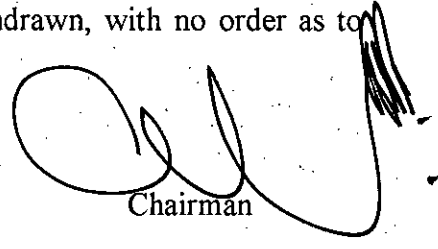


626/13

13.5.2014 Counsel for the appellant (Mr. Asad Zeb Khan, Advocate) and AAG for the respondents present. The learned counsel for the appellant informed that grievance of the appellant is being redressed by the respondent-department on the orders of the Peshawar High Court, Peshawar. The learned counsel further stated that the appellant has, therefore, instructed him to withdraw the appeal. The appeal is accordingly dismissed as withdrawn, with no order as to costs.

ANNOUNCED.

13.5.2014



Chairman

08.07.2013

Clerk of counsel for the appellant present. Both the respondents are absent despite their service through the concerned officials. However, Mr. Usman Ghani, Sr. GP is present and would be contacting the respondents for written reply/comments on 8.11.2013.


Chairman

08.11.2013

No one is present on behalf of the appellant. Mr. Falak Nawaz, DSP (legal) on behalf of the respondents with AAG present. Written reply has not been received, and request for further time made on behalf of the respondents. To come up for written reply/comments, positively, alongwith connected appeals on 11.2.2014.


Chairman

11.2.2014

Neither appellant nor his counsel present. Mr. Falak Nawaz, DSP(Legal) on behalf of respondents with AAG present. Written reply/para-wise comments received on behalf of the respondents, copy whereof be handed over to the appellant/counsel for the appellant for rejoinder alongwith connected appeals on 13.5.2014.


Chairman


13/5/14

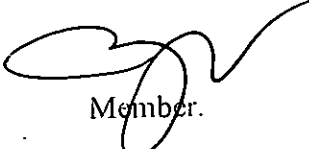
Appeal No. 626/2013,
Mr. Prayoduloch & Co.

3. 8.5.2013

Counsel for the appellant present and heard.


Contended that the appellant was appointed as Temporary ASI (TASI) in the respondent department on 10.4.1977 and after on his services were confirmed as such on 2.7.1980. The appellant is entitled to be confirmed from the date of his confirmation. He referred to 15 numbers of such cases decided by this Tribunal on the same point giving the benefits to the appellants. The appellant preferred a departmental appeal on 6.12.2012 but with no response. Points raised need consideration. The appeal is admitted to regular hearing, subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notices be issued to the respondents. Case adjourned to 8.7.2013 for submission of written reply.

Appellant deposited
security & process fee
Rs 1800/- Bank receipt
is attached with file
JMM


Member.

4. 11.4.2013


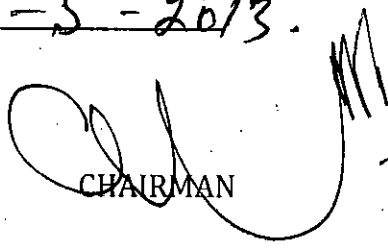
This case be put before the Final Bench I for further proceedings.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 626/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/04/2013	<p style="text-align: center;">The appeal of Mr. Inayat Ullah Shah resubmitted today by Mr. Ijaz Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	15-4-2013	<p style="text-align: center;">This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>8-5-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Inayatullah Shah DSP Swabi Circle Sawabi received today i.e. on 05/04/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Annexure-D of the appeal is illegible which may be replaced by legible one.

No. 564 /S.T,

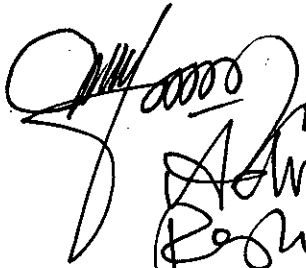
Dt. 05/04 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

MR.M.USMAN TURLANDI ADV. PESH.

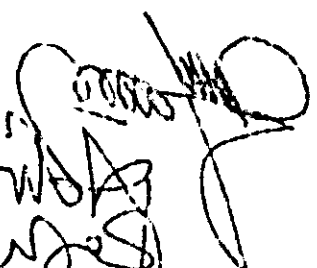
10-4-2013.

Re-submitted. All the annexures have been attested and a better copy to Annexure "D" is also placed on page-12.A.


Advocate
Peshawar.

10 - N - 3012

Re-submitted. All the comments
have been checked and a better
copy in answer 10 is also placed
on page 12. A.


J. B. Moore
J. B. Moore

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 626 of 2013.

Inayat Ullah Shah/ DSPVersus.....PPO & Other.

INDEX

S.No	DESCRIPTION OF DOCUMENTS	ANNEX	P.No
1.	Main Appeal	-----	<u>1-5</u>
2.	Affidavit	-----	<u>6</u>
3.	Address of Parties.	-----	<u>7</u>
4.	1st Order of appointment as T/ASI.	"A"	<u>8</u>
5.	Confirmation as ASI.	"B"	<u>9-10</u>
6.	Promotion Order as SI.	"C"	<u>11</u>
7.	Confirmation Order as SI.	"D"	<u>12-12A</u>
8.	Departmental Appeal dated 06-12-2012.	"E"	<u>13-16</u>
9.	Vokalatnama in original.		

APPELLANT
(Inayat Ullah Shah/DSP)

Through;

Muhammad Usman Khan
Turlandi
Advocate Peshawar.

Asad Zeb Khan.
Advocate Peshawar.

Dated :04/04/2013.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 626 of 2013.

K.W.P. Province
Service No. 684
Date 05/04/2013

Inayat Ullah Shah, DSP presently working and posted as Deputy Superintendent of Police Swabi Circle Swabi,.....**APPELLANT.**

VERSUS

1. Provincial Police Officer (PPO)/IGP
Khyber PakhtunKhwa Province, Central Police Office (CPO)
Peshawar.
2. Secretary to the Government of Khyber PakhtunKhwa Province,
Home & Tribal Affairs Department, Civil Secretariat KPK,
Peshawar.....**RESPONDENTS.**

SERVICE APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT,1974 FOR CONFIRMATION OF THE SPAN OF SERVICE RENDERED BY THE APPELLANT FROM THE DATE OF JOINING HIS SERVICE AS TEMPORARY ASI DATED 10-04-1977 TILL HIS CONFIRMATION AS ASI DATED 02-07-1980 WHEREAS THE DEPARTMENTAL REPRESENTATION OF THE APPELLANT DATED 06-12-2012 WAS NOT YET RESPONDED DESPITE THE STAPULATED PERIOD HAS BEEN ELAPSED.

PRAYERS:-

On acceptance of this appeal the respondents be directed to ensure the confirmation of the appellant from the date of joining his service as T/ASI w.e.f 10-04-1977 and the spot-less active service period rendered

[Signature]
5/4/13

re-submitted to ~~the~~
and filed.

[Signature]
10/4/2013

by the appellant as T/ASI till 02-07-1980 be confirmed with all back benefits and in the light of the verdicts passed by this august Tribunal, enumerated below and equal treatment as per principal of consistency be given to the appellant.

<u>Serial No.</u>	<u>Appeal No.</u>	<u>Name of Parties.</u>
1.	192/2004	Shafiullah Khan.....VS...PPO.
2.	193/2004	Javed Iqbal VS...PPO.
3.	194/2004	Hazrat AliVS...PPO.
4.	195/2004	Iftikhar Ahmed.....VS...PPO.
5.	196/2004	Abdul WadoodVS...PPO.
6.	197/2004	M.Mukhtiar.....VS...PPO.
7.	198/2004	Mir Qasim.....VS...PPO.
8.	199/2004	M.Zahir Shah.....VS...PPO.
9.	200/2004	Mati UrhamanVS...PPO.
10.	241/2004	M.Younas Khan ..VS...PPO.
11.	1361/2011	Younas Javed Mirza...VS...PPO.
12.	1370/2011	Muhammad Idrees.....VS...PPO.

RESPECTIVELY SHEWETH:

The appellant submits as under;

1. The appellant has joined the services in police department as Temporary Assistant Sub Inspector (T-ASI) on 10-04-1977 and later on 02-07-1980 his services as ASI were confirmed.(copy of the relevant orders are annexure as "A" & "B" respectively).
2. That the appellant was gradually promoted to the rank of Sub-Inspector on 03-11-1990 and was confirmed w.e.f 24-03-1996 vide notification dated 04-04-1996. (Copy of the orders/Notification is annexure "C" & "D" respectively).

3. That some of the colleagues after exhausting the remedy in Departmental representation, had approached this august Tribunal by filing their respective service appeal enumerated above seeking therein the confirmation of their respective services from the date of joining their services and this august Tribunal was pleased to pass a detailed judgment in Service Appeal mentioned above wherein the grievances of the appellants therein were properly redressed and their respective services as temporary appointment was considered as Active services and they were confirmed in their respective services from the date of joining their services.
4. That the respondents did not challenge the judgment of this august Tribunal before the appellate forum and thus the judgments of this august Tribunal have gained finality in the eyes of law, while the respondent department had also implemented the decision *ibid* and by confirming the appellant from the date of joining services were also assigned their revised seniority in the seniority list.
5. That the appellant in the given circumstances also approached the respondent No.1 through proper channel and filed the departmental representation for the redressal of his grievances on the analogy of the judgments referred above passed by this august Tribunal. (Copy of the departmental representation supported by the covering letter dated 06-12-2012 is annexure "E").
6. That the appellant did annexed the valuable and precious orders/judgment passed by the apex Supreme Court of Pakistan with his departmental representation wherein it was held that " if a Tribunal or the Supreme Court decides a point of law relating to the terms and conditions of a civil servant who litigated, and there were other civil servants, who may not have taken any legal proceedings, in such a case, the dictates of justice and rule of good governance demand that the benefits of the said decision be extended to other civil servants also, who may, not be parties to that litigation, instead of compelling them to approach the Tribunal or any other legal

forum---- all citizen are equal before law and entitled to equal protection of law as per Art.25 of the Constitution."

(2009 SCMR Page 1)

7. That the respondent No.1 neither bothered to accommodate the appellant and to redresses his grievances as prayed for nor took pain to reply the representation of the appellant in either way.
 8. That the appellant was appointed as T-ASI on 10-04-1977 against the Budgeted & sanctioned post who was later on confirmed as ASI on 02-07-1980 so the period in-between the first appointment and Subsequent confirmation was the active spotless services rendered by the appellant.
 9. That even otherwise the probation of a prospective civil servant is always counted as active service and while fixing the seniority the probation period has ever been taken into account.
 10. That in case of all civil servants and even CSS Cader etc where the two years probation period of the appointee is considered to be active service and seniority fixation has also been done accordingly.
 11. That it has also been held by the apex supreme court of Pakistan that the judgment of the Supreme Court unless reviewed would have binding force so far such previous judgment of the Supreme Court has remained intact----- petitioners could not be knocked out on principle of laches.
- (2010 SCMR Page 421).**
12. That further submission will be advances that at the time of hearing the appellant at the bar.

It is therefore humbly prayed that in view of the above facts & circumstances and on acceptance of this appeal the respondents be directed to ensure the confirmation of the appellant from the

(5)

date of joining his service as T/ASI w.e.f 19-04-1977 and the spotless service period rendered by the appellant as temporary ASI till 02-07-1980 be considered as active services and be confirmed as such with all back benefits in the light of the verdicts passed by this august Tribunal, enumerated above and equal treatment as per principal of consistency be given to the appellant.

Any other remedy if available may also be extended in favor of the appellant to meet the ends of justice.

APPELLANT.

Signature

(Inayat Ullah Shah DSP)

Through;

Muhammad Usman Khan
Turlandi
Advocate Peshawar.

Asad Zeb Khan.

Advocate Peshawar.

Dated :04/04/2013.

6

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

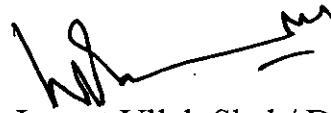
Service Appeal No. _____ of 2013.

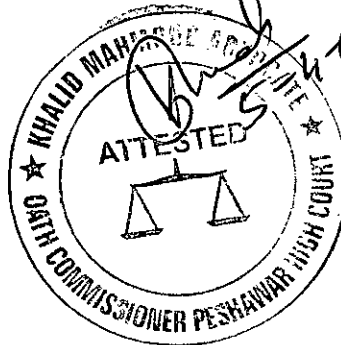
Inayat Ullah Shah DSPVersus.....PPO & Other.

AFFIDAVIT.

I, the appellant, do hereby solemnly affirm and declare on oath that the contents of the accompanying appeal are true and correct to the best of my knowledge and belief and that nothing has been kept or secret from this honorable Tribunal.

DEPONENT.


Inayat Ullah Shah/ DSP
(Appellant.)



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. _____ of 2013.

Inayat Ullah Shah/ DSPVersus.....PPO & Other.

ADDRESSES OF PARTIES.

APPELLANT.

Inayat Ullah Shah/ DSP Swabi Circle Swabi,

VERSUS

RESPONDENTS.

1. Provincial Police Officer (PPO)/IGP
Khyber PakhtunKhwa Province, Central Police Office (CPO)
Peshawar.
2. Secretary to the Government of Khyber PakhtunKhwa Province,
Home & Tribal Affairs Department, Civil Secretariat KPK,
Peshawar.

APPELLANT.

Signature

(Inayat Ullah Shah/DSP)

Through;

Muhammad Usman Khan
Turlandi
Advocate Peshawar.

Asad Zeb Khan.

Advocate Peshawar.

Dated :04/04/2013.

8

Annexure A

POLICE DEPARTMENT

PESHAWAR DISTRICT.

FOR PUBLICATION IN N.W.F.P. POLICE GAZETTE PART. II.
ORDERED BY THE SENIOR SUPERINTENDENT OF POLICE PESHAWAR.

NOTIFICATION

DATED PESHAWAR THE 16.4/1977.

5846

/EC:- DIRECT APPOINTMENT IN THE RANK OF TEMPORARY ASSISTANT SUB-INSPECTORS: The following Candidates were appointed as Temp: A.S. Is in the Existing vacancies w.e.f. 10.4.1977. On appointment they were posted to Peshawar District and allotted Range numbers as noted against their names:-

<u>No</u>	<u>Name and Address</u>	<u>Range No.</u>
	Constable Zarman Shah No 1229 s/o Noor Khan, Village Shahgai, P.S. Nizampur, now Madad Moharrir, P.S. Charsadda.	164/P
	Intiaz Ahmed s/o Fazal Rahim, Village Utmanzai, P.S. Charsadda, District Peshawar.	53/P
	Muhammad Ashfaq s/o Muhammad Ayub Khan village Saadat Abad, P.S. Charsadda, now Hamidullah building Eidgah Road Peshawar City.	97/P
	Ashfaq Ahmed s/o DSP Mushtaq Ahmed, village Tatar P.S. Mansehra, District Mansehra.	41/P
	Inayatullah Shah s/o Abdullah Shah H/No 5361 Nazar Garhi, Bana Mari, P.S. Ramdas Peshawar.	40/P
	Haroon-ur-Rashid Baber s/o Munir Khan Baber, village Pirpai, P.S. Nowshera Peshawar.	155/P
	Iftikhar Ahmed, Junior Clerk s/o Niaz Ahmed Qureshi Qtr. No 1/17, Civil Colony Kohat Road Peshawar.	157/P
	Kirammat Shah s/o Wahab Shah, H/No ED/14/27, Ghulam Bldg. Shahi Bagh Road, Peshawar City.	160/P
	Abdur Rashid s/o Mobin Khan, village Tarnab, P.S. Umarzai, District Peshawar.	172/P
	Junior Clerk Muhammad Javed s/o Abdul Qayum village Sarband, District Peshawar.	189/P
	Daud Ali s/o Haji Yousaf Ali village Tangi Nasratzai P.S. Tangi, District Peshawar.	118/P
	Junior Clerk Muhammad Nazir of Traffic, s/o Haji Muhammad Farid, village; Banda Payan, P.S. Daudzai District Peshawar.	198/P
	Salim Akbar s/o Muhammad Akbar, village Yasin Abad P.S. Daudzai, District Peshawar.	262/P
	Naveed Ahmed s/o Said Ahmed H/No 2717, Mohallah Marviha, P.S. 'C' Division Peshawar City.	437/P
	Arshad Iqbal Bangash s/o Mazullah Bangash of City Kohat,	438/P

SENIOR SUPERINTENDENT OF POLICE PESHAWAR.

