error(s) & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate


 CONTROLLER OF EXAMS

01/09/2012



Sports are essential for the development of a happy, healthy & vigorous society

**DIRECTORATE GENERAL SPORTS AND
YOUTH AFFAIRS, KHYBER PAKHTUNKHWA**

PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph: # 9212767, Fax # 9212766

Dated Peshawar 17-12-2012

Annex

OFFICE ORDER

No. 17/QSC/12: On the recommendation of Departmental Selection Committee, the following individuals are appointed as Junior Clerk and Care Takers on the newly created posts noted against each in (BPS-7) in the Directorate of Sports and Youth Affairs, Khyber Pakhtunkhwa with immediate effect on the terms and conditions mentioned below:-

S/#	NAME AND PARENTAGE	APPOINTED AS
1.	Mr. Hadi Muhammad S/O Dost Muhammad, Village Haryan Kot P.O & Teh: Dargi Malakand.	Junior Clerk.
2.	Mr. Mustaq Khan S/O Nasrullah Khan, Charkhana Moh: Hujra Nazim Hamayun near Gulbarg No.4 Peshawar.	Care Taker.
3.	Mr. Hassan Nangial S/O Nawab Ali Yousafzai, H/No. 502 Street No.1 Pattan Colony Kohat Road Peshawar.	Care Taker.
4.	Mr. Muhammad Yasir Islam S/O Islam-ud-Din Shami, Gulistan Colony Nothiya Qadeem Talab Masjid Road Peshawar Cantt.	Care Taker.

TERMS AND CONDITIONS.

- i- Their services are liable to be terminated without assigning any reason. In case, they wish to resign from service, 30-days advance notice will be necessary or in lieu thereof, 30-days pay shall be forfeited.
- ii- Their services will be on one year probation period as provided under Rule-6 (2) of Civil servant Act, 1973.
- iii- They will be governed by such rules and orders relating to pay, allowances, leave, T.A., Medical attendance, etc as applicable to government servants of the same category as may be issued by the government from time to time.
- iv- They will not be entitled for pension or gratuity. However, in lieu of pension or gratuity, they shall be entitled to receive Contributory Provident Fund in terms of Khyber Pakhtunkhwa Civil Servants Amendment Act 2005 (Khyber Pakhtunkhwa Act No. IX of 2005).
- v- The selectee should join their duties within 15 (fifteen) days of the issuance of this order.
- vi- They will produce fitness certificate from the Medical Superintendent / Civil Surgeon.
- vii- Their age should not exceed 30 years or below 18 years.

Altaf Umerzai
DIRECTOR GENERAL

(ALTAF UMERZAI)
DIRECTOR GENERAL

Dated 17-12-2012

Endst: No. 17QSC/07

Copy forwarded to: -

- i- Secretary, Sports and Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar.
- ii- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- iii- Private Secretary to Minister for Sports and Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar for the perusal of Minister Sports.
- iv- Budget and Accounts Officer, o/o D.G Sports & Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar.

P-9

Service Rule (11)

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
SPORTS, CULTURE, TOURISM, YOUTH AFFAIRS, ARCHAEOLOGY AND
MUSEUMS DEPARTMENT.

NOTIFICATION

D.No. 1222
Date: 29-1-17
Directorate General of Sports
KPK Peshawar Cantt.

Peshawar, dated the 27/01/2017.

No. So(YA)Y-9/SR/2017- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Sports, Culture, Tourism, Youth Affairs, Archaeology & Museums Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of 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 in the Directorate of Youth Affairs Khyber Pakhtunkhwa, specified in column No. 2 of the said Appendix.

Annex E

APPENDIX

S.No	Nomenclature of post	Minimum Qualification for appointment by initial recruitment	Age limit	Method of recruitment
1	2	3	4	5
1.	Director	—	—	By Promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors with at least seven (7) years service in BS-18 or twelve (12) years service in BS-17 and above, subject to successful completion of Mid-Career Management Course: Provided that if no suitable officer is available for promotion, then by

