Service Appeal No. 7669/2021

³27th September, 2022

Learned counsel for the appellant present and heard.

2. Through this appeal, the appellant has prayed for setting-aside merit list prepared by the official respondents for the project post of Assistant Director and the directions were further sought to consider the degree of M. Phil (Bio-Chemistry) of the appellant thereby considering his name for the project post of Assistant Director. It is observed that at the very outset, that the desired relief being outside the jurisdiction of this Tribunal, therefore, original memo of appeal alongwith copies of its be returned to the appellant/his counsel while original order sheets and copies of the memo and grounds of appeal as well as copies of the accompaniments be placed on this file and it be consigned.

3. Pronounced in open court in D.I.Khan and given under my hands and seal of the Tribunal this 27th day of September, 2022.

(Kalim Arshad Khan) Chairman Camp Court D.I.Khan

Hidayatullah

27th September, 2022

-the

Learned counsel for the appellant present and heard.

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> (Kalim Arshad Khan) Chairman Camp Court D.I.Khan

30.06.2022

Nemo for the appellant.

the strangth of Previous date was changed on Reader Note, therefore, notice be issued to the appellant as well as his counsel for preliminary hearing on 22.08.2022 before S.B at Camp Court, D.I.Khan.

(Mian Muhammad)

Reader

Member (E) Camp Court, D.I.Khan

22.08.2022

Due to summer vacation, the case is adjourned for the same on

26.09.2022.

26th Sept 2022

Counsel for the appellant present.

Learned counsel for the appellant seeks time to prepare the case. To come up for preliminary hearing on 27.09.2022 before S.B at Camp Court, D.I. Khan.

(Kalim Arshad Khan) Chairman Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of___

1

(A)

-	Case No	7669 /2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2021	The appeal of Mr. Hidayat Ullah Khan resubmited today by Mr. Ahsan Bilal Langrah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-		REGISTRAR This case is entrusted to touring S. Bench at D.I.Khan. Notices be
2-		issued to appellant/counsel for preliminary hearing to be put there on 131221 .
		CHARMAN
		· ·
15.12.	2021 Ap	pellant present in person.
		made a request for adjournment as his counsel is not ble today; granted. To come up for preliminary arguments
		02.2022 before S.B at Camp Court, D.I.Khan.
	21/2/2021	(Rozina Rehman) Member (J) Camp Court, D.I.Khan
		Camp Court, D.I.Khan Due to refirent of Mu Homble Chairman to come up For the same as before on 30/6/2012
-		the same as before on 30/6/2012
:		Ranch

The appeal of Mr. Hidayatullah Khan Marwat FWA Population Welfare Department D.I.Khan received today i.e. on 11.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1. Check list is not attached with the appeal.
- 2. Appeal has not been flagged/marked with annexures marks.
- 3. Annexures of the appeal may be attested.
- 4. Copy of appointment order of respondent no. 5 is not attached with the appeal which may be placed on it.
- 5. Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1998 /S.T.

Dt. 11 / 10 /2021

Mr. Ahsan Bilal Langrah Adv. High Court D.I.Khan.

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REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

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2. 	2. Whether the suit is made over the Court of Senior Civil Judge		+ V
.	Address of parties		
4.	List of Legal Heirs		
5.	Whether this Court has a. Pecuniary		
	Jurisdiction b. Territorial c. Subject Matter		
6.		······	+. <u>-</u>
7.	Documents on which plaintiff relies		
3.	List of Other documents		
).	Whether the suit is prima facie within time		
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<u>).</u>	the provision of S.91 C.	P.C are complied with	
<u> </u>	- whether provisions of S-92 are	omplied with	
2.	Processes of Order 1 Rule 8 of	C.P.C complied with	
	Or detendant whether provision of Order-32	C.P.C are Omplied with	
	AFTER INSTITUTION		
_	Written Statement		
	If set off is claimed, whether Court fee is annexed		
	Whether plea of Jurisdiction is taken ? if yes, whether decided Whether plea mis-joinder and non-joinder of cause of action and partic decided	es taken ? If yes, whether	
 .	Issues framed		
	Whether suit can be disposed of on basis of legal issues only		
	Whether suit can be disposed of on first hearing	· · · · · ·	
	List of witnesses /		
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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN

Service Appeal No. 7669/2021

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Hidayat Ullah Khan Marwat (Appellant)

VERSUS

Govt. of Khyber Pakhtukhwa and others (Respondents)

SERVICE APPEAL

S.No	Particulars of the Documents	Annexure	Page
1.	Grounds of Service Appeal and affidavits		1-6
2.	Copies appointment order with relevant record	Α	7-39/
3.	Copy of advertisement	В	10-13
4.	Copies of short lists	С	1614
5.	Copy of the office order No.I(II)2021- 22/Innovative/Recruitment dated 18/06/2021 and Yeply-	D E	15-17
6.	Copies of the departmental appeal	- 69 -69 F	18-19
7.	Copy of the merit list	G	120
8.	Copies of educational qualifications	H	21-28-
9.	Wakalatnama grent of man		2605

INDEX

Date: 25/08/2021

Aude

Yours Humble Appellant

Hidayat Ullah Khan Marwat

Through Counsel, Ahsam Bilal Langrah

Advocate High Court



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN

Service Appeal No. 7669/2021

ee Tribunal Diary No. 77/3 Dated 11-10-201

Hidayat Ullah Khan Marwat son of Haji Surana Khan caste Marwat r/o Zamirabad Colony, Muryali Dera Ismail Khan. Presently serving as a Family Welfare Assistant, Population Welfare Department Dera Ismail Khan. Cell#0341-3624929.