14/4/77

ATTESTED TO BE TRUE COPY

M. Usman Khan Tufanq
M. A. LL. B Advocate
Peshawar.

POLICE DEPARTMENT.

PESHAWAR DISTRICT.

FOR PUBLICATION IN THE N.W.F.P. POLICE,
GAZETTE PART-II.ORDER BY THE SR: SUPERINTENDENT OF POLICE,
PESHAWAR.NOTIFICATION.

Dated Peshawar, the 28/1/1982.

/TO, SUBSTANTIVE PROMOTION/CONFIRMATION;=

The following "D" list H.Cs/Temporary ASIs Peshawar District were promoted as ASI substantive w.e.from 2.7.1980 and are confirmed with effect from the same date after counting their qualifying period towards probation under rules 13.18 of the Police Rules:-

S.NO:	NAME & NO:	RANGE NO: ALLOTTED:
1.	Sher Afzal NO.4030	520/P
2.	Khaista Gul No.99	521/P
3.	Missal Khan No.503	524/P
4.	Abdur Rab No.618	528/P
5.	Lal Badshah No.690	529/P
6.	Shamsuddin No.1043	531/P
7.	Kajir Khan No.844	533/P
8.	Islam Shah No.620	534/P
9.	Sardar Hussain No.234	535/P
10.	Nawab Khan NO.1679	536/P
11.	Mohammad Ali No.36	540/P
12.	Habib Shah No.1053	544/P
13.	Ghulam Nabi No.292	546/P
14.	Hikmat Shah No.1857	547/P
15.	Mohammad Saifur No.574	548/P
16.	Mohammad Yousaf No.1460	552/P
17.	Bokhari Shah No.1672	553/P
18.	Mir Salaf No.985	555/P
19.	Nisar Ahmed NO.1702	556/P
20.	Abdul Hamid NO.19	557/P
21.	Yousaf Khan No.850	560/P
22.	Mohammad Sadiq No.933	561/P
23.	Abdul Ali No.974	566/P
24.	Mohammad Idris No.360	569/P
25.	Neuroz Khan No.400	573/P
26.	Fazal Haq No.1457	574/P
27.	Mohammed Ashraf No.622	575/P
28.	Hassan Khan No.95	577/P
29.	Begham Shah No.494	578/P
30.	Mir Asghar No.640	579/P
31.	Reza Khan No.846	580/P
32.	Fakhrullah No.1992	581/P

ATTESTED TO BE
TRUE COPY

M/ Usman Khan Turlan
M. A. LL. B Advocate
Peshawar.

FOR PUBLICATION IN THE NWFP, POLICE GAZETTE PART-I
ORDERS BY THE SR: SUPERINTENDENT OF POLICE PESHAWAR

NOTIFICATION.

DATED PESHAWAR THE 15.11.1990

No. 247778 /EC:- OFFG: PROMOTION IN THE RANK OF SI:- The following ASIs of Peshawar District are promoted as Offg: Sub-Inspectors with effect from the dates as noted against each:-

1.	SI Mir Asghar No. 579/P	3.11.1990
2.	SI Shah Jehan No. 357/P	3.11.1990.
3.	" Fakhrullah No. 581/P	20.11.1990.
4.	" Amanullah Khan No. 583/P	3.11.1990.
5.	" Fazal-e-Karim No. 584/P	3.11.1990.
6.	" Mian Kiramat Shah 160/P	3.11.1990.
7.	" Sanaullah No. 286/P	3.11.1990.
8.	" Haroon-ur-Rashid Baber No. 155/P	3.11.1990.
9.	" Intiaz Ahmad No. 531/P	3.11.1990.
10.	" Inayatullah Shah No. 40/P	3.11.1990.
11.	" Shakirullah No. 209/P	3.11.1990.
12.	" Mohammad Israr No. 225/P	3.11.1990.
13.	" Fazal-e-Nayat No. 440/P	3.11.1990.

(Sr: Superintendent of Police
Peshawar.

No. 24779-82 /EC, dated Peshawar the 15.11.1990.

Copy forwarded to:-

1. The Dy: Inspector General of Police, Peshawar Range, Peshawar together with 7 spare copies for favour of publication.
2. The Dy: Inspector General of Police, Special Branch NWFP, Peshawar.
3. The Asstt: Inspector General of Police, Crimes Branch, NWFP, Peshawar.
4. The Asstt: Inspector General of Police, Traffic NWFP, Peshawar.

(Sr: Superintendent of Police
Peshawar. *A.C.

C
 REPRODUCED TO BE
 MADE COPY
 M. A. L. B Advocate
 Peshawar.

POLICE DEPARTMENT.

FEHSAYAR DISTRICT.

FOR PUBLICATION IN THE GAZETTE PART-II, ORDER BY THE SEEDER OF PUBLICATION...

REGISTRATION.

DATE FEBRUARY 11 16/10 1996

No. 10905/100, ADDRESS/CORRECTION/CONFIRMATION IN THE CASE OF THE FOLLOWING INDIVIDUALS/COMMUNICATED IN PERSONS IN THE NOTIFICATION issued vide this office order No. 3001-5/24, dated 4.4.1996 and read the date of confirmation in the list of SE as under instead of 24.3.1996-

S/No	Name Rank & Reg. No.	Date of Confirmation
1)	SI Mansoor Khan No. 1/5	3.8.1994
2)	SI Mansoor Khan No. 1/5	3.8.1994
3)	SI Mansoor Khan No. 1/12	3.8.1994
4)	SI Mansoor Khan No. 1/20	3.8.1994
5)	SI Mansoor Khan No. 1/24	3.8.1994
6)	SI Mansoor Khan No. 1/25	3.8.1994
7)	SI Mansoor Khan No. 1/28	3.8.1994
8)	SI Mansoor Khan No. 1/29	3.8.1994
9)	SI Mansoor Khan No. 1/30	3.8.1994
10)	SI Mansoor Khan No. 1/35	3.8.1994
11)	SI Mansoor Khan No. 1/39	3.8.1994
12)	SI Mansoor Khan No. 1/40	3.8.1994
13)	SI Mansoor Khan No. 1/45	3.8.1994
14)	SI Mansoor Khan No. 1/48	3.8.1994
15)	SI Mansoor Khan No. 1/49	3.12.1994
16)	SI Mansoor Khan No. 1/55	28.3.1996
17)	SI Mansoor Khan No. 1/56	28.3.1996
18)	SI Mansoor Khan No. 1/57	1.4.1996
19)	SI Mansoor Khan No. 1/58	5.4.1996
20)	SI Mansoor Khan No. 1/60	19.5.1996
21)	SI Mansoor Khan No. 1/62	31.5.1996

2806/15
16-10-96
Fehsayer

Senior Superintendent of Police, Fehsayer.

No. 10906-11/100, dated February 11 1996.

Copy together with 6 spare copies of the notification is forwarded to the Dy. Inspector General of Police, Fehsayer for favour of publication in the G.O.P. Police, Gazette Part-II v/x to his Order No. 9812-24/ dated 10.10.1996.

- 2) Dy. Inspector General of Police, Special Branch BIF, Fehsayer.
- 3) Dy. Inspector General of Police, Crime Branch BIF, Fehsayer.
- 4) Dy. Inspector General of Police, CID, BIF, Fehsayer.
- 5) Dy. Inspector General of Police, Traffic BIF, Fehsayer.
- 6) PA to S.S.P.

S.P.C.

17/10/96

10906/11/100
17/10/96

REQUESTED TO BE
M. U. B. Advocate

Senior Superintendent of Police, Fehsayer

BETTER COPY.

19-A

POLICE DEPARTMENT

PESHAWAR DISTRICT

FOR PUBLICATION IN THE N.W.F.P POLICE GAZETTE PART-II
ORDERS BY SENIOR SUPERINTENDENT OF POLICE PESHAWAR

NOTIFICATION

Dated Peshawar the 16.10. 1996

No. 10905/EC, ADDENDUM/CORRIGENDUM CONFIRMATION IN THE RANK OF SUB-INSPECTOR:-
The following addendum/corrigendum is hereby made in the notification issued vide this office
Endst: No. 3601-6/EC dated 04.04.1996 and read the date of confirmation in the Rank of SI as
under instead of 24.03.1996.

<u>S. No</u>	<u>Name Rank & Range No.</u>	<u>Date of Confirmation</u>
1).	SI Javed Haider Tareen No. P/5	03.08.1994
2).	SI Niaz Ali No. P/10	03.08.1994
3).	SI Jehangir Khan No. P/12	03.08.1994
4).	SI Wisal Khan No. P/20	03.08.1994
5).	SI Adnan Khan No. P/24	03.08.1994
6).	SI Qazi Saeed Ullah No. P/23	03.08.1994
7).	SI Muhammad Nazir No. P/28	03.08.1994
8).	SI Daud Shah No. P/29	03.08.1994
9).	SI Muhammad Saifur No. P/35	03.08.1994
10).	SI Muhammad Saddique No. P/36	03.08.1994
11).	SI Mir Asghar Khattak No. P/39	03.08.1994
12).	SI Shah Jehan No. P/40	03.08.1994
13).	SI Fazal Karim No. P/95	03.08.1994
14).	SI Sana Ullah No. P/48	03.08.1994
15).	SI Haroon-ur-Rashid Baber No. P/49	01.12.1994.
16).	SI Imtaiz Ahmad No. P/55	24.03.1996.
17).	SI Inayat Ullah Shah No. P/56	24.03.1996.
18).	SI Inayat-ur-Rehman No. P/57	01.04.1996.
19).	SI Qaisar Khan No. P/58	05.04.1996.
20).	SI Abdul Malik No. P/60p	19.05.1996.
21).	SI Hadayat Ulla No. P/62	14.06.1996.

sd/
Senior Superintendent of Police
Peshawar.

No. 10906-11/EC dated Peshawar the

/1996

Copy together with 6-spare copies of the Notification is forwarded to
Inspector General of Police, PR, Peshawar for favour of publication in the NWFP Police Gazette
Part-II w/r to his Endst: No. 9812-121 dated 10.10.1996.

- Dy: Inspector General of Police Special Branch NWFP Peshawar.
- Dy:Inspector General of Police Crime Branch NWFP Peshawar.
- Asstt: Inspector General of Police, CID NWFP Peshawar.
- Asstt: Inspector General of Police Traffic, NWFP Peshawar.
- PA to SSP.

sd/
**ATTES TO BE
TRUE COPY**

sd/
M. Usman Khan Turlandi
M. A. LL B Advocate
Peshawar,

Senior Superintendent of Police
Peshawar.

2013

Annexure "E"

From: - The Addl: Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa,
Peshawar.

Phone: 9218173
Fax : 9218073

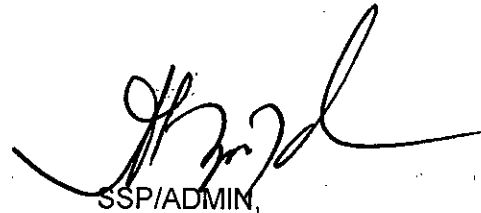
To: - The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

No. **8249** /EB, dated Peshawar the **06/12** /2012.

Subject: - APPEAL.

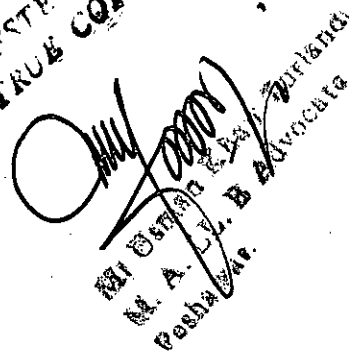
Memo: -

Enclosed please find herewith an appeal submitted by Mr. Inayat Ullah Shah, DSP/HQrs Special Branch, Khyber Pakhtunkhwa regarding confirmation as ASI from the date of appointment that is 10.4.1977 according to 19-25 Police Rules 1934 for further necessary action please.



SSP/ADMIN,
FOR ADDL; INSPECTOR GENERAL OF POLICE,
SPECIAL BRANCH, KHYBER PAKHTUNKHAWA,
PESHAWAR.

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M. A. L. B. ADVOCATE
Peshawar.

To

③ ⑭

The Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar

THROUGH PROPER CHANNEL

Subject: CONFIRMATION AS ASI FROM THE DATE OF APPOINTMENT THAT IS 10/04/1977, ACCORDING TO 19.25, POLICE RULES 1934.

Respected Sir:

1. I was appointed as TASI on 10/04/1977 in Police Department Peshawar Range, Peshawar (Copy attached as **Annexure "A"**).
2. I was confirmed as ASI w.e.from 02/07/1980 (copy attached as **Annexure "B"**)
3. I was substantively promoted to the rank of Sub-Inspector on two years probation w.e.from 03/11/1990 and was confirmed w.e. from 24/03/1996 vide Notification No. 3601/EC dated 4/04/1996. (Copies attached as **Annexure "C & D"**).
4. My name was brought on promotion list 'F' w.e. from 19/09/1997 vide Notification No. 23554-84/E-II and was promoted as Inspector from 23/06/2001 vide Notification No. 10590/EC dated 06/12/2001. (Copy attached as **Annexure "E"**).
5. I was promoted to the rank of DSP on 23/02/2009, and presently working as DSP Hqs Special Branch. (Copy attached as **Annexure "F"**).
6. According to Police rules 19,25, 1934, Inspector, Sub-Inspector and Assistant Sub-Inspector who are directly appointed, after completion of three years satisfying probation period would be confirmed from the date of appointment and directly appointed SI Legal will be confirmed under procedure of 19,26, Police Rules 1934 by Deputy Inspector General of Police concerned.
7. Below mentioned Officers were confirmed from the date of appointment directly by the DIG Kohat and D.I Khan Ranges, by adopting procedure of 19,26, Police Rules 1934, vide Notification No. 2196-98/EC, dated Kohat 30/06/2008, Notification No. 2684-86/EC, dated Kohat 23/07/2008, Notification No. 1306-8/EC, dated D.I Khan 15/04/2009

SI Legal Muhammad Ibrahim Azhar of Kohat Range

SI Legal Ishaq Gul of Kohat Range

SI Legal Ibrahim Ullah Khan of Kohat Range

SI Legal Altaf Hussain of D.I.Khan Range

(Copy attached as **Annexure "G, H & I"**).

