# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

# Service Appeal No. 11549/2020

BEFORE:

MRS. ROZINA REHMAN

MEMBER(J)

MISS. FAREEHA PAUL

MEMBER(E)

Muhammad Shoaib S/o Muhammad Irshad R/o Mohallah Radi Gul Bari Cham Mardan (Naib Qasid at Senior Inspector of Mines at District Mardan).

.... (Appellant)

### Versus

- 1. Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar.
- 2. Government of Khyber Pakhtunkhwa through Senior Inspector of Mine at Muqam Chok, Mardan.
- 3. Government of Khyber Pakhtunkhwa through Secretary Mine & Mineral Department at Civil Secretariat, Peshawar.
- 4. Government of Khyber Pakhtunkhwa through Secretary Establishment at Civil Secretariat, Peshawar.
- 5. Government of Khyber Pakhtunkhwa through Secretary Finance at Civil Secretariat.

... (Respondents)

Mr. Hafeez Ul Asad Shangla

Advocate

For appellant

Mr. Muhammad Jan

District Attorney

For respondents

### **JUDGEMENT**

FAREEHA PAUL, MEMBER (E): The service appeal in hand has been

instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act,

1974, against impugned notification No. SOE/MDD/2-1/Vol-II/2017 dated

- 22.11.2017 published on 25.06.2018, whereby already existing conditions/method/service rules of promotion to the post of Junior Clerk from Naib Qasid on 33% departmental quota in respondent department notified through notification dated 17.10.2010 published on 09.09.2016 were revised; against the impugned letter dated 20.10.2020 communicated to appellant on 27.10.2020, whereby appeal filed by appellant before department for promoting him to the post of Junior Clerk from Naib Qasid on 33% departmental quota as per service rules/method of promotion notified through Notification dated 17.01.2020 published on 09.09.2016 was disposed of/rejected; and against the impugned promotion order dated 28.09.2018 whereby those junior from appellant were promoted.
- 2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as Naib Qasid (BPS-1) in Mines & Mineral Department on 08.01.2013. In the light of method of appointment/rules notified on 17.10.2010, 33% positions of Junior Clerks were to be filled through promotion from amongst BPS-1 and BPS-2 having passed S.S.C and having two years service. The respondents revised/changed the rules/method of promotion to Junior Clerk from Naib Qasid on 33% reserved quota in 2018 and introduced the impugned revised method/rules through notification dated 22.11.2017 published on 25.06.2018 and declared eligible only those wh had passed S.S.C in second division. By changing/revising the method of promotion, the respondents closed the door of promotion from Noto Junior Clerk on the appellant and many others having no 2 S.S.C and hence deprived them from promotion. By issuit appellant was affected and those junior to him were

Junior Clerk on 33% reserved quota through impugned order dated 28.09.2018. The appellant filed writ petition No. 243/2020 for his promotion from Naib Qasid to Junior Clerk which was decided on 16.07.2020 with direction to the appellant to approach the departmental authority and Service Tribunal being competent forum. In the meanwhile, on 12.06.2020 appellant filed departmental appeal for his promotion under the rules dated 17.10.2010 and also reminder on 24.08.2020 which was rejected vide order dated 20.10.2020 received by the appellant on 27.10.2020. Feeling aggrieved the appellant filed the instant appeal on 30.11.2020.

- 3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.
- 4. Learned counsel for the appellant presented the case and contended that promotion of appellant was covered under the rules notified on 17.10.2010, but respondents purposely, on malafide intention, did not call the meeting of Departmental Promotion Committee and deprived him from his legal right of promotion. Revised Service Rules of 2018, in which the condition of second division in S.S.C examination was introduced, deprived the appellant of his due right of promotion to which he was otherwise eligible. He further contended that in pursuance to revised rules, juniors to the appellant were promoted ignoring the seniors which was against the law and equity. He challenged the vires of impugned revised service rules for promotion to the post of Junior Clerk on 33% quota as against the Constitution.

- 5. The learned District Attorney on the other hand contended that the service appeal of the appellant was against the rules whereas departmental appeal was for promotion and hence there was contradiction in both the appeals. As far as amendment in the service rules was concerned, he contended that it was not person specific, rather it was for the entire establishment of Junior Clerks. Moreover, it was in the domain of the government to change the rules and promotion policy at any time as and when it deemed fit.
- After listening the arguments and going through the record available before us it is clear that appellant was appointed as Naib Qasid (BPS-1) in 2013. At that time Service Rules of 2010 were in place which indicated the post of Naib Qasid in BPS-1 and that of Junior Clerk in BPS-7, with the passage of time, the basic scale were upgraded and Naib Qasid was placed in BPS-3 and Junior Clerk in BPS-11 through Service Rules notified in 2017. At the time when the post of Naib Qasid was in BPS-1, the column of qualification at the time of initial appointment was noted to be silent in Rules of 2010 and in 2017 when it was upgraded to BPS-3 it was noted "literate". For promotion to the post of Junior Clerk (BPS-7), in 2010 the qualification for 33% promotion quota was S.S.C which was modified in 2017, when the post was upgraded to BPS-11 and condition of 2<sup>nd</sup> class S.S.C was inserted. We feel that the government had the right to modify and upgrade the qualification with the upgradation of post from BPS-7 to BPS-11. It is evident that the amendment in service rules is not person specific rather it is for the entire cadre and meant to bring improvement in it.

- 7. In view of the above, the appeal is dismissed. Parties are left to bear to their own costs. Consign.
- 8. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 27<sup>th</sup> day of September, 2022.

(ROZINA REHMAN)

FAREEHA PAUL) Member (E) Service Appeal No. 11549/2020

1. Mr. Haseez Ul Asad Shangla, Advocate for the appellant present. Mr.

Muhammad Jan, District Attorney for respondents present. Arguments heard and

record perused.

2. Vide our detailed judgement containing 05 pages, we have arrived at a

conclusion that the appellant was appointed as Naib Qasid (BPS-1) in 2013. At that

time Service Rules of 2010 were in place, which indicated the post of Naib Qasid

in BPS-1 and that of Junior Clerk in BPS-7, with the passage of time, the basic

scale were upgraded and Naib Qasid was placed in BPS-3 and Junior Clerk in

BPS-11 through Service Rules notified in 2017. At the time when the post of Naib

Qasid was in BPS-1, the column of qualification at the time of initial appointment

was noted to be silent in Rules of 2010 and in 2017 when it was upgraded to BPS-3

it was noted as "literate". For promotion to the post of Junior Clerk (BPS-7), in

2010 the qualification for 33% promotion quota was S.S.C which was modified in

2017, when the post was upgraded to BPS-11 and condition of 2<sup>nd</sup> class S.S.C was

inserted. We feel that the government had the right to modify and upgrade the

qualification with the upgradation of post from BPS-7 to BPS-11. It is evident that

the amendment in service rules is not person specific rather it is for the entire cadre

and meant to bring improvement in it. In view of the above, the appeal is

dismissed. Parties are left to bear to their own costs. Consign.

3. Pronounced in open court in Peshawar and given under our hands and seal

of the Tribunal on this 27<sup>th</sup> day of September, 2022.

(ROZINA REHMAN)

Member (

FAREZHA PAUL)

Member (E)

# IN THE SUPREME COURT OF PAKISTAN (Appellate Jurisdiction)

PRESERT:

Mr. Justice ljaz ul Ahsun

Mr. Justice Munit Akhtar

Mr. Justice Dayyed Mazahar Ali Akbar Maqvi

CIVIL APPEAL NO. 2039 OF 2019 AND CIVIL PETITIONS HO.91-

FARD 92-P OF 2016.

(Against the judgments dated 13.02.2017/04.06.2015/08.12.2015 of the Peshawar High Court, Abbottabad Bench, Abbottabad/Peshawar High Court, Bannu Bench, Bannu passed in Writ Petitions No.559-A/2016, 58-B/2014 and 87-B/2014)

Government of KPIC through Secretary (E & S) Education, Peshawar etc.

...Appellant(s)/Petitioner(s)

(in all cases)

Versus

Fazal Qadeem etc. Waris Khan Yasmin

In C.A.2039/2019
In C.P.91-P/2016
In C.P.92-P/2016
...Respondent(s)

For the Appellant(s)/ Petitioner(s): Mr. Zahid Yousaf Qureshi, Addl.A.G.

Mr. Sharafat Khan, DDEO

Mr. Muliammad Idrees, Litigation

Officer

Mr. Ashraf Ullah Khan, Legal Officer

(In all onses)

For Respondent No.1 & 2:

Mr. Misbah Ullah Khan, ASC

[In C.A.2039/2019]

For Respondent No.2:

Nemo.

(ie C.A.2039/2019)

For the Respondent(s):

Not represented

in C.Ps.91-1 & 92-1/2016)

Desir Hearing:

luta id f

06.04.2022

## ORDER

Ijaz ul Alisan, J.- Civil Appeal No.2039/2019 by leave,

of the Court arises out of a judgment of the Peshawar High Court dated 13.02.2017. Through the impugned judgment, the learned High Court by relying on two other judgments of the same High Court rendered in Writ Petition No.1041-A/2015 and a Division

Shillor Caust Associate Sucrema Coust of Pakish

Scanned with Cam! Scanned with CamScanner Bench judgment dated 04.06.2015 has directed the appellanta to promote the respondents to the post of SST and not to refuse their due right of promotion from PSHT to SST on the ground of having passed their BA examination in the 3rd division.

- 2. At the very outset, we have asked the learned counsel for the respondents as to how the petitions were maintainable before the marned High Court in view of the fact that admittedly the respondents are civil servents and the stance taken by the appellants that the respondents are not qualified for such promotion. The learned High Court has erroncously proceeded on the premise that the matter relates to fitness of the respondents and, therefore, the Tribunal lacked jurisdiction to adjudicate the matter. We are unfortunately anable to agree with the said view. It is clear and obvious to us that lack of qualification does not have any nexus to fitness for promotion. Consequently the matter being of qualification or lack thereof relates to terms and conditions of service fell within the purview of jurisdiction of the Federal Service Tribunal and the bar on the jurisdiction on the High Court in terms of Article 212 of the Constitution of Islamic Republic of Pakistan was fully attracted.
  - 3. In this view of the matter, the judgment of the learned. High Court is unsustainable. It is accordingly set aside. The appeal is accordingly allowed.
  - We note that Civil Petition No.92-P/2016 has been filed against a judgment of the Peshawar High Court dated 08.12.2015 in Writ Petition No.87-B/2014 titled "Mst. Yasmin Vs. Government of Khyber Pakhtunkhwa etc." and Civil Petition No.91-P/2016 against a judgment of the Peshawar High Court dated 04.06.2015 in Writ Petition No.88-B/2014 titled "Waris Khin Vs. Government of Khyber Pakhtunkhwa and 05 others". We have also been informed that the judgment in the case titled "Muhammad Baqi Vs. Government of Khyber Pakhtunkhwa through Secretory Elementary & Government of Khyber Pakhtunkhwa through Secretory Elementary &

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Secondary Education), Peshawar and 02 others" which has been relied upon by the Penhawar High Court in the impugned judgment was challenged before this Court but was dismissed on account of limitation and was not decided on merits.

Civil Petitions No.91-P and 92-P/2016 have been filed 5. beyond the period of limitation. The applications for condonation of delay (C.M.As.No.149-P and 151-P/2016) do not disclose any sufficient cause that may constitute basis contemplation of the Limitation Act, 1908 for condonation of delay. Consequently, the applications for condonation of delay are dismissed. The petitions are dismissed as barred by time. It is, however, clarified that the judgment dated 08.12.2015 rendered in Writ Petition No.87-B/2014 titled "Mst. Yasmin Vs. Government of Khyber Pakhtunkhwa etc.", judgment dated 04.06.2015 rendered in Writ Petition No.58-B/2014 titled "Waris Khan Vs. Govt. of Khyber Paklitunkhwa and 05 others" and the judgment dated 05.04.2016 rendered in Writ Pctition No.1041-A/2015 titled "Muhummad Baqi Vs. Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Peshawar and 02 others" shall not be used as precedent in any other case. Cerilled to be

SUPREMIE COURT

Senior Court Access Compress Court of Fall

Islamabad, the
6th of April, 2022
Not approved for reporting
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16.05.2022

Counsel for appellant present. Mr. Zaka Ullah Assistant Director alongwith Mr. Naseer Ud Din Shah Assistant Advocate General for the respondents present.

Representative of the respondents submitted reply/comments. Copy of the same was handed over to the learned counsel for appellant who requested for adjournment in order to go through the reply/comments. To come up for rejoinder, if any, as well as arguments before the D.B on 18.07.2022.

(Rozina Rehman) Member (J)

(Salah-Ud-Din) Member (J)

18.07.2022

Appellant in person present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Former requested for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 13.09.2022 before D.B.

(Fareena Paul) Member(E) (Rozina Rehman) Member (J)

12.09.2022

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Arguments heard. To come up for order on 27.09.2022 before D.B.

(Fareeha Paul) Member(E) (Rozina Rehman) Member(J)



Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

Chaikman

09.11.2021

Counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Reply on behalf of respondents was not submitted. Learned A.A.G made a request for time to submit reply/comments; granted with direction to furnish the same within 10 days in office, positively. If the reply/comments are not submitted within stipulated time, right of respondents for submission of reply shall be deemed as struck off. To come up for arguments on 04.02.2022 before D.B.

·. D.

(Mian Muhammad) Member (E)

(Rozina Rehman) Member (J)

04.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 16.05.2022 for the same as before.

Reader

22.06.2021

Counsel for the appellant present and stated that due to unavoidable circumstances Security and process fee could not be deposited. He submitted an application for further time to deposit the same.

The appellant is directed to deposit security and process fee within three days positively. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of the notice, positively. If the written reply/comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 09.11.2021 before the D.B.

Appellant Deposited
Sectivity & Process Fee



The amended service appeal was submitted by the appellant on 30.11.2020 which at present forms part of the record.

It is contended that the appellant was appointed as Naib Qasid BPS-01 on 08.01.2013. At the relevant time eligibility and qualification for promotion to the post of Junior Clerk BPS-07, for the officials in BPS-01 and BPS-02, was Secondary School Certificate from a recognized board and at least two (02) years service as such. On 25.06.2018 another notification was issued regarding amendment(s) in the former notification dated 17.10.2018. Through the latter, the eligibility for promotion to the post of Junior Clerk BPS-11 was amended and passing of SSC in second class was prescribed amongst other changes. In view of the learned counsel the impugned amendment adversely effected the promotion chances of appellant. Besides the same were not field at the time of appointment of appellant as Naib Qasid. Relies on 2019 PLC (CS) 1699.

Apparently the impugned amendment, for all particular purposes, creates hindrance in the promotion line of the appellant which is not recognized by the law or the Constitution(s). The appeal in hand is, therefore, admitted to regular hearing subject to all just exceptions in view of the available record and arguments of learned counsel. Appellant is required to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 03.05.2021 before S.B.

\**y** Chairmar

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 22.06.2021 for the same as before.

Reader

# Form- A

# FORM OF ORDER SHEET

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	Case No	/2020
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/10/2020	The appeal of Mr. Muhammad Shoaib presented today by Mr Hafeez-ul-Asad Shangla Advocate may be entered in the Institution Registe
		and put up to the Worthy Chairman for proper order please.
·		REGISTRAR
2-		This case is entrusted to S. Bench for preliminary hearing to be pu up there on 16/11/20.
		Mm.
		CHAIRMAN
	16.11.2020	Junior to counsel for the appellant present.
		Appellant has submitted an application for permission to file amended memo. of appeal. The
		reason agitated is that the departmental appeal, filed before the Departmental Authority, has been rejected
		during pendency of instant appeal through office order
	`.	dated 20.10.2020. Application placed on record.
		The appellant may submit amended appeal on or before next date of hearing. To come up for preliminary
_ :		hearing on 03.02.2021 before S.B.
		Chairman
1		l

# 1

# BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Amended Service Appeal No <sub>-</sub>	/2020
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in Service Appal No- 1549/2020 Muhammad Shoaib

<u>VERSUS</u>

• Government of KP and others

put up to the court will

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	7.	Copy of the seniority list and impugned order	'E & F'	33-56
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Appellant

Through:

(HAFEEZ-UL-ASAD, SHANGLA)

Advocate,

High Court, Peshawar Cell # <u>0314-5951897</u>

Dated: -30-11-2020

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,

<u>PESHAWAR</u>

c	Amended Service Appeal No	/ 2020	in SJA N	, j-
			115	_
Muha	ammad Shoaib S/O Muhammad Irsl	had R/O Mohalla	ah Radi Gul	
Bari	Cham Mardan (Naib Qasid at Se	enior Inspector	of Mine at	

# V E R S U S

 Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar

District Mardan).....(Appellant)

- 2. Government of Khyber Pakhtunkhwa through Senior Inspector of Mine at Muqam Chowk, Mardan
- 3. Government of Khyber Pakhtunkhwa through Secretary Mine and Mineral Department at Civil Secretariat, Peshawar
- 4. Government of Khyber Pakhtunkhwa through Secretary Establishment at Civil Secretariat, Peshawar
- 5. Government of Khyber Pakhtunkhwa through Secretary
  Finance at Civil Secretariat, Peshawar......(Respondents)

Amended appeal under Section 4 of Khyber Pakhtunkhwa Service Tribunal Act 1974:-

For declaring vires of the impugned notification
 No SOE/MDD/2-1/Vol-II/2017 dated 22-11-2017
 published on 25-06-2018, whereby already

M.SKS

existing conditions/method/service rules of promotion to the post of Junior Clerk from Naib Qasid on 33% departmental quota in Respondent department notified through notification No SO.Admn (MD) 1-6/88 Vol-V dated 17<sup>th</sup> October, 2010 published on 09-09-2016 were revised and new impugned conditions/method/service rules introduced through which conditions of at least 2<sup>nd</sup> division in SSC for promotion to Junior Clerk from Naib Qasid on 33% quota in Respondent department at serial No 24 on impugned notification declared mandatory, against the constitution, law and passed/issue without lawful authority, hence void, ab-initio.

For declaring the impugned order through letter No CIM/ Admn/Court case/M.Shoaib/2020/5681 dated 20<sup>th</sup> October, 2020 communicated to Appellant on 27-10-2020, whereby appeal filed by Appellant before department for promoting him to the post of Junior Clerk from Naib Qasid on 33% departmental quota as per service rules/method of promotion notified through notification No SO-Admn (MD) 1-6/88 Vol-V dated 17-1-2020 passed on 09–09-2016 was disposed of/rejected, against the law and passed without

M.SKY

ii.

lawful authority, hence ineffective upon the right of Appellant.

iii.

For declaring the promotion order dated 28<sup>th</sup> September, 2018 of those juniors from Appellants and passed under the impugned revised service rules issued through notification dated 22<sup>nd</sup> November, 2017 published on 25-06-2018 without lawful authority, hence void abinitio and consequently the Appellant may kindly be declared fit for promotion to the post of Junior Clerk from Naib Qasid under 33% departmental quota as per service rules/method notified through notification of promotion SO.Admn (MD) 1-6/88 Vol-V dated 17-10-2010 09<sup>th</sup> September, 2016 published on Respondents may kindly be directed to promote him to the post of Junior Clerk from Naib Qasid on the basis of 33% departmental quota with all back benefits.

Departmental appeal was disposed of/rejected during the pendency of above mentioned service appeal, hence after obtaining permission, this amended service appeal.

MSL; Respectfully Sheweth:

Brief facts of the instant appeal are as under:-

(4)

- That after passing SSC examination in the year 2006 the Appellant was initially appointed as Naib Qasid (BPS-1) in Mines and Mineral Department with effect from 08-1-2013 through office order No 1170-74/3/496 DGMM/Admin. (Copy of the SSC and appointment letter is attached as Annex 'A and B').
- 7) That Respondent reserved through method of appointment /rules notified on 17-10-2010. 33% of Junior Clerk to be fill through promotion from amongst BPS-1 and BPS-2 having passed SSC and having 02 years service. (Copy of the rules is attached as Annex 'C').
- That thereafter the Respondent revised/changed the rules/method of promotion to Junior Clerk from Naib Qasid on 33% reserved quota and in 2018 introduced the impugned revised method/rules through notification No SOE/MDD/2-1/Vol-II/2017 dated 22-11-2017 published on 25-6-2018 and declared eligible only those who have passed SSC in 2<sup>nd</sup> division. (Copy of the impugned rule is attached as <u>Annex 'D'</u>).
- 4) That by changing/revising the initial method/rules of promotion, the Respondents closed the door of promotion of junior clerk from Naib Qasid on Appellant and many other having no 2<sup>nd</sup> division in SSC and hence deprived Appellant from promotion, which was his constitutional protected right.

MSKS

5) That issuing revised rules seniority of Appellant was effected and those junior from Appellant were promoted to junior clerk on 33% departmental reserved quota through

and impugned order is attached as Annex 'E & F').

impugned order dated 28-09-2018. (Copy of seniority list

That thereafter, Appellant filed W.P No 243-P/2020 for his promotion to junior clerk (BPS-11) from Naib Qasid (BPS-3) which was decided on 16-07-2020 with direction to Appellant to approach the departmental authority and Service Tribunal being a competent forum. (Copy of the

writ petition is attached as Annex 'G').

- 11-06-2020 **Appellant** filed meanwhile 7) That on departmental appeal for his promotion under the rules notified through notification SO.Admn (MD) 1-6/88 Vol-V 17-10-20**2**0 published on 09-09-2016 and dated reminder on 24-08-2020 for deciding the appeal, which was disposed of/rejected under impugned revised rules through impugned order/letter No CIM/Admn/Court Case/M.Shoaib /2020/5681 dated 20-10-2020 received by Appellant on 27<sup>th</sup> October, 2020. (Copy of the departmental appeal and order is attached as Annex 'H & I').
- 8) That now Appellant having no other adequate remedy except to file this amended appeal on the following grounds amongst other:-

M.Shy

# **GROUNDS:-**

- A) That promotion of Appellant was covered under the rules notified through notification SO.Admn (MD) 1-6/88 Vol-V 17-10-2020 published dated on' 09-09-2016; Respondents purposely on mala-fide intention did not conducted/call the Departmental Promotion Committee hence deprived Appellant meeting and from constitutional legal right of promotion.
- Appellant from his legal right to promotion to the post of junior clerk (BPS-11) on 33% quota, which is against the constitution and law, hence liable to declared void abinitio.
- C) That all the promotion order made under impugned Revised Service Rules of 2018 of junior clerk from Naib Qasid of the juniors in seniority from Appellant are liable to be declared against the constitution, law and passed without lawful authority whether passed through impugned order dated 28-09-2018 or otherwise.
- That impugned revised rules/method of promotion under 33% quota encourage the policy of pick and choice while constitution provides and encourage equal opportunity to all, hence impugned revised rules and impugned promotion order passed under it to the post of junior clerk on 33%

M.SKj

(7)

departmental quota are liable to be declared without lawful authority, hence void ab-initio.

- E) That Appellant perfoming his duties with due diligence since his appointment and no complaint is against him uptill now.
- That promotion of juniors and ignoring seniors is against the law and equity and introduction of rules/method of promotion of his own choice by the Respondent will encourage the policy of pick and chose and will discourage the civil servant to perform his duties with due diligence.
- G) That vires of impugned revised service rules for promotion to the post of junior clerk on 33% departmental quota are against the constitution, law, fundamental rights as guaranteed under the constitution and passed by Respondents without having lawful authority, hence liable to be declared void ab-initio.
- H) That disposal/rejection of the appeal of the Appellant through impugned order/letter dated 20-10-2020 under impugned revised service rules/method of promotion is against the right of Appellant protected under constitution, hence liable to be declared passed without lawful authority by the Respondents.
- I) That any other ground, not raised specifically may graciously be allowed to be raised at the time of arguments.

(8)

## PRAYER:-

It is, therefore, most respectfully prayed that on acceptance of this amended service Appeal, the instant Appeal may kindly be allowed as prayed for in favour Appellant.

Any other relief, which this Honourable Court deems proper and fit may kindly be granted/passed in favour of Appellant against the Respondents.

# **INTERIM RELIEF:-**

By way of interim relief, the Respondents may kindly be restrained to not promote on 33% departmental reserved quota to the post of Junior Clerk (BPS-11) from Naib Qasid (BPS-3) till the final final disposal of instant amended appeal.

**Appellant** 

Through:

(HAFEEZ-UL-ASAD SHANGLA)

Advocate,

Dated: -30-11-2020

High Court Peshawar

# NOTE:-

No such amended appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one.

Advocate

# BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, **PESHAWAR**

Muhammad Shoaib...... .....(Appellant)

<u>V E R S U S</u>

Government of KP and others.....(Respondents)

### **AFFIDAVIT**

1, Muhammad Shoaib S/O Muhammad Irshad R/O Mohallah Radi Gul Bari Cham Mardan (Naib Qasid at Senior Inspector of Mine at District Mardan), do hereby solemnly affirm and declare on oath that all the contents of accompanying Amended Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

> DEPONENT M. SLA CNIC # 16101-6008142-1 Cell # 0313-5725205

Identified by:-

(HAFEEZ-UL-ASAD SHANGLA)

Advocate

High Court, Peshawar

30.11.20 Mukhtar Ahmed Gheznav Oath Continues oner

District Coult. Hesnawar



# BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

# Muhammad Shoaib VERSUS

Government of KP and others

# MEMO OF ADDRESSES

# **APPELLANT**

Muhammad Shoaib S/O Muhammad Irshad R/O Mohallah Radi Gul Bari Cham Mardan (Naib Qasid at Senior Inspector of Mine at District Mardan)

# **RESPONDENTS**

- Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar
- 2. Government of Khyber Pakhtunkhwa through Senior Inspector of Mine at Muqam Chowk, Mardan
- 3. Government of Khyber Pakhtunkhwa through Secretary Mine and Mineral Department at Civil Secretariat, Peshawar
- 4. Government of Khyber Pakhtunkhwa through Secretary
  Establishment at Civil Secretariat, Peshawar
- 5. Government of Khyber Pakhtunkhwa through Secretary
  Finance at Civil Secretariat, Peshawar

Appellant

Through:

(HAFEEZ-UL-ASAD SHANGLA)

Advocate,

High Court, Peshawar

H.T

Dated: -30-11-2020

$\mathcal{B}$	S.No. 121907
	Roll No.
	Group. Humanities
	Board of Intermediate and Secondary Education
	Mardan N.W.J.P.Nakistan
	SECONDARY SCHOOL CERTIFICATE
	SESSION 2006 - Supplementary
	This is to certify thatMUHAMMAD SHOAIBSon ofMUHAMMAD IRSHAD
	Mardan, held in Sep / Oct, 2006 as a Private candidate. He obtained 407 Marks out of 1050 and has been placed in Grade E
	representing Satisfactory. The canditate passed the following subjects:
	1. English 2. Urdu 3. Islamiyat (Comp) 4. Pakistan Studies 5.: Mathematics 6. General Science 7. Islamic Studies 8. Art & Model Drawing
	It is date af birth according to admission form is (in figures) 15.04.89 in words) 15th April N/H Eighty Nine.
	Marshellare.  Asstt Secretary  Secretary
	Passed With Grace Marks.
ATTESTE	This certificate is issued without alteration or erasure





Anx-



DIRECTORATE GENERAL OF MINES AND MINERALS KHYBER PAKHTUNKHWA ATTACHED DEPARTMENT COMPLEX KHYBER ROAD PESHAWAR

/3/496/DGMM/Admn: Dated

### OFFICE ORDER

On the recommendations of the Departmental Selection Committee, Mr. Muhammad Shoaib S/o Muhammad Irstad, R/o Ridi Gul Barhi Chum Mardan, is hereby appointed as Naib Qasid (BPS-1) (4800-150-9300) plus usual allowances with effect from 08-01-2013 (Fore-noon) on the terms and conditions already conveyed to him vide this Directorate letter No.201/1/17/DGMM/Admn: dated 07-01-2013.

He is posted in the office of Senio: Inspector of Mines Mardan

Sd/-**Director General Mines and Minerals** Khyber Pakhtunkhwa.