Above
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				transfer or deputation of a suitable officer from the Provincial Government.
2.	Deputy Director	—	—	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors having at least five (5) years service as such;</p> <p>Provided that if no suitable officer is available for promotion then by transfer or deputation of a suitable officer from the Provincial Government.</p>
3.	Assistant Director	At least Second Class Master Degree, BS (honor) or equivalent qualification from a recognized University in Social Sciences or Management Sciences or Information Technology.	21-32 years	<p>(a) Sixty (60) percent by promotion, on the basis of seniority-cum-fitness, from amongst the District Youth Officers having at least five (5) years service as such;</p> <p>(b) ten percent by promotion from amongst the Assistants, with at least seven (7) years service as such; and</p> <p>(c) thirty (30) percent by initial recruitment:</p> <p>Provided that if no suitable official is available for promotion, then by transfer of a suitable officer from the Provincial Government.</p>
4.	District Youth Officer	At least Second Class Bachelor's	21-32 years	(a) Forty (40) percent by promotion, on the basis of

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		Degree or equivalent qualification from a recognized University.		seniority-cum-fitness from amongst the Computer Operators, with at least twelve (12) years service as such; and (b) sixty (60) percent by initial recruitment: Provided that if no suitable official is available for promotion, then by initial recruitment.
5.	Assistant	At least Second Class Bachelor's Degree or equivalent qualification from a recognized University.	21-30 years	(a) Seventy five (75) percent by promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks with at least seven (7) years service as such; and (b) twenty five (25) percent by initial recruitment: Provided that if no suitable official is available for promotion, then by initial recruitment.
6.	Computer Operator	(a) At least Second Class Bachelor's Degree in Computer Science, Information Technology (BCS/BIT) four years) or equivalent qualification from	21-35 years	By initial recruitment.

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		<p>a recognized University; or</p> <p>(b) at least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.</p>		
7.	Junior Clerk	<p>(a) At least Second Class Intermediate Certificate or equivalent qualification from a recognized Board; and</p> <p>(b) a speed of thirty (30) words per minute in typing.</p>	18-30 years	<p>(a) Twenty-five (25) percent by promotion, on the basis of seniority-cum-fitness, from amongst Naib Qasids, Chowkidars and Malies, with at least two years service as such, who have passed the Intermediate Certificate Examination; and</p> <p>(b) seventy five (75) percent by initial recruitment.</p> <p>Note: For the purpose of promotion a joint seniority list shall be maintained of Naib Qasids, Chowkidars, and Malis with reference to the date of their acquiring the Intermediate Certificate.</p>

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				<p>Provide that—</p> <p>(a) if two or more officials have acquired the Intermediate Certificate in the same session, the interse seniority in the lower post shall be maintained for determining the seniority in the higher post;</p> <p>(b) where a senior official does not posses the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials as the case may be; and</p> <p>(c) if no suitable official is available for promotion, then by initial recruitment.</p>
8.	Driver	Literate having LTV driving license issued by the competent authority. Preference will be given to those who have sufficient experience in driving, repair	18-40 years	By initial recruitment.

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		and maintenance of vehicles.		
9.	Naib Qasid	Literate	18-40 years	By initial recruitment.
10.	Chowkidar	Literate with sound physique and two years work experience as such.	18-40 years	By initial recruitment.
11.	Mali	Literate and two years working experience as Mali.	18-40 years	By initial recruitment.
12.	Sweeper	Literate	18-40 years	By initial recruitment.

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Secretary to
Government of the Khyber Pakhtunkhwa
Sports, Culture, Tourism, Youth Affairs, Archaeology
And Museums Department.

Endst: No. SO(YA)Y-9/SR/2017/1106-68 dated Peshawar the, 27th January, 2017.

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. All Deputy Commissioners, Khyber Pakhtunkhwa.
3. Director Youth Affairs, Khyber Pakhtunkhwa.
4. Registrar Peshawar High Court, Khyber Pakhtunkhwa.
5. Registrar Service Tribunal, Khyber Pakhtunkhwa, Peshawar.
6. Manager Government Printing Press, Peshawar for publication in the next issue of the Government Gazette. 50 copies of the Gazette notification when published send to this department.
7. Secretary, Public Service Commission, Khyber Pakhtunkhwa, Peshawar.
8. Section Officer (SR-I) Establishment & Administration Department, Govt. of Khyber Pakhtunkhwa.
9. Section Officer (FR), Finance Department, Govt. of Khyber Pakhtunkhwa.
10. PS to Secretary, Sports & Youth Affairs, Khyber Pakhtunkhwa.