8. The following officers were appointed as TASI in Malakand Range on 01/04/1977, who approached Service Tribunal Khyber Pakhtunkhwa, Peshawar seeking confirmation from the date of their appointment:-

- i) Muhammad Zahir Shah
- ii) Muhammad Younas Khan
- iii) Shafi Ullah Khan

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M. A. LL.B.
M. A. LL.B Advocate
Peshawar

- iv) Javed Iqbal
- v) Mathi ur Rehman
- vi) Iftikhar Ahmad
- vii) Hazrat Ali
- viii) Muhammad Mukhtar
- ix) Abdul Wadood and Mir Qasim Khan

9. The Khyber Pakhtunkhwa Service Tribunal accepted their plea and directed the department to make confirmation of all these officers from the date their appointment i.e. 01/04/1977. The relevant paragraph of the judgment of the Services Tribunal dated 12/03/2005 is reproduced below:-

"In our opinion the probation period of a respective civil servant is always counted as active service, as is done in case of other service like CSS etc where the two years probation period of the appointee is considered to be active service, and seniority fixation is done accordingly as regards the sanctioning or otherwise of the posts of ASIs in Malakand Range from 01/04/1977, we feel that it was primary responsibility of the department to have ensured that budgeted posts did exist before making appointment of the appellant and his batchmates. If the department lapsed on that score, the appellants and his batchmates should not made to suffer for the failings of others. With these remarks the appeal is accepted as praved for, and the decision of the earlier DPC meeting dated 14/05/2002 wherein the services of the appellant and his batchmates were regularized w.e. from 01/04/1977 is hereby restored. No order as to costs. File be consigned to the record". (Copy attached as Annexure "J").

10. Younas Javed, Muhammad Idrees Khan DSsP were also confirmed form the date of appointment vide Service Tribunal Khyber Pakhtunkhwa Peshawar judgment dated 12/01/2012.

"In view of the above, the appeal is accepted, the impugned order dated 04/07/2011, is set aside and the appellant is confirmed from the date of appointment i.e 28/03/1975, with seniority and other consequential benefits. Parties are left to bear their own costs. (Copy attached as Annexure "K").

11. Honorable Supreme Court of Pakistan has held in the various judgments, "that if a Tribunal or the Supreme Court decides a point of Law relating to the terms and condition of a Civil Servant who litigate, and there were other Civil Servants, who may not have taken an legal proceedings, in such case, the dictates of Justice and rule of good Governance demand that the benefit of the decision be extended to other Civil Servants also, who may, not be parties to that litigation, instead of completing them to approach the Tribunal or any other legal forum. All citizens are equal before Law and entitled to equal protection of Law as per Art 25 of the constitution. (Copy attached as Annexure "L"). It refers to the following cases:-

- i. Hameed Akhtar Niazi v. The Secretary, Establishment Division, Government of Pakistan and other 1966 SCMR 1185 and Tara Chand and others v.

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 [Signature]
 A. I. L. B. A. Advocate
 Peshawar

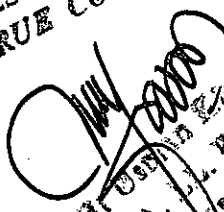
(16) (18)

Karachi Water and Sewerage Board, Karachi and others 2005 SCMR 499 fol.

- ii. Mst. Muqqdas Akhtar and another v. Province of Punjab through Secretary Education Department, Government of Punjab and another 2000 PLC (C.S) 867 ref.
 - iii. Mst. Afshan Ghazanfar, A.A.-G.; Punjab and Rana Abdul Qayyum, D.S. (Education) Punjab for Petitioners.
 - iv. S.M. Tayyab, Senior Advocate Supreme Court for respondents (in Cr. Ps. Nos. 71-L, 72-L and C.P 224-L of 2008.
12. Recently Departmental Selection Committee constituted vide notification No. S/100 dated 20/02/2007 was held on 12/06/2012 in the conference room of CPO under the chair of Addl.IG Hqrs and its six other learned member who made it crystal clear that police officers appointed directly in the rank of ASI shall be confirmed from the date of regular appointment after completion of probation period in the light of various judgments of the Services tribunal, High court Peshawar and Supreme Court of Pakistan. (Copy attached as **Annexure "M"**).
13. According to the decision of Khyber Pakhtunkhwa Service Tribunal Eleven officers of Malakand/D.I Khan Ranges were confirmed from the date of their initial appointment in Service and subsequently assigned seniority as such.
14. On the same analogy, I am also entitled to be confirmed from the date of appointment, as held by the **Honorable Supreme Court of Pakistan** in its decision mentioned in Para 13 ante.
15. Due to non-confirmation from the date of appointment i.e. 10.04.1977 plenty of junior Police Officers of different junior batch were senior to me as per "F" list issued vide Notification No.5482-94/E-II, dated Peshawar 31.03.2004. (Copy attached as **Annexure "N"**).
16. In view of above factual and legal position, my case needs consideration on merit and deserve to be confirmed from the date of appointment with my coursmat.

It is therefore, requested that I may kindly be confirmed from the date of appointment i.e 10/04/1977 in the light of 19,25 Police Rules 1934, judgment of Apex Supreme Court of Pakistan, Service Tribunal Khyber Pakhtunkhwa Peshawar and DPC held on 12.06.2012. My name brought at right place in the revise seniority list "F" with my coursmat.

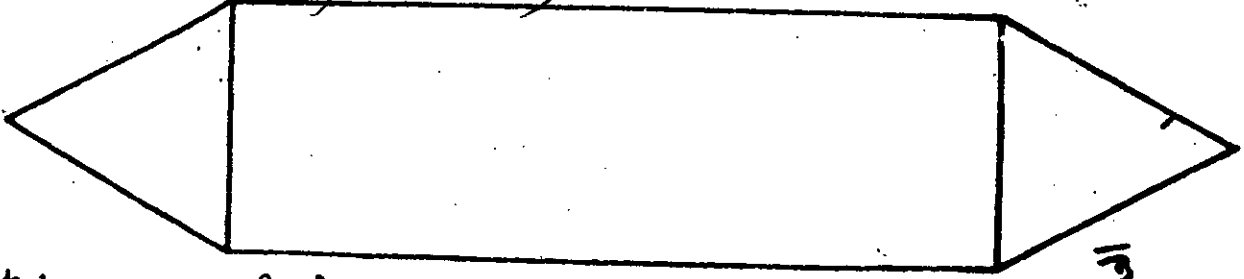
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TRUE COPY


Mr. Usman Farooq
M. A. J. B Advocate
Peshawar.

Your's obediently,


(INAYAT ULLAH SHAH)
DSp/Hqrs, Special Branch,
Peshawar

KPK
بعد الت حجاب خیدر پختونخوا سرویس ٹریڈنگ پیشا و کم



2013ء میں منجانب اپیلانٹ

04-04-2013

مورخ

P.P.O وغیرہ بنام

Service Appeal

مقدمہ

دعویٰ

جزم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام پیشاور کے لئے محمد عثمان خان تہ (انڈی اینڈ اسٹریٹس خان ایڈووکیٹس) مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک در پیہ اور رضی دعویٰ اور درخواست ہر قسم کی تصدیق نہ رہیں پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکفر یا اپیل کی برآمدگی اور رضی نیز دائر کرنے اپیل ٹکرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی جگہ تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جلد مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرداخت منظور و قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی دھوا کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاخیر پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا ذرا کالت نامہ لکھ دیا کہ سند رہے۔

Attested by
Accepted by 2013

ماہ اپریل
المترجم حیار (ہ)

Asad Zeb
Advocate
کے لئے منظور ہے۔

Asad Zeb Ishaq
Advocate

I

BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR

Service Appeal No.626/2013

Inayat Ullah Shah DSP..... (Appellant).

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa and others

.....(Respondents).

Subject: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully Sheweth:-

Preliminary objections:-

- a. That the appeal of appellant is not maintainable in the present form.
- b. That the appeal is bad for misjoinder/nonjoinder of necessary parties.
- c. That the appellant is estopped by his own conduct to file the present appeal at this stage.
- d. That the appeal of appellant is badly barred by time.
- e. That appellant being a Police officer is governed under the Police Rules 1934 read with Police order 2002 and not under the Civil Servants Act 1973.
- f. That the appeal of appellant is based on no facts and appellant has got no cause of action.

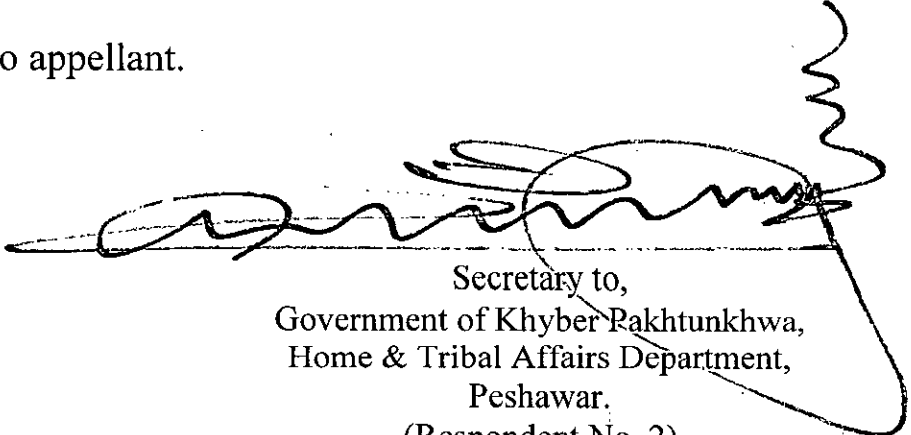
Facts:-

1. Correct to the extent that appellant was appointed as temporary ASI in the year 1977 and was confirmed in the rank of ASI in the year 1980 after completion of probation period. Appellant has wrongly contended antedated confirmation at this belated stage after lapse of about 33 years long period.
2. This Para of the facts of appeal pertains to record of service of appellant therefore needs no comments.

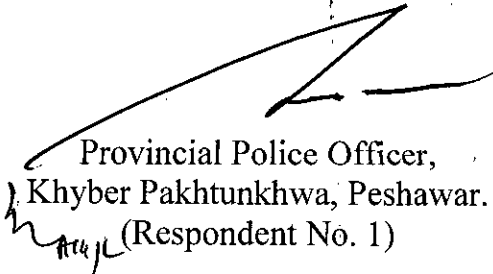
3. This Para is related to tribunal, however, the confirmation and seniority of junior ranks of Police officers (constable to Inspectors) is governed by Police rules wherein separate criteria for confirmation and seniority have been provided. Promotion from one rank to another is subject to qualification of certain courses and experience.
4. This Para is related to court/tribunal decision therefore needs no comments.
5. The Departmental Representation filed by the appellant and others were taken up for consideration and decision during in House Committee meeting held on 27.05.2013 and 29.05.2013 in conference Room of CPO Khyber Pakhtunkhwa Peshawar under the chairmanship of Provincial Police Officer Khyber Pakhtunkhwa wherein unanimous decision was made that all the DSsP shall be given seniority as per their date of confirmation in the light of Police Rules 12-2(3) of 1934 in the rank of SI and not from the date of appointment/promotion as ASI. Accordingly seniority list of DSsP was revised. Copy of the minutes of the in House meeting is enclosed as Annexure "A" while revised list of DSsP as stood on 05.06.2013 is enclosed as Annexure "B".
6. Incorrect, however it is pointed out that all the DSsP were given equal treatment and protection of law and no discrimination was meted out to any Police Officers of senior or junior rank of Police.
7. This Para has already been explained while answering Para 5 of the appeal therefore need no further comments.

- 3
8. That the appellant was confirmed as ASI after the completion of probation period of 03 year, in accordance with Police Rules.
 9. Incorrect, the Police Officers, being member of disciplined force are governed under Police rules and not under the Civil Servant Act 1973. The seniority of the Police Officers is always determined/fixed in accordance with Police Rules 12-2(3) read with 12-8 of 1934.
 10. This Para is not concerning junior ranks of Police.
 11. This Para is related to decision of Apex Court hence no comments.
 12. That the respondents may also be allowed to raise additional points during hearing of the case.

It is therefore requested that appeal filed by the appellant may be dismissed being time barred and in conflict with the Rules applicable to appellant.



Secretary to,
Government of Khyber Pakhtunkhwa,
Home & Tribal Affairs Department,
Peshawar.
(Respondent No. 2)



Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)

BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.626/2013

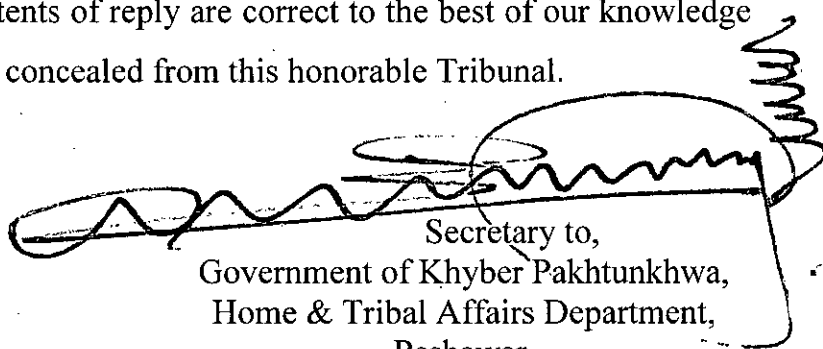
Inayat Ullah Shah DSP..... (Appellant).

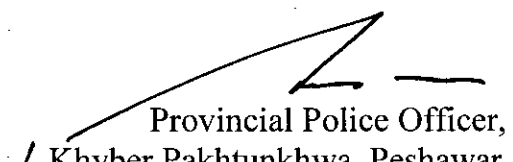
VERSUS

Provincial Police Officer Khbyer Pakhtunkhwa and others

Subject:- **AFFIDAVIT.**

We the respondents in the above cited service appeal do hereby solemnly affirm that the contents of reply are correct to the best of our knowledge and belief. Nothing has been concealed from this honorable Tribunal.


 Secretary to,
 Government of Khyber Pakhtunkhwa,
 Home & Tribal Affairs Department,
 Peshawar.
 (Respondent No.2)


 Provincial Police Officer,
 Khyber Pakhtunkhwa, Peshawar.
 (Respondent No. 1)

ATTESTED


 AZMAT ALI
 30/12/2013
 SESSIONS COURT PESHAWAR

MINUTES OF IN-HOUSE MEETING

In house meetings were held in two phases, 1st on 27th May, 2013 and the 2nd on 29th May, 2013 at Conference Room CPO Peshawar under the Chairmanship of Mr. Ihsan Ghani Provincial Police Officer Khyber Pakhtunkhwa. Representatives from Executive and Legal branches also participated. The following cases were discussed in detail:-

1. Case regarding Joint Seniority of Executive and Legal Branches in light of judgement of Peshawar High Court dated 24.04.2013.
 2. Determination of Seniority of DSsP in the light of Courts Judgments.
1. **Case regarding Joint Seniority of Executive and Legal Branches in light of judgement of Peshawar High Court dated 24.04.2013.**

The Honourable High Court Peshawar in its Judgement dated 24.04.2013 in Writ Petition No. 1680-P/2012 filed by Mian Mustafa Gul DSP Legal/Asstt. Director, ACE, Peshawar directed the respondent Department (Police Department) to issue combined Seniority List of two Branches of the Police Department i.e Legal and Executive and thereafter make promotions on the basis of seniority cum fitness in accordance with law in terms of Article 8 (2) (p) of the Police order, 2002.

Abstracts from the Police Rules and Court judgments were put before the house, which are reproduced below:-

Police Rule 12.6 (3) (c)

After recruitment, no Inspector Legal shall be allowed change of cadre from Inspector Legal to the Executive or any other branch in the Police Department.

Article 8 (2) P of Police Order-2002.**Article 8. Police to be organized on functional basis:-**

(1) The Police establishment constituted under Article 7 shall, as far as practicable, be organized on functional basis in to branches, divisions, bureaus and sections.

(2) The branches, divisions, bureaus and sections referred to in clause (1) may include- (a) Investigation; (b) Intelligence; (c) Watch and Ward; (d) Reserve Police; (e) Police Accountability; (f) Personnel Management; (g) Education and Training; (h) Finance and Internal Audit; (i) Crime Prevention; (j) Crime against women; (k) Traffic Planning and Management; (l) Criminal Identification; (m) Information Technology; (n) Transport; (o) Research and Development; (p) Legal Affairs; (q) Welfare; (r) Estate management.