Endst. No. 1170-74./3/496/DGM:M/Admn:

Dated \_\_/\_\_\_/01/2013

A copy is forwarded to:

- The District Accounts Officer Mardan.
- The Senior Inspector of Mines, Mardan.
- The Assistant Director (Accounts), H.Q. Office Peshawar.
- Mr. Muhammad Shoaib, Naib Clasid, o/o the Senior Inspector of Mines Mardan.

File No. 1/17-Admn:

(MUHAMMAD ARSHAD) Administrative Officer For /Director General

191/2013 nete-

Office of the nbour Wells on Deci-

STATE OF THE PARTY OF THE PARTY

To,

The Senior Inspector of Mines Mardan Division, Mardan.

Sub; D/Sir, APPOINTMENT AS NAIB OASID (BPS-1) / HESINGL REPORT

Refer to Directorate General Mines & Minerals, Khyber Pukhtunk N. Jett. N. 201/1/17//DGMM/ dated 7/1/2013, and to accept the terms and conditions mentioned in the Helletter.

I hereby report for joining duty w.e.f. § 1 2013 (F N) as Nath Qusid according y. and submit my medical certificate from M. Superintendent DHQ Hospital, Mardai.

Submitted for necessary action please.

Your's faithfully

Muhammad Shoaib S() Muhammad Irshad, Muhammad Irshad, Moh:Redi Gul Bari Cham Mardan.

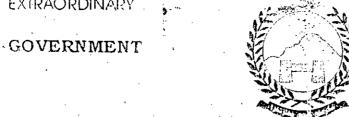
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GAZETTE



# KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 9TH SEPTEMBER. 2016

# GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT & ADMN: DEPARTMENT (REGULATION WING)

### NOTIFICATION

Dated Peshawar, the 17th October, 2010

No. SO-Admn (MD) 1-6/88 Vol-V. - In pursuance of the provisions contained in sub-tide (2) of rule-3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules 1989, and in supersession of all Notifications issued in this behalf, the Minerals . Development Department, in consultation with the Establishment Department and the Finance Department, hereby lay down the method of recruitment, qualifications and other conditions -specified in column No.3 to 5 of the Appendix to this Notification which shall be applicable to the posts borne in the Directorate General Mines & Minerals, Khyber Pakhtunkhwa specified in Column No.2 of the said Appendix.

> Secretary to Govt. of Khyber Pakhtunkhwa Mineral Development Department

Printed and published by the Manager,

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79 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016

# DIRECTORATE GENERAL MINES AND MINERALS

S.No.	Nomenclature of the Post	Minimum Qualification Prescribed for Appointment By Initial Recruitment.	Age Limit	Method of Recruitment
1	2	3		
	Director General		4	5
	Mines and Minerals (BPS-20)			(a) By promotion, on the basis of selection on ment, amongst the Director Exploration (Minerals). Dir Licensing, Chief Inspector of Mines and Cornmissioner N Labour Welfare, having at least seventeen years serviced by the second of the seco
				BPS-17 and above, and in case of persons initially appoin BS-18, the length of service for promotion to the post be twelve years in BPS-18 and above; or.  (b) By transfer from the provincial Government Department
2	Circoto- E. J.	EXPLORATION PROMOTION E	DIVISION	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
(	Director Exploration (Minerals) (BPS-19)			By promotion, on the basis of seniority-cum-fitness, from amo the Deputy Directors (Exploration) with at least twiction y service in BPS-17 and above.
(	Deputy Director (Exploration) (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from amo
4. \ \	Manager Geographical	(a) Master's Degree in Geographical Information System (GIS)	26	Annual Engineer) with at least five years service as such
	nformation System(GIS) BPS-18)	(b) Minimum of five years Geo-graphical Information System	25 to 45 years	By initial recruitment.
5 A	Assistant Director	related experience from a reputed Organization		
(0	Geologist)	Master's Degree in Geology from a recognized University.	21 to 30	(a) By initial recruitment; or
) (E	3PS-17)		years	(b) if no suitable candidate is available for initial recruitment, if by transfer from amongst the Assistant Directors (Geologis
				+ %

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# KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016. 80

ි	Assistant Director	Bachelor's Degree in Mining Engineering from a recognized	21 to 30	
	(Mining Engineer)	University.		
	(BPS-17)		years	(b) If no suitable candidate is available by initial recruitment, the
				by transfer from amongst the Assistant Directors (Minii Engineers).
7	Geographical Information	(a) Master's Degree in Geographical Information System from	21 to 32	
	System (GIS) Development	a recognized University; or	years	Bý initial recruitment
	Officer (BPS-17)	(b) Master's Degree in Geography/Geology from a recognized	70010	· ·
		University with one-year Diploma in Geographical	Į.	
		Information System from a recognized Institute/University.	,	
3	Database Administrator	Master's Degree in Computer Science or equivalent		
	(BPS-17)	qualification, from a recognized University with one year	21 to 32	By initial recruitment
	1	Dioloma in Goographical Lefermatics Costs	years	
•		Diploma in Geographical Information System from a recognized Institute/University.	-	
<del></del>	Manager			·
٠.	Manager Information	Master's Degree in Computer Science or Business	21 to 32	By initial recruitment
	(BPS-17)	Administration or Geology or equivalent qualification from a	years	oy midai recruitment
	·	recognized University with one year Diploma in Geographical	,	
		Information System from a recognized Institute/University.	•	
)	Librarian	Master's Degree in Library Science from a recognized	24 5- 22	
ı	(CR8-16)	University	21 to 32	Sy initial recruiement
	Computer Technician	1	years	
	(BPS-16)	Bachelor's Degree with Computer Science from a recognized	21 to 32	By initial recruitment
	<u> </u>	University.	years	- y white i sor along the hi
.	Data Entry Operator	Bachelor's Degree with Computer Science from a recognized	21 to 32	
- 1	(BPS-12)	University with 5,000, key depressions per hour for	years	By initial recruitment.
	·	processing/data entry information	y C 21 3	
	Cartographer/Draftsman			
	(BPS-11)	Intermediate with Certificate or Diploma in Cartography from a	21 to 32	By initial recruitment.
	/	recognized Board, with two years experience in AutoCAD/	years	y individual solution of the
		Geographical Information System Software		•
- 1	Silver de la constant	LICENSING DIVISION	<u> </u>	
	Director Licensing			By ocempton, as the basis (
!	·BP\$-19)	·		By promotion, on the basis of seniority-cum-fitness, from amongst
			-	are Deputy Diffectors (Technical), with at least twallong cooks and a series
				in BPS-17 and above

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# 31 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016.

l in	L Deputy Director (Technical)		<del></del>	
.0	Deputy Director (Technical) (BPS-18)			By promotion, on the basis of seniority-cum-fitness from amo the Assistant Directors (Technical) (Mining Engineer)/ Geolo Assistant Directors (Royalty), with at least five years service such.
ta;	Assistant Oceator Technical			2
,	(Mining Engineer) (8PS-17)	Backelor's Degree in Mining Engineering from a recognized University	21 to 30 years	(a) Thirty-five per cent by promotion on the basis of senio cum-fitness from amongst the Mineral Development Office (Technical) with at least five years service as such
-				(b) Fifteen per cent by promotion on the basis of seniority-confitness, from amongst the Mineral Development Office (Non-Technical) with at least five years service as such, and
17,	Geologist (BPS-17)	Master's Degree in Geology from a recognized University	21 to 30	(c) Fifty per cent by initial recruitment.  (a) Fifty per cent by initial recruitment, and
			years -	To) Fifty per cent by promotion on the basis of seniority-cu- fitness from amongst the Mineral Development Office (Technical) with at least five years service as such
13.	Assistant Director (Royalty) (BPS-17)			By promotion, on the basis of semority-cum-fitness, from amonthe Mineral Development Officers (Non-technical) with at least to
.9.	Assistant Director (Survey and Drawing) (BPS:17)			years service as such  By promotion, on the basis of seniority-cum-fitness, from among the Survey and Drawing Officers with at least five years service such
2	Chief Draftsman		• • • •	By promotion, on the basis of seniority-cum-fitness, from among the Draftsmans with at least five years service as such
	Mineral Degionment Officer (Technical) (BPS-16)	Bachelor's Degree in Mining Engineering or Master's Degree in Geology from a recognized University	21 to 30 years	By initial recruitment
	Mineral Development Officer (Non-Technical) (BPS-16)			By promotion on the basis of senionty-cum-fitness, from amongs the post of the Royalty Inspectors with at least 10 years service as
	Survey and Drawing Officer (SPS-16)	(i) Intermediate from a recognized board. (ii) Surveyor Certificate from a recognized Institute, and (iii) Mine Surveyor Certificate granted under the Mines Act 1923 and three years, experience in mine survey	21 to 30 years	such.  (a) Fifty percent by promotion, on the basis of seniority-cum fitness, from amongst the Surveyors with at least five years service as such, and  (b) Fifty percent by initial recruitment

# KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2015. 82

24	Royalty Inspector (8PS-11)	Bachelor's Degree from a recognized University.	21 to 30 years	By initial recruitment
25	Surveyors (BPS-11)	<ul> <li>(a) Intermediate (Pre-Engineering) or equivalent qualification from a recognized Board,</li> <li>(b) Mines Surveyors Competency Certificate under the Mines Act. 1923 and</li> <li>(c) Certificate in Auto CAD from a recognized Institute</li> </ul>	18 to 30 , years	By initial recruitment
25	Draftsman (BPS-11)	Secondary School Certificate or equivalent qualification from a recognized Board, and     Diploma or Certificate in Draftsmanship/Survey from a recognized Institute.	18 to 30 years	(a) Fifty per cent by initial recruitment, and (b) Fifty per cent by promotion on the basis of seniority-cumfitness from amongst the Tracers with at least five years service as such.
27.	Tracer (BPS-05)	Secondary School Certificate or equivalent qualification with drawing as one of the subject from a recognized Board.	18 to 30 years	(a) Eighty per cent by initial recruitment, and (b) Twenty per cent by promotion on the basis of seniority-cum- fitness from amongst the Ferro Printer with at least two years, service as such
28	Ferro Printer (BPS-02)	Secondary School Certificate from a recognized Board.	18 to 30 years	By initial recruitment
29.	Chainman (BPS-01)	Secondary School Certificate from a recognized Board.	18 to 30 years	- By initial recruitment
30.	Mineral Guard (BPS-01)	Secondary School Certificate from a recognized Board	18 to 30 years	By initial recruitment
		INSPECTORATE OF MINES LABOUR	R WELFARE.	
31	Chief Inspector of Mines/ Commissioner Mines Labour Welfare (BPS-19)			(a) By premotion, on the basis of seniority-cum-fitness, from amongst the Senior Inspector of Mines and Deputy Commissioner Mines Labour Welfare with at least twelve years service in BPS-17 and above or  (b) If no suitable candidate is available for promotion then by transfer
32.	Deputy Commissioner Mines 1.9hour Welfure रम ११३-१३१	Bachelor's Degree in Mining Engineering from a recognized University with at least seven years experience in the relevant field.	25 to 40 years	(a) By promotion on the basis of sentority-cum stress, from amongst the Assistant Commissioners Mines Labour Wellare with at least five years survice as such, or (b) If no suitable confincte is available for promotion then by initial recruitment

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# 83 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016.

33	Senior Inspector of Mines/ Rescue Superintendent (BPS-18)			By promotion, on the pasis of semonty-cum-fitness, from a the Inspector of Mines/ Instructor with at least five years ser such
34,	Inspector of Mines/Instructor. (BPS-17)	Mining Engineering from	211-22	such such
	(0-3-11)	recognized University.  (b) First Class Mines Managers Certificate of competence granted under the provision of Mines Act. 1923; and (c) two years experience in Govt or Semi-Govt Mining Industries registered under the Mines Act. 1923  Note:	years /	By initial recruitment.
:		In case of non-availability of candidates possessing the qualification at clause (b) above, a candidate possessing the remaining qualification and experience may be appointed provided that he shall have to pass First Class Mines Manager's Certificate of competency during the probation period failing which his services shall be terminated.		
35				
	Assistant Commissioner Mines Labour Welfare (BPS-17)	Bachelor's Degree in Mining Engineering or Master's Degree in Social Sciences from a recognized University.	21 to 32 years	By initial recruitment
<b>3</b> 6.	Rescue Apparatus Technician (BPS-16)	Three years Diploma in Mechanical Technology from a recognized Polytechnic Institution.	21 to 30	By initial recruitment.
37.	Rescue Supervisor (BPS-16)	Bachelor's Degree in Mining Engineering from a recognized	years 21 to 30	
38.	Secretary Mines	University.	years	By initial recruitment
	(BPS-16)			By promotion, on the basis of seniority-cum-fitness, amongs Project Mechanic with at least three years service as such
9	· '	Three years Diploma in Electrical or Mechanical Engineering from a recognized Institute. Preference will be given to the candidate having some experience in the field	21 to 30 years	By initial recruitment
	Overseer (Pnc + 4)	Three years Diploma in Civil Engineering from a recognized Institute	21 to 32 years	By initial recruitment



# KHYBER PAKHTUNKHWA GOVERNNENT GAZETTE, EXTRAORDINARY, 24th NOVEMISER, 2016. 84

W-	Medical Technican (BPS-11)	(a) Secondary School Certificate, with Science Item a recognized Brand (b) Certificate of Medical Fechnician from a recognized medical faculty, and (c) two years experience in the relevant held:	18.30 years	Symiliai recogniseri
<u>:</u> 4	( 2	- 1億間息 - 1	TORY	(a) By promotion on the basis of Seconty cum finessign from attents twelve years service in BPS-17 and above. (b) If no suitable officer is available for promotion then by initial recruitment.
3	Principal Research Officer (BPS-19)	(a) Bachelor's Degree in Metallurgical or Mining Engineering from a recognized University and (b) at least twelve years experience of Research Development work for Mineral Processing, Up-gradation, Concentration or Extraction conducted in any reputable Research and Development - Organization or Mineral Processing Laboratory or Mineral Based Industry	30 to 45 years	(a) By promotion on the basis of sentority-cum-finess, from amongst the Sentor Mineral Processing, Engineers with tall least twelve years service in BPS-17 and above in (b). If no suitable officer is available for promotion to in by incomplete.
ਜ ਹ	Senior Chemist (BPS-13)		; .	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Chemists with at least five years service in 8PS-17 as such
ಬಿ ಸ	Senior Minasal Processing Engineer (SPS-18)	(a) Bachelor's Degree in Metallurgical or Mining Engineering from a recognized University; and to heast seven years expensing of Research and Development work for Mineral Processing Usignadation. Concentration or Extraction conducted in any reputable Research and Development Organization or Mineral Processing Laboratury or Mineral Based Industry.	23 to 40 years	By initial recruitment
at. Ç	Sector Minarabogist (8PS-15)			By promotion, on the basis of seniority-cum-timess, from amongst the Assistant Mineralogists and Assistant Gemologists with at least five years service in BPS-17 as such.

# 85 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24" NOVEMBER, 2016.

·47 ——-	Assistant Gemologist (BPS-17)	Master's Degree in Geology with Specialization in Mineralogy/Petrology from a recognized University:	25 to 35 years	By initial recruitment
18	Assistant Mineralogist (BPS-17)	Master's Degree in Geology with Specialization in Mineralogy/ Petrology from a recognized University	21 to 32 years	By initial recruitment
49.	Assistant Chemist (BPS-17)	Master's Degree in Chemistry with Specialization in Inorganic/Analytical or Applied Chemistry from a recognized University	21 to 32 years	By initial regruitment
40 <u>.</u>	Estaratory Technician (BPS-14)	Intermediate from a recognized Board with Diploma in Mechanical, Chemical or Electrical from a recognized Technical Board with seven years experience in the relevant field	21 to 32 years	(a) By promotion, on the basis of seniority-cum-fitness if amongst the Junior Laboratory Technician with at least years service in BPS-11 and above  (b) If no suitable person is available for promotion then by in recruitment.
51	Junior Laboratory Technician (BPS-11)	Secondary School Certificate from a recognized Board with Diploma in Chemical/Mechanical or Electrical Technology from a recognized Technical Board with at least five years experience in the relevant field	21 to 32 years	By initial recruitment
)2 ·	Electrical Supervisor (3PS-10)	Secondary School Certificate with Diploma in Electrical Technology from a recognized Technical Board with at least five years experience of work as Electrician in any reputable Organization	13 to 32 years	By intral recruitment
3.	Laboratory Attendant (BPS-01)	Literate	18 to 32 years	By initial recruitment
		COMMON POSTS		
5	Assistant Director (Administration) (BPS-17) Assistant Director			By promotion, on the basis of seniority-cum-fitness, from among the Administrative Officers having three years experience.
i	Assistant Oirector (Accounts) /6PS-17) Assistant Directof			By promotion, on the basis of seniority-dum-fitness, from among the Budget and Accounts Officers having three years expenent as Budget and Accounts Officer.
	Plansing and December; SPS-171	(a) (Bathelors) Degree in Mining Engineering from a recognition University, or Business Administration Commerce Geology and Business from a recognized University.	2) to 32 years	By initial recruitment

### KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016. 86

<u> </u>			<del></del>	111, 24 NOVENBER, 2010. 85
57	Administrative Officer (8PS-16)			By transfer, from amongst the Superintendents.
58	Budget and Accounts Officer (BPS-16)			By transfer, from amongst the Superintendents,
- 59,	Superintenident / (BPS-16)			By promoting on the basis of congestive
				service as such
				Note: Joint seniority of Assistants and Senior Sca Stenographers shall be maintained for the purpose of promotion the post of Superintendent Provides
				continuous appointment of an Assistant and Senior Sca Stenographer is the same the Assistant and Senior Sca
60	Senior Scale Stenographer (1988-15)	(i) Bachelor degree or equivalent qualification from a recognized university, and	21 to 32	(a) Eighty per cent by promotion, on the hardens
		(ii) A speed of 100 words per minute in short hand in English and forty words in typing.	years	least five years service, as such and
ð1 <sup></sup> i	<sup>†</sup> Assistant	Bachelor Degree from a recognized University		(0) I wenty per cent by initial recruitment
_	(BPS-14)	a -go - a wood a recognized officersity	21 to 32 years	(a) 75% by promotion on the basis seniority-cum-fitness amongst the Senior Clerk with at least five years service at such, and
62	Junior Scale Stenographer (BPS-12)	(i) Intermediate or equivalent qualification from a	18 to 23	(b) 25% by initial recruitment
	(565-12)	recognized Board, and  (ii) A speed of 80 words per minute in shorthand in English 35 words per minute in typing	years	By initial recruitment
62	Computer Operator/Data Entry Operator/Key Punch	(i) Intermediate with Statics as one of the subject from a	18 to 28	
-	Operator (8PS-12)	recognized board; and (ii) A minimum speed of 10,000 key depressions per hour for punching / data entry verification	years	By initial recruitment
	Santor Clark			
!	(60/2/13)		,	By promotion, on the basis of seniority-jum-fitness, from amounts the Jumpir Clarks with at least five years service as buth
	ATTEST			A time service as addition



### 87 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016.

65)	Junior Clerk (BPS-07)	(i) Secondary School Certificate or equivalent qualification	18 to 28	(a) Thirty-three per cent by promotion, from amongst BPS-0
	(85-3-07)	from a recognized Board; and (ii) A speed of 30 words per minute in typing.	years	from recognized Board and have at least two years serves such; and
				(b) Sixty-seven per cent by initial recruitment.  Note: A candidate passing the examination earlier shall researched that if the candidates passing the examination lateral control of the candidates.
<i>C C</i>				provided that if two or more candidates have passed said examination in the same session, the candidate olde age shall rank senior to the younger candidates
66.	Crewman (BPS-05)	Secondary School Certificate with science, from a recognized Board, and     Mine Sardar Certificate granted under the Coal Mines	18 to 30 years	By initial recruitment
		Regulation, 1926  Note: Preference shall be given to the candidate, having experience in rescue and recovery, as rescue apprentice.		
67.	Tube-well Operator	at any recognized Mines Rescue and Safety Station.  Secondary School Certificate from a recognized Board.	18 to 30	By initial recruitment
	(BPS-05)	Note: Preference shall be given to the candidate having some experience, in Tuberwell Operations.	years	by fillual recruitment.
58.	Driver (BPS-04)	(i) Literate; and (ii) In possession of a valid HTV/LTV Driving License with five years practical experience.	18 to 32 years	By initial recruitment.
9	, Daftari (BPS-02)	Middle passed	18 to 28 years	(a) Fifty per cent by promotion, on the basis of seniority-cutiness from amongst the Naib Qasid; and (b) fifty per cent by initial recruitment.
	Naio Oasid (BPS-01)	- <del></del>	18 to 28 years	By initial recruitment.
	Chowkidar (BPS-01)		18 to 28 years	By initial recruitment.
	Mali (BPS-01)	Gardening experience	18 to 30 · years	By initial recruitment.

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## KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24<sup>th</sup> NOVEMBER, 2016. 88

73 Sweeper				EMBER, 2010. 88	_(,
(BPS-01)		19	18 to 23		
	<u> </u>	n i <del>gr</del> e	years	By initial recruitment	
			753.5	<u> </u>	

# SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA MINERALS DEVELOPMENT DEPARTMENT

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



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			No. of the last of		Cell with at least twelve (12) years service as such in BPS-18 and above or seventeen (17) years service as such in BPS-17 and above with successful completion of Senior Management Course (SMC)
	•				Provided that if no suitable person is available fo promotion then by transfer
					Note: A joint seniority list of Deputy Chief Inspectors of Mines Directors Training and Directors Planning and Mine Development Cell shall be maintained for the purpose of promotion
2.	Deput Chief Inspector of Mines (BPS-19)				By promotion on the basis of seniority-cum-fitness, from amongst the Senior Inspectors of Mines and Rescui Superintendents with at least seven (U/) years service a such in BPS-18 or twelve (12) years service as such in BPS-17 and above:
					Provided that if no suitable person is available for promotion then by transfer.
					Note: A joint seniority list of Senior Inspectors of Mines and Rescue Superintendents shall be maintained for the purpose of promotion.
3.	Director Training (BPS-19)				By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Inspectors of Mines and Rescue Superintendents with at least seven (07) years service as such in BPS-18 or twelve (12) years service in BPS-17 and above.
		<u></u>		,	





25/6/2018



				Provided that if no suitable person is available for promotion then by transfer.
				Note: A joint seniority list of Senior Inspectors of Mine and Rescue Superintendents shall be maintained for the purpose of promotion.
4.	Director Planning and Mine Development Cell (BPS-19)			By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Inspectors of Mines and Rescu Superintendents with at least seven (07) years service as such in BPS-18 or twelve (12) years service as such in BPS-17 and above.
				Provided that if no suitable person is available to promotion then by transfer.  Note: A joint senionty list of Senior Inspectors of Mine and Rescue Superintendents shall be maintained for the purpose of promotion
	Senior Inspector of Mines (BPS-18)	<ul> <li>(i) At least Second Class Bachelor's Degree in Mining Engineering from a recognized University;</li> <li>(ii) First Class Mine Manager Certificate of Competency granted under the provision of Mines Act 1923; and</li> <li>(iii) At least seven years experience in mining.</li> </ul>	28 to 40 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the Inspectors of Mines and Instructors with at least five years services as such and having First Class Mine Manager Certificate of Competency granted under the provision of Mines Act 1923:  Provided that if no suitable person is available for promotion then by transfer or initial recruitment.  Note: A joint seniority list of Inspectors of Mines and Instructors shall be maintained for the purpose of promotion.



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6	Rescue Superintendent (BPS-18)	<ul> <li>(i) At least Second Class Bachelor's Degree in Mining Engineering from a recognized University;</li> <li>(ii) First Class Mine Manager Certificate of Competency granted under the provision of the Mines Act 1923, and</li> <li>(iii) At least seven year; experience in mining.</li> </ul>	78 to 40 vears	By promotion on the basis of seniority-cum-fitness, from amongst the Instructors and Inspectors of Mines with at least five year, services as such and having First Class Mine Manager Certificate of Competency granted under the provision of the Mines Act 1923  Provided that if no suitable person is available for promotion then by transfer or initial recruitment.  Note: A J int seniority list of In pectors of Mines and Instructors half be maintained for the purpose of promotion
7.	Inspector of Mines (BPS 17)	At least Second Cla Bachelor's Degree in Mining Engineering from a recognized University.	21-to 25 years	By initial regulament
8.	Instructor (BPS-17)	At least Second Class Bachelor's Degree in Mining Engineering from a recognized University	21 to 35 years	(a) Fifty percent (50%) by promotion, on the basis of seniority-cum-fitness, from amongst the Rescue Supervisors having at least three years services as such; and  (b) Fifty percent (50%) by initial recruitment
9.	Assistant Director (Admin) (BPS-17)	At least Second Class Master's Degree in Business Administration. Public Administration. Commerce or Bachelor of Studies (4 years), Bachelor of Business Administration (Honrs) or equivalent qualification from a recognized University.	21 to 35 years	By initial recruitment.
10.	Assistant Director (Budget & Account) (BPS-17)	At least Second Class Master's Degree in Master of Business Administration(Finance). Master of Commerce or equivalent qualification from a recognized University.	21 to 35 years.	By initial recruitment





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### KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th JUNE, 2018

11	Statistical Officer (BPS 17)	At least Second Class Master's Degree in Statistics. Economics, Mathematics or equivalent qualification from a recognized University	21 10 35 years	By initial recruitment
12.	Superintendent (BPS-17)			By promotion, on the basis of seniority-cum-litness, from amongst the Assistants and Senior Scale Stenographers with at least five years services as such  Note: A joint seniority of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion to the post of Superintendent  Provided that when the date of continuous
				appointment of an Assistant and Senior Scale Stenographer is the same, the Assistant shall be deemed to be rank senior to the Senior Scale Stenographer.
13	Rescue Apparatus Technician (BPS-16)	At least Second Class three years Diploma in Mechanical Technology from a recognized Board of Technical Education with two years experience as such.	21 to 32 years.	By initial recruitment
14.	Rescue Supervisor (BPS-16)	At least Second Class Bachelor's Degree in Mining Engineering from a recognized University.	22 to 32 years.	By initial recruitment
15.	Secretary Mines (BPS-16)	<del></del>	*****	By promotion, on the basis of seniority-cum-fitness, from amongst the Project Mechanics with at least three years service as such
16.	Senior Scale Stenographer (BPS-16)	(i) At least Second Class Bachelor's Degree or equivalent qualification from a recognized University;	21 to 32 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers with at least five year service as such:



		(ii) a speed of seventy (70) words per minute in shorthand in English and forty five (45) words per minute in typing; and (iii) Knowledge of computer in using MS Word, MS Excel.		Provided that if no suitable person is available for promotion then by initial recruitment.
17	Assistant (BPS-16)	At least Second Class Bachelor's Degree from a recognized University.	20 to 32 years.	(a) Seventy five percent (75%) by promotion, on the bar is of seniority cum-fitness, from amongst the Senior Clerks with at least five years service as J a r Clerk and Senior Clerk.  Provided that if no suitable person is available for promotion then by initial recruitment, and  (b) Twenty five percent (2.00) by initial recruitment.
18	Camputer Operator (BPS 16)	(i) At least acoud Class Bachelor's Degree in Computer Science, Information Technology Bachelor's of Computer Science (BCS) (4 years). Bachelor's of Information Technology (BIT) (04 years) or equivalent qualification from a recognized University, or	18 to 32 years	By initial recruitment.
		) at least Second Clas Bachelor's Detree from a reengaized University with one year Diploma in Information Technology filth a recognized Board of Technical Education	-	
19	Project Mechan c (1 PS 1 )	At lea t Second Cla's three years Diploma in Flecturea or Mechanical Engineering fixin a recognized Board of Technical Education with one year experience in the relevant field	. I to ? . car	By initial recruitment

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### KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 251 JUNE, 2018

