

27th 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

DFA

27th September, 2022

Learned counsel for the appellant present and heard.

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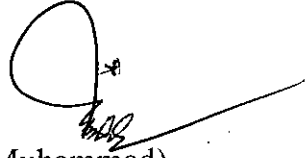
3. *Pronounced in open court in D.I.Khan and given under my hands and seal of the Tribunal this 27th day of September, 2022.*

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

30.06.2022

Nemo for the appellant.

Previous date was changed on ^{the strength of} Reader's 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)
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.


Reader

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.

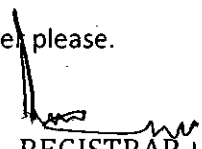




(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7669 /2021

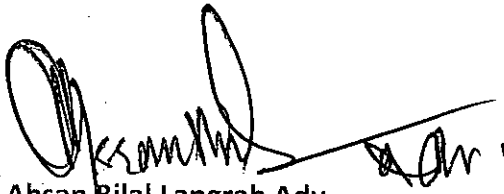
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2021	<p>The appeal of Mr. Hidayat Ullah Khan resubmitted today by Mr. Ahsan Bilal Langrah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at D.I.Khan. Notices be issued to appellant/counsel for preliminary hearing to be put there on <u>13/12/21</u>.</p> <p> CHAIRMAN</p>
15.12.2021		<p>Appellant present in person.</p> <p>He made a request for adjournment as his counsel is not available today; granted. To come up for preliminary arguments on 21.02.2022 before S.B at Camp Court, D.I.Khan.</p> <p> (Rozina Rehman) Member (J) Camp Court, D.I.Khan</p> <p><i>Due to retirement of the Honble Chairman to come up for the same as before on 30/6/2022</i></p> <p></p>
	21/2/2021	

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 appellatant 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.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Note: *Reg's objections removed/fulfilled.*

CHECK LIST OF CIVIL CASE

1.	Plaint		✓
2.	Whether the suit is made over the Court of Senior Civil Judge		✓
3.	Address of parties		
4.	List of Legal Heirs		
5.	Whether this Court has Jurisdiction	a. Pecuniary	
		b. Territorial	
		c. Subject Matter	✓
6.	Whether the Court Fee Affixed		
7.	Documents on which plaintiff relies		
8.	List of Other documents		
9.	Whether the suit is prima facie within time		✓
10.	In case of plaint through recognized agent whether power of attorney is annexed		✓
11.	Whether the Vakalatnama is Annexed		✓
12.	Whether plaint is properly verified		✓
13.	Application for interim relief		✓
14.	Whether defendant can sue legally		✓
15.	In case of suit against Govt. whether copy of notice U/S 80 of C.P.C annexed		✓
16.	In case of suit against Govt. S-79 & Code 27 Rule I C.P.C complied with		
17.	If suit is by alien whether maintainable U/S 83 C.P.C		
18.	If suit is by a foreign state whether maintainable U/S 83 C.P.C		
19.	In case of involving public nuisance whether the provision of S.91 C.P.C are complied with		
20.	In case of suit of the nature of S-92, whether provisions of S-92 are complied with		
21.	In case of representative suit whether provisions of Order I Rule 8 of C.P.C complied with		
22.	In case of minor plaintiff or defendant whether provision of Order-32 C.P.C are complied with		
AFTER INSTITUTION			
1.	Service		
2.	Written Statement		
3.	If set off is claimed, whether Court fee is annexed		
4.	Whether plea of Jurisdiction is taken? if yes, whether decided		
5.	Whether plea mis-joinder and non-joinder of cause of action and parties taken? If yes, whether decided		
6.	Issues framed		
7.	Whether suit can be disposed of on basis of legal issues only		
8.	Whether suit can be disposed of on first hearing		
9.	List of witnesses		
10.	Certificate of readiness under order XVI Rule I		
11.	Plaintiff's evidence		
12.	Defendant's evidence		
13.	Judgment / Decree Sheet		

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

Service Appeal No. 7669/2021

Hidayat Ullah Khan Marwat (Appellant)

VERSUS

Govt. of Khyber Pakhtukhwa and others (Respondents)

