

M. Arabi

25.05.2022

Mr. Fazal Shah, Mohmand, Advocate for the appellant present.

Learned counsel for the appellant produced Notification dated 21.01.2022 whereby the appellant has been promoted to the post of Director General (BS-19) copy of which is placed on file. It was contended that plea in the present appeal had been for promotion of the appellant as Director General (BS19) with effect from 03.08.2021 with all back benefits whereas he has been promoted with immediate effect vide Notification dated 21.01.2022. As such the instant service appeal becomes infructuous. He therefore requested to allow withdrawal of the instant service appeal to be submitted afresh with new cause of action for seeking promotion w.e.f. 03.08.2021. The request is acceded to and the service appeal in hand stands dismissed as withdrawn. Consign.

03. Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal this 25<sup>th</sup> day of May, 2022.



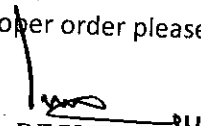
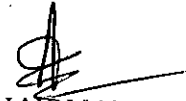

(Mian Muhammad)  
Member (E)

Form- A

# FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 22/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/01/2022	<p>The appeal of Mr. Muhammad Arabi resubmitted today by Mr. Fazal Shah Advocate <del>Advocate</del>, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>25/02/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	25.02.2022	<p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.</p> <p style="text-align: right;"> Reader.</p>



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

Dated Peshawar, the January 21, 2022

**NOTIFICATION**

**NO.SO(E-I)E&AD/9-114/2021.** The Competent Authority, on the recommendations of Provincial Selection Board in its meeting held on 30.07.2021, is pleased to promote Mr Muhammad Arabi, Deputy Director (BS-18) to the post of Director General (BS-19), Tourist Services, Khyber Pakhtunkhwa, on regular basis, with immediate effect.

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

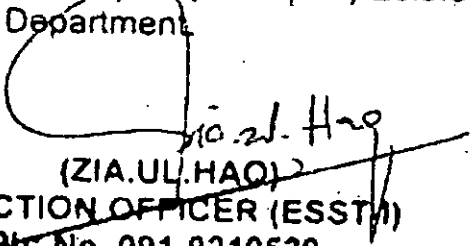
3. Posting/transfer Notification of the above-named officer will be issued, later on.

**CHIEF SECRETARY,  
GOVERNMENT OF KHYBER PAKHTUNKHWA**

**Endst. of even No. & date**

Copy forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Govt. of Khyber Pakhtunkhwa: Sports Department.
4. Accountant General, Khyber Pakhtunkhwa.
5. Director General, Tourist Services, Khyber Pakhtunkhwa.
6. Director General, Information & P.Rs, Khyber Pakhtunkhwa.
7. PSO to Chief Secretary, Khyber Pakhtunkhwa.
8. PS to Chief Secretary, Khyber Pakhtunkhwa.
9. PS to Secretary (Estt)/Special Secretary (Estt)/ Special Secretary (R)/PA to AS(Estt)/AS (HRD)/ SO(Secret)/ SO(HRD-I) & SO(E-II) Establishment Department.
10. PS to Secretary (Admn)/AS(Admn)/D.S (Admn)/SO(Transport)/Estate Officer/DD(IT) and ACSO Cypher Administration Department.
11. Officers concerned

  
(ZIA.UL.HAQ)  
SECTION OFFICER (ESST-I)  
Ph. No. 091-9210529

**IMDAD KHAN**

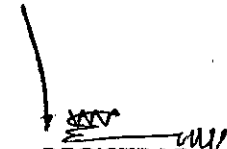
21-1-2022

The Execution petition of Mr. Muhammad Arabi received today i.e. on 04.01.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Checklist is not attached with the appeal.
2. Memorandum of the appeal may be got signed by the learned counsel.
3. Appeal has not been flagged/marked with annexure marks.
4. Annexures of the appeal may be attested.
5. Affidavit be got attested by the Oath Commissioner.
6. Copy of approval letter dated 08/12/2021 mentioned in para-07 of memo of the appeal annexed as annexure G is not attached with the appeal.

No. 33 /S.T,

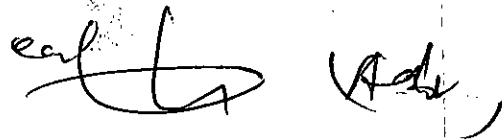
Dt. 06/01/2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA,  
PESHAWAR.

Mr. Fazal Shah Mohmand Adv. Pesh.

Sir,

Re submitted after necessary completion  
For the copy of the approval dated 8/12/2021  
attached with appeal at Page No. 14.

  
Adv.

# HYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

## CHECK LIST

M. Arabi  
..... Appellant

**Versus**

Govt & others  
..... Respondents

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

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

Name:- Fazal Shah Mohammad ASC

Signature:- [Signature]

Dated:- 05/11/22

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No 22 /2022

Muhammad Arabi.....Appellant

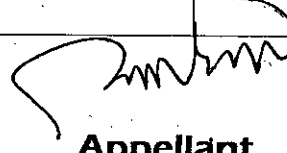
**V E R S U S**

Govt. and others.....Respondents

**I N D E X**

S.No	Description of Documents	Annexure	Pages
1.	Service Appeal with affidavit		1-4
2.	Copy of Letter dated 28-07-2021 & Copy of Agenda	A & B	5-7
3.	Copy of Minutes & Letter dated 04-08-2021	C & D	8-11
4.	Copy of Notification dated 13-10-2021	E	12
5.	Copy of Summary, Approval dated 08-12-2021 & Letter dated 13-12-2021	F, G & H	13-16
6.	Copy of departmental appeal dated 06-09-2021	I	17
7.	Copy of rules	J	18-24
12.	Vakalat Nama		25

**Dated:05-01-2022**



**Appellant**

**Through**



**Fazal Shah Mohmand**

**Advocate,**

**Supreme Court of Pakistan**

**OFFICE:-** Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841

**Email:-** fazalshahmohmand@gmail.com

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR** Khyber Pakhtunkhwa Service Tribunal

Service Appeal No 22 /2022

Diary No. 13  
Dated 05/01/2022

Muhammad Arabi, Deputy Director, Directorate of Tourist Services,  
Khyber Pakhtunkhwa, Peshawar. ....Appellant

**V E R S U S**

1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary, Sports, Tourism, Archeology, Youth Affairs & Museums Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
3. Secretary Establishment Department Govt. of Khyber Pakhtunkhwa, Peshawar.