..... <u>Appellant</u>

VERSUS

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Population Welfare Department Khyber Pakhtunkhwa Peshawar.
- 2. Director General Population Welfare Department Khyber Pakhtunkhwa Peshawar.
- 3. Syed Imran Shah, Project Director (Innovative Scheme) Khyber Pakhtunkhwa Peshawar.

4. District Population Welfare Officer, Dera Ismail Khan.

 Muzakkir Shah son of Abdullah Shah, presently proposed as Assistant Director, Innovative Scheme Project, Population Welfare Department, KPK, Peshawar.

.....<u>.Respondents.</u>

APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED MERIT LIST FOR THE POST OF ASSISTANT DIRECTOR (INNOVATIVE SCHEME) POPULATION DEPARTMENT KPK PESHAWAR PUBLISHED AT THE WEBSITE OF POPULATION DEPARTMENT VIDE WHICH THE PRIVATE RESPONDENT (MUZAKKIR SHAH) IS CONSIDERED/PROPOSED AS TOP ON MERIT BY DEPRIVING THE APPELLANT FROM HIS VALUABLE RIGHT.

Re-submitted and filed.

to -day

<u>PRAYER</u>

i.

On acceptance of this appeal with the following prayers,

The impugned merit list for the Project Post of Assistant Director Equivalent to BPS-17 under ADP Scheme "Innovative Scheme for Promotion of Population Welfare Programme in favour of the private respondent (Muzakkir Shah) may kindly be set aside.

ii. .

The respondents may kindly be directed to consider the degree of M. Phil (Bio-Chemistry) of appellant and consider the name of appellant for the Project Post of Assistant Director Equivalent to BPS-17 according to law.

Any other relief which this Tribunal deemed appropriate may kindly be given to the appellant.

Respectfully Sheweth:-

The Appellant most respectfully submits as under:-

- That the appellant was appointed in District Population Welfare Department Dera Ismail Khan in 1998 (for Project Male Mobilizer) and thereafter appointed as Family Welfare Assistant (BPS-07) on 06/02/2018 and has been serving the department with great zeal, zest and to the entire satisfaction of his superiors. In this respect the service record of the appellant is very much evident. Copies appointment order with relevant record are jointly annexed as Annexure-A.
- That the respondent#3 published an advertisement for different posts including the Project Post of Assistant Director Equivalent to BPS-17, Instructor BPS-17 in RTI and Senior Instructor BPS-18 in RTI under ADP Scheme "Innovative Scheme for Promotion of Population Welfare Programme. Copy of advertisement is annexed as <u>Annexure-B</u>.

- 3. That the appellant being fully qualified for the above said posts, applied for all the three posts and later on appeared in the written test held on 14th & 15th October 2020 in Peshawar under ETEA and qualified for the post of Assistant Director by obtaining Marks 62/100 and short listed for the above mentioned three posts. Copies of short lists are annexed as **Annexure-C**.
- 4. That thereafter the respondents conducted interview in April 2021 but ironically the appellant was not called in the said interview by raising baseless objections of qualification as well as over-age. Pertinent to mention here that both the objections raised by the respondents are baseless and not binding upon the appellant but the same are due to mala-fide intention and just to deprive the appellant from his valuable rights. Copy of office the order No.I(II)2021-22/Innovative/Recruitment dated 18/06/2021 is annexed as Annexure-D.
- 5. That feeling aggrieved by the illegal acts of respondents, the appellant preferred a departmental appeal dated 14/06/2021 which was duly replied by the respondent#3 vide letter dated 06/08/2021 in which same baseless objections were repeated by the respondents. Copies of the departmental appeal and its reply dated 06/08/2021 are annexed as <u>Annexure-E & F</u>.
- 6. That thereafter the respondents published the impugned merit list for Project Post of Assistant Director Equivalent to BPS-17 under ADP Scheme "Innovative Scheme for Promotion of Population Welfare Programme in which the private respondent (Muzakkir Shah) is showing on top of the list. Copy of the merit list is annexed as <u>Annexure-G</u>.
- 7. That feeling aggrieved by the impugned acts and omission of the respondents, the instant appeal is being filed before this learned Tribunal under section 4 of the KPK Service Tribunal Act, 1974, inter alia on the following grounds:

GROUNDS

- A. That the act of respondents is illegal, unjustified and without jurisdiction, hence, liable to be set aside by this Honourable Tribunal.
- B. That the appellant has done his M.Phil (Bio Chemistry) while according to the advertisement the basic qualification for the post of Assistant Director was required as Master in Sociology, hence, the qualification of the appellant is equaliant to the required degree. Degree in Pharmacy and M.Phil in Bio Chemistry which do come under the definition of Sciences Social HEC vide notification#DD/SS&H/ CDSSHP/List/2015 dated 03/02/2015. Hence, the appellant is eligible for the post of Assistant Director but the respondents are intending to deprive the appellant from his valuable right. Copies of educational qualifications are annexed as Annexure-H.
- C. That the respondents raised second objection about the age of appellant which is also baseless because the appellant has been serving in the same department since 1998 up-till now and the terms & conditions of age are not applicable in case of appellant. Moreover, the respondent did not mention any condition of age that the conditional will may be

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D. That as per advertisement's terms and conditions the candidates who passed the written test and shortlisted will be called for interview. It is evident from documentary evidence that the appellant passed the EATA test and short listed but the respondent did not call the appellant for interview which is against the natural justice. Hence, the respondents are duty bound to consider the name of appellant for interview and thereafter the appellant may be appointed as Assistant Director in the said project as per merit list.

E. That the appellant has been serving the same department since 1998 with great zeal, zest and honesty in this period no complaint whatsoever has ever been made against the appellant which is evident from the service record of

entitle a



appellant, hence, the appellant is entitled to be considered for the post of Assistant Director.

F. That the Counsel for the appellant may kindly be allowed to raise further legal grounds during the course of arguments.

It is therefore, humbly prayed that on acceptance of this appeal with the following prayers,

The impugned merit list for the Project Post of Assistant Director Equivalent to BPS-17 under ADP Scheme "Innovative Scheme for Promotion of Population Welfare Programme in favour of the private respondent (Muzakkir Shah) may kindly be set aside.

The respondents may kindly be directed to consider the degree of M. Phil (Bio-Chemistry) of appellant and consider the name of appellant for the Project Post of Assistant Director Equivalent to BPS-17 according to law.

Any other relief which this Tribunal deemed appropriate may kindly be given to the appellant.

Date: 25/08/2021

Yours Humble Appellant

Hidayat Ullah Khan Marwat

Through Counsel,

Advocate High Court

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN

P=65

Service Appeal No.____/2021

Hidayat Ullah Khan Marwat (Appellant)

VERSUS

Govt. of Khyber Pakhtukhwa and others (Respondents)

SERVICE APPEAL

<u>AFFIDAVIT</u>

I, **Hidayat Ullah Khan Marwat** son of Haji Surana Khan caste Marwat r/o Zamirabad Colony, Muryali Dera Ismail Khan, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: 25/08/2021

Dated: 25/08/2021

DEPONENT

CNIC#12101-0971808-7

CERTIFICATE

It is certified that no such service appeal has earlier been filed with same subject matter before this Honourable Tribunal.

WP

DEPONENT Through Counsel

11.	THX-APP-7
A STATE OF S	OFFICE OF THE DISTRICT POPULATION WELFARE OFFICER DERA ISMAIL KHAN ZAKORI TOWN, DARABAN ROAD PH#/Fax: 0966-9280208
OFFER OF	APPOINTMENT 68 75 Dated D.I.Khan the 06/02/2018

F.No.8(30)/2011-16/Rec:/Admn: In compliance with the judgment of the Honourable Peshawar High Court, D.I.Khan Bench dated 03/12/2015 in W.P. No.131-D/2012 and order sheet of COC No.205-D/2016 Dated 10.01.2018, you are hereby offered appointment as Family Welfare Assistant (Male) BPS-07 on the following terms and conditions with immediate effect.

- 1. Your appointment is subject to the fate of this Department Civil Petition No.154-P/2016 pending in the August Supreme Court of Pakistan or stay/suspension order from the Appex Court whichever is earlier.
- 2. You shall get pay at the minimum of pay scale BPS-07 (10,990-610-29,290) including usual allowances as admissible under the rules. You will also be entitled to annual increment as per existing policy.
- 3. You shall be governed by the NWFP (Khyber Pakhtunkhwa) Civil Servants Act, 1973 and all the laws applicable to the Civil Servants and rules made there under.
- 4. Your employment is temporary as per Govt: rules/policy. Your services are liable to be terminated without assigning any reason at fourteen (14) days notice or on the payment of 14 days salary in lieu of the notice. In case you wish to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
- 5. You shall, initially, be on probation for a period of one year extendable uptortwo years.
- 6. You shall produce a medical certificate of fitness from Hospital Director, MTI, DIKhan before reporting yourself for duty as required under the rules.
- 7. You have to join duty at your own expenses.
- 8. You may be posted anywhere in District D.I.Khan.
- 9. Your appointment is subject to verification of your testimonials and character from quarter concerned.
- 10. If you accept the above terms and conditions, you should report for duty to the District Population Welfare Officer, D.I.Khan within 15 days of the receipt of this offer failing which your appointment shall be considered as cancelled

1421-28:

(NIZAM-UD-DIN) District Population Welfare Officer, Dera Ismail Khan

<u>Mr. Hidayat Ullah s/o Haji Sooran Khan</u> R/O Ziarat Pir Zakoori Sahib, Daraban Road, District, DIKhan Copy of the above is forwarded for information and n/action to the:-

- 1. Director General, PW-Department, KPK, Peshawar.
- 2. PS to Secretary to Government of Khyber Pakhtunkhwa, PW-Department, Peshawar.
- 3. Additional Registrar, Peshawar High Court DIKhan Bench.
- 4. District Accounts Officer, DIKhan.
- 5. Assistant Director, NADRA, DIKhan with the request to verify the above mentioned appointee CNIC as per Finance Department, KPK, Notification No. SO(ESTT/FD/2016/Inquiry/B.Gram dated 28.02.2017.
- 6. Accountant (Local), DPW Office, D.I.Khan.
- F.No.6 (15)/2016-Admn
 Personal File.