XSI
9/5/13

Criterion for determining seniority of subordinate ranks of Police force, held, would be provided by R. 12.2, Police rules, 1934 as from dates of their confirmation and not from date of continuous appointment in the grade as laid down in Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974, r. 8 (1) (6) read with S. 7 (2), Punjab Civil Servants Act, 1974—Special Law, viz. Police Act, 1861 and Rules framed there under having not been repealed expressly or by implication, held further, would prevail over later law of general application i.e Punjab Civil Servants Act, 1974 and Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974— {Interpretation of statutes—Civil services}

{p.173}J

The Civil Servant Act is an Act of general application and it has no constitutional status. Accordingly, it is as much a law as the Police Act of 1861 with the added distinction that it is of general application while the Police Act is of special application to the officers of the subordinate ranks of the Police force. The same is true with the rules. In this view of the matter, the question as to which would prevail over the other in case of inconsistency is of no difficulty. It should not be forgotten that the Police Act and the rules framed there-under are such as would be applicable to a disciplined force only while the Civil Servants Act cannot serve this purpose. {p.173}K.

The house discussed the case threadbare in light of the above rules/orders and decided that:-

The decision of the Honourable High Court dated 24.04.2013 is required to be agitated in the Apex Court and directed the AIG/Legal CPO to move for a CPLA through Law Department Govt: of Khyber Pakhtunkhwa.

- a) A Sub-Committee consisting of Addl: IGP/HQrs., Addl: IGP/Ops, Addl: IGP/S.B, DIG/HQrs, AIG/Estab: and a representative from Legal Branch was constituted to look-into the affairs of Legal Branch, prepare Service Structure and submit recommendation to the PPO / Khyber Pakhtunkhwa by 10.06.2013.
- b) A case be prepared immediately for promotion of Legal officers to the next higher ranks on their available vacancies by 10.06.2013.

2. SENIORITY DISPUTE OF DSP (Executive)

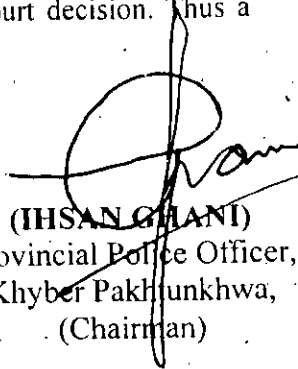
The house deliberately discussed the seniority case of DSP in light of court decision and Police Rules chapter 12.13.

Police Rule 12.2 (3) is reproduced below:-

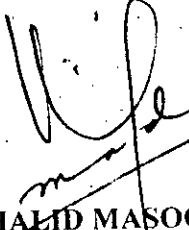
(3) All appointments of enrolled police officers are on probation according to the rules in this Chapter applicable to each rank.

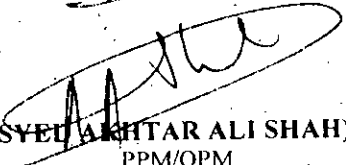
Seniority, in the case of upper subordinates, will be reckoned in the first instance from date of first appointment, officers promoted from a lower rank being considered senior to persons appointed direct on the same date, and the seniority of officers appointed direct on the same date being reckoned according to age. Seniority shall, however be finally settled by dates of confirmation.


The house unanimously decided that all the DSsP shall be given seniority as per their date of confirmation in light of Police Rule 12.2 (3) in the rank of SI and not from the date of appointment/promotion as ASI. The Provisional Seniority List of DSsP issued vide No. S/292-328/13, dated 11.01.2013 is set aside and the seniority list of DSsP as stood on 20.03.2012 is restored in its original shape by giving seniority to the DSP/Muhammad Idrees and Younas Javed Mirza as per court decision. Thus a final seniority list of DSP be issued according to Police Rules.


(IHSAN GHANI)
Provincial Police Officer,
Khyber Pakhtunkhwa,
(Chairman)

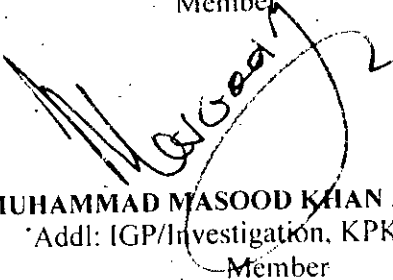

(MIAN MUHAMMAD ASIF)
Addl: IGP/Ops & Trg: KPK
Member

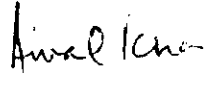

(KHALID MASOOD)
Addl: IGP/HQrs: KPK
Member



(SYED AKHTAR ALI SHAH)
PPM/QPM
Addl: IGP/Special Branch, KPK
Member

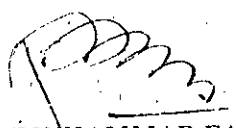

(LIAQAT ALI KHAN)
CCPO, Peshawar
Member


(AMIR HAMZA MAHSUD)
Addl: IGP/Commandant, RRP, KPK
Member


(MUHAMMAD MASOOD KHAN AFRIDI)
Addl: IGP/Investigation, KPK
Member


(AWAL KHAN)
DIG/HQrs:
Member


(SYED FIDA HASSAN SHAH)
AIG/Establishment
Member


(MUHAMMAD FAYYAZ)
AIG/Legal
Member

4/4

شماره حساب 332 / 415 / 365 / B PS یعقوب قاسم
شماره 1119113

در حساب الله خزانه

From : The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

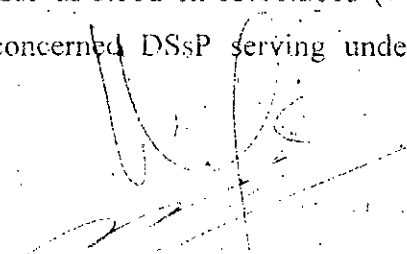
To : All Addl: IsGP in Khyber Pakhtunkhwa.
The CCPO, Peshawar.
All RPOs in Khyber Pakhtunkhwa.
The Commandant, PTC, Hangu.
The DIG/Traffic, KPK, Peshawar.
The Director, ACE, KPK, Peshawar.

No. S/3237-52/13, dated Peshawar, the 07/06/2013.

Subject: **FINAL SENIORITY LIST OF DSsP
AS STOOD ON 05.06.2013.**

Memo:

A copy of Final Seniority List of DSsP as stood on 05.06.2013 (7-pages) is enclosed herewith, for circulation amongst all the concerned DSsP serving under your command, for their information.


(KHALID MASOOD)
Addl: IGP/HQrs:
For Provincial Police Officer
Khyber Pakhtunkhwa,
Peshawar.

FINAL SENIORITY LIST OF DEPUTY SUPERINTENDENTS OF POLICE BPS-17 AS STOOD ON 05.06.2013

No. 3236 /2013. As unanimously decided in the in-house meetings held on 27th May & 29th May, 2013 that all DSsP shall be given seniority as per their date of confirmation in the light of Police Rule-12.2 (3) in the rank of SI and not from the date of appointment/promotion as ASI. The Provisional Seniority list of DSsP issued vide No. S/292-328/13, dated 11.01.2013 is set aside and the seniority list of DSsP as stood on 20.03.20102 is restored in its original shape by giving seniority to the DSsP Muhammad Idrees and Younas Javed Mirza in light of Courts decision.

S/NO.	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
1.	Mr. Faridullah	F.A	11.01.1954 DIKhan	27.03.1974	24.08.2006	17	By Promotion	
2.	Mr. Aziz Muhammad	MA/LLB	11.07.1957 Nowshera	19.8.82 as PSI	24.08.2006	17	By Promotion	Assigned revised seniority as per Service Tribunal judgement dated 12.01.2012.
3.	Mr. Muhammad Idrees	F.A	04.05.1954 DIKhan	28.03.1975	24.08.2006	17	By Promotion	Assigned revised seniority as per Service Tribunal judgments dated 12.01.2012 and Peshawar High Court Peshawar dated 21.12.2012.
4.	Mr. Younas Javed	B.A	21.01.1957 Bannu	28.03.1975	24.08.2006	17	By Promotion	Assigned revised seniority vide this office letter No. S/1777-1803/12, dated 13.03.2012.
5.	Mr. Akbar Ali	B.A	14.06.1956 Swat	01.05.1975	07.08.2007	17	By Promotion	
6.	Mr. Sher Muhammad	F.A	04.01.1954 Mansehra	28.09.1971	24.08.2006	17	By Promotion	
7.	Mr. Riaz Hussain	M.A	03.03.1957 MKD Agency	01.04.1977	24.08.2006	17	By Promotion	
8.	Mr. Muhammad Younas Khan	B.A	04.04.1955 MKD Agency	01.04.1977	24.08.2006	17	By Promotion	
9.	Mr. Shah Nazar	B.A	01.04.1959 Kohistan	25.03.1979	24.08.2006	17	By Promotion	
10.	Mr. Rasool Shah	B.A	01.10.1959 Kohistan	25.03.1979	24.08.2006	17	By Promotion	
11.	Mr. Ghulam Habib	F.A	01.01.1955 Swabi	28.11.1975	23.02.2009	17	By Promotion	Assigned revised seniority vide Order No. S/21-31/12, dated 02.01.2012.
12.	Syed Imtiaz Ali Shah	B.A	15.04.1954 Peshawar	28.11.1975	23.02.2009	17	By Promotion	Assigned revised seniority vide this office Notification No. S/1312/09, dt. 04.03.2009
13.	Mr. Ihsanullah Khan	F.A	16.09.1956 Peshawar	28.11.1975	07.08.2007	17	By Promotion	
14.	Mr. Rahatullah	10 th	20.04.1958 Peshawar	28.11.1975	07.08.2007	17	By Promotion	Assigned revised seniority vide Order No. S/2613-24/12, dated 09.04.2012.
15.	Mr. Muhammad Javed	F.A	04.01.1957 Peshawar	10.04.1977	07.08.2007	17	By Promotion	He has been given revised Seniority vide letter No. S/941-81/10, dated 06.02.2010
16.	Mr. Asif Jan	F.A	15.08.1953/Bannu	01.12.1976	06.03.2008	17	By Promotion	Assigned revised seniority vide this office letter No. S/1777-1803/12, dated 13.03.2012.
17.	Mr. Hashmat Ali Shah	B.A	20.04.1956 DIKhan	01.12.1975	11.05.2010	17	By Promotion	
18.	Mr. Muhammad Irshad	MA/LLB	10.03.1964 Peshawar	12.12.1991 as PSI	15.09.2007	17	By Promotion	
19.	Syed Israr-ud-Din	B.A	01.03.1959 MKD Agy	01.04.1983	07.08.2007	17	By Promotion	
20.	Mr. Malik Muhammad Tariq	MA/LLB	09.11.1961 DIKhan	10.11.1987	07.08.2007	17	By Promotion	
21.	Mr. Sardar Khan	F.A	30.10.1959 Kohistan	25.03.1979	15.09.2007	17	By Promotion	
22.	Mr. Muhammad Riaz	F.A	09.06.1956 Abbottabad	22.04.1980	10.12.2009	17	By Promotion	He has been given revised seniority vide letter No. S/4177/11, dated 16.07.2011.

S/NO.	NAME OF OFFICER 90	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
23.	Mr. Mehmood Hussain	BA/LLB	25.04.1956 Haripur	01.12.1980	07.08.2007	17	By Promotion	
24.	Mr. Abdul Rashid	F.A	02.05.1956 Bannu	02.04.1977	31.10.2007	17	By Promotion	
25.	Mr. Khalid Naseem	B.A	30.07.1956 Mardan	12.04.1978	31.10.2007	17	By Promotion	
26.	Mr. Muhammad Ajmal	F.A	18.12.1955/Swabi	16.07.1974	23.02.2009	17	By Promotion	Assigned revise seniority vide Notification No. 10299/E-II dt: 16.04.2010
27.	Mr. Sardar Muhammad	B.A	22.10.1956 Mardan	12.04.1978	06.03.2008	17	By Promotion	Assigned revise seniority vide Notification No. 1361/E-II dt: 21.1.2008
28.	Mr. Qamar Zaman	F.A	11.02.1958 Peshawar	15.11.1978	31.10.2007	17	By Promotion	
29.	Mr. Muhammad Sadique	B.A	20.05.1956 Swat	01.07.1977	06.03.2008	17	By Promotion	Assigned revised seniority vide this office letter No. S/1777-1803/12, dated 13.03.2012.
30.	Mr. Zafar Hayat	10 th	11.04.1958 Karachi	18.05.1985	31.10.2007	17	By Promotion	
31.	Mr. Shams ur Rehman	B.A	06.11.1958 Mansehra	07.05.1981	31.10.2007	17	By Promotion	
32.	Mr. Muhammad Ayaz	B.A	14.05.1959 Abbottabad	07.05.1981	23.02.2009	17	By Promotion	Assigned revised seniority vide Order No. S/7187-7200/11, dated 28.12.2011.
33.	Mr. Abdul Aziz Afridi	B.A	02.09.1960 Abbottabad	07.05.1981	31.10.2007	17	By Promotion	
34.	Mr. Javed Iqbal	B.A	09.04.1961 Haripur	07.05.1981	31.10.2007	17	By Promotion	
35.	Mr. Habibullah	F.A	10.06.1957 Battagram	07.05.1981	31.10.2007	17	By Promotion	
36.	Mr. Sajid Khan	B.A	15.06.1958 Mansehra	07.05.1981	31.10.2007	17	By Promotion	
37.	Mr. Abdul Saboor	F.A	10.03.1960 Abbottabad	05.04.1984	31.10.2007	17	By Promotion	
38.	Mr. Gul Zarin	F.A	01.10.1960 Kohistan	05.04.1984	31.10.2007	17	By Promotion	
39.	Mr. Iftikhar Ahmad	FA	10.05.1962 Mansehra	05.04.1984	23.02.2009	17	By Promotion	Assigned revised Seniority vide DSC held on 20.05.2009
40.	Mr. Adam Khan	F.A	17.09.1953 Peshawar	28.11.1975	31.10.2007	17	By Promotion	
41.	Mr. Haroon ur Rashid	B.A	15.03.1955 Nowshera	10.04.1977	31.10.2007	17	By Promotion	
42.	Mr. Sanaullah	10 th	01.01.1959 Bannu	01.01.1971	31.10.2007	17	By Promotion	
43.	Mr. Mushtaq Ahmed	B.A	30.03.1954 DIKhan	12.02.1976	31.10.2007	17	By Promotion	
44.	Mr. Muhammad Pervaz	B.A	10.09.1958 Mardan	10.11.1977	23.02.2009	17	By Promotion	
45.	Mr. Izhar Ahmad	B.A	30.10.1957 Mardan	10.04.1977	23.02.2009	17	By Promotion	
46.	Mr. Inayatullah Shah	B.A/LLB	28.05.1956 Peshawar	10.04.1977	23.02.2009	17	By Promotion	
47.	Mr. Hidayatullah	B.A	15.12.53 Peshawar	27.06.1975	23.02.2009	17	By Promotion	
48.	Mr. Faridullah	10 th	08.10.1954 Bannu	03.05.1973	23.02.2009	17	By Promotion	
49.	Mr. Muhammad Iqbal	M.A/Pol: Sc:	02.06.1955 Bannu	10.11.1987	20.01.2011	17	By Promotion	Assigned revised seniority vide this office letter No. S/1777-1803/12, dated 13.03.2012.
50.	Mr. Kifayatullah	M.A (Pol: SC)	01.12.1962 Bannu	10.11.1987	23.02.2009	17	By Promotion	