SERVICE APPEAL

INDEX

S.No	Particulars of the Documents	Annexure	Page
1.	Grounds of Service Appeal and affidavits	--	1-6
2.	Copies appointment order with relevant record	A	7-9/
3.	Copy of advertisement	B	10-13
4.	Copies of short lists	C	14
5.	Copy of the office order No.I(II)2021-22/Innovative/Recruitment dated 18/06/2021 <i>and reply.</i>	D E	15-17 17
6.	Copies of the departmental appeal and reply.	F	18-19
7.	Copy of the merit list	G	20
8.	Copies of educational qualifications	H	21-25
9.	Wakalatnama <i>→ application for grant of order.</i>	--	26 ^{05-A}

Date: 25/08/2021

Ahmed
Yours Humble Appellant

Hidayat Ullah Khan Marwat

Through Counsel,

Ahmed
Ahsan Bilal Langrah
Advocate High Court
DI Khan

P-11

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 7669/2021

Diary No. 7713

Dated 11-10-2021

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.

..... **Appellant**

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

..... **Respondents.**

Filed to Registrar
11/10/2021

**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 to-day
and filed.

Registrar
11/10/2021

PRAYER

On acceptance of this appeal with the following prayers,

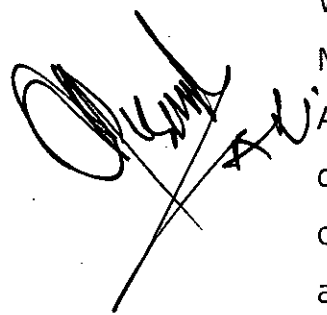
- i. The impugned merit list for the Project Post of Assistant Director Equivalent to BPS-17 under ADP Scheme "Innovative Scheme for Promotion of Population Welfare Programme in favour of the private respondent (Muzakkir Shah) may kindly be set aside.
- ii. The respondents may kindly be directed to consider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

1. 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**.
2. 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 **Annexure-B**.



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 the office 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 **Annexure-E & F**.
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 **Annexure-G**.
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:

*Original
A.C.*

GROUND

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 equallant to the required degree. Degree in Pharmacy and M.Phil in Bio Chemistry which do come under the definition of Social Sciences vide HEC 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 candidate will not be entitled for age relaxation.*

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

[Handwritten signature]
A.D.

[Handwritten signature]

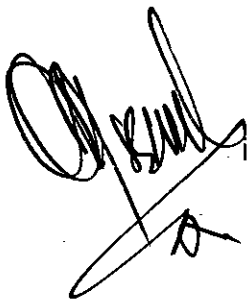
P-55

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,

i. **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.

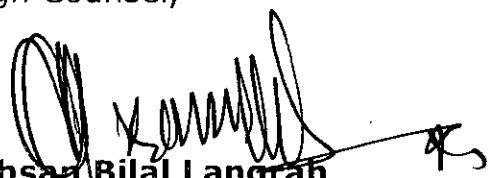
Date: 25/08/2021



Yours Humble Appellant

Hidayat Ullah Khan Marwat

Through Counsel,


Ahsan Bilal Langrah
Advocate High Court

P-6

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

Service Appeal No. _____/2021

Hidayat Ullah Khan Marwat (Appellant)

VERSUS

Govt. of Khyber Pakhtukhwa and others (Respondents)

SERVICE APPEAL

AFFIDAVIT

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



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.

Dated: 25/08/2021



DEPONENT

Through Counsel

ANN-A/P-7



OFFICE OF THE
DISTRICT POPULATION WELFARE OFFICER
DERA ISMAIL KHAN
ZAKORI TOWN, DARABAN ROAD PH#/Fax: 0966-9280208



OFFER OF APPOINTMENT

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 upto two 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

C.P.E.
Pir Zakoori

Mr. Hidayat Ullah s/o Haji Sooran Khan

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.
7. F.No.6 (15)/2016-Admn
8. Personal File.

District Population Welfare Officer,
Dera Ismail Khan

GOVERNMENT OF NWFP
DISTRICT POPULATION WELFARE OFFICE

F.No. 1(1)/98-VFPWS.

P-8 Dated D.K.H. on the 31/5/1998.

Mr. _____

S/o _____

R/o _____

SUBJECT: ENROLMENT AS VILLAGE BASED FAMILY PLANNING WORKER (M-VBFPWS)

Memo: _____

Reference your application and interview dated _____

You are enrolled as Family Planning Worker at Village _____

Union Council _____

Tehsil _____

District _____

under Village Based Family Planning Project.

2. You will be paid a retainer fee @ Rs. 1200/- (Rupees One Thousand and Two Hundred only) per month from the date you join the training. During training period you will be given Rs. 750/- (Rupees Seven Hundred and Fifty only) per month in addition to retainer fee.