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ATTESTED

~~Section Officer
(Sports & Youth Affairs)~~

17

F

WORKING PAPER

Subject: **PROMOTION TO THE POST OF ASSISTANT (BPS-16) IN THE DIRECTORATE YOUTH AFFAIRS KHYBER PAKHTUNKHWA.**

Two (02) posts of Assistant (BPS-16) falling to the share of promotion quota has fallen vacant in the Department of Youth Affairs, for the reason given below:-

- i. One (01) post Assistant BPS-16 has newly been created/sanctioned in the financial year 2017-18 at Directorate of Youth Affairs Khyber Pakhtunkhwa Peshawar (**Annexure-I**).
- ii. One (01) post Assistant BPS-16 has newly been created/sanctioned in the financial year 2018-19 at Directorate of Youth Affairs Khyber Pakhtunkhwa Peshawar (**Annexure-II**).

2. Under the Service & Recruitment Rules, 2017, the following method has been prescribed for recruitment to the post of Assistant (BPS-16) (**Annexure-III**).

- a). Seventy five percent (75%) by promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks (BPS-11) with at least seven (07) years service as such : and
- b). Twenty five percent (25%) by initial recruitment.

Approved

3. There are two (02) sanctioned posts of Assistants (BPS-16) in the Department of Youth Affairs. These posts are to be filled by promotion from amongst the holders of the posts of Junior Clerks BPS-11 (**Annexure-IV**).

4- According to the seniority list of Junior Clerks (BPS-11) (**Annexure-V**), the following official is due for promotion to the post of Assistant (BPS-16) in the Department of Youth Affairs:

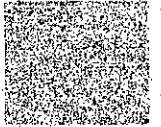
S#	Name of incumbent	Qualification	Date of Regular / Appointment/ promotion to the Present post.	Whether Completed seven Years Service	Whether eligible For promotion	Remarks.
1	Hadi Muhammad	FSc	19-12-2012	Yes	Yes	

5. Attested copies of PERs synopsis and bio-data of the official concerned is attached

6. It is certified that the official recommended for promotion:-


- a) Holds the lower post on regular basis.
- b) Have prescribed minimum length of qualifying service / experiences as prescribed under the service recruitment rules.
- c) No departmental / professional examination has been prescribed to be passed under the rules.
- d) No publication has been prescribed to be published under the rules. Neither any disciplinary / departmental proceedings / Anti-corruption case / judicial enquiry is pending against the official concerned nor was any penalty imposed on him during the last seven years.

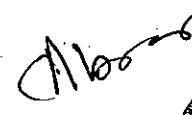
18



- e) The official recommended for promotion is not on deputation to any organization under the Federal Government or under the Provincial Government / Autonomous / International organization.
- f) Certified that the Seniority List is not disputed / sub-judice.

7. The Departmental Promotion Committee is requested to determine suitability and eligibility of one **(01) Junior Clerk (BPS-11)** for promotion to the posts of **Assistant (BPS-16)** in the Department of Youth Affairs, Khyber Pakhtunkhwa.


DIRECTOR
YOUTH AFFAIRS


ATTESTED

23

19

SECRETARY
Sports, Culture, Tourism, Youth Affairs
& Museums Department
Khyber Pakhtunkhwa
Duty No: 10639
Date: _____

To

The Secretary Sports, Tourism, Archeology,
Culture & Youth Affairs, Department of Government of
Khyber Pakhtunkhwa.

SUBJECT: DEPARTMENTAL APPEAL.

Respected Sir!

That the undersigned has been appointed as Junior Clerk in the Directorate Youth Affairs Khyber Pakhtunkhwa, Peshawar on 19/12/2012 as Junior Clerk.

That after the formation of Youth Affairs Department the undersigned was Posted/Transferred in the Youth Affairs Department.

That there are two vacant Posts/Seats of Assistant (BPS-16) in the Youth Affairs Department for which the working Paper was prepared and the undersigned being eligible as per Rules was nominated to be promoted as per rules enumerated for the post of Assistant (BPS-16) as under:

- (a) **Seventy five (75) percent by promotion on the basis of seniority-cum-fitness, from amongst the Junior Clerks with at least seven (7) years of service as such;**
- (b) **Twenty five (25) percent by initial recruitment;**

That there are two vacant posts of Assistants (BPS-16) and the department also prepared working paper for filling up the vacant seats as well as nominated the undersigned for promotion to the post of Assistant (BPS-16) being eligible and fit for the post of Assistant the undersigned has completed almost nine (9) years of service while the required experience is seven (7) years.