.....Respondents

**APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR NOTIFYING THE PROMOTION OF THE APPELLANT AS DIRECTOR GENERAL TOURIST SERVICES, GOVT. OF KHYBER PAKHTUNKHWA, PESHAWAR FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF STATUTORY PERIOD.**

**PRAYER:-**

On acceptance of this appeal, the respondents may kindly be directed to issue the Notification of the promotion of the appellant as Director General, Tourist Services, Khyber Pakhtunkhwa, (BPS-19) w.e.f 03-08-2021, with all back benefits.

**Respectfully Submitted:-**

1. That the appellant was appointed as Assistant Controller (BPS-17), upon the recommendations of Federal Public Service Commission on 15-07-2008 and since appointment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That after eighteenth amendment, the Federal Ministry of Tourism was devolved into provinces, and consequently the services of the appellant were placed at the disposal of Khyber Pakhtunkhwa Government. The appellant was promoted as Deputy Director (BPS-18) in the Directorate of Tourist Services Khyber Pakhtunkhwa on 22-05-2018.

Filed today  
Registrar  
5/1/2022

Re-submitted to-day and filed.

2/1/22

3. That in the year 2021 the appellant as per rules governing the subject was due for promotion as Director General (BPS-19), Tourist Services Khyber Pakhtunkhwa and in July 2021, the meeting of the Provincial Selection Board was scheduled for 31-07-2021 and according to the Agenda Item No 6 the case of the appellant was placed before the same for promotion as Director General (BPS-19), Tourist Services Khyber Pakhtunkhwa, as per Letter dated 28-07-2021. **(Copy of Letter dated 28-07-2021 & Copy of Agenda is enclosed as Annexure A & B).**
4. That accordingly the said meeting was held wherein the appellant was recommended for promotion as Director General (BPS-19), Tourist Services Khyber Pakhtunkhwa as evident from its minutes and which recommendations were approved by the competent authority, i.e the honorable Chief Minister Khyber Pakhtunkhwa on 03-08-2021 which was communicated to the parent department vide letter dated 04-08-2021. **(Copy of Minutes & Letter dated 04-08-2021 is enclosed as Annexure C & D).**
5. That illegally and in violation of law and rules, in the note prepared for the approval of competent authority it was malafidely mentioned that the Board directed that the Finance Department shall create a post of Additional Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, however the promotion of the appellant was not notified whereas those considered in the same PSB were notified.
6. That the post of Additional Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, was finally created which was notified vide Notification dated 13-10-2021. **(Copy of Notification dated 13-10-2021 is enclosed as Annexure E).**
7. That after the creation of stated post respondents moved another summary before the honorable Chief Minister for the posting of the appellant against the post of Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, as per the recommendations of PSB for one day for actualization malafidely and his subsequent posting as Additional Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, which was approved by the competent authority on 08-12-2021 which was forwarded by respondent No 2 to respondent No 4 vide Letter dated 13-12-2021. **(Copy of Summary, Approval dated 08-12-2021 & Letter dated 13-12-2021 is enclosed as Annexure F, G & H).**
8. That the appellant filed departmental appeal before respondent No 2 on 06-09-2021 which has not been responded so far despite the lapse of more than the statutory period of ninety



-3-

days. **(Copy of departmental appeal dated 06-09-2021 is enclosed as Annexure I).**

9. That this action of respondents of not issuing notification of promotion of the appellant as Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, is against the law, facts and principles of justice on grounds inter-alia as follows:-

**G R O U N D S :-**

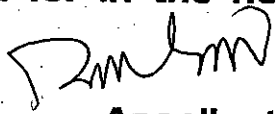
- A. That the omissions and commissions of respondents are illegal and void ab-initio.
- B. That mandatory provisions of law and rules have badly been violated by the respondents and the appellant has not been treated according to law and rules in violation of Article 4 and 25 of the Constitution.
- C. That not issuing the notification of the appellant as Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, is not in consonance with law and principles of natural justice and is based on malafide.
- D. That the respondents are bent upon to favor one Ghulam Saeed who is posted as Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, since June 2019 and who as per law is not entitled to be posted as such.
- E. That the law and rules on the subject are very much clear which provide for the filling of the post of Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, by promotion only and the same can only be filled by transfer in case no suitable person is available while in the instant case, the appellant has been recommended for promotion, hence the inaction of respondents is not known to law on the subject. **(Copy of rules is enclosed as Annexure J).**
- F. That the malafide of the respondents is further proved from the fact that directions for creation of the post of Additional Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, were issued by the PSB which directions is void being not its mandate.
- G. That strangely the issue of posting the appellant against the post of Additional Director General, Directorate of Tourist Service, Khyber Pakhtunkhwa, was proposed by the time when the said post was even not created rather the same was created in October 2021, i.e much after the appellant was recommended and even approval was

granted by the competent authority which speaks of anything but not fair and bonafide.

- H. That even otherwise the said Ghulam Saeed has served his normal tenure under the law/policy but even then he is favored at the cost of the appellant.
- I. That there is no omission or commission on part of the appellant and he being fit and even recommended by the competent forum is kept deprived of his due rights.
- J. That the appellant did nothing that amounts to misconduct.
- K. That the appellant has more than 13 years of service with unblemished service record with no previous complaint of the sort against him.
- L. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Dated:-05-01-2022

  
Appellant

Through

  
Fazal Shah Mohmand  
Advocate,  
Supreme Court of Pakistan

**LIST OF BOOKS**

- 1. Constitution 1973.
- 2. other books as per need

**CERTIFICATE:**

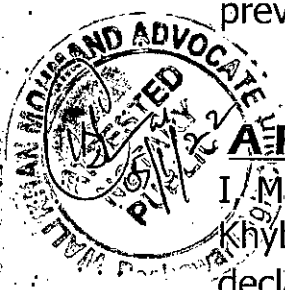
Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

  
ADVOCATE

**AFFIDAVIT**

I, Muhammad Arabi, Deputy Director, Directorate of Tourist Services, Khyber Pakhtunkhwa, Pehsawar, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

  
DEPONENT





**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

No. SO(PSEB)ED/ 1-1/2021/(9)  
Dated Peshawar, the 28.07.2021

"A"  
-5-

To

1. The Additional Chief Secretary,  
Government of Khyber Pakhtunkhwa,  
Planning & Development Department.
2. The Senior Member, Board of Revenue,  
Khyber Pakhtunkhwa.

