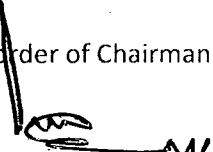


Form- A

## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1356/2022


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 19/09/2022                | <p>The appeal of Mr. Muhammad Asif resubmitted today by Mr. Jalal-ud-Din Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman<br/><br/>REGISTRAR</p> |

The appeal of Mr. Muhammad Asif son of Fazal Wahid Mali Mardan Support Complex received today i.e. on 15.09.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of appointment order and Pay slip mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-D of the appeal is incomplete which may be completed.
- 4- Page nos.10, 15 & 41 of the appeal are illegible which may be replaced by legible/better one.
- 5- One more of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2567 /S.T,

Dt. 16/09 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Jalaluddin Adv. Pesh.

SAR  
19/09/2022 The memorandum of appeal is properly signed, pay slip has been removed/cancelled, Annexure - D regarding appeal in complete form, Page - 15 and 41, Better copy prepared and annexed accordingly and one extra copy of complete appeal is also placed on file, Hence the appeal is re-submitted for finalisation please -

  
Advocate

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No...../2022

1356/2022

**Muhammad Asif**

**VERSUS**

**Govt of Khyber Pukhtunkhwa & others**

**I N D E X**

| <b>S.No</b> | <b>Documents</b>  | <b>Annexure</b>    | <b>Pages</b> |
|-------------|---|--------------------|--------------|
| 1.          | Grounds of Appeal along with affidavit                      |                    | 1-5          |
| 2           | Application for interim relief alongwith affidavit          |                    | 6            |
| 3.          | Addresses of parties  |                    | 7            |
| 4           | Copy of CNIC & Educational testimonial                      | <b>A</b>           | 8-9          |
| 5.          | Copy of appointment letters                                 | <b>B</b>           | 10           |
| 6.          | Copy of Service Structure rules dated 29.04.2019            | <b>C</b>           | 11-14        |
| 7           | Copy of order dated 17.11.2020 of promotion                 | <b>D</b>           | 15           |
| 8.          | Copy of representations                                     | <b>E</b>           | 16           |
| 9.          | Copy of W.P.No.2676/2021 and order dated 28.06.2022         | <b>F &amp; G</b>   | 17-24        |
| 10.         | Copy of Application, dairy No's and letter dated 22.07.2022 | <b>H &amp; H/1</b> | 25-26        |
| 11.         | Copy of orders  | <b>I</b>           | 27-41        |
| 12          | Wakalatnama   |                    | 42           |

**THROUGH**

**APPELLANT**

**JALAL-UD-DIN  
ADVOCATES, HIGH COURT  
PESHAWAR**

**MUHAMMAD ALAM KHAN  
ADVOCATE &**

**REHMAT KUNDI**

**Advocate Peshawar**

**Flat No.16, Second Floor, Al-Syed Plaza, Abdara Chowk  
University Road, Peshawar.**

**Cell # 0333-9216527**

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. <sup>1356</sup>...../2022

**Muhammad Asif** S/o Fazal Wahid as Mali,  
Presently Posted as Mali Mardan Sport Complex,  
R/o Mohallah Wazirabad Mayyar Tehsil and District Mardan.....**APPELLANT**

**VERSUS**

1. Govt of Khyber Pukhtunkhwa  
through Chief Secretary, Civil Secretariat KP Peshawar.
2. **The Secretary** to Government of Khyber Pakhtunkhwa, Ministry of  
Sports and Youth Affairs, Civil Secretariat Peshawar.
3. **The Director General Sports, Khyber Pukhtunkhwa,**  
Directorate of Sports Complex, Peshawar Cantt Peshawar
4. **The Director Youth Affairs,**  
Khyber Pukhtunkhwa, Plot No.28, Sector E-8,  
Phase-VII, Hayatabad Peshawar.....**RESPONDENTS.**

**APPEAL UNDER SECTION 4 OF THE SERVICES TRIBUNAL ACT, 1974,  
AGAINST THE RESPONDENTS, WHEREBY THE APPELLANT HAS NOT  
BEEN PROMOTED TO BPS-11 AND AGAINST THE ILLEGAL ACTION OF  
THE RESPONDENTS, THE APPELLANT FILED WRIT PETITION  
NO.2676/2021 BEFORE THE HON'ABLE PESHAWAR HIGH COURT  
PESHAWAR WHICH HAS BEEN DISPOSED OF WITH THE DIRECTIONS  
TO THE RESPONDENTS TO CONSIDER THE DEPARTMENTAL  
REPRESENTATION OF THE APPELLANT AND DECIDE IN ACCORDANCE  
WITH LAW AND RULES ON THE SUBJECT WITHIN A PERIOD OF TWO  
MONTHS HOWEVER, IF, GRIEVANCE OF THE APPELLANT HAS NOT  
REDRESSED BY THE RESPONDENTS THEN IN THAT EVENTUALLY  
THE APPELLANT MAY APPROACH THE COMPETENT COURT OF LAW  
VIDE JUDGMENT DATED 28.06.2022 BUT DESPITE EXPIRY OF TWO  
MONTHS PERIOD, THE RESPONDENTS FAILED TO DECIDE AND  
COMMUNICATE THE FATE OF THE REPRESENTATION OF THE  
APPELLANT IN THE LIGHT OF THE JUDGMENT/ORDER IN  
W.P.NO.2676/2021, WHICH ACTION OF THE RESPONDENTS ARE  
ILLEGAL, UNLAWFUL AND IN EFFECTIVE UPON THE RIGHT OF THE  
APPELLANT AND THE SAME MAY PLEASE BE DECLARED AS NULL AND  
VOID AND THE APPELLANT MAY PLEASE BE PROMOTED ON THE BASIS  
OF SENIORITY CUM FITNESS IN ACCORDANCE WITH LAW AND RULES,  
REGULATIONS WITH THE ALL BACK BENEFITS.**

**RESPECTFULLY SHEWETH.**

1. That appellant is the Citizens of Pakistan having domiciled of Khyber Pukhtunkhwa and have qualified of F.A. **(Copy of CNIC & educational testimonial are annexed as A).**
2. That the appellant was initially appointed as class-IV Mali on 05.09.2009, in the Directorate of Sports Khyber Pukhtunkhwa, Haripur Sports Complex and during the services, the appellant has improved his qualification as mentioned above. **(Copy of appointment letters/pay slip of appellant is annexed as B).**

3. That since the appointment of the appellant, he is working as member and staff of Directorate of Sports, which is under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar.
4. That the Government of Khyber Pukhtunkhwa, Sports, Tourism, Archaeology and Youth Affairs department through a Notification Bering No.SO(Sports)1-8/2019/S.Rule dated 29.04.2019, notified rules of the method of recruitment, qualifications and other conditions specified in Column No.3 to 5 of the appendix to the notification, applicable to the posts in the Directorate General of Sports, as specified in column No.2 of the said appendix. **(Copy of the Services structure rules of the Directorate Of Sports is annexed as C).**
5. That the Directorate of Youth Affairs, who is also under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar, and governed under the same rules/services. Structure have promoted class-IV employees of the Directorate to the post of Junior Clerk (BPS-11) on regular basis with immediate effect vide office order No.DYA/ Admin/promotion /2020/1635-38 dated 17.11.2020. **(Copy of the order dated 17.11.2020 of promotion is annexed as D).**
6. That the appellant being also beneficial from the said rules/services structure for promotion of class-IV employees, has also submitted his joint representation to the respondents/DG Sports Khyber Pukhtunkhwa on dated 29.01.2021 but no response and no fruitful result. **(Copy of the representation are annexed as E).**
7. That thereafter, the appellant filed Writ Petition No.2676-P/2021 before the Hon'able Peshawar High Court Peshawar, wherein notices were issued to the respondents for filing of their written comments, hence after filing of comments, the Hon'able Peshawar High Court Peshawar hard the parties and disposed off the Writ Petition with the directions to the respondents to decide the appellant and others representation in accordance with law and rules on the subject within a period of two months from the date of receipt of the copy of this order, however, if grievance of the appellant is not redressed by the respondents then in that eventuality, he may approach the competent Court of law vide order and Judgment dated 28.06.2022. **(Copy of the Grounds of W.P.No.2676-P/2021 and order dated 28.06.2022 is annexed as F & G).**
8. That the order and Judgment dated 28.06.2022 of the Hon'able Peshawar High Court Peshawar has been submitted by the appellant alongwith other through joint application to the respondent No.3 through dairy No.357-17/QSL-class-IV dated 05.07.2022 and the same has been forwarded to the competent authority by the respondents on 22.07.2022 but despite lapsed of stipulated period of two months, the respondents failed to decide the fate of the representation of the appellant as per directions in the Judgment and order dated 28.06.2022 of Hon'able Peshawar High Court Peshawar. **(Copy of application dated 05.07.2022, dairy receiving No and letter dated 22.07.2022 are annexed as H to H/1).**
9. That the appellant being aggrieved from the non-consideration of the representation in the light of Judgment and order of Hon'able Peshawar High Court, Peshawar and by not promoting the appellant by the respondents, the appellant is approached this Hon'able Tribunal on the following ground inter alia:-

## GRUNDS :-

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- a. That the action and inaction of the respondents for not considering the appellant for promotion on the basis of seniority as well as not to decide the departmental representation in the light of the directions of the Hon'able Peshawar High Court Peshawar within stipulated period of two months, is void-ab-initio, arbitrary, without jurisdiction, Coram-non-judice, illegal and without any lawful authority hence untenable in eye of law and the appellant is liable to be promoted on the basis on seniority and qualification under the rules with all back benefits.
- b. That the appellant having the accrued right for promotion on the basis of seniority to junior clerks BPS-11 in the light of Doctrine accrued rights and legitimate expectancy but the said rights have been violated by the respondents and the appellant has been deprived from the said rights hence the appellant is entitled for the secured and guaranteed rights in accordance with rules dated 29.04.2019.
- c. That appellant has been deprived from the legal rights which are clear violation of Article 4 of Constitution of the Islamic republic of Pakistan 1973.
- d. That the Directorate of Youth Affairs vide order date 17.11.2020 has promoted similarly placed class-IV employees from BPS-3 to BPS-11 as per services structure rules which is meant for staff of both the directorate but the respondent/directorate of Sports despite verbal as well as written representations has deprived the appellant from their fundamental and Constitutional rights as guaranteed in the Constitution of Islamic republic of Pakistan 1973.
- e. That respondent/Director of Youth Affairs is under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs department, Civil Secretariat, Peshawar and the services structure / rules is also applicable to the staff of both the Directorates but the respondent No.3/Director General Sports violating the same by not considering the appellant under the quota meant for promotion from class-IV to Junior Clerk-BPS-11 and thus the appellant is being discriminated.
- f. That as per rules dated 29.04.2019, the appellant having the requisite qualifications and experience for the posts of junior clerk BPS-11 and non-considering of the case for promotion is in utter disregard of law, rules, regulations and service structure as well.
- g. That the law and rules guarantees equal treatment but the appellant being at par with and similarly placed employees of the Directorate of Youth Affairs, has been discriminated. Reliance is placed on **2009 SCMR page-1**.
- h. That Article-4 of the Constitution of Islamic Republic of Pakistan 1973, commands that all the citizens without any discrimination shall be dealt in accordance with the law and rules, so enforcement of the law leaves no room for creating any distinction or discrimination between the citizen who having equal footing.
- i. That Article-4 and 8 of the Constitution of Islamic Republic of Pakistan 1973, makes it clear that deviation from law has not to be countenanced, this is an assurance to the people of Pakistan that people of authority shall treat them in accordance with law and each one is bound by these stipulations of the Constitution of Islamic Republic of Pakistan, 1973.
- j. That by not promoting the appellant is also in utter violation of Article-25 of the Constitution of Islamic Republic of Pakistan 1973.