That the undersigned time and again requested the Director Youth Affairs verbally as well as through written application but in-vain(**Copy Annexed**)

It is, therefore, requested to kindly consider the undersigned for promotion on the vacant post as per rules and regulations.

[Handwritten signature]
ADVISOR

Yours faithfully,
[Handwritten signature]
Hadi Muhammad

Junior Clerk

Dated: 21-06-2021



DIRECTORATE OF YOUTH AFFAIRS
KHYBER PAKHTUNKHWA

PANYALA HOUSE, OPPOSITE PESHAWAR PUBLIC SCHOOL & COLLEGE
WARSAK ROAD, PESHAWAR.

"H" 22

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FINAL SENIORITY LIST OF JUNIOR CLERK (BPS-11) OF THE
DIRECTORATE OF YOUTH AFFAIRS KHYBER PAKHTUNKHWA AS STOOD ON 30-06-2020.

Total Sanctioned Posts: 29
Initial Quota: 22
Promotion Quota : 7

S.#	Name of Incumbents with academic qualification	Date of Birth with Domicile	Date of 1 st Entry into Govt: Service	Date of Regular Appointment /Promotion/ to the present post	Method of Recruitment	Station of Duty.
1.	Hadi Muhammad F.sc	21-04-1989 Malakand	19-12-2012	19-12-2012	Initial	Directorate of Youth Affairs

Certified that the seniority list was circulated to the concerned and is final and un-disputed.

[Handwritten signature]

[Handwritten signature]
DEPUTY DIRECTOR (ADMN)

"I"

21

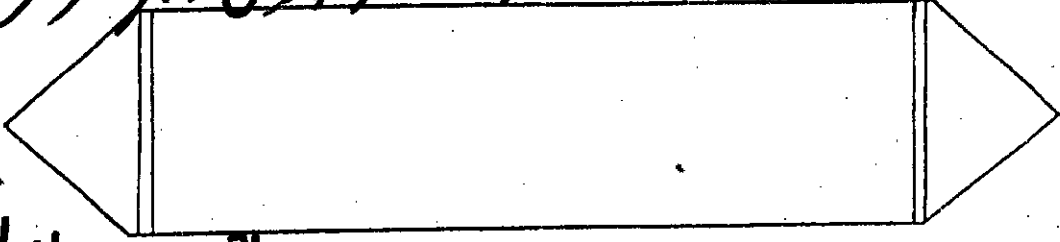
ANNUAL CONFIDENTIAL REPORTS SYNOPSIS IN RESPECT OF MR. HADI MUHAMMAD JUNIOR CLERK BPS-11.

S.#	YEAR	GRADING	GENERAL REMARKS	ADVERSE REMARKS
1.	2013	V Good	Hard worker and Taking keen interest is his duty. Performed duty very honestly .fit for promotion.	
2.	2014	V Good	Taking keen interest is his duty. Fully familiar with his office work i.e. Budget etc. performs duty honestly and fit for promotion.	
3.	2015	V Good	He is intelligent and hard worker and is punctual to his duty. Performs duty honestly and fit for Promotion to next grade.	
4.	2016	V Good	He is well behaved, most reliable, obedient, fit for speedy promotion	
5.	2017	V Good	Mr. Hadi Muhammad is an efficient worker. He is dedicated and pain taking official. Fully deserved to be Promotion to next grades.	
6.	2018	V Good	Mr.Hadi Muhammad is sincere honest trustworthy worker always looking for meeting target.	
7.	2019	V Good	Mr. Hadi Muhammad is experienced in all official matters, fully capable of dealing official correspondence. Have excellent capabilities of learning of dealing superiors.	

