

21.09.2022

Appellant present through counsel.

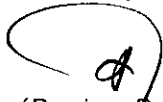
Kabir Ullah Khattak, Additional Advocate General
alongwith Muhammad Nazir Assistant for respondents No.2
& 3 present.

Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is
admitted for regular hearing subject to all legal objections.
Appellant is directed to deposit security and process fee
within 10 days. Where-after, notices be issued to
respondents No.1 & 4 for submission of reply/comments. To
come up for reply/comments of respondents No.1 & 4 on
17.11.2022 before S.B at Camp Court, Abbottabad.

Rs 100
Amount Deposited
Security & Process Fee

27/9


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

14.12.2021

Appellant in person present: Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Zahid Babar, ASI for respondents present.

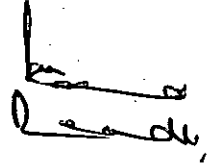
Written reply/comments not submitted. Learned district attorney seeks adjournment for a short date to submit the same. Appellant submitted an application for transfer the instant appeal to camp court Abbottabad. Application is allowed. To come up for written reply/comments on 16.02.2022 before S.B at camp court Abbottabad.



(MIAN MUHAMMAD)
MEMBER (E)

16-2-22:

Due to retirement of worthy chairman the Tribunal is non functional. To come up for the same on 20/7/22 at camp court Abbottabad.



20th July 2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Muhammad Nazir, Assistant, Office Assistant for the respondents present.

Written reply submitted on behalf of the respondents No. 2 and 3 which is placed on file. To come up for preliminary hearing on 21.09.2022 before S.B at camp court Abbottabad.



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

22.10.2021

Counsel for the appellant present. Preliminary arguments heard and case file perused.

Learned counsel for the appellant contended that the appellant was recruited constable for Special Police Force on contract basis vide office order dated 16.05.2014. Later on the services of contract constables were regularized w.e.f 01.03.2020 under Section-5 of the Khyber Pakhtunkhwa Special Police Officers (Regularization of Services) Act, 2019, vide notification dated 08.04.2020. Name of the appellant was ignored and not included for regularization in the said notification despite the fact that he had again been recruited on the recommendation of ETEA as Driver Constable (BS-07) on temporary basis w.e.f 08.11.2018. It was claimed that the appellant has been requesting for provision of copies of the relevant documents for the purpose of litigation but to no avail till date. His departmental appeal submitted on 06.01.2021 is available which seems to have been submitted after lapse of nine months of the issuance of said regularization notification. Where-after the instant service appeal has been submitted in Service Tribunal on 26.08.2021 which is also apparently time barred. No application for condonation is attached with memorandum of appeal to justify the delay. Let pre-admission notice be issued to the respondents for reply/comments. Adjourned. To come up for preliminary hearing before the S.B on 14.12.2021.


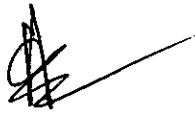

(MIAN MUHAMMAD)
MEMBER (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7348 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/08/2021	<p>The appeal of Syed Naeem Shah presented today by Mr. Abdul Shakoor Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar. Notices be issued to the appellants/counsel for preliminary hearing to be put up there on <u>22/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

CHECK LIST

1.	Case Title	Vs.....		
2.	Case is duly signed.		Yes	No
3.	The law under which the case is preferred has been mentioned.		Yes	No
4.	Approved file cover is used.		Yes	No
5.	Affidavit is duly attested and appended.		Yes	No
6.	Case and annexures are properly paged and numbered according to index.		Yes	No
7.	Copies of annexures are legible and attested. If not, then better copies duly attested have annexed.		Yes	No
8.	Certified copies of all requisite documents have been filed.		Yes	No
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.		Yes	No
10.	Case is within time.		Yes	No
11.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.		Yes	No
12.	Court fee in shape of stamp paper is affixed. [For writ Rs. 500, for other as required]		Yes	No
13.	Power of attorney is in proper form.		Yes	No
14.	Memo of addressed filed.		Yes	No
15.	List of books mentioned in the petition.		Yes	No
16.	The requisite number of spare copies attached [Writ petition-3, civil appeal (SB-2) Civil Revision (SB-1, DB-2)]		Yes	No
17.	Case (Revision/ Appeal/petition etc) is filed on a prescribed form.		Yes	No
18.	Power of attorney is attested by jail authority (for jail prisoner only)		Yes	No

It is certified that formalities/documentations as required in column 2 to 18 above, have been fulfilled.

Name:- _____

Signature:- _____

Dated:- _____

FOR OFFICE USE ONLY

Case:- _____

Case received on _____

Complete in all respect: Yes/ No, (If No, the grounds) _____

Date in court:- _____

Signature _____

(Reader)

Date:- _____

Countersigned:- _____

(Deputy Registrar)

**THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

BEP

Appeal No. 7348 /2021

Syed Naeem Shah Appellant


VERSUS

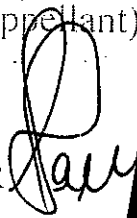
Government of Khyber Pakhtunkhwa and Others..... Respondents

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S. No.	Description of Page	Annexure	Page No.
1.	Memo of service Appeal		1-7
2.	Affidavit		8
3.	Correct address of the parties		9
4.	Copy of the appointment letter and advertisement published in Daily Mashriq	A	
5.	Copy of ETEA form and the passed service certificate	B	
6.	Copy of appointment order dated 08/11/2018	C	
7.	Copy of the notification dated 08/04/2020	D	
8.	Copy of Application to DPO	E	
9.	Copy of the order issued by respondent No. 2 along with better copy	F	
10.	Copies of service recorded in District Account Office, Mansehra of Waqar Hussain Shah Constable, Adil Shahzad Constable and appellant	G	
11.	Wakalat Nama	H	

Through


Syed Naeem Shah (Appellant)


ABDUL SHAKOOR
Advocate High Court,
Mansehra

(1)

**BEFORE THE KHYBER PUKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. _____ 2021

Syed Naeem Shah son of Chan Pir Shah resident
of Phagla, Post Office Attar Shisha presently Dak
Bangla, Mohallah Sainabad, District Mansehra
.....Appellant

VERSUS

1. Government of Khyber Pukhtunkhwa
through Secretary H & T.A's Department,
KPK Peshawar.
2. Inspector General of Police, Peshawar
3. District Police Officer, Mansehra.
4. District Account Officer, Mansehra.

.....Respondents.

**APPEAL UNDER SECTION 4 OF
KHYBER PUKHTUNKHWA SERVICE
TRIBUNAL ACT 1974 AGAINST THE
ORDER OF INSPECTOR GENERAL
OF POLICE, KPK PESHAWAR ISSUED
VIDE OFFICE LETTER NO. 2921/E-IV
DATED 05.03.2021 WHEREBY THE
APPLICATION FOR INCLUDING THE
PAST SERVICE OF THE PETITIONER
RENDERED IN SPECIAL POLICE
FORCE WAS NOT CONSIDERED**

2

THAT IS ILLEGAL, VOID WITHOUT
LAWFUL AUTHORITY, WITHOUT
JURISDICTION AND SAME IS NOT
TENABLE IN THE EYES OF LAW AND
IS LIABLE TO BE SET ASIDE.

Prayer:-

On acceptance of instant appeal the order of respondent No.2 may kindly be set aside and the respondent may be direction to include the past service of appellant rendered in special police force in order to meet the ends of justice.

Respectfully Sheweth:-

Facts:-

1. That the Appellant was serving in Special police force, District Mansehra since 16.05.2014 to 07.11.2018 as driver when applications were invited by the Police department, KPK for drivers / constables through ETEA.

(Copies of the appointment letter, advertisement published in Daily Mashriq and Application are annexed as annexure "A")

2. That the appellant properly applied for the post of Driver and did

mention in the ETEA form that previously the petitioner was serving in Special police force, Mansehra and to this effect he also produced a certificate from DPO, Mansehra in support of the fact that he remains in service in Special police force, Mansehra w.e.f 16.05.2014.

(Copy of ETEA form and the passed service certificate are annexed as annexure "B").

3. That the some of other employees working with the petitioner in Special Police Force, Mansehra also applied for regular job in regular police force and were recruited alongwith the petitioner. The appointment order of the petitioner was issued from the office of DPO, Mansehra vide endorsement No. 16806-10 dated 08.11.2018 whereby the appellant was appointed as Driver constable in BPS-7 w.e.f 08.11.2018.