District Population Welfare Officer, Dera Ismail Khan

WVERNMENT OF NWEP

	F.No. 1(1)/98-VEFPWS.
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	SUBJECT: ENROLMENT AS THE VILLAGE BASED FAMILY PLLANING WORKER(M-VEFPWS)
	Reference you of Mication and interview Dated
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	Union Council Ichsil of Bistrict
	under Village Pase? Tamily Planning Project ?
•	2. You will be past a retainer fet @ Rs. 1200/- (Rapees One Thousand and
	Two Hundred only) per month from the date you join the training. During traing
•	Toriod you will be given Radio (Rupees Seven Hundred and Fifty only) per month
	in addition to retationer fee.
	3. You will be provided a sign Board to be installed out side your
-	residence. 31-5-2005 in Likely I
	4. You-menn large is montrast basis upto the which may/be
	extendet and can be discontinued earlier if your work is found ussatisfactory.
· · ·	5. Your main responsibilities are as under:-
	-to register chagable couples in your village.
	-to visit 10-15 aligible couple every working day and ensure a revisit event 25m onths.
• ,	-to provide Family Planning Services in the village through
	regular is no vecits. -to refer modifyite! clients to nearest service delivery outlet for
	I.U.D insertion, Contraceptive Surgery and initial dose of injectables
	-to provide treatment for emmon ailment.
	-to assist M.S.U and F.P.Centre stuff in arranging T.U.D camps im your village.
	-to keep clear Statison with influential man in the village including local inheritation introduced
	-to submit monthly programmer rort.
	If the above conditions are acceptable report for training at
	District Population Welface Officer Office Situated at Chab Syed Munawar, near
. '	Hestel of Govt: Degree a llago 1 D. I. Khan on
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	(FACIR JAMIL AHMAD)

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Director (A&C) /Project Director Populatics Welfare Deptt; NWFP Peshawar for his kind information with reference to his letter F.Ne. 2(1)/96-VBFFWS. Futed 13.3.98 please.

Divisional Director Proplation Welfare Deptt: DIKhan Division DIKhan for information please.

P/2

Assistant District Population Welfare Officer, Dikhan for information with the request to impurt the training to the Male F.P. Worker concerned please.

Accounts Asstt: local for information and neessary action.

District Accounts Officer DIKhan for information and n/action please. Personal File of the (M) F.F.Worker concerned.

> (FAQIR JAMIL AHMAD) . District Population Welfare Officer Dera Ismail Khan.

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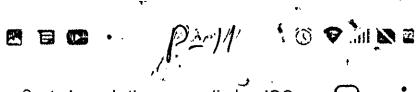
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AHX-C/P-14 Short listing by ETEA Dear HIDAYAT ULLAH KHAN you are the post of shortlisted for the post of Assistant

Dear HIDAYAT ULLAH KHAN you are shortlisted for the post of Assistant Director (BPS-17) kindly submit a duly attested copy of the following documents to the Project Director, Innovative Scheme for Promotion of Population Welfare Programme, Plot # 18, Street # 5 Sector E-8, Phase-7, Hayatabad within 7 (seven) days. 2 Pictures, CNIC, Domicile, all educational and experience certificates and training certificates if any

Dear HIDAYAT ULLAH KHAN you are shortlisted for the post of Instructor (BPS-17) kindly submit a duly attested copy of the following documents to the Project Director, Innovative Scheme for Promotion of Population Welfare Programme, Plot # 18, Street # 5 Sector E-8, Phase-7, Hayatabad within 7 (seven) days. 2 Pictures, CNIC, Domicile, all educational and experience certificates and training certificates if any

Dear HIDAYAT ULLAH KHAN you are shortlisted for the post of Senior Instructor(Non-Tech) (BPS-18) kindly submit a duly attested copy of the following documents to the Project Director, Innovative Scheme for Promotion of Population Welfare Programme, Plot # 18, Street # 5 Sector E-8, Phase-7, Hayatabad within 7 (seven) days. 2 Pictures, CNIC, Domicile, all educational and experience certificates and training certificates if any 7:22 AM Short Disting 7r The post of Instructor

Assistant Director.

C Tienell

Short Listing for The post of Senior Instructor

Government of Khyber Pakhtunkhwa Office of the Project Director Innovative Scheme for Promotion of Population Welfare Programme Population Welfare Department, Plot # 18 St # 5 Sector E/8 Phase-7 Hayatabad, Peshawarj Ph: 091-9219031 | E-mail: Ispwkp@gmail.con

F.No.I(11)/2021-22/Innovative/Recruitment

То

Peshawar, the 18th June 2021

)

The Secretary, Government of Khyber Pakhtunkhwa, Population Welfare Department, Peshawar.