**SUBJECT: - MEETING OF THE PROVINCIAL SELECTION BOARD.**

Dear Sir,

I am directed to refer to the subject and to say that meeting of Provincial Selection Board will be held on 30.07.2021 at 01:30 PM and 31.07.2021 at 10:30 AM under the chairmanship of Chief Secretary, Khyber Pakhtunkhwa in the Conference Room of Chief Secretary, Khyber Pakhtunkhwa. Agenda of the meeting alongwith working papers are enclosed.

2. You are requested to kindly make it convenient to attend the meeting as per agenda of the meeting attached.

Yours faithfully,

*[Signature]* 28-7-2021  
SECTION OFFICER (PSB)

**Encl. As above**

**Endst. of even No. & date.**

A copy is forwarded to: -

1. The P.S to Chief Secretary, Khyber Pakhtunkhwa.
2. The P.S to Secretary Establishment Department.
3. The P.S to Special Secretary (Establishment), Establishment department.
4. The P.S to Special Secretary (Reg.) Establishment Department.
5. The P.Ss to Additional Secretaries (Reg.-I&II) Establishment Department.

*[Signature]*  
SECTION OFFICER (PSB)

P.T.O

**ATTESTED**

**Endst. of even No. & date.**

A copy is forwarded to: -

1. The Chairman, Provincial Inspection Team, Khyber Pakhtunkhwa,
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Planning & Development Department.
4. The Secretary to Govt. of Khyber Pakhtunkhwa, Minerals Development Department.
5. The Secretary to Govt. of Khyber Pakhtunkhwa, Zakat & Usher Department.
6. The Secretary to Govt. of Khyber Pakhtunkhwa, Sports, Culture & Tourism Department.
7. The Secretary to Govt. of Khyber Pakhtunkhwa, Industries, Commerce & Technical Education Department.
8. The Secretary to Govt. of Khyber Pakhtunkhwa, Excise & Taxation Department.
9. The Secretary to Govt. of Khyber Pakhtunkhwa, Labour Department.
10. The Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department.
11. The Secretary to Govt. of Khyber Pakhtunkhwa, Higher Education Department.
12. The Secretary to Govt. of Khyber Pakhtunkhwa, Population Welfare Department.
13. The Secretary to Govt. of Khyber Pakhtunkhwa, Public Health Engineering Department.
14. The Secretary to Govt. of Khyber Pakhtunkhwa, Irrigation Department.
15. The Secretary to Govt. of Khyber Pakhtunkhwa, C&W Department.
16. The Secretary to Govt. of Khyber Pakhtunkhwa, Home & TAs Department.
17. The Secretary to Govt. of Khyber Pakhtunkhwa, Environment, Forestry & Wildlife Department.
18. The Secretary to Govt. of Khyber Pakhtunkhwa, Agriculture, Livestock, Dairy Development & Cooperative Department.
19. The Secretary to Govt. of Khyber Pakhtunkhwa, Health Department.
20. The Secretary to Govt. of Khyber Pakhtunkhwa, Law & Parliamentary Affairs department **with the request to attend the meeting alongwith Advocate General, Khyber Pakhtunkhwa for legal opinion in litigation cases.**

**They are requested to kindly attend meeting of the PSB to be held on 30.07.2021 at 01:30 PM and 31.07.2021 at 10:30 AM in the Conference Room of Chief Secretary, Khyber Pakhtunkhwa. They are further requested to bring synopsis of PERs, original PER files and other service record of the officers concerned for perusal of the Board.**

SECTION OFFICER (PSB)

**Endst of even No. & date.**

A copy is forwarded to: -

1. The Section Officer (E-I) / (E-II) / (Secret), Establishment Department.
2. PAs to Deputy Secretaries (Reg.-I, II & III), Establishment Department.

SECTION OFFICER (PSB)

**ATTESTED**

**AGENDA OF THE PSB MEETING  
TO BE HELD ON 30.07.2021 AT 01:30 PM**

ITEM#	DESCRIPTION OF CASE	PANEL	POSTS	DEPARTMENT
1.	Promotion of Senior Engineer BS-18 to the post of Member (Technical) BS-19 in Provincial Inspection Team, Khyber Pakhtunkhwa.	1	1	PIT
2.	Promotion of Assistant Treasury Officer BS-17 to the post of District Accounts Officer / Treasury Officer BS-18	24	12	Finance
3.	Promotion of PPS BS-19 officers to the post of PPS BS-20	3	4	P&D
4.	Promotion of Deputy Chief Inspector of Mines BS-19 to the post of Chief Inspector of Mines BS-20	2	1	Minerals Development
5.	Promotion of Assistant Administrator / District Zakat Officer BS-17 to the post of Deputy Administrator / Senior District Zakat Officer BS-18	8	5	Zakat
6.	Promotion of Deputy Director BS-18 to the post of Director General BS-19 in Directorate of Tourist Services, Khyber Pakhtunkhwa	1	1	Sports
7.	Promotion of Director BS-19 on regular basis in the Directorate of Culture, Khyber Pakhtunkhwa	2	1	Sports
8.	Promotion of Deputy Director / Regional Sports Officer BS-18 to the post of Director BS-19	4	2	Sports
9.	Promotion of Associate Professor BS-19 (Basic Sciences and Humanity Group) to the post of Professor BS-20 (Basic Sciences and Humanity Group)	12	4	Industries
10.	Promotion of Associate Professor BS-19 (Technical Subjects) to the post of Professor BS-20 (Technical Subjects) at Govt. College of Technology / Govt. Polytechnic Institutes	16	6	Industries
11.	Promotion of Principal BS-18 (GTVC Women) to the post of Principal BS-19 GTVC Women	1	4	Industries
12.	Promotion of Accounts Officer BS-17 to the post of Deputy Director Administration BS-18 in the Directorate of Industries & Commerce.	1	1	Industries
13.	Promotion of Assistant Excise & Taxation Officer BS-17 to the post of Excise & Taxation Officer BS-18	28	16	Excise
14.	Promotion of Statistical Officer BS-17 to the post of Deputy Director Labour Planning BS-18	1	1	Labour
15.	Promotion of Assistant Director BS-17 to the post of Deputy Director BS-18	4	2	Labour
16.	Promotion of Deputy District Attorney BS-18 to the post of District Attorney BS-19	32	16	Law
17.	Promotion of Administrative Officer BS-17 to the post of Senior Administrative Officer BS-18	1	1	Law
18.	Promotion of Librarian BS-17 as Reference and Research Officer BS-18	1	1	Law
19.	Promotion of Chief Librarian BS-18 to the post of Director BS-19	1	1	HED
20.	Promotion of Librarian BS-18 to the post of Librarian (Senior Scale BS-18) on regular basis of College Cadre Higher Education Department	1	1	HED
21.	Promotion of Research Officer BS-17 to the post of Deputy Director BS-18	2	1	HED
22.	Promotion of Additional Director General BS-20 to the post of Director General BS-20	1	1	Population
23.	Promotion of Assistant Director / DDPWO (Non-Tech) / TPWO/ Dy. Demographer / Instructor (Non-Tech) / Accounts Officer BS-17 to the post of Deputy Director (Non-Tech) / DPWO (Non-Tech) / Demographer / Senior Instructor BS-(Non-Tech) BS-18	6	3	Population
24.	Promotion of Executive Engineer BS-18 to the post of Superintending Engineer BS-19	11	8	PHE
25.	Promotion of Executive Engineer BS-18 to the post of Superintending Engineer BS-19	14	7	Irrigation

