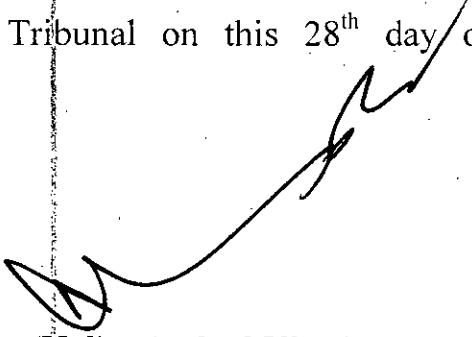



ORDER

28th Nov, 2022

1. Mr. Maqsood Ali, Advocate, learned counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General alongwith Mr. Ali Rehman, SI (Legal) for respondents present.
2. Vide our detailed order of today placed in service appeal No. 12077/2020 titled "Nisar Ahmad Khan-vs- Inspector General of Police/Provincial Police Officer, Khyber Pakhtunkhwa, Central Police Office, Peshawar and others" (copy placed in this file), this appeal is also disposed of. Costs shall follow the events. Consign.
3. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 28th day of November, 2022.


(Kalim Arshad Khan)
Chairman


(Fareeha Paul)
Member(Executive)

24.08.2022

Learned counsel for the appellant present. Mr. Ali Rehman, Inspector (Legal) alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents No. 1 to 3 present. Syed Noman Ali Bukhari, Advocate, for private respondent No. 4 to 6 present.

Learned Assistant Advocate General as well as learned counsel for private respondents No. 4 to 6 sought time for submission of reply/comments. Last opportunity is granted to the respondents with the direction to submit reply/comments on or before the next date positively, failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for arguments on 31.10.2022 before the D.B.



(Rozina Rehman)
Member (Judicial)




(Salah-Ud-Din)
Member (Judicial)

31st Oct., 2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

There is no body present on behalf of the respondents. On the previous date, the official as well as private respondents were given last opportunity with the direction to submit reply/comments on or before the next date positively failing which their right for submission of reply/comments was to be deemed as struck off. Respondents have not submitted reply/comments, therefore, their right to submit reply/comments stands struck off by virtue of the previous order. To come up for arguments on 28.11.2022 before the D.B.



(Fareeha Paul)
Member (E)

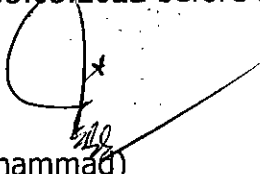


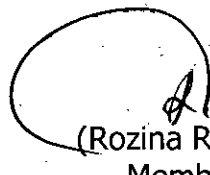
(Kalim Arshad Khan)
Chairman

10.11.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Syed Noman Ali Bukhari, Advocate present and submitted Wakalatnama on behalf of private respondents 4,5 and 6 which is placed on file and seeks adjournment as he is freshly engaged. Adjourned. To come up for arguments on 03.03.2022 before D.B.


(Mian Muhammad)
Member(E)


(Rozina Rehman)
Member(J)

03.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 07.06.2022 for the same as before.


Reader.

07.06.2022

Proper D.B is on tour to Camp Court, Swat, therefore, case is adjourned to 24.08.2022 for the same as before.


Reader

10.02.2021

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 07.05.2021 before S.B.

Amount Deposited
Security & Process Fee


(Rozina Rehman)
Member (J)

07.05.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 23.06.2021 for the same as before.


Reader

23.06.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Respondents have not submitted reply/comments. Learned AAG requests for time to contact the respondents submit reply/comments. Learned AAG is required to contact the respondents for submission of reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 10.11.2021 before the D.B.



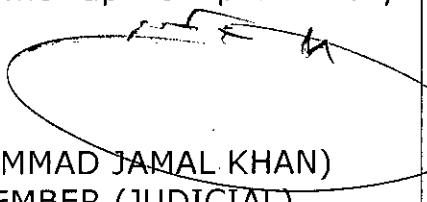

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 12081 /2020

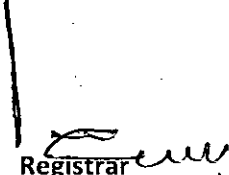
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/10/2020	<p>The appeal of Mr. Tuaeheed Khan resubmitted today by Mr. Maqsood Ali Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	23.11.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/11/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Neither appellant nor anyone else representing him has appeared despite having been called time and again, therefore, appellant as well as his respective counsel be noticed for 10.02.2021. File to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)</p>

The present appeal was returned to the counsel for the appellant for completion and resubmission within 15 days. Today i.e. on 22.9.2020 he has resubmitted the same without removing the objection which is returned again to the counsel for the appellant for removing the following deficiencies and resubmit the same within 15 days.

- 1- Page Nos. 49, 50 and 51 of the appeal are illegible which may be replaced by legible/better one.
- 2- In the memo of appeal places have been left blank which may be filled up.
- 3- Departmental appeal having no date be dated.

No. 2789/S.T.,

DT. 25/9/2020


Registrar
Service Tribunal
Khyber Pakhtunkhwa
Peshawar.

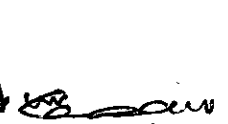
Mr. Magsood Ali Adv. Pesh.

Above mentioned objections have been removed and resubmitted before this service tribunal.

The objections No. 2 & 3 still stand.
The appeal is again returned to the counsel for the appellant for completion and re-submission within 10 days.