Subject:

<u>REQUEST FOR INJUSTICE IN THE APPOINTMENT OF CANDIDATE</u> <u>FOR THE PROJECT POST OF ASSISTANT DIRECTOR BPS-17 IN</u> <u>POPULATION WELFARE DEPARTMENT PESHAWAR</u>

Dear Sir.

I am directed to enclose herewith an appeal received from Mr Hidayatullah Khan s/o Haji Surana, FWA (M) at District Population Welfare Office DI Khan on the subject noted above. The candidate appeared in ETEA tests for the posts of Assistant Director, Instructor and Senior Instructor under Innovative Scheme for Promotion of Population Welfare Programme and claimed to have been shortlisted for the said posts, but not called for interview.

The applicant was neither shortlisted nor called for interview due to the following

reasons:

i. The candidate's date of birth is 10.04.1971, therefore, he was found to be 8 years and 3 years above the upper age limit on the closing date i.e. 29/11/2019. The upper age limit for the project post of Assistant Director and Instructor is 40 years while for the post of Senior Instructor, the upper age limit is 45 years.

ii. The candidate did not meet the required academic qualification advertised for the project posts of Assistant Director, Instructor and Senior Instructor i.e Masters in Social Science. (Copy of Advertisement Attached at Annex: "A"). The academic certificates/degrees submitted by the candidate shows the candidate has a Bachelor's Degree in Pharmacy and MPhil in Bio-Chemistry, which do come under definition the of Social Sciences vide HEC notification DD/SS&H/CDSSHP/List/2015 dated 3/2/2015. (Copy of HEC notification along with photocopy of documents of the candidate attached at Annex: "B" & "C").

Furthermore, regarding the candidate's contention that those selected against the post of Assistant Director obtained less marks in the ETEA test, it is submitted that as per Para 3(iv) of the Project Policy. ETEA test was conducted as a screening tool only for facilitation of the Project Selection Committee. Further grading of all candidates have been made in accordance with the criteria explained in para 6 of the project policy. (Criteria for Selection as explained in Pata 6 of the Project Policy attached at Annex: "D").

In light of the above, and since the candidate does not meet "age limit" as well as "minimum prescribed qualification" against any of the said posts, it is therefore, requested that the enclosed appeal of the candidate Mr. Hidayatullah Khan s/o Haji Surana Khan may please be regretted.

Yours faithfully.

Syed Imran Shah) Project Director (Innovative Scheme)



Government of Khyber Pakhtunkhwa Office of the Project Director Innovative Scheme for Promotion of Population Welfare Programme Population Welfare Department, Plot # 18 St # 5 Sector E/8 Phase-7 Hayatabad, Peshawar| Ph: 091-9219031 | E-mail: Ispwkp@gmail.com



1(11)/2020-21/Innovative/ Recruitment

Peshawar, the 6th August, 2021

То

Mr. Hidayatullah Khan s/o Haji Surana. (FWA-Male), FWA, FWC Zafarabad Population Welfare Department, Dera Ismail Khan.

Subject:

REQUEST FOR JUSTICE IN THE APPOINTMENT OF CANDIDATE FOR THE PROJECT POST OF ASSISTANT DIRECTOR BPS-17 IN POPULATION WELFARE DEPARTMENT PESHAWAR

Mr. N. Mary San Ma

I am directed to refer to your appeal No: nil dated 14/06/2021 on the subject noted above and to enclose herewith this office self-explanatory letter of even No: dated 18/06/2021. It is further stated that the Competent Authority has regretted your appeal on the subject matter vide Admin Department letter No: SOB(PWD)4-1/2021/Innovative Project/2652-53 dated 07/07/2021.

(Syed Imran Shah) Project Director (Innovative Scheme)

Page # 72 Aashiq



GOVERNMENT OF KHYBER PAKHTUNKHWA, POPULATION WELFARE DEPARTMENT

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2nd Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

No. SOE (PWD) 4-1/2021/Innovative Project/2652-Dated Peshawar the 07th July, 2021

То

The Project Director (Innovative Scheme), Directorate of Population Welfare Khyber Pakhtunkhwa, Peshawar.

Subject: -

- REQUEST FOR INJUSTICE IN THE APPOINTMENT OF CANDIDATE FOR THE PROJECT POST OF ASSISTANT DIRECTOR BPS-17 IN POPULATION WELFARE DEPARTMENT PESHAWAR.

Dear Sir,

I am directed to refer to your letter No. No. 1(11)/2021-22/ Innovative/Recruitment dated 18-06-2021 on the subject cited above and to state that the application of Mr. Hidayatullah Khan S/O Haji Surana FWA (M) was processed; however, regretted by the Competent Authority on the grounds mentioned in your above quoted letter, please.

(August)

Yours faithfully,

(LAL SAEED KHATTAK) SECTION OFFICER (ESTT)

SECTION OFFICER (ESTT)

Cc to the:-

PS to Secretary, PWD, Khyber Pakhtunkhwa, Peshawar.