- (4)
- k. That the functions and nature of job / work of the appellant is at par with other employees of the Directorate of Youth Affairs, which is under the control of one and the same Ministries of Sports, Culture, Tourism, Archaeology and Youth Affairs department, is clear discrimination on one hand and on the other hand is clear violation of the provision of the Constitution of Islamic Republic of Pakistan 1973 and rule applicable to the matter of the appellant.
- l. That under the same rules dated 29.04.2019, the respondents-department had fulfilled 67% of initial recruitment quota and on the other hand, the promotion of the appellant of 33% has been delayed and refused by not deciding the representation of the appellant which clear violation of the law and rules hence the appellant is also discriminated on this score alone.  
**(Copy of the order annexed as I).**
- m. That under section 21 and section 24-A of the General Clauses Act, once a rights has been extended and created to the individual through a proper manner by the competent authority, then no one has power to undo it, and on this score alone, the appellant is entitled for the promotion as per rules on the basis of seniority cum fitness to Junior Clerk BPS-11 with all back benefit.
- n. That the respondents by not promoting the appellant on the basis of seniority cum fitness is also against the norms of natural justice and fair play and of directions of the apex Court in different judgments and the respondents have make mockery of his policy by itself as well as the rules on the subject matter.
- o. That in the peculiar facts and circumstances of the case, the interference of this Hon'able Tribunal is warranted under the Law.
- p. That any other ground would be adduced by Appellant during arguments on the instant appeal with the permission of this Hon' able Tribunal.

***It is, therefore, most humbly prayed that on acceptance of this appeal:-***

- 1. Non-Consideration of the appellant for promotion for on basis of seniority cum fitness to Junior Clerk BPS-11 in accordance with the services structure rules is in utter violation of law, rules, regulations, fundamental rights and Constitution of Islamic Republic of Pakistan, 1973 and may please be declared as such.***
- 2. Appropriate directions may kindly be issued to the respondents-department to treat the appellant at par with the employees of the Directorate of Youth Affairs, who, are similar with the appellant and are already promoted under the same service structure rules, under the control of one and the same Ministry and Governed under the same rules, regulations and same service structure rules.***
- 3. Appropriate directions may kindly be issued to the respondents-department to promote the appellant to BPS-11 in view of service structure rules and notification dated 29.04.2019 as the Appellant having the requisite qualification and experience for the promotion to BPS-11 on the basis of Seniority Cum fitness with all back benefits.***

5

4. Any other relief which is deem proper and not specifically asked by the Appellants may be pleased be granted to the Appellant in the circumstances.

THROUGH

APPELLANT

*Jalalud Din*

JALAL-UD-DIN  
ADVOCATES, HIGH COURT  
PESHAWAR

*Muhammad Alam Khan*  
MUHAMMAD ALAM KHAN  
ADVOCATE &

*Rehmat Kundi*  
REHMAT KUNDI  
Advocate Peshawar

**AFFIDAVIT:-**

I, **Muhammad Asif** S/o Fazal Wahid as Mali, Presently Posted as Mali Mardan Sport Complex, R/o Mohallah Wazirabad Mayyar Tehsil and District Mardan do hereby solemnly affirm and declare on Oath that the contents of the instant services appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon' able Tribunal.

*Muhammad Asif*

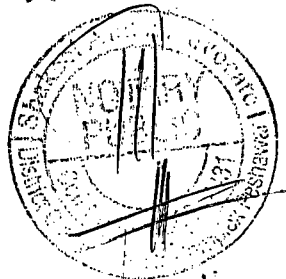
DEPONENT

IDENTIFY BY

*Jalalud Din*

JALAL-UD-DIN  
Advocate

ATTESTED



14/09/22



**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

C.M.No...../2022  
In  
Service Appeal No...../2022

Muhammad Asif

6

**VERSUS**

**Govt of Khyber Pukhtunkhwa & others**

**APPLICATION FOR INTERIM RELIEF TO THE EFFECT THAT THE RESPONDENTS ARE DIRECTED NOT TO TAKE ANY ADVERSE ACTIONS AGAINST THE APPLICANT/APPELLANT AND ALSO NOT FILL UP THE VACANT POSTS TILL DECISION OF THE MAIN SERVICES APPEAL.**

**RESPECTFULLY SHEWETH:-**

1. That the above titled appeal has been filed before this Hon'able Tribunal and yet no date of hearing has been fixed.
2. That the contents of the main appeal be considered as integral part of the instant application because the applicant/appellant have a good prima facie case and sanguine about his success of the appeal.
3. That balance of convenience and inconvenience also lies in favor of applicant/appellant.
4. That if, the temporary injunctions has not been granted to the applicants, then the applicant will suffer irreparable loss.

It is, therefore, most humbly prayed that, on acceptance of this application, the interim relief as prayed in the heading of the instant application may please be granted in favor of the applicant/appellant against the respondents till decision of the main appeal.

**THROUGH**

**APPLICANT**

*Jalal-ud-Din*

**JALAL-UD-DIN**

**ADVOCATES, HIGH COURT**

*Muhammad Alam Khan*  
**MUHAMMAD ALAM KHAN**  
**ADVOCATE &**

*Rehmat Kundi*  
**REHMAT KUNDI**  
**Advocate Peshawar**

**AFFIDAVIT:-**

I, **Muhammad Asif** S/o Fazal Wahid as Mali, Presently Posted as Mali Mardan Sport Complex, R/o Mohallah Wazirabad Mayyar Tehsil and District Mardan do hereby solemnly affirm and declare on Oath that the contents of the instant services application are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon' able Tribunal.

*Muhammad Asif*  
**DEPONENT**

**IDENTIFY BY**

*Jalal-ud-Din*

**JALAL-UD-DIN**

**Advocate HIGH COURT**

**PESHAWAR**

**ATTENDED**  
*Muhammad Asif*  
**MUHAMMAD ASIF**  
**Advocate Peshawar**  
14/08/2022

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

**Service Appeal No...../2022**

**Muhammad Asif**

**VERSUS**

**Govt of Khyber Pukhtunkhwa & others**

7

**ADDRESSES OF PARTIES**

**APPELLANT.**

**Muhammad Asif S/o Fazal Wahid as Mali,**  
Presently Posted as Mali Mardan Sport Complex,  
R/o Mohallah Wazirabad Mayyar Tehsil and District Mardan

**RESPONDENTS.**

1. Govt of Khyber Pukhtunkhwa  
through Chief Secretary, Civil Secretariat KP Peshawar.
2. **The Secretary** to Government of Khyber Pakhtunkhwa, Ministry of  
Sports and Youth Affairs, Civil Secretariat Peshawar.
3. **The Director General Sports, Khyber Pukhtunkhwa,**  
Directorate of Sports Complex, Peshawar Cantt Peshawar
4. **The Director Youth Affairs,**  
Khyber Pukhtunkhwa, Plot No.28, Sector E-8, Phase-VII, Hayatabad  
Peshawar

**THROUGH**

**APPELLANT**

*Jalal-ud-Din*

**JALAL-UD-DIN  
ADVOCATES, HIGH COURT  
PESHAWAR**

**MUHAMMAD ALAM KHAN  
ADVOCATE &**

**REHMAT KUNDI  
Advocate Peshawar**

8

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Amir - A



ASIF

دستخط حامل کارڈ

حکومت پاکستان

قومی شناختی کارڈ

16101-4639656-5

نام: محمد آصف

جنس: مرد

والد کا نام: فضل واحد

شناختی علامت: گئے پر عمل

تاریخ پیدائش: 05/01/1974

امتیاز ناچر

دستخط جسٹس آر جنرل



خانہ ان نمبر: UW9K3R

شناختی نمبر: 16101-4639656-5

موجودہ پتہ: محلہ وزیر آباد، ضلع، تحصیل و ضلع مردان

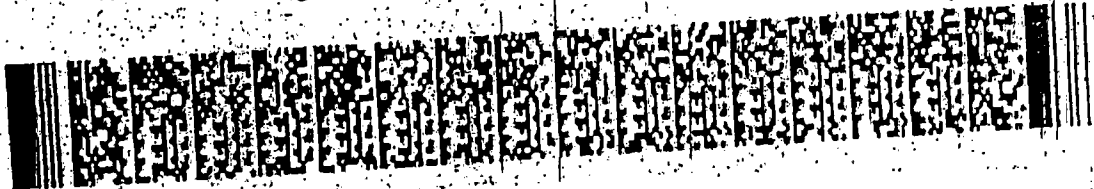
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مستقل پتہ: ایف

تاریخ ترمیم: 13/11/2024

تاریخ اجراء: 13/11/2014

گنڈہ کارڈ لے پر ترمیمی ایئر ٹیکس میں ڈال دیں



Roll No. 176181

Serial No. 251920

**Board of Intermediate and Secondary Education**  
Peshawar  
Higher Pakhtunkhwa Pakistan



*Annex-A-6*

**Higher Secondary School Certificate Examination**

(HUMANITIES GROUP)

SESSION 1996 - ANNUAL

Certified that Muhammad Asif

Son/Daughter of Fazli Wahid

Resident of Mardan District

Passed the Intermediate Examination of the Board of Intermediate & Secondary Education

Peshawar held in June, 1996 as a Private student. He/She obtained 469 marks

Out of 1100 and has been placed in Grade D representing Fair

Registration No. 12923-B/P-95



*Attested*  
*Muhammad Arif*  
MUHAMMAD ARIF  
SECRETARY  
B.I.S.E. PESHAWAR

*[Signature]*  
Asst. Secretary

**ATTESTED**  
*[Signature]*  
Secretary

This certificate is issued without alteration or erasure.

