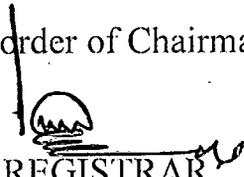


Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - _____ 1526/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/10/2022	<p>The appeal of Mr. Zia Ullah Khan presented today by Mr. Zartaj Anwar Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 1526 /2022

Mr. Zia Ullah KhanAppellant

V E R S U S

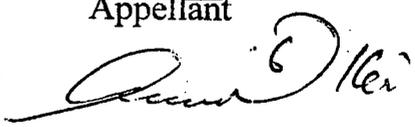
Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat
Peshawar & others.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-7
2.	Affidavit		8
3.	Addresses of Parties		9
4.	Copy of the notification dated 22.02.2018	A	10-17
5.	Copy of the transfer order dated 27.06.2022	B	18
6.	Copy of the departmental appeal dated 30.06.2022	C	19-20
7.	Copy of the transfer order and service appeal	D & E	21-28
8.	Other Documents		29-51
9.	Wakalatnama		52

Appellant

Through


ZARTAJ ANWAR
Advocate High Court
Office FR ,3,Forth
Floor Bilour Plaza
Peshawar Cantt.Cell:
0331-9399185
Email:Zartaj9@yahoo.com

Dated

1

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 1526/2022

Mr. Zia Ullah Khan S/O Hidayat Ullah Khan R/O Jamsheed Abad
Babu Ghari Chowk Warsak Road Peshawar.

(Appellant)

V E R S U S

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Peshawar.
2. Secretary Establishment, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Secretary Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa, Peshawar.

(Respondents)

SERVICE APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER DATED 27.06.2022, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM PLANING OFFICER, DIRECTORATE OF SOCIAL WELFARE SPECIAL EDUCATION & WOMEN EMPOWERMENT KHYBER PAKHTUNKHWA, TO SOCIAL WELFARE OFFICER PESHAWAR, IS HIGHLY ILLEGAL, MALAFIDE, UNLAWFUL WITHOUT LAWFUL AUTHORITY, AGAINST THE RULES AND POLICY, , AGAINST WHICH DEPARTMENTAL APPEAL WAS FILED ON 30.06.2022, WHICH IS STILL NOT RESPONDED AFTER ELAPSE OF STATUTORY PERIOD OF 90 DAYS.

2

Prayer in Appeal:

On acceptance of this appeal the appellant may please be allowed/Posted at his original place of posting/designation i.e. Planning Officer BPS-17 in Directorate Of Social Welfare Special Education & Women Empowerment Khyber Pakhtunkhwa, whereas the order issued by the secretary, legally not competent to issue the posting transfer of BPS-17 and above and also against the different nomenclature as the appellant was appointed against the post of planning officer through Public Service commission and cannot be transfer/posted against different post/nomenclature, thus declared to be illegal unlawful, without lawful authority, in violation of the rules and policy, against the express provision of law and having no legal effect.

Any other remedy deems proper may also be allowed not specifically asked, in the best interest of justice

Respectfully Sheweth:-

Brief facts of the instant appeal are as under:

1. That the appellant is the bonafide and local resident of Jamsheed Abad Babu Ghari Chowk Warsak Road Peshawar and a law abiding citizen of Pakistan.
2. That the appellant was serving in the (Social Welfare) Department as Planning Officer (BPS-17) in the Directorate of Social Welfare Special Education & Women Empowerment Khyber Pakhtunkhwa.
3. That appellant while serving the respondent department with great zeal and devotion without any complaint whatsoever from his superiors till date.
4. That the post of planning officer was created for the purpose to plan on evidence based facts, oversee the implementation of project and indicate bottlenecks in implementation process.

5. That the petitioner was serving the department in a capacity of Planning Officer BPS-17 in the Directorate of social welfare, special education & women empowerment Khyber Pakhtunkhwa with the entire zeal and devotion without any complainant what so ever.
6. That the Govt of Khyber Pakhtunkhwa published vide notification dated 22.02.2018 the service rules of the Khyber Pakhtunkhwa provincial planning service rules,2018 in which under section 9 Repeal and serving: (1) on coming into force of these rules, the service rules of the concerned line department shall stand repealed to the extent of the posts as given in schedule-I
(2) Any person appointed to a post specified in the schedule-I before the commencement of these rules shall, on commencement of these rules, be deemed for all intents and purposes to have been validly appointed under these rules on the authority of the planning and development as assigned to it under the Khyber Pakhtunkhwa govt rules of business 1985, and he/she affairs shall henceforth be administered by the planning and development department in accordance with these rules and any other rules for the time being in force and made applicable to him/her in accordance with Khyber Pakhtunkhwa govt rules of business,1985.*(copy of the notification dated 22.02.2018 is attached as annexure A).*
7. That the post of the petitioner clear reflects in the schedule 1 and according to the rule 3 of the rules , which clearly says in constitution of the service, service shall consist of the posts as specified in schedule-1 and such other posts as may be added it from time to time.
8. That the petitioner has all the requisite eligibility criteria qualification, experience in accordance with new provincial planning cell rules 2018, furthermore he is quite at par with officers of P&D department as well planning cell of line department, who are administered under the provincial planning cell.
9. That the respondent Department vide Notification dated 22nd February 2018 promulgated the provincial planning cell whereas all the employees of the Provincial government who born on the strength of the planning and Development Department well merged into one department/group will be known as PS group and



for such purpose PPS service rules were framed who can run the affairs of the PPS groups.

- 10. That the petitioner is serving in scale of BPS-17, whereas under the rules and posting transfer policy the competent authority for the purpose of posting and transfer of officials of BPS-17 and above the Chief Secretary of the Province is the competent authority to issue such orders or with the approval of Chief Secretary but the same office/authority was superseded by the office of Secretary respondent no 5 will fully deliberately with a Malafide intention as the appellant in question the corrupt practices of the officials, also against the different nomenclature as the appellant was appointed against the post of planning officer through Public Service commission and cannot be transfer/posted against different post/nomenclature,
- 11. That meanwhile the National Accountability bureau issued a letter addressing the appellant to come on 27.05.2019 to record his statement regarding grant an aid to Dost Welfare Foundation Peshawar of amounting rupees of 150 million and recorded his statement as per direction of the National Accountability bureau.
- 12. That the respondent Department issued the transfer office order dated 27.06.2022 and the appellant was posted as Social Welfare Officer Peshawar, whereas the appellant was initially appointed through Public Service Commission against the post of specific designated post of planning officer, furthermore he can be retain or posted against the post of planning officer only but malafidely posted/transferred as a social welfare officer Peshawar which is against the law, rules and policy. *(Copy of the transfer order is attached as annexure as B).*
- 13. That the appellant filed departmental appeal/representation against the impugned order 27.06.2022, while departmental appeal dated 30.06.2022, which is still not responded after elapse of statutory period of 90 days. *(Copy of the departmental appeal dated 30.06.2022 is attached as annexure C).*
- 14. That appellant approached this Hon'ble Tribunal against the illegal posting and transfer order inter alia on the following grounds

5

GROUNDS:-

- A. That appellant has not been treated in accordance with law and thus his rights secured and guaranteed under the law and constitution are badly violated.
- B. That the notification of posting and transfer is illegal issued, by the incompetent authority in the matter and also the appellant appointed through Public Service Commission particularly against the post of planning officer and can only be posted transferred as a planning officer, while in the impugned transferred order posted as Social Welfare Officer.
- C. That according to the posting and transfer policy of the Provincial Govt. all the posting of the Provincial Govt. all the posting transfer shall be strictly in public interest and shall not be abused/misused to victimise the Govt. servant, in case of present appellant. The order of posting/transfer was not issue in the mode and manner of the posting and transfer policy.
- D. That the petitioner is serving in scale of BPS-17, whereas under the rules and posting transfer policy the competent authority for the purpose of posting and transfer of officials of BPS-17 and above the Chief Secretary of the Province is the competent authority to issue such orders or with the approval of Chief Secretary but the same office/authority was superseded by the office of Secretary respondent no 5 will fully deliberately with a Malafide intention as the appellant in question the corrupt practices of the officials.
- E. That meanwhile the National Accountability bureau issued a letter addressing the appellant to come on 27.05.2019 to record his statement regarding grant an aid to Dost Welfare Foundation Peshawar of amounting rupees of 150 million and recorded his statement as per direction of the National Accountability bureau.
- F. That the respondent Department issued the transfer notification dated 27.06.2022 and order the posting of the appellant as Social Welfare Officer District Peshawar, whereas the appellant was initially appointed through Public Service Commission against the post of specific designated post of planning officer, furthermore he can be retain or posted against the post of planning officer only but malafidely posted/transferred as a social welfare officer, the transfer of the appellant is also against the different nomenclature as the appellant was appointed against the post of planning officer

6

BPS-17 through Public Service commission and cannot be transfer/posted against different post/nomenclature.

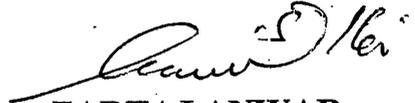
- G. That prior to this the appellant was transferred to the post of Social Welfare Officer Charsadda, against which the appellant filed service appeal no 1174/2019 before the honourable Service Tribunal Peshawar , in which comments/reply was called from the respondents and during the pendency of the service appeal the transfer order of the appellant was set aside by the department. *(Copy of transfer order and service appeal is attached as annexure D & E).*
- H. That the impugned order was issued politically motivate as to adjust their own blue eyed ones.
- I. That there is no complaint whatsoever against the appellant and performing his duty with great zeal and devotion.
- J. That in fact there exists no exigencies of service nor the order of transfer cannot be termed as in the public interest it is a result of adjustment of their own blue eyed ones at the cost of the appellant, and this not tenable in the eyes of law.
- K. That appellant seeks the permission of this Hon'ble Tribunal to rely to additional grounds at the hearings of this petition.

It is, therefore humbly prayed that, **On acceptance of this appeal the appellant may please be allowed/Posted at his original place of posting/designation i.e. Planning Officer BPS-17 in Directorate Of Social Welfare Special Education & Women Empowerment Khyber Pakhtunkhwa, whereas the order issued by the secretary, legally not competent to issue the posting transfer of BPS-17 and above and also against the different nomenclature as the appellant was appointed against the post of planning officer through Public Service commission and cannot be transfer/posted against different post/nomenclature, thus declared to be illegal unlawful, without lawful authority, in violation of the rules and policy, against the express provision of law and having no legal effect.**

Any other remedy deems proper may also be allowed not specifically asked, in the best interest of justice


Appellant

Through


ZARTAJ ANWAR
Advocate Supreme Court
Of Pakistan

&

IMRAN KHAN
Advocate High Court
Peshawar

Certificate

It is certified that as per instruction of my client no such like appeal has earlier been file on the same subject matter between the same parties


Appellant

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2022

Mr. Zia Ullah Khan **Appellant**

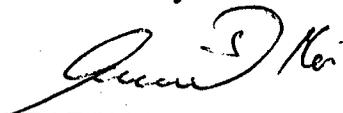
V E R S U S

Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat
Peshawar & others..... **Respondents**

AFFIDAVIT

I, Mr. Zia Ullah Khan S/O Hidayat Ullah Khan R/O Jamsheed
Abad Babu Ghari Chowk Warsak Road Peshawar, do hereby solemnly
affirm and declare on oath that the contents of the accompanying
Service Appeal are true and correct to the best of my knowledge and
belief and nothing has been concealed from this Hon'ble Court.