No: 2888/ST

Date: 09/10/2020


9/10/2021

Objection No:-1 Is removed we have filed better copies of the mentioned latter

Objection No:-2 stated that the impugned notification the authority did not mention office order No so the very reason we have also did not file the same.

Objection No:-3 the appellant have explain the reason and got the knowledge of the impugned notification and after that appellant file representation against the mentioned order.

All the objections are duly removed as per availability and capability


M. ali

Appellant has impugned two separate orders against different cause of action. Therefore, the appeal is returned to the counsel for the appellant with the observations that the appellant is required to file two separate service appeals against each order under the law and also to remove the following deficiencies.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copies of departmental appeal against the impugned revised seniority list dated 30.04.2020 and its rejection order are not attached with the appeal which may be placed on it.
- 3- Copies of departmental appeal against the impugned promotion order dated 22/05/2020 and its rejection order are not attached with the appeal which may be placed on it.
- 4- Annexures of the appeal may be attested.
- 5- Annexures of the appeal may be flagged.
- 6- Eight more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1167 /S.T,

Dt. 02-06 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Maqsood Ali Adv. Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

In Re: Service Appeal No. _____/2020

Tauheed Khan s/o Abdul Hameed Khan

..... *Appellant*

Versus

Inspector General of Police / Provincial Police Officer & Others

..... *Respondents*

INDEX		
S. No.	Description	Pages
1.	Appeal along with Affidavit	1-20
2.	Interim Relief Application along with Affidavit	21-23
3.	Application for Condonation of Delay, If Any	23A-23C
4.	<u>Annexes:</u>	
I.	Chronological Index of Appointment of the Aggrieved Officers	24
II.	Copy of the Seniority List "F" dated 19.03.2019	25-32
III.	Copy of the Notification No. 11644-68/E dated 30.10.2019 of Revised List "E" of Malakand Range	33-35
IV.	Copy of the Respondent-1 Impugned Notification dated 12.02.2020 Revising Seniority List "F"	36-37
V.	Copy of the Specimen Representation / Appeal	38-42
VI.	Copy of the Impugned Committee Report No. 4844/EP dated 04.04.2020	43-48
VII.	Copy of the Impugned Order No. 97 dated 15.04.2020	49
VIII.	Copy of the Impugned Order No. 98 dated 15.04.2020	50
IX.	Copy of the Respondent-3 Withdrawal Notification	51
X.	Copy of the Impugned Revised Seniority List Notification No. 840/SE-I dated 30.04.2020	52-58
XI.	Copy of Representation / Departmental Appeal against order dated 30.04.2020	58A-58F
5.	Wakalatnama	59


Isaac Ali Qazi

Advocate Supreme Court

Isaac Law Associates

Advocates & Consultants

12, K-3, Phase-III, Hayatabad, Peshawar

Phone 5817132, 5818446, Mobile: 0300 8594555

Email: isaac.ali.qazi@gmail.com

www.isaaclaw.org

①

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

In Re: Service Appeal No. 12081 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4174

Dated 01-6-2020

Tauheed Khan s/o Abdul Hameed Khan
DSP (Acting SP, Special Branch) Khyber Pakhtunkhwa

..... Appellant

Versus

- 1. Inspector General of Police / Provincial Police Officer**
Khyber Pakhtunkhwa, Central Police Office, Peshawar
- 2. Additional Inspector General of Police (HQs)**
Khyber Pakhtunkhwa, Central Police Office, Peshawar
- 3. Regional Police Officer / DIG**
Malakand Region, Malakand
- 4. Riaz Ahmad**
DSP (C.M Secretariat), Peshawar
- 5. Bakht Zada**
DSP (Acting SP Operation), Swat, Malakand Region, Malakand
- 6. Ajmad Ali**
DSP (Acting SP / CSO to C.M), Peshawar

..... Respondents

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against Rejection of Departmental Appeal/Representation filed against Provisional Seniority List No. 60/E-2/Notification PPO Peshawar vide Impugned Orders No. 97 & 98 both dated 15.04.2020 read with Impugned Committee Report No. 4844/EP dated 04.04.2020 resulted into Impugned Revised Seniority List notified vide Notification No. 840/SE-I dated 30.04.2020. The Whole proceedings culminated into out of turn promotion of Respondents-5 & 6 through Impugned Notification No. SOE-I (E&AD) 2-4/2020 dated 22.05.2020.

Filed to-day

Registrar
1/6/2020

Re-submitted to
and filed.

Registrar
15/10/20

①

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

In Re: Service Appeal No. _____/2020

Tauheed Khan s/o Abdul Hameed Khan
DSP (Acting SP Special Branch) Khyber Pakhtunkhwa

..... *Appellant*

Versus

1. **Inspector General of Police / Provincial Police Officer**
Khyber Pakhtunkhwa, Central Police Office, Peshawar
2. **Additional Inspector General of Police (HQs)**
Khyber Pakhtunkhwa, Central Police Office, Peshawar
3. **Regional Police Officer / DIG**
Malakand Region, Malakand
4. **Riaz Ahmad**
DSP (C.M Secretariat), Peshawar
5. **Bakht Zada**
DSP (Acting SP Operation), Swat, Malakand Region, Malakand
6. **Ajmad Ali**
DSP (Acting SP / CSO to C.M), Peshawar

..... *Respondents*

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against Rejection of Departmental Appeal/Representation filed against Provisional Seniority List No. 60/E-2/Notification PPO Peshawar vide Impugned Orders No. 97 & 98 both dated 15.04.2020 read with Impugned Committee Report No. 4844/EP dated 04.04.2020 resulted into Impugned Revised Seniority List notified vide Notification No. 840/SE-I dated 30.04.2020. Seniority List "F" vide Notification No. 347/SE-1 dated 19.03.2019 May Kindly Be Restored In Its Original Form And Any Other Order (Promotions) Which Is Done Under The Grab Of Notification No. 840/SE-I Dated 30.04.2020 May Kindly Be Declared As Null And Void.