3. You will be provided a sign Board to be installed out side your residence.

4. You are employed on contract basis upto _____ which is likely to be extended and can be discontinued earlier if your work is found unsatisfactory.

5. Your main responsibilities are as under:-

- to register eligible couples in your village.
- to visit 10-15 eligible couple every working day and ensure a revisit every 2 months.
- to provide Family Planning Services in the village through regular home visits.
- to refer/motivate clients to nearest service delivery outlet for I.U.D insertion, Contraceptive Surgery and initial dose of injectables.
- to provide treatment for common ailment.
- to assist M.S.U and F.P. Centre staff in arranging I.U.D camps in your village.
- to keep close liaison with influential men in the village including local inhabitants.
- to submit monthly progress report.

If the above conditions are acceptable report for training at District Population Welfare Office Office Situated at Chah Syed Munawar, near Hostel of Govt. Degree College-1 D.I. Khan on _____.

CPC

_____ 31/5
(FACIR JAMIL AHMED)

Copy to the:

1. Director (A&C) /Project Director Population Welfare Deptt; NWFP Peshawar for his kind information with reference to his letter F.No. 2(3)/96-VBFPWS. Dated 13.3.98 please.
2. Divisional Director Population Welfare Deptt; DIKhan Division DIKhan for information please.
3. Assistant District Population Welfare Officer, DIKhan for information with the request to impart the training to the Male F.P. Worker concerned please.
4. Accounts Asstt: local for information and necessary action.
5. District Accounts Officer DIKhan for information and n/action please.
6. Personal File of the (M) F.P. Worker concerned.

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

Siraj

GOVERNMENT OF KHYBER PAKHTUNKHWA					
Office of the Project Director, Innovative Scheme for Promotion of Population Welfare Programme POPULATION WELFARE DEPARTMENT					
Plot # 19, St # 5 Sector E-8 Phase 7 established Peshawar Ph: 091-92190031 E-mail: repw@pwti.gov.pk					
VACANCY ANNOUNCEMENT					
Project Director, Innovative scheme for promotion of Population Welfare Programme for achieving SOGs (PWTI) and Population Policy under ADP Scheme for 2014-2015. To create positions from suitable and eligible candidates for the following project based positions on purely time pay and contractual basis as per prescribed recruitment rules framed under project policy.					
Sr. No	Post & Fixed Pay as per Project Policy	Place of posting	No of Posts	Age Limit	Qualification / Eligibility Criteria
PROJECT IMPLEMENTATION UNIT (PIU)					
1	ASSISTANT DIRECTOR Equivalent (BPS-17) Rs. 80,000/- Per Month	Peshawar	1	30-40	Master's degree in Social Sciences from HEC Recognized University
2	COMPUTER OPERATOR Equivalent (BPS-10) Rs. 50,000/- Per Month	Peshawar	1	25-40	Intermediate in Computer Science (MCS) OR I.T.E.C with one year computer diploma. 25W in English typing & 25 W in Urdu typing
		Sub Total	2		
POPULATION WELFARE TRAINING INSTITUTE (PWTI) PESHAWAR					
1	SENIOR INSTRUCTOR (Tech) Equivalent (BPS-18) Rs. 125,000/- Per Month	Peshawar	1	30-45	M.B.S with MPH from HEC recognized University with 5 years relevant experience
2	SENIOR INSTRUCTOR (Non-Tech) Equivalent (BPS-18) Rs. 125,000/- Per Month	Peshawar	1	30-45	Master's degree in social sciences from HEC recognized University with 5 years relevant experience
3	INSTRUCTOR Equivalent (BPS-17) Rs. 90,000/- Per Month	Peshawar	2	25-40	Master's degree in social sciences from HEC recognized University
4	ADMIN OFFICER Equivalent (BPS-17) Rs. 80,000/- Per Month	Peshawar	1	25-40	Master degree from HEC recognized University with 3 years relevant experience as Admin Officer
5	IT OFFICER Equivalent (BPS-17) Rs. 90,000/- Per Month	Peshawar	1	25-40	1 Master degree in IT from HEC recognized University & 3 years experience in IT Lab as an IT Officer preferably of Education Institute.
6	IT ASSISTANT Equivalent (BPS-10) Rs. 60,000/- Per Month	Peshawar	1	25-40	Bachelor degree in IT from HEC recognized University with 2 years experience in IT Lab of education institute.
7	SENIOR CLERK Equivalent (BPS-14) Rs. 40,000/- Per Month	Peshawar	1	25-40	B.A/B.S from HEC recognized University with 3 years relevant experience. Computer skills upto MS-Office
8	JUNIOR CLERK Equivalent (BPS-11) Rs. 30,000/- Per Month	Peshawar	1	25-40	2nd division HESC from recognized board with 3 years relevant experience 25 wpm in English typing
9	DRIVER Equivalent (BPS-6) Rs. 20,000/- Per Month	Peshawar	1	25-40	Male with valid Driving License with 3 years relevant experience
10	DISPATCH RIDER Equivalent (BPS-6) Rs. 20,000/- Per Month	Peshawar	1	25-40	Male with valid Driving License with 3 years relevant experience
11	NAIB QASID Equivalent (BPS-3) Rs. 15,000/- Per Month	Peshawar	2	25-45	Primary Pass
12	SWEeper Equivalent (BPS-3) Rs. 15,000/- Per Month	Peshawar	1	25-40	Primary Pass
		Sub Total	14		
ADOLESCENT SEXUAL & REPRODUCTIVE HEALTH (ASRH)					
1	Psychologist / Sociologist (Female) Equivalent (BPS-17) Rs. 90,000/- Per Month	Peshawar = 1 D.I. Khan = 1 Swat = 1 Kohat = 1 (Non-transferrable)	4	25-40	Master's Degree in Psychology, Sociology or Social Work from HEC recognized University
2	ASSISTANT (Female) Equivalent (BPS-10) Rs. 60,000/- Per Month	Peshawar = 1 D.I. Khan = 1 Swat = 1 Kohat = 1 (Non-transferrable)	4	25-40	Bachelor's Degree in Psychology, Sociology or Social Work from HEC recognized University