Identified by


ZARTAJ ANWAR
Advocate Supreme Court
Of Pakistan


DEPONENT

CNIC#: 11101-1428415-9

03440763292

Email : *Ziaullahkhan69@gmail*

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2022

Mr. Zia Ullah KhanAppellant

V E R S U S

Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat
Peshawar & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT:

Mr. Zia Ullah Khan S/O Hidayat Ullah Khan R/O Jamsheed
Abad Babu Ghari Chowk Warsak Road Peshawar.

RESPONDENTS:-

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Peshawar
2. Secretary Establishment, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Secretary Finance, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Secretary Law and Justice, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
5. Secretary Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa, Peshawar.

Through


(Respondents)
Appellant

ZARTAJ ANWAR
Advocate Peshawar

EXTRAORDINARY
GOVERNMENT



16
Anwar A.
REGISTERED NO. PIII

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, THURSDAY, 22nd FEBRUARY, 2018

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
PLANNING AND DEVELOPMENT DEPARTMENT

NOTIFICATION

Peshawar, Dated: 22nd February, 2018

NO. SO(E)P&D/6-1/SR/PPS/2018.- In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Government of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:

THE KHYBER PAKHTUNKHWA PROVINCIAL PLANNING SERVICE RULES, 2018.

1. **Short title application and commencement.**--- (1) These rules may be called the Khyber Pakhtunkhwa Provincial Planning Service Rules, 2018.

(2) These rules shall apply to the recruitment and promotion to the posts in Provincial Planning Service.

(3) These rules shall come into force at once.

2. **Definitions.**--- In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them, that is to say-

- (a) "appointing authority" means the appointing authority as specified in rule 6 of these rules;
- (b) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;
- (c) "Government" means the Government of the Khyber Pakhtunkhwa Province;
- (d) "Department" means the Planning and Development Department;
- (e) "Departmental Examination" means the prescribed examination to be conducted by the Department for confirmation within probationary period or for promotion to higher post, as the case may be;

- (f) "Departmental Training" means any training prescribed by Government, the successful completion whereof is necessary for promotion to BS-19 and 20 or any change in the training required from time to time;
- (g) "Schedule" means the Schedule appended to these rules;
- (h) "Service" means the Provincial Planning Service; and
- (i) "Secretariat" means the Civil Secretariat as defined in clause (r) of rule 2 of the Khyber Pakhtunkhwa Government Rules of Business, 1985.
3. **Constitution of the Service.**--- The Service shall consist of the posts as specified in Schedule-I and such other posts as may be added to it from time to time.
4. **Method of recruitment.**--- (1) The method of recruitment, minimum qualification, age limit and other matters related thereto for the Service shall be such as specified in Schedule-II.
- (2) Initial recruitment to the Service shall be made through an examination conducted by the Commission.
- (3) The standard and syllabus of examination for the Service shall be such as specified in Schedule-III.
5. **Training.**--- On appointment to the post borne in the Service in BPS-17 via initial recruitment, every officer so appointed shall successfully complete six months mandatory training at any academy or institute decided by Government as per Module specified in Schedule-IV. The training shall be followed by a Departmental Examination as specified in Schedule-V, to be conducted by the Academy or institute, as the case may be.
6. **Appointing Authority.**--- The Chief Secretary, Khyber Pakhtunkhwa shall be the appointing authority for posts borne on the Service in BPS-17.
7. **Savings.**--- In all other matters not expressly provided for in these rules, the members of the Service shall be governed by the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and any other rules pertaining to the terms and conditions of service made or deemed to have been made under the Khyber Pakhtunkhwa Civil Servants Act, 1973.
8. **Transitional.**--- The seniority position of various officers appointed in planning cadres of various Departments and brought on the strength of the Service on coming into force of these rules shall be considered from the date of their regular appointment to posts in their present Basic Scales of pay:
- Provided that where two or more civil servants have been appointed to their present Basic Scale on the same day, the older in age shall be considered senior.

9. Repeal and saving.--- (1) On coming into force of these rules, the service rules of the concerned line Departments shall stand repealed to the extent of the posts as given in Schedule-I.

(2) Any person appointed to a post specified in Schedule-I before the commencement of these rules shall, on commencement of these rules, be deemed for all intents and purposes to have been validly appointed under these rules on the authority of the Planning and Development Department as assigned to it under the Khyber Pakhtunkhwa Government Rules of Business, 1985, and his/her affairs shall henceforth be administered by the Planning and Development Department in accordance with these rules and any other rules for the time being in force and made applicable to him/her in accordance with the Khyber Pakhtunkhwa Government Rules of Business, 1985.

SCHEDULE-I
(see rule 3)

S. No	Department		Name of Posts	Basic Scale	No. of Posts	Total No.
	1	2				
1	Planning and Development Department	Main P&D	Senior Chief	20	4	51
			Chief of Section	19	9	
			Director (M&E)	19	1	
			Assistant Chief	18	10	
			Research Officer	17	13	
		PPI Cell	Director	19	1	
			Assistant Chief	18	1	
			Research Officer	17	6	
		DG PERRA	Director Planning & Tech.	19	1	
			Program Manager	18	4	
			Assistant Director	17	1	
2	Elementary and Secondary Education Department	Chief Planning Officer	19	1	10	
		Senior Planning Officer	18	3		
		Planning Officer	17	5		
		Statistical Officer	17	1		
3	Higher Education, Archives and Libraries Department	Chief Planning Officer	19	1	06	
		Deputy Chief Planning Officer	18	1		
		Senior Planning Officer	18	1		
		Planning Officer	17	2		
		Statistical Officer	17	1		
4	Health Department	Chief Planning Officer	20	1	09	
		Deputy Chief Planning Officer	19	1		
		Senior Planning Officer	18	2		
		Planning Officer	17	5		
5	Industries, Commerce and Technical Education Department	Economic Advisor	19	1	04	
		Assistant economic Advisor	18	1		
		Research Officer	17	2		
6	Zakat, Ushr, Social Welfare, Special Education and Women Empowerment Department.	Senior Planning Officer	18	1	03	
		Planning Officer ✓	17	1		
		Monitoring Officer	17	1		

1127 KHYBER PAKHTUNKWHA GOVT: GAZETTE, EXTRAORDINARY, 22nd FEBRUARY, 2018

S. No	Department	Name of Posts	Basic Scale	No. of Posts	Total No.
			3	4	5
7	Sports Tourism, Archaeology, Museum and Youth Affairs Department.	Planning Officer	17	1	01
8	Information and Public Relations Department	Planning Officer	17	1	01
9	Transport Department	Senior Planning Officer	18	1	02
		Planning Officer	17	1	
10	Excise and Taxation Department	Taxation Analyst cum SPO	18	1	03
		Economist	18	1	
		Research Officer	17	1	
11	Agriculture and Livestock Department	Chief Planning Officer	19	1	05
		Deputy Director Planning	18	1	
		Deputy Director Monitoring	18	1	
		Planning Officer	17	1	
		Assistant Statistical Officer	17	1	
		Assistant Director Planning	17	1	
12	Public Health Engineering Department.	Planning Officer	17	1	01
13	Local Government, Elections and Rural Development Department	Planning Officer	18	1	01
14	Mineral Development Department	Chief Planning Officer	19	1	07
		Sr. Planning Officer	18	2	
		Planning Officer	17	4	
15	Science and Technology and Information Technology Department	Sr. Planning Officer	18	1	04
		Planning Officer	17	3	
16	Environment, Wildlife and Forestry Department	Deputy Director Planning	18	1	02
		Planning Officer	17	1	
17	Labour Department	Research Officer	17	1	01
18	Rescue 1122	Director Planning	19	1	04
		Deputy Director Planning	18	1	
		AD Planning	17	2	
19	District Positions	Planning/Technical Officers	17	25	25
	BPS-20		5		
	BPS-19		19		
	BPS-18		35		
	BPS-17		57 + 25 = 82		
	Grand Total		141		

3	Provincial Planning Service (PPS) (BPS-18) as per detail at Schedule-I			<p>i. Ninety percent (90%) by promotion on the basis of seniority-cum-fitness, from amongst the officers of Provincial Planning Service (PPS) in BS-17 having at least five (05) years service; and</p> <p>ii. ten percent (10%) by transfer from amongst Officers of PAS/APUG/PMS/PCS.</p>
4	Provincial Planning Service (PPS) (BPS-17) as per detail at Schedule-I	<p>a. At least Second Class Master's Degree or Bachelor of Studies (four years) from a recognized University or equivalent qualification in any of the fields namely Economics; Development studies, Agriculture Science, Health Planning and Management, Industrial Economics, Educational Planning and Management, Public Administration, Statistics, Business Administration, Commerce, Computer Science; Political Science, Environmental Management, Environmental Engineering, International Relations, Development Planning; or</p> <p>b. At least Second Class B.Sc/B.E Degree from a recognized University in Civil Engineering or Electrical Engineering or Urban and Regional Planning or City Development and Regional Planning or Town Planning.</p>	21 to 30 years	<p>i. Ten percent (10%) by initial recruitment through departmental examination in a prescribed manner to be determined by the Department and conducted by the Khyber Pakhtunkhwa Public Service Commission from amongst the in-service employees working in Planning Cells of various Departments and the Planning and Development Department's Staff in BPS-11 and above.</p> <p>Provided that only those shall be eligible who possess the required qualification as mentioned against the post in Column No. III.</p> <p>Provided further that upon selection, the candidates shall undergo seven (07) weeks mandatory training in the field of project planning and management as specified in Schedule-IV;</p> <p>Provided further that if no suitable person is available then by initial recruitment; and</p> <p>ii. ninety percent (90%) by initial recruitment.</p>

SCHEDULE-II
(see rule 4(1))

S.No	Nomenclature of Posts	Minimum qualification	Age Limit	Method of Recruitment
I	II	III	IV	V
1	Provincial Planning Service (PPS) (BPS-20) as per detail at Schedule-I	---	---	By promotion on the basis of seniority-cum-fitness, from amongst PPS officers holding posts in BS-19 and having at least five (05) years service in BPS-19 or seventeen (17) years service against posts in BS-17 and above and have undergone Senior Management Course (SMC) or any other training course prescribed by Government.
2	Provincial Planning Service (PPS) (BPS-19) as per detail at Schedule-I	---	---	<p>i. Eighty five percent (85%) by promotion on the basis of seniority-cum-fitness, from amongst officers holding posts in BS-18 and having at least seven (07) years service in BPS-18 or twelve (12) years service against posts in BS-17 and above and have undergone Mid Career Management Course (MCMC);</p> <p>ii. ten percent (10%) by transfer from amongst Officers of PAS/APUG/PCS/PCS; and</p> <p>iii. five percent (05%) by appointment through horizontal transfer from officers of government owned autonomous organizations with at least twelve (12) years regular service in BS-17 and above having qualification prescribed for the initial recruitment of officers of Provincial Planning Service (PPS) (BPS-17).</p>