**ATTESTED**

"B"  
-7-

"C"

-8-

ITEM NO. (06)

**SPORTS, CULTURE, TOURISM, ARCHAEOLOGY, MUSEUMS & YOUTH AFFAIRS**  
**SECRETARY (PSB) KHYBER PAKHTUNKHWA**  
 (Meeting of PSB held on 30.07.2021)

**SUBJECT:- PROMOTION OF DEPUTY DIRECTOR BS-18 TO THE POST OF DIRECTOR GENERAL BS-19 IN DIRECTORATE OF TOURIST SERVICES, KHYBER PAKHTUNKHWA.**

Secretary Sports, Culture, Tourism, Archaeology, Museums & Youth Affairs apprised the Board that due to new creation, the post of Director General BS-19 is lying vacant in the Directorate of Tourist Service, Khyber Pakhtunkhwa.

2. According to the service rules, the post is required to be filled as under:-

*"By promotion, on the basis of seniority-cum-fitness from amongst the Deputy Directors having twelve years service in BPS-17 and above; and Provided that if no suitable person is available for promotion then by transfer from amongst PMS or PAS officers".*

3. The service record of the officer included in the panel was discussed as follows: -

S#	NAME OF OFFICER	RECOMMENDATIONS OF THE BOARD
1.	Muhammad Arabi.	His date of birth is 05.03.1978. He joined government service on 15.07.2008 in BS-17. He was promoted to BS-18 on 22.05.2018. He has completed prescribed length of service for promotion. No enquiry is pending against him. His PER dossier is complete. His service record upto 2020 is generally good. His quantified score is 62 and the Board awarded him 15 out of 30 marks. Secretary Sports has not yet provided a certificate as required under Section 8 (iii) of Khyber Pakhtunkhwa Tourism Act 2019. The Board directed that the Finance Department shall create a post of Additional Director General in Directorate of Tourist Services, Khyber Pakhtunkhwa
	<i>[Signature]</i> Secretary (PSB) Khyber Pakhtunkhwa Government Department	The Board recommended the officer for promotion to the post of Director General BS-19 on regular basis. He will be on probation for a period of one year.

**ATTACHED**



**SUMMARY FOR CHIEF MINISTER KHYBER PAKHTUNKHWA**

Subject: - **APPROVAL OF RECOMMENDATIONS OF PROVINCIAL SELECTION BOARD ON PROMOTIONS.**

The Provincial Selection Board in its meetings held on 30.07.2021 at 01:30 PM and 31.07.2021 at 10:30 AM considered promotion cases of civil servants to BS-17 and above. The PSB considered cases of employees of the following Departments for promotion:-

- i. Provincial Inspection Team, Khyber Pakhtunkhwa
- ii. Finance Department
- iii. Planning & Development Department
- iv. Minerals Development Department
- v. Zakat, Ushr & Social Welfare Department
- vi. Sports, Culture & Tourism Department
- vii. Industries, Commerce & Technical Education Department
- viii. Labour Department
- ix. Excise Department
- x. Elementary & Secondary Education Department
- xi. Higher Education Department
- xii. Population Welfare Department
- xiii. Public Health Engineering Department
- xiv. Irrigation Department
- xv. Establishment Department
- xvi. Communication & Works Department
- xvii. Home & Tribal Affairs Department
- xviii. Environment, Forestry & Wildlife Department
- xix. Agriculture, Livestock, Dairy Development & Cooperative Department
- xx. Health Department
- xxi. Law, Parliamentary Affairs & Human Rights Department
- xxii. Revenue & Estate Department


**ATTESTED**

xxiii. Science & Technology and Information Technology Department

xxiv. Local Govt. Elections & Rural Development Department

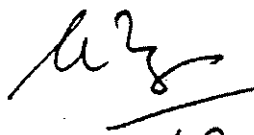
2 Approved minutes of PSB meetings held on 30.07.2021 and 31.07.2021 are added as Flag "A" & "B".

3 The Chief Minister, Khyber Pakhtunkhwa being competent authority, may kindly approve recommendations of the PSB as detailed in its minutes placed below at Flag "A" & "B".


  
(MUTAHER ZEB)  
Secretary, Establishment  
17/7/2021  
?

CHIEF SECRETARY,  
KHYBER PAKHTUNKHWA

Chief Minister

  
2/8  
Chief Secretary  
Govt. of Khyber Pakhtunkhwa

ay- kava - 3/5 approved

  
03-08-2021  
Chief Minister  
Khyber Pakhtunkhwa



ATTESTED



**IMMEDIATE  
CONFIDENTIAL**



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT**

NO. SO(PSB)ED/1-5/2021/P-71  
Dated Peshawar the 04.08.2021.