20	Stenographer (BPS-14)	(i) At least Second Class Intermediate or equivalent qualification from a recognized Board:	18 to 37 years	By initial recruitment
		(ii) a speed of fifty (50) words per numute in shorthand in English and thirty five (35)words per minute in typing, and		
		(iii) knowledge of computer in using MS Word MS Excel.		
21.	Senior Clerk (BPS-14)			By promotion, on the basis of sentority-cum-fitness from amongst the Juntor Clerks with at least two years service as such
22.	Medical Technician (BPS-12)	(i) At least Second Class Secondary School Certificate with Science from a recognized Board;  (ii) Certificate of Medical Technician from a recognized medical faculty; and	21 to 32 years	By initial recruitment.
23.	Surveyor (BPS-12)	(iii) Two years experience in the relevant field.  At least Second Class Diploma of Associate Engineering in Civil Technology from a recognized Board of Technical Education	18 to 30 years	By initial recruitment
24.	Junior Clerk (BPS-11)	(i) At least Second Class Secondary School-Certificate or equivalent qualification from a recognized Board; and  (ii) A speed of thirty (30) words per minute in typing.	18 to 32 years.	(a) Thirty three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Daftaris, Qasids, Naib Qasids and holders of other equivalent posts with two years service as such and who have Second Class Secondary School Certificate from a recognized Board; and



	. 2			
				(b) Sixty seven (67%) percent by initial recruitment
		ь		Note: For the purpose of promotion, a joint seniority list of Datiaris, Qasids. Nath Qasids and holders of other equivalent posts shall be maintained with reference to the dates of their acquiring the Secondary School Certificate:
			·	Provided that-
				(a) If two or more officials have acquired the Secondary School Certificate in the same se sion, the inter-seniority in the lower politishall be maintained for the purpose of determining en ority in the higher post, and
	-			(b) Where a Senior Official does not postess the requisite qualification at the time of filling up a vacancy, the official next unior to him possessing the requisite qualification shall be promoted in preference to the enior official or official.
<b>2</b> 5.	Store Keeper (BPS-09)	At least Second Class Secondary School Cenificate or equivalent qualification from a recognized Board with one year experience as Store Keeper	18 to 30 years	By initial recruitment
26.	Crew-Man (BPS-07)	(i) At least Second Class Secondary School Certificate with Science from a recognized Board, and	18 to 30 years	By initial recruitment
		(ii) Mine Sirdar's Certificate granted under the Coal Mine Regulation, 1926:		







		·		
	-	Provided that preference shall be given to the candidate, having experience in rescue and recovery as rescue apprentice at any recognized Mines Rescue and Safety Station.		
27	Tube-Well Operator (BPS-6)	At least Second Class Secondary School Certificate from a recognized Board  Note:Preference shall be given to the candidate, having some experience in Tube-well operations.	18 to 40 years	By mitial recruitment
28,	Driver (BPS-06)	(i) Literate; and  (ii) having a valid HTV/LTV Driving License issued by competent authority provided that preference will be given to those who have sufficient experience in driving repairing and maintenance of vehicle.	18 to 40 years	By initial recruitment.
29.	Dafiri (BPS-04)			By promotion, on the basis of seniority-cum-fitness, from amongst the Matriculate Qasids and Naib Qasids with at least three years' service.
30.	Qasid (BPS-04)			By promotion, on the basis of sentority-cum-fitness, from amongst the Naib Qasids.  Note: A Joint sentority list of Naib Qasids of all the regional offices shall be maintained by the Inspectorate of Mines (Admin Section) Headquarters' Office Peshawar.
31.	Naib Qasid (BPS-03)	Literate.	18 to 40 years.	By initial recruitment

KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th JUNE, 2018



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32	Mines Guard (BPS 03)	At least Second Class Secondary Share Certificate from a recognized Board	18( 4)	By united recomment
31	Farash (BPS 07	Preferably I nerate	18.1 -40 years	By initial recruitment
34	Attendani (BPS 03)	Preferably Lite	18 to 40 years	By mittal recomment
35	Dak Runner (BPS-03)	Preferably Liter 19	18 to 40 Years	By initial recruitment
36	Chowkidar (BPS-03)	Literate with sound physique	18 to 40 years	By initial recruitment
۱7 .	Malı (BPS-03)	Literate and two years working experience of Mah	18 to 40 years.	By initial tecru timent
38	Sweeper (BPS-03)	Pre rably Literate	IR to 40 years	By initial recontinent
39	Cook (BPS-03)	Literate with three years practical Experience in	18 to 40	By dial recruit of

Note: The phrase "by transfer" appearing in these service rules shall mean transfer for the posting purpose in jursuance of section 10 of the Klauber run. Jikhwo Civil Servants Act. 1973 (Act No. XVIII of 1973) and shall no voit a right of appointment or absorption or promotion against the post on regular has:

SECRETARY TO GOVERN' LENT OF THE KHYBER PAKHTUNKHWA MIN ZRALS DEVELOPMENT DEPARTMENT.

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### TENTATIVE SENIORITY LIST OF THE ASSISTANTS/SENIOR SCALE STENOGRAPHER (BPS-16) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Assistant

**≖ 20** 

Senior Scale Stenographer (BPS-16) = 1

Sr.	Vacant = 13  Name of Officer/Olicial	Date of Birth	Date of 1st entry into	Regulai	appointme to the prese	ent/promotion nt post	Present oppointment	Remarks
No.	with Academic Qualification	with Domicile	Government Service	Date	BPS	Melhod of Rectl:/Applt:	with date	9.
		3	4	5	6	7	8	<u>                                     </u>
	2	12,04,1962	20 10 1982	11.01.1994	16	By promotion	11.01.1994	
<b>√</b>	Mr. Fazli Malik Assistant (Matric)	Mardan			16	By initia	23.07.1995	
2	Mr. Muhammad Ishaq	01.08.1972 Karak	23.07.1995	23.07.1995	10		•	
	Assistant (M Å)	01.03.1961	25.07.1996	25.07.1996	16	·	25.07 1996	
- 3	3 Na. Mehammad Zubair (1995) Assistant (B.A)	Mansehra			•	By promotion	17.05 2010	
4	Mr. Muhammad Riaz	15.05.1970 Mardan	06.06.1988	17.05.2010	16	by pictrionary		•
٠,	Assistant (F.A)		16.11.1982	16.04.2012	16		16.04.2012	
5	Mr. Rahatullah Sr. Scale Stenographer	13.09.1964 Peshawar				-		
	(Matric)	<b>v</b>			.,	., - ·	01.06,2012	
. 6	Mr. Ishliaq Ahmed	20.12.1959	01.12.1987	01.06.2012	16			
T-223 <i>8</i> 94	Assistant (Matric)	Peshawar	25.08.1991	10.11.2017	16		10.11.2017	
i sili,	Mr. Farooq Shah F.A.	06.01.1970 Peshawar	20,002,771			سوادر حد	16.11.2017	
8	Mr. Mohammad Ghayas B.A.	01.10.1968 Khyber Agency	01.03.1995	10.11.2017	16	•	10.11.2017	



## TENTATIVE SENIORITY LIST OF THE JUNIOR CLERKS (BPS-11) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31,12,2017

Total sanction posts = 22
Vacant = 34

Şr. No.	}	Date of Birth with Domicile	Date of 1st entry into Government			ment/promotion sent post	Present appointment with date	Remarks
	Qualification		Service	Dale	BPS	Method of Rectl:/Apptl:		
<u></u>	2	3	4	5	. 6	7	8	9
	Mr. Mohd. Naeem Farooq F.A.	01 04/1962 D I.Khan	01.07.1987	01.11.2002	11	By adjustment	01.11 2002	<u> </u>
<b>√</b> 2	Mr. Waqas Ali Shah F.A.	10.08 1988 Swabi	03.06.2010	03.06.2010	11	By initial	03.06.2010	
_3	Mr. Adnan Rashid Matric	- <u>22.03.1984</u> Haripur	23.05.2008	03.04.2010	181 <sub>-</sub> 1	, <u>, , , , , , , , , , , , , , , , , , </u>	03.06.2010	
4	Mr. Muhamamd Fayyaz Matric	20.12.1972 Peshawar	17.07.1994	30.06.2011	11	By Promotion	30.06.2011	-
5	Syed Baghi Shah Malric	01.01.1972 Buner	18.08.1993	01.07.2011	11	By promotion	01.07.2011	
· 6	Mr. Asil Ali Khan D.Com.	03.04.1990 Bannu	25.02.2012	25.02.2012	11	By initial	25.02.2012	
7	Mr. Islam Pervez B.A.	01.G3.1974 Dir	28.02.2012	28.02.2012	11		28.02.2012	,
8	Muhammad Nasar F.A.	10.04.1976 Swat	13.04.2007	07.01.2014	11	By promotion	07.01.2014	







	اتم Musicia -	10 11 1000	•	,			
	ВА	. 10 11.1988 Mohmand Agency	(4) (2017	15 12 2017		By initial	15 12 2017
] <u> </u>	Haroon Rasheed B A	05 01 1995 Nowshera	15.12.2017	15.12.2017	-	<sup>*</sup> By initial	15 12 2017
	Wajed ur Rahman B A	15.05.1995 North Waziristan Agency	15.12.2017	15.12.2017	į į	By initial	15.12 2017
12	Waqas Bilal BS (Hons)	14.08.1994 Bannu	18 12.2017	18 12 2017	ti <sub>j</sub> ,	By initial	18 12 2017
13	Affan MBA	18 04 1984 Karak	20.12.2017	20.12.2017	ť.	By initial	20.12.2017
14	Waleed Ralique BBA (Hans)	17.08.1992 Mansebro	20.12.2017	20.12.2017		By initial	20,12,2017
15	Wajihud Din BS (Software Engineering)	27.02.1993 Malakand	21.12.2017	21.12.2017	11.	By initial	21.12.2017
16	Muhammad Afzaal MBA	23.11.1986 Abboltabad	26.12.2017	26.12.2017	• • • • • • • • • • • • • • • • • • •	By initial	26.12.2017



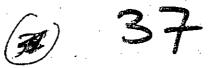
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## TENTATIVE SENIORITY LIST OF THE DRIVERS OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

		Vacant = 15	•			·		· · · · · · · · · · · · · · · · · · ·
Sr.	Total sanction posts = 25  Name of Officer/Oficial	Date of Birth with Domicile	Date of 1st entry into Government	Regular	appointm o the pres	nent/promotion ent post	Present appointment	Remarks
No.	with Academic Qualification	with Academic Will Dollines	Service	Date	8PS	Method of Recit:/Appli:	with date	
	<u>/                                      </u>	3	4	5	6	7	8 .	9
1/	Mr. Fazole Azim	01.05.1965	12.10.1992	14.09.1993	6	By initial	14 09.1993	·
	D.Com	Mardan	01.12.1992	14,09.1993	6		14.09.1993	
2	Muhammad Rafiq	Abballabad			4	· ·	14.09.1993	
3	Mr. Ghunchak	01.07.1967 Swat	01.12.1992	14.09 1993				
<b>4</b>	Mr. Abdul Salarii	Peshawar	07.04 1993	14.09 1993	. 6		14 09 1993	. • • .
5	Mr. Naik Zada	01 07.1968 Swal	21.10.1993	03.04 1995	. 6	u	03.04.1995	
6	Mr. Zameer Hussain	01.07.1968 D.I.Khan	27.09.1995	27 09.1995	6	•	27 09.1995	
7	Muhamamd Wisal	14.08.1966	21 10.1996	21.10.1996	6	«·	21.10.1996	
8	Mr. Muhammad Ali	Peshawar 24.04.1974	31.12.2008	31.12.2008	. 6		31 12.2008	• •
	B.A.	Charsadda	21.11.2011	21.11.2011	6	н	21.11.2011	~
۶ .	Muhammad Atif Afrida F.A.	Peshawar		01.11.0011			21.11.2011	
10	Mr. Wakil Khan Malric	14.11.1980 Nowshera	21.11.2011	21.11.2011	6	•		



### TENTATIVE SENIORITY LIST OF THE NAIB QASIDS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Total sanction pasts = 17 Vacant = 2

r. o.	Name of Officer/Oficial with Academic	Date of Birth with Damicile	Date of 1st entry into Government	} -	appointn o the pres	nent/promotion ent post	Present appointment	Remarks
	Qualification		Service	Date	Date BPS		with date	in and its
1	2	3	4	5	6	7	8	9
• 1	Mr. Azım Khan	01.07.1960 Peshawar	19.06.1989	14 08.1990	4	By initial	4.08.1990	•
2	Mr. Jehanzeb Khan-l	01.07.1966 Peshawar	19.08.1990	19.08.1990	4.	By Initial	19.08 1990	
3.	Mr. Ábdul Wadaad Malric	;		14.07.1973	4	entert By Initial Line	14:07.1593	
4	Mr. Muhammad Zulfiqar	01.07.1973 D.I.Khan	17.09.1995	17.09.1995	4	By Initial	17.09.1995	
. 5	Mr. Khan Muhammad Matric	05.05.1974 Swal	20.08.1995	13.12 2005	4	By Initial	13.12.2005	
. \$	Mr. Rashid Khan Matric	30.01.1974 Nowshera	29.12 2008	29.12.2008	3	By Initial	29.12.2008	
	Mr. Muhammad Bashir Matric	05.04.1988 Nowshera	31.12.2008	31.12.2008	3 .	By Initial	31.12.2008	
	Mr. Yousaf Khan-II	01.07.1964 Peshawar	24.11.1996	25.03 2010	<b>3</b>	<ul> <li>By Initial</li> </ul>	25.03.2010	
9	Mr. Jehanzeb-II Middle	12.03.1985 Peshawar	19.11.2011	19.11.2011	3	By Initial	19.11.2011	







	- v (Official	Date of Birth		Regular o Io	the prese		Present appainiment	Remarks
1.	Name of Officer/Oficial with Academic	with Domicile	Government Service	Date	8PS	Method of Rectt:/Apptt:	with date	9
. }	Qualification		4	5	. 6	-7	8	<u></u>
1	2	3	01.07.2012	01.07.2012	3 ,	By Initial	01 07.2012	
2	Mr Shahab Ali B.A	13 03.1990 Swabi		<u>.</u>		By Initial	08 01.2013	
, .	Mr Muhammad Shoaib	15.04.1989	08 01.2013	08.01.2013	3	by minor	•	
,	Matric	Mardan 30 05.1987	1401 5753	14.01.2013	3	By In tial	14.01.2013	•
12	Syed Mustafa 7th Class	Buner	01.07.2014	01.07.2014	3	By Init.⊕	01.07.2014	
113	Muhanimad Shakeel-vr-Rahamn M.Sc (Economics)	30.06.1989 Khyber Agency	, ; ; <u>;</u> ;			By Initial	29.10.2014	• . • • • •
	Mr. Najeeb ur-Rahman	01.01.1987	29.10.2014	29,10,2014	3	By Runor		
17		Peshawar 19.04,1981	17.08.2010	17.08.2010	3	By Initial	19.08.2015	Cadre change 19.08.2015
15	Mr. Sojid Khan Middle	Peshawar						





## TENTATIVE SENIORITY LIST OF NAIB QASID/CHOWKIDAR/SWEEPER/MALI ETC(WHO HAVE PASSED MATRIC) WORKING IN INSPECTORATE OF MINES KYBER PAKHTUNKHWA AS SOOD ON 31.12.2017

	Management from the contract of the second temperature and temperature and temperature and temperature	the grown named as an income was a	TOTAL STREET,					•	•
Sr. No		Designation	Date of Birth	Domicile	Gualification	Date of 1st entry into Government Service	Date of entry into present post	Year of passing Mairic Exam	Remarks
***************************************	And a second control of the second se	a farran a made an a signa	J	<u>\$</u>		7	8	managan aya da bada da j	A CONTRACTOR OF THE PROPERTY O
, , ,	Mr. Abdul Wadood	Noib Qosid	11 04 1975	Karak	Mairic	14.09 1993	14.09 1993	04 08 :494	ME and the law recommender to be also take the second of t
2	Mr. Muhammad Adalat	Chowkidar	04.01 1962	Mansehra	Motric	31.08.1995	31 08.1995	07.08 1978	*· ·
3	Mr. Khan Muhammad	Naib Qasid	05 05.1974	Swal	Mainc	20.08 179 7	13.12.2005	15.06 2015	Cader change (%, 13 for 2005
4	Mr Shoaib Ali	Malı	05.03.1980	Peshawar	Mainc	26 12 2008	36.12.3008	24.12 1997	Oddej Crid #42 /#1 - 3 17 2005
	Mr Rashid Khan	Naib Qasid	30 01 1974	Nowshera	Matric	29.12 2008	.9.12.2008	25.07.1992	
ر	Mr. Muhammad Bashir	Naib Gasid	05 05.1988	Nawshera	Matric	31.12.2008	31.12.2008	6.06.2010	
	Mr Shohab Ali	Naib Gosid	13 03 1990	Swabi	BA.	01.07.2012	01.07.2012	24.06.2006	
	Mr. Mulioniniad Shoolo	Naib Qasid	15 04,1989	Mardan	Matric	08 01.2013	08 01.2013	20.10.2006	
10	Mr. Jamshed Ali	Chowkidar	16.06 1979	Swat	Malric	10.01,2013	09.09 2015	20.06.2016	Cader change on 09.09.2015
	Mr. Anwar Chund	Sweeper	04 08 1990	Kohal	B.A.	14 01 2013	14.01.2013	30.06.2006	
11	Mr. Ageel Samso I	Sweeper	08 04 1990	Peshawar	F.A	26 06 2013	26 06 2013	10.08.2007	
12	Muhammad Shokeel-ur-Rehman	Naib Qasid	30.06 1989	Khyber Agency	M.Sc.	01.07.2014	01 07.2014	30.06.2006	
13	Harcon Badshah	Chowkidar	03.09 1979	Karak	Matric	25.05 2017	25 05 2017	1996	

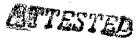




## TENTATIVE SENIORITY LIST OF NAIB QASID/CHOWKIDAR/SWEEPER/MALI ETC(WHO HAVE PASSED MATRIC) WORKING IN INSPECTORATE OF MINES KYBER PAKHTUNKHWA AS SOOD ON 31,12,2017

	<del></del>			•			<u> </u>		
Sr. No.	Name 2	Designation	Ďate of Birth	Domícile	Qualification	Government	Date at entry into present post	Year of passing Matric Exam	Remarks
		3	. 4	5	6	\$ervice	<del></del>		
1	Mr. Abdul Wadocd	Naib Qasid	11.04.1975	Karak	Malris	14.09.1993	. 8	9	10
2	Mr. Muhammad Adalat	Chowkidar	04.01.1962	Mansehra			14.09 1993	04:08 1994	
3	Mr. Khan Muhammad	No b Qasid	•	MOUSENIA	Malric	31.08,1995	31.08.1995	07.08.1978	
4	Mr. Shoalb Ali	110 0 0030	05 05 1974	\$wat	Matric	20.08,1995	13.12.2005	15.06,2015	
		Mal	05 03 1980	Peshawar	Matric	26.12.2008			Cader change on 13,12,2005
5	Mr. Rashid Khan	N≈b Qaid	39 01 1974	Nowshero	Motric		26.12.2008	24.12.1997	•
á	Mr. Muhammad Bashir	Naib Qasid	OS 05 1988			29.12.2008	29.12.2008	25.07,1992	• .
7	Mr Shahab Al			Nowshera	Matric	31,12,2008	31.12.2008	16.06.2010	
8	Mr. Muhammad Shoaib	Naib Qas d	13 03 1990	Swabi	B.A.	01.07.2012	01.07.2012	24.06.2006	•
Īœ		To Neib Cond in.	15054.1989	กังเลาซื้อก็	Marric	08.01.2013			:
9	Mr. Jamshed Ali	Chowkidar	16.06 1979	Swal			08.01.2013	20.10.2006	
0	Mr. Anwar Chund	Sweeper	04.08 1990		Matric	10.01.2013	09.09.2015	20.06.2016	Cader change on 09 09 2015
3	Mr. Aqeel Samsoil	-		Kohat	9.A.	14.01.2013	14.01.2013	30.06.2006	30 01.07 07 2013
		Sweeper	08.04 1990	Peshawar .	f.A	26.06.2013	26.06.2013		•
•	Muhammad Shakeet-ur-Rehman	Naib Qosid	30.04 1989	Khyber Agency	M.Sc.			10.08.2007	
3	Haraon Badshah	<b>C</b> t		ş. <b>3-,</b>		01.07.2014	01.07.2014	30.06.2006	
		Chowkidar	03.09,1979	Karak	Matric	25.05.2017	25.05.2017	1996	

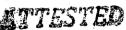




## TENTATIVE SENIORITY LIST OF THE CHOWKIDARS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Total sanction posts 9 Vacant 2

	Sr. No.	Name of Officer/Oficial with Academic Qualification	Date of Birth with Domicite	Date of 1st entry into Government Service		r appointm to the pres	ent/promotion ent post	Present appointment	Remarks
			WIII DUTTICITE		Date	BPS	Method of Rectt:/Applt:	wilh date	
-		· 2	3	4	5	6	. 7	8	9
()	1 /	Muhammad Adalat Matric	04.01.1962 - Mansehra	31.08 1995	31,08,1995	3	By Initial	31.08.1995	
¥	2	Muhammad Qaisar	05.04.1977	02.04.2001	01.02.2002	3	By Initial	01.02.2002	es e
_ 3_ '	3	Mr. Mohi Room	01.07.1982 Buner	12.04.2004	23.07.2005	3	By Initial	23.07.2005	, j.
	4	Muhammad Rafiullah Khan	01.04.1965 D.I.Khan	01.11.2007	01.]1.2007	3	By Initial	01.11.2007	
D	5	Mr. Shad Munammad	1977 Nowshera	29.12.2008	29.12.2008	3 .	By Initial	29.12.2008	
	6	Mr. Sajid Muhammad	11.10.1984 Nowshera	29.12.2003	29.12.2008	3	By Initial	29.12.2008	
	7	 Mr. Jamshed Ali	16.06.1979	10.01.2013	10.01.2013	3	By Initial	09.09.2015	Cadre change 09.09.2015
•	8	Matric Haroon Badshah	Swa1 03.09.1979	25.05.2017	25.05.2017	3	By Initial	25.05.2017	-
		Matric	Karok	•	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			-	



L ouis a Oficial	Date of Birth	Date of 1st entry into	Regular appointment/promotion to the present post			Present appointment	Remarks	
Name of Officer/Oficial with Academic	with Domicile	Government Service	Date	BPS	Method of Rectt:/Apptt:	with date	:	
Qualification			<u> </u>		7	6	9	
	3	4	5					
2	13 03 1990	01 07 2012	01 07.2012	3	By Initial	01 07 2012		
Mr. Shahab Ali	Swabi			•	•	·		
B.A	15.04.1989	08.01.2013	08.01.2013	3	By Initial -	08 01.2013	<b>.</b>	
Mr. Muhammad Shoaib	Mardan	•	•			*,		
Mainc	30.05.198/	14.01 2013	14.01,2013	3	By Initial	14.01 2013		
Syed Mustafa 7th Class	<sub>e</sub> Buner	01.07.2014	01.07 2014	3	By Initial	01.07.2014		
Muhammad Shakeel-ur Raham M.Sc (Economics)	nn 30,06,1989 Khyber Agency	() () () () () () () () () () () () () (	·			27, (0.2014		
W.SC (ECOHOLING)	·	29.10.2014	29.10.2014	3	By Initial	27,10.201		
Mr. Najeeb-ur Rahman	01.01.198 <b>7</b> Peshawar	2,,10,00		•	- 4 35-1	19 08.2015	Cadre change	
5 Mr. Sajid Khan	19.04.1781 Peshawar	17.08.2010	17,08 2010	3	By Initial	17 00.2010	19.08.2015	





Middle

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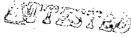
44

## TENTATIVE SENIORITY LIST OF THE SWEEPER (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Sweeper = 5 Vacant = 1

	Name of Officer/Oficial	Date of Birth	Date of 1st entry into Government		o lhe prese	ent/promotion ent post	Present appointment	Remarks
О.	with Academic Qualification	with Domicile	Service	Date	BPS	Method of Recit:/Appti:	with date	
			4	5	6	7		<u> </u>
	2	01.01.1991	17.8.2010	17.8.2010	3	By Initial	17.8.2010	
1	Mr Hazrat Usman	Nowshera	14,01.2013	14.1.2013	3	By Initial	14,1,2013	
2	Mr. Arwan Chund B.A.	04.08.1990 Kohal				By Initiat	26.06.2013	<u></u>
3	Mr. Aqeel Samsoil	08.04.1990 Peshawar	26.06.2013	26.06.2013	3	ву пиаси	20.50/2010	
4	Mr. Sagar	01.01.1989 Mardan	08.01.2013	8.1.2013	3	By Initial	8.1.2013	







### ENTATIVE SENIORITY LIST OF THE JUNIOR CLERKS (BPS-11) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31,12,2018

Total sanction posts

24

Vacant

3

Sr.	Name of Officer/Official with Academic	Date of 31th	1 ' 1	to	ppointmer The present	nt/promotion t post	Present appointment	Remarks
1 Bill B A B A B B B A B B B A B B B A B B B A B B B B A B B B B B A B	Qualification		Service	Daie	875	Method of Rectt:/Apptt	with data	
1	2	3	4	5	6	7	8	9
1 .	Bilal Mustala B A	10.11.1988 Mohmand Agen	15,12,2017 Cy	15.12 2017	11	By init a	<b>15.12.2</b> 337	· .
.2	Haroon Rasheed B.A	05.01.1995 Nowshera	15.12 2017	15.12 2017	11 .	By initial	15.12 <b>2</b> 717	· · .
3	Wajed ur Rahman B.A	15.05.1995 NW Agency	15.12.2017	15.12.2017	11	. By initial	15 12 2017	
4	Waqas Bilal BS (Hons)	14 08,1994 .Bannu	18.12 2017	18 12 2017	11	By initia	18 10 2017	
5	Affan MBA	18.04.1986 Karak	20.12 2017	20.12.2017	11	By initial	20 12 2017	
6	Waleed Rafique BBA (Hons)	17.08.1992 Mansehra	20.12.2017	20,12,2017	Н,	By initial	20 12 2017	
7	Muhammad Atzeal MBA	23.11.1986 Abbollabad	26.12 2017	26.12.2017	11	By initial	26 12 2017	
8	Mr. Sohail Ahamd	24.04.1988 Nowshera	07,03.2018	07.03.2018	11.		07.03 2018	•





			,				
9	Mr Muhammad Taligaer	©2 03 1989	07.03.2018	07.03.2018	[1		07 03 2018
. 10	F.A Mr. Abdul Wadood	Nowshera 11 04:1975	14,09, 1993	01.10.2018	ij.	By Promotion	01 10 2018
11	Matric Mr Shoaib Ali	Karak 05 03 1980	26 12 2008	01.10.2018	11	-	01 10.2018
12	Matric Mr. Rashid Khan	Peshawar 30 01 1974	29 12 2008	29.12.2008	11		01 10-2018
13	Matric Mr. Muhammad Bashir	Nowshera 05.04.1988	31.12 2008	01.10.2018	н		01.10.2018
14,	Malric Mr Shahab Ali	Nowshera 13 03 1990	01.07.2012	01,10,2018	11		01.10.2018
15	Mr. Arwan Chund	Swab 04.08.1990	14.01 2013	01.10.2018	11		01.10.2018
16	B.A. Mr.: hah Fahad	Kohat 21 02   772	01.10.2018	01.10.2018	11	By Initial	01.10.2018
17	M.Sc Computer Science Mr. Saeed Ullah	Peshawar 15.02 1996	01.10.2018	01.10.2018	11	.,	01 10.2018
12-	B.A . Mr. Muhammad Zebair : -	FR Bannu 11,03 1995	02 10,2018	02.10.2018	11		02.10.2018
19	M.Com Mr. Murad Ahmad Shah	Peshawar 01.12.1997	02.10.2018	02.10.2018	11	,,	02.10.2018
. 20	B.com M. Shakee -ur-Rahamn	Batagram 30.06.1989	01 07.2014	01.12.2018	Ħ	By Pramation	01.12.2018
21	M Sc (Economics) Mr. Khan Muhammad	Khyber Agency 05.05.1974	20 08 1995	01.12.2018	11	By Promotion	01.12.2018