10

Annexed

29  
B/7


Office of the District Coordination Officer, Mardan  
District Coordination Officer, Mardan

TERMS

Subject: Mr. Muhammad A. Khan (M.A. Khan) for the recommendation of Departmental Mardan is hereby appointed as a Multi Sport Complex Mardan under the control of District Coordination Officer, Office Mardan with usual allowance, as admissible under the rules in immediate effect, on the terms and conditions mentioned below:-

- i)- He will for all intents and purposes, be Civil Servant except for purpose of pension or gratuity. In lieu of pension and gratuity, he will be entitled to receive such amount contributed by him towards Contributory Provident Fund (C.P.F) along with the contributions made by Govt. to his account in the said fund, in the prescribed manner.
- ii)- He will be governed by the Civil Servants Act 1973, all the laws applicable to the Civil Servant and Rules made there-under.
- iii)- He will initially, be on probation for a period of one year extendable for a further period up to another year.
- iv)- His service will be liable to termination at any time without assigning any reason thereof before the expiry of the period of probation, if his work during this period is not found satisfactory. In such an event, he will be given a month's notice of termination from service or one month's pay in lieu thereof. In case he wishes to resign at any time, a month's notice shall be necessary or in lieu thereof a month's pay shall be forfeited.
- v)- He will produce medical fitness certificate from the Medical Superintendent, DHO Hospital Mardan, as required under the Rules.

If the above terms and conditions of appointment are acceptable to him He should report for duty to the District Coordination Officer, Mardan office within 14 days against the existing vacancy.

  
District Coordination Officer,  
Mardan

8617-19 DCO/MR

Copy for information and necessary action:

- 1- Comptroller District Accounts Mardan
- 2- District Sport Officer, Mardan.
- 2- Office Concerned



11



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

Dated Peshawar, the 29/04/2019

NOTIFICATION

Amended - C

No.SO(Sports)1-8/2019/S.Rules :- 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, and in supersession of all previous Notifications, issued in this behalf, the Sports, Culture, Tourism, Youth Affairs, Archaeology and Museums Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in Column Nos. 3 to 5 of the Appendix to this Notification, which shall be applicable to the posts in the Directorate General of Sports, as specified in Column No. 2 of the said Appendix:

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 General (BPS-20). | -   | -          | By promotion, on the basis of seniority-cum-fitness, from amongst the Directors (BPS-19), having two (2) years' service in BPS-19 and seventeen (17) years service in BPS-17 and above:<br><br>Provided that if no suitable officer is available for promotion then by transfer from amongst the PAS/PMS/PCS officers. |

*W. Nawaz  
29.04.2019  
Sports*

12

|     |                        |  |                 |  |
|-----|------------------------|--|-----------------|--|
| 18. | Supervisor (BPS-15).   | At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board, with Junior Diploma in Physical Education.  | 20 to 32 years. | (a) Ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Hostel Superintendents (BPS-10) with three (03) years service as such; and<br>(b) ninety per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Caretakers (BPS-08) and Store Keepers (BPS-08) with two (02) years service as such.<br><br>Note: For the purpose of promotion, a joint seniority list of Care Takers and Store Keepers shall be maintained. |
| 19. | Stenographer (BPS-14). | (a) At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with-<br>(b) speed of fifty (50) words per minute in shorthand in English and thirty-five (35) words per minute in typing; and<br>(c) knowledge of Computer in using MS Word and MS Excel. | 18 to 30 years. | By initial recruitment.  |
| 20. | Senior Clerk (BPS-14). |  |                 | By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks (BPS-11) with at least two years' service as such.   |
| 21. | Junior Clerk (BPS-11). | At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with a speed of thirty (30) words per minute in typing.  | 18 to 30 years. | (a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids (BPS-03), Chowkidars (BPS-03), Security Guards (BPS-03), Watchmen (BPS-03), Malies (BPS-03), Ground-men (BPS-03), Cleaners (BPS-03), Conductors (BPS-03), including holders of other equivalent posts in the Directorate General of Sports   |

~~MAKAR~~  
19.04.2019  
S.A. NAVA-2

13

|     |  |  |                 |   |
|-----|--|--|-----------------|---|
|     |  |  |                 | <p>having at least two years' service as such who have passed Intermediate Examination; and</p> <p>(b) sixty-seven per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, a joint seniority list of Naib Qasids, Chowkidars, Security Guards, Watchmen, Malies, Ground-men, Cleaners, Conductors, including holders of other equivalent posts in the Directorate General of Sports shall be maintained:</p> <p>Provided that if two or more officials have acquired the Intermediate Certificate 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 where a senior official does not possess the requisite qualification at the time of filling of a 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 where a senior official does not possess the requisite qualification at the time of filing of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p> |
| 22. | Junior Squash Coach/Junior Coach (BPS-10). | At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board, with three (3) years' experience as Coach in the relevant games before or after Secondary School Certificate; and | 25 to 40 years. | By initial recruitment.   |

*Wajahat*  
*29.04.2019*  
*58510 Nawaz*



|     |                     |                      |                 |                         |
|-----|---------------------|----------------------|-----------------|-------------------------|
| 33. | Conductor (BPS-03). | Preferably literate. |                 |                         |
| 34. | Sweeper (BPS-03).   | Literate.            | 18 to 40 years. | By initial recruitment. |
|     |                     |                      | 18 to 40 years. | By initial recruitment. |


Endst: No. No.SO(Sports)1-8/2019/S.Rules:

Copy forwarded to the:-

- 1) All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 2) Secretary to Governor Khyber Pakhtunkhwa.
- 3) Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
- 4) Accountant General Khyber Pakhtunkhwa.
- 5) Director General Sports, Khyber Pakhtunkhwa Peshawar.
- 6) Secretary Public Service Commission Khyber Pakhtunkhwa Peshawar.
- 7) Registrar Peshawar High Court / Service Tribunal Peshawar.
- 8) All Regional Sports Officers / District Sports Officers. Khyber Pakhtunkhwa.
- 9) Manager Government Stationary & Printing Department.
- 10) PS to Chief Secretary Khyber Pakhtunkhwa Province.
- 11) PS to Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 12) PA to Additional Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 13) Office Order File.

sd/x  
Secretary to Government of Khyber Pakhtunkhwa  
Sports, Tourism, Archaeology, Museums &  
Youth Affairs Department

Dated Peshawar. the 29/04/2019

  
29-04-2019  
(Sajid Nawaz)  
Section Officer Sports

15



**DIRECTORATE OF YOUTH AFFAIRS**  
**KHYBER PAKHTUNKHWA**  
Plot No.28 Sector E-8 Phase-VII Hayatabad, Peshawar  
Dated Peshawar, the 17<sup>th</sup> November, 2020

Amended

**OFFICE ORDER:**

No. DYA/Admn/Promotion/2020/1635-38  
Consequent upon the recommendation of the Departmental Promotion Committee the following Class-IV (BPS-03) of this Directorate are hereby promoted to the post of Junior Clerk (BPS-11) on regular basis with immediate effect.

| S.# | Name of Incumbent |
|-----|-------------------|
| 1.  | Asif Ullah        |
| 2   | Faiz Ullah        |
| 3   | Hidayat Ullah     |
| 4.  | Naveed Alam       |
| 5   | Umair Khan        |
| 6   | Qadeer Khan       |
| 7   | Nazir Yousaf      |

On their promotion, they are hereby posted/transferred against the vacant post of Junior Clerk (BPS-11) at the station noted against them in the interest of public service

| S.# | NAME OF INCUMBENT  | PLACEMENT   |
|-----|--|---|
| 1   | Mr Asif Ullah<br>Mali (BPS-03)<br>District Youth Office Tank                 | Junior Clerk (BPS-11), at District Youth Office Tank against the vacant post.         |
| 2   | Mr Faiz Ullah<br>Mali (BPS-03)<br>District Youth Office, Karak               | Junior Clerk (BPS-11), at District Youth Office Karak against the vacant post         |
| 3   | Mr Hidayat Ullah<br>Chowkidar (BPS-03)<br>District Youth Office Lakki Marwat | Junior Clerk (BPS-11), at District Youth Office Bannu against the vacant post         |
| 4   | Mr Naveed Alam<br>Mali (BPS-03)<br>District Youth Office Lakki Marwat        | Junior Clerk (BPS-11), at District Youth Office Lakki Marwat against the vacant post. |
| 5   | Mr. Umair Khan<br>Mali (BPS-03)<br>District Youth Office, Charsadda          | Junior Clerk (BPS-11), at District Youth Office Charsadda against the vacant post     |
| 6   | Qadeer Khan<br>Naib Qasid (BPS-03)<br>District Youth Office, Nowshera        | Junior Clerk (BPS-11), at District Youth Office Nowshera against the vacant post.     |
| 7   | Nazir Yousaf,<br>Chowkidar (BPS-03)<br>District Youth Office, Chitral        | Junior Clerk (BPS-11), at District Youth Office Chitral against the vacant post       |

Note: -Promotion of the official is also subject to the following terms and conditions  
They will be on probation for a period of one year in terms of Section 6 (2) of the

Khyber, Pakhtunkhwa Civil Servants Act 1973 read with Rules-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment Promotion)

**TESTED**

بخدمت جناب ڈی جی سپورٹس خیبر پختون خواہ پشاور

16

عنوان: درخواست برائے پرموشن بطور جونیئر کلرک

D.No. 86 - 11/Permeation  
Date: 29-1-21  
Directorate General of Sports  
KPK Peshawar Cantt

(Amir F) Amended-E  
جناب عالی!