(Copy of appointment order dated 08.11.2018 is annexed as annexure "D").

4. That thereafter through notification issued by home and tribal Affairs

④

department, Peshawar dated
08.04.2020 bearing No. So
(Budged)/HD/15-29/2016 VOL-II
the special police officers working in
District Mansehra were regularized
w.e.f 01.03.2020.

*(Copy of the notification dated
08.04.2020 is annexed as annexure
"E").*

5. That the past service of the appellant was neither counted nor regularized which amounted to discrimination on the part of respondents as others have already been regularized.
6. That an application was moved to respondent No.2 for inclusion of the past service rendered by the appellant as has been done in the case of others Special Police force members who were regularized on 01.03.2020.

*(Copy of application is annexed as
annexure "F").*

7. That the application of the petitioner was not considered by the respondents No.2 through its letter

5

No. 2921 dated 05.03.2021 by mentioning that "SPO period of contract service purity temporally basis which cannot be considered.

(Copy of the order issued by respondent No.2 is annexed as annexure "G").

8. That similar placed persons Waqar Hussain Shah Constable and Adil Shahzad Constable who remained colleagues of the petitioner, their service record in District Account Office, Mansehra depicts their length of service as 7 year and 2 month while the service record of the appellant contains the length of service as 2 years 8 months and 25 days which is glaring discrimination of the part of respondents and needs to be rectified.

(Copies of service recorded in District Account Office, Mansehra of Waqar Hussain Shah Constable, Adil Shahzad Constable and appellant are annexed as annexure "H").

9. That respondent No.3 did not consider the application which had been given him vide dated

(6)

06.01.2021 by the appellant placed on record.

10. The denial of counting of service of appellant by the respondent from 16.05.2014 and its regularization is impugned inter alia on the following grounds:-

-:GROUNDS:-

- a) That denial of counting of past service of appellant by the respondent from 16.05.2014 and its regularization is illegal void based on discrimination needs to be rectified.
- b) That the valuable right of the appellant involve in the matter.
- c) That the order of denial of counting past service of appellant by respondents is against the facts, law and circumstances of the case hence not tenable.
- d) That the appeal of the Petitioner is competent and this Honorable tribunal has got jurisdiction in the matter.

7

- e) That further points will be submitted at the time of arguments.

.....PRAYER.....

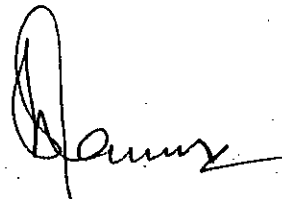
It is, therefore, most humbly prayed that on acceptance of instant appeal the order of respondent No.2 may kindly be set aside and the respondents may be directed to include the past service of appellant rendered in special police force in order to meet the ends of justice.

Dated 26.08.2021



Syed Naeem Shah
.....Appellant

Through:-



ABDUL SHAKOOR,
Advocate High Court,
Mansehra.

8

**BEFORE THE KHYBER PUKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. _____ 2021

Syed Naeem ShahAppellant

VERSUS

Government of Khyber Pukhtunkhwa and
others.....Respondents

SERVICE APPEAL

AFFIDAVIT

Syed Naeem Shah son of Chan Pir Shah
resident of Phagla, Post Office Attar
Shisha presently Dak Bangla, Mohallah
Sainabad, District Mansehra, do hereby
solemnly affirm and declare on oath that
the contents of foregoing appeal are true
and correct to the best of my knowledge
and belief and nothing has been
concealed therein. No such appeal is
pending in any other court.

Dated 26.08.2021

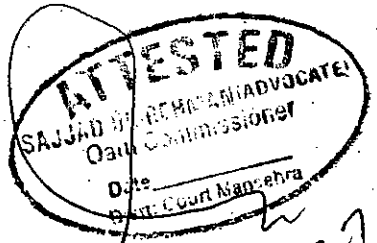
Ny

SYED NAEEM SHAH
Deponent

Identify by

Amir

ABDUL SHAKOOR,
Advocate High Court,
Mansehra.



27/8/2021

(4)

**BEFORE THE KHYBER PUKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. _____ 2021

Syed Naeem ShahAppellant

VERSUS

Government of Khyber Pukhtunkhwa and
others.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES


APPELLANT

Syed Naeem Shah son of Chan Pir Shah resident
of Phagla, Post Office Attar Shisha presently Dak
Bangla, Mohallah Sainabad, District Mansehra

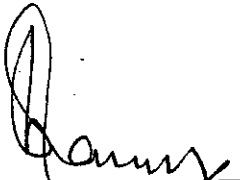
RESPONDENTS

1. Government of Khyber Pukhtunkhwa through
Secretary H & T.A's Department, KPK
Peshawar.
2. Inspector General of Police, Peshawar
3. District Police Officer, Mansehra.
4. District Account Officer, Mansehra.

Dated 26.08.2021


Syed Naeem Shah
.....Appellant

Through:


ABDUL SHAKOOR
Advocate High court,
Mansehra.



DISTRICT MANSEHRA

POLICE DEPARTMENT

ORDER

As approved by the recruitment committee under the chairmanship of Mr. Akhtar Hayat Khan, Regional Police Officer Hazara Region Abbottabad, and consisting of Dr. Khurram Rashid, District Police Officer Manselhra, and Mr. Muhammad Ijaz, District Police Officer Haripur, the following candidates have selected for Special Police Force on Contract Basic against one hundred (100) vacant posts of Manselhra District by the said committee are appointed in Fix Pay (Rs. 15000/-) with effect from 16.05.2014. Their appointments are purely on temporary basis up to 31.12.2015.

They are allotted constabulary Nos as noted against each their names.

Table with 7 columns: S No., Name, Parentage, Address/village, Police Station, Appointed as, Allotted SPF Nos. It lists 48 candidates with their respective details.

Inspector Manselhra

OB 16-5-14
94

Copy to the:-
 > Regional Police Officer Hazara Region Abbottabad for favour of information, please
 > District Accounts Officer, Manselira
 > Pay Officer DPO Office Manselira
 > SRC/OHC DPO Office Manselira.

No 6905-10 / OHC dated Manselira the 16-05-2014

Manselira
 Manselira
 Manselira

District Police Office Manselira

50	Constable	Lassan	Aurangzeb	Muhammad Shohab
51	Constable	Lassan	Malik Dildar	Israr Ahmed
52	Constable	City	Collge Dhoraha	Arif Dildar
53	Constable	Baffa	Toolkey Chitru Gati	Junaid Ahmed
54	Constable	City	Sarwar Channal	Muhammad Nasir Afridi
55	Constable	City	Jalal Abad	Muhammad Nisar
56	Constable	City	Moh: Mufti Abad	Jalal Ahmed
57	Constable	Shinkari	Banda Khawajgan Jabot	Rizwan Ahmed
58	Constable	Saddar	Narbeer	Israr Ahmed
59	Constable	Shinkari	Bedadi	Muhammad Aftit
60	Constable	Shinkari	Bedadi	Muhammad Zahoor
61	Constable	Shinkari	Bedadi	Noor Muhammad
62	Constable	Shinkari	Khaki	Muhammad Farid
63	Constable	City	Bedadi	Sardar Muhammad
64	Constable	Garhi	King Abdulah Hospital	Muhammad Farid
65	Constable	Lassan	Banda Balola	Muhammad Khushal
66	Constable	Saddar	Behali	Muhammad Shihazad
67	Constable	Baffa	Gandian	Uzair Shihazad
68	Constable	Phutra	Kachoo	Waqar Hussain Shah
69	Constable	Balakot	Gandian	Muhammad Adil
70	Constable	Saddar	Kachoo	Gul Faraz
71	Constable	Phutra	Kachoo	Akram Shihazad
72	Constable	Garhi	Kachoo	Waqas Ahmed
73	Constable	Phutra	Kachoo	Muhammad Nisar
74	Constable	Phutra	Kachoo	Muhammad Nisar
75	Constable	Shinkari	Kachoo	Muhammad Nisar
76	Constable	Shinkari	Kachoo	Muhammad Nisar
77	Constable	Shinkari	Kachoo	Muhammad Nisar
78	Constable	Shinkari	Kachoo	Muhammad Nisar
79	Constable	Shinkari	Kachoo	Muhammad Nisar
80	Constable	Shinkari	Kachoo	Muhammad Nisar
81	Constable	Shinkari	Kachoo	Muhammad Nisar
82	Constable	Shinkari	Kachoo	Muhammad Nisar
83	Constable	Shinkari	Kachoo	Muhammad Nisar
84	Constable	Shinkari	Kachoo	Muhammad Nisar
85	Constable	Shinkari	Kachoo	Muhammad Nisar
86	Constable	Shinkari	Kachoo	Muhammad Nisar
87	Constable	Shinkari	Kachoo	Muhammad Nisar
88	Constable	Shinkari	Kachoo	Muhammad Nisar
89	Constable	Shinkari	Kachoo	Muhammad Nisar
90	Constable	Shinkari	Kachoo	Muhammad Nisar
91	Constable	Shinkari	Kachoo	Muhammad Nisar
92	Constable	Shinkari	Kachoo	Muhammad Nisar
93	Constable	Shinkari	Kachoo	Muhammad Nisar
94	Constable	Shinkari	Kachoo	Muhammad Nisar
95	Constable	Shinkari	Kachoo	Muhammad Nisar
96	Constable	Shinkari	Kachoo	Muhammad Nisar
97	Constable	Shinkari	Kachoo	Muhammad Nisar
98	Constable	Shinkari	Kachoo	Muhammad Nisar
99	Constable	Shinkari	Kachoo	Muhammad Nisar
100	Constable	Shinkari	Kachoo	Muhammad Nisar