Matric

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### TENTATIVE SENIORITY LIST OF THE SENIOR CLERKS (BPS-14) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts
Vacant

Sr. No.	Name of Officer/Oficial with Academic	Dale of Birth with Domicile	Date of 1st entry into Government		the presen	nt/promotion it post	Present appointment	Remarks
	Qualification		Service	Date	BPS	Method of Rectt:/Apptt:	with date	
<u> </u>	2	3	4	5	6	7	8	. 9
1	Mohd Naeem Faroog	01.04/1962 D I:Khan	01 07,1987	01.01.2018	14	By Promotion	01.01 2018	
: I	S.F.A.	U JARIOH		- *	•	<b>a</b> .		
$\sqrt{2}$	Mr. Waqas Ali Shah F.A.	. 10 08 1988 Swabi	03.06.2010	01.01.2018	14	**	01.01.2018	
3	-Mr. Adnan Rashid	22.03.1984	23.05.2008	03,04,2010	14		02-01-2018	
•	Matric	Haripur	•	<b>*</b>				•
4	Muhamamd Fayyaz	20.12.1972	17.07,1994	02.01.2018	14	M	02:01.2018	·
	Matric	Peshawar	. <del>-</del>					
5	Syed Baghi Shah Matric	01 01.1972 Buner	18,08,1993	01.01.2018	14		01.01.2018	
6	Mr. Asif Ali Khan D.Com.	03.04.1990 Bannu	25.02.2012	28.05.2018	14	*	28.05.2018	
7	Mr. Islam Pervez B.A.	01.06.1974 Dir	28.02.2012	30.05.2018	14		30.05.2018	·
8	Muhammad Nasar F A	10,04,1976 Swat	13.04.2007	01.10.2018	14		01.10.2018	



Total sanction posts Vacant

Sr No.	Name of Officer/Official with Academic	Date of Birth with Domicite	Date of 1st entry into Government		ppoinimer	nt/promotion t post	Present appointment	Remarks
	Qualification		Service -	Date	BPS	Method of Rectt:/Appti	with date	,
1.	2	3	4	5	4	7	8 .	9
1	Mr. Fazale Azım	01.05.1965 Mardan	12.10 1992	14.09.1993	6	By initial	14.09.1993	
2	D.Com Muhammad Rafq	07.04.1963 Abbollabad	01.12 1992	.14.09.19"3	<b>6</b> .		. 4 (19,1093	
3	Mr. Ghunchak	01.07.1967 Swat	01.12 1992	14.09.1993	<b>é</b>		14 09 1993	
	Mr. Abdul Salam	01.02.1967 Pesnawar	07.04 1993	14.09.1993	· 6		14 09 1993	•
5	Mr. Naik Zada	01.07.1968 Swg1	21.10.1993	03.04.1995	6		03.04.1995	
6	Mr. Zameer Hussain	01.07.1968 D.I.Khan	27.09.1995	27.09.1995	6		27.09 1995	
7	Muhamamd Wisal	14,08,1966 Peshawar	21.10.1996	21.10.1996	٠ 6	<b>.</b>	21,10,1996	
8	Mr. Muhammad Ali 8.A.	24.04.1974 Chasadda	31.12.2008	31.12.2008	6	* <i>e</i>	31.12.2008	
9	Muhammad Alif Afridi F.A.	12.05.1987 Peshawar	21,11,2011	21.11.2011	6		21.11.2011	
10	Mr. Wakil Khan Malric	14.11.1980 Nowshera	21.11.2011	21:11:2011	6		21 11.2011	
1	Mr. Javid Akhtar Matric	03.01.1980 Peshawar	28.12.2017	28.12.2017	6		28.12.2017	
12	Mr. Imran Khan	20.04.1989 Lower Dir	01.01.2018	01.01.2018	6	•	01.01.2018	
	Mr. Saqib Shah Afridi F.A	01.08.1989 Khyber Agency	01.01.2018	01,01.2018	6		01,01,2018	



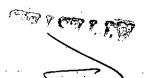
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Total sanction posts

27

Sr.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government	-	he preser	nt/promotion nt post	Present appointment	Remarks
140.	Qualification		Service	Dale	895	Method of Recft:/Apptt.	1	
1	2	3	4	5	é	7	8	9
	Mr. Fazale Azım	01.05 1965	J2 IO 1992	14.09.1993	6	By initial	14.09 1993	
2	D.Com Muhammad Rafiq	Mardan 07.94 1963	01 12:1992	14.09 1993	6		14 09 .1993	
3	Mr. Ghunchak	Abboltabad 01.07.1967	01.12 1992	14.09.1993 .	6	**	1469 1993	
4	Mr. Abdul Salam	Swal 01,02,1967	07.04.1993	14.09.1993	6	· ·	1459.1993	·
5	Mr. Naik Zada	01.07 1968	21.10.1993	03.04.1995	6	W The second sec	03.04.1995	
6	Mr. Zameer Hussain	Swat 01 07 1968	27.09.1995	27.09.1995	. 6	ч	27.09.1995	
7	Muhamamd Wisal	D.I Khan 14 08.1966	21.10.1996	21.10.1996	6		21.10 1996	
8		Peshawar 24.04.1974	31.12.2008	31.12.2008	6	<b>.</b>	31 12 2008	•
9	B.A. Muhammad Atif Afridi	Charsadda 12 05 1987	21.11.2011	21.11.2011	6		21.11 2011	
10	F.A. Mr. Wakil Khan	Peshawar 14.11.1980	21,11,2011	21.11.2011	6	и	21.11 2011	
11	Matric . Mr. Javid Akhlar *	Nowshero 03 01 1980	28.12.2017	28.12.2017	6		28.12.2017	
12	Matric Mr. Imran Khan	Peshawar 20.04,1989	01.01.2018	01.01.2018	6 .	•	01.01.2018	
13	 Mr. Saqib Shah Afridi F.A	Lower Dir 01.08.1989 Khyber Agency	01.01.2018	01.01.2018	6	*	01.01.2018	

KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018





	·.						
14	Mr Zia Ud Din	28 09 1982	02 01.2018	02.01 2018	6		02 01 2018
	Middle	Ch.tral					02.01 2018
15	Mr. Elaz Nase≤m	01.01 1987	02 01.2018	02.01.2018	6		02.01 2018
_	Middle	Karok .	,			•	
16	Mr. Maisam Hussain	24.03.1994	02.01.2018	02,01,2018	6	·	02 01 2018
• • •	Matric	Kuram Agency	-			•	
17	Mr. Abdur Rahim	14.02 1982	03 01.2018	03 01,2018	6		03 01 2018
.,		' Mardan				•	
18	Muhammod Arif Afrid	28.03.1985	03 01 2018	03.01.2018	6	,	03 01 2018
10	Matric	Peshawar					
	Mr. Ahlasham Hafeez	13 03.1985	4,01,2018	4.01.2018	6		4.01.2018
19		Haripur					
	F.A	10 04.1986	04.01 2018	04.01.2018	6	•	04.01.2018
20	Mr. Shah Jahan	D Khan	54.51 25.5	•			
	Malra	15.01.1987	04 01 2018	04 01 2018	6		04,01 2018
21	Muhammas Alfaf Khan		04 01 2010	84012010	•		•
	Matric	Lakki Marwat		05.01.2018	4		05 01,2018
22	Mr. Umer Shozad	19,04,1987	05.01 2018	03.01.2010	·		* *
	F.A	bodoffoddA		04.03.0015			25.01.2018
23	Mr. Nasem Ullah	01.05.1986	26.01.2018	26.01.2018	,,		
	D.Com	Tower Direction		/		•	07.03.2018
24	Mr. Waheed Ur Rehman	19.11.1980	07.03.2018	07.03.2018	6		07.03.2010
	•••	Nowshera					07.03.7010
25	Mr Abid Urah	16.04,1983	07 03 2018	07.03.2018	6		07.03.2018
-	•••	Charsadda					
25	Mr Shafiq &r Rehman	04 08.1986	03 04 2018	03.04 2018	δ .		03.04.2018
	Matric	Kohistan					





1   14	Mr žia Ud Din	28 09 1982	02 01.2018	02 01.2018	6		#2.01 T018
. 14	Middle Middle	Chitral	32 01.2510	02 01.2010	ŭ		
	Mr Ejaz Naseem	01 01 1987	02 01 2018	02.01.2018	. 6		. 02 01.2018
13	Middle	: Karak	32 37 2313	02.07.2010			
. 16	Mr. Maisam Hussain	24 03 1994	02.01.2018	02.01.2018	6		~2.01.2018
	Matric	Kuram Agency					
112/	Mr. Abdur Rohim	14.02.1982	03.01.2018	03.01.2018	6	e -	63 01.2018
		Mardan			•		
18	Muhammad Arif Afridi	28.03.1985	03.01.2018	03.01.2018	6		03.01,2018
	Matric	Peshawar	**				
19	Mr. Ahlasham Haleez	13.03.1985	4.01.2018	4.01.2018	. 6		4.01.2018
	Ė.A	Horipur					
20	Mr. Shah Jahan	10 04,1986	04 01 2018 -	04.01.2018	6		04.01.2018
	Matric	DI Khan	-				
21	Muhammad Alfaf Khan	1501.1987	04 01.2018	04.01.2018	6	*	04 01.2018
	Malric	Lakki Marwat					
. 22	Mr. Umer Shazad	19.04.1987	05 01 2018	05.01.2018	6	•	05.01.2018
	F.A	bodolloddA					•
23	Mr. Nasem Ullah	01.05.1986	26.01.2018	26.01.2018	δ.	*	24.01.2018
د چون در د خونود ما د محمد د دود	LD.Com	- Lower Dir		·		• •	
24	Mr. Waheed Ur Rehman	19.11.1980	07.03 2018	07.03.2018	6		07.03 2018
	****	Nowshera					
25	Mr. Abid Ullah	16.04 1983	07.03 2018	07.03.2018	6	•	07.03 2018
	••••	Charsadda					•
26	Mr. Shafiq Ur Rehman	04.08.1986	03 04.2018	03.04.2018	<b>ن</b> .		03.04.2018
	Matric	Kohistan	•	•			

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### TENTATIVE SENIORITY LIST OF THE NAIB QASIDS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts Vacant 28

Sŗ. No,	Name of Officer/Official	Date of Birth	Date of 1st entry into Government		ppoinimer the presen	nt/promotion I post	Present appointment	
	Qualification		Service .	Date	898	Method of Rectt-/Apptt	with date	1.07
1	2 .	3	4	. 5	6	7	8	9
1	Mr. Azim Khan	01.07.1960	19 06 1989	14.08.1990	4	By Initial	14 08,1990	
2	Mr. Jehanzeb Khan I	Peshawar 01.07 1966	19 08 1990	19.08.1990	4		19.08.1990	
3	Mr. Muhammad Zulfigar	Peshawar 01.07.1973	17.09.1995	17.09.1995	4	· , ·	17 09 1995	-
4	Mr. Yousal Khan-II	D.I.Khan 01.07.1964	24.11.1996	25.03.2010	3		25 03.2010	
. : : 5	Mr. Jehanzeb-II	Peshawar 12.03.1985	. 19.11.2013	19.11.2011	3		19,11.2011	
	Middle Mr. Muhammad Shoaib	Peshawar 15.04.1989	08 01,2013	08.01,2013	3	ø.	08 01.2013	
,	Matric Syed Mustala	Mardan 30.05 1987	14 01.2013	14.01,2013	3		14 01,2013.	-
	7th Class Mr. Najeeb-ur-Rahman	Buner 01.01.1987	29,10,2014	29,10.2014	3	41	29.10.2014	
		Peshawar 19.04.1981	17.08.2010	17.08.2010	3		19.08.2015	Cadre change 19 08 2015
10	Middle Mr. Saeed Ullah	Peshawar 01,01,1982	03.01.2018	03.01.2018	.3	<b>,</b>	03.01 2018	
	Matric Mr. Rizwan Ullah	Swat 01.01.1983	03.01.2018	03.01.2018	. <b>3</b>	•	03.01.2018	· · · · · · · · · · · · · · · · · · ·
12	Middle Mr. Muhammad hanif F.A	Peshawar 21.12.1983 Peshawar	03.01,2018	03.01.2018	3		03.01.2018	



### TENTATIVE SENIORITY LIST OF THE SWEEPER (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts Vacant

Sr.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government Service	Regular appointment/promotion to the present post			Present appointment	Remarks
1 1 NO. 1 1 NO. 2	Qualification			Date	B.P.S	Method of Rectl:/Appli:	with date	
1	2	. 3	4	5	- 6	7	. 8	.9
1	Mr. Hazrat Usman	01.01.1991 Nowshero	17,8.2010	17.8.2010	3	By Initial	17.8 2010	,
3/	Mr. Sagar	01.01.1989 Mardan	08.01.2013	8.1.2013	. 3		8.1.2013	
3	Mr. Aqeel Samoil	08.04.1990	26.06.2013	26.06.2013	3	**	26.06.2013	
-	F.A.	Pesnawar			· · · · · · · · · · · · · · · · · · ·			•
4	Mr. Waqar	12.06.1990	04.01.2018	04.01.2018	. 3 .	-	04.01.2018	
	FA. Mr. Ajay Kumar	Peshawar 06.09.1995 Peshawar	04.01 2018	04.01.2018	3.	•	04.01 2018	
6	Mr. Sheheryar	07.11.1992	08.01.2018	08.01.2018	3	16	08 01.2018	•
7	Mr. Ijaz Ahmad Malria	06.02.1996 Swat	09.01.2018	09.01.2018	3	11	09.01.2018	·
8	Mr. Yasir Masih	12.04.1984	11.01.2018	11.01.2018	3	н	11.01.2018	
	Middle .	Peshawar						
<b>?</b>	Mr. Inzer Riaz Masin Grad VI	1987 Peshawar	11.01.2018	11.01.2018	. 3	<b></b>	11.01.2018	



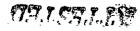


### TENTATIVE SENIORITY LIST OF THE CHOWKIDARS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts Vacant

		ם	ate of 1st	Regular	appointm	nent/pro	nollom	j		
-		,							·	
3 ·	-						-			,

Sr.	Name of Officer/Oficial	Date of Birth with Domicile	Date of 1st entry into Government Service	Regular appointment/promotion  To the present post			Present appointment	Remarks
110.	Qualification			Dale	BPS	Method of Rectt /Appit	with date	
1	2	3	4	5	6	7	8	9
1	Muhammad Adalal	04.01.1962	31.08 1995	31.08.1995	. 3	By Initial	31.08 1995	
•	Matric	Monsehra	•	·.				•
· V	Muhammad Qaisar	05.04.1977 Swabi	02.04 2001	6) 52. <b>2002</b>	3	By Inilial	01.02.2002	
3	Mr. Mohi Room	01 07.1982	12.04.2004	23.07.2005	3	By Initial	23.07.2005	
4 .	Muhammad Rafiullah Khan	01.04.1965 D1Khan	01.11.2007	01.11.2007	3	8y Initial	01.11.2007	· .
. 5	Mr. Shad Muhammad	1977 Nowshera	29.12.2008	29,12,2008	3	By Initia	29.12 2008	· ·
6	Mr. Sajid Muhammad	11.10.1934 Nowshera	29.12 2008	29.12.2008	3	· By Inilia	29.12.2008	
7	Mr. Jamshed Ali Matric	14.04.1979 Swat	10.01.2013	10.01.2013	3	By Initia	09 09 2015	Cadre change 09.09.2015
8 .	Haroon Badshah Matric	03,09.1979 Karak	25.0 <b>5</b> .2017	11.05 1017~	3	By Initia	25.05.2017	<u>.</u>







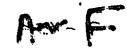
<b>9</b> -	Mr. Karim Khan Matric	02.02.1979 Chitral	03 01.2018	03.01.2018	<b>N</b>	Dv stetu≇	03 01.2018
10	Mr. Abdullah Middle	01.01.1989 Peshawar	04.1.2018	04.01.2018	3	By Initial	04.01.2018
. !!	Mr. Kalim Ullah Middle	25.12.1990 Peshowar	04 01.2018	04.01.2018	14	By Initial	04.01.2018
!2	Mr: Waşim Ahmad Maina	01.01.1994 Peshawar	10.01.2018	10.01.2018		By Initial	10.01.2018
13	Mr Shakir Ullah	20 04 1987	07.03.2018	07.03.2018	<u>;</u>	By Initial	07.03.2018
14	Mr. Yasır Gul	07.11 1993	07.03.2018	07.03.2018	3	By Initial	07.03.2018













### INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, PESHAWAR ATTACHED DEPARTMENT, NEAR JUDICIAL COMPLEX KHYBER ROAD FESHAWAR Ph: 091-9211404-9210815. Fax No. 091-9210236

No. CIM/Admn/Pror	notion Case/c	lass IV/2018	ورس د. مکتوب	Daled:	/ 10 /2018
OFFICE ORDER				•	-

On the recommendation of the Departmental Promotion Committee in its meeting held on 17.09,2018, the Competent Authority is pleased to order the promotion of the following Class IV (BPS-03) of the inspectorate of Mines to It is past of Junior Clarks (BPS-11) and Their posing/transfer with immediate effect in the best public interest. They will be on probation period of one year which is extendable for further one year period in terms of Section 6(2) of Khyber Pakhlunkhwa Civil Servants Act, 1973 read with Ruls-15(1) of Khyber Pakhlunkhwa Civil Servants Appointment Promotion & Transfer) Rules 1989

5.No.	Name of Official with BPS	From	To
1,	Mr.Abdul Wadoorl, Junior Clerk (BPS-11)	Office of Sentor Inspector of Mines Kohal	HQ Office Peshawar
2.	Mr Shuaib Ali, Junior Clerk(BPS-11)	MRSTC Jalozai District Nowshera	HQ Office Peshawar
3.	Mr Rashid Khan Junior Clerk(DPS-11)	-do-	-do-
. 4	Muhammad Bashir Junior Clerk (BPS-11)	-do-	Office of Senior Inspector of Mines Swot
1.5	Mr.Shuhab Ali Juniar Clerk(BPS-1	Office of Servor Inspector of Mines Mardan	Office at Senior Inspector of Mines Mordon
6.	Mr Arwan Chand Junior Clerk(BPS-11)	Office of Senior Inspector of Mines Kohal	Office of Inspector of Mines Buner.

5d/-Chief Inspector of Mines Khyber Pakhlunkhwa Peshawar

Endst: No. CIM/Admn/Promotion Case/class IV/2018/51-6-27 Deted: 28/04: /2018 Copy lorwarded lo:

- S to Secretary Mineral Development Department Govt: of Khyber Pakhtunkhwa Peshawar.
- 2. The Accountant General Khyber Pakhlunkhwa Peshawar.
- 3. he Chief Inspector of Mines Khyber Pakhtunkhwa Feshawar.
- 4. The District Account Office Kohat, Swat. Nowshera, Buner and Mardan.
- 5. The Office of Senior Inspector of Mines Kohat Swal and Mordan.
- 6. The Office of Inspector of Mines Buner,
  7. The Superintendent (MRSTC) Jalozai District Nowshera
- B. The Budget & Account Section HQ Office Peshawa?
- 9 Officials concerned for compliance.
- 10. P/F of the officials concerned. Shahab Alli

Administrative Officer For Chief Inspector of Mines Knyber Pakhtunkhwa Peshawar

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And - G 57

### BEFORE THE HONORABLE PESHAWAR HIGH COURT PESHAWAR

Writ petition No \_\_\_\_\_\_/2020

Muhammad Shoaib (Naib Qasid) 5/0 Muhami

Mohallah Redi Gul Baricham Mardan.....

### <u>VERSUS</u>

- 1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat, Peshawar
- 2. Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar
- 3. Government of Khyber Pakhtunkhwa through Senior Inspector of Mine at Muqam Mandi Mardan
- 4. Government of Khyber Pakhtunkhwa through Secretary Mine and Mineral Department at Civil Secretariat Peshawar
- 5. Government of Khyber Pakhtunkhwa, Directorate of Mine and Mineral through Director General at Khyber Road, Peshawar
- 6. Government of Khyber Pakhtunkhwa through Secretary
  Establishment at Civil Secretariat Peshawar

ATTESTELL

EXAMINED FORDAY HITH COURT

WP243-2020 Muhammad Shoaib vs Govt of kp. full usb pg 50



Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973

#### Respectfully Sheweth:-

Precisely stating the facts of the case out of which the present Constitutional Petition arises as under:-

- 1. That the Petitioner is a law abiding citizen of Pakistan and residing within the territorial jurisdiction of this Honourable Court (Copy of the CNIC is attached as Annex 'A').
- 2. That after passing SSC examination in the year 2006, the Petitioner was appointed as Naib Qasid (BPS-1) in Mines and Mineral Department with effect from 08-01-2013 through office order No 1170-74/3/496.DGMM/Admn. (Copies of the SSC and appointment order are attached as Annex 'B & C').
  - That Mineral Development Department in consultation with Establishment department and Finance department issued notification explaining method for recruitment, qualification and other condition for appointment on posts born in the Inspectorate of Mines KPK. (Copy of the notification is attached as Annex 'D').
  - That as per mentioned notification 33% quota are reserved to Chaffacis. Casids, Naib Qasid and holder of other equivalents post with two year service and 2<sup>nd</sup> class SSC for promotion to the post of Junior Clerk (BPS-11).
- 5. That as per above notification for promotion to Junior Clerk (SPS-11) a joint senior ty list will be prepared on the dates

WPP43-2020 Muhammad Shorib vstGovt of kp. full usb pg 50

1

EXAMINE Pour

of acquiring SSC among Daftari, Qasids, Naib Qasid and holder of other equivalents posts.

- 6. That the Respondents intentionally ignored Petitioner from promotion to the post of Junior Clerk and promoted those, who were not eligible, being a junior in seniority list issued by the Respondents himself. (Copy of the seniority list and promotion order is attached as Annex 'E & F').
- 7. That Petitioner being aggrieved, having no other adequate and efficacious remedy available, is now approaching this Honourable Court intervalia on the following grounds:-

#### GROUNDS:-

- A) That as per policy/notification, the Petitioner is entitled/eligible to be promoted to the post of Junior Clerk (BPS-11) but the Respondents intentionally ignored the Petitioner, which is against the policy and constitution and is clearly discrimination.
- B) That law and precedents discourage the policy of pick and chanse and encourage merit always, but by ignoring the buttoner from a amotion to Junior Clerk (BPS-11) and prompting junior to the said post is clearly indicate the intention of pick and choose by Respondents.

That Petitioner is fit for promotion under 33% quotas in Respondents department.

That there is no complaint of whatsoever against the

ATTESTED.

2020 Muhammad Shorith va Govt of kp. full ushing 50 EXAMINER Peshawar High Court

performing his duties, since his appointment with due diligence.

- E) That promotion of junior and ignoring senior is against law, equity and principle of natural justice.
- F) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

#### PRAYER:-

It is, therefore, most humbly prayed that on acceptance of this Writ Petition, the Respondents may kindly be directed to promote the Petitioner to the post of Junior Clerk (BPS-11) from the post of Naib Qasid (BPS-3) under 33% department promotion quota.

Any other relief, not specifically asked for may be granted in favour of Petitioner.

Petitioner

Through:

(HAFEEZ UL ASAD SHANGLA) Advocate, High Court, Peshawar

Dated: -Un-01-2020

#### CERTIFICATE:-

No such writ petition has earlier been filed by the Petitioner before this

Honourable Court except the instant one

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Advocate

Fig. accration of Islamo Republic of Pakistan, 1973

2. Any other book as per need AT

Peshawar High Court

. WI 243-2020 Muhammad Sheaib vs. Govt of kp full usb pg 50

### PESHAWAR HIGH COURT, PESHAWAR

### ORDER SHEET

r	W COUR
Date of Order of Proceedings	Order or other Proceedings with Signature of Dudge(s)
1	2 (سرائت مایی ۵)
1	
16.07.2020	W.P. No.243-P/2020
	*
	Present: Mr. Hafeez-ul-Asad, Advocate, for the petitioner.
	Mr. Rab Nawaz Khan, AAG, for the
<b>!</b>	Mr. Rab Nawaz Khan, AAG, for the Provincial Government, alongwith Mr.
	Tufail, Assistant, of the respondent-
 	Department.
1	
	*****
	IJAZ ANWAR, J. Muhammad Shoaib, petitioner
	herein, through the instant Constitutional petition under
	Article 199 of the Constitution of the Islamic Republic
	of Pakistan, 1973, is seeking issuance of direction of this
•	Court to the respondents to promote him to the post of
!	Junior Clerk (BPS-11) under 33% Departmental
	Promotion Quota reserved for the Class-IV employees.
	2. Preliminary arguments heard and record perused.
	3. In essence, the grievance of the petitioner pertains
	to his non-consideration for the post of Junior Clerk
	(BPS-11) in terms of 33% Departmental Promotion
	Quota reserved for the Class-IV employees. Similarly,
2.*	petitioner also questioned the vires of the recruitment

ATTESTED

ATTESTED EXAMPLER Peshaorr High Court rules as, according to him, in the earlier rules, there was no condition of 2<sup>nd</sup> Division of S.Sc, while, in the prevailing recruitment rules, such condition has been imposed.

4. In any case, the matter purely relates to the terms and conditions of service of a civil servant and same can better be resolved by the Khyber Pakhtunkhwa Services Tribunal, Peshawar. In view of the bar contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, this writ petition is not maintainable. However, petitioner is at liberty to approach the Departmental Authority and thereafter may file a Service Appeal before the competent forum in accordance with law. This writ petition is disposed of in the above terms.

Announced Dt:16.07.2020

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\*Muhammadullah\* (DB) Harme Mr. Justice Ikramullah Khan and Hon'ble Mr. Justice IJaz Anwa

STEDIES

عصر من جناب سينه إلى الم الم ما تنز ، الردان Was - H الدارش مل سأل نه عدالت عالمه وس اليه يوووش كر يلي اليس جي الرب - جر الأور عوالات عراق الله الم - EWSIL (Stay Order) of I do so بدا آے ماجان عربای کر کے سائل کے در صوارس کو علمانہ طور پر امران بال کی عرب وی ویش کردی 1 July be 12/ July 10 .. العارص 11/06/20:01/ يحر شرمس pul up DFA please il word General file vol. II 2019 ATTINS 1:80

To,

The Secretary, Mineral Development Department, Khyber Pakhtunkhwa.

Through Proper Channel.

Subject:

# APPLICATION OF MUHAMMAD SHOAIB FOR PROMOTION FROM NAIB QASID TO JUNIOR CLERK.

- 1. That, there were 07 post of Junior Clerks means for promotion and the undersigned was at S.No 6 for the promotion.
- 2. That the promotion of the undersigned was covered under the service rules at that time (Copy of Service Rules at Annex-A)
- 3. That the concerned offices at that time purposely on melefide intention did not conduct/call the Departmental Promotion Committee meeting.
- 4. If the DPC was held in time the undersigned would have been promoted on merit.
- 5. That in the year 2018 the inspectorate of mines notified revised service rules there by amending the crieteria for promotion of the post of junior clerk, keeping 2<sup>nd</sup> division SSC Certificate which deprived the undersigned from getting promotion.
- That, Peshawar High Court in its decision on Writ Petition No, 1819-P of 2017 with C,M No. 2121 of 2017 dated 19-19-2017 held that accordingly; we dispose of this petition in terms of directing the respondents to place the case of the petitioner for his promotion to the post of BPS-20 in the upcoming meeting of the Provincial Selection Board, which, as per the learned counsel for the petitioner, is scheduled for 27.12.2017 and the PSB is in turn directed to consider the case the petitioner on its own merits and seniority without considering the course of SMC as mandatory at the moment when the necessary amendments in the rules have not brought about.

Keeping in view the above facts, since the undersigned was eligible for promotion on the basis of service rules date and there 17.10.2010 and there was vacancy available therefore in light of the PHC decision in date 19.10.2017, the undersigned may be given promotion on the basis of criteria laid down in the service rules at that time in order to save me from financial losses and to provide me justice.