Abdullah
ATTESTED

Dur
DIRECTOR YOUTH AFFAIRS

بعد الت جناب سروس ٹریبونل خیر خواہانہ پشاور



ایسٹیبلیشمنٹ 2021ء پنجاب

محمد بادی بنام حکومت خیر خواہانہ
سکریٹری سروس ٹریبونل

موضوعہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام **پشاور** کیلئے **ایبٹ برائے ریٹروسیو**
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند ہے۔

المرقوم 13
ماہ ستمبر 2021

واہ الع

کے لئے منظور ہے۔

بمقام پشاور

RECEIVED
JAN 13 2021

25/01

24/03/2022

7427/21 P-H

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 7427/2021

Hadi Muhammad S/O Dost Muhammad R/O Village Haryan Kot P/O and Tehsil Dargai District Malakand.

.....Appellant

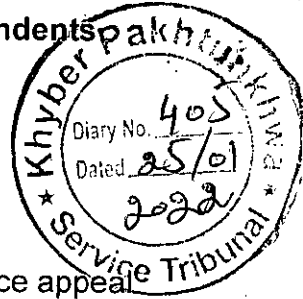
VERSUS

Govt. of KP through Secretary Sports, Culture, Tourism, Youth Affairs, Archeology & Museum Department Khyber Pakhtunkhwa and Others Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 & 2

Respectfully Sheweth:

Preliminary Objections:



1. That the appellant has no cause of action or locus standi to file the instant service appeal and is also estopped by his own conduct to file the instant service appeal in this Hon'ble Tribunal.
2. That the appellant has concealed material facts from this honorable court and hence the Service Appeal is not maintainable on this score alone.
3. That the petition is badly time barred.

FACTS.

1. Pertains to record.
2. Pertains to record.
3. Pertains to record.
4. Pertains to record.
5. Pertains to record.
6. It is correct with further clarification that during the financial year 2018-19, 2020-21 and 2021-22 Government of Khyber Pakhtunkhwa Finance Department created certain posts including the post of Senior Clerk BPS-14 in the Directorate of Youth Affairs, however, the service rules for the same posts were not framed, therefore, amendments in the existing Service Rules, 2017 were proposed and the SSRC in its meeting dated 14-12-2021 approved the amendments in the existing Service Rules 2017 and the Law Department Khyber Pakhtunkhwa accordingly vetted the same vide letter No.REG:1(12)76/360-62 dated 07-01-2022. **(copy attached as annexure-A)**. It is further stated that the Standing Service Rules Committee (SSRC) being a constituted committee covered under Rule-3 (2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 is mandated to recommend the method of appointment and promotion against a post and other conditions related to it accordingly.
7. It is correct with further clarification that after addition of the post of Senior Clerk BPS-14 in the Service Rules, method of recruitment/promotion to the post of Assistant BPS-16 have been changed. Method of recruitment/promotion for the post of Assistant BPS-16 is and under:-

"(a) Fifty (50%) percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with at least five (05) years service as Senior Clerk; and

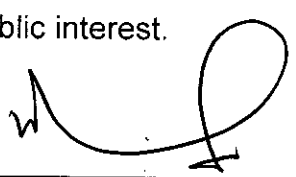
(b) Fifty (50%) percent by initial recruitment."

8. As explained in the preceding paras.
9. As explained in the preceding paras.

GROUND

- A. It is incorrect. The appellants have been treated in accordance with the prevailing rules and regulations. It is further stated that the Standing Service Rules Committee (SSRC) being a constituted committee covered under Rule-3 (2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 is mandated to recommend the method of appointment and promotion against a post and other conditions related to it accordingly.
- B. It is correct with further clarification that after addition of the post of Senior Clerk BPS-14 in the Service Rules, method of recruitment/promotion to the post of Assistant BPS-16 have been changed. Method of recruitment/promotion for the post of Assistant BPS-16 is and under:-
 - (a) Fifty (50%) percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with at least five (05) years service as Senior Clerk; and
 - (b) Fifty (50%) percent by initial recruitment."
- C. Pertains to record.
- D. Pertains to record.
- E. It is correct with further clarification that the Working Papers for promotion to the post of Assistant were processed but in the meanwhile after creation of the post of Senior Clerk BPS-14 and adding of the post of Senior Clerk in the new Service Rules, method of recruitment/promotion to the post of Assistant BPS-16 have been changed. The appellant is Junior Clerk BPS-11 and he will be promoted to the post of Senior Clerk BPS-14.
- F. The respondents may also assist this hon'able court with additional grounds at the time of argument.

In view of the above the instant appeal is not maintainable and without any merit, therefore, the appellant do not deserve any relief as prayed for in this appeal. The instant appeal may be dismissed in the public interest.