2-8-10906-91  
-11-  
"D"

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Sports, Culture & Tourism Department.

**SUBJECT: - MINUTES OF THE MEETING OF PROVINCIAL SELECTION  
BOARD HELD ON 30.07.2021.**

**PROMOTION OF DEPUTY DIRECTOR BS-18 TO THE POST OF  
DIRECTOR GENERAL BS-19 IN DIRECTORATE OF TOURIST  
SERVICES, KHYBER PAKHTUNKHWA.**

Dear Sir,

I am directed to refer to Sports, Culture & Tourism Department letter No. SO(DTS)6-13/2013/6759-60, dated 19.04.2021 on the subject and to forward herewith an extract of Agenda Item No (06) of the minutes/recommendations of the meeting of Provincial Selection Board held on 30.07.2021 as well as copy of approved summary wherein the Chief Minister, Khyber Pakhtunkhwa being competent authority in terms of Rule 4 (1) (a) of the Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 has approved the recommendations of the PSB, for further necessary action.

Yours faithfully,

*4.8.2021*  
SECTION OFFICER (PSB)

Encl: As Above.

3-1  
7  
3  
1  
8

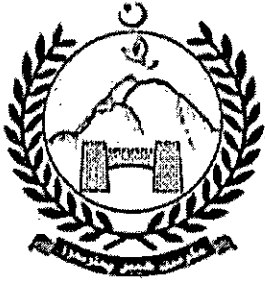
*P. up draft  
order.  
SoP  
G. Khan*

*W.S. 8.21  
J.S.*

**ATTESTED**

"E"

-12-



GOVERNMENT OF  
KHYBER PAKHTUNKHWA,  
SPORTS, TOURISM, ARCHAEOLOGY, YOUTH AFFAIRS & MUSEUMS  
DEPARTMENT.  
13-A, KHYBER ROAD, PESHAWAR CANTT:

Dated Peshawar the 13<sup>th</sup> October, 2021

**NOTIFICATION**

No.SO(T)5-81/2021/PAITHOM In pursuance of Government of Khyber Pakhtunkhwa, Finance Department letter No. BO-III/FD/514/SNEs/2021-22 dated 5-10-2021, sanction of the Government of Khyber Pakhtunkhwa Sports, Tourism, Archaeology, Youth Affairs & Museums Department is hereby accorded for the creation of one post Additional Director General (BPS-19) in the Directorate of Tourist Services Khyber Pakhtunkhwa Peshawar with immediate effect under DDO Code PR 4947- Directorate of Tourist Services, Khyber Pakhtunkhwa (Position Code 81140063) as approved by the SNE Committee in its meeting held on 15-09-2021.

2. The expenditure involved is debatable to the Function-Cum-Object Classification "04-Economic Affairs 047-Other Industries 0472-Subsidies 047202-Tourism", DDO Code PR 4947- Directorate of Tourist Services, Khyber Pakhtunkhwa within the sanctioned Budget Grant during financial year 2021-22.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
SPORTS, TOURISM, CULTURE, YOUTH AFFAIRS,  
ARCHAEOLOGY & MUSEUMS DEPARTMENT

Endst: No.B.O.I/FD/5-17/2021-22/SNE

Dated 25-10-2021

Copy to :

1. Accountant General Khyber Pakhtunkhwa, Peshawar.

Budget Officer (III)  
Finance Department

Copy to:-

1. Director General Directorate of Tourist Services, Khyber Pakhtunkhwa.
2. Director FMIU, Finance Department KP, Peshawar.
3. District Accounts Officer Peshawar.
4. Budget Officer-III, Finance Department KP, Peshawar.
5. PS to Secretary Sports, Tourism, Culture, Youth Affairs and Archaeology Department Khyber Pakhtunkhwa, Peshawar.

13/10/21.

Section Officer (Tourism)

**ATTESTED**



"F"  
-13-

SUMMARY FOR CHIEF MINISTER, KHYBER PAKHTUNKHWA

Subject POSTING OF MUHAMMAD ARABI, DEPUTY DIRECTOR (BS-18) AGAINST THE POST OF DIRECTOR GENERAL, DIRECTORATE OF TOURIST SERVICES, KHYBER PAKHTUNKHWA AS PER RECOMMENDATION OF PSB

The Provincial Selection Board (PSB) in its meeting held on 30.07.2021 recommended to promote Muhammad Arabi, Deputy Director, BS-18 to the post of Director General, BS-19 and the same was communicated by Section Officer (PSB) on 04.08.2021. The Board also recommended that the Finance Department shall create a post of Additional Director General (ADG) in Directorate of Tourist Services, Khyber Pakhtunkhwa (Annex-I). Subsequently, the Finance Department created a post of ADG, BS-19 in Directorate of Tourist Services, Khyber Pakhtunkhwa and communicated audit copy of the same to this Department (Annex-II).

2- It is pertinent to mention here that the service rules of Directorate of Tourist Services Khyber Pakhtunkhwa notified on 31.10.2017 enunciates at S. No. (1) the method of promotion of Deputy Director, BS-18 to the post of Director General, BS-19 as under:

*"By promotion on the basis of seniority-cum-fitness from amongst the Deputy Directors having twelve years' service in BS-17 and above; provided that if no suitable candidate is available for promotion then by transfer from amongst PMS or PAS officers" (Annex-III).*

3- The post of ADG was created due to the reasons that (1) the Department was of the considered opinion to not relieve – in case of appointment of the promoted officer to the post of Director, DTS, BS-19 – incumbent Director, DTS, Mr. Ghulam Saeed, PMS, BS-19, is performing exceptionally well (2) the Section 8 of the Khyber Pakhtunkhwa Tourism Act, 2019 has also placed an indirect bar on such a matter (Annex-IV) and (3) amendments in the said Act were under process to the Provincial Cabinet (which have now been discussed and approved by the Provincial Cabinet)

4- It is, now, appropriate time that the officer's promotion as well as posting orders are issued keeping in view the provision of Promotion Policy of the Provincial Government that "if a civil servant is recommended for promotion and the recommendations are not approved by the competent authority within a period of six months from such recommendations, they would lapsed (Annex-V).