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اشتہار برائے بھرتی ڈرامہ بورڈ کا سٹیبلان خیبر پختونخوا پولیس

محکمہ پولیس خیبر پختونخوا کو برائے بھرتی ڈرامہ بورڈ کا سٹیبلان بذریعہ خیبر پختونخوا ایجوکیشنل سٹیبلنگ ایڈوائزمنٹ ایجنسی (ETEА) درخواستیں مطلوب ہیں۔ خواہشمند موزوں مرد امیدواران جو درج ذیل شرائط پر پورا اترتے ہو، کو بذریعہ اشتہار مطلع کیا جاتا ہے کہ

(a) اپنی درخواستیں مع دستاویزات (قومی شناختی کارڈ، موزوں LTV ڈرائیونگ لائسنس، تعلیمی اسٹاڈیو وغیرہ) نیچے دیے گئے طریقہ کار کے مطابق ایسا (ETEА) پتہ اور کے پتے پر ارسال کریں۔ (b) نامکمل اور مقررہ تاریخ کے بعد موصول ہونے والی درخواستیں زیر غور نہیں لائی جائے گی۔

شرائط بھرتی: (1) تعلیم: میٹرک پاس (2) عمر: 21 تا 30 سال (3) موزوں LTV لائسنس (4) قد: 5 فٹ 7 انچ (5) چھاتی: 34.5x33 (6) ڈوبیاں: صرف خیبر پختونخوا کے متعلقہ اضلاع (7) جسمانی ٹیسٹ: 08 منٹ میں ایک میل دوڑ پاس کرنا لازمی ہے۔ (8) جسمانی امتحانات مندرجہ ذیل شہروں میں ہونگے۔ (i) پشاور (ii) بنوں (iii) ایبٹ آباد (iv) سوات۔ (نوٹ: سینئر کی تبدیلی کیلئے کوئی درخواست زیر غور نہیں لائی جائے گی۔) (9) تحریری ٹیسٹ: جسمانی ٹیسٹ میں کامیاب امیدواروں (جن امیدواروں نے جسمانی پیمائش اور دوڑ کو ایضاً کیا ہو) کو تحریری امتحان کیلئے مقررہ اضلاع میں پیش ہونا ہوگا۔ (تفصیلات ویب سائٹ پر موجود ہوں گی نیز کامیاب امیدواروں کو بذریعہ SMS بھی اطلاع دی جائے گی۔) (10) پریکٹیکل ڈرائیونگ ٹیسٹ: تحریری ٹیسٹ میں کامیاب امیدواروں کا پریکٹیکل ڈرائیونگ ٹیسٹ پشاور میں لیا جائیگا۔ (11) اضافی نمبر: تمام طرز کے مندرجہ بالا امتحانات میں کامیاب امیدواروں کا میرٹ بناتے وقت اضافی نمبرات مندرجہ ذیل فارمولے کے مطابق دیئے جائیں گے (الف) انٹرمیڈیٹ یا اعلیٰ تعلیم: 02 نمبر (ب) ڈیپلیمانٹ یا ڈیپلوما: 02 نمبر (ج) موزوں HTV ڈرائیونگ لائسنس: 02 نمبر (نوٹ: اضافی نمبر 06 سے زیادہ نہیں ہونگے۔)

(12) مسلسل 03 سال تک محکمہ پولیس میں مستقل بنیاد پر بطور کلاس فوراً نائب قائد کو کرسی کرنے والے اور مسلسل 03 سال تک صاف ستھری نوکری کرنے والے ایسٹنٹ پولیس فورس کے جوان جو طلبہ تعلیمی اور جسمانی معیار پر پورا اترتے ہو، کو میرٹ بناتے وقت 03 اضافی نمبر دیئے جائیں گے۔ متعلقہ ڈی آئی پی او سے سرٹیفکیٹ لینا لازمی ہوگا۔
نوٹ: (1) حکومتی پالیسی کے مطابق عمر، قدر، چھاتی اور تعلیم میں کوئی رعایت نہیں دی جائے گی لہذا متعلقہ معیار پر پورا اترنے والے امیدواروں کی درخواستیں منظور نہیں کی جائے گی۔ (2) خیبر پختونخوا کے اضلاع سوات، بونیر، شانگلہ، درہلوز، درہیر، چترال، کوستان اور توغرخ کے امیدواروں کو گورنمنٹ کی طرف سے دی گئی (03) سال زائد عمر میں رعایت دی جائے گی۔ (3) فٹافٹ نمبر ریجن اور ملائند ایجنسی ڈوبیاں کے حامل افراد درخواست دینے کے قابل نہیں ہونگے۔

درخواست دینے کا طریقہ کار:

خواہشمند امیدواران اپنی درخواستیں مورخہ 11 اگست 2017 سے آن لائن درج ذیل ویب سائٹ پر جمع کرائیں۔ (درخواست میں دیئے گئے کوآڈف کے درست نہ ہونے کی تمام تر ذمہ داری درخواست دہندہ پر ہوگی۔) (www.etea.edu.pk) درخواست گزار جمع شدہ آن لائن درخواست کا پرنٹ آؤٹ جس پر کپیڈ ٹوٹن نمبر موجود ہو، صبح 650 روپے (استحالی نمبر 2 تا قابل واپس) HBL کے کسی بھی برانچ میں مجوزہ ڈیپازٹ سلیپ پر ایٹاک کا ڈیوٹ میں جمع کرا دیں اور مکمل کئے گئے درخواست فارم مع اصل ڈیپازٹ سلیپ (ETEА Copy)، 2 عددی رنگین تصاویر (پاسپورٹ سائز) کپیڈ ڈرائیونگ قومی شناختی کارڈ، LTV لائسنس، میٹرک سرٹیفکیٹ و DMIC اور دیگر مطلوبہ تعلیمی اسناد کی تصدیق شدہ فوٹو کاپیاں بذریعہ ڈاک اور سرسروں نیچے دیئے گئے پتے پر مورخہ 01 ستمبر 2017 تک ارسال کریں۔ امیدواروں کو جسمانی تحریری ٹیسٹ کیلئے ایٹاک کے ذریعے اطلاع دی جائے گی نیز یہ معلومات ایٹاک ویب سائٹ پر بھی دی جائے گی۔ جسمانی پیمائش اور دوڑ کی تاریخ اور ٹیسٹ سنٹرل رول نمبر سلیپ میں درج ہوگا۔