Respondent No. 1 _____
Secretary to Govt. Khyber Pakhtunkhwa Sports, Culture and
Youth Affairs Department Khyber Pakhtunkhwa


Respondent No. 2 _____
Director Youth Affairs Khyber Pakhtunkhwa.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 7427/2021

Hadi Muhammad S/O Dost Muhammad R/O Village Haryan Kot P/O and Tehsil Dargai
District Malakand.

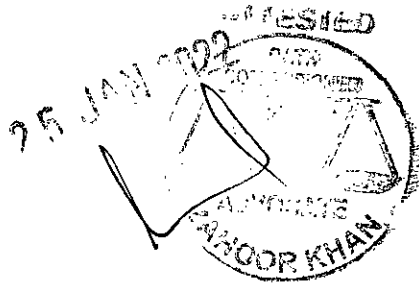
.....Appellant


VERSUS

Govt. of KP through Secretary Sports, Culture, Tourism, Youth Affairs, Archeology &
Museum Department Khyber Pakhtunkhwa and Others Respondents

AFFIDAVIT

I, Naeem Gul Assistant Director (Admn/Litigation), Directorate of Youth Affairs, Khyber Pakhtunkhwa, on the instructions of respondents do hereby solemnly declare and affirm on oath, that the contents of Parawise Comments are correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'ble Court.




Deponent
CNIC No. 17301-5007645-1



**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS AND
HUMAN RIGHTS DEPARTMENT**

WF 40
/360-62

No. REG: 1(12)76
Dated: 07.01.2022.

Sports, Culture, Tourism, Youth Affairs
& Policy & Museums Department
Khyber Pakhtunkhwa
Dairy No: 5
Date: 10 Jan 22

To

The Secretary,
Government of the Khyber Pakhtunkhwa,
Sports, Culture, Tourism, Archaeology, Museums
and Youth Affairs Department.

SUBJECT: MINUTES OF MEETING OF STANDING SERVICE RULES (SSRC) COMMITTEE HELD ON 14-12-2021 UNDER THE CHAIRMANSHIP OF SECRETARY SPORTS & TOURISM DEPARTMENT.

Dear Sir,

I am directed to refer to your Department's letter No. SO(Sports)1-8/SR/2021/2870-74, dated: 23.12.2021, on the subject noted above and to enclose herewith draft Notification, duly vetted and stamped by this Department, for further necessary action.

2. The Administrative Department is advised to examine the draft Notification minutely and to ensure that it is in order and otherwise serves the purpose.
3. Ten printed Gazette copies of the Notifications may be furnished to this Department alongwith the details of the Gazette in which it is published for records of this Department.

AS-11
10/1

Yours faithfully,

**DEPUTY LEGISLATION OFFICER-III
LEGISLATION WING**

ENDT. No. & Date (As Above).

Copy is forwarded for information to:

1. PS to Secretary Law Department.
2. PA to Chief Legislation Officer, Law Department.
3. Master File.

11.1.22

**DEPUTY LEGISLATION OFFICER-III
LEGISLATION WING**

10-1-22

Delivered	
C.P.O	
DS-III	✓
DS-IV	
SO (LIT)	
SO (SAYA)	✓
SO (ARCHY & CUL)	

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GOVERNMENT OF THE KHYBER PAKHTUNKHWA
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS AND YOUTH AFFAIRS DEPARTMENT.

NOTIFICATION

Peshawar, dated the / / 2022

No. _____.- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous Notifications, issued in this behalf the Sports, Tourism, Culture, Archaeology, Museums and Youth Affairs Department in consultation with the Establishment Department and Finance Department hereby lays down the method of 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 in the Directorate of Youth Affairs, Khyber Pakhtunkhwa, specified in Column No. 2 of the said Appendix.