مؤدبانہ التماس ہے کہ ہم جگہ ملازمین درجہ چہارم  
ٹائٹ قاعدہ / مالی / چوکیدار آپ صاحبان کی خدمت میں عرض  
کرا رہے ہیں کہ ہم لوگوں کے مورفہ 06/06/2019 کو ایک درخواست آپ  
صاحبان کی خدمت میں پیش کی تھی اس کے بعد دوسری درخواست مورفہ  
04/03/2020 کو لکھی گئی تھی اس کے بعد یہ تیسری درخواست آپ کی خدمت میں  
پیش کی جا رہی ہے لیکن یہ قسمتی ہے اس التجا پر منظور نہیں کیا جا رہا  
جبکہ وہ سے ہم زبانی اذیت کا شکار ہیں کہ ہماری پرموشن کی جائے  
اس سلسلے میں ہماری آپ صاحبان سے ایک مرتبہ پھر التجا ہے  
کہ یہ پرموشن نیٹ سروس رولز کے تحت کر کے مشکور فرمائیں  
تا کہ درجہ چہارم کے ہمارے سب بھائیوں کا کام جلدی ہو جائے آپ  
صاحبان سے گزارش ہے کہ ہماری اس التجا پر منظور فرمائیں۔  
آپ کی عین نوازش ہوگی۔

الغرض

- 1) نعیم اکبر
- 2) عامر شہزاد
- 3) محمد آصف
- 4) محمد ساجد
- 5) امجد فرید
- 6) محمد بلال
- 7) نثار احمد
- 8) ملنگ جان
- 9) برکت اللہ
- 10) عثمان شاہ
- 11) ضیاء الرحمن
- 12) محمد بلال
- 13) نگر شاد
- 14) محمد ذوالفقار
- 15) محمد علی

17

1



BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

W.P No. 2676 P of 2021 .

Annexed - F

1. Mr. Zia Ur Rehman S/O Aziz Ur Rehman as Mali.
2. Mr. Usman Shah S/O Rahat Shah as Chokidar.
3. Mr. Malang Jan S/O Bakhtiar Khan as Mali.
4. Mr. Muhammad Saleem S/O Bayaz Khan as Mali.
5. Mr. Aamir Shahzad S/O Muhammad Arif as Watchman.
6. Mr. Barakat Ullah S/O Muhammad Zaman as Mali.
7. Mr. Muhammad Bilal S/O Muhammad Basheer as Mali.
8. Mr. Muhammad Asif S/O Fazal Wahid as Mali.
9. Mr. Nisar Ahmad S/O Mir Zarkam Shah as Chowkidar.
10. Mr. Muhammad Sajid S/O Aziz Ur Rehman as Mali.
11. Mr. Amjid Farid S/O Siraj ud Din as Chowkidar.
12. Mr. Muhammad Bilal S/O Muhammad Yaseen as Naib Qasid.
13. Naeem Akbar S/O Saleem Akbar as Mali.

All employees / members of Directorate of Sports Khyber Pakhtunkhwa,  
Peshawar Sports Complex, Peshawar

.....PETITIONERS

VERSUS

1. The Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Ministry of Sports and Youth Affairs, Civil Secretariat, Peshawar.
3. Director General Sports, Directorate of Sports Khyber Pakhtunkhwa, Peshawar Sports Complex, Peshawar Cantt, Peshawar.
4. Director Youth Affairs, Khyber Pakhtunkhwa, Plot No. 28, Sector E - 8, Phase VII, Hayatabad, Peshawar

..... RESPONDENTS -

Registrar  
2021

WRIT PETITION UNDER ARTICLE  
199 OF THE CONSTITUTION OF

ATTESTED  
EXAMINER  
Peshawar High Court

(2)

(18)

ISLAMIC REPUBLIC OF  
PAKISTAN, 1973.

---

**Respectfully Sheweth:**

*The petitioners submit as under,*

1. That the petitioners are the citizens of Pakistan, domiciled of KPK, have the qualification of SSC, F.A/F.Sc etc have been appointed as class IV in the years 2007, 2008, 2009 and 2010 in the directorate of sports Khyber Pakhtunkhwa, Peshawar Sports Complex, Peshawar Cantt, Peshawar. Some of the petitioners have improved their qualification during their service. (Copy of testimonials and appointments orders are annexed as Annexure A/ A\_\_\_ And B/B\_\_\_)
2. That since the appointment of the petitioners, they are working as members and staff of directorate of sports which is under the control of Ministry Of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar.
3. That the Government of Khyer Pakhtunkhwa, Sport, Toursim, Archeology, Museum and Youth Affairs Department, through Notification bearing NO. SO(Sports) 1 – 8 / 2019 / S. Rules dated 29/04/2019 notified rules of the method of recruitment, qualifications and other conditions specified in column NO 3 to 5 of the appendix to the notification, applicable to the posts in the Directorate General of Sports, as specified in Column No 2 of the said appendix. (Copy of the rules / service structure of the Directorate General Sports is annexed as C)

RE-FILED TODAY  
Deputy Registrar  
28 JUN 2021

ATTESTED  
EXAMINER  
Peshawar High Court

3

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4. That the Directorate of Youth Affairs, who is under the control of Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar, and governed under the same rules / service structure (annexure C) have promoted class IV employees of the Directorate to the post of Junior Clerk (BPS 11) on regular basis with immediate effect vide office order No. DYA/Admin/Promotion/2020/1635-38 dated 17/11/2020. (copy of the office order is Annexure D)
5. that the petitioners have also submitted their joint representation to the respondents / DG Sport Khyber Pakhtunkhwa dated 29/01/2021 but no response till now. (copy of the representation is annexed as E)
6. That the petitioners having no other adequate remedy, invoke the constitutional jurisdiction of this honourable court for appropriate writ / direction for the relief / prayers on the following grounds inter alia;

**GROUND**

- A. That it is constitutional duty of each and every authority in Pakistan to exercise its power fairly, justly and transparently but the respondents have the same.
- B. That the Director Youth Affairs vide office order (Annexure E) has promoted similarly placed Class IV from BPS 3 to BPS 11 as per service structure (Annexure D) which is meant for staff of both the directorates but the respondent / Director Sports despite several verbal requests as well as written applications has deprived the petitioner from their fundamental and constitutional rights as guaranteed in Chapter I of Part II of the Constitution of Islamic Republic of Pakistan, 1973.

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Deputy Registrar

28 JUN 2021

ATTESTED  
EXAMINER  
Peshawar High Court

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C. That respondent / Directorate Youth Affairs is under the control of Ministry Sports, Culture, Tourism, Archaeology and Youth Affairs Department, Civil Secretariat, Peshawar and the service structure / rules (Annexure D) is also applicable to the staff of both the directorates but the respondent / Directorate General Sports violating the same by not considering the petitioners under the quota meant for promotion from class IV to Junior Clerk (BPS 11) and thus the petitioners are being discriminated.

D. That the petitioners are qualified, having the requisite qualifications and experience for the posts of Junior Clerk (BPS 11) and non consideration of their case and not promoting them to the post of BPS 11, is in utter violation of the law, rules, regulations and service structure.

E. That the Constitution guarantees equal treatment but the petitioner being at par with and similarly placed employees of the Directorate Youth Affairs, have been discriminated.

F. That Article-4 of the constitution of Islamic Republic of Pakistan, 1973, commands that all the citizens without any discrimination shall be dealt in accordance with the law, so enforcement of the law leaves no room for creating any distinction or discrimination between the citizens.

G. That Articles-4 & 8 of the constitution of Islamic Republic of Pakistan, 1973, makes it clear that deviation from law has not to be countenanced: this is an assurance to the people of Pakistan that people in authority shall treat them in accordance with law and each one is bound by these stipulations of the constitution of Islamic Republic of Pakistan, 1973.

That the action and inactions of respondents / Department is also in utter violation of Article-25 of the constitution of Islamic Republic of Pakistan, 1973.

FILED TODAY  
ATTESTED  
Deputy Registrar EXAMINER  
Peshawar High Court  
24 JUN 2021

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- I. That the function and nature of job / work of the petitioners is at par with other employees of Directorate of Youth Affairs, which is under the control of one and the same Ministry of Sports, Culture, Tourism, Archaeology and Youth Affairs Department, is clear discrimination on one hand and on the other hand is clear violation of the provision of Constitution of Islamic Republic of Pakistan, 1973.
- J. That any, additional ground, with leave of the honourable court, will be argued at the time of final hearing of the petition.

Prayer:

It is, therefore, humbly requested that on acceptance of this writ

petition:-

- i) Non consideration of the Petitioners for promotion to BPS 11 in accordance with the service structure (annexure D), is in utter violation of the law, rules, regulations, fundamental rights and Constitution of Islamic Republic of Pakistan, 1973 may please be declared as such.
- ii) Appropriate writ / direction to the respondent / department to treat the petitioner at par with the employees of the Directorate Youth Affairs, who, are like the petitioners, under the control of one and the same Ministry and governed under the same rules, regulations and service structure.
- iii) An appropriate writ / direction to the respondent / department to promote the petitioners to BPS 11 in view of Service structure as the petitioners having the requisite qualifications / experience.
- iv) That any other direction / writ, deem appropriate by this honourable court, in fact and circumstance of the case, may also be granted in favor of petitioners against respondents / departments.

DULAY  
Magistrate  
1/2021

**ATTESTED**  
EXAMINER  
Peshawar High Court



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**INTERIM RELIEF:**

In the meanwhile, by way of interim relief, respondents be directed not to take any adverse action against the petitioners.

The petitioners also pray for any other relief as this honourable court deems fit and appropriate to grant in the interest of justice in the circumstances of the case.

Through,

Petitioners

  
Muhammad Anwar

  
Inamullah Alizai

  
Wahid Khan Khalil

  
Afshan Hussain

Advocates High Courts

Dated: June 24, 2021.

List of Books / laws:

- The Constitution of Islamic Republic of Pakistan, 1973.
- Service Laws
- Service Structure of Directorate General of Sports, KPK.
- Relevant law / book.