S/NO.	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
51.	Mr. Iftikhar ud din	F.A	20.04.1961 Nowshera	08.04.1984	23.02.2009	17	By Promotion	
52.	Mr. Riaz Ahmad	F.A	15.05.1962 Nowshera	05.04.1984	23.02.2009	17	By Promotion	
53.	Haji Imtiaz Ahmed	FA	18.04.1956 Charsadda	10.04.1977	10.12.2009	17	By Promotion	
54.	Mr. Bashir Ahmed	Matric	20.01.1957 L/Marwat	20.12.1975	10.12.2009	17	By Promotion	
55.	Mr. Abdul Hayee	MA (Pol. Sc) B. Ed:	01.04.1965/DIKhan	20.04.1991	10.12.2009	17	By Promotion	
56.	Mr. Ali Rehmat	FA	18.06.1956 Swat	01.04.1980	10.12.2009	17	By Promotion	
57.	Mr. Shahnaz Khan	FA	13.02.1955 Abbottabad	06.04.1977	10.12.2009	17	By Promotion	
58.	Mr. Abdul Malik	FA	28.09.1955 Abbottabad	09.12.1976 as JC 14.04.80 as ASI	10.12.2009	17	By Promotion	
59.	Mr. Zulfiqar Ahmad Tanoli	B Sc	15.05.1968 Haripur	03.01.1987	10.12.2009	17	By Promotion	
60.	Mian Naseeb Jan	MA (Pushto)	04.10.1961 Charsadda	28.04.1983	10.12.2009	17	By Promotion	
61.	Mr. Ihsan Ullah	FA	10.01.1962 Bannu	01.06.1982	10.12.2009	17	By Promotion	
62.	Mr. Muhammad Iqbal	F.A	02.05.1955 Peshawar	28.11.1975	10.12.2009	17	By Promotion	
63.	Mr. Sardar Bahadar	BA	10.05.1962 Mardan	05.04.1984	10.12.2009	17	By Promotion	
64.	Mr. Shakir Ullah	BA	04.08.1956 Kohat	10.11.1977	10.12.2009	17	By Promotion	
65.	Mr. Muhammad Nawaz	BA/LLB	08.05.1959 Mardan	12.04.1978	10.12.2009	17	By Promotion	
66.	Mr. Iftikhar Ali	FA	01.06.1961 Charsadda	09.04.1980	10.12.2009	17	By Promotion	
67.	Mr. Rahim Shah	FA	22.02.1962 Peshawar	01.04.1983	10.12.2009	17	By Promotion	
68.	Mr. Muhammad Arif	FA	03.12.1956 Mardan	14.05.1984	10.12.2009	17	By Promotion	
69.	Pir Shahab Ali Shah	MA/LLB	12.08.1960 Mardan	10.04.1980	10.12.2009	17	By Promotion	
70.	Mr. Khushdil Khan	BA	20.11.1959 Nowshera	05.04.1984	10.12.2009	17	By Promotion	
71.	Mr. Bakhtiar Ahmed	B.A	04.04.1957 Abbottabad	13.04.1980	11.05.2010	17	By Promotion	
72.	Mr. Riaz Ahmed	B.A	10.04.1965 Swabi	05.04.1984	11.05.2010	17	By Promotion	
73.	Mr. Imtiaz Ali	B.A	05.06.1960 Nowshera	05.04.1984	11.05.2010	17	By Promotion	
74.	Mr. Shahid Ahmed	F.A	01.01.1961 Mardan	08.04.1984	20.01.2011	17	By Promotion	He has given revised Seniority in accordance with letter No. SOR-V-I/E&AD/1-14/2005, dated 09.05.2008 due to UN MISSION
75.	Mr. Nowsher Khan	M.A	14.05.1961 Peshawar	07.04.1984	11.05.2010	17	By Promotion	Assigned ante date seniority vide Notification No. S/5898-5942/12, dated 13.08.2012.
76.	Mr. Sajjad Ali	F.A	05.05.1958 Peshawar	05.04.1984	13.06.2011	17	By Promotion	He has been given revised Seniority.
77.	Mr. Tariq Sohail	B.A	15.04.1963 Bannu	05.04.1984	13.06.2011	17	By Promotion	He has been given revised Seniority.
78.	Mr. Jehanzeb Khan Burki	MA/LLB	15.07.1963 Peshawar	05.04.1984	20.01.2011	17	By Promotion	

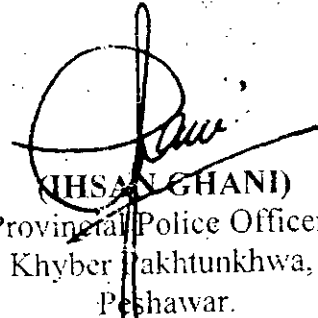
S/NO.	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
79.	Mr. Khan Akbar	F.A	01.06.1965 Peshawar	05.04.1984	20.01.2011	17	By Promotion	
80.	Mr. Shah Jehan	F.A	05.01.1969 Charsadda	05.04.1984	13.06.2011	17	By Promotion	He has been given revised Seniority vide letter No. S/3435/11, dated 13.06.2011.
81.	Mian Muhammad Riaz	M.A	10.02.1958 Charsadda	31.12.1980	20.01.2011	17	By Promotion	
82.	Mr. Muhammad Javed Khan	F.A	15.04.1960 Peshawar	10.11.1987	20.01.2011	17	By Promotion	
83.	Mr. Fazal Ahmed Jan	M.A/LLB	02.04.1962 Peshawar	10.11.1987	20.01.2011	17	By Promotion	
84.	Mr. Saleem Riaz	F.A	25.06.1965 Peshawar	18.11.1987	20.01.2011	17	By Promotion	
85.	Mr. Sarfaraz Ali Shah	B.A	29.08.1960 Peshawar	16.04.1991	20.01.2011	17	By Promotion	
86.	Mr. Waseem Ahmed Khalil	B.A	22.04.1962 Peshawar	16.04.1991	20.01.2011	17	By Promotion	
87.	Mr. Muhammad Ashfaq	B.A	01.04.1971 Charsadda	16.04.1991	20.01.2011	17	By Promotion	
88.	Mr. Muhammad Zahir Shah	F.A	09.03.1955 Peshawar	08.01.1975	20.01.2011	17	By Promotion	
89.	Mr. Lal Farid	F.A	15.11.1957 Karak	15.11.1975	20.01.2011	17	By Promotion	
90.	Mr. Mushtaq Hussain	F.A	19.09.1953 Kohat	22.04.1978	20.01.2011	17	By Promotion	
91.	Mr. Zain Khan	M.A/LLB	01.04.1960 Mardan	06.02.1990	20.01.2011	17	By Promotion	
92.	Mr. Shahzada Kokab Farooq	M.A	13.12.1969 DIKhan	20.04.1991	20.01.2011	17	By Promotion	
93.	Mr. Baz Mir	10 th	01.10.1957 Kohistan	07.05.1981	20.01.2011	17	By Promotion	
94.	Mr. Arif Javed	B.A	08.02.1964 Haripur	10.11.1987	20.01.2011	17	By Promotion	
95.	Mr. Akhtar Ali	B.A	04.02.1955 Nowshera	20.06.1977	20.01.2011	17	By Promotion	
96.	Mr. Aman Ullah	B.A	09.07.1964 Bannu	20.04.1991	20.01.2011	17	By Promotion	
97.	Mr. Ahmed Nawaz	F.A	09.09.1954 Haripur	19.04.1980	20.01.2011	17	By Promotion	
98.	Mr. Tariq Mehmood	B.A	28.04.1965 Abbottabad	25.04.1991	30.06.2011	17	By Promotion	He has been given revised Seniority.
99.	Mr. Ijaz Ahmed	B.A	15.06.1966 Abbottabad	28.04.1991	20.01.2011	17	By Promotion	
100.	Mr. Janas Khan	B.A	10.02.1965 Haripur	25.09.1987	20.01.2011	17	By Promotion	
101.	Mr. Mukhtiar Ahmad	F.A	04.02.1969 Abbottabad	28.04.1991	30.06.2011	17	By Promotion	He has been given revised Seniority.
102.	Mr. Muhammad Suleman	B.Sc	28.07.1970 Mansehra	28.04.1991	30.06.2011	17	By Promotion	He has been given revised Seniority.
103.	Mr. Saeed Ahmed	F.A	06.04.1966 Haripur	26.04.1991	20.01.2011	17	By Promotion	
104.	Mr. Asif Gohar	10 th	07.08.1964 Mansehra	28.12.1985	20.01.2011	17	By Promotion	
105.	Mr. Hafeez Ur Rehman	F.A	01.07.1957 Abbottabad	26.09.1975	20.01.2011	17	By Promotion	
106.	Mr. Muhammad Shaukat	10 th	10.02.1956 Abbottabad	25.04.1974	13.06.2011	17	By Promotion	He has been given revised Seniority.
107.	Mr. Khaista Rehman	F.A	30.03.1956 Dir Upper	20.08.1970	20.01.2011	17	By Promotion	
108.	Mr. Riaz ud Din	F.A	16.05.1955 Karak	22.04.1978	30.06.2011	17	By Promotion	

S/NO.	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
109.	Mr. Shams ur Rahman	B.A	01.09.1954 Chitral	01.04.1978	30.06.2011	17	By Promotion	
110.	Mr. Fazal Haleem Jan	F.A	27.03.1954 Mkd: Agency	05.11.1973	30.06.2011	17	By Promotion	
111.	Mr. Muhammad Saleem	F.A	05.02.1954 Mkd: Agency	01.04.1980	30.06.2011	17	By Promotion	
112.	Mr. Aamir Shahzad	M.A	09.08.1968 Peshawar	16.04.1991	30.06.2011	17	By Promotion	
113.	Mr. Amir Muhammad	B.A	07.01.1970 Mkd:	25.04.1991	19.03.2012	17	By Promotion	Assigned revised seniority vide this office Notification No. S/5898-5942/12, dated 13.08.2012.
114.	Mr. Jehanzeb Khan	B.A/LLB	21.02.1959 Dir	30.03.1980	30.06.2011	17	By Promotion	
115.	Mr. Naveed Iqbal	F.A	14.03.1954 Swat	01.04.1980	30.06.2011	17	By Promotion	
116.	Mr. Muhammad Idrees	10th	18.12.1957 Peshawar	04.12.1976	30.06.2011	17	By Promotion	
117.	Mr. Fazal Rabbi	B. Sc	01.05.1954 Swat	01.04.1980	30.06.2011	17	By Promotion	
118.	Mr. Ali Muhammad Bogra	B.A	01.02.1956 Mkd: Agency	01.04.1980	30.06.2011	17	By Promotion	
119.	Mr. Nisar Ahmad	BA/LLB	25.03.1960 Mardan	27.04.1987	30.06.2011	17	By Promotion	
120.	Mr. Zar Wali	10th	04.12.1957 Bannu	15.04.1976	30.06.2011	17	By Promotion	
121.	Mr. Hameedullah	9 th	01.05.1957 DIKhan	06.11.1975	19.03.2012	17	By Promotion	
122.	Mr. Bashir Khan	B.A	05.05.1954 Bannu	24.11.1974	19.03.2012	17	By Promotion	
123.	Mr. Gul Naseeb	F.Sc	09.11.1968 Bannu	24.04.1991	19.03.2012	17	By Promotion	
124.	Mr. Waqar Ahmad	B.A	03.01.1968 Nowshera	02.10.1988	19.03.2012	17	By Promotion	
125.	Mr. Muhammad Shafiq	B.A	13.01.1963 Bannu	29.04.1991	19.03.2012	17	By Promotion	
126.	Mr. Hamidullah Khan	10 th	01.01.1957 Mardan	21.01.1969	19.03.2012	17	By Promotion	
127.	Mr. Muhammad Arif	MA	10.03.1969 Peshawar	16.04.1991	19.03.2012	17	By Promotion	
128.	Mr. Rafiullah	10 th	19.04.1960 Kohat	20.01.1980	19.03.2012	17	By Promotion	
129.	Mr. Tahir ur Rahman	B.A	28.02.1969 Haripur	18.04.1991	19.03.2012	17	By Promotion	
130.	Mr. Abdul Ghafoor	Matric	24.05.1957 DIKhan	14.10.1975	31.03.2012	17	By Promotion	Assigned ante date seniority vide Notification No. S/5898-5942/12, dated 13.08.2012.
131.	Mr. Darvaish Ali	B.A/LLB	14.06.1962 Mardan	08.04.1984	19.03.2012	17	By Promotion	
132.	Mr. Tauheed Khan	B.A	20.10.1963 DIKhan	17.05.1983	19.03.2012	17	By Promotion	
133.	Mr. Salah-ud-Din	MA	15.01.1970 Tank	01.02.1995	16.10.2012	17	By Promotion	
134.	Mr. Gul Nawaz	MA	02.12.1959 Swabi	27.04.1991	31.03.2012	17	By Promotion	
135.	Mr. Noor Jamal	MA	10.01.1966 Mardan	27.04.1991	31.03.2012	17	By Promotion	
136.	Mr. Muhammad Arif	BA	22.04.1964 Bannu	25.04.1991	16.10.2012	17	By Promotion	
137.	Mr. Tariq Habib	MA	05.09.1968 Peshawar	21.12.1994	31.03.2012	17	By Promotion	
138.	Mr. Nisar Ahmad	B.A	02.11.1973 Charsadda	21.12.1994	31.03.2012	17	By Promotion	
139.	Mr. Aslam Nawaz	MA/LLB	01.03.1972 Bannu	11.01.1995	31.03.2012	17	By Promotion	