APPENDIX

S. No.	Nomenclature of the post.	Qualification.	Age Limit.	Method of recruitment.
1	2	3	4	5
1.	Director (BPS-19).	---	---	By Promotion, on the basis of seniority-cum- fitness, from amongst the Deputy Directors with at least seven (7) years service as such in BS-18 or twelve (12) years service as such in BS-17 and above, subject to successful completion of Mid-Career Management Course: Provided that if no suitable officer is available for

Deputy Legislation Officer
Department of Khyber Pakhtunkhwa
Law Department

Deputy Legislation Officer,
 Government of Khyber Pakhtunkhwa
 Law Department

				promotion then by transfer from the PMS/PAS officers.
2.	Deputy Director (BPS-18).	---	---	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Assistant Director, District Youth Officer, Budget and Account Officers, Media and Communication Officer and Computer Programmer having at least five (5) years service as such:</p> <p>Provided that if no suitable officer is available for promotion, then by deputation or transfer of a suitable officer from Government Department.</p> <p>Note: For the purpose of promotion a joint seniority list of holders of the posts of Assistant Director, District Youth Officer, Budget and Account Officer, Media and Communication Officer and Computer Programmer shall be maintained.</p>
3.	Assistant Director /District Youth Officer (BPS-17).	At least Second Class Master's Degree or BS (honor) four (4) years in Social Sciences, Management Sciences, Information Technology or its equivalent qualification from a recognized University.	21 to 32 Years.	<p>(a) Seventy (70) percent by promotion, on the basis of seniority-cum-fitness, from amongst holders of the posts of the Computer Operator, Assistant, Senior Scale Stenographer, Accountant, Legal Assistant and Media and Communication Assistant with at least five (05) years service as such:</p> <p>Provided that if no suitable officer is available for promotion, then by deputation or transfer of a suitable officer from the Government and Department; and</p> <p>(b) thirty (30) percent by initial recruitment.</p> <p>Note: For the purpose of promotion a joint seniority list of</p>

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				the holders of the posts of Computer Operator, Assist Senior Scale Stenographer, Accountant, Legal Assistant Media and Communication Assistant shall be maintained.
4.	Budget & Accounts Officer (BPS-17).	At least Second Class Master's Degree or BS (four years) in Business Administration (Finance), Commerce (Accounts) or its equivalent qualification from a recognized University.	22-32 Years.	By initial recruitment.
5.	Computer Programmer (BPS-17).	At least Second Class Master's Degree or its equivalent qualification in Computer Science from a recognized University.	22-35 Years.	By initial recruitment.
6.	Media & Communication Officer (BPS-17).	At least Second Class Master's Degree in Journalism/Mass Communication with at least three (03) years' experience in the relevant field.	22-35 Years.	By initial recruitment.
7.	Assistant (BPS-16).	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University.	20 to 32 years.	(a) Fifty (50%) percent by promotion, on the basis seniority-cum-fitness, from amongst the holders of 1 post of Senior Clerk with at least five (05) years service as such; and (b) fifty (50%) percent by initial recruitment.

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8.	Computer Operator (BPS-16).	(a) At least Second Class Bachelor's Degree in Computer Science / Information Technology (BCS / BIT four years) or its equivalent qualification from a recognized University; or (b) at least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education..	18 to 28 years.	By initial recruitment.
9.	Senior Scale Stenographer (BPS-16).	(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University; (b) a speed of seventy (70) words per minute in shorthand in English and forty five (45) words per minute in typing; and (c) knowledge of computer in using MS Word, MS Excel.	20 to 32 years.	By initial recruitment.

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10.	Accountant (BPS-16).	At least Second Class Bachelor's Degree in Commerce, Business Administration or its equivalent qualification from a recognized University with Diploma in Information Technology from the recognized Board of Technical Education.	20 to 32 years.	By initial recruitment.
11.	Legal Assistant (BPS-16).	At least Second Class LLB Degree or equivalent qualification from a recognized University.	21 to 32 years.	By initial recruitment.
12.	Media & Communication Assistant (BPS-16).	At least Second Class Bachelor's Degree with Journalism/ Mass Communication as a subject or its equivalent qualification from a recognized University.	21 to 32 years.	By initial recruitment.
13.	Senior Clerk (BPS-14).	---	---	By promotion, on the basis of seniority-cum-fitness from amongst the holders of the posts of Junior Clerk, Care Taker, Photographer Telephone Operator, Store Keeper and Receptionist having Intermediate Certificate or its equivalent qualification from a recognized Board and at least two (02) years' service as such: Note: For the purpose of promotion a joint seniority list holder of the posts of Junior Clerk, Care Taker, Photographer, Telephone Operator, Store-Keeper and Receptionist shall be maintained.