  
ADVOCATE

**FILED TODAY**  
Deputy Registrar

24 JUN 2021

**ATTESTED**  
EXAMINER  
Peshawar High Court

7

23

**BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR**

W.P No: 26767 of 2021

Mr. Zia Ur Rehman & Others


VERSUS


Govt of Khyber Pakhtunkhwa & Others

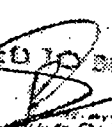
**AFFIDAVIT**


I, Zia Ur Rehman S/O Aziz Ur Rehman R/O Prang, YaseenZai, Charsadda, do hereby solemnly affirm and declare on oath that the contents of the Writ Petition are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

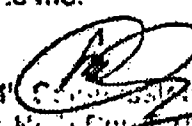
Identified by:

  
Amullah Alizai  
Advocate, Peshawar

  
**DEPONENT**  
CNIC: 17101-8535123-1 ✓  
Cell No: 0315-9989118

  
Court Officer  
Peshawar High Court, Peshawar  
Peshawar, Khyber Pakhtunkhwa  
The Peshawar Bench Order 27

FILED   
Deputy Registrar  
24 JUN 2021

|   |             |
|---|-------------|
| No. <u>28692</u><br>Certified that the above was verified on solemnly affirmation before me on this <u>16</u> day of <u>June</u> <u>2021</u> at <u>Zia ur Rehman s/o Aziz ur Rehman Charsadda</u> who was identified by <u>Amullah Alizai</u> who is present at the time.<br>Officer <br>Peshawar High Court, Peshawar. | 04 JUL 2022 |
|---|-------------|

At a distance verified 18/06/2021

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**PESHAWAR HIGH COURT PESHAWAR  
ORDER SHEET**

*Annexed-6*

| Date of Order or Proceedings<br>1 | Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary<br>2  |
|-----------------------------------|--|
| 28.06.2022                        | <p><u>Writ Petition No. 2676-P/2021 with IR.</u></p> <p>Present: Mr. Jalal-ud-Din, advocate for the petitioners.</p> <p>Mr. Rab Nawaz Khan, Addl. AG for the respondents.</p> <p>*****</p> <p><u>LAL JAN KHATTAK, J.-</u> As the petitioners' representation is pending before the competent authority for decision thereon, therefore, this writ petition is disposed of with direction to the respondents-department to decide the petitioners' representation in accordance with law and rules on the subject within a period of two months from the receipt of copy of this order, however, if grievance of the petitioners is not redressed by the respondents then in that eventuality they may approach the competent Court of law.</p> |

*Ljan*  
JUDGE

JUDGE

42908

30-6-22

4-7-22

4-7-22

4-7-22

~~CONFIRMED TO BE TRUE COPY~~

04 JUL 2022

25

To, The Director General Sports,  
Khyber Pukhtunkhwa, Directorate of Sports,  
Peshawar Sports Complex Peshawar Cantt.

*Annexed - H*

**SUB: PROVISION FOR THE JUDGMENT AND ORDER DATED 28.06.2022 IN WRIT PETITION NO.2676-P/2021 TITLED AS ZIA UR REHMAN AND 12 OTHERS... VERSUS... THE GOVERNMENT OF KP & OTHERS FOR DECISION ON THE REPRESENTATION ON PROMOTION OF THE CLASS-IV EMPLOYEES TO JUNIOR CLERK (BPS-11).**

D.No. *357-17/05L class-iv*  
Date *05/07/2022*  
Directorate General of Sports  
Peshawar Cantt.

Respected Sir,

Enclosed please find herewith the Judgment and order of the Hon'able Peshawar High Court Peshawar in W.P.No.2676-P/2021 on the titled mentioned above for decision of the representation for promotion of the class-IV employees mentioned in the above titled writ petition to Junior Clerk (BPS-11) under the law and rules on the subject thereof. The Judgment and grounds of the writ petition is attached which is self explanatory on the subject. Further the relevant rules of 2019 on the subject is also attached herewith.

**APPLICANTS.**

1. Zia Ur Rehman S/o Aziz Ur Rehman ..... *Zia*
2. Usman Shah S/o Rahat Shah ..... *Usman*
3. Malang Jan S/o Bakhtar Khan..... *M. Jan 05/07/2022*
4. Muhammad Saleem S/o Bayaz Khan..... *Saleem*
5. Amir Shahzad S/o Muhammad Arif ..... *Amir*
6. Barqat Ullah S/o Muhammad Zaman ..... *Barqat*
7. Muhammad Bilal S/o Muhammad Bashir ..... *M. Bilal*
8. Muhammad Asif S/o Fazal wahid..... *Asif 05/07/2022*
9. Nisar Ahmad S/o mir zakam Khan ..... *Nisar*
10. Muhammad Sajid S/o Aziz Ur Rehman ..... *Sajid*
11. Amjid farid S/o Siraj Uddin ..... *Amjid*
12. Muhammad Bilal S/o Muhammad Yaseen ..... *M. Bilal 05/07/2022*
13. Naeem Akbar S/o saleem Akbar ..... *Naeem Akbar*

26

Ammed - H/1



GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, CULTURE, TOURISM, ARCHAEOLOGY, MUSEUMS  
& YOUTH AFFAIRS DEPARTMENT

(Sports Section)

No. SO (Sports) 1-7/ PSB/DPC/2022/31-7

Dated Peshawar the 22<sup>nd</sup> July, 2022

To

The Director General Sports,  
Khyber Pakhtunkhwa,  
Peshawar.

No. 538-17/Promotion  
Date 27/7/22  
Directorate General of Sports  
KPK Peshawar Office

Subject: - PROVISION FOR THE JUDGEMENT AND ORDER DATED 28-06-2022 IN WRIT PETITION NO. 2676-P/2021 TITLED AS ZIA-UR-REHMAN AND 12 OTHERS, VERSUS THE GOVERNMENT OF KP & OTHERS FOR DECISION ON THE REPRESENTATION ON PROMOTION OF THE CLASS-IV EMPLOYEES TO JUNIOR CLERK (BPS-11)

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of application dated 'Nil' submitted by Zia-ur-Rehman & others along-with Peshawar High Court Order Sheet dated 28-06-2022 for compliance, under intimation to this department.

2. Being a court matter may be treated as most urgent, please.

Yours faithfully,

*[Signature]*  
22-7-22

Section Officer (Sports)

Encl: As above

Copy to the:

1. Section Officer (Litigation), Sports Department, Peshawar.
2. PS to Secretary, Sports Department, Peshawar.
3. PA to AS-II, Sports Department, Peshawar.
4. PA to DS-I, Sports Department, Peshawar.

*[Signature]*  
22-7-22

Section Officer (Sports)

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Amended-I



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

**DIRECTORATE GENERAL OF SPORTS**  
**KHYBER PAKHTUNKHWA**  
PESHAWAR SPORTS COMPLEX PESHAWAR CANTT.  
PH# 9212767, FAX# 9212766.

Dated Peshawar the 28<sup>th</sup> January, 2022

**ORDER:**

No.17/Seniority List/Q.S.C/17: In pursuance of section-8 of Khyber Pakhtunkhwa Civil servants Act 1973 read with Rules-17 of NWFP Civil Servants(Appointment, Promotion & Transfer) Rules, 1989, the final seniority list of Junior Clerks (BPS-11) (as stood on 10<sup>th</sup> January, 2022), of the Directorate General of Sports Khyber Pakhtunkhwa is hereby notified / circulated for general information.

**FINAL SENIORITY LIST OF JUNIOR CLERKS (BPS-11), DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA**

Total sanctioned posts: 36 Junior Clerks, Filled: 20, Vacant: 16

| S.# | Name and Designation of the Official              | Academic Qualification | Date of birth | Domicile     | Date of 1 <sup>st</sup> Entry into Govt Service | Date of regular appointment / promotion to the present post |     |            | Method of recruitment / appointment | Date of adjustment in the District Sports Office | Name of Department from where declared surplus | Remarks |
|-----|---|------------------------|---------------|--------------|---|---|-----|------------|-------------------------------------|--|--|---------|
|     |   |                        |               |              |   | Post  | BPS | Date       |                                     |  |  |         |
| 1.  | Javed Khan, J/Clerk at DSO Tank                   | D.Com                  | 03-03-1976    | Tank         | 01-10-1995                                      | J/Clerk   | 11  | 1-10-1995  | By initial                          | -  | -  | -       |
| 2.  | Sijad Khan, J/Clerk at DSO Mansehra               | Matric                 | 25-12-1970    | Mansehra     | 28-6-1995                                       | J/Clerk   | 11  | 30-6-2001  | Adjusted through surplus pool       | 13-4-2007  | Public Health                                  | -       |
| 3.  | Ayaz Khan, J/Clerk at DSO Nowshera                | Matric                 | 01-09-1976    | Buner        | 13-04-1996                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | -       |
| 4.  | Gran Muhammad, J/Clerk at DSO Charsadda           | Matric                 | 15-02-1971    | Charsadda    | 30-05-1991                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | -       |
| 5.  | Ijaz-ul-Haq, J/Clerk at DSO Karak                 | M.A                    | 05-11-1978    | Kohat        | 01-03-2004                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | -       |
| 6.  | Abdul Wahid, J/Clerk at DSO Chitral (Lower)       | B.A                    | 10-12-1978    | Chitral      | 05-01-2006                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | -       |
| 7.  | Salma Khalid, J/Clerk, at Provincial Head Quarter | B.A                    | 13-09-1984    | Lakki Marwat | 27-04-2007                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | -       |