S/NO.	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF ENTRY INTO GOVT. SERVICE	DATE	PAY SCALE	METHOD OF RECRUITMENT
140.	Mr. Tariq Iqbal	M. Sc/LLB	13.04.1974 Peshawar	21.12.1994	31.03.2012	17	By Promotion
141.	Mr. Sanaullah	BA	10.01.1969 Lakki	29.04.1991	31.03.2012	17	By Promotion
142.	Mr. Bahruddin	BA	31.08.1954 Swat	30.11.1971	31.03.2012	17	By Promotion
143.	Mr. Ali Rehman	BA/LLB	15.04.1955 Swat	01.04.1983	16.10.2012	17	By Promotion
144.	Mr. Sher Hussain	FA	08.05.1956 Dir (L)	01.04.1983	16.10.2012	17	By Promotion
145.	Mr. Mubarak Khan	FA	04.03.1957 Swat	01.04.1983	16.10.2012	17	By Promotion
146.	Mr. Riaz Ahmad	BA	01.01.1960 Mkd: Agy:	01.04.1983	16.10.2012	17	By Promotion
147.	Mr. Bakht Zada	BA	15.02.1962 Bunir	01.04.1983	16.10.2012	17	By Promotion
148.	Mr. Quaid Kamal	BA	01.01.1963 Charsadda	14.05.1984	16.10.2012	17	By Promotion
149.	Mr. Banaras Khan	BA	05.01.1962 Nowshera	12.01.1980	16.10.2012	17	By Promotion
150.	Mr. Shafiullah	MA	01.04.1971 DIKhan	01.02.1995	16.10.2012	17	By Promotion
151.	Mr. Abdul Waheed Khan	F.A	10.07.1967 Mansehra	23.02.1987	07.05.2013	17	By Promotion
152.	Mr. Munir Hussain	BA	30.05.1966 Mansehra	28.04.1991	16.10.2012	17	By Promotion
153.	Mr. Qamar Hayat	BA	18.04.1971 Haripur	13.12.1994	16.10.2012	17	By Promotion
154.	Mr. Zulfiqar Khan Jadoon	10 th	15.06.1963 Abbottabad	13.03.1982	25.03.2013	17	By Promotion
155.	Mr. Shaukat Zaman	10 th	04.05.1955 Haripur	04.09.1973	16.10.2012	17	By Promotion
156.	Mr. Arshad Masood	10 th	26.04.1955 Abbottabad	04.09.1973	16.10.2012	17	By Promotion
157.	Mr. Nazir Ahmad	MA/B. Ed	02.02.1970 Abbottabad	29.07.1998	16.10.2012	17	By Promotion
158.	Mr. Saeed Akhtar	M. Sc	02.02.1971 Haripur	29.07.1998	16.10.2012	17	By Promotion
159.	Mr. Muhammad Ayaz	B. Sc	03.03.1975 Abbottabad	29.07.1998	16.10.2012	17	By Promotion
160.	Mr. Muhammad Jamil Akhtar	F. Sc	22.02.1977 Haripur	29.07.1998	16.10.2012	17	By Promotion
161.	Mr. Muhammad Azeem	8 th	06.01.1958 Abbottabad	04.11.1970	25.03.2013	17	By Promotion
162.	Mr. Khurshid Ahmad	B.A	05.07.1958 Mansehra	10.09.1998	16.10.2012	17	By Promotion
163.	Mr. Abdul Aziz	FA	04.06.1957 Haripur	21.10.1975	16.10.2012	17	By Promotion
164.	Mr. Falak Niaz	MA	01.04.1965 Swabi	27.04.1991	16.10.2012	17	By Promotion
165.	Mr. Ishtiaq Ahmad	BA	01.11.1971 Lakki	09.01.1995	16.10.2012	17	By Promotion
166.	Mr. Hidayatullah	10 th	14.05.1961 DIKhan	08.08.1979	16.10.2012	17	By Promotion
167.	Mr. Arbab Khan	10 th	03.12.1956 Lakki	24.11.1976	16.10.2012	17	By Promotion
168.	Mr. Riaz-ul-Islam	10 th	03.04.1961 Bannu	08.09.1979	16.10.2012	17	By Promotion
169.	Mr. Shaukat Ali	B. Sc	05.03.1971 Swabi	23.01.1995	16.10.2012	17	By Promotion
170.	Mr. Abdul Samad	M.A	14.04.1969 Swabi	27.11.1994	25.03.2013	17	By Promotion
171.	Mr. Mushtaq Ahmad	M.A	15.03.1970 Swabi	27.11.1994	25.03.2013	17	By Promotion
172.	Mr. Sajjad Ahmad	M.A	01.04.1968 Swabi	27.11.1994	25.03.2013	17	By Promotion

Assigned revised seniority vide Notification No. 1535-50/E-II, dated 18.01.2013.

				GOVT. SERVICE		SCALE	RECRUITMENT
173.	Mr. Tahir Iqbal	M.A (Pol: Sc)	20.01.1969 Abbottabad	27.11.1994	25.03.2013	17	By Promotion
174.	Mr. Muhammad Javed	10 th	15.03.1956 Abbottabad	19.06.1991	25.03.2013	17	By Promotion
175.	Mr. Muhammad Saleem	8 th	01.01.1958 Abbottabad	24.08.1995	25.03.2013	17	By Promotion
176.	Mr. Muhammad Saddique	10 th	20.02.1957 Mansehra	30.09.1975	25.03.2013	17	By Promotion
177.	Mr. Aurangzeb	10 th	05.02.1954 Mansehra	01.04.1972	25.03.2013	17	By Promotion
178.	Mr. Abdur Rashid Marwat	10 th	30.03.1963 Lakki	15.02.1982	25.03.2013	17	By Promotion
179.	Mr. Muzamil Shah	M.A	08.03.1972 Swabi	27.11.1994	25.03.2013	17	By Promotion
180.	Mr. Niaz Muhammad	M.A/LLB	11.02.1971 Swabi	27.11.1994	25.03.2013	17	By Promotion
181.	Mr. Shah Hassan	M.A	01.05.1968 Mardan	27.11.1994	08.04.2013	17	By Promotion
182.	Mr. Sahibzada-Sajjad Ahmad	B.A	02.02.1971 Swabi	27.11.1994	08.04.2013	17	By Promotion


(IHSAN GHANI)
 Provincial Police Officer,
 Khyber Pakhtunkhwa,
 Peshawar.

I

BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR

Service Appeal No.626/2013

Inayat Ullah Shah DSP..... (Appellant).

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa and others

.....(Respondents).

Subject: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully Sheweth:-

Preliminary objections:-

- a. That the appeal of appellant is not maintainable in the present form.
- b. That the appeal is bad for misjoinder/nonjoinder of necessary parties.
- c. That the appellant is estopped by his own conduct to file the present appeal at this stage.
- d. That the appeal of appellant is badly barred by time.
- e. That appellant being a Police officer is governed under the Police Rules 1934 read with Police order 2002 and not under the Civil Servants Act 1973.
- f. That the appeal of appellant is based on no facts and appellant has got no cause of action.

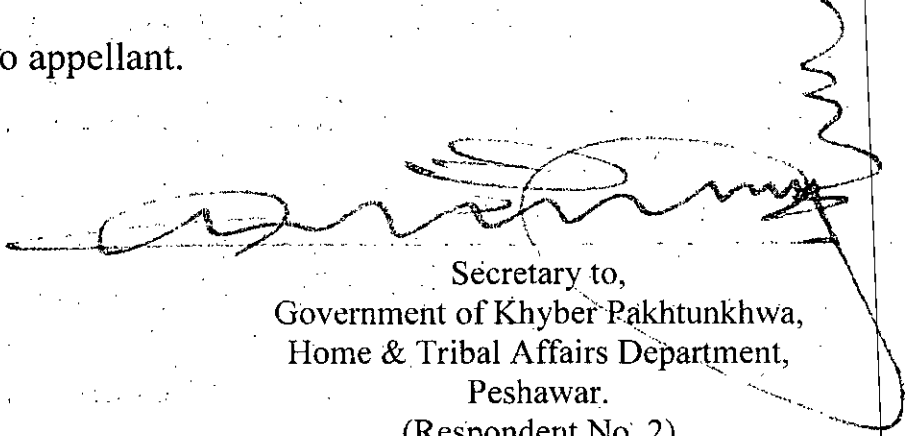
Facts:-

1. Correct to the extent that appellant was appointed as temporary ASI in the year 1977 and was confirmed in the rank of ASI in the year 1980 after completion of probation period. Appellant has wrongly contended antedated confirmation at this belated stage after lapse of about 33 years long period.
2. This Para of the facts of appeal pertains to record of service of appellant therefore needs no comments.

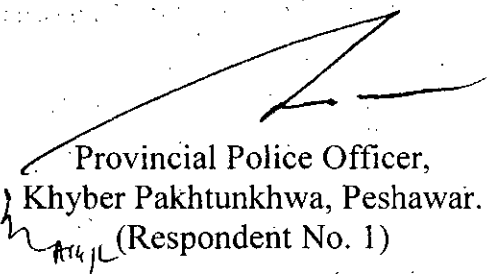
3. This Para is related to tribunal, however, the confirmation and seniority of junior ranks of Police officers (constable to Inspectors) is governed by Police rules wherein separate criteria for confirmation and seniority have been provided. Promotion from one rank to another is subject to qualification of certain courses and experience.
4. This Para is related to court/tribunal decision therefore needs no comments.
5. The Departmental Representation filed by the appellant and others were taken up for consideration and decision during in House Committee meeting held on 27.05.2013 and 29.05.2013 in conference Room of CPO Khyber Pakhtunkhwa Peshawar under the chairmanship of Provincial Police Officer Khyber Pakhtunkhwa wherein unanimous decision was made that all the DSsP shall be given seniority as per their date of confirmation in the light of Police Rules 12-2(3) of 1934 in the rank of SI and not from the date of appointment/promotion as ASI. Accordingly seniority list of DSsP was revised. Copy of the minutes of the in House meeting is enclosed as Annexure "A" while revised list of DSsP as stood on 05.06.2013 is enclosed as Annexure "B".
6. Incorrect, however it is pointed out that all the DSsP were given equal treatment and protection of law and no discrimination was meted out to any Police Officers of senior or junior rank of Police.
7. This Para has already been explained while answering Para 5 of the appeal therefore need no further comments.

8. That the appellant was confirmed as ASI after the completion of probation period of 03 year, in accordance with Police Rules.
9. Incorrect, the Police Officers, being member of disciplined force are governed under Police rules and not under the Civil Servant Act 1973. The seniority of the Police Officers is always determined/fixed in accordance with Police Rules 12-2(3) read with 12-8 of 1934.
10. This Para is not concerning junior ranks of Police.
11. This Para is related to decision of Apex Court hence no comments.
12. That the respondents may also be allowed to raise additional points during hearing of the case.

It is therefore requested that appeal filed by the appellant may be dismissed being time barred and in conflict with the Rules applicable to appellant.



Secretary to,
Government of Khyber Pakhtunkhwa,
Home & Tribal Affairs Department,
Peshawar.
(Respondent No. 2)



Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)

4

BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.626/2013

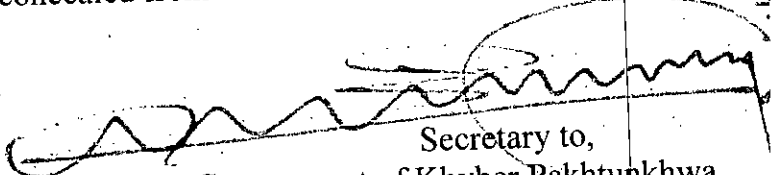
Inayat Ullah Shah DSP..... (Appellant).

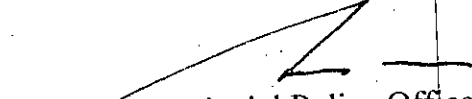
VERSUS

Provincial Police Officer Khbyer Pakhtunkhwa and others

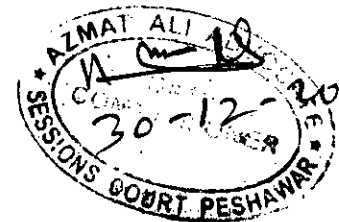
Subject:- **AFFIDAVIT.**

We the respondents in the above cited service appeal do hereby solemnly affirm that the contents of reply are correct to the best of our knowledge and belief. Nothing has been concealed from this honorable Tribunal.


Secretary to,
Government of Khyber Pakhtunkhwa,
Home & Tribal Affairs Department,
Peshawar.
(Respondent No.2)


Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)

ATTESTED



MINUTES OF IN-HOUSE MEETING

In house meetings were held in two phases 1st on 27th May, 2013 and the 2nd on 29th May, 2013 at Conference Room CPO Peshawar under the Chairmanship of Mr. Ihsan Ghani Provincial Police Officer Khyber Pakhtunkhwa. Representatives from Executive and Legal branches also participated. The following cases were discussed in detail:-

1. Case-regarding Joint Seniority of Executive and Legal Branches in light of judgement of Peshawar High Court dated 24.04.2013.
 2. Determination of Seniority of DSsP in the light of Courts judgments.
1. Case regarding Joint Seniority of Executive and Legal Branches in light of judgement of Peshawar High Court dated 24.04.2013.

The Honourable High Court Peshawar in its Judgement dated 24.04.2013 in Writ Petition No. 1680-P/2012 filed by Mian Mustafa Gul DSP Legal/Asstt Director, ACE, Peshawar directed the respondent Department (Police Department) to issue combined Seniority List of two Branches of the Police Department i.e Legal and Executive and thereafter make promotions on the basis of seniority cum fitness in accordance with law in terms of Article 8 (2) (p) of the Police order, 2002.

Abstracts from the Police Rules and Court judgments were put before the House, which are reproduced below:-

1446327/213
Police Rule 12.6 (3) (c)

After recruitment, no Inspector Legal shall be allowed change of cadre from Inspector Legal to the Executive or any other branch in the Police Department.

Article 8 (2) P of Police Order-2002.

Article 8. Police to be organized on functional basis:-

(1) The Police establishment constituted under Article 7 shall, as far as practicable, be organized on functional basis in to branches, divisions, bureaus and sections.

(2) The branches, divisions, bureaus and sections referred to in clause (1) may include- (a) Investigation; (b) Intelligence; (c) Watch and Ward; (d) Reserve Police; (e) Police Accountability; (f) Personnel Management; (g) Education and Training; (h) Finance and Internal Audit (i) Crime Prevention; (j) Crime against women; (k) Traffic Planning and Management; (l) Criminal Identification; (m) Information Technology; (n) Transport; (o) Research and Development; (p) Legal Affairs; (q) Welfare; (r) Estate management;

RSI
 9/5/13
 88

PLD 1985 Supreme Court 159

Present: Muhammad Haleem, C.J., Muhammad Afzal Zullah, Shafiqur Rahman and Mian Buranuddin Khan, Inspector General of Police, Punjab, Lahore and others-Appellants.

Criteria for determining seniority of subordinate ranks of Police force, held, would be provided by R. 12.2, Police rules, 1934 as from dates of their confirmation and not from date of continuous appointment in the grade as laid down in Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974, r. 8 (1) (6) read with S. 7 (2), Punjab Civil Servants Act, 1974—Special Law, viz. Police Act, 1861 and Rules framed there under having not been repealed expressly or by implication, held further, would prevail over later law of general application i.e Punjab Civil Servants Act, 1974 and Punjab Civil Servants (Appointment and Conditions of Service) Rules, 1974— {Interpretation of statutes—Civil services}

{p.173}J

The Civil Servant Act is an Act of general application and it has no constitutional status. Accordingly, it is as much a law as the Police Act of 1861 with the added distinction that it is of general application while the Police Act is of special application to the officers of the subordinate ranks of the Police force. The same is true with the rules. In this view of the matter, the question as to which would prevail over the other in case of inconsistency is of no difficulty. It should not be forgotten that the Police Act and the rules framed there-under are such as would be applicable to a disciplined force only while the Civil Servants Act cannot serve this purpose. {p.173}K.

The house discussed the case threadbare in light of the above rules/orders and decided that:-

The decision of the Honourable High Court dated 24.04.2013 is required to be agitated in the Apex Court and directed the AIG/Legal CPO to move for a CPLA through Law Department Govt. of Khyber Pakhtunkhwa.

- a) A Sub-Committee consisting of Addl: IGP/HQrs., Addl: IGP/Ops. Addl: IGP/S.B, DIG/HQrs, AIG/Estab: and a representative from Legal Branch was constituted to look-into the affairs of Legal Branch, prepare Service Structure and submit recommendation to the PPO / Khyber Pakhtunkhwa by 10.06.2013.
- b) A case be prepared immediately for promotion of Legal officers to the next higher ranks on their available vacancies by 10.06.2013.

2. SENIORITY DISPUTE OF DSP (Executive)

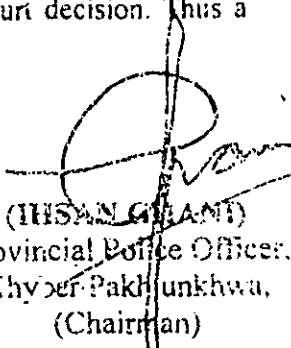
The house deliberately discussed the seniority case of DSP in light of court decision and Police Rules chapter 12.13.

Police Rule 12.2 (3) is reproduced below:-

(3) All appointments of enrolled police officers are on probation according to the rules in this Chapter applicable to each rank

Seniority in the case of upper subordinates, will be reckoned in the first instance from date of first appointment, officers promoted from a lower rank being considered senior to persons appointed direct on the same date, and the seniority of officers appointed direct on the same date being reckoned according to age. Seniority shall, however be finally settled by dates of confirmation.