Terms & Conditions are attached.

C.P.C. Qureshi



**OFFICE OF THE PROJECT DIRECTOR
DIRECTORATE GENERAL POPULATION WELFARE
GOVERNMENT OF KHYBER PAKHTUNKHWA**

SITUATION VACANT

Applications are invited from eligible candidates having domicile of Khyber Pakhtunkhwa Merged Areas for the following Project posts purely on fixed pay on contractual basis till expiry of the term "Establishment of 2023 Family Welfare Centres in Khyber Pakhtunkhwa 2020-23" Directorate General of Population Welfare Department, Khyber Pakhtunkhwa. The requisite qualification and experience is shown against each post as under:-

Sl. No.	Post Name	Grade	Age Limit	Qualification
1	Project Director Gy (EP-12)	1	41-50	At least Post Graduate degree in social sciences or MBS with 12 years relevant experience.
2	Assistant Director Gy (EP-11)	1	20-40	Master degree in social sciences from HEC recognized university.
3	Assistant Gy (EP-10)	1	19-30	Second Class Bachelor's Degree from a recognized University and Statistical Economics/Marketing/ Sociology or Commerce as one of the subject and having diploma in Computer/Information Technology from a recognized Institute.
4	Senior Staff Director Gy (EP-9)	2	25-40	Second class Bachelor's Degree from a recognized University. A speed of writing (70) words per minute in Urdu and in English and 45 words per minute in typing and Knowledge of computer in using Microsoft word and Microsoft excel.
5	Staff Officer Gy (EP-14)	1	18-30	(a) Intermediate or equivalent qualification from a recognized Board with diploma/certificate in computer/Information Technology; and (b) Two years job experience.
6	Technical Assistant Gy (EP-13)	1	18-30	Bachelor's Degree in Commerce or Business Administration from a recognized University and Diploma/Certificate in Computer/Information Technology from a recognized Institute.
7	Junior Clerk Gy (EP-04)	1	18-30	Secondary School Certificate from a recognized board is the degree with typing speed 30 words per minute and having certificate in computer/Information Technology.
8	Driver Gy (EP-04)	1	18-30	(1) Middle Pass (2) Driver License (3) Driving License. Preference will be given to the holder of Driving License in Auto Rickshaws.
9	Sub-Driver Gy (EP-03)	1	18-30	Primary Pass.
10	Overseer Gy (EP-05)	1	11-22	17/18th and 19th