نوٹ: آن لائن درخواست جمع کرنے کے لئے درخواست گزار اپنے تعلیمی اور دیگر کوآڈف اور Recent Scanned Passport Size Picture (پاسپورٹ سائز) کی تصویر کی سائٹ کاپی (نمبر دراپے ساتھ رکھیں۔ درخواست فارم میں متعلقہ جگہ پر اپنے انگوٹھے کا نشان لازمی دکھائیں بھرتی دیکر فارم قابل قبول نہیں ہوگا۔ نیاز اتھارٹی ہر مرحلے کی نشان انگشت کی تصدیق کئے جائیں گے۔ استحالی نمبر کے ذریعے کسٹم کیا جائے گا۔ تمام طرز کے مندرجہ بالا امتحانات میں کامیاب امیدواروں کو فائنل پریکٹیکل ڈرائیونگ ٹیسٹ اور کوالٹی چیک (جسمانی) کے لئے پشاور لازمی آنا ہوگا۔ نشان انگشت کی تصدیق ٹیل ہونے کی صورت میں آپ کسی بھی مرحلے پر نااہل قرار دیئے جائیں گے۔ استحالی مرکز میں موبائل فون لانے کی اجازت نہیں ہے۔ جسمانی تحریری اور ہر طرح کے امتحان کی تاریخوں کے بارے میں ETEА کے ذریعے اطلاع دی جائے گی۔ جعلی دستاویزات کی صورت میں تحریری کارروائی کے علاوہ محکمہ پولیس میں کسی بھی نوکری کے لئے داخل کیا جائے گا۔

درخواستیں جمع کرانے کی آخری تاریخ 01 ستمبر 2017 ہے جبکہ درخواستیں متعلقہ طریقہ کار کے مطابق نیچے دیئے گئے پتے پر ارسال کریں اور لفافے پر واضح طور پر اسمائی کا نام اور ایڈریس لکھیں۔

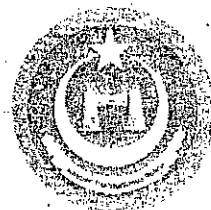
ڈی سی پراجیکٹ ایٹا۔ پلاٹ نمبر 22، جلی نمبر 13، سیکٹر E8، فیز 7 (نزدیج کپلیکس) حیات آباد پشاور
(D.C. PROJECT ETEA, PLOT-22, Street-13 Sector E8, PHase-VII, Near Hall Complex, Hayatabad, Peshawar)
مزید معلومات کیلئے www.etea.edu.pk فون نمبر 091-9217846-896

خیبر ایڈمنسٹریشن۔ خیبر پختونخوا ایجوکیشنل سٹیبلنگ ایڈوائزمنٹ ایجنسی (ETEА)۔ پشاور
مخائبہ اے آئی سی اسٹیبلشمنٹ۔ خیبر پختونخوا پولیس۔ پشاور

INF(P)3887



ETEA



KHYBER PAKHTUNKHWA EDUCATIONAL TESTING &
EVALUATION AGENCY

APPLICATION FORM FOR THE POST OF POLICE DRIVER IN THE KHYBER PAKHTUNKHWA POLICE DEPARTMENT 2017

1. Have You Served In Special Police Force For Minimum 3 Years. (if yes, then attach Certificate issued by the Concerned DPO) Yes
2. Are you police employee's Son? Yes

TOKEN NO. Police-03912 DISTRICT OF DOMICILE: Mansehra

NAME : Syed Naheem Shah
FATHER / HUSBAND NAME : Syed Chan Pir Shah
APPLICANT CNIC NUMBER : 1350380886667
DATE OF BIRTH : 1-March-1990
MOBILE NUMBER : 03469599247
ALTERNATE MOBILE NUMBER : 03459610561
RELIGION : muslim
GENDER : male
MARITAL STATUS : unmarried
POSTAL ADDRESS : House of Chan Pir Shah Mohalla Sainabad Dakbangla
Mansehra
PERMANENT ADDRESS : Village Phaglia Post Office Attershisha Mansehra
LICENCE NUMBER : 23218
LICENCE ISSUE DATE : 7-February-2012
LICENCE EXPIRY DATE : 8-January-2017



Attach Your Latest Picture
Here

EDUCATION DETAILS:

DEGREE	PASSING YEAR	OBTAINED MARKS	TOTAL MARKS	BOARD
Matric / SSC	2013	474	1050	BISE Abbottabad

HIGHEST EDUCATION : Matric

UNDERTAKING BY THE CANDIDATE:

I (Syed Naheem Shah s/d/w Of Syed Chan Pir Shah) Do Hereby Solemnly Declare That I Have Read All The Instructions For Appearing In The Test And That I Have Filled The Form. I Further Affirm That The Information Given In The Form Are True And Correct To The Best Of My Knowledge And Belief And I Understand That If Any Information Is Found Wrong/untrue,Disciplinary Action Will Follow Which May Result In Cancellation Of My Test

Signature Of The Applicant :

Signature Of The Applicant :

DATE: 15-08-2017

Signature

NOTE:

Please take a print out of the Application form and Deposit Rs. 650/- on prescribed online deposit slip given below in any Branch of HBL and Application form along with attested copies of the following documents should be sent through courier/postal means to the address given below on or before **1st September 2017**.

نوٹ:

برائے مہربانی درخواست فارم کو پرنٹ کریں اور مبلغ -/650 روپے امتحانی فیس نیچے دیے گئے ڈیپازٹ سلیپ پر HBL کے کسی بھی براچ میں جمع کرائیں اور درخواست فارم بحق مندرجہ ذیل اسناد کی تصدیق شدہ کاپیاں بذریعہ ڈاک اکوڑ پیکر سروس نیچے دیے گئے پتے پر مورخہ 01 ستمبر 2017 تک ارسال کریں۔

(مندرجہ ذیل اسناد کی تصدیق شدہ نقل منسلک کریں بصورت دیگر فارم قابل قبول نہیں ہوگا)

- 1) Original Deposit slip (ETEA copy)
- 2) Copy of CNIC
- 3) Domicile Certificate
- 4) Matric Certificate
- 5) Matric DMC
- 6) Other education documents (if applicable)

- (1) اصلی ڈیپازٹ سلیپ (ایٹیا کاپی)
- (2) کپیڈ اور قومی شناختی کارڈ کی کاپی
- (3) اوساگ سرٹیفکیٹ
- (4) میٹرک سرٹیفکیٹ
- (5) میٹرک DMC
- (6) دیگر تعلیمی اسناد (اگر قابل ہوں تو)

Address:

ETEA, PLOT-22, STREET-13, SECTOR E8, PHASE-VII (NEAR HAJJ COMPLEX), HAYATABAD,
PESHAWAR

پتہ:

ایٹیا پلاٹ نمبر 22، گلی نمبر 13، سیکٹر ای 8، فیز 7 (نزد حج کمپلیکس)، حیات آباد، پشاور

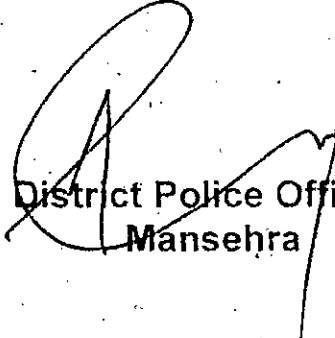


POLICE DEPARTMENT

DISTRICT MANSEHRA

CERTIFICATE

Certified that Constable Naheem Shah No. 91 serving as
Driver Constable in Special Police Force district Mansehra with effect
from 16.05.2014 to date.


District Police Officer
Mansehra



POLICE DEPARTMENT

MANSEHRA DISTRICT

O R D E R

As recommended by the recruitment committee of Educational Testing & Evaluation Agency Khyber Pakhtunkhwa (ETEA) the following candidates who have qualified /selected by the said committee and after fulfilling other formalities are hereby appointed as Driver Constable against the available vacant posts of Driver Constable in BPS-7 (10990-610-29290) with effect from ~~08-11-2018~~ /2018. Their appointments are purely on temporary basis and are liable to be terminated at any time without assigning any reason within 14 days.

S No.	Name of Candidate	Father Name	Date of Birth	Height	Chest	Address	Allotted No.
1.	Syed Naheem Shah	Syed Chan Pir Shah	01.03.1990	5-9 ½	37½ x39	Village Phagla Tehsil & District Mansehra	260
2.	Ghulam Mustafa	Abdur Rehman	09.04.1988	5-9	33x34½	Village Domna Chatter Plain Tehsil & District Mansehra	846
3.	Afzaal Ahmad	Ali Asghar	02.02.1990	5-9	37x39	Village Seri Arbora Tehsil Oghi District Mansehra	765
4.	Shabbir	Habib ur Rehman	12.07.1989	5-10	35x37	Village Tanda near Jamia Masjid Farooqia Tehsil & District Mansehra	579

OB-175
08-11-18


District Police Officer,
Mansehra

No. 16806-10 /OHC, dated Mansehra the 08-11 /2018.