Cont... at Page \* 2 \*

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| S.#   | Name and Designation of the Official          | Academic Qualification | Date of birth | Domicile     | Date of 1 <sup>st</sup> Entry into Govt Service | Date of regular appointment / promotion to the present post |     |            | Method of recruitment / appointment | Date of adjustment in the District Sports Office | Name of Department from where declared surplus | Remarks                             |
|-------|---|------------------------|---------------|--------------|---|---|-----|------------|-------------------------------------|--|--|-------------------------------------|
|       |   |                        |               |              |   | Post  | BPS | Date       |                                     |  |  |                                     |
| 8.    | Gulfam, J/ Clerk at RSO Bannu                 | Matric                 | 13-03-1968    | Bannu        | 31-05-2007                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | Senior Clerk (BP14) ops a RSO Bannu |
| 9.    | Abdul Rahim Khan J/Clerk at RSO D.I.Khan      | Matric                 | 11-04-1968    | Bannu        | 31-05-2007                                      | J/Clerk   | 11  | 10-08-2018 | By Promotion                        | -  | -  | Supervisor (BPS-15) ops RSO Bannu   |
| 10.   | Mrs. Saiga Bibi, J/Clerk at RSO Mardan        | F.A                    | 19-06-1981    | Mardan       | 29-05-2019                                      | J/Clerk   | 11  | 29-05-2019 | By initial recruitment              | -  | -  | -                                   |
| ✓ 11. | Muhammad Yasir, J/Clerk at RSO D.I.Khan       | BCS (Hons)             | 27-03-1994    | D.I.Khan     | 01-01-2020                                      | J/Clerk   | 11  | 01-01-2020 | By Initial Recruitment              | -  | -  | -                                   |
| ✓ 12. | Jahan Zeb Khan, J/Clerk at DSO Kohistan Upper | B.A                    | 01-04-1988    | Kohistan     | 24-12-2019                                      | J/Clerk   | 11  | 24-12-2019 | By Initial Recruitment              | -  | -  | -                                   |
| 13.   | Mushtaq Ahmad, J/Clerk at RSO Bannu           | B-Tech (Hons)          | 08-05-1993    | Bannu        | 30-12-2019                                      | J/Clerk   | 11  | 30-12-2019 | By Initial Recruitment              | -  | -  | -                                   |
| ✓ 14. | Gulshan Iqbal, J/Clerk at DSO Karak           | MCS                    | 20-04-1989    | Karak        | 24-12-2019                                      | J/Clerk   | 11  | 24-12-2019 | By Initial Recruitment              | -  | -  | -                                   |
| ✓ 15. | Yasir Khan, J/Clerk at RSO Abbottabad         | M.Sc                   | 18-01-1993    | Abbottabad   | 26-12-2019                                      | J/Clerk   | 11  | 26-12-2019 | By Initial Recruitment              | -  | -  | -                                   |
| ✓ 16. | Ijaz Ullah, J/Clerk at DSO Lakki Marwat       | MCS                    | 27-05-1995    | Lakki Marwat | 10-02-2020                                      | J/Clerk   | 11  | 10-02-2020 | By Initial Recruitment              | -  | -  | -                                   |
| ✓ 17. | Muhammad Noman, J/Clerk at DSO Battagram      | B.Com                  | 15-03-1993    | Mansehra     | 24-12-2019                                      | J/Clerk   | 11  | 24-12-2019 | By Initial Recruitment              | -  | -  | -                                   |

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-: 3 :

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| S.#   | Name and Designation of the Official       | Academic Qualification | Date of birth | Domicile | Date of 1 <sup>st</sup> Entry into Govt Service | Date of regular appointment / promotion to the present post |     |            | Method of recruitment / appointment | Date of adjustment in the District Sports Office | Name of Department from where declared surplus | Remarks |
|-------|--|------------------------|---------------|----------|---|---|-----|------------|-------------------------------------|--|--|---------|
|       |  |                        |               |          |   | Method of recruitment / appointment                         |     |            |                                     |  |  |         |
|       |  |                        |               |          |   | Post  | BPS | Date       |                                     |  |  |         |
| ✓ 18. | Rozi Malk, J/Clerk at DSO Buner            | B.A                    | 25-04-1990    | Buner    | 24-12-2019                                      | J/Clerk   | 11  | 24-12-2019 | By Initial Recruitment              | -  | -  | -       |
| ✓ 19. | Muhammad Faheem Khan, J/Clerk at DSO Hangu | M.A                    | 01-05-1991    | Tank     | 26-12-2019                                      | J/Clerk   | 11  | 26-12-2019 | By Initial Recruitment              | -  | -  | -       |
| 20.   | Miss Kubsha Awan, J/Clerk at DSO Haripur   | BS (Hons)              | 12-03-1998    | Haripur  | 24-02-2021                                      | J/Clerk   | 11  | 24-02-2021 | By Initial Recruitment              | -  | -  | -       |

Endst: No. & Date even.

Copy forwarded to the: -

- (1) Section Officer (Sports), Sports & Youth Affairs, Department Khyber Pakhtunkhwa, Peshawar.
- (2) All Regional/ District Sports Officers in Khyber Pakhtunkhwa.
- (3) All Officials concerned.

  
DIRECTOR GENERAL

  
DIRECTOR GENERAL



30



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

**DIRECTORATE GENERAL OF SPORTS**

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

Dated Peshawar, the 26<sup>th</sup> May. 2022

**OFFICE ORDER:** / 1538-65

**No. 17/ Promotion/ OSC/ PSB/ 2021:-** In pursuance of the recommendation of Departmental Promotion Committee (DPC), in its meeting held on 25-04-2022, the following Junior Clerks (BPS-11) of the Directorate General of Sports Khyber Pakhtunkhwa are hereby promoted to the rank of Senior Clerks (BPS-14) with immediate effect:-

1. Mr. Javed Khan.
2. Mr. Sajjad Khan.
3. Mr. Ayaz Khan.
4. Mr. Gran Muhammad.
5. Mr. Ijaz-ul-Haq.
6. Mr. Abdul Wahid.
7. Mr. Salma Khalid
8. Mr. Gulfam.
9. Mr. Abdul Rahim Khan.
10. Mrs. Saiqa Bibi.
11. Mr. Muhammad Yasir.
12. Mr. Jahan Zeb Khan.
13. Mr. Mushtaq Ahmad.
14. Mr. Gulshan Iqbal.
15. Mr. Yasir Khan.
16. Mr. Ijaz Ullah.
17. Mr. Muhammad Noman.
18. Mr. Rozi Malk.
19. Mr. Muhammad Faheem Khan.

Consequent upon their promotion, they are further posted as mentioned below against each:-

| S. # | NAME OF OFFICIAL                        | PLACE OF POSTING                                 | REMARKS   |
|------|---|--|---|
| 1.   | Javed Khan, Senior Clerk (BPS-14)       | Regional Sports Office, D.I. Khan                | Conditionally promoted to the post of Senior Clerk (BPS-14) till the final decision of the Apex Court / Anti-Corruption Directorate |
| 2.   | Sajjad Khan, Senior Clerk (BPS-14)      | Regional Sports Office, Abbottabad               | Retained on the post of Senior Clerk (BPS-14)   |
| 3.   | Ayaz Khan, Senior Clerk (BPS-14)        | District Sports Office, Nowshera                 | Against the vacant post of Senior Clerk (BPS-14)  |
| 4.   | Gran Muhammad, Senior Clerk (BPS-14)    | District Sports Office, Charsadda                | Against the vacant post of Senior Clerk (BPS-14)  |
| 5.   | Ijaz-ul-Haq, Senior Clerk (BPS-14)      | District Sports Office, Karak                    | Retained on the post of Senior Clerk (BPS-14)   |
| 6.   | Abdul Wahid, Senior Clerk (BPS-14)      | District Sports Office, Chitral (Upper)          | Posted against the vacant post of Computer Operator (BPS-16) in OPS   |
| 7.   | Salma Khalid, Senior Clerk (BPS-14)     | Directorate General of Sports Khyber Pakhtunkhwa | Against the vacant post of Senior Clerk (BPS-14)  |
| 8.   | Gulfam, Senior Clerk (BPS-14)           | Regional Sports Office, Bannu                    | Retained on the post of Senior Clerk (BPS-14)   |
| 9.   | Abdul Rahim Khan, Senior Clerk (BPS-14) | District Sports Office, Bannu                    | Posted against the vacant post of Assistant (BPS-16) in OPS   |

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-: 2 :-

| S. # | NAME OF OFFICIAL                            | PLACE OF POSTING                         | REMARKS  |
|------|---|--|--|
| 10   | Mrs. Saiqa Bibi, Senior Clerk (BPS-14)      | District Sports Office, Mardan           | Against the vacant post of Senior Clerk (BPS-14)                     |
| 11   | Muhammad Yasir, Senior Clerk (BPS-14)       | District Sports Office, Tank             | Posted against the vacant post of Computer Operator (BPS-16) in OPS. |
| 12   | Jahan Zeb Khan, Senior Clerk (BPS-14)       | District Sports Office, Kohistan (Upper) | Against the vacant post of Senior Clerk (BPS-14)                     |
| 13   | Mushtaq Ahmad, Senior Clerk (BPS-14)        | District Sports Office, Bannu            | Against the vacant post of Senior Clerk (BPS-14)                     |
| 14   | Gulshan Iqbal, Senior Clerk (BPS-14)        | District Sports Office, Karak            | Against the vacant post of Senior Clerk (BPS-14)                     |
| 15   | Yasir Khan, Senior Clerk (BPS-14)           | District Sports Office, Swabi            | Against the vacant post of Senior Clerk (BPS-14)                     |
| 16   | Ijaz Ullah, Senior Clerk (BPS-14)           | District Sports Office, Lakki Marwat     | Retained on the post of Assistant (BPS-16) at Lakki Marwat in OPS    |
| 17   | Muhammad Noman, Senior Clerk (BPS-14)       | District Sports Office, Abbottabad       | Posted against the vacant post of Computer Operator (BPS-16) in OPS  |
| 18   | Rozi Malk, Senior Clerk (BPS-14)            | District Sports Office, Buner            | Against the vacant post of Senior Clerk (BPS-14)                     |
| 19   | Muhammad Faheem Khan, Senior Clerk (BPS-14) | District Sports Office, D.I Khan         | Against the vacant post of Senior Clerk (BPS-14)                     |

The services of the above promoted Senior Clerks (BPS-14) will be on probation for a period of one year as provided under section-6 (2) of Civil Servants Act, 1973.

Sd/-  
DIRECTOR GENERAL

Endst. No. & Date even

Copy forwarded for information and necessary action to the :-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Regional Sports Officer, D.I. Khan, Abbottabad, Bannu, Peshawar, Kohat, Mardan & Swat.
3. District Accounts Officer, D.I. Khan, Abbottabad, Nowshera, Charsadda, Karak, Chitral (Upper), Chitral (Lower), Mansehra, Bannu, Mardan, Tank, Kohistan (Upper), Swabi, Lakki Marwat & Buner.
4. District Sports Officer, D.I. Khan, Abbottabad, Nowshera, Charsadda, Karak, Chitral (Upper), Chitral (Lower), Mansehra, Bannu, Mardan, Tank, Kohistan (Upper), Swabi, Lakki Marwat & Buner.
5. Director (Operation) o/o DG Sports Khyber Pakhtunkhwa, Peshawar.
6. Section Officer (Sports), Sports and Youth Affairs Department, Khyber Pakhtunkhwa.
7. Assistant Director (Accounts) o/o D.G Sports Khyber Pakhtunkhwa.
8. PA to DG Sports, o/o DG Sports, Khyber Pakhtunkhwa.
9. Officials concerned.