Respectfully Sheweth,

②

The Appellant humbly submits as under:

1. That Appellant is a Police Officer of the rank of Deputy Superintendent of Police, PBS-17, performing his duties in the Province of Khyber Pakhtunkhwa. The Appellant is inducted in Police Service through Khyber Pakhtunkhwa Public Service Commission after due process as Assistant Sub-Inspector in the Year 1983.

Chronological Index of Appointment of the Aggrieved Officers at Annexure-I

2. That throughout his service, the Appellant has performed his duties with all due diligence and dedication. Appellant besides serving the nation with gallantry and sacrifices have also continuously been harnessing his skills and knowledge by rigorous training and refreshing courses to keep themselves abreast with modern techniques of policing, thus, have been earning his promotion on the basis of principle of “**seniority-cum-fitness**” as laid down in the Police Rules 1934.

3. That **Appellant is constrained to file the instant Appeal for being aggrieved** of Rejection of Departmental Appeal/Representation *vide* Impugned Orders No. 97 & 98 both dated 15.04.2020 read with Impugned Committee Report No. 4844/EP dated 04.04.2020 resulted into Impugned Revised Seniority List notified *vide* Notification No. 840/SE-I dated 30.04.2020 of the Respondents-4 to 7 whereby in violation of the principle of seniority-cum-fitness his seniority / promotion are being disturbed affected with retrospective effect that is too most humbly submitted were prompted for some ulterior reasons, including nepotism, favouritism and political

interference which have if have gone unchecked may have disastrous impact over the entire Police Service of the Province of KP, hence, this Appeal.

3.1. That Respondents-4, 5 & 6 have been arrayed as Respondents who are beneficiary of the impugned orders as now by Notification No.SOE-I (E&AD) 2-4/2020 dated 22.05.2020, Respondents-5 & 6 given the benefit of the aforesaid maneuvering promoted to Grade-18 as Superintendent of Police.

4. That before laying down the specific facts, it would be pertinent to take an **OVER VIEW** of the law relevant to the structure of the Police Service which in the subcontinent was rooted out from "The Police Act 1861". Later on it was supplemented with "The Police Rules 1934" wherein almost all aspects of the Police service were delineated. For its time tested comprehensivity, these Rules have now been perceived as Bible of the Police Service. The Police Act 1861 was superseded by Police Order 2002, however, Section 185 of it granted saving to the Police Rules 1934. The Police Order 2002 has now been repealed to the extent of the Province of Khyber Pakhtunkhwa by enactment, namely: "Khyber Pakhtunkhwa Police Act, 2017", however, its section 141(2) *ibid*, specifically provided that **"Police rules made under the Police Act 1861 shall continue to remain in force until altered, repealed or amended by the appropriate Authority"**.

Note: Police Act 1861 still in force in Islamabad Capital Territory by virtue of section 1(3) of Police Order 2002. Whereas by virtue section 141(2) of KP Police Act 2017 "all provisions of Police Order 2002 relating to Federal Legislative Field shall continue to remain in force".

5. That Police Rules 1934 covers almost all aspect of the Police Service. Relevant to the issue, it is submitted that Chapter 12 of the Police Rules pertains to the appointment / seniority of police officers, whereas Chapter 13 *ibid* deals with his promotion and preparation and maintenance of promotions

lists etc. According to police rules as well as some rulings of Supreme Courts, [i] **Seniority** and [ii] **Promotion Lists** are two different things. It is important to mention that seniority lists are maintained according to the principles laid down in Rule 12.2 of the Police Rules, while promotion lists are maintained in accordance with the provision of Chapter 13 *ibid*. In the context of this case entry and seniority of officers in both the lists is needed to be further elaborated:

5.1. **Seniority Lists:** That Police Rules 12.1(2) provides that all direct appointments to non-gazetted ranks above that of constable shall be made by appointing authority on consideration of the recommendation of the selection board, provided that direct appointment of Assistant Sub-Inspector and above shall be made by the appointing authority on the recommendation of Public Service Commission.

5.1.1. That according Rule 12.1(3) *ibid* the power to confirm the appointment to the officers appointed on probation vests in the prescribed appointing authority. Appointing authorities have been defined in Police Rules 12.1 *ibid*.

5.1.2. That sub-rule 4 of Police Rules 12.1 *ibid* further provides the inspector shall be borne on a provincial roll and shall receive provincial constabulary numbers. Sub Inspector (SI) and Assistant Sub Inspector (ASI) shall be borne on range rolls and shall receive

5

range constabulary numbers. Rule 12.8 *ibid* provides that inspectors, Sub inspectors and ASIs who are directly appointed will be considered to be on probation for three years.

5.2. **Fixation of Seniority of Officers:** Police Rules 12.2(3) *ibid* provides that all appointments of the enrolled Police Officers are on the probation according to the rules in Chapter 12 applicable to each rank.