SCHEDULE-III
(see rule 4(3))

The Syllabus and standard of examination for the Provincial Planning Service shall include the following five compulsory papers and viva voce as per the details given below:

S.No.	Subject/Paper		Maximum Marks	Syllabus
1	English (Précis & Composition)		100	(1) Grammar and Vocabulary (2) Reading Comprehension and Analysis (3) Précis Writing
2	English Essay		50	Candidates will be required to write one or more essays in English. A wide choice of subjects will be given.
3	General Knowledge	Economy of Pakistan (70 Marks)	150	<ol style="list-style-type: none"> 1. Definition and measurement of development, characteristics of under development, rethinking on the concept of development, Growth vs. Redistributive Justice, absolute and relative poverty, basic needs approach. 2. Planning experience of Pakistan: A critical evaluation of the strategy of economic planning. 3. Agricultural development in Pakistan: Changes in agriculture policies over plan periods, major monetary and fiscal measures to promote agricultural development, Green Revolution strategy and its implications for growth and redistribution. Land Reforms and changes in the tenure system 1950 – 1980, Cooperative Farming. 4. Industrial development in Pakistan: Early industrialization strategy, creation of Financial and Development Institutions, major monetary and fiscal measures to promote industrial development, changing role of public sector over the plan periods, evaluation of nationalization policy, concentration of industrial income and wealth. 5. Role of foreign trade and aid in economic development. Trends of Pakistan's Balance of Payments, changes in direction of trade, trends in Pakistan's major exports and imports, causes of significant changes in the trends, the role of migration and remittances in Pakistan's economy, costs and benefits of Foreign Aid. 6. Privatization, denationalization and deregulation, conceptual and operational aspects, international comparisons.

		<p>Current Affair (50 Marks)</p>	<p>Candidates will be expected to display such general knowledge of History, Geography and Politics as is necessary to interpret current affairs:</p> <ol style="list-style-type: none"> i. Pakistan's relations with its neighbours. ii. Pakistan's relations with big powers. iii. International economic issues and Pakistan. iv. Pakistan's role in regional and international organizations. v. Structure of Pakistan's economy, economic planning and development strategies. vi. Central issues and problems in the educational system. vii. Major economic, social and political issues of the world as reflected and discussed in periodicals and newspapers.
		<p>Everyday Science (30 marks)</p>	<ul style="list-style-type: none"> • Introduction Nature of science: Brief history, contribution of Muslims in the evolution and development of science. Impact of science on society. • The Physical Sciences <ol style="list-style-type: none"> (a) Constituents and structure:- Universe, galaxy, solar system, sun, earth, minerals (b) Processes of Nature:- Solar and Lunar Eclipses; day and night and their variation; (c) Energy :- Sources and resources of energy, energy conservation; <ol style="list-style-type: none"> (i) Ceramics, Plastics, Semiconductors; (ii) Computers, Satellites; (iii) Antibiotics, Vaccines, Fertilizers, Pesticides • Biological Sciences <ol style="list-style-type: none"> (i) The basis of life – the cell, chromosomes, genes, nucleic acids (ii) The building blocks – proteins, hormones and other nutrients. Concept of balanced diet. Metabolism. (iii) The human body – a brief account of human physiology and human behavior.

4	Islamyat	50	<ol style="list-style-type: none"> 1. Need of religion and its role in human life, Islam and other religions 2. Fundamental beliefs and practices of Islam. <ol style="list-style-type: none"> (a) Tauheed (Unity of Allah), Risalat (Finality of Prophethood), Akhirat (Day of Judgment) (b) Salat, Soum, Zakat, Hajj, Jihad 3. Islamic way of life <ol style="list-style-type: none"> (i) Sources of Shariah: The Quran, Sunnah, Ijma (Consensus), Qiyas and Ijtihad (Reasoning) (ii) Social system in Islam: Responsibilities and mutual relationship of members of family, separate role of man and woman in an Islamic social setup, concept of women's freedom in Islam, responsibilities of man and woman in character-building of new generation (iii) Islamic political system: - Legislative system, Judicial system (iv) Muslim ummah: Role and objectives of Muslim Ummah 4. Quranic Ayat and their translation <p>Following last (10) surrahs of the Holy Quran and their translations:- Surrah Al-Feel to Surrah An-Nas.</p>
5	Economics	100	<ol style="list-style-type: none"> 1. Micro Economics: Consumer behaviour, determination of market demand and supply, theory of the Firm, producer's equilibrium pricing of the factors of production. 2. Macro Economics: Basic economic concepts, National Income Accounting, consumption function and multiplier, determination of equilibrium level of income and output, inflation. 3. Money and banking: Functions of money, Quantity Theory of money, the Fisher and Cambridge Formulations, systems of note issue, credit creation, functions and central banks, instruments of credit control, Theory of Liquidity Preference. 4. Public Financing: Government expenditure, sources of government revenue, types of taxes, incidence of different taxes, public debt, objectives, methods of repayment, deficit financing. 5. International Trade: Theory of comparative cost, arguments for protection, balance of payments, international liquidity, international money and banking institutions.

6	Viva Voce	50
1.	English (Precis & Composition)	100 Marks
2.	English Essay	50 Marks
3.	General Knowledge	150 Marks
4.	Islamiat	50 Marks
5.	Economics	100 Marks
6.	Viva Voce	50 Marks
	Total:	500 Marks

SCHEDULE-IV

(see rule 5)

Training Module for Provincial Planning Service,
Khyber Pakhtunkhwa officers

(Twenty four (24) weeks Training including four (4) weeks for study tours)

Module I: General Management and Organizational Development (three (3) weeks)

Module II: Personal Knowledge and Skills (two (2) weeks)

Module III: E-Government (three (3) weeks)

Module IV: Project Planning and Management (seven (7) weeks)

Module V: Secretariat - Office Management (five (5) weeks)

Module	Course	Contents	Duration
I	General Management and Organizational Development.	<ul style="list-style-type: none"> • How to manage through subordinates. • To know the process of hiring, firing, or promotion of employees. • To have knowledge about effective planning, delegating, coordinating, staffing, organizing, and decision making to attain better service delivery. • Gender sensitization 	3 weeks
II	Personal Knowledge and Skills	<ul style="list-style-type: none"> • Drafting skills and the manner of writing official letters, summaries, notes, minutes of the meetings, file note etc (both manual and computerized) • Listening skills • Speaking/communication skills • Presentation skills • Briefing skills • Report writing (general & technical) • Time management • Stress management • Dispute resolution • Team building • Humaneering and attitude building. 	2 weeks
III	E-Government	<p>Specific:</p> <ul style="list-style-type: none"> • MS Word • MS Excel • MS PowerPoint • MS Project • File Tracking • E-Office • HR Data basing <p>General:</p> <ul style="list-style-type: none"> • Using internet, browsing, surfing, downloading • Email • MIS 	3 weeks

Module	Area	Contents	Duration
IV	Project Planning and Management	<ol style="list-style-type: none"> 1. Basic concepts i.e. economic development, economic growth, Gross Domestic Produce (GDP), Gross National Produce (GNP), determinants of economic development, features of developing economy. 2. Economic planning---characteristics of planning, objective and types. 3. Evolution of planning machinery in Pakistan. 4. Project and project cycle 5. Project documents i.e. PC-II, PC-I, PC-III, PC-IV & PC-V. 6. How planned projects are practically implemented. 7. Composition and competency of development forums i.e. DDAC, DDWP, PDWP, CDWP, ECNEC, NEC. 8. Concepts of Sponsoring Agency, Executing Agency, Planning Manual, PSDP, ADP, Pre-PDWP meeting, Umbrella project, Non-ADP project, project revision and its types, administrative approval, audit copy, re-appropriation, punching of funds and BCQ. 9. Tendering. 10. Identification and valuation of costs and benefits, NPV, IRR. 11. Cost effectiveness analysis. 12. Network analysis - PERT / CPM for project management. BC Ratio, sensitivity analysis, CPM, Gantt Chart, Pie Diagram, RBM framework. 13. Project Policy 14. Role and responsibilities of Project Director and Project Management Professional Course (PMP). 	7 weeks

16

V	Secretariat - Office Management	<ol style="list-style-type: none"> 1. Government of Khyber Pakhtunkhwa: Organ gram – various Administrative, regulatory setups. 2. Coordination mechanisms between administrative authorities, Departments, attached Departments and autonomous, semi-autonomous bodies. 3. Charter of duties of different government Departments devolved and non-devolved with special introduction to regulatory Departments such as Finance Department, Planning and Development Department, Law Department and Establishment Department. 4. The Khyber Pakhtunkhwa Civil Servants Act, 1973. 5. The Khyber Pakhtunkhwa Government Rules of Business, 1985. 6. The Khyber Pakhtunkhwa Civil Servants Appointment, Promotion and Transfer Rules, 1989. 7. Manual of Secretariat Instructions, Appeal and Conduct Rules. 8. Court cases—time limitations and procedure. 9. Revised Leave Rules. 1981. 10. Policies—recruitment, postings, transfers, deputation, surplus pool. 11. Delegation of Powers Rules. 12. Anti-corruption laws – NAB Ordinance. 13. The Khyber Pakhtunkhwa Local Government Act, 2013. 14. Assembly Business. 	5 weeks
---	---------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------

Note: The duration of modules only indicates the time given to them five lectures per day of one hour each, five days a week. Monthly tests shall be conducted for each Module.

Study Tour: Four Weeks

Destination	Focal Point	Duration
Punjab	Planning and Development Department, Chamber of Commerce and Industry, Local Government Department, Administration Department Civil Secretariat Lahore. Study of any signature project of development sector.	One Week
Sindh	Planning and Development Department, Chamber of Commerce and Industry, Local Government Department, Administration Department Civil Secretariat Karachi. study of any signature project of Development sector.	One week
Islamabad	Pakistan Planning and Management Institute, Pakistan Institute of development Economics, CDA.	One week
Baluchistan	Planning and Development Department, Chamber of Commerce and Industry, Local Government Department, Administration Department Civil Secretariat Quetta. Study of any signature project of development sector.	One week

SCHEDULE-V
(see rule 5)

Departmental Examination

Last week of training shall also include written examination and finalization of marks based on the following outline:

Written Test (Modules)	
Various Assignments during Training (Preparation of Project Documents/ADP/Re-appropriation proposals/Working Papers/Minutes of the meeting)	50 Marks
Conduct Reports During Training (Punctuality, participation, discipline, initiatives, Group Discussions, attitude, response)	20 Marks
Module Based Test Scores	10 Marks
Total	100 Marks

Note: Passing marks will be 60

Attachment: The trainees, for the purpose of acquaintance with practical disposal of Official/Government business, shall undergo three month attachment on rotation at different sections of Planning and Development Department, Finance Department, Project Implementation Units (PIUs) and Planning Cells of different line departments.

Objectives:

- (i) To acquaint the trainee with general office work of the Departments.
- (ii) To educate the trainee towards understanding the provincial budget making, planning and financial processes.
- (iii) To expose the trainee to development initiatives of different sectors, both private and public funded.
- (iv) To inculcate proper attitude in the UT with regard to interaction with the general public.