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The Director General,

Population Welfare Department,

KP-Peshawar Proper Channel (DPWO-D.I.Khan)

Through:

Sub: <u>(Request for justice in the appointment of candidate for the project post of Assistant</u> <u>Director-BPS-17 in Population Welfare Department Peshawar</u>)

Sir 🔹

With due respect it is stated that in November 2019 various vacancies announced by Population Welfare Department Peshawar, among which I also applied for the following three posts of;

1-Assistant Director BPS-17 (Project)

2-Instructor BPS-17 in RTI

3-Senior Instructor BPS-18 in RTI

Sir,

On 14th and 15th October 2020 written tests held in Peshawar under ETEA, and I qualified the test for Assistant Director by obtaining **marks 62/100** and shortlisted for the above three mentioned posts.

Now waiting for interview call, but as per our Department the interview is delay due to covid-19, and now I informed that interviews have finalized on 26th,27th and 28th April 2021,without call letter issue to me, although all the five candidates including the top most which have interviewed have less test marks than me, such as written test marks of;

1-Muzakkir Shah s/o Abdullah Shah Marks- 59/100

2-Muhammad Saqib s/o Muhammad Haroon Marks- 46/100

3-Sajjad Ahmad s/o Majeed Gul Late Marks- 53/100

4-Muhammad Taqweem s/o Muhammad Munir, Marks- 59/100

5-Hafiz Nasir Khan s/o Haji Musafar Khan, Marks- 47/100

1 . who

am a **Pharmacist with M.Phil** from Gomal University D.I.Khan, and served the Department for **17 years**, 14-years as a Male mobilize in a project and 03-years as a FWA BPS-07 in FWC Zafarabad; D.I.Khan and still continue to serve.

P-19 19 19

Sir,

Date-14-6-2021

Sir

I wish to do much more for the betterment of my Department on research basis.

Burg

So, I humbly request for yours kind consideration in the appointment of candidate for the post of Assistant Director-BPS-17 on merit.

Thanks

Note: All necessary documents are attached.

Yours sincerely

Hidayat Ullah Khan (Marwat)

FWA, FWC-Zafarabad, Population Welfare Department,

D.I.Khan

Cell no-03413624929

Email-hidayatkn6@gmail.com.

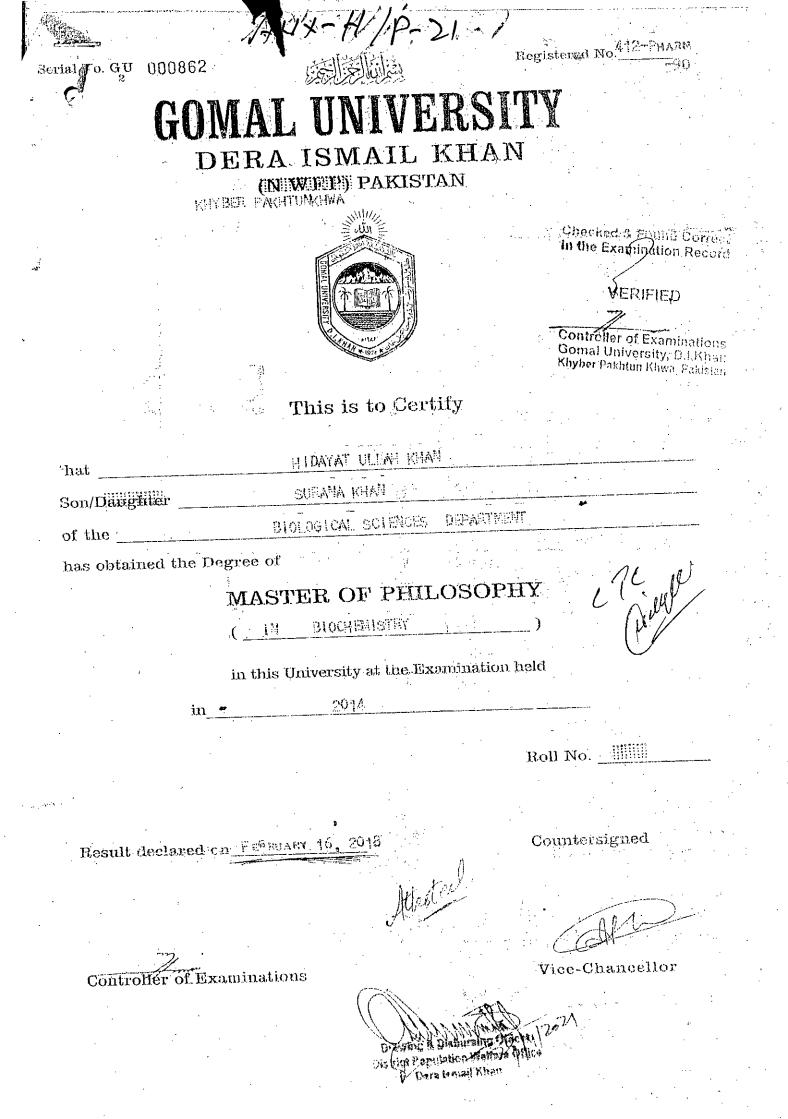
Total No of Post = 1

Merit List of Candidates for the Project Post of Assistant Director Equivalent to BPS-17 Under ADP Scheme "Innovative Scheme for Promotion of Population Welfare Programme"