ASSISTANT DIRECTOR (HQ)

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

## DIRECTORATE GENERAL OF SPORTS

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

29

Dated Peshawar, the 14<sup>th</sup> of May, 2019

### OFFICE ORDER:

**No.17/Promotion/QSC/PSB/18.**- In pursuance of the recommendation of the Departmental Promotion Committee, the following Tubewell Operators, Plumbers, Electricians & Generator Operators in BPS-03 of the Directorate General of Sports are hereby promoted to the rank of Care Takers/ Store Keepers (BPS-08) respectively with immediate effect: -

1. Mr. Yousaf Khan, Plumber Provincial H.Q
2. Mr. Wali Khan, Tube Well Operator Provincial H.Q
3. Mr. Fahim Hussain, Electrician, Provincial H.Q
4. Mr. Salman Babar, Tube Well Operator Provincial H.Q
5. Mr. Sabir Rehman, Electrician, Provincial H.Q
6. Mr. Farzand Ali, Electrician, Provincial H.Q
7. Mr. Salem Khan, Generator Operator Provincial H.Q
8. Mr. Arshad Ishfaq, Electrician, Provincial H.Q
9. Mr. Mehar Alam, Electrician, Provincial H.Q
10. Mr. Amjad Iqbal, Plumber, Provincial H.Q

Their services will be on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973. Consequent upon their promotion, they are posted against the vacant posts of Care Takers/ Store Keepers (BPS-08) mentioned below against each:-

| S. # | NAME & DESIGNATION OF THE OFFICIAL      | PLACE OF POSTING                                 |
|------|---|--|
| 1.   | Mr. Yousaf Khan, Care Taker (BPS-08)    | Directorate General of Sports Khyber Pakhtunkhwa |
| 2.   | Mr. Wali Khan, Care Taker (BPS-08)      | Office of the Regional Sports Officer, Mardan    |
| 3.   | Mr. Fahim Hussain, Care Taker (BPS-08)  | Office of the District Sports Officer, Swabi     |
| 4.   | Mr. Salman Babar, Care Taker (BPS-08)   | Office of the Regional Sports Officer, Kohat     |
| 5.   | Mr. Sabir Rehman, Store Keeper (BPS-08) | Directorate General of Sports Khyber Pakhtunkhwa |
| 6.   | Mr. Farzand Ali, Care Taker (BPS-08)    | Directorate General of Sports Khyber Pakhtunkhwa |
| 7.   | Mr. Salem Khan, Care Taker (BPS-08)     | Office of the Regional Sports Officer, Charsadda |
| 8.   | Mr. Arshad Ishfaq, Care Taker (BPS-08)  | Office of the Regional Sports Officer, Swabi     |
| 9.   | Mr. Mehar Alam, Care Taker (BPS-08)     | Office of the District Sports Officer, Swat      |
| 10.  | Mr. Amjad Iqbal, Care Taker (BPS-08)    | Directorate General of Sports Khyber Pakhtunkhwa |

DIRECTOR GENERAL

Dated 14-05-2019

No. 17/Promotion/QSC/PSB/18

Copy forwarded for information and necessary action to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director (Operation) o/o D.G Sports Khyber Pakhtunkhwa, Peshawar.
3. Section Officer (Sports), Sports and Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar.
4. Assistant Director (Accounts) o/o Director General Sports Khyber Pakhtunkhwa, Peshawar.
5. Regional Sports Officer Mardan & Kohat.
6. District Sports Officer Swat, Charsadda & Swabi.
7. District Accounts Officer Mardan, Kohat, Swat, Charsadda & Swabi.
8. Officials concerned.

DIRECTOR GENERAL

33



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

## DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA

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

Dated Peshawar, the 21<sup>st</sup> May, 2019

### OFFICE ORDER:

**No.17/Promotion/QSC/PSB/19.-** In pursuance of recommendation of the Departmental Promotor Committee (DPC) in its meeting held on 08-05-2019, the following Junior Squash Coach, Junior Coaches (BPS-10) are hereby promoted to the posts of Coaches (BPS-16) against the existing posts in the Directorate General of Sports Khyber Pakhtunkhwa and Abdul Wali Khan Sports Complex Charsadda on acting charge basis under Rule-9(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules-1989 with immediate effect:-

1. Mr. Shah Faisal.
2. Mr. Munawar Zaman.
3. Mr. Muhammad Nouman.
4. Mr. Muhammad Zubair.
5. Mr. Pervez Khan.
6. Mr. Nadeem Khan.
7. Mr. Faisal Javed.

Consequent upon their promotion, they are posted against the existing vacant post of Coaches (BPS-16) mentioned below against each:-

| S. # | NAME                 | PLACE OF POSTING   |
|------|----------------------|--|
| 1.   | Mr. Shah Faisal      | Martial Art Coach in the Directorate General of Sports Khyber Pakhtunkhwa.       |
| 2.   | Mr. Munawar Zaman    | Squash Coach, Abdul Wali Khan Sports Complex, Charsadda.                         |
| 3.   | Mr. Muhammad Nouman  | Tennis Coach, Abdul Wali Khan Sports Complex, Charsadda                          |
| 4.   | Mr. Muhammad Zubair. | Body Building / Weight Lifting Coach, Abdul Wali Khan Sports Complex, Charsadda. |
| 5.   | Mr. Pervez Khan      | Cricket Coach, Abdul Wali Khan Sports Complex, Charsadda.                        |
| 6.   | Mr. Nadeem Khan      | Badminton Coach, Abdul Wali Khan Sports Complex, Charsadda.                      |
| 7.   | Mr. Faisal Javed     | Football Coach, Abdul Wali Khan Sports Complex, Charsadda.                       |

DIRECTOR GENERAL

Dated 21-05-2019

Copy forwarded for information and necessary action to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director (Operation) o/o D.G Sports Khyber Pakhtunkhwa, Peshawar.
3. Section Officer (Sports) Sports and Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar to his letter No. (SO/S) 17/2008/DPC, dated 21-05-2019.
4. District Accounts Officer, Charsadda.
5. Assistant Director (Accounts) o/o D.G Sports Khyber Pakhtunkhwa, Peshawar.
6. District Sports Officer, Charsadda.
7. Administrator, Abdul Wali Khan Sports Complex, Charsadda.
8. Officials concerned.

DIRECTOR GENERAL

*Under 2019 Rules  
Appointment made*



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

34

No. SO(YA)Y-9/2017/SR/ /11752-54  
Dated Peshawar, the 10th September, 2020.

To

1. The Director General of Sports,  
Khyber Pakhtunkhwa, Peshawar.
2. The Directress Youth Affairs,  
Khyber Pakhtunkhwa, Peshawar.

Date: 246-24/S. Rules  
10-9-2020  
Directorate General of Sports  
KPK, Peshawar Cantt

Subject:- i) REQUEST FOR REVISION OF SERVICE RULES FOR PROMOTION OF NAIB QASID TO THE POST OF JUNIOR CLERK  
ii) REQUEST FOR PROMOTION OF NAIB QASID, CHOWKIDAR, MALI ETC

Dear Sir/Madam,

I am directed to enclose herewith a copy of minutes of the above subject meeting held on 08.09.2020 at 1100 hours in the office of Additional Secretary-II, Sports Department, Khyber Pakhtunkhwa for information and further necessary action at your end, please.

Yours faithfully,

Encl: As Above

*[Signature]*  
10/09/2020  
Section Officer (S & YA)

Copy is to the:

1. PA to Addl. Secretary-II, Sports & Youth Affairs Department, Peshawar.
2. PA to Deputy Secretary-III, Sports & Youth Affairs Department, Peshawar.

Section Officer (S & YA)

*[Handwritten signature]*

*all process done 16/9*

*Plz put up*

application requesting therein that they may be promoted to the post of Junior Clerk as per existing Service Rules.

MINUTES OF THE MEETING HELD ON 08-09-2020 AT 1100 HOURS IN THE  
OFFICE OF ADDITIONAL SECRETARY- II, SPORTS, CULTURE, TOURISM,  
ARCHAEOLOGY, MUSEUMS & YOUTH AFFAIRS DEPARTMENT, KHYBER  
PAKHTUNKHWA.

35

A meeting to discuss qualification for promotion to the post of Junior Clerk (BPS-11) prescribed in the Service Recruitment Rules of Directorate General of Sports and Directorate of Youth Affairs was held on 08-09-2020 at 1100 hours under the Chairmanship of Mr. Tariq Salam, Additional Secretary-II Sports & Youth Affairs Department. The following attended:-

1. Mr. Tariq Salam, In Chair  
Additional Secretary-II, Sports Department.
2. Mr. Saleem Jan,  
Deputy Secretary-III, Sports Department.
3. Miss. Iram Shaheen,  
Directress Youth Affairs.
4. Mr. Hamid Ali,  
Assistant Director (HQ),  
Directorate General of Sports.
5. Mr. Firasat Hussain,  
Section Officer (Sports),  
Sports & Youth Affairs Department.

2. Opening the discussion the chair welcomed the participants and asked Mr. Hamid Ali, Assistant Director (HQ), Directorate General of Sports to brief the forum regarding the matter under discussion. He explained that the qualification for promotion to the post of Junior Clerk in the Service Recruitment Rules of the Directorate General of Sports notified during the year 2017 was Matric but subsequently while making 'addition/amendments' in the said Service Recruitment Rules during the year 2019, the qualification was prescribed as Intermediate. Thus the Class-IV employees having Matric qualification were deprived from promotion to the post of Junior Clerk. As such they challenged and submitted a joint application requesting therein to reconsider the framed rules and qualification for promotion to the post of Junior Clerk may be kept Matric instead of Intermediate. The Directress Youth Affairs was also of the view that the same position exist in the Service Recruitment Rules of Directorate of Youth Affairs and the Class-IV employees having Matric qualification are demanding that the qualification for promotion to the post of Junior Clerk may be kept Matric instead of Intermediate.

3. It was further apprised that in the meanwhile the Class-IV employees coming under promotion quota having Intermediate qualification also submitted application requesting therein that they may be promoted to the post of Junior Clerk as per existing Service Rules.

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4. The matter was discussed in detail. During discussion it was pointed out that the Establishment Department has also amended the Service Recruitment Rules and the qualification for promotion to the post of Junior Clerk has been prescribed Intermediate by giving priority to the existing Matriculate employees for 4 years. The forum therefore decided not to change the existing qualification of Intermediate as the post of Junior Clerk is in BPS-11 which justify the requisite qualification of Intermediate instead of Matric. However, the chair was of the view that the existing Service Rules of the Directorate General of Sports & Directorate of Youth Affairs may be reviewed and if some amendments/changes are required to be made, a working paper may be prepared by each of the Directorate for placing before the Standing Service Rules Committee for discussion/decision.