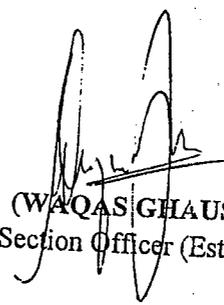
Secretary to,
Government of the Khyber Pakhtunkhwa
Planning and Development Department.

Dated Peshawar the February 22, 2018.

17

Copy forwarded to the: -

1. Additional Chief Secretary (FATA), FATA Secretariat, Peshawar.
2. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. Principal Secretary to Governor, Khyber Pakhtunkhwa.
4. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. All Administrative Secretaries to Government Khyber Pakhtunkhwa.
6. Chairman, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
7. All Divisional Commissioners in Khyber Pakhtunkhwa.
8. Accountant General, Khyber Pakhtunkhwa.
9. All Chief of Sections, P&D Department.
10. All Deputy Commissioners in Khyber Pakhtunkhwa.
11. Director Information, Khyber Pakhtunkhwa.
12. PSO to Chief Secretary Khyber Pakhtunkhwa.
13. PS to Additional Chief Secretary, P&D Department.
14. PS to Secretary, P&D Department.
15. PA to Chief Economist, P&D Department.
16. Manager, Govt: Printing Press Peshawar.


(WAQAS GHAUS)
Section Officer (Estt.)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
SOCIAL WELFARE, SPECIAL EDUCATION
& WOMEN EMPOWERMENT DEPARTMENT**

Handwritten: HANDEX B

Handwritten: 18

Dated Peshawar the 27th June, 2022

NOTIFICATION:

No. SOII(SW) II-52/2021/4128-43 The competent authority (Secretary Social Welfare Department) is pleased to order the postings / transfers of the following officers of Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa in the best of public interest with immediate effect:-

S No.	Name & Designation	From	To
1	Mr. Muhammad Jamshed Khan, Social Welfare Officer (BPS-18 P)	District Officer, Social Welfare Bannu.	Deputy Director, Special Education Complex, Peshawar vice S.No.2
2	Mr. Jamal Shah Social Welfare Officer (BPS-17)	Deputy Director, Special Education Complex Peshawar	District Officer, Social Welfare Mardan. vice S.No.3
3	Abdur Rashid, Social Welfare Officer (BPS-18-P)	District Social Welfare Officer, Mardan	Deputy Director, Special Education Charsadda. vice S.No.4
4	Mr. Jaffar Khan, Rehabilitation Officer (BPS-18 P)	Deputy Director, Special Education Charsadda	District Officer, Social Welfare, Swat. vice S.No.5
5	Ms. Nusrat Iqbal Superintendent (BPS-17)	District Officer, Social Welfare, Swat	Superintendent, Darul Aman Swat. vice S.No.6
6	Ms. Rehana Special Education Teacher	Superintendent, Darul Aman Swat	Senior Teacher, Special Education Centre Swat against the vacant post.
7	Mr. Zia Ullah, Planning Officer (BPS-17)	Planning Officer, Directorate of Social Welfare, Peshawar	Social Welfare Officer, Peshawar against the vacant post.
8	Miss Mahnoor Masroor, Social Case Worker (BPS-16)	Computer Operator, District Office Mansehra	Senior Special Education Teacher, School for MR&PH Mansehra

Secretary to Govt: of Khyber Pakhtunkhwa
Zakat, Usher, Social Welfare, Special Education &
Women Empowerment Department.

Number of Even No & Date:

Copies forwarded for information and further necessary action to the:

1. Accountant General, Khyber Pakhtunkhwa
2. Director Social Welfare, Khyber Pakhtunkhwa.
3. Deputy Director MIS cell, Social Welfare, Department.
4. District Officer Social Welfare concerned.
5. District Account Officer concerned.
6. PS to Minister for Social Welfare, Khyber Pakhtunkhwa.
7. PS to Secretary, Social Welfare, Department.
8. Officers concerned.

Handwritten: DDA

Handwritten signature

Directorate of Social Welfare KPK

Dairy No: 446

Dated: 30/6/22

(ALEM ZEB)
Section Officer-II

Handwritten: AD(LE-I) 30/6/22

19
A. H. C

To,

The Secretary,
Social Welfare, Special Education & Women Empowerment,
Department, Khyber Pakhtunkhwa, Peshawar.

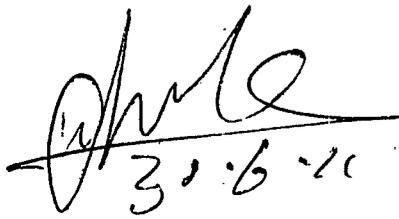
Subject: - APPEAL REGARDING IMPUGNED TRANSFER AS SOCIAL WELFARE OFFICER FROM THE CADRE POST OF PLANNING OFFICER.

Respected Madam,

It is brought into your kind notice that the undersigned has selected through Public Service Commission Khyber Pakhtunkhwa as Planning Officer (BPS-17) and the Competent Authority of Social Welfare Department issued my appointment Notification No. SOII(SWD)/11-52/ 2011/2784-90 dated 31-05-2012 as Planning Officer (BPS-17) in Directorate of Social Welfare (Notification Copy attached).

In this connection, it is submitted that the post of Planning Officer was created for the purpose to plan on evidence based facts, oversee the implementation of project and indicate bottlenecks in implementation process. On dated 03.06.2019 the undersigned was wrongly posted out from Directorate of Social Welfare and posted as Social Welfare Officer at District Office, Charsadda (Notification copy attached). Meanwhile the undersigned submitted the case in Service Tribunal in Khyber Pakhtunkhwa plead the case / decided in favor of undersigned and the Department of Social Welfare issued Notification No. SOII(SWD)II-52/2021/6313-21 dated 08-06-2021 (Notification copy attached).

It is further added here that the Social Welfare Department again issued transfer Notification No. SOII(SWD)/11-52/2021 dated 27-06-2022 at S.No.07 of the undersigned and posted as Social Welfare Officer (BPS-17), District Office, Social Welfare Peshawar, wrongly / illegal post him during the closing financial year as per previous better practice, while as per nomenclature of the same post has not been mentioned in notification (as per job description to undersigned) (Notification copy attached), the job description of Social Welfare Officer has not been devised by the Social Welfare Department. In Directorate of Social Welfare an organize white collar gang is prevailing for the last many years simply for the reason they are not in favor of


30.6.2022 D.No = 2476

Secy: SW, Z&U, SE & WE Deptt:
Diary No: 2476
Dated: 30.6.2022

26

transparency, Rules & Regulations, once again attempted to route me out for their ill intentions to ensure purchases in token / miss appropriation of public fund by violating KPPRA Rules 2014 of the non-functional ADP schemes/current Budget tenders and ensured re-appropriation of ADP schemes to enhance the budget without the revision of PC-I/Regular Budget/grants etc. All of my transfer Notifications has been ensured in the month of June just for the sake of to split the budget in AC Bills and ground realities are empty, which clearly portrays in the M&E, Directorate of P&D Department poor performance reports and Audit reports done by the departmental Audit Committee notified by the competent authority of Social Welfare Department.

Furthermore, in transfer posting policy all the posting / transfer are made on the approval of Competent Authority, while the instant notification has been made by the Section Officer without observing the competencies / codal formalities by issuing order not filling of the vacant / cadre post of Planning Officer.

There are no charges/allegations levied against the undersigned, delay and lapses or any other irregularity against the Policy, Rules & Regulation etc.

Therefore, it is humbly requested that to accept my personal hearing / withdrawn my transfer order in the best public interest.


(ZIA ULLAH KHAN)
PLANNING OFFICER
DIRECTORATE OF SOCIAL WELFARE
KHYBER PAKHTUNKHWA

Copy for information to the: -

1. PA to Director, Directorate of Social Welfare Peshawar.

Dated: 29/06/2022


PLANNING OFFICER



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ZAKAT, USHR, SOCIAL WELFARE, SPECIAL EDUCATION
& WOMEN EMPOWERMENT DEPARTMENT**

Dated Peshawar the 3rd June, 2019.

NOTIFICATION:

21 Ahmed D

No: SOII/SWD/II-52/2018/*2818-25* The competent authority is pleased to order the transfer of Zia-Ullah Khan, Planning Officer (BS-17), Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa and to post him as Social Welfare Officer Charsadda against the vacant post in the interest of public service, with immediate effect

--Sd--

Secretary to Govt: of Khyber Pakhtunkhwa
Zakat, Ushr, Social Welfare, Special Education
& Women Empowerment Department.

Endst: of Even.No & Date:

Copy forwarded for information and further necessary action to the:

1. Accountant General Khyber Pakhtunkhwa.
2. Director, Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa.
3. Deputy Director (MIS), Social Welfare, Special Education & Women Empowerment Department.
4. District Officer Social Welfare Charsadda.
5. District Accounts Officer Charsadda.
6. PS to Secretary, Social Welfare, Special Education & Women Empowerment Department.
7. Officer concerned.
8. Personal file.
9. Master File.

Saud Rakhzai
(Muhammad Saud)
Section Officer-II

Annex E

22

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No. 1174/2019

Mr. Zia Ullah Khan S/O Hidayat Ullah Khan R/O Jamsheed Abad
Babu Ghari Chowk Warsak Road Peshawar.

(Petitioner)

V E R S U S

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Peshawar.
2. Secretary Establishment, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Secretary Finance, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Secretary Law and Justice, Govt of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
5. Secretary Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa, Peshawar.

(Respondents)

SERVICE APPEAL US 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER DATED 03.06.2019, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED FROM PLANING OFFICER, DIRECTORATE OF SOCIAL WELFARE SPECIAL EDUCATION & WOMEN EMPOWERMENT KHYBER PAKHTUNKHWA, TO SOCIAL WELFARE OFFICER CHARSAK, IS HIGHLY ILLEGAL, MALAFIDE, UNLAWFUL WITHOUT LAWFUL AUTHORITY, AGAINST THE RULES AND POLICY, , AGAINST WHICH DEPARTMENTAL APPEAL WAS FILED ON 12.06.2019, WHICH IS STILL NOT RESPONDED AFTER ELAPSE OF STATUTORY PERIOD OF 90 DAYS.

2

23

Prayer in Appeal:

On acceptance of this appeal the appellant may please be Posted at his original place of posting i.e. Planning Officer BPS-17 in Directorate Of Social Welfare Special Education & Women Empowerment Khyber Pakhtunkhwa, whereas the order issued by the secretary, legally not competent to issue the posting transfer of BPS-17 and above, thus declared to be illegal unlawful, without lawful authority, in violation of the rules and policy, against the express provision of law and having no legal effect.

Any other remedy deems proper may also be allowed not specifically asked, in the best interest of justice

Respectfully Sheweth:-

Brief facts of the instant appeal are as under:

1. That the appellant is the bonafide and local resident of Jamsheed Abad Babu Ghari Chowk Warsak Road Peshawar and a law abiding citizen of Pakistan.
2. That the appellant was serving in the (Social Welfare) Department as Planning Officer (BPS-17) in the Directorate of Social Welfare Special Education & Women Empowerment Khyber Pakhtunkhwa.
3. That appellant while serving the respondent department with great zeal and devotion without any complaint whatsoever from his superiors till date.