TERMS & CONDITIONS

1. General Age relaxation is not admissible as per Project Policy therefore eligible candidates may not apply. 2. The candidates already in government service may apply through proper channel and produce FIC on the date of interview. 3. Age Qualification & Experience will be counted on the date of the advertisement. 4. Applicant is requested to apply for each post in one go and is advised to submit separate applications forms & depositable for each post. 5. In case of foreign degree, awarded certificate from HEC must be provided. 6. Applications are advised to submit their application forms within 20 days from the issue of the advertisement. Applications received after due date will not be entertained. 7. Only direct short listed candidates will be called for screening test after complete availability of application forms. 8. Incomplete applications or application submitted in late date will not be received at any stage of the recruitment process. 9. The competent authority has the right to order or cancel the recruitment process at any stage. 10. Mobile phones, calculators, or any other electronic devices are not permitted in the test centers. 11. Fee is not transferable or refundable. 12. No application will be entertained by hand. 13. Application form and the deposit slip may be downloaded/obtained from the ATS (Printed website: <http://www.ats.gov.pk>). 14. Rs. 400/- will be charged to successful candidates for EP-04 and above and Rs. 200/- for EP-03 and below. 15. Attached Copy of CNIC and two of the back ground passport size photographs must be attached with application form. 16. Form processing fee can be deposited in any HBL & SBI bank's office nearby with branches. 17. Duty fees in application forms along with original deposit slip, should reach within 20 days through any courier service registered post after publication of the advertisement to: Manager Operations Allied Testing Services (ATS), Address: F-10 Street No. 36, Sector F-10/1, Islamabad. For query or help dial 9951-233877-0. 18. Candidates working under government/department will be called as "Contractors of Govt" and will be dropped out from the recruitment process. 19. Candidates will be contacted through SMS by ATS to download and Print their Roll No. Slip from website: www.ats.gov.pk. 20. Candidates are directed not to give personal or mobile number. 21. Test Date, Time & Venue will be mentioned on Roll No. Slip. 22. No separate Call letter will be issued to candidates for screening test through postable or courier. 23. Only short listed candidates in the screening test will be called to submit their original verified documents in 15 days for further verification process on the basis of errors of selection of the Project Policy to recruitment by the Government of Khyber Pakhtunkhwa.

*CTC
Peshawar*

Terms & Conditions

General Age relaxation is not admissible.

Project of
Population welfare Department KPK, Peshawar
(2020-23)
Operating Agency: ATS. Allied Testing Agency.

Date ?

ANN-C/P-14 Short listing by ETEA
for

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

7:22 AM

The post of
Assistant Director

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

7:22 AM

Short listing for
the post of
Instructor

CTC
Amir

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 listing for
the post of
Senior Instructor



ANN-DJE/P-15

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: lspwkp@gmail.com



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

Peshawar, the 18th June 2021

To

The Secretary,
Government of Khyber Pakhtunkhwa,
Population Welfare Department, 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 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 the definition 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 Para 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.

ETC
Doubt

Yours faithfully,

g/c

Syed Imran Shah
Project Director (Innovative Scheme)



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

Peshawar, the 6th August, 2021

To

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**

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.

CTC
Qayyum

(Syed Imran Shah)
Project Director (Innovative Scheme)



GOVERNMENT OF KHYBER PAKHTUNKHWA,
POPULATION WELFARE DEPARTMENT
2nd Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

P-17

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

To

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

Subject: -


**REQUEST FOR INIUSTICE 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.

C.T.K.
Peshawar

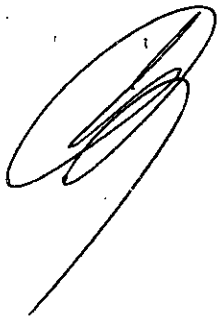
Yours faithfully,


(LAL SAEED KHATTAK)
SECTION OFFICER (ESTT)

Cc to the:-

❖ PS to Secretary, PWD, Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER (ESTT)



Please discuss.
Assistant. 26/7/2021

ANNEX - R / P-18

The Director General,

Population Welfare Department,

KP-Peshawar

Proper Channel (DPWO-D.I.Khan)

Through:

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

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**

C. P. Khan

P-19/17

Sir,

I 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.

Sir,

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

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.

Date-14-6-2021

Yours sincerely

Hidayat Ullah Khan (Marwat)

FWA,FWC-Zafarabad, Population Welfare Department,

D.I.Khan

Cell no-03413624929

Email-hidayatkn6@gmail.com.