STESTED

Muhammad Shoaib Naib Qasid Senior Inspector of Mines, Mardan

7/30g

olc

### بخدمت جناب سينئرانسپكرآف ائيز مردان دويژن, مردان

جناب عالى!

مود بانہ گزارش کی جاتی ہے کہ ساکل نے عدالت عالیہ میں اپنے پروموش کے لیے کیس جمع کیا تھا۔ اس سے پہلے میں نے محکمانہ طور پر 2020-06-11 کو درخواست مجمع کیا تھا جس کا ڈائری نمبر 268 ہے۔جس پرابھی تک کوئی کاروائی نہیں ہوئی۔ ہائی کورٹ نے بھی قانونی کاروائی کے تفصیلی فیصلہ 2020-07- 16 کومحکمہ کوارسال کیا تھاجو درخواست کے ساتھ لف ہے۔لہذا آپ صاحبان مہر بانی کر کے سائل کے درخواست کو تکمانہ طور پرافسران بالا کی خدمت میں پیش کریں تاكسائل كواپناحق مل سكے سائل تاحيات دُعا كو رہے گا۔

توعین نوازش ہوگی۔

مورفد:

آپکا تانع فرمان کیلیا محدشعیب(نائب قاصد) رابط نمبر: 5725205-0313

اطلاع برائے كايى:

سيكثرى منرل ذيبإر ثمنت خيبر يختوان خواه بيثادر

2) \_ چيف انسپکڙ مائيز خيبر پختون خواه پيثاور

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#### INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, PESHAWAR TTACHED DEPARTMENT, NEAR JUDICIAL COMPLEX HYBER ROAD PESHAWAR

746- Fax No. 09 49210236 Email: iomadmn@gmail.com

No. CIM/Admn/Court Cases/M. Shoaib/2020/ St. 21

Dated: 20 /10/2020

To

Muhammad Shoaib (Naib Qasid), Office of Senior Inspector of Mines, Mardan.

Subject:

APPLICATION OF MUHAMMAD SHOAIB FOR PROMOTION FROM NAIB QASID (BPS-03) TO JUNIOR CLERK (BPS-11).

I am directed to refer to Section Officer (Establishment), Minerals Development Department letter No. SO(E)/MDD/2.4/CMI/2020/10477, dated 13.10.2020 and your application on the subject noted above and to state that as per existing Service Rules of the Inspectorate of Mines, Khyber Pakhtunkhwa, criteria for promotion from Naib Qasid (BPS-03) to the post of Junior Clerk (BPS-11) is as under:

> "thirty three percent (33%) by promotion on the basis of seniority cum fitness from amongst the Daftaris, Qasids, Naib Qasids and holders of the equivalent posts with two (2) year service as such and who have second class Secondary School Certificate from a recognized Board".

Hence, you having third division in Secondary School Certificate, are not eligible for promotion to the post of Junior Clerk (BPS-11) as per above mentioned criteria.

In the light of Peshawar High Court Judgment dated 16.07.2020, your appeal has been 2. given thorough consideration. In view of the facts mentioned above, the Competent Authority has come to the conclusion that your prayer for promotion is not buttressed by aforesaid criteria. The Competent Authority has also directed to intimate you that you cannot be promoted to the post of Junior Clerk (BPS-11).

You are therefore, apprised that your appeal for promotion is disposed off on above

3.

put up in relevent file pl.

t MASSistant Director (Administration)

**Inspectorate of Mines** Khyber Pakhtunkhwa

Endstt: No. CIM/Admn/Court Cases/M. Shoaib/2020/

Dated:

/10/2020

Copy forwarded to the Section Officer (Establishment) Minerals Development Department Khyber Pakhtunkhwa with reference to his letter reterred to above.



Assistant Director (Administration) Inspectorate of N ines Khyber Pakhtun! hwa

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# BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Service Appeal No	/2020
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#### Muhammad Shoaib

#### <u>VERSUS</u>

#### Government of KP and others

### <u>INDEX</u>

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE
1.	Grounds of Appeal	-	1-6
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3.	Addresses of the parties		8
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5.	Copy of the rules	'С'	12-22
6.	Copy of the impugned rules	'D'	23-32
7.	Copy of the seniority list and impugned order	'E&F'	33-56
8.	Copy of the writ petition and Appeal	₩ 'G'*	57-65
· 9.	Wakalat Nama (In original)	<u> </u>	

Appellant

Through:

HA

(HAFEEZ-UL-ASAD SHANGLA)

Àdvocaté,

High Court, Peshawar

Cell # 0314-5951897

Dated: -01-10-2020



# BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Service Appeal No 1/549/2020

Diary No. 10989

Dated 05/10/2020

Muhammad Shoaib S/O Muhammad Irshad/R/O Mohallah Radi Gul Bari Cham Mardan (Naib Qasid at Senior Inspector of Mine at District Mardan)......(Appellant)

#### VERSUS

- 1. Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar
- Government of Khyber Pakhtunkhwa through Senior
   Inspector of Mine at Muqam Chowk, Mardan
- 3. Government of Khyber Pakhtunkhwa through Secretary Mine and Mineral Department at Civil Secretariat, Peshawar
- 4. Government of Khyber Pakhtunkhwa through Secretary
  Establishment at Civil Secretariat, Peshawar
- 5. Government of Khyber Pakhtunkhwa through Secretary Finance at Civil Secretariat, Peshawar.....(Respondents)

Filedto-day

Registrar

5 10 76 70

Appeal under Section 4 (a) of Khyber Pakhtunkhwa Service Tribunal Act, 1974 for declaring void ab-initio the method/rules of promotion to post of Junior Clerk from Naib Qasid on 33% departmental quota specified on serial No 24 notified through Notification dated 22-11-2017, No SOE/MDD/2-1/Vol-II/2017 published on 25-06-2018 and also promotion made under it through impugned notification/order dated CIM/Admn/Promotion case Class-IV/2018/5106-27 dated 28<sup>th</sup> September, 2018 or otherwise of those who are juniors from Appellant and consequently to consider the Appellant for promotion to the post of Junior Clerk (BPS-11) from Naib Qasid on 33% departmental quota in according to the rules/method of appointments notified on 17<sup>th</sup> October, 2010 through notification No. SO.Admn (MD) 1-6/88 Vol-V published on 09-09-2016.

Departmental appeal of Appellant is pending since 11-06-2020 and yet not decided, hence this Appeal

#### Respectfully Sheweth:

Brief facts of the instant appeal are as under:-

- That after passing SSC examination in the year 2006 the Appellant was initially appointed as Naib Qasid (BPS-1) in Mines and Mineral Department with effect from 08-1-2013 through office order NO 1170-74/3/496 DGMM/Admin. (Copy of the SSC and appointment letter is attached as Annex 'A and B').
- 7 That Respondent reserved through method of appointment rules notified on 17-10-2010. 33% of Junior Clerk to be fill through promotion from BPS-1 and BPS-2 having

3

passed SSC and having 02 years service. (Copy of the rules is attached as Annex 'C').

- That thereafter the Respondent revised/changed the rules method of promotion to Junior Clerk from Naib Qasid on 33% reserved quota and in 2018 introduced the impugned revised method/rules through notification No SOE/MDD/2-1/Vol-II/2017 dated 22-11-2017 published on 25-6-2018 and declared eligible only those who have passed SSC in 2<sup>nd</sup> division. (Copy of the impugned rule is attached as <u>Annex</u> 'D').
- 4) That by changing/revising the initial method, the Respondents closed the door of promotion of junior clerk from Naib Qasid on Appellant and many other having no 2<sup>nd</sup> division in SSC and hence deprived Appellant from promotion.
- That issuing revised rules seniority of Appellant was effected and those junior from Appellant was promoted to junior clerk on 33% reversed quota through impugned order dated 28-09-2018. (Copy of seniority list and impugned order is attached as Annex 'E & F').
- That thereafter, Appellant filed W.P No 243-P/2020 for his promotion to junior clerk (BPS-11) from Naib Qasid (BPS-3) which was decided on 16-07-2020 with direction to Appellant to approach the departmental authority and

Service Tribunal being a competent forum. (Copy of the writ petition is attached as <u>Annex 'G'</u>).

- That meanwhile on 11-06-2020 Appellant filed departmental appeal for his promotion and also reminder on 24-08-2020 for deciding the appeal, but yet not been decided though a statutory period of 90 days as provided under Section 4 (a) Service Tribunal Act, 1974 already been lapsed. (حمون عم المجادة)
- 8) That now Appellant having no other adequate remedy except to file this appeal on the following grounds amongst other:-

#### **GROUNDS:-**

- A) That promotion of Appellant was covered under the Rules 2016 but Respondents purposely on mala-fide intention did not conducted/call the Departmental Promotion Committee meeting and hence deprived Appellant for his legal right of promotion.
- B) That Revised Service Rules of 2018 deprived Appellant from his legal right to promotion to the post of junior clerk (BPS-11) on 33% quota, which is against the law, hence liable to declared void ab-initio.
- C) That all the promotion order made under Revised Service Rules of 2018 of junior clerk from Naib Qasid of the junior in seniority from Appellant are liable to be set aside



whether made through impugned order dated 28-09-2018 or otherwise.

- D) That revised rules/method of promotion under 33% quota encourage the policy of pick and choice while constitution provides and encourage equal opportunity to all, hence revised rules and promotion made under it to the post of junior clerk on 33% departmental quota are liable to be set aside and void.
- E) That Appellant perfoming his duties with due diligence since his appointment and no complaint is against him uptill now.
- That promotion of juniors and ignoring seniors is against the law and equity and introduction of rules/method of promotion of his own choice by the Respondent will encourage the policy of pick and chose and will discourage the civil servant to perform his duties with due diligence.
- G) That any other ground, not raised specifically may graciously be allowed to be raised at the time of arguments.

#### PRAYER:-

It is, therefore, most respectfully prayed that on acceptance of this Appeal, the instant Appeal may kindly be allowed as prayed for in favour Appellant.

Any other relief, which this Honourable Court deems proper and fit may kindly be granted/passed in favour of Appellant against the Respondents.

#### INTERIM RELIEF:-

By way of interim relief, the Respondents may kindly be restrained to not promote on 33% departmental quota to the post of Junior Clerk (BPS-11) from Naib Qasid (BPS-3) till the final final disposal of instant appeal.

کیاک. Appellant

Through:

(HAFEEZ-UL-ASAD SHANGLA)

H-A-D

Advocate,

Dated: -01-10-2020

High Court Peshawar

#### NOTE:-

No such appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one.

Advocate

Appallant M. 525



# BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Muhammad Shoaib.....(Appellant)

#### VERSUS

Government of KP and others.....(Respondents)

#### **AFFIDAVIT**

I, Muhammad Shoaib S/O Muhammad Irshad R/O Mohallah Radi Gul Bari Cham Mardan (Naib Qasid at Senior Inspector of Mine at District Mardan), do hereby solemnly affirm and declare on oath that all the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

Identified by:-

(HAFEEZ-UL-ASAD SHANGLA) Advocate

High Court, Peshawar





#### BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

### Muhammad Shoaib VERSUS Government of KP and others

#### MEMO OF ADDRESSES

#### **APPELLANT**

Muhammad Shoaib S/O Muhammad Irshad R/O Mohallah Radi Gul Bari Cham Mardan (Naib Qasid at Senior Inspector of Mine at District Mardan)

#### RESPONDENTS

- 1. Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar
- Government of Khyber Pakhtunkhwa through 2. Inspector of Mine at Muqam Chowk, Mardan
- 3. Government of Khyber Pakhtunkhwa through Secretary Mine and Mineral Department at Civil Secretariat, Peshawar
- 4. Government of Khyber Pakhtunkhwa through Secretary Establishment at Civil Secretariat, Peshawar
- 5. Government of Khyber Pakhtunkhwa through Secretary Finance at Civil Secretariat, Peshawar

Appellant

Through:

(HAFEEZ-UL-ASAD SHANGLA)

Advocate,

Dated: -01-10-2020 High Court, Peshawar

3	.No. oli No.	121907		4	É			A~x-	A
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# DIRECTORATE GENERAL OF MINES AND MINERALS KHYBER PAKHTUNKHWA ATTACHED DEPARTMENT COMPLEX KHYBER ROAD PESHAWAR

No. \_\_\_\_\_\_/3/496/DGMM/Admn.

Dated \_\_\_\_\_/ 01 / 2013

#### OFFICE ORDER

On the recommendations of the Departmental Selection Committee, Mr. Muhammad Shoaib S/o Muhammad Irshad, R/o Ridi Gul Barhi Chum Mardan, is hereby appointed as Naib Qasid (BPS-1) (4800-150-9300) plus usual allowances with effect from 08-01-2013 (Fore-noon) on the terms and conditions already conveyed to him vide this Directorate letter No.201/1/17/DGMM/Admn: dated 07-01-2013.

He is posted in the office of Senior Inspector of Mines Mardan

Sd/-Director General Mines and Minerals Khyber Pakhtunkhwa.

性的 No. 1170 - 79

. /3/496/DGMM/Admn A copy is forwarded to:

- 1- The District Accounts Officer Mardan.
- 2- The Senior inspector of Mines, Mardan.
- 3- The Assistant Director (Accounts), H.Q. Office Peshawar.
- 4- Mr. Muhammad Shoaib, Naib Qasid, o/o the Senior Inspector of Mines Mardan.

5- File No. 1/17-Admn;

(MUHAMMAD ARSHAD) Administrative Officer For /Director General

161/2013

Office of the inspector of cates obout Western

TTESTER

The Senior Inspector of Mines Mardan Division, Mardan.

Sub: D/Sir,

APPOINTMENT AS NAIB OASID (BPS-1) / HASINGE Reform

Refer to Directorate General Mines & Minerals, Khyber Pukhtunkhwa letter No 201/1/17//DGMM/ dated 7/1/2013, and to accept the terms and conditions mentioned in the offer

I hereby report for joining duty w.e.f. 3/1/2013 (F.N) as Naib Quaid accordingly. and submit my medical certificate from M/Superintendent DHQ Hospital, Mardan.

Submitted for necessary action please.

Your's faithfully

AI. Show

Muhammad Shoaib S/O Muhammad Irshad, Moh:Redi Gul Bari Cham Mardan.

2 1/8/1/2013

NOA

**EXTRAORDINARY** 

GOVERNMENT



REGISTERED NO. P

GAZETTE



### KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 9TH SEPTEMBER, 2016

GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT & ADMN: DEPARTMENT (REGULATION WING)

#### NOTIFICATION

Dated Peshawar, the 17th October, 2010

No. SO-Admn (MD) 1-6/88 Vol-V. - In pursuance of the provisions contained in sub-rule (2) of rule-3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules 1989, and in supersession of all Notifications issued in this behalf, the Minerals Development Department, in consultation with the Establishment Department and the Finance Department, hereby lay down the method of recruitment, qualifications and other conditions specified in column No.3 to 5 of the Appendix to this Notification which shall be applicable to the posts borne in the Directorate General Mines & Minerals, Khyber Pakhtunkhwa specified in Column No.2 of the said Appendix.

> Secretary to Govt. of Khyber Pakhtunkhwa **Mineral Development Department**

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

ATTESTED

# APPENDIX DIRECTORATE GENERAL MINES AND MINERALS

S.No.	Nomenclature of the Pos	Minimum Qualification Prescribed for Appointment By Initial Recruitment.	Age Limit	Method of Recruitment
1	2	3		
1.	Director General Mines and Minerals	·	4	(a) By promotion, on the basis of selection on merit, fro
	(BPS-20)			amongst the Director Exploration (Minerals). Direct Licensing Chief Inspector of Mines and Commissioner Mine Labour Welfare, having at least seventeen years service BPS-17 and above, and in case of persons initially appointed in BS-18, the length of service for promotion to the post shabe twelve years in BPS-18 and above; or.  (b) By transfer from the provincial Government Department.
2.	Director Exploration	EXPLORATION PROMOTION (	DIVISION	nent.
	(Minerals) (BPS-19)	<del></del>		By promotion, on the basis of seniority-cum-fitness, from amongs the Deputy Directors (Exploration) with at least twelve year service in BPS-17 and above
3.	Deputy Director			service in BPS-17 and above.
	(Exploration) (BPS-18)	<del></del>		By promotion, on the basis of senicrity-cum-fitness, from amongs the Assistant Directors (Geologists) and Assistant Directors (Mining Engineer) with at least five users.
4.	Manager Geographical	(a) Master's Degree in Geographical Information System (GIS)	25 to 45	The service as such
F	Information System(GIS) (BPS-18)	I or computer science or equivalent qualification from I	years	By initial recruitment.
,		(b) Minimum of five years Geo-graphical Information System	,	
5. A	Assistant Director	related experience from a reputed Organization	ļ	•
	Geologist)	Master's Degree in Geology from a recognized University.	21 to 30	(a) By initial recruitment; or
(1	BPS-17) '		years	<ul> <li>(b) if no suitable candidate is available for initial recruitment, then by transfer from amongst the Assistant Directors (Geologists).</li> </ul>



## KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24<sup>th</sup> NOVEMBER, 2016. 80

6. 7	Assistant Director (Mining Engineer) (BPS-17)	Bachelor's Degree in Mining Engineering from a recognized University.	years	(a) By initial recruitment; or (b) If no suitable candidate is available by initial recruitment, the by transfer from amongst the Assistant Directors (Minitial Engineers).
	Geographical Information System (GIS) Development Officer (BPS-17)	<ul> <li>(a) Master's Degree in Geographical Information System from a recognized University; or</li> <li>(b) Master's Degree in Geography/Geology from a recognized University with one-year Diploma in Geographical Information System from a recognized Institute/University.</li> </ul>	Venre	By initial recruitment.
8.	Database Administrator (BPS-17)	Master's Degree in Computer Science or equivalent qualification, from a recognized University with one year Diploma in Geographical Information System from a recognized Institute/University.	21 to 32 years	By initial recruitment
9.	Manager Information (BPS-17)	Master's Degree in Computer Science or Business Administration or Geology or equivalent qualification from a recognized University with one year Diploma in Geographical Information System from a recognized Institute/University.	21 to 32 years	By initial recruitment.
10.	Librarian (BPS-16)	Master's Degree in Library Science from a recognized University.	21 to 32 years	By initial recruitment.
1,	Computer Technician (BPS-16)	Bachelor's Degree with Computer Science from a recognized University.	21 to 32	By initial recruitment
2.	Data Entry Operator (BPS-12)	Bachelor's Degree with Computer Science from a recognized University with 5,000, key depressions per hour for processing/data entry information.	years 21 to 32 years	By initial recruitment.
3.	Cartographer/Draftsman (BPS-11)	Intermediate with Certificate or Diploma in Cartography from a recognized Board, with two years experience in AutoCAD/ Geographical Information System Software.	21 to 32 years	By initial recruitment.
,		LICENSING DIVISION		
,	Director Licensing (BPS-19)		/	By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors (Technical), with at least twelve years service in BPS-17 and above.

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15	Deputy Director (Technical) (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from amongs the Assistant Directors (Technical) (Mining Engineer)/ Geologis Assistant Directors (Royalty), with at least five years service a such
16	Assistant Director Technical (Mining Engineer) (BPS-17)	Bachelor's Degree in Mining Engineering from a recognized University.	21 to 30 years	<ul> <li>(a) Thirty-five per cent by promotion, on the basis of seniority-cum-fitness from amongst the Mineral Development Officers (Technical) with at least five years service as such;</li> <li>(b) Fifteen per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Mineral Development Officers (Non-Technical) with at least five years service as such; and</li> <li>(c) Fifty per cent by initial recruitment.</li> </ul>
17.	Geologist (BPS-17)	Master's Degree in Geology from a recognized University	21 to 30 years	(a) Fifty per cent by initial recruitment: and (b) Fifty per cent by promotion, on the basis of seniority-cumfitness from amongst the Mineral Development Officers (Technical) with at least five years service as such
18.	Assistant Director (Royalty) (BPS-17)		4-4-	By promotion, on the basis of seniority-cum-fitness, from amongst the Mineral Development Officers (Non-technical) with at least five
19.	Assistant Director (Survey and Drawing) (BPS-17)			By promotion, on the basis of seniority-cum-fitness, from amongst the Survey and Drawing Officers with at least five years service as such.
20	Chief Draftsman (BPS-17)			By promotion, on the basis of seniority-cum fitness from any con-
21,	Mineral Development Officer (Technical) (BPS-16)	Bachelor's Degree in Mining Engineering or Master's Degree in Geology from a recognized University.	21 to 30 years	the Draftsmans with at least five years service as such.  By initial recruitment.
22.	Mineral Development Officer (Non-Technical) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst the post of the Royalty Inspectors with at least 10 years service as such.
23.	Survey and Drawing Officer (BPS-16)	(i) Intermediate from a recognized board. (ii) Surveyor Certificate from a recognized Institute, and (iii) Mine Surveyor Certificate granted under the Mines Act. 1923 and three years' experience in mine survey	21 to 30 years	(a) Fifty percent by promotion, on the basis of seniority-cumfitness, from amongst the Surveyors with at least five years service as such; and (b) Fifty per cent by initial recruitment.

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24	Royalty Inspector (BPS-11)	Bachelor's Degree from a recognized University.	21 to 30	By initial recruitment.
			years	
25.	Surveyors	(a) Intermediate (Pre-Engineering) or equivalent qualification	18 to 30	By initial recruitment
	(BPS-11)	from a recognized Board;	years	
		(b) Mines Surveyors Competency Certificate under the Mines Act, 1923; and		
		(c) Certificate in Auto CAD from a recognized Institute.	•	
		to octahodic in viato one non a readynized mathate.		·
26	Draftsman (BPS-11)	(i) Secondary School Certificate or equivalent qualification	18 to 30	(a) Fifty per cent by initial recruitment, and
		from a recognized Board: and	years	(b) Fifty per cent by promotion, on the basis of seniority-cum
		(ii) Diploma or Certificate in Draftsmanship/Survey from a recognized Institute.		fitness from amongst the Tracers with at least five years service as such.
27.	Tracer (BPS-05)	Secondary School Certificate or equivalent qualification with	18 to 30	(a) Eighty per cent by initial recruitment, and
		drawing as one of the subject from a recognized Board.	years	(b) Twenty per cent by promotion on the basis of seniority-cum-
				fitness from amongst the Ferro Printer with at least two years service as such.
28.	Ferro Printer (BPS-02)	Secondary School Certificate from a recognized Board.	18 to 30	By initial recruitment
		,	years	
29.	Chainman (BPS-01)	Secondary School Certificate from a recognized Board.	18 to 30	By initial recruitment
<u> </u>			years	
30.	Mineral Guard	Secondary School Certificate from a recognized Board.	18 to 30	By initial recruitment.
	(BPS-01)		years	
<u> </u>		INSPECTORATE OF MINES LABOUR	WELFARE.	
31.	Chief Inspector of Mines/ Commissioner Mines Labour	<del></del>	are -100 -110	(a) By promotion, on the basis of seniority-cum-fitness, from
	Walfare			amongst the Senior Inspector of Mines and Deputy Commissioner Mines Labour Welfare with at least twelve
	(BPS-19)			years service in BPS-17 and above, or
	1			(b) if no suitable candidate is available for promotion then by
				transfer.
32.	Deputy Commissioner	Bachelor's Degree in Mining Engineering from a recognized	25 to 40	(a) By promotion, on the basis of seniority-cum-fitness, from
	Mines Labour Welfare (BPS-18)	University with at least seven years experience in the relevant field.	years	amongst the Assistant Commissioners Mines Labour Welfare with at least five years service as such, or
	(3.0-10)	1:014.		(b) If no suitable candidate is available for promotion then by
	( <del> </del>			initial recruitment.
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33.	Senior Inspector of Mines/ Rescue Superintendent. (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from among the Inspector of Mines/ Instructor with at least five years.
34.	Inspector of Mines/Instructor.	(a) Bachelor's Degree in Marin 5		the Inspector of Mines/ Instructor with at least five years service such.
	(BPS-17)	<ul> <li>(a) Bachelor's Degree in Mining Engineering from a recognized University.</li> <li>(b) First Class Mines Managers Certificate of competency granted under the provision of Mines Act. 1923; and</li> <li>(c) two years experience in Govt or Semi-Govt Mining Industries registered under the Mines Act, 1923.</li> </ul>	years	By initial recruitment.
		In case of non-availability of candidates possessing the qualification at clause (b) above, a candidate possessing the remaining qualification and experience may be appointed provided that he shall have to pass First Class Mines Manager's Certificate of competency during the probation period failing which his services shall be terminated.		
35.	Assistant Commissioner Mines Labour Welfare (BPS-17)	Bachelor's Degree in Mining Engineering or Master's Degree in Social Sciences from a recognized University.	21 to 32	By initial recruitment.
36.	Rescue Apparatus Technician (BPS-16)	Three years Diploma in Mechanical Tooks I	years 21 to 30	· · · · · · · · · · · · · · · · · · ·
7.	Rescue Supervisor	recognized Polytechnic Institution.  Bachelor's Degree in Mining Engineering from a recognized	years	By initial recruitment.
8.	(BPS-16) Secretary Mines	University.	21 to 30 years	By initial recruitment
	(BPS-16)			By promotion, on the basis of seniority-cum-fitness, amongst the Project Mechanic with at least three years service as such.
9.	1	Three years Diploma in Electrical or Mechanical Engineering from a recognized Institute. Preference will be given to the candidate having some experience in the field.	21 to 30 years	By initial recruitment.
	Overseer [	Three years Diploma in Civil Engineering from a recognized Institute.	21 to 32 years	By initial recruitment.



### KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016. 84

41	Medical Technician		<del></del>	
41.	(BPS-11)	<ul> <li>(a) Secondary School Certificate with Science from a recognized Board;</li> <li>(b) Certificate of Medical Technician from a recognized medical faculty, and</li> <li>(c) two years experience in the relevant field.</li> </ul>	18-30 years	By initial recruitment.
		MINERALS TESTING LABORA	ATORY	
42	Chief Geochemist (BPS-19)	Master's Degree in Chemistry or Geology from a recognized University with twelve years experience in Mineral Testing/Analysis and Mineralogical Studies respectively.		<ul> <li>(a) By promotion on the basis of seniority-cum-fitness, from amongst the Senior Chemists and Senior Mineralogists with at least twelve years service in BPS-17 and above.</li> <li>(b) If no suitable officer is available for promotion then by initial recruitment.</li> </ul>
43.	Principal Research Officer (BPS-19)	<ul> <li>(a) Bachelor's Degree in Metallurgical or Mining Engineering from a recognized University; and</li> <li>(b) at least twelve years experience of Research Development work for Mineral Processing, Up-gradation, Concentration or Extraction conducted in any reputable Research and Development Organization or Mineral Processing Laboratory or Mineral Based Industry.</li> </ul>	30 to 45 years	<ul> <li>(a) By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Mineral Processing Engineers with at least twelve years service in BPS-17 and above, or</li> <li>(b) If no suitable officer is available for promotion then by initial recruitment.</li> </ul>
44. 	Senior Chemist (BPS-18)		# 10 · _	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Chemists with at least five years service in BPS-17 as such.
45.	Senior Mineral Processing Engineer (BPS-18)	<ul> <li>(a) Bachelor's Degree in Metallurgical or Mining Engineering from a recognized University; and</li> <li>(b) At least seven years experience of Research and Development work for Mineral Processing, Up-gradation, Concentration or Extraction conducted in any reputable Research and Development Organization or Mineral Processing Laboratory or Mineral Based Industry.</li> </ul>	28 to 40 years	By initial recruitment.
46.	Senior Mineralogist (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Mineralogists and Assistant Gemologists with at least five years service in BPS-17 as such.