4. That the post of planning officer was created for the purpose to plan on evidence based facts, oversee the implementation of project and indicate bottlenecks in implementation process.
5. That the petitioner was serving the department in a capacity of Planning Officer BPS-17 in the Directorate of social welfare, special education & women empowerment Khyber Pakhtunkhwa with the entire zeal and devotion without any complainant what so ever.
6. That the Govt of Khyber Pakhtunkhwa published vide notification dated 22.02.2018 the service rules of the Khyber Pakhtunkhwa provincial planning service rules,2018 in which under section 9 Repeal and serving: (1) on coming into force of these rules, the service rules of the concerned line department shall stand repealed to the extent of the posts as given in schedule-I
(2) Any person appointed to a post specified in the schedule-I before the commencement of these rules shall, on commencement of these rules, be deemed for all intents and purposes to have been validly appointed under these rules on the authority of the planning and development as assigned to it under the Khyber Pakhtunkhwa govt rules of business 1985, and he/she affairs shall henceforth be administered by the planning and development department in accordance with these rules and any other rules for the time being in force and made applicable to him/her in accordance with Khyber Pakhtunkhwa govt rules of business,1985.(copy of the notification dated 22.02.2018 is attached as annexure A).
7. That the post of the petitioner clear reflects in the schedule 1 and according to the rule 3 of the rules , which clearly says in constitution of the service, service shall consist of the posts as specified in schedule-1 and such other posts as may be added it from time to time.
8. That the petitioner has all the requisite eligibility criteria qualification, experience in accordance with new provincial planning cell rules 2018, furthermore he is quite at par with officers of P&D

4

25

department as well planning cell of line department, who are administered under the provincial planning cell.

9. That the respondent Department vide Notification dated 22nd February 2018 promulgated the provincial planning cell whereas all the employees of the Provincial government who born on the strength of the planning and Development Department well merged into one department/group will be known as PS group and for such purpose PPS service rules were framed who can run the affairs of the PPS groups.
10. That the petitioner is serving in scale of BPS-17, whereas under the rules and posting transfer policy the competent authority for the purpose of posting and transfer of officials of BPS-17 and above the Chief Secretary of the Province is the competent authority to issue such orders or with the approval of Chief Secretary but the same office/authority was superseded by the office of Secretary respondent no 5 will fully deliberately with a Malafide intention as the appellant in question the corrupt practices of the officials for the upcoming month of June 2019.
11. That meanwhile the National Accountability bureau issued a letter addressing the appellant to come on 27.05.2019 to record his statement regarding grant an aid to Dost Welfare Foundation Peshawar of amounting rupees of 150 million and recorded his statement as per direction of the National Accountability bureau.
12. That the respondent Department in pursuance of the act of the appellant issued the single transfer notification dated 03.06.2019 and order the posting of the appellant as Social Welfare Officer District Charsadda, whereas the appellant was initially appointed through Public Service Commission against the post of specific designated

26

5

post of planning officer, furthermore he can be retain or posted against the post of planning officer only but malafidly posted/transferred as a social welfare officer.(Copy of the transfer order is attached as annexure as B).

13. That the appellant filed departmental appeal/representation against the impugned order 03.06.2019, while departmental appeal dated 12.06.2019, which is still not responded after elapse of statutory period of 90 days.(Copy of the departmental appeal dated 12.06.2019 is attached as annexure C).
14. That appellant approached this Hon'ble Tribunal against him illegal posting and transfer order inter alia on the following grounds

GRUNDS:-

- A. That appellant has not been treated in accordance with law and thus his rights secured and guaranteed under the law and constitution are badly violated.
- B. That the notification of posting and transfer is illegal issued, by the incompetent authority in the matter and also the appellant appointed through Public Service Commission particularly against the post of planning officer and can only be posted transferred as a planning officer, while in the impugned transferred order posted as Social Welfare Officer.
- C. That according to the posting and transfer policy of the Provincial Govt. all the posting of the Provincial Govt. all the posting transfer shall be strictly in public interest and shall not be abused/misused to victimise the Govt. servant, in case of present appellant. The order of posting/transfer was not issue in the mode and manner of the posting and transfer policy.

- D. That the petitioner is serving in scale of BPS-17, whereas under the rules and posting transfer policy the competent authority for the purpose of posting and transfer of officials of BPS-17 and above the Chief Secretary of the Province is the competent authority to issue such orders or with the approval of Chief Secretary but the same office/authority was superseded by the office of Secretary respondent no 5 will fully deliberately with a Malafide intention as the appellant in question the corrupt practices of the officials for the upcoming month of June 2019.
- E. That meanwhile the National Accountability bureau issued a letter addressing the appellant to come on 27.05.2019 to record his statement regarding grant an aid to Dost Welfare Foundation Peshawar of amounting rupees of 150 million and recorded his statement as per direction of the National Accountability bureau.
- F. That the respondent Department in pursuance of the act of the appellant issued the single transfer notification dated 03.06.2019 and order the posting of the appellant as Social Welfare Officer District Charsadda, whereas the appellant was initially appointed through Public Service Commission against the post of specific designated post of planning officer, furthermore he can be retain or posted against the post of planning officer only but malafidely posted/transferred as a social welfare officer
- G. That the impugned order was issued politically motivate as to adjust their own blue eyed ones.
- H. That there is no complaint whatsoever against the appellant and performing his duty with great zeal and devotion.
- I. That in fact there exists no exigencies of service nor the order of transfer cannot be termed as in the public interest it is a result of

7

28

adjustment of their own blue eyed ones at the cost of the appellant, and this not tenable in the eyes of law.

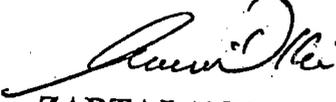
- J. That appellant seeks the permission of this Hon'ble Tribunal to rely to additional grounds at the hearings of this petition.

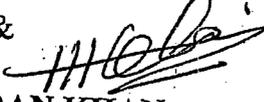
It is, therefore humbly prayed that, On acceptance of this appeal the appellant may please be Posted at his original place of posting i.e. Planning Officer BPS-17 in Directorate Of Social Welfare Special Education & Women Empowerment Khyber Pakhtunkhwa, whereas the order issued by the secretary, legally not competent to issue the posting transfer of BPS-17 and above, thus declared to be illegal unlawful, without lawful authority, in violation of the rules and policy, against the express provision of law and having no legal effect.

Any other remedy deems proper may also be allowed not specifically asked, in the best interest of justice

Appellant

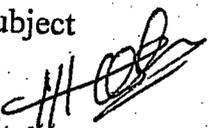
Through


ZARTAJ ANWAR
Advocate Peshawar

&

IMRAN KHAN
Advocate Peshawar

Certificate

It is certified that as per instruction of my client no such like appeal has earlier been file on the same subject matter between the same parties


Advocate

NC21039 (032)
SOCIAL WELFARE, SPECIAL EDUCATION

108101 SOCIAL WELFARE MEASURES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
10 SOCIAL PROTECTION					
108 OTHERS					
1081 OTHERS					
108101 SOCIAL WELFARE MEASURES					
PR4359 Social Welfare Provincial					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>43,429,000</u>	<u>58,194,000</u>	<u>58,698,000</u>
A011 TOTAL PAY	93	93	<u>24,151,000</u>	<u>25,144,000</u>	<u>25,374,000</u>
A011-1 TOTAL PAY OF OFFICERS	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
A01101 Total Basic Pay Of Officer	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
D063 Director (BPS-19)	1	1	667,000		701,000
D028 Deputy Director (BPS-18)	2	2	1,310,000		1,376,000
A079 Assistant Director (BPS-17)	8	8	3,809,000		4,000,000
A383 Assistant Director Women Development (BPS-17)	1	1	459,000		482,000
✓ P038 Planning Officer (BPS-17)	1	1	551,000		579,000
P087 Project Manager (BPS-17)	1	1	301,000		317,000
S090 Social Welfare Officer (BPS-17)	1	1	231,000		243,000
S166 Superintendent (BPS-17)	3	3	900,000		945,000
A057 Assistant (BPS-16)	10	10	2,993,000		3,143,000
C082 Computer Operator (BPS-16)	4	4	882,000		927,000
F043 Field Officer (BPS-16)	1	1	214,000		225,000
I024 Investigator (BPS-16)	1	1	429,000		451,000
M161 Marketing Officer (BPS-16)	1	1	262,000		276,000
S061 Senior Scale Stenographer (BPS-16)	3	3	1,065,000		1,119,000
S152 Supervisor (BPS-16)	1	1	222,000		234,000
A011-2 TOTAL PAY OF OTHER STAFF	54	54	<u>9,856,000</u>	<u>8,378,000</u>	<u>10,356,000</u>
A01151 Total Basic Pay Other Staff	54	54	<u>9,852,000</u>	<u>8,378,000</u>	<u>10,351,000</u>
J024 Junior Scale Stenographer (BPS-14)	7	7	1,265,000		1,329,000
S035 Senior Clerk (BPS-14)	5	5	1,538,000		1,615,000
J013 Junior Clerk (BPS-11)	11	11	2,081,000		2,186,000
S318 Sale Assistant (BPS-11)	1	1	291,000		306,000

NC21039 (032)
SOCIAL WELFARE, SPECIAL EDUCATION

108101 SOCIAL WELFARE MEASURES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
10 SOCIAL PROTECTION					
108 OTHERS					
1081 OTHERS					
108101 SOCIAL WELFARE MEASURES					
PR4359 Social Welfare Provincial					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>43,429,000</u>	<u>58,194,000</u>	<u>58,698,000</u>
A011 TOTAL PAY	93	93	<u>24,151,000</u>	<u>25,144,000</u>	<u>25,374,000</u>
A011-1 TOTAL PAY OF OFFICERS	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
A01101 Total Basic Pay Of Officer	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
D063 Director (BPS-19)	1	1	667,000		701,000
D028 Deputy Director (BPS-18)	2	2	1,310,000		1,376,000
A079 Assistant Director (BPS-17)	8	8	3,809,000		4,000,000
A383 Assistant Director Women Development (BPS-17)	1	1	459,000		482,000
P038 Planning Officer (BPS-17)	1	1	551,000		579,000
P087 Project Manager (BPS-17)	1	1	301,000		317,000
S090 Social Welfare Officer (BPS-17)	1	1	231,000		243,000
S166 Superintendent (BPS-17)	3	3	900,000		945,000
A057 Assistant (BPS-16)	10	10	2,993,000		3,143,000
C082 Computer Operator (BPS-16)	4	4	882,000		927,000
F043 Field Officer (BPS-16)	1	1	214,000		225,000
I024 Investigator (BPS-16)	1	1	429,000		451,000
M161 Marketing Officer (BPS-16)	1	1	262,000		276,000
S061 Senior Scale Stenographer (BPS-16)	3	3	1,065,000		1,119,000
S152 Supervisor (BPS-16)	1	1	222,000		234,000
A011-2 TOTAL PAY OF OTHER STAFF	54	54	<u>9,856,000</u>	<u>8,378,000</u>	<u>10,356,000</u>
A01151 Total Basic Pay Other Staff	54	54	<u>9,852,000</u>	<u>8,378,000</u>	<u>10,351,000</u>
J024 Junior Scale Stenographer (BPS-14)	7	7	1,265,000		1,329,000
S035 Senior Clerk (BPS-14)	5	5	1,538,000		1,615,000
J013 Junior Clerk (BPS-11)	11	11	2,081,000		2,186,000
S318 Sale Assistant (BPS-11)	1	1	291,000		306,000