5.2.1. That seniority in the case of upper subordinates, will be reckoned in the first instance from the date of first appointment, officers promoted from the lower rank will be considered senior to the persons appointed direct on the same date, and the seniority of the officers appointed direct on the same date will be reckoned according to the age. Seniority shall, however, be finally settled by the dates of confirmation. **The seniority inter-se of several officers confirmed on the same date being that allotted to them on first appointment.** Provided that any officers whose promotion or confirmation is delayed for his being on deputation outside his range or district shall, on being promoted or confirmed regular the seniority which he originally held vis-à-vis any officers promoted or confirmed before him during his deputation.

5.2.2. That rules governing probation and seniority of Deputy Superintendent of Police are contained in Appendix 12.1 all directly appointed officer shall be on probation for a period of two years.

5.3. **Promotion Lists**: that promotion from one rank to another and maintenance of promotion lists are governed by Chapter 13 of the Police Rules.

5.3.1. That under Police Rules, promotion lists are separately maintained from the seniority list such as A, A1, B1, C, D, E and F. The confirmed officers from the seniority list are picked up for the promotion at district, divisional and provincial level to the next higher rank making a pyramid to filter officers for promotion to the next rank on the basis of seniority-cum-fitness. The leftover are constrained to improve his performance and compete for promotion to achieve the goal of "seniority cum fitness", as a pre-requisite for promotion as envisaged by Rules 13.1 *ibid*.

5.3.2. That according to the Rules 13.1 *ibid* promotion from one rank to another shall be made by selection tempered by seniority. Efficiency and honesty be the main factors governing selection, specific qualification, whether in the nature of training, courses passed or practical experience shall be carefully considered in each case. When qualification of two officers or otherwise

①

equal, the senior shall be promoted under sub-rule 3 of the Rule 13.1 *ibid*, for the purposes of regulation promotion amongst enrolled Police Officers, six promotion lists A, B, C, D, E and F are maintained.

5.3.3. That A, B, C and D lists pertains to the officers from the rank of constable up to the rank of Head Constables, which shall be maintained in each District, whereas list "E" pertains to the rank of ASI which shall be maintained in the office of Deputy Inspector General of Police and will regulate promotions of the officers to the rank of Sub Inspector. Similarly list "F" shall be maintained in the office of Inspector General of Police and will regulate promotion to the rank of Inspector.

5.3.4. That promotions lists shall be maintained according to the Proforma provided *vide* Form No. 13.15(2).

5.3.5. That Rule 13.15 *ibid* relates to the promotion list "F" which provides that recommendation in respect of Sub Inspector considered fit for promotion to the DIG by SP in Form 13.15(1) and the DIG shall finally submit recommendation to the Inspector General of Police as soon as they are satisfied as to the fitness of officers recommended, but not later than October every year.

5.3.6. That Sub-Rule (2) *ibid* provides that such of the officers recommended, as the IGP may consider suitable shall be admitted to promotion list "F" which will, however, not be published. All instructions/procedure for recommendation and admission to list "F" is contained in Rule 13.15 which is self-explanatory.

5.3.7. That it is also pertinent to mention here that as per Rule 13.15(4) *ibid* seniority in list "F" will be in accordance with the date of entry in that list.

6. That Rule 13.18 *ibid* regulates **PROBATIONARY PERIOD** of promotion which provides that all Police officers promoted in rank shall be **on probation for two years** and on conclusion of the probationary (officiating) period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether the officer should be confirmed or reverted.

6.1. That from the rules quoted above, it is very much clear that seniority lists and promotion lists are two separate things which cannot be amalgamated with each as is presently done in the CPO because at present Promotion List "F" is considered as a seniority list which is wrong and against the rules. The Supreme Court has also held so in its various Judgments like Azmat Ghafoor case etc.

6.2. That for all directly appointed officer three years probationary period is provided (Police Rule 12.8) while for all other officers promoted from one rank to another, two years' probation period is provided in Rule 13.18 *ibid*. After completion of probation period the officers have to be confirmed, which means that confirmation for officer promotion has to be made in each rank and confirmation dates of the officer shall vary from rank to rank. As envisage in Rule 12.2(3) *ibid* that seniority in case of upper subordinate will be reckoned in the first instance from the date of first appointment, officer promoted from lower rank will be considered senior to the persons appointed directly on the same date, while seniority shall finally be settled by dates of confirmation.

7. That in consideration of all the prevalent provisions Seniority List "F" was prepared and published by the competent authority *vide* Notification No. 347/SE-1 dated 19.03.2019 fixing seniority amongst all Inspectors, DSPs (BPS-17) of the Province of Khyber Pakhtunkhwa for promotion to the next rank to SP (BPS-18).

Copy of the Seniority List "F" dated 19.03.2019 at Annexure-II

Cause of Action of the Instant Appeal:

8. That grievance of the Appellant is that for some extrinsic reasons and intervention, the Regional Police Officer, Malakand (Respondent-3) through Notification No. 11644-68/E dated 30.10.2019 revised promotion list "E" of the officer of Malakand Range that is too with retrospective effect confirming

his promotion as sub-inspector as back as to 01.04.1986 has the effect of disturbing decades old seniority positions in the promotion List "F" for inspectors and Promotion List of DSPs maintained at Provincial Level.

Copy of the Notification No. 11644-68/E dated 30.10.2019 of Revised List "E" of Malakand Range at Annexure-III

9. That as a consequence Respondent-3 (RPO Malakand) Notification dated 30.10.2019, Respondent-1 *vide* impugned Notification No. CPO/E-II/Revised Seniority/61 dated 12.02.2020 also correspondingly revised the promotion "List F" of DSP maintained at Provincial level without any due process.