	Under ADP Scheme "Innovative Scheme for Promotion of Population wehare Programme												
	· · ·	Personal Detail			Prescribed Educational Marks					Marks			
Merit Order No.	NAME	FATHER NAME	D.O.B	MAMSe	BA/BSc	FA/FSc	SSC	Higher Qualification	Experience	Sub Total	Total Interview M	Grand Total	Remarks
1	MUZAKKIR SHAH	ABDULLAH SHAH	26-May-86	15	15	15	15	7	6	73	7.50	80.50	
2:	MOHAMMAD SAQIB	MOHAMMAD HAROON	20-Jul-86	15	15	11	15	7	13.5	76.5	3.62	80.12	
3	SAJIAD AHMED	MAJEED GUL LATE	01-Apr-85	15	н	15	15	0	.15	71	5.60	76.60	
4	MUHAMMAD TAQWEEM	MUHAMMAD MUNIR	15-Apr-87	15	15	15	15	7	4.5	71.5	5.10	76.60	
-5	HAFIZ NASIR KHAN	HAJI MUSAFAR KHAN	01-Apr-84	12	11	.11	15	7	.15	71	5.5 0	76.50	

Page 1 of 1





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GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.F) PARISTAN



(Session_1990-94

SON of SURANA MHAN. a student of the Department of Pharmacy, Gomal University having passed the prescribed examination in <u>Nov/December</u>, 19.98 is this day admitted by the Gomal University to the DEGREE of

BACHELOR OF PHARMACY

obtained 2124 marks out of 3800

The Examination was taken as a whole/in parts.

412-FHARM-90 Registered Vo.

-TARAT UILAN PERS.

Controller o aminations

Roll No

1583

Countersigned

Vice-Chancellor

Windowsky, Strends Webbinst First



GOVERNMENT OF KHYBERPAKHTUNKWA OFFICE OF THE DISTRICT POPULATION WELFARE OFFICER DERA ISMAIL KHAN ZAKORI TOWN DARABAN ROAD PH/FAX:0966-933208

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F.No.12(13)/2016/Admn/ [>0]

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Dated DIKhan the 03/11/2020

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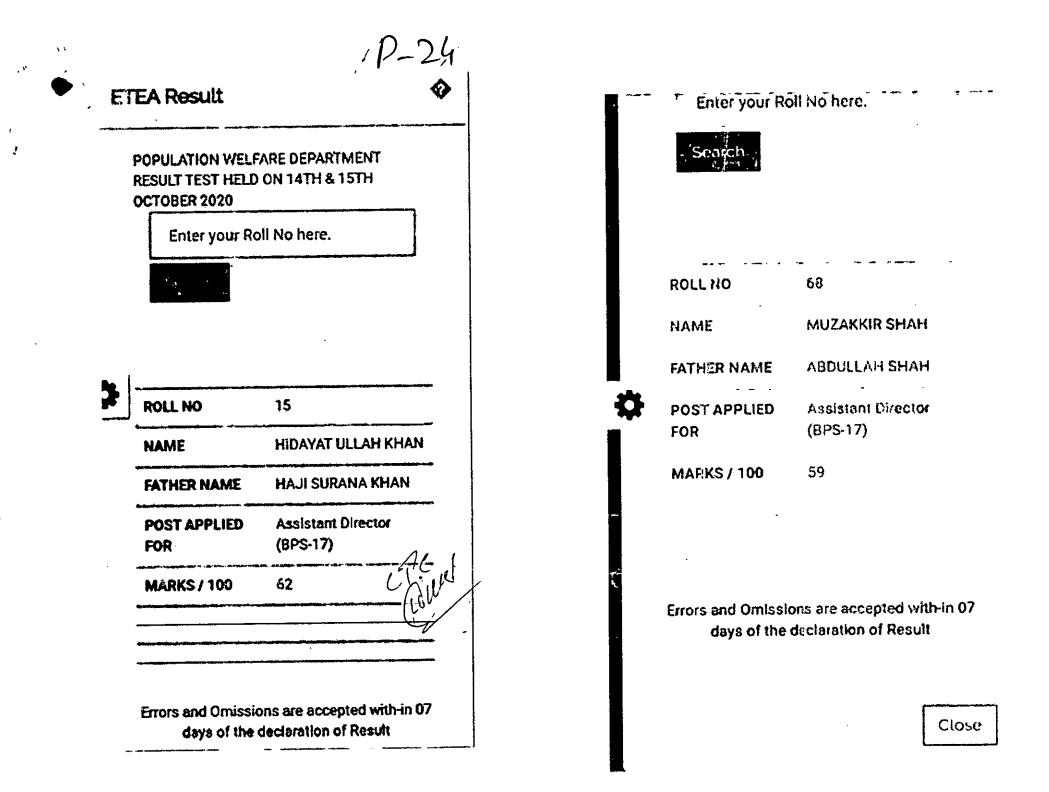
It is certified that Mr. Hidayatullah Khan S/O Haji Surana Khan R/O Zamir Abad Colony DIKhan having CNIC # 12101-0971808-7 has worked in this Department as "Village based Family Planning worker/Male Moblizer" w.e.f 31.05.1998 to 30.06.2014 on fixed pay and yearly contract basis.