5- In the view of above, it is proposed that the Establishment Department may notify promotion of Muhammad Arabi, Deputy Director, BS-18, to the post of Director General, BS-19, Directorate of Tourist Services, Khyber Pakhtunkhwa with immediate effect as per recommendations of PSB for one day actualization ONLY, and subsequently post the officer against the newly created post of Additional Director General, DTS, BS-19, while Mr. Ghulam Saeed, PMS, BS-19, Director DTS will continue to work on the same post afterwards.

**ATTESTED**

"G" -14-

7- Summary for Chief Minister, Khyber Pakhtunkhwa moved by Sports, Culture, Tourism, Archaeology, Museums & Youth Affairs Department regarding posting of Muhammad Arabi, Deputy Director (BS-18) against the post of Director General, Directorate of Tourist Services, Khyber Pakhtunkhwa as per recommendation of Provincial Selection Board has been examined and found in order.

8- Proposal of the Administrative Department at Para 5 of the Summary may be submitted for approval of the Chief Minister, Khyber Pakhtunkhwa being competent authority under Rule 4(1)(a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 (Annex-VI).

*Zakir Hussain Afridi*  
(Zakir Hussain Afridi)  
Secretary Establishment

30 November, 2021

Chief Secretary Khyber Pakhtunkhwa

HCM  
*[Signature]*

B. Para - 2/s, approved.

*[Signature]*  
08-12-2021

Chief Minister  
Khyber Pakhtunkhwa

CS

ATTESTED

**BETTER COPY OF THE PAGE NO. 14**

7. Summary for Chief Minister, Khyber Pakhtunkhwa moved by Sports Culture, Tourism Archaeology Museums & Youth Affairs Department regarding posting of Muhammad Arabi, Deputy Director (BS-18) against the post of Director General, Directorate of Tourist Services Khyber Pakhtunkhwa as per recommendation of Provincial Selection Board has been examined and found in order.

8. Proposal of the Administrative Department at Para 5 of the Summary may be submitted for approval of the Chief Minister, Khyber Pakhtunkhwa being competent authority under Rule 4(1)(a) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 (Annex-VI)

(Zakir Hussain Afridi)  
Secretary Establishment  
30<sup>th</sup> November, 2021

**Chief Secretary Khyber Pakhtunkhwa**

HCM  
Para-8/5, approved.

Chief Minister  
Khyber Pakhtunkhwa.

**ATTESTED**

Proposal contained in para-5 ante is submitted for perusal and approval of Chief Minister, Khyber Pakhtunkhwa is requested to approve proposal at Para 6/ante, please.

*Muhammad Majeed*  
(MUHAMMAD AHID MAJEED)  
SECRETARY TOURISM  
SECRETARY  
Tourism, Sports, Youth, Affairs,  
Archaeology & Museums, Department  
Govt. of Khyber Pakhtunkhwa

SECRETARY ESTABLISHMENT

CHIEF SECRETARY,  
KHYBER PAKHTUNKHWA

CHIEF MINISTER,  
KHYBER PAKHTUNKHWA

ATT/STED

9/10

**BETTER COPY OF THE PAGE NO. 15**

Proposal contained in Para-5 ante is submitted for perusal and approval of Chief Minister, Khyber Pakhtunkhwa is requested to approve proposal at Para 6/ante. Please.

(Muhammad Abid Majeed)  
Secretary Tourism

**SECRETARY ESTABLISHMENT**

**CHIEF SECRETARY**  
**KHYBER PAKHTUNKHWA**

**CHIEF MINISTER,**  
**KHYBER PAKHTUNKHWA**

**ATTESTED**



GOVERNMENT OF KHYBER PAKHTUNKHWA,  
SPORTS, TOURISM, ARCHAEOLOGY, YOUTH AFFAIRS &  
MUSEUMS DEPARTMENT.  
13-A, KHYBER ROAD, PESHAWAR CANTT:

"H"

-16-

No: SO (T)/DTS/6-17/2021/2188-90  
Dated Peshawar the 13<sup>th</sup> December, 2021

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Establishment Department, Peshawar.

Subject: POSTING OF MUHAMMAD ARABI, DEPUTY DIRECTOR (BS-18)  
AGAINST THE POST OF DIRECTOR GENERAL, DIRECTORATE OF  
TOURIST SERVICES, KHYBER PAKHTUNKHWA AS PER  
RECOMMENDATION OF PSB

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of summary duly approved by Chief Minister, Khyber Pakhtunkhwa along with minutes of the Provincial Selection Board (PSB) meeting held on 30-07-2021.

2. I am further directed to request to notify promotion of Muhammad Arabi, Deputy Director (BS-18) to the post of Director General (BS-19), Directorate of Tourist Services, Khyber Pakhtunkhwa with immediate effect as per recommendations of PSB for one day actualization ONLY and subsequently post the officer against the newly created post of Additional Director General, Directorate of Tourist Services, Khyber Pakhtunkhwa, while Mr. Ghulam Saeed (PMS BS-19), will continue to work on the same post afterwards, please.

Yours faithfully,

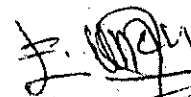
  
13/12/2021  
Section Officer (Tourism)

Endst: and date even:

Copy forwarded to:

1. PS to Secretary, Sports & Tourism Department, Khyber Pakhtunkhwa.
2. Master File.

ATTESTED

  
Section Officer (Tourism)



17- "9" 9

No. DTS-PR-1(67)/09  
Government of Khyber Pakhtunkhwa  
Directorate of Tourist Services  
4th Floor, FC Plaza, Sunehri Masjid Road  
Peshawar, the 06th September, 2021

The Secretary to the Government,  
Sports, Tourism, Archaeology, Youth Affairs & Museums Department  
13 A, Khyber Road, Peshawar

Subject: NOTIFICATION FOR PROMOTION TO THE POST OF DG (BS-19) DTS.

Dear Sir,

Reference the subject noted above and in light of the recommendation of the Board in the Provincial Selection Board (PSB) meeting held on 30.07.2021 regarding "Promotion of Deputy Director BS-18 to the Post of Director General BS-19 DTS" it is stated that I, Muhammad Arabi, have been recommended for promotion to the post of DG BS-19 DTS while the necessary notification has still not been issued.