Copy of the Respondent-1 Impugned Notification dated 12.02.2020 Revising Seniority List "F" at Annexure-IV

10. That aforesaid development has obviously affected the spirit of many senior officers, like Appellant, as by one stroke of pen, he have been deprived them from his decades old seniority which they, humbly submitted, have earned not as favour but through dint of his hard work and merit, hence, through proper channel, the Appellant has filed his departmental appeal / representations to the Respondent-1 wherein attention was invited to pertinent provisions of Police Rules 1934 and ruling of the supreme court wherein promotion in police service only and only was provided and directed to be taken on the basis of "Seniority-cum-Fitness" which with all mandate of were altogether ignored altogether.

° Copy of the Specimen Representation / Appeal at Annexure-V

6

11. That to attend the grievance of the Appellant, the Respondent-1 constituted a Committee *vide* Order dated 10.03.2020 under the Chairmanship of Commandant Elite Force KP having other three members Commandant FRP, AIG Establishment and AIG Legal CPO. The Committee invited the Respondents-4, 5 & 6 in person as beneficiary officers of the aforesaid pick and choose policy and few of the Appellant was also asked to attend the Committee. Through covering letter No. 4844 dated 04.04.2020, the Committee submitted his Report and Recommendation to Respondents-1 & 2 whereby not only against the law and facts approved that impugned revision of seniority of Respondents-4, 5 & 6 but also made recommendation to consider his cases specially for promotion expeditiously on the basis of impugned revised Lists E & F. For the sake of ready reference the recommendations of the Committee are reproduced as under:

- I. The instant petitioners to the extent of seeking seniority against the officers at serial no. 1, 2 7 3 be filed requiring no further action.*
- II. The case of S.O 11/87 beneficiaries needs to be sent back to the RPO MKD for assigning them their rightful place in seniority list alongside their respective batches.*
- III. The plea of the petitioners vis a vis the remaining affectees needs to be reviewed and looked into the relevant provisions of law broadly incorporated in this report.*
- IV. Immediate, substantial and cogent measures may be taken for convening meeting of the Departmental Selection Board to consider the promotion cases particularly of those officers who were given relief by the competent legal forums as well as by the Department as some are on the verge of retirement.*
- V. The cases of all those officers may also be looked into by Range DIGs who were ignored or omitted from confirmation at the right and appropriate*

timing on account of red tape, technicalities and bureaucratic checks leading to deprivation of their lawful right. The broad principles set out in the report may be considered for deciding all such cases.

VI. Notices to all the officers who may likely to be affected by this report should be notified and sufficient opportunities given to represent themselves in accordance with law."

Copy of the Impugned Committee Report No. 4844/EP dated 04.04.2020 at Annexure-VI

12. That Respondents-1 & 2 directed Respondent-3 and other Ranges through impugned letter/orders No. 97 & 98 both dated 15.04.2020 to implement the recommendation of the Committee, so as the Seniority Lists E & F be accordingly revised.

Copy of the Impugned Order No. 97 dated 15.04.2020 at Annexure-VII

Copy of the Impugned Order No. 98 dated 15.04.2020 at Annexure-VIII

13. That finally cat came out of the bag as Respondent-3 in light of the impugned recommendation of the Committee, its earlier Notification No. 11644-68/E dated 30.10.2019 was withdrawn by another Notification No. _____ dated _____, however, Respondents-4, 5 & 6 positions were retained as "untouchable". For the above, it was beyond shadow of doubt that entire exercise was meant to promote Respondents-4, 5 & 6 by hook ad crook to the next senior level even alter of the entire police service structure in the Province. Now Respondent-1 *vide* impugned Notification No. 840/SE-I dated 30.04.2020 has revised the seniority list. Thereafter, the Appellant filed departmental appeal against the impugned order dated 30.04.2020, and the said departmental appeal are yet to be decided by the Competent Authority.

Copy of the Respondent-3 Withdrawal Notification at Annexure-IX

Copy of Impugned Revised Seniority List Notification No. 840/SE-I dated 30.04.2020 at Annexure-X

13

Copy of Representation / Departmental Appeal against order dated 30.04.2020 at Annexure-XI

14. That it is humbly submitted that whole edifice of the Police, a discipline force, is erected on the principle of seniority-cum-fitness which provide drive to the officers to perform his duties throughout his career with great zeal and gallantry, competing with each other showing his proficiency and efficiency earned his promotions, thus, the best of the lot getting higher on the pyramid. Following motto of the Police, the Appellant has timely promoted solely on the basis of his seniority-cum-fitness which now they are happened to be losing at the hand of selfish nepotism and favouritism.

15. That impugned order(s) dated 15.04.2020 of the Respondents though not directly served or notified to the Appellant, however, came in the knowledge of the Appellant on 25.05.2020 whereafter the impugned order(s) dated 15.04.2020 culminated into illegal promotion of Respondents-5 & 6 through impugned revised seniority list notified *vide* Notification No. 840/SE-I dated 30.04.2020, while about the mentioned notification the Appellant has got knowledge on 25.05.2020 when he visited the CPO Peshawar in some other official matter, therefore, limitation for Appeal u/s 4 *ibid* commenced from date of knowledge rather issuance of Notification dated 25.05.2020, hence, the instant Appeal may please be treated within time.

16. That being aggrieved of the aforesaid impugned orders, Appellant prefers this Appeal, *inter alia*, on the following:

Grounds:

- I. That impugned orders are erred both in law and facts, hence, not sustainable in the eyes of law.
- II. That the impugned Orders / Committee Report / Revised Seniority List are highly misconceived not only against the law and facts but also for some compelling reasons not get promoted because of

his own short coming designed to extend the benefit to few individuals that is too at the alter of suppressing efficiency and competency in the Police Service.