C.T.C
Marwat

Hidayat

Total No of Post = 1

ANX-C/P-20-20

**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"**

Merit Order No.	Personal Detail			Prescribed Educational Marks					Experience	Sub Total	Total Interview Marks	Grand Total	Remarks
	NAME	FATHER NAME	D.O.B	MA/MSc	BA/BSc	FA/FSc	SSC	Higher Qualification					
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	SAJJAD AHMED	MAJEED GUL LATE	01-Apr-85	15	11	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	5.50	76.50	

Handwritten signature

Serial No. GU 000862

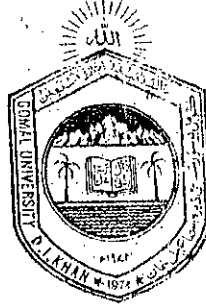
Registered No. 412-PHARM

جامعة گومال

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(NEW) PAKISTAN
KHYBER PAKHTUNKHWA



Checked & Found Correct
in the Examination Record

VERIFIED

Controller of Examinations
Gomal University, D.I. Khan
Khyber Pakhtun Khwa, Pakistan

This is to Certify

That HIDAYAT ULLAH KHAN

Son/Daughter SURAYA KHAN

of the BIOLOGICAL SCIENCES DEPARTMENT

has obtained the Degree of

MASTER OF PHILOSOPHY

(IN BIOCHEMISTRY)

in this University at the Examination held

in 2014

C. T. P. P. Khan

Roll No.

Result declared on FEBRUARY 16, 2018

Countersigned

[Signature]
Controller of Examinations

[Signature]
Vice-Chancellor

[Signature]
Drawing & Disbursing Officer
District Population Welfare Office
Dera Ismail Khan

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



(Session 1990-94)

FIDAYAT ULLAH KHAN SON of SURANA KHAN and

a student of the Department of Pharmacy, Gomal University
having passed the prescribed examination in NOV/DECEMBER, 19 93,

is this day admitted by the Gomal University to the DEGREE of

BACHELOR OF PHARMACY

HE obtained 2124 marks out of 3600

The Examination was taken as a whole/ in parts.

[Signature]
LECTURER

[Signature]

Registered No. 412-PHARM-90

Roll No. 1583

FEBRUARY 10, 19 99

Countersigned

[Signature]
Controller of Examinations

[Signature]
Vice-Chancellor



GOVERNMENT OF KHYBERPAKHTUNKWA

OFFICE OF THE

DISTRICT POPULATION WELFARE OFFICER

DERA ISMAIL KHAN

ZAKORI TOWN DARABAN ROAD

PH/FAX 0966-933208

P-235

Email: dpwo-dik@gmail.com



Facebook: www.facebook.com/DpwoDIKhan



Twitter: www.twitter.com/DpwoDIKhan

F.No. 12(13)/2016/Admn/ (60)

Dated DIKhan the 03/11/2020

TO WHOME IT MAY CONCERN

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 Mobilizer" 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.

ETC
Adigles

(NIZAM-UD-DIN)

District Population Welfare Officer,
Dera Ismail Khan

District Population Welfare Officer
D.I. Khan

E TEA Result

P-24

POPULATION WELFARE DEPARTMENT
RESULT TEST HELD ON 14TH & 15TH
OCTOBER 2020

Enter your Roll No here.



ROLL NO	15
NAME	HIDAYAT ULLAH KHAN
FATHER NAME	HAJI SURANA KHAN
POST APPLIED FOR	Assistant Director (BPS-17)
MARKS / 100	62

Handwritten signature

Errors and Omissions are accepted with-in 07
days of the declaration of Result

Enter your Roll No here.

Search

ROLL NO	68
NAME	MUZAKKIR SHAH
FATHER NAME	ABDULLAH SHAH
POST APPLIED FOR	Assistant Director (BPS-17)
MARKS / 100	59

Errors and Omissions are accepted with-in 07
days of the declaration of Result

Close

AM / 05 FA

To

The Project Director, (Innovative Scheme)
Population Welfare Department,
Peshawar.

Sub: (Grant of a photocopy of Appointment Letter)

Sir,

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.

Thanks

Date- 23/10/2021

Handwritten signature

Handwritten signature

Yours sincerely,

Hidayat Ullah Khan (Marwat)

FWA(M),FWC-Zafarabad,-

Population Welfare Department,D.I.Khan.

Cell No-03413624920

Email: hidayatkn6@gmail.com

Handwritten signature
Request for Appointment

Assistant Director BPS- 17 (Muzakkir Shah s/o Abdullah Shah) in the above mentioned project of Population Welfare Department Peshawar.