5. The meeting ended with a vote of thanks from and to the chair.

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

**DIRECTORATE GENERAL SPORTS**  
**KHYBER PAKHTUNKHWA**  
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.  
Ph: # 9212767, Fax # 9212768

37

No. 24/Service Rules/2019

Dated Peshawar, the 7<sup>th</sup> July, 2020.

To

The Secretary to Govt of Khyber Pakhtunkhwa,  
Sports, Culture, Tourism, Archaeology, Museums  
& Youth Affairs Department, Peshawar.

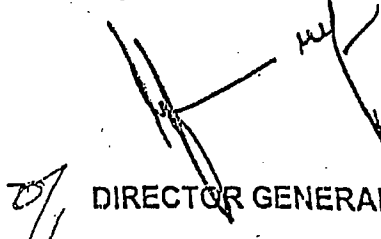
Subject: - REQUEST FOR REVISION OF SERVICE RULES FOR  
PROMOTION OF NAIB QASID TO THE POST OF JUNIOR CLERK.

Kindly refer to your letter No. SO(YA)Y-9/2017/SR/6450-51 dated 08-06-2020 on the subject noted above and to state that the Establishment Department Khyber Pakhtunkhwa has revised its service rules for promotion of Naib Qasid to the post of Junior Clerk (BPS-11) i.e. forty per cent by promotion on the basis of seniority-cum-fitness from amongst the Naib Qasids etc who have passed F.A/F.Sc examination or its equivalent qualification from a recognized Board and made changes in the qualification column, with the condition that F.A/F.Sc or its equivalent qualification shall not apply for a period of four years from the date of commencement of said notification.

As per existing service rules of the Directorate General of Sports, the criteria for promotion to the post of Junior Clerk is "thirty three per cent on the basis of seniority-cum-fitness from amongst the Naib Qasids, Chowkidars etc having at least two years service as such who have passed Intermediate Examination."

It is brought into your kind notice that service recruitment rules of this Directorate were under process of amendment since long. The qualification for promotion of Naib Qasids to the post of Junior Clerks was enhanced from SSC to intermediate with the approval of SSRC on the analogy of so many other departments.

In view the above it is requested that this Directorate may kindly be advised as to whether the promotion case of Naib Qasids may be processed as per existing Service Rules or otherwise.

  
DIRECTOR GENERAL





GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS &  
YOUTH AFFAIRS DEPARTMENT

The Khyber Pakhtunkhwa Government, 2020.

Office of the Director General Sports,  
Khyber Pakhtunkhwa,  
Peshawar

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To  
The Director Youth Affairs,  
Khyber Pakhtunkhwa,  
Peshawar

The Director General Sports,  
Khyber Pakhtunkhwa,  
Peshawar

Subject: - REQUEST FOR REVISION OF SERVICE RULES FOR PROMOTION  
OF NAIB QASID TO THE POST OF JUNIOR CLERK

Dear Sir,

I am directed to refer to the subject noted above and to  
enclose herewith a copy of an application alongwith Service Rules  
received from Naib Qasid, of Directorate General Sports and Youth  
Affairs, Khyber Pakhtunkhwa for views / comments, please.

Yours faithfully,

*[Signature]* 19/02/2020

Section Officer  
(Sports & Youth Affairs)

Encl: as above

Copy is forwarded for information to PA to Additional Secretary Sports &  
Youth Affairs Department, Khyber Pakhtunkhwa.

Section Officer  
(Sports & Youth Affairs)

~~DD/11/20~~  
~~16/1/2020~~

Please put up on file  
with pps. 21/2

95  
21/2  
A.S.C.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, TOURISM, CULTURE, YOUTH AFFAIRS, ARCHAEOLOGY  
PUC PAFK/M/2019/1018, DEPARTMENT CIVIL SECRETARIAT

24

Subject: - REQUEST FOR PROMOTION FROM THE POST OF NAIB QASID, CHOWKIDAR AND MALI ETC. TO THE POST OF JUNIOR CLERK ACCORDING TO SERVICE RULES, 2019

Mr Nisat, Malang Jan and others, Class-IV employes of Directorate of Sports & Youth Affairs, Khyber Pakhtunkhwa vide PUC have requested this Department for promotion to the Post of Junior Clerk in accordance with the Service Rules dated 29.04 2019 (Part-A) on the ground that they are fulfilling the criteria fixed for promotion to the post of Junior Clerk in the above mentioned rules.

It is to be noted that according to the Service Rules mentioned above, criteria for promotion from the post of Naib Qasids, Chowkidars etc is as under.

| S# | Nomenclature of post | Minimum qualification for appointment Initial recruitment  | Age limit     | Method of recruitment  |
|----|----------------------|--|---------------|--|
| 21 | Junior Clerk (BS-11) | At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with a speed of thirty (30) words per minute in typing | 18 - 30 Years | Thirty-three percent by promotion on the basis of seniority-cum-finesse, from amongst the Naib Qasids (BS-03), Chowkidars (BS-03), Security Guard (BS-03), Cleaners (BS-03), Conductors (BS-03) including holders of equivalent posts in the Directorate General of Sports having at least two years service as such who have passed Intermediate Examination. |

It is to be noted that some employees belonging to the Class-IV cadre of Directorate of Sports & Youth Affairs, Khyber Pakhtunkhwa, having matric qualification have also requested for promotion to the post of Junior Clerks and have requested that the condition of FA, FSc, may be expelled and matric qualification may be retained for promotion to the post of Junior Clerk. It is worth mentioning here that their case is under process in this Department.

Keeping in view the above, we may:

- i) Allow the Director General of Sports, Khyber Pakhtunkhwa to promote the Class-IV employees having Intermediate Qualification as per existing rules;

OR

- ii) we may wait till the outcome of the case already under process in this Department.

Submitted for orders as deemed appropriate, please.

*[Signature]*  
3.5/7/2020  
Section Officer (Sports)

Deputy Secretary-III



GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, CULTURE TOURISM, ARCHAEOLOGY  
MUSEUMS & YOUTH AFFAIRS DEPARTMENT

No. SO(YA)Y-9/2017/SR/  
Dated Peshawar, the 01<sup>st</sup> September, 2020.

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To

1. The Director General of Sports,  
Khyber Pakhtunkhwa, Peshawar.
2. The Director Youth Affairs,  
Khyber Pakhtunkhwa, Peshawar.

Subject: i) REQUEST FOR REVISION OF SERVICE RULES FOR PROMOTION  
OF NAIB QASID TO THE POST OF JUNIOR CLERK  
ii) REQUEST FOR PROMOTION OF NAIB QASID, CHOWKIDAR, MALI  
ETC

Dear Sir/Madam,

I am directed to refer to the subject noted and to state that meeting scheduled for 01.09.2020 at 11:00 AM has been postponed and now will be held on 02.09.2020 at 11:00 AM under the chairmanship of Additional Secretary-II in his office.

2. You are therefore requested to attend the above meeting on the scheduled date, time and venue, please.
3. In convenience caused is regretted.

Yours faithfully,

Section Officer (S & YA)

Copy is to the:

1. PA to Addl. Secretary-II, Sports & Youth Affairs Department, Peshawar.
2. PA to Deputy Secretary-III, Sports & Youth Affairs Department, Peshawar.

Section Officer (S & YA)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
SPORTS, CULTURE, TOURISM AND YOUTH AFFAIRS  
MUSHRUMI & YOUTH AFFAIRS DEPARTMENT

Head Office, Peshawar  
District Headquarters, Peshawar

The Director General of Sports  
Khyber Pakhtunkhwa, Peshawar

**Subject: REQUEST FOR PROMOTION FROM THE POST OF NAIB QASID,  
CHOWKIDAR AND MALLI ETC. TO THE POST OF JUNIOR CLERK  
ACCORDING TO SERVICE RULES, 2012.**

Dear Sir

I am directed to refer to the subject noted above and to enclose herewith a copy of application alongwith its enclosures of Mr. Nisar and others Class IV employees of Directorate General of Sports, Khyber Pakhtunkhwa for your valuable comments in the matter, please.

Yours faithfully,

*H. M. S. / 27/2020*

Section Officer  
(Sports & Youth Affairs)

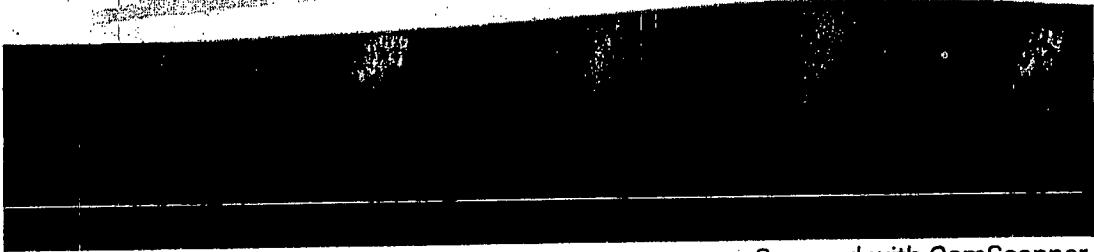
Encl. as above

Copy is to the:

PA to Deputy Secretary-III, Sports & Youth Affairs Department, Khyber Pakhtunkhwa, Peshawar.

Section Officer  
(Sports & Youth Affairs)

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بعدالت صائب مسرور سٹریٹس لٹریچر اینڈ پبلسٹیٹی کمپنی لیسٹڈ

Service Appeal - 122

2022ء پنجاب ایڈووکیٹس

محمد اسحاق بنام حکومت و دیگر

|       |     |
|-------|-----|
| مورخہ | --- |
| مقدمہ | --- |
| دعویٰ | --- |
| جرم   | --- |

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام لیسٹڈ کیلئے جیل اسٹریٹس لٹریچر اینڈ پبلسٹیٹی کمپنی لیسٹڈ کے نام سے درخواست کی گئی ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا 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 خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 14/11/22  
 ماہ ستمبر 2022ء

محمد اسحاق

Accepted &  
 Accepted  
 Talal-ud-din  
 Advocate  
 Peshawar

Rehmat Kundi  
 Advocate

محمد اسحاق  
 Muhammad Alam  
 Advocate