III. That impugned Orders / Notification / Recommendation are not only against law and justice but also attracts principle of estoppel and hit limitation, hence, not sustainable.

IV. That entire exercise of re-fixing the seniority was **discriminatory** as through pick and choose, Respondents-4, 5 & 6 who have missed the bus through his share inefficiency and competency lagged behind the Appellant, hence, the entire exercise come within mischief of Articles 14 & 25 of the Constitution.

V. That impugned exercise altering the seniority is also hit by Article 27 of the Constitution as officers belonged to Malakand range have been given preference over the others area such as Appellant.

VI. That **WIHTOUT PREJUDICE** to the merit, impugned recommendation of promotion of Respondents-4, 5 & 6 *per se* and specially directly acting thereupon without the constitution and proceedings of Departmental Promotion Committee (DPC) is illegal, thus, such recommendations are liable to be set aside.

VII. That now disturbing seniority which established decades ago at this belated stage definitely should

have adverse effect the morale of the Appellant which situation is a very dangerous intrigue for the disciplined force like Police, hence, under the circumstances interference of this Honourable Court is the requirement of law and justice.

VIII. That the impugned Committee Report humbly submitted for some compelling reasons is *mala fide* as for attribution of late confirmation and promotion of the three Respondents (beneficiary officers) merely to red-tapism etc. is absolutely against the fact as on record, it was not red-tapism rather it was their laxity and for their failure to complete the pre-requisites for confirmation of their promotions within the probation period of two years.

IX. That it is humbly submitted that the probation period of two years is based on the requisite optimum ability, competency and capacity to fulfill the prerequisite within the specified period of two years of probation otherwise it has been seen that some of the officers, like the Respondents-4, 5 & 6 took years after year to qualify and complete the requisite courses and training in various fields and discipline to improve the cognitive skills, testing and posting in various branches. Overall performance evaluation, records is mandatory for confirmation under the Police Rules 1934 unlike of the other provisional departments of the civil administration where mainly the length of the service is counted.

- X. That to demonstrate, how the impugned exercise affected the seniority and spirits of the Appellant (DSPs of the Khyber Pakhtunkhwa Police) can best be illustrated by the following table:

S#	Name	RANK	RECOMMENDATION OF COMMITTEE	PREVIOUS POSITION	NEW POSITION
1	Mr. Riaz Ahmed	DSP	Above the name of Mr. Arif Javed	29	1
2	Mr. Bakht Zada	DSP	Below the name of Mr. Riaz Ahmed & Above the name of Mr. Arif Ahmed	30	2
3	Mr. Amjad Ali	DSP	Below the name of Mr. Bakht zada and above Mr. Arif Javed	62	3

- XI. That under the rules, seniority of the officer shall be finally settled by dates of confirmation in each rank and to assign seniority in the rank of DSP from the date of first appointment as ASI is totally against the rules. In each rank date of promotion and confirmation shall be considered for assigning seniority to them. By giving seniority to a DSP from the date of appointment as ASI would amount to bypass all the above mentioned rules which regulate promotion/appointment. Police Officer cannot be treated as like any other civil servant, as Special Rules other than General Service Rules applicable to the Civil Servants has been framed, under which Police Officers cannot be treated at par with the Civil Servant. General Rules of Civil servant can only be applied on Police Officer when there is no such provision in Police Rules in respect of any issue/point. The Supreme Court of Pakistan in its Judgment reported in PLD 1985 SC 159, has elaborated in detail this aspect of Police Service as well as normal Civil Service.

①

XII. That here it is worth to mention that previously in 2013 similar attempt was made to fix the seniority for promotion on the basis date of appointment rather than on the basis of seniority-cum-fitness. Such attempt was thwarted by presentation of the relevant police officer and finally committee was constituted wherein it was held that "The house unanimously decided that all the DSsP shall be given seniority as per their date of confirmation in light of Police Rule 12.2.(3) in the rank of SI and not from the date of appointment/promotion as ASI."

XIII. That it is a trite law that "Seniority is reckoned from the date of confirmation in the substantive rank". But the column showing date of confirmation after the date of appointment/entry into service has been deleted from the impugned seniority list, which is against the law, rules, policy and the canon of justice.

XIV. That it is worth mentioning here that since independence of Pakistan recruitments/promotions are being made as per Police Rules 1934. Furthermore, Police Rules 1934 has been protected under Article 185 of Police Order 2002 because no fresh rules have been framed for Police Service even in all other Provinces including the Province of Punjab, Police Rules 1934 are still in practice for the reason that no Province has yet framed fresh Police Rules under Police Order 2002 or Act of 2017.

- XV. That it will not be out of context to refer Rule 17 of KP Civil Servants (Appointment, Promotion and Transfer) Rules 1989 wherein it has been expressly stated that "if a junior person is promoted to the higher post by superseding the senior person and subsequently that senior person is also promoted, the person already promoted shall stand senior to hi provided that junior person shall not be deemed to have superseded a senior person if the case of senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit."
- XVI. That it is humbly submitted that while making promotions at divisional levels, the requirements of Police Rules for qualifying promotions to the rank of Sub Inspector are ignored and a time-barred retrospective seniorities are granted carelessly without examining and assessment whether the person had observed all the qualification criterion and pre-requisite for the said promotion, causing disturbance in the seniority list.
- XVII. That it is humbly submitted that the impugned seniority list is liable to be set aside and revised, keeping in view, the seniority in confirmation as Assistant Sub Inspector, Sub Inspector, Inspector and entry to the promotion lists D, E & F as provided and maintained in the law, rules and norms of justice.
- XVIII. That needless to point out that under the Police Rules, promotion list are separately maintained from the seniority lists such as A, A1,

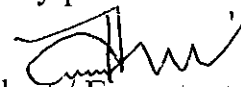
19

Ba, C, D, E and F. the confirmed officers from the seniority list are picked up for the promotion at district, divisional and provincial level to the next higher rank making a pyramid to filter good & bad. The leftover is constrained to improve their performance and compete for promotion to achieve the goal of "seniority cum fitness" another golden principle for promotion as envisaged in Police Rules 13.1.