Copy of above is submitted to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for favour of information with reference to CPO Peshawar memo: No. 6129-59/E-IV, dated 09.08.2018, please.
2. Regional Police Officer, Hazara Region Office Abbottabad for favour of information with reference to Region Office Abbottabad Endst: No. 21847-54/EC, dated 29.08.2018, please.
3. District Accounts Officer, Mansehra.
4. Pay Officer DPO Office Mansehra.
5. SRC DPO Office Mansehra.



Government of Khyber Pakhtunkhwa
Home & Tribal Affairs Department
Dated Peshawar the April 8th, 2020

Office of the Superintendent
No. 1891
Date 22/4/20

NOTIFICATION

No.80(Budget/III)/15-29/2016 Vol-II: In pursuance of the provisions contained in Section 3 read with Section 5 of the Khyber Pakhtunkhwa Special Police Officers (Regularization of Services) Act, 2019 (Khyber Pakhtunkhwa Act No.XXVII of 2019) and on the recommendation of Provincial Police Officer, Khyber Pakhtunkhwa and approval of the Provincial Cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regularization of the following Special Police Officers (SPOs) working in District Manshehra under DDO Code MA4027- Law & Order Manshehra as Constables (BPS-07) with effect from 01-03-2020:

S.No	Name	Father Name	Belt No.
1	Babar Khan	Muhammad Shafique	1
2	Amir Khan	Farboz Khan	2
3	Babar Ali	Ghulam Khan	3
4	Naeem Iqbal	Muhammad Iqbal	4
5	Muhammad Tahir	Muhammad Ejaz	5
6	Yasir Shah	Syed Mazhar Hussain Shah	6
7	Syed Bilal Shah	Syed Makhdoom Hussain Shah	7
8	Faheem	Abdul Razzaq	8
9	Umar Tariq	Muhammad Tariq	9
10	Muhammad Sajid	Wali ur Rehman	10
11	Muhammad Junaid	Muhammad Javed	11
12	Bilal Bashir	Muhammad Bashir	12
13	Shabaz Ahmad	Muhammad Farooq	13
14	Gul Fraz	Riaz Muhammad	14
15	Arsalan Ahmad	Muhammad Yousaf Khan	15
16	Salma Sallar	w/o Shoaib Akhtar	16
17	Naheem Khan	Muhammad Javed	17
18	Abdul Shaheed	Khasta Khan	18
19	Muhammad Ejaz Zeb	Aurang Zeb	19
20	Muhammad Javed	Muhammad Hussain	20
21	Muhammad Usman	Muhammad Farooq	21
22	Musadiq Shaluzad	Syed Liaqat Ali Shah	22
23	Qamar Manzoor	Manzoor	23
24	Tehseen Ahmad	Qazi Muhammad Shafi Khokar	24
25	Nadir Haroo	Muhammad Haroon	25
26	Muhammad Bilal	Muhammad Faridoon	26
27	Shoaib	Shamriaz Akhtar	27
28	Muhammad Akram	Muhammad Nawaz	28
29	Muhammad Tahir	Ghulam Mustafa	29
30	Manzoor Shah	Syed Manzoor Hussain Shah	30
31	Manzoor Hussain	Saidur Rehman	31
32	Aman	Muhammad Altaf	32
33	Sajjad Ahmad	Aurang Zeb	33
34	Shoaib Ahmad	Awal Khan	34
35	Nasir Hussain Shah	Syed Mazhar Hussain Shah	35
36	Ishfaq	Arbab	36
37	Muhammad Ejaz	Muhammad Maroof	37

af

Attested
Inspector
Lawal Manshehra

38	Muhammad Arshad	Muhammad Noor	38
39	Syed Ali Shah	Syed Wakeel Shah	39
40	Ghulam Mustafa	Ashiq Hussain	40
41	Saqib Nawaz	Haq Nawaz	41
42	Ehsan Khan	Muhammad Sheeraz Khan	42
43	Muhammad Saqib	Ali Mardan Khan	43
44	Haider Ali	Muhammad Rafique	44
45	Wajid	Abdul Qayoom	45
46	Jawad	Nawaz Ahmad	46
47	Zahid	Shad Muhammad	47
48	Mubashir Noshad	Noshad Khan	48
49	Faizan Fida	Fida Hussain	49
50	Rashid	Muhammad Hussain	50
51	Israr Ahmad	Malik Dildar	51
52	Arif Dilbar	Dilbar Khan	52
53	Junaid Ahmad	Manzoor Ahmad	53
54	Fazal Rabi	Muhammad Toufeeq Khan	54
55	Abdur Rehman	Faqeer Muhammad	55
56	Fahian Khan	Muhammad Khial	56
57	Aurangzeb	Mawali	57
58	Muhammad Atif	Muhammad Zahoor	58
59	Fiaz	Noor Muhammad	59
60	Shoukat	Fazal ur Rehman	60
61	Waqar Hussain Shah	Altaf Hussain Shah	61
62	Uzair Shahzad	Muhammad Shezad	62
63	Muhammad Adil	Muhammad Khushal	63
64	Gul Faraz	Sardar Muhammad	64
65	Akram Shahzad	Muhammad Faraed	65
66	Muhammad Haroon	Ali Zaman	66
67	Muhammad Nisar	Kachoo	67
68	Muhammad Khurshid	Behram Khan	68
69	Abdul Hakeem	Abdul Bahas	69
70	Muhammad Waheed	Ghulam Sarwar	70
71	Ahsan Rasheed	Abdul Rasheed	71
72	Faizan Khan	Mushtaq Ahmad	72
73	Sabir Hussain	Muhammad Faraed	73
74	Muhammad Fiaz	Khalil ur Rehman	74
75	Khurram Shahzad	Ali Akbar	75
76	Razaqat	Gul Zaman	76
77	Muhammad Adil	Taj Muhammad	77
78	Hamid Hussain	Muhammad Hussain	78
79	Muhammad Jehangir	Muhammad Arif	79
80	Muhammad Adil	Muhammad Zaiman	80
81	Fazal ur Rehman	Muhammad Ameen	81
82	Sheriyar Khan	Faiz Muhammad	82
83	Shahid Khan	Shamroz Khan	83
84	Habib Ullah	Samlullah	84
85	Fazal Ameen	Shah Jehan	85
86	Zakir	Khasta Khan	86
87	Tayub	Ghulam Mustafa	87
88	Amir Shahzad	Muhammad Suleman	88
89	Adil Shahzad	Jamil ur Rahman	89
90	Juma Khan	Shamsul Yameen	90
91	Awais Ahmed	Muhammad Idrees	91
92	Muhammad Khurshid	Abdul Rasheed	92
93	Sher Afzal	Malik ur Rehman	93

94	Waqar
95	Muham
96	Naheer
97	Ali Zee
98	Numa
99	Faisa
100	Asa

st No 8
 py for
 1.
 2.
 3.

Inspector
Local Mansab

94	Waqar Ahmad	Muhammad Yousof	94
95	Muhammad Abid	Shah Rehman	95
96	Naheem Akram	Shams ul Haq	96
97	Ali Zeeshan	Muhammad Saleem	97
98	Numan	Waheed	98
99	Faisal Shahzad	Aurang Zeb	99
100	Asad	Liaqat Ali	100

Secretary to Govt. of Khyber Pakhtunkhwa
Home & Tribal Affairs, Department

Endst No & date even

Copy forwarded for information to:

1. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. ✓ The Provincial Police Officer, Khyber Pakhtunkhwa.
4. The Regional Police Officer, Abbottabad.
5. The District Police Officer, Mansehra.
6. The District Accounts Officer, Mansehra.
7. PS to Home Secretary, Khyber Pakhtunkhwa.

[Signature]
SECTION OFFICER (BUDGET)

[Signature]
Inspector
Mansehra

Scanned with CamScanner

جناب عالی!