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14.	Junior Clerk (BPS-11).	(a) At least Second Division F.A/F.Sc or its equivalent qualification from a recognized Board; and (b) a speed of thirty (30) words per minute in typing and capable to work on Computer in MS Office.	18 to 30 years.	(a) Forty (40%) percent by promotion, on the basis of seniority-cum-fitness, from amongst holders of the posts of Naib Qasid, Chowkidar, Mali, Sweeper, Cook, Generator Operator, Security Guard, Waiter, Tubewell Operator, Dispatch Rider, Electrician, Daftari cum Duplicate Machine Operator and other equivalent posts possessing F.A/F.Sc qualification or its equivalent qualification from a recognized Board with two (2) years service as such; and (b) sixty percent by initial recruitment: Note: A joint seniority list of the holders of the posts of Naib Qasid, Chowkidar, Mali, Sweeper, Cook, Generator Operator, Security Guard, Waiter, Tubewell Operator, Dispatch Rider, Electrician, Daftari cum Duplicate Machine Operator shall be maintained for the purpose of promotion with reference to the dates of appointment or acquiring the F.A/F.Sc qualification, whichever is later: Provided that- (i) If two or more officials have acquired the F.A/F.Sc qualification in the same session, the inter-se-seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and (ii) where a senior official does not possess the requisite qualification at the time of filling up a
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				<p>vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials:</p> <p>Provided further that the condition of F.A/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply till the expiration of the period specified in the second proviso of Column No. 5 against Serial No. 4 of the Establishment Department's amendment Notification No. SOE-IV(E&AD)/1-35/2014, dated: 18.07.2019 to the existing matriculate incumbents of the posts of Naib Qasid, Chowkidar, Mali, Sweepers Cook, Generator Operators, Security Guards, Waiters, Tubewell Operators, Dispatch Riders, Electricians, Daftaris cum Duplicate Machine Operators including holders of the equivalent posts for promotion to the post of Junior Clerk (BPS-11).</p>
15.	Care Taker (BPS-11).	At least Second Class Intermediate Certificate or its equivalent qualification from a recognized Board	18 to 30 Years.	By initial recruitment.
16.	Photographer (BPS-11).	(a) At least Second Division Secondary School Certificate in science or its equivalent qualification from a recognized Board; (b) experience in Still and Movie Photography; and	18 to 30 Years.	By initial recruitment.

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		(c) experience in the operation of Movies and Slide Projectors		
17.	Telephone Operator/ Receptionist (BPS-11).	At least Second-Class Intermediate Certificate or its equivalent qualification from a recognized Board.	18 to 30 Years.	By initial recruitment.
18.	Store Keeper (BPS-11).	At least Second-Class Intermediate certificate or its equivalent qualification from a recognized Board.	18 to 30 Years.	By initial recruitment.
19.	Driver (BPS-06).	Literate having-LTV-driving-license issue by the competent authority. Preference will be given to those who have sufficient experience in driving, repair and maintenance of vehicles.	21 to 35 Years.	By initial recruitment.
20.	Dispatch Rider (BPS-05).	Middle pass. Valid driving License holder and well versed in the traffic rules.	21 to 35 Years.	By initial recruitment.
21.	Electrician (BPS-05).	At least Second Class Secondary School Certificate from a recognized Board in relevant field with two years practical Experience.	21 to 35 Years.	By initial recruitment.
22.	Daftari cum Duplicate Machine Operator (BPS-04).	Middle Pass.	18 to 40 Years.	By initial recruitment.

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23.	Naib Qasid (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.
24.	Generator Operator (BPS-03).	Literate with two (2) years relevant experience.	18 to 40 years.	By initial recruitment.
25.	Cook (BPS-03).	Literate and two (2) year's relevant experience.	18 to 40 years.	By initial recruitment.
26.	Tube well Operator (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.
27.	Chowkidar (BPS-03).	Literate with sound physique.	18 to 40 years.	By initial recruitment.
28.	Security Guard (BPS-03).	Literate with sound physique with two (2) years relevant experience.	18 to 40 years.	By initial recruitment.
29.	Waiter (BPS-03).	Literate with two (2) years relevant experience.	18 to 40 years.	By initial recruitment.
30.	Mali (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.
31.	Sweeper (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.

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Sports, Tourism, Culture, Archaeology, Museums and
Youth Affairs Department.