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				114AN1, 24 140 VEIVIBER, 2016.
47.	Assistant Gemologist	Master's Degree in Geology with Specialization		
	(BPS-17)		25 to 35	
48	· · · · · · · · · · · · · · · · · · ·	1 miletalogy/Fetrology from a recognized University		By initial recruitment
40	Assistant Mineralogist	Master's Degree in Geology with Specialization in Mineralogy,		· ·
	(BPS-17)	Petrology from a recognized University	21 to 32	By initial recruitment
49.	Assistant Chemist	The state of the s	years	o) ungar recruititietti
	(BPS-17)	Master's Degree in Chemistry with Specialization in	21 to 32	
	(5) 5-17)	Thorganic/Analytical of Applied Chemistry from a recognized		By initial recruitment
		University.	years	
50	Laboratory Technician	Intermediate from a recognized Board with Diploma in		,
	(BPS-14)	Mechanical Chamical or Floating Found with Diploma in	21 to 32	(a) By promotion, on the basis of seniority-cum-fitness.
		Mechanical, Chemical or Electrical from a recognized Technical	years	amongst the Junior Laborates T. Seniority-cum-fitness.
		Board with seven years experience in the relevant field.		- 30 W GOING EQUUIAIDIV I ACCONICION WILL - 1
	7			
<u> </u>				portion is available for promotion then by in
51	Junior Laboratory	Secondary School Certificate from a recognized Board with		recruitment.
	Technician	Diploma in Chamical/Machanists of the Cognized Board with	21 to 32	By initial recruitment.
	(BPS-11)	Diploma in Chemical/Mechanical or Electrical Technology from	years	by initial recruitment.
	1	To recognized reciffical Board with at loop five	,	
52.				
JZ.	Electrical Supervisor	Secondary School Certificate with Diploma in Electrical		
	(BPS-10)	Technology from a recognized Technical Board with at least five	18 to 32	By initial recruitment.
j	-	vears experience of work as Eleast five.	years	by which reciditinent.
ļ		years experience of work as Electrician in any reputable Organization.		
53.	Laborator, Att.			
JJ.	Laboratory Attendant (BPS-01)	Literate	10   00	
	(BPS-U1)		18 to 32	By initial recruitment.
			years	y most conditinging.
54.	Assistant Director	COMMON POSTS		
	(Administration)			
}	(BPS-17)			By promotion, on the basis of seniority-cum-fitness, from among
				The state of the s
55.	Assistant Director			Administrative Officer,
İ	(Accounts)			By promotion on the hours
Ì	(BPS-17)			By promotion, on the basis of seniority-cum-fitness, from among the Budget and Accounts Officers having the seniority from the basis of seniority-cum-fitness, from among the Budget and Accounts Officers having the seniority from the basis of seniority-cum-fitness, from among the Budget and Accounts Officers having the seniority from the basis of seniority-cum-fitness, from among the Budget and Accounts Officers having the basis of seniority-cum-fitness.
	Assistant Director		1	
٠.	rosistant Director	(a) Bachelor's Degree in Mining Engineering, from a		as Budget and Accounts Officer.
ĺ	(Planning and Development)	recognized University; or	21 to 32	By initial recruitment
!	(BPS-17)	(b) Master in Business Administration, Commerce, Geology	years	=7 magricorditinent
	CO CONTROLL / STATE OF	The second of th		
		and Economic from a recognized University.	1	



### KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 241' NOVEMBER, 2016. S6

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	Senor Cherk  RP 3-09.		,	By promotio, on the attest of ken anty-cum-filtness, from emoryst the Jurior 1954, which is the pt in service as such
63 54	Computer Operator/D~13 Entry Operator/Key Punch Operator , 3PS-12;	(i) Intermediate with Statics as one of the subject from a recognized board, and (ii) A minimum speed of 10,000 key depressions par hour for punching / data entry variheation.	18 to 28 years	By smitial recruit, nent
ર્ડ	Junior Scale Stenographei (BPS-12)	(ii) Intermediate or equivalent qualification from a recognized Board, and (iii) A speed of 80 words par minute in shorthand in English & 35 words par minute in typing	18 to 23 years	By initial recruitment.
6	Assisot (823-14)	Bachelor Degree from a recognized University	21 to 32 years "	(a) 75% by promotion on the basis sembrity-cum-fitness amongs; the Serior Clerk with at least five years service as such, and the py initial recruitment.
	(BPS-15)	Bachelor degree or equivalent qualification from a recognized universit, and  ur' A execut of 100 words per minute in short hand in English and forty words in typing.	21 to 32 years	<ul> <li>(a) Eighty per cent by promotion on the basis of seniority- cumfitness, from amongst the Junior Seale Stanographers with at least five years service, as such, and</li> <li>(b) Twenty per cent by initial recruitment</li> </ul>
90	(BPS-16) / Senior Scale Stenograpmer	(* Bachelor degrée or entivation qualification frame		By promotion, on the basis of semonty-com-fitness, from amongst the Assistants/Senior Scale Stenographers with at least five years service as such.  Hote: Joint semonty of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion to the post of Superintendent. Provided that when the date of continuous appointment of an Assistant and Senior Scale Stenographer is the same, the Assistant shall be deemed to be rank senior to the Senior Scale Stenographer.
69	Superinte idin			
58	Budget and Auchunts \ Qticer (8PS-19)		<u> </u>	By transfer from amongst the Superintendents.
57	Administrative Officer (BPS-16)			By transfer from amongst the Superinfundants.

# KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24<sup>th</sup> NOVEMBER, 2016. 86

57.	Administrative Officer		<del>-</del>	101, 24 NOVEMBER, 2016. 86
	(BPS-16)			By transfer, from amongst the Superintendents.
58.	Budget and Accounts Officer (BPS-16)			By transfer, from amongst the Superintendents.
59.	Superintendent (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongs the Assistants/Senior Scale Stenographers with at least five year service as such
60.	Senior Scale Stenographer	(i) Bachelor degree or ognivelent		Note: Joint seniority of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion to the post of Superintendent. Provided that when the date of continuous appointment of an Assistant and Senior Scale Stenographer is the same, the Assistant shall be deemed to be rank senior to the Senior Scale Stenographer.
	(BPS-15)	Bachelor degree or equivalent qualification from a recognized university, and     A speed of 100 words per minute in short hand in English and forty words in typing.	21 to 32 years	<ul> <li>(a) Eighty per cent by promotion, on the basis of seniority- cumfitness, from amongst the Junior Scale Stenographers with at least five years service, as such, and</li> <li>(b) Twenty per cent by initial recruitment.</li> </ul>
61.	Assistant (BPS-14)	Bachelor Degree from a recognized University.	21 to 32 years	(a) 75% by promotion on the basis semority-cum-fitness, amongst the Senior Clerk with at least five years service as such; and
62.	Junior Scale Stenographer (BPS-12)	<ul> <li>(i) Intermediate or equivalent qualification from a recognized Board; and</li> <li>(ii) A speed of 80 words per minute in shorthand in English &amp; 35 words per minute in typing.</li> </ul>	18 to 28 years	(b) 25% by initial recruitment.  By initial recruitment.
	Computer Operator/Data Entry Operator/Key Punch Operator (BPS-12)	<ul> <li>(i) Intermediate with Statics as one of the subject from a recognized board; and</li> <li>(ii) A minimum speed of 10,000 key depressions per hour for punching / data entry verification.</li> </ul>	18 to 28 years	By initial recruitment.
	Senior Clerk (BPS-09)			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks with at least five years service as such



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65.	Junior Clerk (BPS-07)	(ii) Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) A speed of 30 words per minute in typing.	18 to 28 years	<ul> <li>(a) Thirty-three per cent by promotion, from amongst BPS-01 BPS-02 who have passed Secondary School Certificat from recognized Board and have at least two years service as such; and</li> <li>(b) Sixty-seven per cent by initial recruitment.</li> <li>Note: A candidate passing the examination earlier shall rank senior the candidates passing the examination latter provided that if two or more candidates have passed the said examination in the same session, the candidate older in age shall rank senior to the younger candidates.</li> </ul>
66.	Crewman (BPS-05)	<ul> <li>(i) Secondary School Certificate with science, from a recognized Board; and</li> <li>(ii) Mine Sardar Certificate granted under the Coal Mines Regulation, 1926.</li> <li>Note: Preference shall be given to the candidate, having experience in rescue and recovery, as rescue apprentice, at any recognized Mines Rescue and Safety Station.</li> </ul>	18 to 30 years	By initial recruitment.
67	Tube-well Operator (BPS-05)	Secondary School Certificate from a recognized Board; Note: Preference shall be given to the candidate having some experience, in Tube-well Operations.	18 to 30 years	By initial recruitment.
68	Driver (BPS-04)	Literate, and     In possession of a valid HTV/LTV Driving License with five years practical experience.	18 to 32 years	By initial recruitment.
69.	Daftari (BPS-02)	Middle passed.	18 to 28 years	(a) Fifty per cent by promotion, on the basis of seniority-cumfitness from amongst the Naib Qasid: and     (b) fifty per cent by initial recruitment.
70.	Naib Qasid (BPS-01)		18 to 28 years	By initial recruitment.
	Chowkidar (BPS-01)		18 to 28 years	By initial recruitment.
	Mali (BPS-01)	. Gardening experience.	18 to 30 years	By initial recruitment.

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# KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th NOVEMBER, 2016. 88

	73.	Sweeper			
- }	ı	(BPS-01)	 18 to 28		-
L		<u> </u>		By initial recruitment	
		•	years		

# SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA MINERALS DEVELOPMENT DEPARTMENT

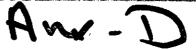
Printed and published by the Manager, Staty. & Ptg. Deptt., Khyber Khyber Pakhtunkhwa, Peshawar

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**EXTRAORDINARY** 

GOVERNMENT



REGISTERED NO. PHI

GAZETTE

51940:-24

#### KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, MONDAY, 25th JUNE, 2018.

### GOVERNMENT OF THE KHYBER PAKHTUNKHWA MINERALS DEVELOPMENT DEPARTMENT

#### NOTIFICATION

Dated Peshawar, the 22rd November, 2017.

No.SQE/MDD/2-1/Vol-11/2017.-In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment Promotion and Transfer) Rules, 1989, and in supersession of all previous Notifications issued in this behalf, to the extent of posts borne in the Inspectorate of Mines Khyber Pakhtunkhwa, the Minerals Development Department in consultation with the Establishment Department and the Finance Departments, hereby lays down the method of recruitment, qualifications and other conditions specified in column No. 3 to 5 of the Appendix to this Notification which shall be applicable to the posts borne in the Inspectorate of Mines Khyber Pakhtunkhwa specified in column No. 2 of the said Appendix.

#### APPENDIX

S.No	Nomenclature of Posts	Minimum Qualification for Appointment by Initial Recruitment	Age Limit	Method of Recruitment
1	2	3	4	5
1.	Chief Inspector of Mines (BPS-20)		1,	By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Chief Inspectors of Mines, Directors Training and Directors Planning and Mine Development



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		_ <del>_</del>	Call with at least trialing (12) years confer
			Cell with at least twelve (12) years service as such in BPS-18 and above or seventeen (17) years service as such in BPS-17 and above with successful completion of Senior Management Course (SMC)
			Provided that if no suitable person is available for promotion then by transfer.
		÷	Note: A joint seniority list of Deputy Chief Inspectors of Mines, Directors Training and Directors Planning and Mine Development Cell shall be maintained for the purpose of promotion
2.	Deputy Chief Inspector of Mines (BPS-19)	 	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Inspectors of Mines and Rescue Superintendents with at least seven (U/) years service as such in BPS-18 or twelve (12) years service as such in BPS-17 and above:
,			Provided that if no suitable person is available for promotion then by transfer.
			Note: A joint seniority list of Senior Inspectors of Mines and Rescue Superintendents shall be maintained for the purpose of promotion.
3.	Director Training (BPS-19)	 	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Inspectors of Mines and Rescue Superintendents with at least seven (07) years service as such in BPS-18 or twelve (12) years service in BPS-17 and above:







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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25° JUNE, 2018

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1	0	4	•

				Provided that if no suitable person is available for promotion then by transfer.
				Note: A joint seniority list of Senior Inspectors of Mines and Rescue Superintendents shall be maintained for the purpose of promotion.
4.	Director Planning and Mine Development Cell (BPS-19)			By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Inspectors of Mines and Rescue Superintendents with at least seven (07) years service as such in BPS-18 or twelve (12) years service as such in BPS-17 and above:  Provided that if no suitable person is available for promotion then by transfer.  Note: A joint seniority list of Senior Inspectors of Mines and Rescue Superintendents shall be maintained for the purpose of promotion.
5	Senior Inspector of Mines (BPS-18)	<ul> <li>(i) At least Second Class Bachelor's Degree in Mining Engineering from a recognized University;</li> <li>(ii) First Class Mine Manager Certificate of Competency granted under the provision of Mines Act 1923; and</li> <li>(iii) At least seven years experience in mining.</li> </ul>	28 to 40 years.	By promotion, on the basis of seniority-cum-fitness, from amongst the Inspectors of Mines and Instructors with at least five years services as such and having First Class Mine Manager Certificate of Competency granted under the provision of Mines Act 1923:  Provided that if no suitable person is available for promotion then by transfer or initial recruitment.  Note: A joint seniority list of Inspectors of Mines and Instructors shall be maintained for the purpose of promotion.









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#### 1823 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th JUNE, 2018

	6.	Rescue Superintendent (BPS-18)	(i) At least Second Class Bachelor's Degree in Mining Engineering from a recognized University:  (ii) First Class Mine Manager Certificate of Competency granted under the provision of the Mines Act 1923; and	28 to 40 years	By promotion, on the basis of seniority-cum-fitness, from amongst the Instructors and Inspectors of Mines with at least five years services as such and having First Class Mine Manager Certificate of Competency granted under the provision of the Mines Act 1923:  Provided that if no suitable person is available for promotion then by transfer or initial recruitment.
			(iti) At least seven years experience in mining.		Note: A joint seniority list of Inspectors of Mines and Instructors shall be maintained for the purpose of promotion
,	7.	Inspector of Mines (BPS-17)	At least Second Class Bachelor's Degree in Mining Engineering from a recognized University.	21-to 35 years	By initial regruitment
	*8.	Instructor (BPS-17)	At least Second Class Bachelor's Degree in Mining Engineering from a recognized University.	21 to 35 years.	(a) Fifty percent (50%) by promotion, on the basis of seniority-cum-fitness, from amongst the Rescue Supervisors having at least three years services as such; and  (b) Fifty percent (50%) by initial recruitment.
	9.	Assistant Director (Admn) (BPS-17)	At least Second Class Master's Degree in Business Administration. Public Administration. Commerce or Bachelor of Studies (4 years), Bachelor of Business Administration (Honrs) or equivalent qualification from a recognized University.	21 to 35 years.	By initial recruitment.
	10.	Assistant Director (Budget & Account) (BPS-17)	At least Second Class Master's Degree in Master of Business Administration(Finance). Master of Commerce or equivalent qualification from a recognized University.	21 to 35 years.	By initial recruitment.





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#### KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 25th JUNE, 2018

		• • • • • • • • • • • • • • • • • • •	<del></del>	<u>,                                     </u>
11	Statistical Officer	At least Second Class Master's Degree in		By initial recruitment.
	(BPS-17)	Statistics. Economics, Mathematics or equivalent	years.	
		qualification from a recognized University,		
12.	Suna-at-adams		<del> </del>	
12.	Superintendent (BPS-17)	••••	*****	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographers with at least five years services as such
				Note: A joint seniority of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion to the post of Superintendent:
	·			Provided that when the date of continuous appointment of an Assistant and Senior Scale
			<b>[</b>	Stenographer is the same, the Assistant shall be deemed to be rank senior to the Senior Scale Stenographer.
13.	Rescue Apparatus	At least Second Class three years Diploma in	21 to 32	By initial recruitment.
İ	Technician	Mechanical Technology from a recognized Board	years.	
1.5	(BPS-16)	of Technical Education with two years experience	,	
		as such.	•	
14.	Rescue Supervisor	At least Second Class Bachelor's Degree in	22 to 32	By initial recruitment.
	(BPS-16)	Mining Engineering from a recognized University.	years.	by amounteerstances.
15.	Secretary Mines		****	By promotion, on the basis of seniority-cum-fitness,
	(BPS-16)		,	from amongst the Project Mechanics with at least three years service as such.
16.	Senior Scale	(i) At least Second Class Bachelor's Degree or	21 to 32	By promotion, on the basis of seniority-cum-fitness, from
	Stenographer (BPS-16)	equivalent qualification from a recognized University;	years.	amongst the Stenographers with at least five year service as such:



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		(ii) a speed of seventy (70) words per minute in shorthand in English and forty five (45) words per minute in typing: and (iii) Knowledge of computer in using MS Word, MS Excel.		Provided that if no suitable person is available for promotion then by initial recruitment.
17.	Assistant (BPS-16)	At least Second Class Bachelor's Degree from a recognized University.	20 to 32 years.	(a) Seventy five percent (75%) by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with at least five years service as Junior Clerk and Senior Clerk  Provided that if no suitable person is available for promotion then by initial recruitment; and  (b) Twenty five percent (25%) by initial recruitment.
18.	Computer Operator (BPS-16)	(i) At least Second Class Bachelor's Degree in Computer Science, Information Technology, Bachelor's of Computer Science (BCS) (4 years). Bachelor's of Information Technology (BIT) (04 years) or equivalent qualification from a recognized University, or a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.	18 to 32 years	By initial recruitment.
19	Project Mechanic (BPS-15)	At least Second Class three years Diploma in Flectifical or Mechanical Engineering from a recognized Board of Technical Education with one year experience in the relevant field.	31 to 32 years.	By initial recruitment

	20	Stenographer (BPS-14)	(i) At least Second Class Intermediate or equivalent qualification from a recognized Board:		By initial recruitment
			(ii) a speed of fifty (50) words per minute in shorthand in English and thirty five (35)words per minute in typing; and		
			(iii) knowledge of computer in using MS Word, MS Excel.		
	21.	Senior Clerk (BPS-14)			By promotion, on the basis of seniority-cum-fitness from amongst the Junior Clerks with at least two years service as such.
· i	22.	Medical Technician (BPS-12)	(i) At least Second Class Secondary School Certificate with Science from a recognized Board;	21 to 32 years	By initial recruitment.
			(ii) Certificate of Medical Technician from a recognized medical faculty; and		
			(iii) Two years experience in the relevant field.		
;	23.	Surveyor (BPS-12)	At least Second Class Diploma of Associate Engineering in Civil Technology from a recognized Board of Technical Education.	18 to 30 years.	By initial recruitment
	24.	Junior Clerk (BPS-11)	(i) At least Second Class Secondary School Certificate or equivalent qualification from a recognized Board; and	18 to 32 years.	(a) Thirty three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Daftaris, Qasids, Naib Qasids and holders of other equivalent
儿			(ii) A speed of thirty (30) words per minute in typing.		posts with two years service as such and who have Second Class Secondary School Certificate from a

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	1		Τ	
				(b) Sixty seven (67%) percent by initial recruitment:
				Note: For the purpose of promotion, a joint sentority list of Daffaris. Qasids. Nath Qasids and holders of other equivalent posts shall be maintained with reference to the dates of their acquiring the Secondary School Certificate:
İ				Provided that-
				(a) If two or more officials have acquired the Secondary School Certificate in the same session, the inter-seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and
				(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
25.	Store Keeper (BPS-09)	At least Second Class Secondary School Centificate or equivalent qualification from a recognized Board with one year experience as Store Keeper	18 to 30 years.	By initial recruitment.
26.	Crew-Man (BPS-07)	(i) At least Second Class Secondary School Certificate with Science from a recognized Board, and	18 to 30 years.	By initial recruitment
		(ii) Mine Sirdar's Certificate granted under the Coal Mine Regulation, 1926:	•	



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			1	
		Provided that preference shall be given to the candidate, having experience in rescue and recovery as rescue apprentice at any recognized Mines Rescue and Safety Station.		
2.7.	Tube-Well Operator (BPS-6)	At least Second Class Secondary School Certificate from a recognized Board.  Note: Preference shall be given to the candidate, having some experience in Tube-well operations.	18 to 40 years.	By initial recruitment
28.	Driver (BPS-06)	(i) Literate; and  (ii) having a valid HTV/LTV Driving License issued by competent authority provided that preference will be given to those who have sufficient experience in driving repairing and maintenance of vehicle.	18 to 40 years.	By initial recruitment.
29.	Daftri (BPS-04)			By promotion, on the basis of seniority-cum-fitness, from amongst the Matriculate Qasids and Naib Qasids with at least three years' service.
30.	Qasid (BPS-04)			By promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids.  Note: A Joint seniority list of Naib Qasids of all the regional offices shall be maintained by the Inspectorate of Mines (Admin Section) Headquarters' Office Peshawar.
31,	Naib Qasid (BPS-03)	Literate.	18 to 40 years.	By initial recruitment





Attendant (BPS-03)  Dak Runner (BPS-03)  Chowkidar (BPS-03)  Mali (BPS-03)  Mali (BPS-03)  Sweeper (BPS-03)  Sweeper (BPS-03)  Cook Literate with three years practical Experience in 18 to 40 years.  Years  By initial recruitment.	33	Farash (BPS-03)	Destarish Lateral	10 10	
Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Sweeper (BPS-03)   Preferably Literate   Sweeper (BPS-03)   Sweeper (BPS-		ratasii (Br 3-03)	Preferably Literate	18 to 40 years	By initial recruitment
Chowkidar (BPS-03)   Literate with sound physique   18 to 40   By initial recruitment.	34		Preferably Literate	l i	By initial recruitment
(BPS-03)  Mali (BPS-03)  Mali (BPS-03)  Sweeper (BPS-03)  Preferably 1 iterate (BPS-03)  Cook  Literate with three years practical Experience in 18 to 40 years.  By initial recruitment.	35		Preferably Literate	1 1	By initial recruitment.
(BPS-03) Mali.  Sweeper (BPS-03)  Cook Literate with three years practical Experience in 18 to 40  By initial recomment years.  By initial recomment years.  By atial recomment att.	36.		Literate with sound physique	1 1	By initial recruitment
(BPS-03)  years.  29. Cook Literate with three years practical Experience in 18 to 40  By atial recruit ant.	37	•		l !	By initial recruitment.
I ammend the following the fol	38	-	Preferably 1 iterate		By initial recontinent
(8PS-03) Any Hotel or Guest House as Cook years.	39,	Cook (BPS-03)	Literate with three years practical Experience in any Hotel or Guest House as Cook	l ş	By atial recruit at.

**SECRETARY TO** GOVFRN' LENT OF THE KHYBER PAKHTUNKHWA MIP ZRALS DEVELOPMENT DEPARTMENT.





# TENTATIVE SENIORITY LIST OF THE ASSISTANTS/SENIOR SCALE STENOGRAPHER (BPS-16) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Assistant

**= 20** 

Senior Scale Stenographer (BPS-16) = 1

= 13

Sr.	Vacant = 13  Name of Officer/Oficial	Date of Birth	Date of 1st entry into Government	Regular to	appointme the prese	nt/promotion nt post	Present appointment	Remarks
No.	with Academic Qualification	with Domicile	Service	. Date	aps	Method of Rect!/Apptt:	with date	9
		3	4	5	6	7		
1	2	12.04.1962	20 10 1982	11.01.1994	16	By promotion	11.01.1994	•
^	Mr. Fazii Malik Assistant (Matric)	Mardon 01,08,1972	23.07.1995	23.07.1995	16	By initia	23.07.1995	
2	Mr. Muhammad Ishaq Assistant (M.A)	Karak		25.07.1996	16 -		25.07 1996	
3	Mr. Muhammad Zubair Assistant (B.A)	n1.03.1961 Mansehra	25.07.1996	, ´	16	By promotion	17.05 2010	
4.	Mr. Muhammad Riaz Assistant (F.A)	15.05.1970 Mardon	06.06.1988	17.05.2010		<b>2, p</b>	16.04.2012	
. 5	Mr. Rahatullah	13.07.1964 Peshawar	16.11.1982	16.04.2012	16		10,54.2512	S
	Sr. Scale Stenographer (Matric)		01.12.1987	01.06.2012	16	v	01.06:2012	
6	Mr. Ishtiaq Ahmed Assistant (Matric)	20.12.1959 Peshawar			16	Ar .	10.11.2017	
2,7	Mr. Faroog Shah	06.01.1970 Peshawar	25.08.1991	10.11.2017		.,	10.11.2017	
8		01.10.1968 Khyber Agency	01.03:1995 -	10.11.2017	16	· :	10.11.2011	
	B.A.	• =					•	

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### TENTATIVE SENIORITY LIST OF THE JUNIOR CLERKS (BPS-11) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31,12,2017

Total sanction posts = 22

Vacani = 3

				-				
Sr. No.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government	1	r appointr to the pre	nent/promotion sent post	Present appointment	Remarks
	Qualification		Service	Date	BPS	Method of Rectl:/Apptt:	with date	
<u>1</u>	2	, 3	4	5	6	7	8 .	9
!	Mr. Mohd Naeem Farooq F.A.	01.04/1962 D.J.Khan	01.07.1987	01.11.2002	. 11	By adjustment	01.11 2002	
√2	Mr. Waqas Ali Shah F.A.	10.08 1988 Swabi	03.06.2010	03.06.2010	. 11	By initial	03.06.2010	
3	Mr. Adnan Roshid Matric	22.03.1984 Haripur	23.05.2008	03.06.2010	Ħ	n	03.06.2010	
. 4	Mr. Muhamamd Fayyaz Malric	20.12.1972 Peshawar	17.07.1994	30.06.2011	11	By Promotion	30.06.2011	
5	Syea Bagh: Shah Matric	01.01,1972 Buner	18.08.1993	01.07.2011	11	By promotion	01.07.2011	
6	Mr. Asif Ali Khan D.Com.	03.04.1990 Bannu	25.02.2012	25.02.2012	. 11	By inilial	25.02.2012	.•
7	Mr. Islam Pervez B.A.	01.06.1974 Dir	28.02.2012	28.02.2012	. 11	u ·	28.02.2012	
8	Muhammad Nasar F.A	10.04.1976 Swa1	13.04.2007	07.01.2014	- 11	By promotion	07.01.2014	





Ś	Musiala B A	10 11 1988 Mohmand Agency	O 37 2017	15 12 2017	***	8y indraf	15 12.2017
	Haroon Rasheed B.A	05 01 1995 Nowshera	15.12.2017	15.12.2017		By initial	15 12 2017
11	Wajed ur Rohman B A	15.05.1995 North Waziristan Agency	15.12.201 <i>7</i>	15.12.2017	1;	By initial	15.12 2017
12	Waqas Bilal BS (Hons)	14.08.1994 Bannu	18 12.2017	18 12.2017	* ****	By inthal	18 12 2017
13	Allan M8A	18 04 1986 Karak	20.12.2017	20.12.2017	1.	By initiat	20.12.2017
14	Waleed Ralique BBA (Hans)	17.08.1992 Mansehra	20.12.2017	20.12.2017		8y inihal	20.12.2017
15	Wajihud Din BS (Software Engineering)	27.02.1993 Malakand	21.12.2017	21.12.2017	ţţ	By initiat	21.12.2017
16	Muhammad Afzaal MBA	23.11.1986 Abbottabad	26.12.2017	26.12.2017		By initial	26.12.2017



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### TENTATIVE SENIORITY LIST OF THE DRIVERS OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