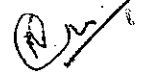
درخواست برائے شامل کرنے سروس SPF

از مورخہ 16.05.2014 تا 07.11.2018 (عرصہ ساڑھے چار سال)

- 1- یہ کہ سائل مورخہ 16.05.2014 کو بطور ڈرائیور کا نیشنل نمبر 91 SPF میں بھرتی ہوا آرڈر کا پی لف ہے
- 2- یہ کہ سائل Eata کے ذریعہ بطور ڈرائیور محکمہ کی اجازت سے SPF کے سرٹیفکیٹ کے ساتھ درخواست بھجوائی۔ جس پر سائل تمام امتحانات پاس کر کے Eata میں پہلی پوزیشن حاصل کی میرٹ لسٹ کی کا پی لف ہے سائل باضابطہ طور پر SPF سے Eata کو ایفائیڈ ہونے کے بعد ریگولر پولیس میں ضم ہوا اور مورخہ 08.11.2018 کو ریگولر آرڈر ہوا کا پی آر لف ہے اور پرسنل نمبر 00717532 بھی SPF کا ہے Eata میرٹ لسٹ بناتے وقت سائل کی SPF کی سروس کے 3 نمبر شامل کئے گئے
- سیلری سلیپ کی کا پی ہمراہ لف ہیں
- 3- یہ کہ سائل نے باقاعدہ محکمہ سے اجازت کے ساتھ Eata کو ایفائیڈ کیا۔
- 4- یہ کہ سائل کے دیگر ساتھی اسپیشل پولیس فورس کے 100 کے لگ بھگ بطور کانسٹیبلان خیبر پختون خواہ حکومت کے حکم پر مارچ 2020 سے ریگولر پولیس میں ضم ہو چکے ہیں ان کی سروس 16.05.2014 سے کاؤنٹ کی گئی ہے اسی طرح سائل نے محکمہ کی اجازت سے Eata کو ایفائیڈ کرنے کے بعد ریگولر پولیس میں ضم ہوا سائل کا جملہ ریکارڈ چیک کیا جاسکتا ہے۔
- 5- بذریعہ درخواست استدعا ہے کہ مندرجہ بالا گزارشات پر غور کرتے ہوئے اسپیشل پولیس فورس کی سروس ریگولر میں شامل کرنے کے احکامات جاری فرمائیں جاویں۔

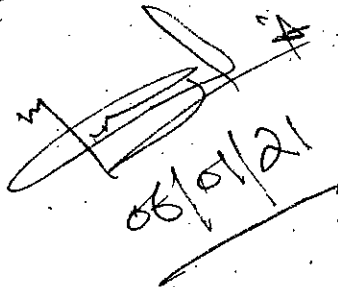
ارض

کانٹریبل ڈرائیور سید نعیم شاہ نمبر 260 متعینہ ASP/HQ مانسہرہ



المرقوم 06.01.2021

Sir,
Forwarded for
favourable Consideration please


06/01/21

"BETTER COPY"

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
CENTRAL POLICE OFFICE,
KHYBER PAKHTUNKHWA,
PESHAWAR

No. 2921/E-IV dated Peshawar, 05/ 03 /2021

To

The District Police Officer,
Mansehra.

Subject: APPLICATION

Memo:

Reference application submitted by Driver Constable Chan Peer Shah of District Police Mansehra (copy enclosed).

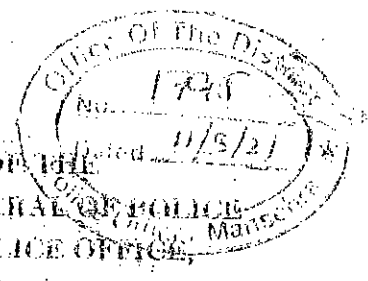
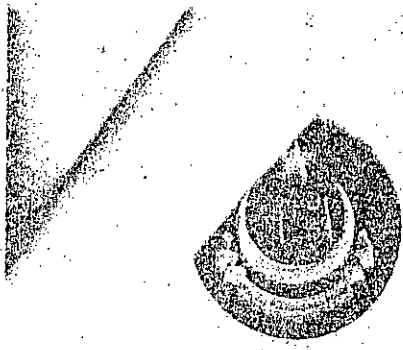
As opined by AIG/Legal CPO Peshawar that "SPO period was a contrat service purely temporary basis, which cannot be considered.

Applicant may please be informed accordingly.

SRC/For N/A

APD/Mansehra
11/3

SD/-
(SYED ANIS-UL-HASSAN)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
CENTRAL POLICE OFFICE,
KHYBER PAKHTUNKHWA,
PESHAWAR.

No. 8921 /E-IV dated Peshawar, 05/03/2021

To: The District Police Officer,
Mansehra.

Subject: APPLICATION

Memo:

Reference application submitted by Driver Constable Chan Peer Shah of District Police Mansehra (copy enclosed).

As opined by AIG/Legal CPO Peshawar that "SPD period was a contract service purely temporary basis, which cannot be considered".

Applicant may please be informed accordingly.

SAC
Per [Signature]

[Signature]
(SYED ANIS-UL-HASSAN)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

AP 07/Mansehra
11/3

S#: 1
Manshra
Pers #: 00716533 Buckle: 1296
Name: WAQAR HUSSAIN SHAH
CONSTABLE
CNIC No. 1350358987201
GPF Interest Applied
07 Active Temporary

P-Sec: 001 Month: July 2021
MA4027 -SR: SUPDIT: OF POLICE MANS
LAW AND ORDER MANSEHRA

NTN:
GPF #:
Old #:

MA4027 -21

PAYS AND ALLOWANCES:

0001-Basic Pay	11,600.00
1001-House Rent Allowance 45%	2,384.00
1210-Convey Allowance 2005	1,932.00
1300-Medical Allowance	1,500.00
1547-Ration Allowance	681.00
1567-Washing Allowance	150.00
1646-Constabulary R Allowance	300.00
1902-Special Incentive Allowance	775.00
2168-Fixed Daily Allowance	2,730.00
Gross Pay and Allowances	34,162.00

DEDUCTIONS:

GPF Balance 17,170.00	Subrc: 1,010.00
3530-Police wel: Fud BS-1 to 18	232.00
4004-R. Benefits & Death Comp:	450.00

Total Deductions

1,692.00

32,470.00

D.O.B
21.02.1993
07 Years 01 Months 026 Days

LFP Quota:
NATIONAL BANK OF PAKSHINKIARI
4149264666

Manshra

S#: 2

P Sec:001 Month:July 2021
MA4027 -SR: SUPDTT: OF POLICE MANS
LAW AND ORDER MANSEHRA

Pers #: 00716533 Buckle: 1296

Name: WAQAR HUSSAIN SHAH

NTN:

CONSTABLE

GPF #:

CNIC No.1350358987201

Old #:

GPF Interest Applied

07 Active Temporary

MA4027 -21

PAYS AND ALLOWANCES:

2211-Adhoc Relief All 2016 10%	922.00
2224-Adhoc Relief All 2017 10%	1,160.00
2247-Adhoc Relief All 2018 10%	1,160.00
2264-Adhoc Relief All 2019 10%	1,160.00
2309-Adhoc Relief All 2021 10%	1,160.00
2314-Risk Allow Police - 2021	5,754.00
5002-Adjustment House Rent	794.00

Gross Pay and Allowances

34,162.00

DEDUCTIONS:

GPF Balance 17,170.00

Subrc:

Total Deductions

1,692.00

32,470.00

D.O.B

LFP Quota:

21.02.1993

NATIONAL BANK OF PAKSHINKIARI

07 Years 01 Months 026 Days

4149264666

S#: 3
Manshra
Pers #: 00717332 Buckle: 1256
Name: ADIL SHEHZAD
CONSTABLE
CNIC No.1350390777325
GPF Interest Applied
07 Active Temporary

P Sec:001 Month:July 2021
MA4027 -SR: SUPDIT: OF POLICE MANS
LAW AND ORDER MANSEHRA

NTN:
GPF #:
Old #:

MA4027 -21

PAYS AND ALLOWANCES:

0001-Basic Pay	11,600.00
1001-House Rent Allowance 45%	2,384.00
1210-Convey Allowance 2005	1,932.00
1300-Medical Allowance	1,500.00
1547-Ration Allowance	681.00
1567-Washing Allowance	150.00
1646-Constabulary R Allowance	300.00
1902-Special Incentive Allowance	775.00
2168-Fixed Daily Allowance	2,730.00
Gross Pay and Allowances	34,162.00

DEDUCTIONS:

GPF Balance	17,170.00	Subrc:	1,010.00
3530-Police wel:Fud BS-1 to 18			232.00
4004-R. Benefits & Death Comp:			450.00