In order to assume proper charge of the recommended post of DG BS-19 it is, therefore, requested that the notification may be issued. please

Muhammad Arabi  
Deputy Director

Copy for information to:

- 1. PS to Chief Secretary, Khyber Pakhtunkhwa

*o/c*

Directorate of Tourist Services F.C Plaza  
4th Floor Peshawar Cantt

03 SEP 2021

5702

to 570

Directorate of Tourist Services F.C Plaza  
4th Floor Peshawar Cantt

ATTESTED

**BETTER COPY OF THE PAGE NO. 17**

No. DTS-PR-1(67)/09  
Government of Khyber Pakhtunkhwa  
Directorate of Tourist Services  
4<sup>th</sup> Floor, FC Plaza, Sunerhi Masjid Road,  
Peshawar, the 06<sup>th</sup> September, 2021

The Secretary to the Government,  
Sports, Tourism, Archeology, Youth Affairs & Museums  
Department, 13-A, Khyber Road, Peshawar.

Subject: **NOTIFICATION FOR PROMOTION TO THE POST OF  
DG (BS-19) DTS.**

Dear Sir,

Reference the subject noted above and in light of the recommendation of the Board in the Provincial Selection Board (PSB) meeting held on 30.07.2021 regarding "Promotion of Deputy Director BS-18 to the Post of Director General BS-19 DTS" it is stated that I, Muhammad Arabi, have been recommended for promotion to the post of DG BS-19 DTS while the necessary notification has still not been issued.

In order to assume proper charge of the recommended post of DG BS-19 it is, therefore, requested that the notification may be issued, please.

Muhammad Arabi  
Deputy Director

Copy for information to:

1. PS to Chief Secretary, Khyber Pakhtunkhwa.

Directorate of Tourist Services F.C Plaza  
4<sup>th</sup> Floor Peshawar Cantt

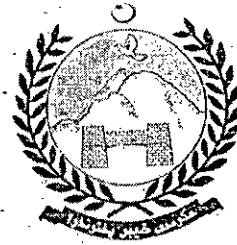
08 Sep 2021  
5702 to 570  
SD/-

**ATTESTED**

"J"

"J"

EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. PIII  
GAZETTE

# KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, WEDNESDAY, 13TH JUNE, 2018.

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

## NOTIFICATION

Dated Peshawar, the 31<sup>st</sup> October, 2017.

**No. SO (DTS)6-17/2017/Service Rules:-** In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Sports, Culture, Tourism, Archaeology and Youth Affairs Department, in Consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions, specified in column No.3 to 5 of the Appendix to this Notification, which shall be applicable to the posts in the Directorate of Tourist Services Khyber Pakhtunkhwa. specified in column No.2 of the said Appendix.

### APPENDIX

S.No.	Nomenclature of the post.	Minimum qualification for appointment by initial recruitment or by transfer.	Age limit.	Method of recruitment.
1	2	3	4	5
1.	Director General (BPS-19).			By promotion, on the basis of seniority-cum-fitness from amongst the Deputy Directors having twelve years service in BPS 17 and above; jkl and Provided that if no suitable person is available for promotion then by transfer from amongst PMS or PAS officers.

-18-

TESTED

2.	Deputy Director (BPS-18).	---	---	<p>By promotion, on the basis of seniority-cum-fitness from amongst the Assistant Directors, Assistant Controllers, Law Officers and Admin and Accounts Officers having five years service as such: Provided that if no suitable person is available for promotion then by transfer from amongst PMS or PAS officer.</p> <p><b>Note:</b> For the purpose of promotion a joint seniority list of Assistant Directors, Assistant Controllers, Law Officers and Admin and Accounts Officers shall be maintained.</p>
3.	Law Officer (BPS-17).	At least Second Class LLB Degree from a recognized University with three (03)years experience at the Bar.	25 to 35 years.	<p>(i) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Legal Assistants with three years service as such: Provided that if no suitable person is available for promotion then by initial recruitment; and</p> <p>(ii) fifty percent by initial recruitment.</p>
4.	Assistant Director (BPS-17)	At least Second Class Master's Degree in Tourism and Hospitality, Economics, Public Administration, Business Administration or equivalent qualification from a recognized University with two years experience in tourism sector.	24 to 34 years.	By initial recruitment.
5.	Assistant Controller (BPS-17).	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Inspectors with three years service as such.
6.	Admin and Accounts Officer (BPS-17).	At least Second Class Master's Degree in Commerce, Business Administration (Finance) or equivalent qualification from a recognized University with two years relevant experience.	24 to 34 years.	<p>(i) Thirty-three percent by promotion, on the basis of seniority-cum-fitness from amongst the Superintendents with three years service as such: Provided that if no suitable candidate is available for promotion, then by initial recruitment; and</p> <p>(ii) sixty seven percent by initial recruitment.</p>

-19-

ATTESTED

Superintendent (BPS-17).	-----	-----	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Stenographers with at least five years service as such.  <b>Note:</b> For the purpose of promotion a joint seniority list of Assistants and Stenographers shall be maintained.
Inspector (BPS-16)	(a) At least Second Class Bachelor's Degree or equivalent qualification from a recognized University; and (b) Height...five feet and seven inches, Chest thirty three inches with expansion of one and half (1½) inches.	21 to 30 years.	(i) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Sub-Inspectors with at least five years services as such: Provided that if no suitable person is available for promotion, then by initial recruitment; and (ii) fifty percent by initial recruitment.
Legal Assistant (BPS-16).	At least Second Class LLB Degree from a recognized University with two years experience at the Bar.	25 to 35 years.	By initial recruitment.
Assistant (BPS-16).	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University.	20 to 32 years.	(i) Seventy five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks and Accountants with at least five years service as such: Provided that if no suitable person is available for promotion, then by initial recruitment; and (ii) twenty five percent by initial recruitment.  <b>Note:</b> For the purpose of promotion, a joint list of Senior Clerks and Accountants shall be maintained.
Stenographer (BPS-16).	At least Second Class Bachelor's Degree from a recognized University with— (a) a speed of seventy (70) words per minute in shorthand in English and forty-five(45) words per minute in typing; and (b) knowledge of Computer in using MS Word and MS Excel.	20 to 32 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the Steno Typists with at least five years service as such: Provided that if no suitable person is available for promotion, then by initial recruitment.