The house unanimously decided that all the DSsP shall be given seniority as per their date of confirmation in light of Police Rule 12.2 (3) in the rank of SI and not from the date of appointment/promotion as ASI. The Provisional Seniority List of DSsP issued vide No. S/292-328/13, dated 11.01.2013 is set aside and the seniority list of DSsP as stood on 20.03.2012 is restored in its original shape by giving seniority to the DSP/Muhammad Idrees and Younas Javed Mirza as per court decision. Thus a final seniority list of DSP be issued according to Police Rules.


(IHSAN GILANI)
Provincial Police Officer,
Khyber Pakhtunkhwa,
(Chairman)



(MIAN MUHAMMAD ASIF)
Addl: IGP/Ops & Trg: KPK
Member


(KHALID MASOOD)
Addl: IGP/HQrs: KPK
Member



(SYED AMRATAR ALI SHAH)
PPM/QPM
Addl: IGP/Special Branch, KPK
Member



(LIAQAT ALI KHAN)
CCPO, Peshawar
Member


(AMIR HAMZA MAHSUD)
Addl: IGP/Commandant, IRP, KPK
Member


(MUHAMMAD MASOOD KHAN AFRIDI)
Addl: IGP/Investigation, KPK
Member


(AWAL KHAN)
DIG/HQrs:
Member


(SYED FIDA HASSAN SHAH)
AIG/Establishment
Member


(MUHAMMAD FAYYAZ)
AIG/Legal
Member

8 . ANNEXURE - 13

Tele Phone No. 091-9210457
Fax No. 091-9213165/9210927

From : The Provincial Police Officer.
Khyber Pakhtunkhwa, Peshawar.

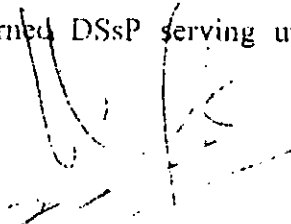
To : All Add: IsGP in Khyber Pakhtunkhwa.
The CCPO, Peshawar.
All RPOs in Khyber Pakhtunkhwa.
The Commandant, PTC, Hangu.
The DIG/Traffic, KPK, Peshawar.
The Director, ACE, KPK, Peshawar.

No. S/3237-52/13. dated Peshawar, the 07/06/2013.

Subject: **FINAL SENIORITY LIST OF DSsP**
AS STOOD ON 05.06.2013.

Memo:

A copy of Final Seniority List of DSsP as stood on 05.06.2013 (7-pages) is enclosed herewith, for circulation amongst all the concerned DSsP serving under your command. for their information.


(KHALID MASOOD)
Add: IGP/HQs:
For Provincial Police Officer
Khyber Pakhtunkhwa,
Peshawar. ↓

FINAL SENIORITY LIST OF DEPUTY SUPERINTENDENTS OF POLICE BPS-17 AS STOOD ON 05.06.2013

No. S/ 3236 /2013. As unanimously decided in the in-house meetings held on 27th May & 29th May, 2013 that all DSsP shall be given seniority as per their date of confirmation in the light of Police Rule-12.2 (3) in the rank of SI and not from the date of appointment/promotion as ASI. The Provisional Seniority list of DSsP issued vide No. S/292-328/13, dated 11.01.2013 is set aside and the seniority list of DSsP as stood on 20.03.20102 is restored in its original shape by giving seniority to the DSsP Muhammad Idrees and Younas Javed Mirza in light of Courts decision.

S/NO.	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
1.	Mr. Faridullah	F.A	11.01.1954 DIKhan	27.03.1974	24.08.2006	17	By Promotion	
2.	Mr. Aziz Muhammad	MA/LLB	11.07.1957 Nowshera	19.8.82 as PSI	24.08.2006	17	By Promotion	
3.	Mr. Muhammad Idrees	F.A	04.05.1954 DIKhan	28.03.1975	24.08.2006	17	By Promotion	Assigned revised seniority as per Service Tribunal judgment dated 12.01.2012
4.	Mr. Younas Javed	B.A	21.01.1957 Bannu	28.03.1975	24.08.2006	17	By Promotion	Assigned revised seniority as per Service Tribunal judgments dated 12.01.2012 and Peshawar High Court Peshawar dated 21.12.2012.
5.	Mr. Akhar Ali	B.A	14.06.1956 Swat	01.05.1975	07.08.2007	17	By Promotion	Assigned revised seniority vide this office letter No. S/177-1803/12, dated 13.05.2012.
6.	Mr. Sher Muhammad	F.A	04.01.1954 Mansehra	28.09.1971	24.08.2006	17	By Promotion	
7.	Mr. Riaz Hussain	MA	03.03.1957 MKD Agency	01.04.1977	24.08.2006	17	By Promotion	
8.	Mr. Muhammad Younas Khan	B.A	04.04.1955 MKD Agency	01.04.1977	24.08.2006	17	By Promotion	
9.	Mr. Shah Nazar	B.A	01.04.1959 Kohistan	25.03.1979	24.08.2006	17	By Promotion	
10.	Mr. Rasool Shah	B.A	01.10.1959 Kohistan	25.03.1979	24.08.2006	17	By Promotion	
11.	Mr. Ghulam Habib	F.A	01.01.1955 Swabi	28.11.1975	23.02.2009	17	By Promotion	Assigned revised seniority vide Order No. S/21-31/12, dated 02.01.2012.
12.	Syed Imtiaz Ali Shah	B.A	15.04.1954 Peshawar	28.11.1975	25.02.2009	17	By Promotion	Assigned revised seniority vide this office Notification No. S/1312/09, dt. 01.03.2009
13.	Mr. Ihsanullah Khan	F.A	16.09.1956 Peshawar	28.11.1975	07.08.2007	17	By Promotion	
14.	Mr. Rahatullah	10 th	20.04.1958 Peshawar	28.11.1975	07.08.2007	17	By Promotion	
15.	Mr. Muhammad Javed	F.A	04.01.1957 Peshawar	10.04.1977	07.08.2007	17	By Promotion	Assigned revised seniority vide Order No. S/2015-24/12, dated 02.04.2012.
16.	Mr. Asif Jan	F.A	15.08.1953/Bannu	01.12.1976	05.03.2006	17	By Promotion	He has been given revised Seniority vide letter No. S/941-51/10, dated 06/02.2010
17.	Mr. Hashmat Ali Shah	B.A	20.04.1956 DIKhan	01.12.1975	11.05.2010	17	By Promotion	Assigned revised seniority vide this office letter No. S/177-1803/12, dated 13.03.2012.
18.	Mr. Muhammad Irshad	MA/LLB	10.03.1964 Peshawar	12.12.1991 as PSI	15.09.2007	17	By Promotion	
19.	Syed Israr-ud-Din	B.A	01.03.1959 MKD Agy	01.04.1983	07.08.2007	17	By Promotion	
20.	Mr. Malik Muhammad Tariq	MA/LLB	09.11.1961 DIKhan	10.11.1987	07.08.2007	17	By Promotion	
21.	Mr. Sardar Khan	F.A	30.10.1959 Kohistan	25.03.1979	15.09.2007	17	By Promotion	
22.	Mr. Muhammad Riaz	F.A	09.06.1956 Abbottabad	22.04.1980	10.12.2009	17	By Promotion	He has been given revised seniority vide letter No. S/177-11, dated 16.07.2011.

	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
23.	Mr. Mehmood Hussain	BA/LLB	25.04.1956 Haripur	01.12.1980	07.08.2007	17	By Promotion	
24.	Mr. Abdul Rashid	F.A	02.05.1956 Bannu	02.04.1977	31.10.2007	17	By Promotion	
25.	Mr. Khalid Naseem	B.A	30.07.1956 Mardan	12.04.1978	31.10.2007	17	By Promotion	Assigned revise seniority vide Notification No. 10299/E-II dt: 16.04.2010
26.	Mr. Muhammad Ajmal	F.A	18.12.1955/Swabi	16.07.1974	23.02.2009	17	By Promotion	Assigned revise seniority vide Notification No. 1361/E-II dt: 21.1.2008
27.	Mr. Sardar Muhammad	B.A	22.10.1956 Mardan	12.04.1978	06.03.2008	17	By Promotion	
28.	Mr. Qamar Zaman	F.A	11.02.1958 Peshawar	15.11.1978	31.10.2007	17	By Promotion	Assigned revised seniority vide this office letter No. S/1777-1803/12, dated 13.03.2012.
29.	Mr. Muhammad Sadique	B.A	20.05.1956 Swat	01.07.1977	06.03.2008	17	By Promotion	
30.	Mr. Zafar Hayat	10 th	11.04.1958 Karachi	18.05.1985	31.10.2007	17	By Promotion	
31.	Mr. Shams ur Rehman	B.A	06.11.1958 Mansehra	07.05.1981	31.10.2007	17	By Promotion	Assigned revised seniority vide Order No. S/7187-7209/11, dated 28.12.2011.
32.	Mr. Muhammad Ayaz	B.A	14.05.1959 Abbottabad	07.05.1981	23.02.2009	17	By Promotion	
33.	Mr. Abdul Aziz Afridi	B.A	02.09.1960 Abbottabad	07.05.1981	31.10.2007	17	By Promotion	
34.	Mr. Javed Iqbal	B.A	09.04.1961 Haripur	07.05.1981	31.10.2007	17	By Promotion	
35.	Mr. Habibullah	F.A	10.06.1957 Battagram	07.05.1981	31.10.2007	17	By Promotion	
36.	Mr. Sajid Khan	B.A	15.06.1958 Mansehra	07.05.1981	31.10.2007	17	By Promotion	
37.	Mr. Abdul Saboor	F.A	10.03.1960 Abbottabad	05.04.1984	31.10.2007	17	By Promotion	
38.	Mr. Gul Zarin	F.A	01.10.1960 Kohistan	05.04.1984	31.10.2007	17	By Promotion	Assigned revised Seniority vide DSC held on 20.05.2009
39.	Mr. Ifikhar Ahmad	FA	10.05.1962 Mansehra	05.04.1984	23.02.2009	17	By Promotion	
40.	Mr. Adam Khan	F.A	17.09.1953 Peshawar	28.11.1975	31.10.2007	17	By Promotion	
41.	Mr. Haroon ur Rashid	B.A	15.03.1955 Nowshera	10.04.1977	31.10.2007	17	By Promotion	
42.	Mr. Sanullah	10 th	01.01.1959 Bannu	01.01.1971	31.10.2007	17	By Promotion	
43.	Mr. Mushtaq Ahmed	B.A	30.03.1954 DIKhan	12.02.1975	31.10.2007	17	By Promotion	
44.	Mr. Muhammad Pervaz	B.A	10.09.1958 Mardan	10.11.1977	23.02.2009	17	By Promotion	
45.	Mr. Izhar Ahmad	B.A	30.10.1957 Mardan	10.04.1977	23.02.2009	17	By Promotion	
46.	Mr. Inayatullah Shah	B.A/I.I.B	28.05.1956 Peshawar	10.04.1977	23.02.2009	17	By Promotion	
47.	Mr. Hidayatullah	B.A	15.12.53 Peshawar	27.06.1975	23.02.2009	17	By Promotion	
48.	Mr. Faridullah	10 th	08.10.1954 Bannu	03.05.1973	23.02.2009	17	By Promotion	Assigned revised seniority vide this office letter No. S/1777-1803/12, dated 13.03.2012.
49.	Mr. Muhammad Iqbal	M.A/Pol: Sc:	02.06.1955 Bannu	10.11.1987	20.01.2011	17	By Promotion	
50.	Mr. Kifayatullah	M.A (Pol: SC)	01.12.1962 Bannu	10.11.1987	23.02.2009	17	By Promotion	

	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
51.	Mr. Ifrikhar ud din	F.A	20.04.1961 Nowshera	08.04.1984	23.02.2009	17	By Promotion	
52.	Mr. Riaz Ahmad	F.A	15.05.1962 Nowshera	05.04.1984	23.02.2009	17	By Promotion	
53.	Haji Imtiaz Ahmed	FA	18.04.1956 Charsadda	10.04.1977	10.12.2009	17	By Promotion	
54.	Mr. Bashir Ahmed	Matric	20.01.1957 L/Marwat	20.12.1975	10.12.2009	17	By Promotion	
55.	Mr. Abdul Hayee	MA (Pol. Sc) B. Ed:	01.04.1965/DIKhan	20.04.1991	10.12.2009	17	By Promotion	
56.	Mr. Ali Rehmat	FA	18.06.1956 Swat	01.04.1980	10.12.2009	17	By Promotion	
57.	Mr. Shahnaz Khan	FA	13.02.1955 Abbottabad	06.04.1977	10.12.2009	17	By Promotion	
58.	Mr. Abdul Malik	FA	28.09.1955 Abbottabad	09.12.1976 as IC 14.04.81 as ASI	10.12.2009	17	By Promotion	
59.	Mr. Zulfiqar Ahmad Tanoli	B Sc	15.05.1968 Haripur	03.01.1987	10.12.2009	17	By Promotion	
60.	Mian Naseeb Jan	MA (Pushro)	04.10.1961 Charsadda	28.04.1983	10.12.2009	17	By Promotion	
61.	Mr. Ihsan Ullah	FA	10.01.1962 Bannu	01.06.1982	10.12.2009	17	By Promotion	
62.	Mr. Muhammad Iqbal	F A	02.05.1955 Peshawar	28.11.1975	10.12.2009	17	By Promotion	
63.	Mr. Sardar Bahadar	BA	10.05.1962 Mardan	05.04.1984	10.12.2009	17	By Promotion	
64.	Mr. Shakir Ullah	BA	04.08.1956 Kohat	10.11.1977	10.12.2009	17	By Promotion	
65.	Mr. Muhammad Nawaz	BA/LLB	08.05.1959 Mardan	12.04.1978	10.12.2009	17	By Promotion	
66.	Mr. Ifrikhar Ali	FA	01.06.1961 Charsadda	09.04.1980	10.12.2009	17	By Promotion	
67.	Mr. Rahim Shah	FA	22.02.1962 Peshawar	01.04.1983	10.12.2009	17	By Promotion	
68.	Mr. Muhammad Arif	FA	03.12.1956 Mardan	14.05.1984	10.12.2009	17	By Promotion	
69.	Pir Shahab Ali Shah	MA/LLB	12.08.1960 Mardan	10.04.1980	10.12.2009	17	By Promotion	
70.	Mr. Khushdil Khan	BA	20.11.1959 Nowshera	05.04.1984	10.12.2009	17	By Promotion	
71.	Mr. Bakhtiar Ahmed	B.A	04.04.1957 Abbottabad	13.04.1980	11.05.2010	17	By Promotion	
72.	Mr. Riaz Ahmed	B.A	10.04.1965 Swabi	05.04.1984	11.05.2010	17	By Promotion	
73.	Mr. Imtiaz Ali	B.A	05.06.1960 Nowshera	05.04.1984	11.05.2010	17	By Promotion	
74.	Mr. Shahid Ahmed	F.A	01.01.1961 Mardan	08.04.1984	20.01.2011	17	By Promotion	He has given revised Seniority in accordance with letter No. SOR-V-I/E&AD/1-14/2005, dated 09.05.2008 due to UN MISSION
75.	Mr. Nowsher Khan	M.A	14.05.1961 Peshawar	07.04.1984	11.05.2010	17	By Promotion	Assigned ante date seniority vide Notification No. S/5898-5942/12, dated 13.08.2012.
76.	Mr. Sajjad Ali	F.A	05.05.1958 Peshawar	05.04.1984	13.06.2011	17	By Promotion	He has been given revised Seniority.
77.	Mr. Tariq Sohail	B.A	15.04.1963 Bannu	05.04.1984	13.06.2011	17	By Promotion	He has been given revised Seniority.
78.	Mr. Jehanzeb Khan Burki	MA/LLB	15.07.1963 Peshawar	05.04.1984	20.01.2011	17	By Promotion	