Total Deductions 1,692.00
32,470.00

D.O.B 14.03.1986 LFP Quota:
07 Years 02 Months 017 Days ALLIED BANK LIMITED Punjab Chowk Mansehr
0010048787680014

S#: 4
Manshra
Pers #: 00717332 Buckle: 1256
Name: ADIL SHEHZAD
CONSTABLE
CNIC No.1350390777325
GPF Interest Applied
07 Active Temporary

P Sec:001 Month:July 2021
MA4027 -SR: SUPDIT: OF POLICE MANS
LAW AND ORDER MANSEHRA
NTN:
GPF #:
Old #:

MA4027 -21

PAYS AND ALLOWANCES:

2211-Adhoc Relief All 2016 10%	922.00
2224-Adhoc Relief All 2017 10%	1,160.00
2247-Adhoc Relief All 2018 10%	1,160.00
2264-Adhoc Relief All 2019 10%	1,160.00
2309-Adhoc Relief All 2021 10%	1,160.00
2314-Risk Allow Police - 2021	5,754.00
5002-Adjustment House Rent	794.00

Gross Pay and Allowances 34,162.00

DEDUCTIONS:

GPF Balance 17,170.00

Subrc:

Total Deductions 1,692.00

32,470.00

D.O.B
14.03.1986
07 Years 02 Months 017 Days

LFP Quota:
ALLIED BANK LIMITED Punjab Chowk Mansehr
0010048787680014

S#: 1

Manshra

Pers #: 00717532 Buckle: 91

Name: SYED NAEEM SHAH

CONSTABLE

CNIC No.1350380886667

GPF Interest Applied

07 Active Permanent

PAYS AND ALLOWANCES:

MA4027 -21

0001-Basic Pay	12,210.00
1001-House Rent Allowance 45%	2,384.00
1210-Convey Allowance 2005	1,932.00
1300-Medical Allowance	1,500.00
1547-Ration Allowance	681.00
1567-Washing Allowance	150.00
1646-Constabulary R Allowance	300.00
1902-Special Incentive Allowance	775.00
2168-Fixed Daily Allowance	2,730.00
Gross Pay and Allowances	35,016.00

DEDUCTIONS:

GPF Balance 34,321.00	
3530-Police wel:Fud BS-1 to 18	Subrc: 1,010.00
3534-R. Ben & Death Comp Fresh	244.00
	450.00

Total Deductions

1,704.00

33,312.00

D.O.B

01.03.1990

02 Years 08 Months 025 Days

LFP Quota:

NATIONAL BANK OF PAKMAIN BRANCH MANSEHRA
4014119041

Manshra

S#: 2

P Sec:001 . Month:July 2021
MA4027 -SR: SUPDTT: OF POLICE MANS
LAW AND ORDER MANSEHRA

Pers #: 00717532 Buckle: 91

Name: SYED NAEEM SHAH

CONSTABLE

CNIC No.1350380886667

GPF Interest Applied

07 Active Permanent

NTN:

GPF #:

Old #:

MA4027 -21

PAYS AND ALLOWANCES:

2211-Adhoc Relief All 2016 10%	922.00 ✓
2224-Adhoc Relief All 2017 10%	1,221.00 ✓
2247-Adhoc Relief All 2018 10%	1,221.00 ✓
2264-Adhoc Relief All 2019 10%	1,221.00 ✓
2309-Adhoc Relief All 2021 10%	1,221.00 ✓ 2021
2314-Risk Allow Police - 2021	5,754.00 ✓
5002-Adjustment House Rent	794.00 ✓

Gross Pay and Allowances

35,016.00

DEDUCTIONS:

GPF Balance 34,321.00

Subrc:

Total Deductions

1,704.00

33,312.00

D.O.B

01.03.1990

02 Years 08 Months 025 Days

LFP Quota:

NATIONAL BANK OF PAKMAIN BRANCH MANSEHRA
4014119041

**Government of Khyber Pakhtunkhwa
District Accounts Office Manshra
Monthly Salary Statement (November-2018)**



Personal Information of Mr NAEEM SHAH d/w/s of CHAN PEER SHAH

Personnel Number: 00717532 CNIC: 1350380886667 NTN:
Date of Birth: 01.03.1980 Entry into Govt. Service: 16.06.2014 Length of Service: 04 Years 05 Months 016 Days

Employment Category: Active Temporary

Designation: SPECIAL POLICE FORCE 80003126-GOVERNMENT OF KHYBER PAKH

DDO Code: MA4027-SR: SUPDIT: OF POLICE MANSEHRA (LAW & ORDER)

Payroll Section: 001 GPF Section: 001 Cash Center: 21

GPF A/C No: Interest Applied: Yes GPF Balance: 0.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS:05 Pay Stage: 2

Wage type	Amount	Wage type	Amount
0045 Fixed Pay / Salary	15,000.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till November-2018: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 15,000.00 Deductions: (Rs.): 0.00 Net Pay: (Rs.): 15,000.00

Payee Name: NAEEM SHAH

Account Number: 4014119041

Bank Details: NATIONAL BANK OF PAKISTAN, 230364 MAIN BRANCH MANSEHRA MAIN BRANCH MANSEHRA, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: MANSEHRA

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:

Attended
Inspector
Manshra

(456510/27.11.2018/08:34:00) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Government of Khyber Pakhtunkhwa
District Accounts Office Manshra
Monthly Salary Statement (December-2020)



Personal Information of Mr SYED NAEEM SHAH d/w/s of CHAN PEER SHAH

Personnel Number: 00717532 CNIC: 1350380886667 NTN:
 Date of Birth: 01.03.1990 Entry into Govt. Service: 08.11.2018 Length of Service: 02 Years 01 Months 025 Days

Employment Category: Active Permanent

Designation: CONSTABLE 80003126-GOVERNMENT OF KHYBER PAKH

DDO Code: MA4027-SR: SUPDTT: OF POLICE MANSEHRA (LAW & ORDER)

Payroll Section: 001 GPF Section: 001 Cash Center: 21

GPF A/C No: Interest Applied: Yes GPF Balance: 27,251.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 07 Pay Stage: 2

Wage type		Amount	Wage type		Amount
0001	Basic Pay	12,210.00	1000	House Rent Allowance	1,589.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,530.00
1902	Special Incentive Allowance	775.00	2168	Fixed Daily Allowance *	2,730.00
2211	Adhoc Relief All 2016 10%	922.00	2224	Adhoc Relief All 2017 10%	1,221.00
2247	Adhoc Relief All 2018 10%	1,221.00	2264	Adhoc Relief All 2019 10%	1,221.00

Deductions - General

Wage type		Amount	Wage type		Amount
3007	GPF Subscription	-1,010.00	3530	Police wel:Fud BS-1 to 18	-244.00
3534	R. Ben & Death Comp Fresh	-450.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till December-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 29,982.00 Deductions: (Rs.): -1,704.00 Net Pay: (Rs.): 28,278.00

Payee Name: SYED NAEEM SHAH

Account Number: 4014119041

Bank Details: NATIONAL BANK OF PAKISTAN, 230364 MAIN BRANCH MANSEHRA MAIN BRANCH MANSEHRA, MANSEHRA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: MANSEHRA

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:

(310869/06.01.2021/10:21:28) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Actual
Inspector
Mansehra

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

SERVICE APPEL NO. 7348 of 2021.

Syed Naeem Shah son of Chan Peer Shah resident of Phagla
Post Office Attarshisha presently Dak Bangla Mohallah Sainabad
District MansehraAppellant

VERSUS

Government of Khyber Pakhtunkhwa and others.

..... Respondents

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Deponent

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEL NO. 7348 of 2021.

Syed Naeem Shah son of Chan Peer Shah resident of Phagla Post Office Attarshisha presently Dak Bangla Mohallah Sainabad District MansehraAppellant

VERSUS

Government of Khyber Pakhtunkhwa and others.

.....Respondents

Parawise reply by respondents:

RESPECTFULLY SHEWETH:-

PRELIMINARY OBJECTION:-

- a. That the appeal of the appellant is not maintainable in its present form.
- b. That the appellant has no locus standie against department.
- c. That the appellant has got no cause of action.
- d. That the instant appeal is liable to be dismissed due to mis joinder and non joinder of necessary and proper parties.
- e. That the appeal of the appellant does not fall within the ambit of relevant Law/Rules and regulation of police department, hence not maintainable and liable to be dismissed.
- f. That the appeal of the appellant is barred by law and limitation.