· Sr.	Total sanction posts = 25  Name of Officer/Official	Vacant = 15  Date of Birth	Date of 1st entry into Government	Regular I	appoinime the prese	ent/promotion ent post	Present appointment	Remarks
No.	with Academic Qualification	with Domicile	Service	Date	895	Method of Rectt:/Appti:	with date	9
i			<del>                                     </del>	5	6	7	8	Υ
1/	2	3	12.10.1992	14.09.1993	6	By initial	14 09,1993	
√ı	Mr. Fazale Azim D.Com Muhammad Rafiq	01.05.1965 Mardan 07.04.1963	01.12.1992	14.09.1993	6	"	14.09.1993	
2	*****	Abbottabad N 01.07.1967	01.12.1992	14.09 1993	6	н	14.09.1993	•
3	Mr. Ghunchak 	Swat	• 07.04.1993	14.09 1993	6	36 1	14.09 1993	
4	Mr. Abdul Salam	01.02.1967 Peshawar		•	,		03.04.1995	
5	Mr. Naik Zada	01 07.1968 Swa1	21.10.1993	03.04 1995	· 6			
6	Mr. Zameer Hussain	01.07.1968	27.09.1995	27 09.1995	. <b>6</b> .	•	27 09.1995	
. 7	Muhamamd Wisal	D.I.Khan 14.08.1966	21 10.1996	21.10.1996	6		21.10.1996	
		Peshawar 24.04.1974	31.12.2008	31.12.2008	6		31 12.2008	
. 8	Mr. Muhammad Ali 8.A.	Charsadda	21.11.2011	21.11.2011	6	•	21.11.2011	
9	Muhammad Alif Afridi F.A.	12.05.1987 Peshawar	•	21.11.2011	- 6		21.11.2011	•
10	Mr. Wakil Khan Malric	14.11.1980 Nowshera	21.11.2011	21.11.2011				





### TENTATIVE SENIORITY LIST OF THE NAIB QASIDS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Total sanction posts = 17 Vacant = 2

٠. د.	Name of Officer/Oficial with Academic	Dale of Birth with Domicile	Date of 1st entry into Government	. –	r appointm to the press	ent/promotion ent post	Present appointment	Remarks
0.	Qualification		Service	Date	BPS	Method of Rectt:/Appti:	with date	
1	2	3	4	5	6	7	8	9
- 1	Mr. Azım Khan	01.07.1960 Peshawar	19.06.1989	14 08,1990	4	By Initial	14.08.1990	
2	Mr. Jehanzeb Khan-l	01.07.1966 Peshawar	19.08.1990	19.08.1990	4 .	By Initial	19.08 1990	
3	Mr. Abdul Wadood Malric	11.04.1975 Karak	14.09.1993	14.09.1993	4	By Initial	14.09.1993	
4	Mr. Muhammad Zulfiqar 	01.07,1973 D.I Khan	17.09.1995	17.09.1995	4	By Initial	17.09.1995	
<b>.</b>	Mr. Khan Muhammad Matric	05.05.1974 Swal	20.08.1995	13.12 2005	4	By Initial	13 12 2005	
5	Mr. Rashid Khan Matric	30.01.1974 Nowshera	29.12 2008	29.12.2008	3 .	By Initiat	29.12.2008	
, <b>y</b> 	Mr. Muhammad Bashir Matric	05.04.1988 Nowshera	31.12.2008	.31.12.2008	3	By Initial	31.12.2008	
i.	Mr. Yousaf Khan-II	01.07.1964 Peshawar	24.11.1996	25.03 2010	3	By Initial	25.03.2010	
Ž	Mr. Jehanzeb-II	12.03.1985 Peshawar	19.11.2011	19.11.2011	3	By Initial	19.11.2011	``

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		Date of Birth	Dale of 1st entry into	Regular appointment/promotion  to the present post			Present appointment with date	Remorks
· , \	Name of Officer/Official with Academic	with Domicile	Government Service	Date	BPS	Method of Rectt:/Appti:	Will date	9
"	Qualification				<del></del>	7	8	<u></u>
1			4	5	6			
-	2	3			3	By Initial	01 07.2012	-
		13 03.1990	01,07,2012	01.07.2012	3			•
ø	Mr Shahab Ali	Swabi				- ·	08.01.2013	
•	B.A	) F D4 1089	08 01.2013	08.01.2013	3 .	By Initial	00 01.2010	-
1	Mr. Muhammad Shoaib	15.04 1989 Mardan						
·	.Matric		14 01 2013	14.01.2013	3	By Initial	14.01.2013	•
12	Syed Mustala	30 05.1987	•	-	•	٠.		
12	7th Class	Buner		01.07.2014	3	By Initia	01.07.2014	
		30.06.1989	01.07.2014	01,07,2014		•	•	٠
13	Muhammad Shakeel-ur-Rahamn	Khyber Agency	•		•		29.10.2014	•
	M.Sc (Economics)		29.10.2014	29.10.2014	3 (	By Initial	2	•
	Mr. Najeeb ur-Rahman	01.01.1987	27,10.20					
14		Peshawar			3	By Initial 😘	19.08.2015	Cadre change 19.08.2015
		19.04.1981	17.08.2010	17.08.2010	J	- •		17.00.2015
15	Mr. Sajid Khan	Peshawar .		-	•			
	Middle	, <del></del>				-		•





### TENTATIVE SENIORITY LIST OF NAIB QASID/CHOWKIDAR/SWEEPER/MALI ETC(WHO BAVE PASSED MATRIC) WORKING IN INSPECTORATE OF MINES KYBER PAKHTUNKHWA AS SOOD OB 31.12.2017

\$r. No.	Nome	Designation	Dale of Birth	Domicile	Qualification	Date of 1st entry into Government Service	Date of entry into present post	Year of possing Mairic Exam	Remarks
	when with the control of the control	w has a second management	4			The second secon	8:	9	10
1.	Mr. Abdul Wadood	Naib Qasid	11.04 1975	Karak	Matric	14.09 1993	14.0# 1993	04 08 1994	The security of the section of the s
2	Mr. Muhammad Adalat	Chowkidar	04.01 1962	Monsehra	Malnc	31.08.1995	31 0211995	07.03 1978	
3	Mr. Khan Muhammad	Naib Qasid	05 05 1974	Swat	Matric	20.08 1999	13.122005	15.04 2015	Cader charge on 13.12/2005
4	Mr Shoold Ali	Malı	05.03.1980	Peshawar 🖔	Mainc	26 12 2008	76.12.708	24.12 1997	
5	Mr. Roshid Khan	Naib Qasid	30 01 1974	Nowshera	Matric	29.12 2008		25.07.1992	
6	Mr. Muhammad Bashir	Naib Gasid	05:05.1988	Nowshera	Mairic	31 12 2008	31.122008	6.06.2010	
1	Mr Shahab Ali	Naib Qosid	13 03 1990	Swabi	B A.	01.07.2012	01.07.2012	24.06.2006	
8	Mr. Muhammad Shoolb	Naib Qasid	15 04 1989	Mardan	Matric	08 01,2013	08 01:2013	20.10.2006	•
9 -	Mr. Jamshed Ali	Chowkidar	16.06.1979	Swot	Mairic	10.01.2013	09.092015	20.06.2016	Cadarahanan
01	Mr Anwar Chund 🕏	Sweeper	04 08 1990	Kohal	B.A.	14 01,2013	14.01.2013	30.06.2006	Cader change on 09,09,2015
11	Mr. Ageel Samso I	Sweeper	08 04 1990	Peshawar	F.A	26 06.2013	26 06 2013	10.08.2007	
12	Muhammad Shokeel-ur-Rehman	Naib Qasid	30.06 1989	Knyber Agency	M.Sc.	01.07.2014	01.07.2014	30.06.2006	
13	Haroon Badshah	Chowkidar	03.09 1979	Karak	Matric	<b>25.05</b> 2017	25 05 <b>201</b> 7	1996	





## TENTATIVE SENIORITY LIST OF NAIB QASID/CHOWKIDAR/SWEEPER/MALI ETC(WHO HAVE PASSED MATRIC) WORKING IN INSPECTORATE OF MINES KYBER PAKHTUNKHWA AS SOOD ON 31.12.2017

\$r. No.	Name	Designation	Dale of Birth	Domicile	Qualification	Date of 1st entry into Government Service	Date of entry into present post	Year of passing Matric Exam	Remarks
<del>-</del>	2	3	4	5	6	7	8		
1	Mr. Abdul Wodood	Noib Gosid	11.04.1975	Karak	Matric	14.09.1993	14.09 1993	04.08 1994	10
	Mr. Muhammad Adalat	Chowkidor	04.01.1962	Mansehro	Matric	31.08.1995	31.08.1995	07.08.1978	••
3	Mr Khan Muhammad	No b Qosid	05 05,1974	- Swal	Malric	20.08.1995	13.12.2005	15.06.2015	Codor channel
4	Mr Shoaib Ali	Mal	05 03 1980	Peshawar	Matric	26.12.2008	26.12.2008		Cader change on 13.12.2005
۲.	Mr. Rashid Khan	Narb Qorid	30 01.1974	Nowshera	Matric	29.12.2008	29.12.2008	24.12.1997 25.07.1992	. · · · · · · · · · · · · · · · · · · ·
	Mr. Muhammad Bashir .	Noib Qasid	05 05 1988	Nowshera	Mairic	31.12.2008	31.12.2008	16.06.2010	
	Mr Shahab AE	Naib Qas d	13 03 1990	Swabi	. B.A.	01.07.2012	01.07.2012	24.06.2006	
	Mr. Muhammad Shaaib	Noib Gasid	15.04.1989	Mardan	Matric	08.01.2013	08.01.2013	20.10.2006	
	Mr. Jamshed Ali	Chowkidar	16.06 1979	Swat	Matric	10.01.2013	09.09.2015		
10 /	Mr. Anwar Chund	Sweeper	04.08 1990	Kohot	S.A,	14.01.2013	,	20.06.2016	Cader change on 09 09 2015
11 /	Ar. Ageel Samsoil	Sweeper	08.04 1990	Peshawar	F.A		14.01.2013	30.06.2006	
15. V	Auhammad Shakeel-ur-Rehman	, Naib Qasid	30.04 1989	Khyber Agency	M.Sc.	26.06.2013	26.06.2013 01.07.2014	10.08.2007	
13 н	loroon Badshah	Chowkidar	03.09.1979	Karak	Molris	25.05.2017	25.05.2017	30.06.2006	





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## TENTATIVE SENIORITY LIST OF THE CHOWKIDARS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Total sanction posts = 9 Vacant = 2

Sr.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government		r appointm to the pres	nent/promotion ent post	Present appointment	Remarks
No.	with Academic Qualification	. Willi Dollingue	Service	Dale	BPS	Method of Rectt:/Appti:	with date	
<b>-</b>	2	3	4	5	6	7	8	9
i .	Muhammad Adalat	04.01.1962 - Mansehra	31.08 1995	31,08,1995	3	By Initial	31.08.1995	
1/2	Matric  Muhammad Qaisar	05.04.1977 Swabi	02.04.2001	01.02.2002	3	By Initial	01.02.2002	
3	Mr. Mohi Room	01.07.1982 Buner	12.04.2004	23.07.2005	. 3	By Initial	23.07.2005	
4	Muhammad Rafiullah Khan	01.04.1965 D.I.Khan	01.11.2007	01.11.2007	3	By Initial	01.11.2007	•
· 5	Mr. Shad Muhammad	1977 Nowshero	29.12.2008	29.12.2008	3	By Inilial	29.12.2008	
6	Mr. Sajid Muhammad	11.10.1984 Nowshera	29.12.2008	29.12.2008	3	By Initial	29.12.2008	
7	Mr. Jamshed Ali	16.06.1979	10.01.2013	10.01.2013	3	By Initial	09.09.2015	Cadre change 09.09.2015
8	Matric Haroon Badshah Matric	Swa! 03.09.1979 Karak	25.05.2017	25.05.2017	3	By Initial	25.05.2017	- 1 ·





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### TENTATIVE SENIORITY LIST OF THE NAIB QASIDS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Total sanction posts = 17 Vacant = 2

5r. 10.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government Service		o the pres	enl/promotion ent post	Present appointment	Remarks
	Qualification			Dale	aps	Method of Rectl:/Apptl.	with date	· .
1	2	3	4	5	. 6	7	8	9
1	Mr. Azim Khan	01.07 1960 Peshowar	19.06.1989	14.08 1990	4	By Initial	14,08.1990	4.
2	Mr. Jehanzeb Khan-l	01.07.1966 • Peshawar	19.08.1990	19.03,1990	. 4	By Initial	19.08 1990	
3	Mr. Abdul Wadood Malric	11.04.1975 Karak	14.09.1993	14.09.1993	4	By Initial	14.09,1993	
4	Mr. Muhammad Zulfiqar	01.07.1973 D.J.Khan	17.09,1995	17.09.1995	4	By Initiat	17.09.1995	· .
5	Mr. Khan Muhammad Malric	05.05.1974 Swal	20.08.1995	13.12.2005	4	By Initial	13.12.2005	•
6 .	Mr. Rashid Khan Matric	30.01,1974 Nowshera	29.12.2008	29.12.2008	3	By initial	29.12.2008	
7	Mr. Muhammad Bashir Matric	05.04,1988 Nowshera	31.12.2008	31.12.2008	3	. By Initial	31.12.2008	
3	Mr. Yousaf Khan-II	01.07.1964 Peshawar	24.11.1996	25.03.2010	3	By Initial	25.03.2010	
7 .	Mr. Jehanzeb-II Middle	12.03.1985 Peshawar	19,11,2011	19,11.2011	3	By Initial	19.11.2011	



<i>ــد</i> ،		Dale of Birth	Date of 1st entry into	Regular appointment/promotion to the present post		Present appointment with date	Remarks	
	Name of Officer/Official with Academic	with Domicile	Government Service	Date	BPS	Method of Rectt:/Appti:		9
	Qualification					7	8	
		3	4	. 5				
二	2	13 03 1990	01 07.2012	01 07.2012	3	By Initial	01 07 2012	٠,
0	Mr. Shahab Ali B.A	Swabi			2	By Initial	08 01.2013	
	Mr. Muhammad Shooib	15.04,1989	08.01.2013	08.01.2013	3			
<i>y</i>	Mainc	Mardan	14.01 2013	14.01.2013	3	By initial	14.01 2013	
12	Syed-Mustala	30.05.1987		•				
12	7th Class	Buner	01.07.2014	01.07 2014	3	. By Initial .	01.07.2014	
13	Muhammad Shakeel-ur Rahamn	~ 30.06.1989 Khyber Agency			•	•	29.10.2014	
	M.Sc (Economics)	01.01.1987	29.10.2014	29.10.2014	3	By Initial	27,10.2014	
14	Mr. Najeeb-ur Rahman	Peshawar	,		•	a 1 22-1	19.08.2015	Cadre change
	<del></del>	19.04.1981	17.08.2010	17,08 2010 .	3	3 By Initial	17.00.20.0	19.08.2015
15	Mr. Sajid Khan	Peshawar				•		

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## TENTATIVE SENIORITY LIST OF THE SWEEPER (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2017

Sweeper = 5 Vacant = 1

- r.	Name of Officer/Oficial	Date of Birth	Date of 1st entry into Government	Regular appointment/promotion to the present post			Present appointment	Remarks
о.	with Academic Qualification	with Domicile	Service	Date	BPS	Method of Rectl:/Appti:	with date	· .
			4	5	6	7	8	
1	2 Mr Hazrat Usman	01.01.1991	17.8.2010	17.8.2010	3	By Initial	17.8.2010	
2	Mr. Arwan Chund	Nowshera 04.08.1990	14.01.2013	14.1.2013	3 °	By Iniliat	14.1.2013	
_	B.A.	Kohal	26.06.2013	26.06.2013	3	By Initial	26.06.2013	
3	Mr. Ageel Samsoil F.A.	Peshawar 01.01.1989	08.01.2013	8.1.2013	3	By Initial	8.1.2013	
4.	Mr. Sagar	Mardan						·





### TENTATIVE SENIORITY LIST OF THE JUNIOR CLERKS (BPS-11) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12,2018

Total sanction posts

24 .3

Vacant

Sr.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government Service	_	ppointmen he presen	nt/promotion t post	Present appointment	Remarks	
No.	Qualification			.Date	BPS	Method of Recit:/Appit:	with date		
<del></del>	2	3	. 4	5	6	7	8	9	
1	Bilal Mustafa B A	10.11.1988 Mohmand Agency	15.12.2017	15.12 2017	11	By init a	<b>15 12.2</b> 317		
2	Horoon Rasheed B.A	05.01.1995 Nowshera	15.12 2017	15.12 2017	11	By initial	15 12 2.87	·,	
3	Wojed ur Rohman B.A	15.05.1995 NW Agency	15.12.2017	15.12.2017	. 11	By initial	15 12 2017		
4	Waqas Bilat BS (Hons)	14 03.1994 * Bannu	18.12 2017	18 17 2017	11	By initia	18 1 · 2017		
5	Alfon MBA	18.04.1986 Korok	20.12 2017	20.12.2017	11	By initial	20 12 2017	٠,	
6	Waleed Rafique BBA (Hons)	17.03.1992 Mansehro	20.12.2017	20.12.2017	11	By initial	20 12 2017	· ·	
7	Muhammad Afzaal MBA	23.11.1986 Abbottebed	26.12 2017	26.12.2017	П.	By initial	26 12 2017		
8 .	Mr. Sohail Ahamd F.A	24.04.1988 Nowshera	07.03.2018	07.03.2018	11 .		07.03 2018		



			07.03.2018	07.03.2018	13		07.03.2018
9	Mr. Muhammad Taligeer	02 03 1989	07.03.2010	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
	FA	Nowshera		01.10.2018	11	By Promotion	01 10 2018
10	Mr Abdul Wadood	- 11 04,1975	14.09 1993	01.10.2016	••	<b>U</b> ,	·
	Maine	Karak		A1 10 0010	11		01 10.2018
ίι	Mr Shootb All	05 03 1980	24 12 2008	01.10.2018			4
•	Motric	Peshawar				p. r	01 10-2018
12	Mr. Rashid Khan	30 01 1974	29 12 2008	29.12.2008	11		J. 15 A-15
1.5	Mainc	Nowshera					G1.10.2018
13	Mr. Muhammad Bashii	05.04 1988	31.12 2008	01.10.2018	ji –		. 01.10.2010
13	Molric	Nowshera		٠.			01.10.2018
	Mr Shohab Ali	13 03 1990	01.07.2012	01,10,2018	11		U1.10.2016
14/		Swab:		-			
	Mr. Arwan Chund	04.08 1990	14.01-2013	01.10.2018	· 11	•	01.10.2018
15		Kohal					
	B,A.	21 02 1772	01,10.2018	01,10.2018	11	By Initial	01.10.2018
16	Mr "hah Fahad	Peshawar		•			
	M Sc Computer Science	15.02 1996	01.10.2018	01.10.2018	11		01 10.2018
₹7	Mr Saeed Ullah	FR 8annu	01.10.20.0				
	B.A ~		02 10.2018	02.10.2018	11		02.10.2018
18	Mr Muhammad Zubair	11,03 1995	02 10.2010	02.10.2010		• •	
	M.Com	Peshawar	02,10.2018	02.10.2018	. 11		02.10.2018
19	Mr. Murad Ahmad Shah	01.12 1997	02,10.2016	02.10.2010	• • •		
	B.com	Batagram		01.12.2018	11	By Promotion	01.12.2018
20	M. Shakee -ur-Rahamn	30.06 1989	01 07.2014	01.12.2015	.,	<b>-</b> / ( · · · · · · · · · · · · · · · · · ·	
	M Sc (Economics)	Khyber Agency	,		11	By Promotion	01.12.2018
21	Mr. Khari Muhammad	05.05.1974	20 08 1995	01.12.2018	11	Dy 110111011011	
	Matric	Swot	•				



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### TENTATIVE SENIORITY LIST OF THE SENIOR CLERKS (8PS-14) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12,2018

Total sanction posts Vacant

Sr.	Name of Officer/Oficial with Academic	Dale of Birth with Domicile	Dale of 1st entry into Government	Regular appointment/promotion to the present post			Present appointment	Remarks
No.	Gnaliticațion Altu Vcadewic	wint politicité	Service	Dole	BPS	Method of Rectt:/Appti:	with date	
· 1	2	3	4	5	6	7	8	9
1/	Mohd Naeem Farooq F.A.	01.04/1962 D I.Khan	01 07 1987	01.01.2018	14,	By Promotion	01.01 2018	
$\sqrt{2}$	Mr. Waqas Ali Shah F.A.	10 08 1988 Swabi	03.06.2010	01.01.2018	14	•	01.01.2018	
3	Mr. Adnan Rashid Matric	22 03.1984 Haripur	23.05.2008	03.06.2010	14	ee	02-01-2018	
4	Muhamamd Fayyaz Matric	20.12.1972 Peshawar	17.07.1994	02.01.2018	14		02.01.2018	
5	Syed Boghi Shah Matric	01 01,1972 Buner	18.08.1993	01,01,2018	14		01.01.2018	٠.
6	Mr. Asif Ali Khan D.Com.	03 04.1990 Bannu	25.02.2012	28.05.2018	14	#	28.05,2018	
. 7	Mr. Islam Pervez B.A.	01.06.1974 Dir	28.02.2012	30.05.2018	14	<b></b>	30.05.2018	
8	Muhammad Nasar F.A.	10.04.1976 Swat	13.04.2007/	01.10.2018	14	•	01.10.2018	





#### TENTATIVE SENIORITY LIST OF THE DRIVERS OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts Vacant

27 1

Šr.	Name of Officer/Oficial with Academic Qualification	Date of Birth with Domicile	Date of 1st entry into Government	Regular appointment/promotion to the present post			Present appointment	Remarks
No.			Service	Date	BPS	Method of Rectt:/Apptl	with dale	· · ·
1	2	3	4	5	6	7	8	9
<del></del>	Mr. Fazale Azım	01.05.1965	12.10 1992	14.09.1993	6	By initial	14,09,1993	
2	D.Com Muhammad Rafiq	Mardan 07.04.1963	01.12 1992	.14.09.1993	6		4 09 1993	
3	Mr. Ghunchak	Abbottabad 01.07.1967	01.12 1992	14.09.1993	. 6		14 09 1993	
4	Mr. Abdul Salam	Swat 01.02.1967	07.04 1993	14.09.1993	6	4	14.09 1993	
5	Mr. Naik Zada	Peshawar 01.07.1968	21.10.1993	03.04.1995	6	N.	03 04.1995	
6	Mr. Zameer Hussain	Swal 01.07.1968	27.09.1995	27.09.1995	6		27.09 1995	
7	—- Muhamamd Wisal	D.I.Khan 14,08,1966	21.10.1996	21.10.1996	ģ	# .	21.10.1996	•
8 .	Mr. Muhammad Ali	Peshawar 24.04.1974	31.12.2008	31.12.2008	<u>ه</u>		31 12 2008	
9	B.A. Muhammad Atıf Afridi	Charsadda 12.05.1987	21,11,2011	21.11.2011	6		21.11.2011	
10	F.A. Mr. Wakii Khan	Peshawar 14.11.1980	21.11.2011	21.11.2011	6	/ <b>*</b>	21 11.2011 -	· .
11	Motric Mr. Javid Akhtar	Nowsherd 03.01,1980	28.12.2017	28.12.2017	6		28.12.2017	
12	Malric Mr. Imran Khan	Peshawar 20.04.1989	01.01.2018	01.01.2018	. 6	-	01.01.2018	
'. 13	Mr. Sagib Shah Afridi	Lower Dir 01.08.1989	01.01.2018	01.01.2018	<b>6</b> ,	•.	01.01.2018	
,	F.A	Khyber Agency						



### TENTATIVE SENIORITY LIST OF THE DRIVERS OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts 27
Vacant 1

Sr. No.	Name of Officer/Oficial			Regular appointment/promotion to the present post			Present appointment	Remarks
140,	Qualification		Service	Dale	BPS	Method of Rectt:/Apptt.	with date	
1	2	3	4	5	6	7	8	9
_/	Mr. Fazale Azım	01.05 1965	J2.10.1992	14.09.1993	6 .	By initial	14.09 1993	
2	D.Com Muhammad Rafiq	Marda: 07.94 1943	01,12,1992	14.09 1993	6 .	•	- 14 09,1993	
. 3	Mr. Ghunchak	Abboltabad 0: 07,1967	01.12.1992	14.09.1993	. 6		14.09 1993	•
4		Swat 01.02 1967	07.04.1993	14.09.1993	6		14 09.1993	
5	— Mr. Naîk Zada	Peshawar 01.07 1968	21.10.1993	03.04.1995	6	. ,	03.04.1995	
6		Swat 01 07 1968	27.09.1995	27.09.1995	6		27.09.1995	
7	 Muhamamd Wisal	D I Khan I 4 08.1766	21.10.1996	21.10.1996	6	<u>.</u>	21.10 1996	
. 8	 Mr. Muhammad Ali	Peshawar 24,04,1974	31.12.2008	31.12.2008	6		31 12 2008	
9.	B.A. Muhammad Afif Afridi	Charsoddo 12 05 1987	21.11.2011	21.11.2011	6	•	21.11 2011	
10	F.A. Mr. Wakil Khan	Peshawar 14.11.1980	21.11 2011	21.11.2011	. 6		21.11 2011	٠.
11	Matric Mr. Javid Akhtar	Nowshera 03 01.1980	28.12.2017	28.12.2017	6 .		28.12.2017	
12	Matric Mr. Imran Khan	Peshawar 20.04.1989	01.01.2018	01,01,2018	6	n .	01.01.2018	
13	 Mr. Saqib Shah Afridi	Lower Dir. 01.08.1989	01.01:2018	01.01.2018	6	-	01.01.2018	•
	F.A	<ul> <li>Khýber Agency</li> </ul>			-			





	,						
14	Mr. I:a Ud Din	28 09 1982	02 01.2018	02.01 2018	6		02 01 2018
	Middle	Ch Irol		,	٠.		02.01 2018
15	Mr. Ejaz Noseem	01 01 1987	02 01.2018	02.01 2018	6	-	02.01 2010
	Middle	Karak · ·			,	-	02 01 2018
16	Mr. Maisam Hussain	24.03 1994	02.01.2018	02.01.2018	. <b>6</b>		02 01 2010
	Matric	Kuram Agency					03 01,2018
17	Mr. Abdur Rahim	14 02 1982	03 01.2018	03.01.2018	6		03 01.2010
	****	Mardan					02.01.2019
18	Muhammad Aril Afrid	28.03.1985	03 01 2018	03.01.2018	6		03 01 2018
	Matric	Peshawar :			٠.		. 41 0010
}9	Mr. Ahtasham Hafeez	13 03.1985	4,01,2018	4.01.2018	6		4.01.2018
• • •	F.A	Haripur					
20	Mr. Shah Jahan	10 04,1986	04.01 2018	04.01.2018	6	•	04.01.2018
, 20	Matric	D Khon			,		
21	Muhamma: Altaf Khan	15.01.1987	04 01,2018	04.01.2018	6	1.00	04.01 2018
. 21	Mairic	Lokki Marwat		• •			
22	Mr. Umer Shazad	19.04.1987	05.01.2018	05.01.2018	é		05 01.2018
22	F.A	Abboilabad					
23	Mr. Naeem Ullah	01.05.1986	26.01.2018	26.01.2018	6		26.01.2018
.23	D.Com	Lower Dir		42	•		
0.4	Mr. Waheed Ur Rehman	19.11.1980	07.03.2018	07.03.2018	6	*	07.03.2018
24	Mr. Wonesd of Refinant	Nowshero					٠.
	**************************************	16.04.1983	07 03 2018	07.03.2018	6		07.03,2018
25	, Mr. Abid U <sup>c</sup> ah	Chanadda	• • • • • • • • • • • • • • • • • • • •	•	•	·	
		04 08.1986	03.04 2018	03.04 2018	ć		03.04.2018
25	Mr Shafiq i'r Rehman	Kohistan	04.012010	<del>-</del>			
	Malr c .	KOHBIOH					