	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
79.	Mr. Khan Akbar	F.A	01.06.1965 Peshawar	05.04.1984	20.01.2011	17	By Promotion	
80.	Mr. Shah Jehan	F.A	05.01.1969 Charsadda	05.04.1984	13.06.2011	17	By Promotion	He has been given revised Seniority vide letter No. S/3435/11, dated 13.06.2011.
81.	Mian Muhammad Riaz	M.A	10.02.1958 Charsadda	31.12.1980	20.01.2011	17	By Promotion	
82.	Mr. Muhammad Javed Khan	F.A	15.04.1960 Peshawar	10.11.1987	20.01.2011	17	By Promotion	
83.	Mr. Fazal Ahmed Jan	M.A/LLB	02.04.1962 Peshawar	10.11.1987	20.01.2011	17	By Promotion	
84.	Mr. Saleem Riaz	F.A	25.06.1965 Peshawar	18.11.1987	20.01.2011	17	By Promotion	
85.	Mr. Sarfaraz Ali Shah	B.A	29.08.1960 Peshawar	16.04.1991	20.01.2011	17	By Promotion	
86.	Mr. Waseem Ahmed Khalil	B.A	22.04.1962 Peshawar	16.04.1991	20.01.2011	17	By Promotion	
87.	Mr. Muhammad Ashfaq	B.A	01.04.1971 Charsadda	16.04.1991	20.01.2011	17	By Promotion	
88.	Mr. Muhammad Zahir Shah	F.A	09.03.1955 Peshawar	08.01.1975	20.01.2011	17	By Promotion	
89.	Mr. Lai Farid	F.A	15.11.1957 Karak	15.11.1975	20.01.2011	17	By Promotion	
90.	Mr. Mushtaq Hussain	F.A	19.09.1953 Kohat	22.04.1978	20.01.2011	17	By Promotion	
91.	Mr. Zain Khan	M.A/LLB	01.04.1960 Mardan	06.02.1990	20.01.2011	17	By Promotion	
92.	Mr. Shahzada Kokab Farooq	M.A	13.12.1969 DIKhan	20.04.1991	20.01.2011	17	By Promotion	
93.	Mr. Baz Mir	10 th	01.10.1957 Kohistan	07.05.1981	20.01.2011	17	By Promotion	
94.	Mr. Arif Javed	B.A	08.02.1964 Haripur	10.11.1987	20.01.2011	17	By Promotion	
95.	Mr. Akhtar Ali	B.A	04.02.1955 Nowshera	20.06.1977	20.01.2011	17	By Promotion	
96.	Mr. Aman Ullah	B.A	09.07.1964 Bannu	20.04.1991	20.01.2011	17	By Promotion	
97.	Mr. Ahmed Nawaz	F.A	09.09.1954 Haripur	19.04.1980	20.01.2011	17	By Promotion	
98.	Mr. Tariq Mehmood	B.A	28.04.1965 Abbottabad	25.04.1991	30.06.2011	17	By Promotion	He has been given revised Seniority
99.	Mr. Ijaz Ahmed	B.A	15.06.1966 Abbottabad	28.04.1991	20.01.2011	17	By Promotion	
100.	Mr. Janas Khan	B.A	10.02.1965 Haripur	25.09.1987	20.01.2011	17	By Promotion	
101.	Mr. Mukhtiar Ahmad	F.A	04.02.1969 Abbottabad	28.04.1991	30.06.2011	17	By Promotion	He has been given revised Seniority.
102.	Mr. Muhammad Sulernan	B.Sc	28.07.1970 Mansehra	28.04.1991	30.06.2011	17	By Promotion	He has been given revised Seniority
103.	Mr. Saeed Ahmed	F.A	06.04.1966 Haripur	26.04.1991	20.01.2011	17	By Promotion	
104.	Mr. Asif Gohar	10 th	07.08.1964 Mansehra	28.12.1985	20.01.2011	17	By Promotion	
105.	Mr. Hafeez Ur Rehman	F.A	01.07.1957 Abbottabad	26.09.1975	20.01.2011	17	By Promotion	
106.	Mr. Muhammad Shaukat	10 th	10.02.1956 Abbottabad	25.04.1974	13.06.2011	17	By Promotion	He has been given revised Seniority
107.	Mr. Khaista Rehman	F.A	30.03.1956 Dii Upper	20.08.1970	20.01.2011	17	By Promotion	
108.	Mr. Riaz ud Din	F.A	16.05.1955 Karak	22.04.1978	30.06.2011	17	By Promotion	


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	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 ST ENTRY INTO GOVT. SERVICE	DATE OF PROMOTION TO the Rank of DSP			Remarks
					DATE	PAY SCALE	METHOD OF RECRUITMENT	
109.	Mr. Shams ur Rahman	B.A	01.09.1954 Chitral	01.04.1978	30.06.2011	17	By Promotion	
110.	Mr. Fazal Haleem Jan	F.A	27.03.1954 Mkd: Agency	05.11.1973	30.06.2011	17	By Promotion	
111.	Mr. Muhammad Saleem	F.A	05.02.1954 Mkd: Agency	01.04.1980	30.06.2011	17	By Promotion	
112.	Mr. Aamir Shahzad	M.A	09.08.1968 Peshawar	16.04.1991	30.06.2011	17	By Promotion	
113.	Mr. Amir Muhammad	B.A	07.01.1970 Mkd:	25.04.1991	19.03.2012	17	By Promotion	Assigned revised seniority vide this office Notification No. S/5898-5942/12, dated 13.08.2012.
114.	Mr. Jehanzeb Khan	B.A/LLB	21.02.1959 Dir	30.03.1980	30.06.2011	17	By Promotion	
115.	Mr. Naveed Iqbal	F.A	14.03.1954 Swat	01.04.1980	30.06.2011	17	By Promotion	
116.	Mr. Muhammad Idrees	10 th	18.12.1957 Peshawar	04.12.1976	30.06.2011	17	By Promotion	
117.	Mr. Fazaal Kabbi	B. Sc	01.05.1954 Swat	01.04.1980	30.06.2011	17	By Promotion	
118.	Mr. Ali Muhammad Bogra	B.A	01.02.1956 Mkd: Agency	01.04.1980	30.06.2011	17	By Promotion	
119.	Mr. Nisar Ahmad	BA/LLB	25.03.1960 Mardan	27.04.1987	30.06.2011	17	By Promotion	
120.	Mr. Zar Wali	10 th	04.12.1957 Bannu	15.04.1976	30.06.2011	17	By Promotion	
121.	Mr. Hameedullah	9 th	01.05.1957 DIKhan	06.11.1975	19.03.2012	17	By Promotion	
122.	Mr. Bashaar Khan	B.A	05.05.1954 Bannu	24.11.1974	19.03.2012	17	By Promotion	
123.	Mr. Gul Naseeb	F.Sc	09.11.1968 Bannu	24.04.1991	19.03.2012	17	By Promotion	
124.	Mr. Waqar Ahmad	B.A	03.01.1968 Nowshera	02.10.1988	19.03.2012	17	By Promotion	
125.	Mr. Muhammad Shafiq	B.A	13.01.1963 Bannu	29.04.1991	19.03.2012	17	By Promotion	
126.	Mr. Hamidullah Khan	10 th	01.01.1957 Mardan	21.01.1969	19.03.2012	17	By Promotion	
127.	Mr. Muhammad Arif	MA	10.03.1969 Peshawar	16.04.1991	19.03.2012	17	By Promotion	
128.	Mr. Rafiullah	10 th	19.04.1960 Kohat	20.01.1980	19.03.2012	17	By Promotion	
129.	Mr. Tahir ur Rahman	B.A	28.02.1969 Haripur	18.04.1991	19.03.2012	17	By Promotion	
130.	Mr. Abdul Ghafoor	Matric	24.05.1957 DIKhan	14.10.1975	31.03.2012	17	By Promotion	Assigned ante date seniority vide Notification No S/5898-5942/12, dated 13.08.2012.
131.	Mr. Darvaish Ali	B.A/LLB	14.06.1962 Mardan	08.04.1984	19.03.2012	17	By Promotion	
132.	Mr. Tauheed Khan	B.A	20.10.1963 DIKhan	17.05.1983	19.03.2012	17	By Promotion	
133.	Mr. Salah-ud-Din	MA	15.01.1970 Tank	01.02.1995	16.10.2012	17	By Promotion	
134.	Mr. Gul Nawaz	MA	07.12.1959 Swabi	27.04.1991	31.03.2012	17	By Promotion	
135.	Mr. Noor Jamal	MA	10.01.1966 Mardan	27.04.1991	31.03.2012	17	By Promotion	
136.	Mr. Muhammad Arif	BA	22.04.1964 Bannu	25.04.1991	16.10.2012	17	By Promotion	
137.	Mr. Tariq Habib	MA	05.09.1968 Peshawar	21.12.1994	31.03.2012	17	By Promotion	
138.	Mr. Nisar Ahmad	B.A	02.11.1973 Charsadda	21.12.1994	31.03.2012	17	By Promotion	
139.	Mr. Aslam Nawaz	MA/LLB	01.03.1972 Bannu	11.01.1995	31.03.2012	17	By Promotion	

	NAME OF OFFICER	QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF ENTRY INTO GOVT. SERVICE	DATE	PAY SCALE	METHOD OF RECRUITMENT	
140.	Mr. Tariq Iqbal	M. Sc/LLB	13.04.1974 Peshawar	21.12.1994	31.03.2012	17	By Promotion	
141.	Mr. Sanaulah	BA	10.01.1969 Lakki	29.04.1991	31.03.2012	17	By Promotion	
142.	Mr. Bahruddin	BA	31.08.1954 Swat	30.11.1971	31.03.2012	17	By Promotion	
143.	Mr. Ali Rehman	BA/LLB	15.04.1955 Swat	01.04.1983	16.10.2012	17	By Promotion	
144.	Mr. Sher Hussain	FA	08.05.1956 Dir (L)	01.04.1983	16.10.2012	17	By Promotion	
145.	Mr. Mubarak Khan	FA	04.03.1957 Swat	01.04.1983	16.10.2012	17	By Promotion	
146.	Mr. Riaz Ahmad	RA	01.01.1960 Mkd. Agy:	01.04.1983	16.10.2012	17	By Promotion	
147.	Mr. Dakht Zada	BA	15.07.1962 Bunir	01.04.1983	16.10.2012	17	By Promotion	
148.	Mr. Quaid Kamal	BA	01.01.1963 Charsadda	14.05.1984	16.10.2012	17	By Promotion	
149.	Mr. Banaras Khan	BA	05.01.1962 Nowshera	12.01.1980	16.10.2012	17	By Promotion	
150.	Mr. Shafiullah	MA	01.04.1971 DIKhan	01.02.1995	16.10.2012	17	By Promotion	
151.	Mr. Abdul Waheed Khan	F.A	10.07.1967 Mansehra	23.02.1987	07.05.2013	17	By Promotion	
152.	Mr. Munir Hussain	BA	30.05.1966 Mansehra	28.04.1991	16.10.2012	17	By Promotion	Assigned revised seniority vide Notification No. 1535-50/E-II, dated 18.01.2013.
153.	Mr. Qamar Hayat	BA	18.04.1971 Haripur	13.12.1994	16.10.2012	17	By Promotion	
154.	Mr. Zulfiqar Khan Jadoon	10 th	15.06.1963 Abbottabad	13.03.1982	25.03.2013	17	By Promotion	
155.	Mr. Shaukat Zaman	10 th	04.05.1955 Haripur	04.09.1973	16.10.2012	17	By Promotion	
156.	Mr. Arshad Masood	10 th	26.04.1955 Abbottabad	04.09.1973	16.10.2012	17	By Promotion	
157.	Mr. Nazir Ahmad	MA/B. Ed	02.02.1970 Abbottabad	29.07.1998	16.10.2012	17	By Promotion	
158.	Mr. Saeed Akhtar	M. Sc	02.02.1971 Haripur	29.07.1998	16.10.2012	17	By Promotion	
159.	Mr. Muhammad Ayaz	B. Sc	03.03.1975 Abbottabad	29.07.1998	16.10.2012	17	By Promotion	
160.	Mr. Muhammad Jamil Akhtar	F. Sc	22.02.1977 Haripur	29.07.1998	16.10.2012	17	By Promotion	
161.	Mr. Muhammad Azeem	8 th	06.01.1958 Abbottabad	04.11.1970	16.10.2012	17	By Promotion	
162.	Mr. Khurshid Ahmad	B.A	05.07.1958 Mansehra	10.09.1998	25.03.2013	17	By Promotion	
163.	Mr. Abdul Aziz	FA	04.06.1957 Haripur	21.10.1975	16.10.2012	17	By Promotion	
164.	Mr. Faiak Niaz	MA	01.04.1965 Swabi	27.04.1991	16.10.2012	17	By Promotion	
165.	Mr. Ishtiaq Ahmad	BA	01.11.1971 Lakki	09.01.1995	16.10.2012	17	By Promotion	
166.	Mr. Hidayatullah	10 th	14.05.1961 DIKhan	08.08.1970	16.10.2012	17	By Promotion	
167.	Mr. Arbab Khan	10 th	03.12.1956 Lakki	24.11.1976	16.10.2012	17	By Promotion	
168.	Mr. Riaz-ul-Islam	10 th	03.04.1961 Bannu	08.09.1979	16.10.2012	17	By Promotion	
169.	Mr. Shaukat Ali	B. Sc	05.03.1971 Swabi	23.01.1995	16.10.2012	17	By Promotion	
170.	Mr. Abdul Samad	M.A	14.04.1969 Swabi	27.11.1994	25.03.2013	17	By Promotion	
171.	Mr. Mushtaq Ahmad	M.A	15.03.1970 Swabi	27.11.1994	25.03.2013	17	By Promotion	
172.	Mr. Sajjad Ahmad	M.A	01.04.1968 Swabi	27.11.1994	25.03.2013	17	By Promotion	

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				GOVT. SERVICE		SCALE	RECRUITMENT
173	Mr. Iqbal Iqbal	M.A (Pol: Sc)	20.01.1969 Abbottabad	27.11.1994	25.03.2013	17	By Promotion
174	Mr. Muhammad Javed	10 th	15.03.1956 Abbottabad	19.06.1991	25.03.2013	17	By Promotion
175	Mr. Muhammad Saleem	8 th	01.01.1958 Abbottabad	21.08.1995	25.03.2013	17	By Promotion
176	Mr. Muhammad Saddique	10 th	20.02.1957 Manshra	30.09.1975	25.03.2013	17	By Promotion
177	Mr. Aurangzeb	10 th	05.02.1954 Manshra	01.01.1972	25.03.2013	17	By Promotion
178	Mr. Abdur Rashid Marwat	10 th	30.03.1963 Lakki	15.07.1982	25.03.2013	17	By Promotion
179	Mr. Muzamil Shah	M.A	08.03.1972 Swabi	27.11.1994	25.03.2013	17	By Promotion
180	Mr. Niaz Muhammad	M.A/LL.B	11.07.1971 Swabi	27.11.1994	25.03.2013	17	By Promotion
181	Mr. Shah Hassan	M.A	01.05.1968 Madan	27.11.1994	08.04.2013	17	By Promotion
182	Mr. Sahibzade Sajjad Ahmad	B.A	07.07.1971 Swabi	27.11.1994	08.04.2013	17	By Promotion


(IHSAN GHANI)
 Provincial Police Officer,
 Khyber Pakhtunkhwa,
 Peshawar.