NC21039 (032)
SOCIAL WELFARE, SPECIAL EDUCATION

108101 SOCIAL WELFARE MEASURES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
				Rs	Rs
10 SOCIAL PROTECTION					
108 OTHERS					
1081 OTHERS					
108101 SOCIAL WELFARE MEASURES					
PR4359 Social Welfare Provincial					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>43,429,000</u>	<u>58,194,000</u>	<u>58,698,000</u>
A011 TOTAL PAY	93	93	<u>24,151,000</u>	<u>25,144,000</u>	<u>25,374,000</u>
A011-1 TOTAL PAY OF OFFICERS	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
A01101 Total Basic Pay Of Officer	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
D063 Director (BPS-19)	1	1	667,000		701,000
D028 Deputy Director (BPS-18)	2	2	1,310,000		1,376,000
A079 Assistant Director (BPS-17)	8	8	3,809,000		4,000,000
A383 Assistant Director Women Development (BPS-17)	1	1	459,000		482,000
P038 Planning Officer (BPS-17)	1	1	551,000		579,000
P087 Project Manager (BPS-17)	1	1	301,000		317,000
S090 Social Welfare Officer (BPS-17)	1	1	231,000		243,000
S166 Superintendent (BPS-17)	3	3	900,000		945,000
A057 Assistant (BPS-16)	10	10	2,993,000		3,143,000
C082 Computer Operator (BPS-16)	4	4	882,000		927,000
F043 Field Officer (BPS-16)	1	1	214,000		225,000
I024 Investigator (BPS-16)	1	1	429,000		451,000
M161 Marketing Officer (BPS-16)	1	1	262,000		276,000
S061 Senior Scale Stenographer (BPS-16)	3	3	1,065,000		1,119,000
S152 Supervisor (BPS-16)	1	1	222,000		234,000
A011-2 TOTAL PAY OF OTHER STAFF	54	54	<u>9,856,000</u>	<u>8,378,000</u>	<u>10,356,000</u>
A01151 Total Basic Pay Other Staff	54	54	<u>9,852,000</u>	<u>8,378,000</u>	<u>10,351,000</u>
J024 Junior Scale Stenographer (BPS-14)	7	7	1,265,000		1,329,000
S035 Senior Clerk (BPS-14)	5	5	1,538,000		1,615,000
J013 Junior Clerk (BPS-11)	11	11	2,081,000		2,186,000
S318 Sale Assistant (BPS-11)	1	1	291,000		306,000

NC21039 (032)
SOCIAL WELFARE, SPECIAL EDUCATION

108101 SOCIAL WELFARE MEASURES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
10 SOCIAL PROTECTION					
108 OTHERS					
1081 OTHERS					
108101 SOCIAL WELFARE MEASURES					
PR4359 Social Welfare Provincial					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>43,429,000</u>	<u>58,194,000</u>	<u>58,698,000</u>
A011 TOTAL PAY	93	93	<u>24,151,000</u>	<u>25,144,000</u>	<u>25,374,000</u>
A011-1 TOTAL PAY OF OFFICERS	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
A01101 Total Basic Pay Of Officer	39	39	<u>14,295,000</u>	<u>16,766,000</u>	<u>15,018,000</u>
D063 Director (BPS-19)	1	1	667,000		701,000
D028 Deputy Director (BPS-18)	2	2	1,310,000		1,376,000
A079 Assistant Director (BPS-17)	8	8	3,809,000		4,000,000
A383 Assistant Director Women Development (BPS-17)	1	1	459,000		482,000
P038 Planning Officer (BPS-17)	1	1	551,000		579,000
P087 Project Manager (BPS-17)	1	1	301,000		317,000
S090 Social Welfare Officer (BPS-17)	1	1	231,000		243,000
S166 Superintendent (BPS-17)	3	3	900,000		945,000
A057 Assistant (BPS-16)	10	10	2,993,000		3,143,000
C082 Computer Operator (BPS-16)	4	4	882,000		927,000
F043 Field Officer (BPS-16)	1	1	214,000		225,000
I024 Investigator (BPS-16)	1	1	429,000		451,000
M161 Marketing Officer (BPS-16)	1	1	262,000		276,000
S061 Senior Scale Stenographer (BPS-16)	3	3	1,065,000		1,119,000
S152 Supervisor (BPS-16)	1	1	222,000		234,000
A011-2 TOTAL PAY OF OTHER STAFF	54	54	<u>9,856,000</u>	<u>8,378,000</u>	<u>10,356,000</u>
A01151 Total Basic Pay Other Staff	54	54	<u>9,852,000</u>	<u>8,378,000</u>	<u>10,351,000</u>
J024 Junior Scale Stenographer (BPS-14)	7	7	1,265,000		1,329,000
S035 Senior Clerk (BPS-14)	5	5	1,538,000		1,615,000
J013 Junior Clerk (BPS-11)	11	11	2,081,000		2,186,000
S318 Sale Assistant (BPS-11)	1	1	291,000		306,000

NC21039 (032)
SOCIAL WELFARE, SPECIAL EDUCATION

107104 ADMINISTRATION

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
10 SOCIAL PROTECTION					
107 ADMINISTRATION					
1071 ADMINISTRATION					
107104 ADMINISTRATION					
PR4357 Social Welfare Secretariat					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			<u>65,232,000</u>	<u>75,710,000</u>	<u>82,471,000</u>
A011 TOTAL PAY	89	88	<u>28,287,000</u>	<u>25,411,000</u>	<u>29,716,000</u>
A011-1 TOTAL PAY OF OFFICERS	39	38	<u>19,971,000</u>	<u>19,292,000</u>	<u>20,979,000</u>
A01101 Total Basic Pay Of Officer	39	38	<u>19,892,000</u>	<u>19,178,000</u>	<u>20,895,000</u>
S014 Secretary (BPS-20)	1	1	1,241,000		1,304,000
A018 Additional Secretary (BPS-19)	1	1	1,097,000		1,152,000
D052 Deputy Secretary (BPS-18)	2	2	1,475,000		1,549,000
D401 Deputy Director - IT (BPS-18)	1	1	936,000		983,000
G045 Gender Specialist (BPS-18)	2	2	1,594,000		1,674,000
S058 Senior Planning Officer (BPS-18)	1	1	936,000		983,000
A513 Assistant Director (IT) (BPS-17)	1	1	403,000		424,000
G046 Gender Analyst (BPS-17)	1	1	702,000		738,000
M084 Monitoring Officer (BPS-17)	1	1	529,000		556,000
P038 Planning Officer (BPS-17)	1	1	529,000		556,000
P075 Private Secretary (BPS-17)	1	1	638,000		670,000
P084 Programmer (BPS-17)	1	1	417,000		438,000
S022 Section Officer (BPS-17)	6	6	3,490,000		3,665,000
S166 Superintendent (BPS-17)	3	3	1,339,000		1,406,000
A057 Assistant (BPS-16)	8	8	2,167,000		2,276,000
A369 Assistant Programmer (BPS-16)	1		315,000		
C082 Computer Operator (BPS-16)	4	4	1,269,000		1,664,000
P021 Personal Assistant (BPS-16)	1	1	272,000		286,000
S061 Senior Scale Stenographer (BPS-16)	2	2	543,000		571,000
A01102 Personal pay			24,000	63,000	26,000
A01103 Special Pay			38,000	27,000	40,000
A01105 Qualification Pay			17,000	24,000	18,000

39

GOVERNMENT OF KHYBER PAKHTUNKHWA
SOCIAL WELFARE SPECIAL EDUCATION & WOMEN
EMPOWERMENT DEPARTMENT

Dated Peshawar the 31st May, 2012

DECLARATION:

(SW)II-52/2011/7284-90 On the recommendation of Khyber Pakhtunkhwa Public Service Commission and acceptance of the Terms & Conditions offered vide letter No. SOII(SW)II-7267-69, dated 30-05-2012, the competent authority is pleased to appoint Mr. Zia Ullah Hidayat Ullah Khan, House No. 449-450/D Mohallah Abkari near Lady Park, District Peshawar as Planning Officer (B-17) in the Directorate of Social Welfare, Special Education & Empowerment Khyber Pakhtunkhwa with immediate effect.

- sct -

SECRETARY

Government of Khyber Pakhtunkhwa,
Social Welfare, Special Education & Women
Empowerment Department.

Copy of Even No. and Date:

Forwarded for information to the :-

1. Accountant General, Khyber Pakhtunkhwa.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department
4. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
5. Director, Social Welfare & Women Empowerment, Khyber Pakhtunkhwa.
6. Officer concerned.
7. Personal file.


(Pir Muhammad Mahsud)
Section Officer-II



GOVERNMENT OF KHYBER PAKHTUNKHWA
ZAKAT, USHR, SOCIAL WELFARE, SPECIAL EDUCATION
& WOMEN EMPOWERMENT DEPARTMENT

Dated Peshawar the 8th June, 2021

35

NOTIFICATION:

No: SOII/SWD/II-52/2021/6313-21, Consequent upon the approval of the competent authority Mr. Zia Ullah Khan, Social Welfare Officer, Charsadda is hereby transferred /adjusted against the vacant post of Planning Officer, Directorate of Social Welfare with immediate effect.

**Secretary to Govt: of Khyber Pakhtunkhwa
Zakat, Ushr, Social Welfare, Special Education
& Women Empowerment Department**

Endst: of Even No & Date:

Copy forwarded for information and further necessary action to the:

1. Registrar, Service Tribunal, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa
3. Director, Social Welfare, Khyber Pakhtunkhwa.
4. Deputy Director (MIS), SW, SE & WE Department.
5. District Account Officer, Charsadda.
6. District Officer Social Welfare, Charsadda.
7. Section Officer (lit) SWD.
8. PS to Secretary, Social Welfare, Department.
9. Officer concerned.