FACT:-

1. Para 0.1 of the facts is correct to the extent that appellant was appointed as Special Police Officer in police department on contract basis while he was not permanent employee of police department nor he was appointed as driver.
2. Para No. 02 of the facts needs no reply as the appellant was previously appointed on contract basis as Special Police Force on 16.05.2014, therefore, after the appellant appeared in ETEA test and appointed

as driver constable on 08.11.2018, therefore the appellant is not entitled for his regularization of his previous service as Special Police Officer.

3. Para No.03 of the facts needs no reply as the appellant had already been appointed as driver constable through Endst: No. 1680-10 dated 08.11.2018. **(Copy of the appointment order is annexure A).**
4. That as per Para No. 04 of the facts some special Police Officers working in district Mansehra were regularized but the police officers who were regularized were not previously appointed through ETEA test.
5. Para No. 05 of the facts is wrong, illegal and against contract basis service of the appellant in Special Police Force could not be considered as regular post because the appellant previously appeared in ETEA test and had already been appointed as driver constable, hence the appeal of the appellant is liable to be dismissed.
6. Para No. 6 of the facts incorrect as the appellant has no right to move an application for his regularization of special police officer after his appointment on 08.11.2018 through ETEA.
7. Para No. 7 of the facts is incorrect. The appellant does not come before this Honorable Tribunal with clean hands. The appellant mislead the facts before this Honorable Tribunal through unsound grounds.
8. Para No. 08 of the facts is incorrect. The appellant cannot take the benefit of his temporary service length his special police officer for his regularization. The respondents have not made discrimination with appellant and no irregularity has ever been committed by the respondents.
9. Para No. 9 of the facts is incorrect. The responder No. 3 rightly rejected the application of appellant and the same is not maintainable to service law/rules.


10. Para No. 10 of the fact along with the ground are incorrect. Appellant has no cause of action to file the appeal.

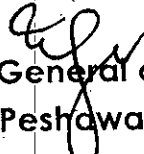
GROUNDS:-

- A. Para No. "A" of the grounds is wrong, illegal, against the law/rules and against the principle of natural justice. The past service of the appellant on contract basis as Special Police Officer cannot be considered as regular post through notification dated 08.04.2020 because the appellant had already been appointed as driver constable through ETEA test vide order No. 16806-10 dated 08.11.2018, therefore the instant appeal is not maintainable.
- B. Para No. "B" of the grounds is incorrect, the appellant has no vested right with the instant matter.
- C. Para No. "C" of the ground is wrong, illegal, against the facts and against the law and relevant rules of the police department.
- D. Para No. "D" of the ground is incorrect, this honorable Tribunal has got no jurisdiction to entertain the instant appeal.
- E. Respondents may also be allowed to raise other grounds at the time of hearing of appeal.

PRAYER:

In view of above, the appeal in hand is not maintainable may kindly be dismissed with cost, please.


District Police Officer
Mansehra
(Respondent No. 3)


Inspector General of Police
KPK Peshawar
(Respondent No. 2)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

SERVICE APPEL NO. 7348 of 2021.

Syed Naeem Shah son of Chan Peer Shah resident of Phagla Post Office Attarshisha presently Dak Bangla Mohallah Sainabad District MansehraAppellant


VERSUS

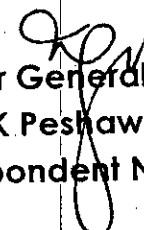
Government of Khyber Pakhtunkhwa and others.

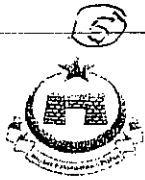
.....Respondents

AFFIDAVIT

We respondents do solemnly affirm and declare that the contents of the reply/comments are true and correct to our knowledge and belief and that nothing has been concealed from this Honorable tribunal.


District Police Officer
Mansehra
(Respondent No. 3)


Inspector General of Police
KPK Peshawar
(Respondent No. 2)



Annex-A

POLICE DEPARTMENT

MANSEHRA DISTRICT

ORDER

As recommended by the recruitment committee of Educational Testing & Evaluation Agency Khyber Pakhtunkhwa (ETEA) the following candidates who have qualified /selected by the said committee and after fulfilling other formalities are hereby appointed as Driver Constable against the available vacant posts of Driver Constable in BPS-7 (10990-610-29290) with effect from 08-11/2018. Their appointments are purely on temporary basis and are liable to be terminated at any time without assigning any reason within 14 days.

S No.	Name of Candidate	Father Name	Date of Birth	Height	Chest	Address	Allotted No.
1	Syed Naheem Shah	Syed Chan Pir Shah	01.03.1990	5-9 1/2	37 1/2 x 39	Village Phagla Tehsil & District Mansehra	260
2.	Ghulam Mustafa	Abdur Rehman	09.04.1988	5-9	33x34 1/2	Village Domna Chatter Plain Tehsil & District Mansehra	846
3.	Afzaal Ahmad	Ali Asghar	02.02.1990	5-9	37x39	Village Seri Arbara Tehsil Oghi District Mansehra	765
4.	Shabbir	Habib ur Rehman	12.07.1989	5-10	35x37	Village Tanda near Jamia Masjid Farooqia Tehsil & District Mansehra	579

OB-175
08-11-18

A.
District Police Officer,
Mansehra

No. 16806-10 /OHC, dated Mansehra the 08-11/2018.

Copy of above is submitted to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for favour of information with reference to CPO Peshawar memo: No. 6129-59/E-IV, dated 09.08.2018, please.
2. Regional Police Officer, Hazara Region Office Abbottabad for favour of information with reference to Region Office Abbottabad Endst: No. 21847-54/EC, dated 29.08.2018, please.
3. District Accounts Officer, Mansehra.
4. Pay Officer DPO Office Mansehra.
5. SRC DPO Office Mansehra.

وکالت نامہ

کورٹ فیس

بعدالت جناب سر جسٹری جنرل سپریم کورٹ ریسٹ ہاؤس

عنوان: سپریم کورٹ ریسٹ ہاؤس نامہ

منجانب: ریسٹ ہاؤس

نوعیت مقدمہ: سرورس ایبل

باعث تحریر آئینہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔ لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المرقوم: 21/9/2022

بمقام:

السید
191
Add.

السید

سید اعجاز علی شاہ
سید اعجاز علی شاہ

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB AIA

APPEAL No. 7318 of 20 21

Syed Naqem Shah

Appellant/Petitioner

Versus

Through Secy: H & TA's Deptt
Pesh

RESPONDENT(S)

Resp No. Govt of KPK through
Secretary H & TA's Deptt
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-11-22 at 9:00 AM.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at court
At Peshawar
For Reply


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB A/A

APPEAL No. 7318 of 20 21

Syed Naqom Shah

Appellant/Petitioner

Versus

through Socy. H & T A's Deptt
Pesh


RESPONDENT(S)

ROSP NO
Notice to Appellant/Petitioner Govt of KPK through
Secretary H & T A's Deptt
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-11-22 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
A/Abad
For Reply


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

TB AIA

No.

APPEAL No. 7348 of 2021

Syed Naem Shah

Appellant/Petitioner

Versus

Through Secy: Hq TA's Pesh

RESPONDENT(S)

RESP No 2 Inspector General
of Police Peshawar

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-11-22 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
At Adad
For Reply

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JUDICIAL COMPLEX (OLD), KHYBER ROAD,
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[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD
PESHAWAR.

No.

APPEAL No. 7348 of 2021

TB AIA

Syed Nabeem Shah

Appellant/Petitioner

Versus

Through Secy. H & TA's Pesh

RESPONDENT(S)

RESP No 3

District Police

Notice to ~~Appellant/Petitioner~~

offices

Manshera

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on 17-11-22 at 9.00 AM

To: may, be
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A/Asst
For Reply

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB AIA

APPEAL No. 7348 of 20 21

Syed Naseem Shah

Appellant/Petitioner

Versus

Through Secy - H & TA's Pesh

RESPONDENT(S)

Respon No 3 District Police
Notice to Appellant/Petitioner
officer Mansehra

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APPEAL No. 7348 of 20 21

Syed Naeem Shah

Appellant/Petitioner

Versus

through Sery: H & TA's Pesh

RESPONDENT(S)

Resp No 4 District Accounts

Notice to Appellant/Petitioner

officer Mmsehra

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Peshawar.

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
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