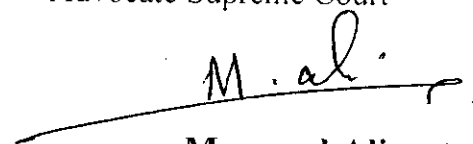
XIX. That Appellant craves permission for its counsel to raise or urge any other ground at the time of hearing of the Petition.


Prayer: Considering the above submissions, it is, therefore, most respectfully prayed that by way of acceptance of this Appeal, this Honourable Court may please vacate / set aside the impugned orders no. 97 and 98 dated 15.04.2020 , Committee Report no. 4844/EP dated 04.04.2020 and Revised Seniority List "F" Notification No. 840/se-i dated 30.04.2020 may kindly be declared as null and void and any other orders / promotions is done under the grab of revised seniority list "F" may kindly be set aside and the Seniority List No. 347/SE-I dated 19.03.2019 may kindly be restored in its letter and spirit.

Or any other relief deemed appropriate by this Honourable Tribunal under the circumstances may please also be granted.


Appellant / Executant
Through


Isaac Ali Qazi
Advocate Supreme Court


Maqsood Ali
Advocate High Court

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL** 
PESHAWAR

In Re: Writ Petition No. _____/2020

With Interim Relief

Tauheed Khan s/o Abdul Hameed Khan
DSP (Acting SP Special Branch) Khyber Pakhtunkhwa

..... *Appellant*

Versus

Inspector General of Police / Provincial Police Officer & Others

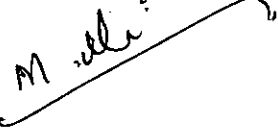
..... *Respondents*

AFFIDAVIT

I, Tauheed Khan s/o Abdul Hameed Khan, Appellant, solemnly affirm and declare on oath that contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed intentionally from this Honourable Court.

Deponent

Identified by:



Maqsood Ali
Advocate High Court



**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

①

In Re: C.M. No. _____/2020
In Service Appeal No. _____/2020

Tauheed Khan s/o Abdul Hameed Khan

..... *Appellant*

Versus

Inspector General of Police / Provincial Police Officer & Others

..... *Respondents*

URGENT Application for Interim Relief

Respectfully Sheweth,

The Applicant humbly submits as under:-

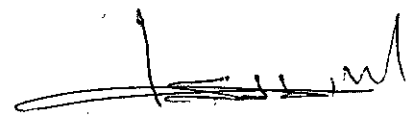
1. That Applicant is filing the instant Petition before this august Court in which no date has been fixed.
2. That the facts and grounds mentioned in the Petition may kindly be considered as an integral part of this Application.
3. That Applicant has an excellent *prima facie* case in his favor and there is genuine hope of its success.
4. That balance of convenience is also in favor of the Applicant and if the interim relief sought was not granted the Applicant would suffer irreparable loss.

5. That impugned orders are erred both in law and facts, hence, not sustainable in the eyes of law. That the impugned Orders / Committee Report / Revised Seniority List are highly misconceived not only against the law and facts but also for some compelling reasons not get promoted because of his own short coming designed to extend the benefit to few individuals that is too at the alter of suppressing efficiency and competency in the Police Service. That impugned Orders / Notification / Recommendation are not only against law and justice but also attracts principle of estoppel and hit limitation, hence, not sustainable.

6. It is, therefore, humbly prayed that on acceptance this Application, impugned Orders and specifically Notification dated 22.05.2020 to the extent of Respondents-5 & 6 may please be suspended till final decision of main Appeal.

Any other relief deems appropriate in the circumstances may please also be granted.

Applicant
through



Isaac Ali Qazi

Advocate Supreme Court

Isaac Law Associates

Advocates & Consultants

12, K-3, Phase-III, Hayatabad, Peshawar

Phone 5817132, 5818446, Mobile: 0300 8594555

Email: isaac.ali.qazi@gmail.com

www.isaaclaw.org

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

(23)

In Re: C.M. No. _____/2020
In Service Appeal No. _____/2020

Tauheed Khan s/o Abdul Hameed Khan

..... *Appellant*



Versus

Inspector General of Police / Provincial Police Officer & Others

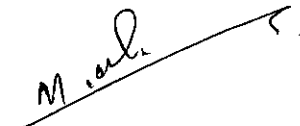
..... *Respondents*

Affidavit

I, Tauheed Khan s/o Abdul Hameed Khan, Applicant, do hereby solemnly affirm that contents of this Application are true and correct to the best of knowledge and belief and nothing has been concealed intentionally from this honourable Tribunal.