-20-

ATTESTED

12.	Computer Operator (BPS-16).	(a) At least Second Class Bachelor's Degree in Computer Science / Information Technology (BCS / BIT four years), from a recognized University; or (b) At least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.	21 to 32 years.	By initial recruitment.
13.	Sub-Inspector (BPS-14).	(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University; and (b) Height...five feet and seven inches, Chest thirty three inches with expansion of one and half (1½) inches.	21to32 years.	(i) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Sub-Inspectors with three years service as such: Provided that if no suitable person is available for promotion then b initial recruitment; and (ii) fifty percent by initial recruitment.
14.	Senior Clerk (BPS-14).	---	---	By promotion, on the basis of seniority-cum-fitness, from among the Junior Clerks with at least two years service as such.
15.	Steno Typist (BPS-14).	At least Second Class Intermediate School Certificate or its equivalent qualification from a recognized Board with— (a) a speed of fifty (50) words per minute in shorthand in English and thirty five (35) words per minute in typing; and (b) knowledge of Computer in using MS Word and MS Excel.	18to30 years.	By initial recruitment.
16.	Accountant (BPS-14).	(a) At least Second Class Bachelor's Degree in Commerce, Business Administration or equivalent qualification from a recognized University; and (b) A proficiency in accounts related software.	21to28 years.	By initial recruitment.

-21-

ATTESTED

17.	Junior Clerk (BPS-11).	<p>(a) At least Second Class Secondary School Certificate or its equivalent qualification from a recognized Board; and</p> <p>(b) Typing speed of thirty (30) words per minute on Computer.</p>	18to30 years.	<p>(i) Thirty three percent by promotion, on the basis of seniority-cum-fitness from amongst the Dispatch riders, Duplicate Machine Operators, Naib Qasids and Farashs having Secondary School Certificate; and</p> <p>(ii) sixty-seven percent by initial recruitment.</p> <p><b>Note:</b> for the purpose of promotion a joint seniority list of Dispatch Riders, Duplicate Machine Operators, Naib Qasids and Farashs etc shall be maintained with reference to the dates of their acquiring the Secondary School Certificate:</p> <p>Provided that—</p> <p>(a) if two or more officials have acquired the Secondary School Certificate in the same session, the inter-se-seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and</p> <p>(b) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>
18.	Assistant -Sub-Inspector (BPS-09).	<p>(a) At least Second Class Intermediate Certificate or its equivalent qualification from a recognized Board; and</p> <p>(b) Height...five feet and seven inches, Chest thirty three inches with expansion of one and half (1½) inches.</p>	18-28 years.	<p>(i) Thirty-three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Head Constables with three years service as such; and</p> <p>(ii) sixty seven percent by initial recruitment.</p>

-22-

ATTACHED

1793 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 13<sup>th</sup> JUNE, 2018

19.	Head Constable (BPS-07).	(a) At least Second Class Secondary School Certificate or its equivalent qualification from a recognized Board; and (b) Height... five feet and seven inches, Chest thirty three inches with expansion of one and half (1½) inches.	18to28 years.	(i) Thirty-three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Constables with three years service as such; and (ii) sixty seven percent by initial recruitment.
20.	Driver (BPS-06).	Literate with valid driving license of light transport vehicle.  <b>Note:</b> Preference will be given to those who have relevant experience in driving, repair and maintenance of vehicles.	18to40 years.	By initial recruitment.
21.	Dispatch Rider (BPS-05).	At least Second Class Intermediate Certificate or its equivalent qualification from a recognized Board with valid motorbike license.	18to28 years.	(i) Thirty-three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Drivers, Duplicate Machine Operators and Naib Qasids; and (ii) sixty seven percent by initial recruitment.  <b>Note:-</b> for the purpose of promotion, a joint seniority list of the Drivers, Duplicate Machine Operators and Naib Qasids shall be maintained.
22.	Constable (BPS-05).	(a) At least Second Class Secondary School Certificate or equivalent qualification from a recognized Board; and (b) Height... five feet and seven inches, Chest thirty three inches with expansion of one and half (1½) inches.	18to28 years.	By initial recruitment.
23.	Duplicate Machine Operator (BPS-04).	Preferably literate.	18to40 years.	By initial recruitment.
24.	Naib Qasid (BPS-03).	Preferably literate.	18to40 years.	By initial recruitment.

-23-

ATTESTED



KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 13<sup>th</sup> JUNE, 2018 1794

25.	Farash (BPS-03).	Preferably literate.	18to40 years.	By initial recruitment.
26.	Chowkidar (BPS-03).	Preferably literate.	18to40 years.	By initial recruitment.

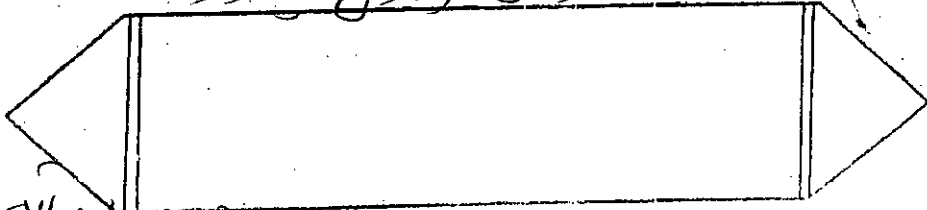
-24-

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

Printed and published by the Manager,  
Staty. Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar.

ATTESTED

بعدالت موصولہ کی تصدیق اور



محمد علی بنام گورنمنٹ ٹیچنگ

2022ء پنجاب (س)

موزخ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آنکے

مظفر الہ آباد

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام کے اتر کر گیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
مقرر کر کے اتر کر گیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقریر ثالثہ فیصلہ برحلاف دینے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور موصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی براندگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
پرواخذہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکورہ کریں۔ لہذا وکالت نامہ لکھد یا کہ مندر ہے۔

المرقوم 05 سنوری 2022ء

بمقام  
کے لئے منظور ہے۔

Attested & Accepted

Accepted  
Rahim