Section Officer-II 8/06/2021

Handwritten notes:
Dated
M/W

3343
9/6/21

2/166



GOVERNMENT OF KHYBER PAKHTUNKHWA
SOCIAL WELFARE, SPECIAL EDUCATION
& WOMEN EMPOWERMENT DEPARTMENT

36

Dated Peshawar the 27th June, 2022

NOTIFICATION:

No. SQII(SW) II-52/2021/-The competent authority (Secretary Social Welfare Department) is pleased to order the postings / transfers of the following officers of Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa in the best of public interest with immediate effect:-

S. No	Name & Designation	From	To
1	Mr. Muhammad Jamshed Khan, Social Welfare Officer (BPS-18 P)	District Officer, Social Welfare Bannu.	Deputy Director, Special Education Complex, Peshawar vice S.No.2
2	Mr. Jamal Shah Social Welfare Officer (BPS-17)	Deputy Director, Special Education Complex Peshawar	District Officer, Social Welfare Mardan. vice S.No.3
3	Abdur Rashid, Social Welfare Officer (BPS-18-P)	District Social Welfare Officer, Mardan	Deputy Director, Special Education Charsadda. vice S.No.4
4	Mr. Jaffar Khan, Rehabilitation Officer (BPS-18 P)	Deputy Director, Special Education Charsadda	District Officer, Social Welfare, Swat vice S.No.5
5	Ms. Nusrat Iqbal Superintendent (BPS-17)	District Officer, Social Welfare, Swat	Superintendent, Darul Aman Swat vice S.No.6
6	Ms. Rehana Special Education Teacher	Superintendent, Darul Aman Swat	Senior Teacher, Special Education Centre, Swat against the vacant post.
7	Mr. Zia Ullah, Planning Officer (BPS-17)	Planning Officer, Directorate of Social Welfare, Peshawar	Social Welfare Officer, Peshawar against the vacant post.
8	Miss Mahnoor Masroor, Social Case Worker (BPS-16)	Computer Operator, District Office Mansehra	Senior Special Education Teacher, School for MR&PH Mansehra

Secretary to Govt. of Khyber Pakhtunkhwa
Zakat, Usher, Social Welfare, Special Education &
Women Empowerment Department.

Endnt: of Even No & Date:

Copy forwarded for information and further necessary action to the

1. Accountant General, Khyber Pakhtunkhwa.
2. Director Social Welfare, Khyber Pakhtunkhwa.
3. Deputy Director MIS cell, Social Welfare, Department.
4. District Officer Social Welfare concerned.
5. District Account Officer concerned.
6. PS to Minister for Social Welfare, Khyber Pakhtunkhwa.
7. PS to Secretary, Social Welfare, Department.
8. Officers concerned.


(ALEM ZEB) 27/6/22
Section Officer-II

11-110 = 2786
22. 2. 22

37

To,

The Secretary,
Social Welfare, Special Education & Women Empowerment,
Department, Khyber Pakhtunkhwa, Peshawar.

Subject: - APPEAL REGARDING IMPUGNED TRANSFER AS SOCIAL WELFARE OFFICER FROM THE CADRE POST OF PLANNING OFFICER.

Respected Madam,

It is brought into your kind notice that the undersigned has selected through Public Service Commission Khyber Pakhtunkhwa as Planning Officer (BPS-17) and the Competent Authority of Social Welfare Department issued my appointment Notification No. SOII(SWD)/11-52/ 2011/2784-90 dated 31-05-2012 as Planning Officer (BPS-17) in Directorate of Social Welfare (Notification Copy attached).

In this connection, it is submitted that the post of Planning Officer was created for the purpose to plan on evidence based facts, oversee the implementation of project and indicate bottlenecks in implementation process. On dated 03.06.2019 the undersigned was wrongly posted out from Directorate of Social Welfare and posted as Social Welfare Officer at District Office, Charsadda (Notification copy attached). Meanwhile the undersigned submitted the case in Service Tribunal in Khyber Pakhtunkhwa, *the Chairman Service Tribunal on dated 03-06-2021 were required to produce summary culminating into notification 30.06.2019 along with seniority list, job description of Social Welfare Officer / Planning Officer etc by today, another request were made for adjournment in order to produce not only the above mentioned documents but also proper transfer order keeping in view the qualification and nature of service of the appellant.* Inter alia that on dated 08-06-2021 the Social Welfare Department issued the notification of the appellant to actual post of Planning Officer and produce the same to the Chairman of the Service Tribunal on 14-06-2021, resolve the issue the then the appellant accepted the order before the Honorable Court and give written statement that the appellant have no grievance against the Department (Court Order sheet, application & month pay slip copy attached).

It is further added here that the Social Welfare Department again issued transfer Notification No. SOII(SWD)/11-52/2021 dated 27-06-2022 at S.No.07 of the undersigned and posted as Social Welfare Officer (BPS-17), District Office, Social Welfare Peshawar, wrongly / illegal and based on malafide-intention post him during the closing financial year as per previous better practice, while as per nomenclature of the same post has not been mentioned in notification

58

(as per job description to undersigned) (**Notification copy attached**), the job description of Social Welfare Officer has not been devised by the Social Welfare Department. In Directorate of Social Welfare an organize white collar gang is prevailing for the last many years simply for the reason they are not in favor of transparency, Rules & Regulations, once again attempted to route me out for their ill intentions to ensure purchases in token / miss appropriation of public fund by violating KPPRA Rules 2014 of the non-functional ADP schemes/current Budget tenders and ensured re-appropriation of ADP schemes to enhance the budget without the revision of PC-I/Regular Budget/grants etc. All of my transfer Notifications has been ensured in the month of June just for the sake of to split the budget in AC Bills and ground realities are empty, which clearly portrays in the M&E, Directorate of P&D Department poor performance reports and Audit reports done by the departmental Audit Committee notified by the competent authority of Social Welfare Department.

Furthermore, in transfer posting policy all the posting / transfer are made on the approval of Competent Authority, while the instant notification has been made by the Section Officer without observing the competencies / codal formalities by issuing order not filling of the vacant / cadre post of Planning Officer.

There are no charges/allegations levied against the undersigned, delay and lapses or any other irregularity against the Policy, Rules & Regulation etc.

Therefore, it is humbly requested that to accept my personal hearing / withdrawn my transfer order in the best public interest.


(ZIA ULLAH KHAN)
PLANNING OFFICER
DIRECTORATE OF SOCIAL WELFARE
KHYBER PAKHTUNKHWA

Copy for information to the: -

1. PA to Director, Directorate of Social Welfare Peshawar.

Dated: ____/____/2022


PLANNING OFFICER



GOVERNMENT OF KHYBER PAKHTUNKHWA
 SOCIAL WELFARE SPECIAL EDUCATION & WOMEN
 EMPOWERMENT DEPARTMENT 39

Dated Peshawar the 31st May, 2012

NOTIFICATION:

NO.SOII(SW)II-52/2011/7284-90 On the recommendation of Khyber Pakhtunkhwa Public Service Commission and acceptance of the Terms & Conditions offered vide letter No. SOII(SW)II-52/2011/7267-69, dated 30-05-2012, the competent authority is pleased to appoint Mr. Zia Ullah Khan S/O Hidayat Ullah Khan, House No. 449-450/D Mohallah Abkari, near Lady Park, District Bannu as Planning Officer (B-17) in the Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa with immediate effect.

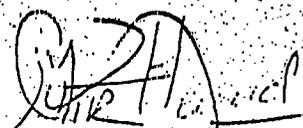
-scl-
 SECRETARY

Government of Khyber Pakhtunkhwa,
 Social Welfare, Special Education & Women
 Empowerment Department

Endst: of Even No. and Date:

Copy forwarded for information to the :-

1. Accountant General, Khyber Pakhtunkhwa.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
5. Director, Social Welfare & Women Empowerment, Khyber Pakhtunkhwa.
- ✓ 6. Officer concerned.
7. Personal file.


 (Pir Muhammad Mahsud)
 Section Officer-II

14

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (June-2022)

U6



Personal Information of Mr ZIA ULLAH KHAN d/w/s of HIDAYAT ULLAH KHAN

Personnel Number: 00176699 CNIC: 1110114284159 NTN: 2239644-6
Date of Birth: 02.10.1969 Entry into Govt. Service: 16.01.1998 Length of Service: 24 Years 05 Months 016 Days

Employment Category: Active Temporary

Designation: PLANNING OFFICER 80003906-GOVERNMENT OF KHYBER PAKH
DDO Code: PR4359-DIRECTORATE OF SOCIAL WELFARE, SPECIAL EDU: & WOMEN EMPOVERMENT KP
Payroll Section: 010 GPF Section: 004 Cash Center:
GPF A/C No: 4EDUORK GPF Interest applied **GPF Balance:** 455,510.00 (provisional)
Vendor Number: 30434870 - ZIA ULLAH KHAN SOCIAL WELFEAR OF CHARSAJDA
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	76,370.00	1210	Convey Allowance 2005	5,000.00
1897	Housing Subsidy Allowance	18,465.00	1947	Medical Allow 15% (16-22)	3,095.00
2148	15% Adhoc Relief All-2013	1,580.00	2199	Adhoc Relief Allow @10%	1,063.00
2211	Adhoc Relief All 2016 10%	5,439.00	2224	Adhoc Relief All 2017 10%	7,637.00
2247	Adhoc Relief All 2018 10%	7,637.00	2265	Adhoc Relief All 2019 05%	3,818.00
2309	Adhoc Relief All 2021 10%	7,637.00	2315	Special Allowance 2021	6,074.00
2341	Dispr. Red All 15% 2022KP	11,455.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3017	GPF Subscription	-4,270.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-7,414.00	4004	R. Benefits & Death Comp:	-900.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	520,000.00	-20,000.00	500,000.00

Deductions - Income Tax

Payable: 72,962.70 Recovered till JUN-2022: 72,963.00 Exempted: 0.30- Recoverable: 0.00

Gross Pay (Rs.): 155,270.00 Deductions: (Rs.): -34,084.00 Net Pay: (Rs.): 121,186.00

Payee Name: ZIA ULLAH KHAN
Account Number: 4004213092
Bank Details: NATIONAL BANK OF PAKISTAN, 230986 CIVIL SECRETARIAT CIVIL SECRETARIAT, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: BANNU
City: BANNU Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: City: Email: ziaullahwazir69@gmail.com



GOVERNMENT OF KHYBER PAKHTUNKHWA
ZAKAT, USHR, SOCIAL WELFARE, SPECIAL EDUCATION
& WOMEN EMPOWERMENT DEPARTMENT

Dated Peshawar the 8th June, 2021

41

NOTIFICATION:

No: SOII/SWD/II-52/2021/6313-21, Consequent upon the approval of the competent authority Mr. Zia Ullah Khan, Social Welfare Officer, Charsadda is hereby transferred / adjusted against the vacant post of Planning Officer, Directorate of Social Welfare with immediate effect.

**Secretary to Govt: of Khyber Pakhtunkhwa
Zakat, Ushr, Social Welfare, Special Education
& Women Empowerment Department**

Endst: of Even No & Date:

Copy forwarded for information and further necessary action to the:

1. Registrar, Service Tribunal, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa
3. Director, Social Welfare, Khyber Pakhtunkhwa.
4. Deputy Director (MIS), SW, SE & WE Department.
5. District Account Officer, Charsadda.
6. District Officer Social Welfare, Charsadda.
7. Section Officer (lit) SWD.
8. PS to Secretary, Social Welfare, Department.
9. Officer concerned.


Section Officer-II 8/06/2021



3343
9/6/21

2/166

Posting and Transfer

Statutory Provision.

Section 10 of the NWFP Civil Servants Act, 1973.

Posting and Transfer. Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

Posting/transfer policy of the Provincial Government.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive/hard areas shall be reduced to two (02) years for settled areas, 01½ years for unattractive areas and one year for hard areas.
- v) ⁷⁹[]

⁷⁹ Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No. SOR-VI (E&AD) 1-4/2008/Vol-VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make Posting/Transfer subject to observance of the policy and rules.

- vi) ⁸⁰While making posting/transfers of officers/officials up to BS-17 from settled areas to FATA and vice versa approval of the Chief Secretary, NWFP needs to be obtained. Save Tehsildars/Naib Tehsildars within a division in respect of whom the concerned Commissioner will exercise the same power. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor, NWFP shall be obtained.