.14	Mr Zia Ud Din	28 09.1982	02 01.2018	02 01.2018	6		(2.01 0018
	Middle	Æ hitral					
15	Mr Eloz Naseem	01 01.1987	02 01 2018	02.01.2018	- 6-		92 01 2018
	Middle	Korak		•			
16	Mr. Maisam Hussain	24 03 1994	02.01.2018	02.01.2018	6		02 01 2018
	Maltic	Kuram Agency		•			
112/	Mr. Abdur Rahim	14.02.1982	03.01.2018	03.01.2018	6	. ,	63 01.2018
		Mordan			•		
18	Muhammad Aril Afridi	28.03.1985	.03.01.2018	03.01.2018	6		03.01.2018
٠	Matric	Peshawar	-	/		•	
19	Mr. Ahtasham Hafeez	13.03.1985	4.01.2018	4.01.2018	6	ŗ	4.01.2018
	F.A	Haripur			ė		-
20	Mr. Shah Jahan	10 04.1986	04.01 2018 /	04.01.2018	6		. 04.01.2018
	Matric	DI Khan	•	•		•	
21	Muhammad Altaf Khari	15.01.1987	04 01.2018	04.01.2018	6	• "	04 01.2018
	Matric	Lakki Marwat					
22	Mr. Umer Shazad	19.04.1987	05.01,2018	05.01.2018	6	* *	05 01.2018
-	F.A	Abboltabad				•	
23	Mr. Naeem Ulloh	01.05.1986	26.01.2018	26.01.2018	6		24.01.2018
	D.Com	Lower Dir					
24	Mr. Waheed Ur Rehman	19.11.1980	07.03.2018	07.03.2018	6	•	07.03 2018
		Nawshera				•	* 5
25	Mr. Abid Ullah	16.04,1983	07.03 2018	07.03.2018	6		07,03 2018
	****	Chorsodda					
26	Mr. Shafiq Ur Rehman	04.08.1986	03 04.2018	03.04.2018	6	•	03.04.2018
	Matric	Kohislan 📑					





### TENTATIVE SENIORITY LIST OF THE NAIB QASIDS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12,2018

Total sanction posts Vacant 28

Sr. No.	Name of Officer/Official with Academic	Date of Birth with Domicile	Date of 1st entry into Government	_	ppointme	nt/promotion at past	Present appointment	Remarks
,,,,	Qualification	, <u></u> ,	Service	Date	895	Method of Rectl:/Appti	with date .	
1	2	3	4	5	6	7	8	9
1	Mr. Azim Khan	01.07.1960 Peshawar	19 06 1989	14.08-1990	4	- By Initial	14.08.1990	
2	Mr Jehanzeb Khan I	01.07 1966 Peshawar	19 08 1990	19.08.1990	4	•	19.08.1990	
3	— Mr. Muhammad Zulfigar	01,07,1973 D.I.Khan	17.09.1995	17.09.1995	4		17 09.1995	• .
4	Mr. Yousal Khan-II	01.07.1964	24 11.1996	25.03.2010	3		25 03.2010	
5	Mr. Jehanzeb-II	Peshawar 12.03.1985	19,11,2011	19.11.2011	3	, ·	19.11.2011	
3/	Middle Mr. Muhammad Shooib	Peshawar 15:04 1989 Mardan	08.01.2013	08.01.2013	Š	· P .	08 01 2013	
7	Matric Syed Mustafa	30.05 1987	- 14 01.2013	14.01.2013	3		14 01.2013	
8	7th Class Mr. Nojeeb-ur-Rahman	8uner 01.01.1987	29,10.2014	29,10,2014	3	4.	29.10.2014	•
9 .	Mr. Sajid Khan	Peshawar 19.04.1981	17.08.2010	17,08.2010	3	٠	19.08.2015	Cadre change 19 08 2015
10	Middle Mr. Saeed Ullah	Peshawar 01.01.1982	03.01,2018	03.01.2018	3	<b>.</b>	03:01 2018	17 00 2013
11	Malric Mr. Rizwan Ullah	Swat 01.01.1983	03.01.2018	03.01.2018	3		03.01.2018	
12	Middle Mr. Muhammad hanif F.A	Peshawar 21.12.1983 Peshawar	03.01.2018	03.01.2018	3		03.01.2018	





### TENTATIVE SENIORITY LIST OF THE SWEEPER (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12.2018

Total sanction posts Vacant

12

Sr. No.	Name of Officer/Official with Academic	Date of Birth with Domicile	Date of 1st entry into Government	Regular appointment/promotion to the present post			Present appointment	Remarks
	Qualification		Service	Date	BPS	Method of Rectt:/Applt:	with date	
1	2	3	4	5	6	7	. 8	9
1	Mr. Hazrat Usman	01.01.1991 Nowshero	17.8.2010	17.8.2010	3	By Initial	17.8 2010	
2/	Mr. Sagar	01.01.1989 Mardan	08.01.2013	8.1.2013	<b>3</b> ·	*1	8.1.2013	
3	Mr. Aqeel Samoil F.A.	08.04.1990 Peshawar	26.06.2013	26.06.2013	. 3	,	26.06 2013	
4	Mr. Waqar	12.06.1990 Peshawar	04.01.2018	04.01.2018	3 ,	<b>.</b>	04.01.2018	
5	Mr. Ajay Kumar	06.09.1995 Peshawar	04.01 2018	04.01.2018	3	•	04.01 2018	
6	Mr. Sheheryor	07.11.1992	08.01.2018	08.01.2018	3		08 01.2018	
7	Mr. Ijoz Ahmad Malric	06.02.1996 Swat	09.01.2018	09.01.2018	3		09.01.2018	
8	Mr. Yasir Masih Middle	12.04.1984 Peshawar	11.01.2018	11.01.2018	. 3	*1	11.01.2018	
9	Mr. Inzer Riaz Masih Grad VI	1987 Peshawar	11.01.2018	11.01.2018	3	•• , •	11.01.2018	





### TENTATIVE SENIORITY LIST OF THE CHOWKIDARS (BPS-3) OF THE INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, AS STOOD ON 31.12:2018

Total sanction posts Vacant \_17 3

Sr. No.	Name of Officer/Oficial with Academic	Date of Birth with Domicile	Date of 1st entry into Government		ippointmer the presen	nt/promotion nt post	Present appointment	Remarks
	Qualification		Service	Oate .	BPS	Method of	_ with date	
1	2	3	4	5	6	7	8	9
<b>1</b>	Muhammad Adalat Matric	04.01.1962 Monsehra	31.08 1995	31.08.1995	3	By Initial	31.08 1995	
V	Muhammod Qaisar	05.04.1977 Swabi	02.04 2001	(a) 02 <b>.2002</b>	3	By Initial	01.02 2002	
3	Mr. Mohi Room	01 07.1982 Buner	12.04.2004	23.07.2005	<b>3</b>	By Initial	23.07.2005	
4	Muhammad Rafiullah Khan —	01.04.1965 D I Khan	01.11.2007	01 11.2007	3	By Initial	01.11.2007	
<b>5</b> .	Mr. Shad Muhammad	1977 Nowshera	29.12.2008	29.12.2008	3	By Inilia	29.12 2008	
6	Mr. Sajid Muhammad	11.10.1984 Nowshera	29.12 2008	29.12.2008	3	By Initia	29.12.2008	
7	Mr Jamshed Ali Malric	16.06.1979 Swat	10.01.2013	10.01.2013	3	By Inilia *	09 09 2015	Cadre change 09.09.2015
	Haroon Badshah Matric	03.09.1979 Karak	25.05.2017	28.05,2017	3	By Inilia	25.05.2017	

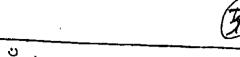




9	Mr. Karim Khan Matric	02.02.1979 Chilral	03 01.2018	03.01.2018	3	Eyerdis	03 01.2018
. 10	Mr. Abdullah Middle	01.01.1989 Peshawar	04.1.2018	04.01.2018		By Initial	O4.01.2018
11	Mr. Kalim Ullah Midale	25.12.1990 Peshawar	04 01.2018	04.01.2018	. 3	By Initial	04.01.2018
12	Mr. Wasim Ahmad Matric	01.01.1994 Peshawar	10.01.2018	10.01.2018		By Initial	10.01.2018
13	Mr. Shakir Ulfah	20 04 1987	07.03,2018	07.03.2018	2	By Initial	07.03.2618
,14	Mr. Yasır Gul	07.11 1993	07.03.2018	07.03.2018	3	By Initial	07.03.2018











# INSPECTORATE OF MINES KHYBER PAKHTUNKHWA, PESHAWAR ATTACHED DEPARTMENT, NEAR JUDICIAL COMPLEX KHYBER ROAD PESHAWAR Ph: 091-9211404-9210815- Fax No. 091-9210236

No. CIM/Admn/Promotion Case/class IV/2018	Deladi	/10 /0010
The Control of the Holle of the Cost of th	Dated:	/ 10 /2018
OFFICE ORDER		

On the recommendation of the Departmental Promotion Committee in Its meeting held on 17.09.2018, the Competent Authority is pleased to order the promotion of the following Class IV (BPS-03) of the Inspectorate of Mines to the past of Junior Clerks (BPS-11) and their posting/transfer with immediate effect in the best public interest. They will be on probation period of one year which is extendable for further one year period 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.

\$.No.	Name of Official with BPS	From	To
Ι.	Mr.Abdul Wadood, Junior Clerk (UPS-11)	Office of Senior Inspector of Mines Kohal	HQ Office Peshawar
2.	Mr Shuaib Ali, Junior Clerk(BPS-11)	MRSTC Jalozol District Nowshera	HQ Office Peshawar
3.	Mr Rashid Khan Junior Clerk(BPS-11)	-do-	-do-
4	Muhammad Bash'r Junior Clerk(RPS-11)	-do-	Office of Senior Inspector of Mines Swat
5	Mr.Shuhab All Junior Clerk(BPS-13)	Office of Senior Inspector of Mines Mardan	Office of Senior Inspector of Mines Mardan
6.	Mr Arwan Chand Junior Clerk(BPS-11)	Ollice of Senior Inspector of Mines Kohal	Office of Inspector of Mines Buner.

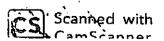
Sd/-Chief Inspector of Mines Khyber Pakhlunkhwa Peshawar

Endst: No. CIM/Admn/Promotion Case/class IV/2018/Slo6-27 Deted: 25/04: /2018
Capy forwarded to:

- 1. PS to Secretary Mineral Development Department Govt: of Khyber Pakhtunkhwa. Peshawar.
- 2. The Accountant General Khyber Pakhlunkhwa Peshawar.
- 3. The Chief Inspector of Mines Khyber Pakhtunkhwa Peshawar.
- 4. The District Account Office Kohat, Swat, Nowshera, Buner and Mardan,
- 5. The Office of Senior Inspector of Mines Kohal, Swaf and Mardan.
- 6. The Office of Inspector of Mines Buner.
- 7. The Superintendent (MRSTC) Jalozai District Nowshera.
- B. The Budget & Account Section HQ Office Peshawar.
- 9. Officials concerned for compliance.
- 10. P/F of the officials concerned. Shahab Ali

CINVIOLE .

Administrative Officer
For Chief Inspector of Mines
Khyber Fakhtunkhwa Peshawar



Aner-G 57

### BEFORE THE HONORABLE PESHAWAR HIGH COURT PESHAWAR

Writ	petition	No		12	0	2	C
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Muhammad Shoaib (Naib Qasid) S/O Muhammad R/O Mohallah Redi Gul Baricham Mardan......Petitioner

#### VERSUS

- Government of Khyber Pakhtunkhwa, through Chief
   Secretary, Civil Secretariat, Peshawar
- 2. Government of Khyber Pakhtunkhwa, Inspectorate of Mine through Chief Inspector of Mine at Khyber Road, Peshawar
- 3. Government of Khyber Pakhtunkhwa through Senior Inspector of Mine at Muqam Mandi Mardan
- 4. Government of Khyber Pakhtunkhwa through Secretary Mine and Mineral Department at Civil Secretariat Peshawar
- 5. Government of Khyber Pakhtunkhwa, Directorate of Mine and Mineral through Director General at Khyber Road, Peshawar
- 6. Government of Khyber Pakhtunkhwa through Secretary
  Establishment at Civil Secretariat Peshawar

EXAMINER Peshavar High Court

WP243-2020 Muhammad Shoaib vs Govt of kn. full ush ng 50

58

Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973

#### Respectfully Sheweth:-

Precisely stating the facts of the case out of which the present Constitutional Petition arises as under:-

- 1. That the Petitioner is a law abiding citizen of Pakistan and residing within the territorial jurisdiction of this Honourable Court (Copy of the CNIC is attached as Annex 'A').
- 2. That after passing SSC examination in the year 2006, the Petitioner was appointed as Naib Qasid (BPS-1) in Mines and Mineral Department with effect from 08-01-2013 through office order No 1170-74/3/496.DGMM/Admn. (Copies of the SSC and appointment order are attached as Annex 'B & C').
- 3. That Mineral Development Department in consultation with Establishment department and Finance department issued notification explaining method for recruitment, qualification and other condition for appointment on posts born in the Inspectorate of Mines KPK. (Copy of the notification is attached as Annex 'D').
- 4. That as per mentioned notification 33% quota are reserved for Daftaris, Qasids, Naib Qasid and holder of other equivalents post with two year service and 2<sup>nd</sup> class SSC for promotion to the post of Junior Clerk (BPS-11).
- 5. That as per above notification for promotion to Junior Clerk (BPS-11) a joint seniority list will be prepared on the dates

WP243-2020 Muhammad Shoaib vs Govt of kp full usb pg 50

- of acquiring SSC among Daftari, Qasids, Naib Qasid and holder of other equivalents posts.
- 6. That the Respondents intentionally ignored Petitioner from promotion to the post of Junior Clerk and promoted those, who were not eligible, being a junior in seniority list issued by the Respondents himself. (Copy of the seniority list and promotion order is attached as Annex 'E & F').
- 7. That Petitioner being aggrieved, having no other adequate and efficacious remedy available, is now approaching this Honourable Court inter-alia on the following grounds:-

#### **GROUNDS:-**

- A) That as per policy/notification, the Petitioner is entitled/eligible to be promoted to the post of Junior Clerk (BPS-11) but the Respondents intentionally ignored the Petitioner, which is against the policy and constitution and is clearly discrimination.
- That law and precedents discourage the policy of pick and choose and encourage merit always, but by ignoring the Petitioner from promotion to Junior Clerk (BPS-11) and promoting junior to the said post is clearly indicate the intention of pick and choose by Respondents.
- C) That Petitioner is fit for promotion under 33% quotas in Respondents department.
- D) That there is no complaint of whatsoever against the Petitioner of whatever kind it may be and Petitioner is

ATTESTED

performing his duties, since his appointment with due diligence.

- E) That promotion of junior and ignoring senior is against law, equity and principle of natural justice.
- F) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

#### PRAYER:-

It is, therefore, most humbly prayed that on acceptance of this Writ Petition, the Respondents may kindly be directed to promote the Petitioner to the post of Junior Clerk (BPS-11) from the post of Naib Qasid (BPS-3) under 33% department promotion quota.

Any other relief, not specifically asked for may be granted in favour of Petitioner.

Petitioner

Through:

HAR

(HAFEEZ UL ASAD SHANGLA)

Advocate,

High Court, Peshawar

#### **CERTIFICATE:-**

Dated:-06-01-2020

No such writ petition has earlier been filed by the Petitioner before this

Honourable Court except the instant one

Advocate

#### LIST OF BOOKS:-

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other book as per need ATTESTED

Peshawar High Cour

### PESHAWAR HIGH COURT, PESHAWAR

### ORDER SHEET

Date of Order of Proceedings  1  2  16.07.2020  W.P. No.243-P/2020  Present: Mr. Hafeez-ul-Asad, Advocate, for the petitioner.  Mr. Rab Nawaz Khan, AAG, for the Provincial Government, alongwith Mr. Tufail, Assistant, of the respondent-Department.  *******  IJAZ ANWAR, J. Muhammad Shoaib, petitioner herein, through the instant Constitutional petition under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, is seeking issuance of direction of this Court to the respondents to promote him to the post of Junior Clerk (BPS-11) under 33% Departmental Promotion Quota reserved for the Class-IV employees.  2. Preliminary arguments heard and record perused.  3. In essence, the grievance of the petitioner pertains to his non-consideration for the post of Junior Clerk (BPS-11) in terms of 33% Departmental Promotion Quota reserved for the Class-IV employees. Similarly, petitioner also questioned the vires of the recruitment	Date of Order of	Order or att. D. II
16.07.2020  W.P. No.243-P/2020  Present: Mr. Hafeez-ul-Asad, Advocate, for the petitioner.  Mr. Rab Nawaz Khan, AAG, for the Provincial Government, alongwith Mr. Tufail, Assistant, of the respondent-Department.  *******  IJAZ ANWAR, J. Muhammad Shoaib, petitioner herein, through the instant Constitutional petition under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, is seeking issuance of direction of this Court to the respondents to promote him to the post of Junior Clerk (BPS-11) under 33% Departmental Promotion Quota reserved for the Class-IV employees.  2. Preliminary arguments heard and record perused.  3. In essence, the grievance of the petitioner pertains to his non-consideration for the post of Junior Clerk (BPS-11) in terms of 33% Departmental Promotion Quota reserved for the Class-IV employees. Similarly,		Order or other Proceedings with Signature of Order (s)
Present: Mr. Hafeez-ul-Asad, Advocate, for the petitioner.  Mr. Rab Nawaz Khan, AAG, for the Provincial Government, alongwith Mr. Tufail, Assistant, of the respondent-Department.  *******  IJAZ ANWAR, J. Muhammad Shoaib, petitioner herein, through the instant Constitutional petition under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, is seeking issuance of direction of this Court to the respondents to promote him to the post of Junior Clerk (BPS-11) under 33% Departmental Promotion Quota reserved for the Class-IV employees.  2. Preliminary arguments heard and record perused.  3. In essence, the grievance of the petitioner pertains to his non-consideration for the post of Junior Clerk (BPS-11) in terms of 33% Departmental Promotion Quota reserved for the Class-IV employees. Similarly,	1	
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Court to the respondents to promote him to the post of Junior Clerk (BPS-11) under 33% Departmental Promotion Quota reserved for the Class-IV employees.  2. Preliminary arguments heard and record perused.  3. In essence, the grievance of the petitioner pertains to his non-consideration for the post of Junior Clerk (BPS-11) in terms of 33% Departmental Promotion Quota reserved for the Class-IV employees. Similarly,		Article 199 of the Constitution of the Islamic Republic
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<ol> <li>Preliminary arguments heard and record perused.</li> <li>In essence, the grievance of the petitioner pertains to his non-consideration for the post of Junior Clerk (BPS-11) in terms of 33% Departmental Promotion Quota reserved for the Class-IV employees. Similarly,</li> </ol>		Junior Clerk (BPS-11) under 33% Departmental
3. In essence, the grievance of the petitioner pertains to his non-consideration for the post of Junior Clerk (BPS-11) in terms of 33% Departmental Promotion Quota reserved for the Class-IV employees. Similarly,		Promotion Quota reserved for the Class-IV employees.
to his non-consideration for the post of Junior Clerk  (BPS-11) in terms of 33% Departmental Promotion  Quota reserved for the Class-IV employees. Similarly,		2. Preliminary arguments heard and record perused.
(BPS-11) in terms of 33% Departmental Promotion  Quota reserved for the Class-IV employees. Similarly,		3. In essence, the grievance of the petitioner pertains
Quota reserved for the Class-IV employees. Similarly,		to his non-consideration for the post of Junior Clerk
		(BPS-11) in terms of 33% Departmental Promotion
petitioner also questioned the vires of the recruitment		Quota reserved for the Class-IV employees. Similarly,
	4	petitioner also questioned the vires of the recruitment

ATTESTED

EXAMMER Peshawar High Court

rules as, according to him, in the earlier rules, there was no condition of 2<sup>nd</sup> Division of S.Sc, while, in the prevailing recruitment rules, such condition has been imposed.

4. In any case, the matter purely relates to the terms and conditions of service of a civil servant and same can better be resolved by the Khyber Pakhtunkhwa Services Tribunal, Peshawar. In view of the bar contained in Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, this writ petition is not maintainable. However, petitioner is at liberty to approach the Departmental Authority and thereafter may file a Service Appeal before the competent forum in accordance with law. This writ petition is disposed of in the above terms.

Announced Dt:16.07.2020

JUDGE

Date of Presentation of Poplication No of Pages.

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the Mr. Justice Ikramullah Khan and Hon'ble Mr. Justice Ijaz A

بخدس جناب سیم انسلیم ای ما نیز ، مردان م الزارس مل مال ن عدالت عاليم وس of the is called the one - and the only is the - EWUSE (Stay Order) of I do ? July Solve of Ity در صواستی کو علمانہ طور پر امران بال کی عرصی وسی رسی کردی الله سأل كو ابنا حق بل سلاء . 00 lest 11/06/2020:12/1 Crew Jes & relect put up DFA please 11/6/20 1. M General hill vol. II) 

ATTESTER

The Secretary, Mineral Development Department, Khyber Pakhtunkhwa.

Through Proper Channel.

### Subject: APPLICATION OF MUHAMMAD SHOAIB FOR PROMOTION FROM NAIB QASID TO JUNIOR CLERK.

- 1. That, there were 07 post of Junior Clerks meant for promotion and the undersigned was at S.No 6 for the promotion.
- 2. That the promotion of the undersigned was covered under the service rules at that time (Copy of Service Rules at Annex-A)
- 3. That the concerned offices at that time purposely on melefide intention did not conduct/call the Departmental Promotion Committee meeting.
- 4. If the DPC was held in time the undersigned would have been promoted on merit.
- 5. That in the year 2018 the inspectorate of mines notified revised service rules there by amending the crieteria for promotion of the post of junior clerk, keeping 2<sup>nd</sup> division SSC Certificate which deprived the undersigned from getting promotion.
- 6. That, Peshawar High Court in its decision on Writ Petition No, 1819-P of 2017 with C,M No. 2121 of 2017 dated 19-19-2017 held that accordingly; we dispose of this petition in terms of directing the respondents to place the case of the petitioner for his promotion to the post of BPS-20 in the upcoming meeting of the Provincial Selection Board, which, as per the learned counsel for the petitioner, is scheduled for 27.12.2017 and the PSB is in turn directed to consider the case the petitioner on its own merits and seniority without considering the course of SMC as mandatory at the moment when the necessary amendments in the rules have not brought about.

Keeping in view the above facts, since the undersigned was eligible for promotion on the basis of service rules date and there 17.10.2010 and there was vacancy available therefore in light of the PHC decision in date 19.10.2017, the undersigned may be given promotion on the basis of criteria laid down in the service rules at that time in order to save me from financial losses and to provide me justice.

TESIE.

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Muhammad Shoaib

Naib Qasid

Senior Inspector of Mines, Mardan

### بخدمت جناب سينئرانسپٽر آف مائيز مردان دويژن, مردان

### جناب عالى!

مود بانہ گزارش کی جاتی ہے کہ سائل نے عدالت عالیہ میں اپنے پر وموش کے لیے کیس جمع کیاتھا ۔اس سے پہلے میں نے محکمانہ طور پر 2020-60-11 کو درخواست جمع کیاتھا جس کا ڈائری نمبر 268ہے۔جس پرابھی تک کوئی کاروائی نہیں ہوئی۔ ہائی کورٹ نے بھی قانونی کاروائی کے تفصیلی فیصلہ 2020-07-16 کومحکمہ کوارسال کیاتھا جو درخواست کے مسائل کے درخواست کومحکمانہ طور پرافسران بالاکی خدمت میں پیش کریں تاکہ سائل اسکے دسائل تاحیات دُعاگو رہےگا۔

توعین نوازش ہوگی۔

العارض

مورى: <u>مر مر او المر</u>

آپکا تالع فرمان محدشعیب (نائب قاصد) رابطهٔ نمبر: 5725205-0313

Peshawar.

اطلاع برائے کا پی: 1) سیکٹری منرل ڈیپار ٹمنٹ خیبر پختوان خواہ پیثا در 2)۔۔۔ چیف انسپکٹر مائیز خیبر پختون خواہ پیثا در

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بعدالت موس الربي المثاور

مورده کا لکو سر مینام کرده کی منجاب ستال مقدمه بنام کرده کی مشهب بنام کرده کی مقدمه دعوی کی کام کی مینام کی مینام کی مینام کی مینام کی مینام کی مینام کی مینام کی مینام کی مینام کی مینام کی مینام جرم

باعث تحربيآ نكه

مقدمه مندرجه عنوان بالاميس ابني طرف سے واسطے پيروي وجواب دى وکل کاروائی متعلقه

آن مقام کررے افرار کیاجا تا ہے۔ کہ صاحب موصوف کومقد مدی کل کاروائی کا کائل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامہ کرنے وتقر رفالث وفیصلہ پرحلف دیے جواب دہی اورا قبال دعوی اور بصورت ڈگری کرنے اجراء اور وصولی چیک وروپیدار عرضی دعوی اور درخواست ہرقتم کی تصدیق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کیطرفہ یا پیل کی برامدگ اور منسوخی نیز دائر کرنے ابیل گرانی ونظر فانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ فیکورکی کل یا جتارہ وگا۔ از بصورت ضرورت مقدمہ فیکورکی کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو ایٹے ہمراہ یا اینے بجائے مقدمہ فیکورکی کل یا جزوی کا رفتار شدہ کو بھی وہی جملہ فیکورہ با اختیارات حاصل ہول کے اور اس کا ساختہ پر داختہ منظور وقبول ہوگا دوران مقدمہ میں جوخر چہ ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حدسے باہر ہوتو وکیل صاحب پابند ہوں گے۔ کہ پیروی فیکورکریں۔ لہذا وکالت نامہ کھدیا کہ سندر ہے۔

الرقوم كي الله المكوم

العبد العبد

egter H. Do

> عدانان سٹیشنری مارٹ چک شتگری پٹاورتی فون 2220193 Mob: 0345-9223239

Befor The Hombol Earlie Tribured reple. 5/4 11549/2020

Muha mured Shoon's us Gout of Lylic.

Application for Sub-rice of process fee and extention of firm for sub-reson

It is subulled as under.

I That the about titl Service ADNOW is feeding and admitted for full thering and fix for tody 12 2021
2) That Applied would to Submite process fee and required extension of time for the purpose.

Let is thinken required that tim may wisey be give to Applelax to Sub-da Process fee.

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Before Houvel Service Tribunal at Pesheurr SA NO - 11549/2020

Muhammad Showib

VS

Cont of 1-bic

Application for adjurment of above mentioned Service Append 20 11549/2020.

It is sub-intel as under.

Court and fixed for today 19 7 andies befor his House

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Apparl my Kindly & adjourned.

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#### PESHAWAR HIGH COURT, PESHAWAR

#### DAILY LIST FOR MONDAY, 18 JULY, 2022

REFORE-

MR. JUSTICE Dr. KHURSHID IOBAL

Court No:

20

#### NOTICE CASES

7.	Cr.M(BA) 2096-
٠.,	P/2022(Criminal
-	Miscellaneous-Ba
	Application-PPC)
	(405075

Fida Muhammad Vis State & another

Zarbad Shah Khan (Mardan)

Cr Appeal Branch AG Office

87	CM 846/2016 With
<b>\</b>	C.R 599-P/2016
-	(Recovery)(Again
•	st decree (stay
·	granted on
	02/01/2017)(Decre
	e-Possession)
	(103214

Muhammad Usman and anothe Hafeezul Asad shangla V/s

Islam Badshah Fazle Haq Kohidamani

C.R 600/2016 With C.M-847/2016 Agianst decree

Muhammad Hanif and others

Spin Badshah and others

Hafeezul Asad shangla L

Fazal e Haque Kohidamani

CM 557/2017 With C.R 348-P/2017(-) (111614)

Dilbar Shah etc Vis Quraish Khan etc Muhammad Humayun, Fayaz Mohammad (Swabi)

Syed Sher Badshah Gillani (swabi), Asad Zeb Khan

10. C.R 389-P/2017 With CM 614/2017 with O/Note dt:08/02/2022(-) (112301

Govt.of KPK through Secretary C & W Department etc Vis :

. Advocate General KPK

Peshawar \_

Taj Muhammad etc Sadeeq James, Rehmat ali

11. C.R 898-P/2019 with CM No. 1122/2019(stay granted on 29/08/2019)(Decree-Recovery) (147617 CR 265/2021

M/s Frontier Ceramics Ltd V/s (Date By Court)

Asad Ul Mulk

Noman Ghani

Nazir Ahmad, Zia ud Din Khan

Muhammad Iqbal

Muhammad Arshad Yousafzai

M/S Frontier Ceramics & others

IT Branch Peshawar High Court

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Video Link only available in Court # 1,2,3 and 4