At present he is working as Family Welfare Assistant(Male) BPS-07 with effect from 07/02/2018 till date(on regular basis) in this Department.

He is efficient and devoted field worker and bears good moral character,

(paul)

(NIZAM-UD-DIM) District Population Welfare Officer, Dera Ismail Khan District Population Welfate Officer Ed. Maar



Candidates:A Director

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D-2-55

Nell

--trie State -

 The Project Director, (Innovative Scheme)

toth - OS FA)

Population Welfare Department,

Peshawar.

(Grant of a photocopy of Appointment Letter)

With due respect it is stated that I need a photocopy of appointment letter of newly appointed Assistant Director BPS- 17 (Muzakkir Shah s/o Abdullah Shah) in the above mentioned project of Population Welfare Department Peshawar.

Kindly grant me a photocopy of appointment letter of Muzakkir shah s/o Abdullahshah.

and

MNUMBLE POS

Date- 23/10/2021

То

Sub:

Sir,

Thanks

Yours sincerely,

Hidayat Ullah Khan (Marwát)

FWA(M),FWC-Zafarabad,

Population Welfare Department, D.I.Khan.

Cell No-03413624920

Email: hidayatkn6@gmail.com

BAR COUNCIL P_26; AHSAN BILAL Advocate ali antos bc-09-0929 Date of issue; February 2020 February 2023 Valid upto: Malik Ansan Bilal Langia Advocure ingin vour ايک روپي K.P.K -B.C No 09-0929 DK. Service, mbensis [] o tha 1 Celes 1415 7.511 Servico لنعيل دموي بإجرم . بامث فحرياً قله مقدمه مندرجه بالامنوان شرابا بن طرف سے واسط بن وی وجواب دی بمائے بیشی یا تعذیر مقدمہ بنا سے الم راہ ایٹرو کیٹ ہاتی کورٹ I. II. كوحسب ويل شرائط يروكيل مقرركي بب كديش فيشى يرغوذ بالزابذ ربعه محارخاص زوير دعدالت حاضر وديار ودل كارادر جروقت بكارب جاف متد مدد کمل مها دسید مو**صوف کواطلار کا دے کرحاضر عدالت کردان کا ۔اکر تابش یرمنلم حاضر ند اوار دمتد مدیمری غیر حاضری کی وجہ سے کسی طور** میرے خلاف ہو کیا او میا دب موسوف اس کے کی طرح ادمہ دارنہ ہوں کے ۔ نیز وکیل میا دب موسوف میں مقام کہ کری کے علاوہ یا کہ کمری کے ادقات سے بہل یا یہ یہ یا برور تعلیل می وی کرنے کے ذمہ دار نہ وں کے اور مقدمہ مدر کم کی کے علاوہ اور جکہ سامت ور نے یا پرور تعلیل یا وم رئ کے اوقات کے آئے یا یکھے بیش ہونے پر سلم کوکوئی انتسان پن کے لواس کے و مدداریا اس کے واسطے کی معاون کے اداکر نے یا محنت والیس کرنے کے محکم صاحب موسوف ذمہ دارنہ وں کے بھرکوکل ساختہ کہ داختہ صاحب موسوف شک کردہ ذات، خود منظور وقول ادبکا اور صاحب ۲ موروف كومنى دعوى يجاب دع كالم معظامة المراسة المراسة فأكرى أعرافى والحل الحرافى ومرض است مرح بسي مادر مرعاش ياراشى تاسدة فيهله برمان كرف اقبال دموي كالجما النبار دوكالإكر بسوسين داد في تاريخ كاني مقدمه فركوري ون الركيم ري مدري وي مقدمه فركور نظر تأتى . الال المرانى بمآ مدكى مقدمه بالمنسوقى وكرى بكر بل تشكيل تجالج يستلم أشما مى بالتلق بأكرفآرى بل الدفيها اجرائ وكرى مما هب موسوف كوير المحصي وتجرف اعل الجل المان إد كم معالمه و مقدمه المركورة مي ودسر ي وكل الم بمى القتيار بوكه مقدمه بذكوباه ياس بي مى جزوك كاردال لیرتا او با او کی ہراسر ثبر اون اور ویے اختیارات ماسل ہوں کے بیے مما حب موسوف کو بر شركواي بجائع المست المراد مقرد كري ادراي میں روی نہ کریں اورا کی سورت میں بیرا کوئی مطالبہ کی تم کا مها حب موسوف کے برخلاف ند المحال ما حب وموضع مع والقرار المراكد بع فين الأليلادكالت نامد كمدديا بالدستندر 52023 Quar مضمون دکالت مامة بن لیا ہے۔ اورا کیمی طرح سجول کا ہے۔ اور منطور ہے۔ ullah lehan Hidaya Surang lekow James