Provided that the power to transfer Political Tehsildars and Political Naib Tehsildars within FATA between different divisions shall rest in Additional Chief Secretary FATA.

- vi (a) All Officers/officials selected against Zone-I/FATA quota in the Provincial Services should compulsorily serve in FATA for at least eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.
- viii) No posting/transfers of the officers/officials on detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/ transfer of the unmarried female government Servants at the station of the residence of their parents.
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement

80

Para-VI added vide circular letter No. SOR-VI/E&AD/1-4/2010/Vol-VIII dated 20th March, 2010.

⁸¹ DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;

- xii) In terms of Rule 17(1) and (2) read with Schedule-II of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

Outside the Secretariat		
1.	Officers of the all Pakistan Unified Group i.e. DMG. PSP including Provincial Police Officers in BPS-18 and above.	Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister.
2.	Other officers in BPS-17 and above to be posted against scheduled posts, or posts normally held by the APUG, PCS(EG) and PCS(SG).	-do-
3.	Heads of Attached Departments and other Officers in B-19 & above in all the Departments.	-do-
In the Secretariat		
1.	Secretaries	Chief Secretary with the approval of the Chief Minister.
2.	Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another.	Secretary of the Department concerned. Chief secretary/Secretary Establishment.
3.	Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another	Secretary of the Department concerned. Secretary of the Department in consultation with Head of Attached Department concerned. Secretary (Establishment)

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/ officials be considered.
 - b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

⁸¹ Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

US

xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

- i) Pre-mature posting/transfer or posting transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule - IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each are as under:-

S. No.	Officers	Authority
1.	Posting of District Coordination Officer and Executive District Officer in a District.	Provincial Government.
2.	Posting of District Police Officer.	Provincial Government
3.	Other Officers in BPS-17 and above posted in the District.	Provincial Government
4.	Official in BPS-16 and below	Executive District Officer in consultation with District Coordination Officer.

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed/implemented.

5. All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

(Authority: Letter No: SOR-VI/E&AD/1-4/2003 dated 24-6-2003).

4/6

PLACEMENT POLICY.

In order to utilize the expertise of the officers who have received foreign training in various fields, the provincial Government has decided to adopt the Placement Policy, approved by the Prime Minister of Pakistan, and make it a part of its Posting/Transfer Policy. Placement Policy is as follows:-

- i) All placements would be made on the basis of merit and keeping in view the needs of the organization.
- ii) The first priority in placement must go to the parent organization of the participant from where the individual had applied. This will be in consonance with the concept of establishing the "Need" for the department and fulfilling the need through "capacity building for the organization.
- iii) In order to follow the "bottom up approach" for Devolution, the priority within departments must go to the Districts, the Provinces and then the Federal Government.
- iv) The second priority in placement should go to up-grading the existing training Institution within the country. The knowledge gained by the officers, will be of immense value to bring about a qualitative change in the training institutions. The following proposals are made in this regard:
 - a) Permanent posting of an officer to the training institutions for 2-3 years;
 - b) Temporary attachment with the training institutions for 3 to 6 months for some research project on helping in developing case studies;
 - c) Earmarked as a visiting faculty member for specific subject.
- v) Individuals posted to their parent organizations will also organize training for their subordinates within the department, in order to transfer the knowledge and bring about a qualitative change internally;
- vi) The Normal tenure of posting as already provided in the policy would be ensured;
- vii) No participant should be allowed to be posted on deputation to multinational donor agencies for at least 5 years;
- viii) No participants will decline/represent against his/her posting.

⁸² Placement Policy has been made part of the posting/transfer policy vide Urdu circular No.SOR-VI(E&AD)1-4/06, dated 9-2-2007

0346586600

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

SPECIMEN NOTIFICATION.

GOVERNMENT OF NWFP
NAME OF ADMINISTRATIVE
DEPARTMENT

Dated Peshawar, _____

NOTIFICATION

NO. _____ The Competent Authority is pleased to order the transfer of Mr. _____

Department and to post him as _____ in the interest of public service, with immediate effect.

CHIEF SECRETARY
GOVERNMENT OF NWFP

Endst. No. and date even.

Copy forwarded

- 1.
- 2.
- 3.
- 4.

(NAME)
SECTION OFFICER
Administrative Department

(Authority: Letter No. SO (E-I) E&AD/9-12/2006 dated 22-12-2006)

48

CHARGE RELINQUISH REPORT

In compliance of Administrative Department Notification No. SOII(SW)II-52/2021 dated 27.02.2022, I Zia Ullah Khan, Planning Officer (BPS-17), Directorate of Social Welfare, SE & WE Khyber Pakhtunkhwa relinquish the charge of the post of Planning Officer, Directorate of Social Welfare Peshawar today on dated 30.06.2022 (A.N).


(ZIA ULLAH KHAN) 30-06-2022
PLANNING OFFICER
Directorate of Social Welfare
Peshawar

Endst: of even No.& date.

Copy forwarded for information and further necessary action to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director, Social Welfare, Khyber Pakhtunkhwa.
3. Deputy Director, MIS Cell, Social Welfare Department.
4. District Officer, Social Welfare, SE & WE, Peshawar.
5. PS to Secretary, Social Welfare, SE & WE Department Peshawar.


(ZIA ULLAH KHAN)
PLANNING OFFICER
Directorate of Social Welfare
Peshawar

49

CHARGE ASSUMPTION REPORT

In compliance of Administrative Department Notification No. SOII(SW)II-52/2021 dated 27.02.2022, I Zia Ullah Khan, Planning Officer (BPS-17), Directorate of Social Welfare, SE & WE Khyber Pakhtunkhwa assumed the charge of the post of Social Welfare Officer, District Office, Social Welfare Peshawar today on dated 01.07.2022 (F.N).


(ZIA ULLAH KHAN) 01/07/2022
PLANNING OFFICER
Directorate of Social Welfare
Peshawar

Endst: of even No.& date.

Copy forwarded for information and further necessary action to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director, Social Welfare, Khyber Pakhtunkhwa.
3. Deputy Director, MIS Cell, Social Welfare Department.
4. District Officer, Social Welfare, SE & WE, Peshawar.
5. PS to Secretary, Social Welfare, SE & WE Department Peshawar.


(ZIA ULLAH KHAN) 01/07/2022
PLANNING OFFICER
Directorate of Social Welfare
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ZAKAT, USHR, SOCIAL WELFARE, SPECIAL EDUCATION
 & WOMEN EMPOWERMENT DEPARTMENT

Dated Peshawar the 3rd June, 2019.

50

CERTIFICATION:

SOII/SWD/II-52/2018/2818-25 The competent authority is pleased to order the transfer of
 Zia-Ullah Khan, Planning Officer (BS-17), Directorate of Social Welfare, Special Education &
 Women Empowerment Khyber Pakhtunkhwa and to post him as Social Welfare Officer
 Charsadda against the vacant post in the interest of public service, with immediate effect

--Sd--

Secretary to Govt: of Khyber Pakhtunkhwa
 Zakat, Ushr, Social Welfare, Special Education
 & Women Empowerment Department.

List of Even No & Date:

Copy forwarded for information and further necessary action to the:

1. Accountant General Khyber Pakhtunkhwa.
2. Director, Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa.
3. Deputy Director (MIS), Social Welfare, Special Education & Women Empowerment Department.
4. District Officer Social Welfare Charsadda.
5. District Accounts Officer Charsadda.
6. PS to Secretary, Social Welfare, Special Education & Women Empowerment Department.
7. Officer concerned.
8. Personal file.
9. Master File.

Muhammad Saud
 (Muhammad Saud)
 Section Officer-II

ADP I
12/6
for

Directorate of
 Social Welfare K.P.K.
 No: 13067
 Date: 11-6-19

2/166

Dist. Govt. KP-Provincial
District Accounts Office Peshawar Dist.
Monthly Salary Statement (September-2023)



51

Personal Information of Mr ZIA HILAH KHAN *Wife of* Hidayat Ullah Khan

Personnel Number: 00176699 CNIC: 111014284159 MFN: 22396446
Date of Birth: 02.10.1969 Entry into Govt. Service: 16.01.1998 Length of Service: 34 Years 08 Months 016 Days

Employment Category: Active Temporary

Designation: 4004143-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6166-DISTRICT OFFICER SOCIAL WELFARE DEP.TT: PESHAWAR

Payroll Section: 004 GPF Section: 004 Cash Center:

GPF A/C No: 4EDUORR GPF Interest applied: GPF Balance: 7,224.00 (provisional)

Vendor Number: 30434870 - ZIA ULLAH KHAN SOCIAL WELFARE OF CHARSAJDA

Pay and Allowances: Pay scale: BPS For - 2023 Pay Scale Type: Civil BPS: 17 Pay Stage: 20

Wage type	Amount	Wage type	Amount
0001 Basic Pay	113,470.00	1210 Convey Allowance 2005	5,000.00
1897 Housing Subsidy Allowance	18,465.00	1947 Medical Allow 15% (16.22)	3,095.00
2148 15% Adhoc Relief All-2013	1,580.00	2199 Adhoc Relief Allow @10%	1,063.00
2315 Special Allowance 2021	6,074.00	2341 Disp. Rad All 15% 30/23KP	11,455.00
2347 Adhoc Rel At 15% 22/PS17)	11,455.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3017 GPF Subscription	-4,230.00	3501 Benevolent Fund	-1,500.00
3009 Income Tax	-8,029.00	4004 R. Benefit & Death Comp	-900.00
6174 CM Flood Relief Fund 17-22	-27,826.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	LIFE Loan Principal Instal	530,000.00	-20,000.00	440,000.00

Deductions - Income Tax

Payable: 94,787.88 Recovered till SEP-2023: 22,527.00 Exempted 0.00 Recoverable: 72,260.91

Gross Pay (Rs.): 171,657.00 Deductions (Rs.): -57,525.00 Net Pay (Rs.): 114,132.00

Payee Name: ZIA ULLAH KHAN

Account Number: 4004215092

Bank Details: NATIONAL BANK OF PAKISTAN, 330986 CIVIL SECRETARIAT CIVIL SECRETARIAT, PESHAWAR

Leaves: Opening Balance: Available: Earned: Unabsorbed

Permanent Address: BANNU

City: BANNU

Temp. Address:

City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Email: ziaullahwazir69@gmail.com

System generated document to be read in accordance with APPM 4.0 (2,987,155/27.09.2023/10.0)
All amounts are in Pak Rupees
Errors & omissions excepted (SERVICES/30.09.2023/14:55:41)

POWER OF ATTORNEY

In the Court of Peshawar High Court Peshawar
Zia ulah Khan

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of KPK and others

} Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/W, the undersigned, do hereby nominate and appoint

ZARAJ ANWAR & IMRAN KHAN ADVOCATES, my true and lawful attorney, for me in my same and on my behalf to appear at _____ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____

Im Khan
IMRAN KHAN
Advocate High Court
Mob: 0345-9090648

Zaraj Anwar
ZARAJ ANWAR
Advocate High Courts
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Mobile-0331-9399185
BC-10-9851
CNIC: 17301-1610454-5