Deponent


11-6-2020

Identified By:


Maqsood Ali
Advocate High Court

23-A

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

In Re: C.M. No. _____/2020
In Service Appeal No. _____/2020

Tauheed Khan s/o Abdul Hameed Khan

..... *Appellant*

Versus

Inspector General of Police / Provincial Police Officer & Others

..... *Respondents*

Application for Condonation of Time Bar, IF ANY

Respectfully Sheweth,

The Applicant-Appellant humbly submits as under:

1. That the Applicant has been performing his services in the KP Police Department and have been assigned different tasks to ensure peace and tranquility in the society.
2. That the Applicant has been performing his duties in his designated post as Superintendent of Police and the said area is known for terrorist activities and for the very reason the Applicant has been keenly with his force to ensure peace in the region.
3. That the Applicant having been occupied with the task to control the administration of the region as well as to ensure the safety and security of the region assigned to him.

4. That the Applicant has meetings with the District Administration as well as meeting with SSP and CCPO, Peshawar on daily basis, due to the mentioned reason it is quite impossible to the Applicant to look-after his departmental proceedings regarding his service.

5. That the Applicant was also assigned special duty from 18th of March, 2020 to 30th of June, 2020 during the Covid 19 Pandemic and during that interval the Applicant was not able to focus on his departmental litigation about their service matters, furthermore, the administrative block and the high-up's offices were also closed due to the above mentioned reason.

Prayer: It is, respectfully prayed that the instant Application may graciously be accepted and the delay in filing of the Appeal, IF ANY, may please be condoned in the interest of justice and the Appeal may please be decided on merits and mere technicalities be avoided.

Any other relief deems appropriate in the circumstances may please also be granted to the Applicant.

Applicant
through

Maqsood Ali
Maqsood Ali
Advocate High Court

23-6

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR**

In Re: C.M. No. _____/2020
In Service Appeal No. _____/2020

Tauheed Khan s/o Abdul Hameed Khan

..... *Appellant*

Versus

Inspector General of Police / Provincial Police Officer & Others

..... *Respondents*

Affidavit

I, Tauheed Khan s/o Abdul Hameed Khan, Applicant, do hereby solemnly affirm and declare on oath that contents of this Application are true and correct to the best of knowledge and belief and nothing has been concealed intentionally from this Honourable Tribunal.

Identified By:

M. ali

Maqsood Ali
Advocate High Court

Deponent



S. No.	Name	Date of Joining as ASI	Date of Promotion as Sub-Inspector		Date of Promotion as Inspector		Date of Promotion as DSP	
			Officiating	Confirmation	Officiating	Confirmation	Officiating	Confirmation
1.	Abdus Salam Khalid	01.07.1998		15.09.2007	11.01.2008	23.12.2011	02.01.2014	02.01.2015
2.	Arbab Shafi Ullah Jan	01.03.2000		15.09.2007	11.01.2008	23.12.2012	02.01.2014	02.01.2015
3.	Aslam Nawaz Khan	11.01.1995	14.07.2001	04.02.2004	16.12.2005	03.05.2008	31.03.2012	31.03.2013
4.	Arif Khan	16.04.1991		04.05.2003	14.10.2004	03.05.2008	19.03.2012	19.03.2013
5.	Darwesh Khan	08.04.1984	30.12.1993	24.10.2002	30.01.2006	24.02.2009	19.03.2012	26.07.2017
6.	Fazli Wahid	16.12.1998		19.12.2009	30.07.2010	2013	30.09.2016	30.09.2017
7.	Khan Khel	01.03.2000		26.09.2007	05.04.2008	23.12.2011	24.01.2014	24.01.2015
8.	Muhammad Atiq Shah	26.12.2000		26.01.2008	05.04.2008	23.12.2011	06.02.2014	06.02.2015
9.	Muhammad Ayaz Khan	29.07.1998	17.11.2001	15.05.2004	05.06.2006	30.07.2008	07.12.2012	03.07.2018
10.	Muhammad Ishtiaq	29.07.1998	17.11.2001	15.05.2004	05.06.2006	30.07.2008	07.12.2012	03.07.2018
11.	Muhammad Jamil Akhtar	29.07.1998	17.11.2001	15.05.2004	05.06.2006	30.07.2008	07.12.2012	03.07.2017
12.	Mujeeb-ur-Rehman	11.01.1995	17.04.2004	18.08.2008	05.03.2009	2012	02.04.2015	02.04.2016
13.	Mushtaq Ahmad	23.01.1995		30.03.2004	27.03.2007	28.01.2010	25.03.2013	25.03.2014
14.	Nisar Ahmad Khan	22.11.1995		16.11.2005	27.03.2007	28.01.2010	07.11.2012	07.11.2013
15.	Nazir Ahmad	22.11.1995		16.11.2005	27.03.2007	28.01.2010	07.11.2012	07.11.2013
16.	Qamar Hayat Khan	31.12.1994		11.05.2004	16.12.2005	31.05.2008	07.11.2012	07.11.2013
17.	Saeed Akhtar	29.07.1998	17.11.2001	11.05.2004	05.06.2006	16.06.2008	07.11.2012	08.11.2013
18.	Salah-Ud-Din Kundi	01.02.1995	28.11.2011	11.05.2003	28.04.2007	28.01.2010	07-11-2012	19.03.2013
19.	Salim Aman Ullah	13.02.1996		06.09.2006	05.04.2008	28.01.2010	19.07.2013	19.07.2014
20.	Tauheed Khan	17.05.1983		07.04.2003	16.12.2005	03.05.2008	19.03.2012	19.03.2014
21.	Shafi Ullah Khan	01.02.1995		01.05.2004	16.12.2005	03.05.2008	07.11.2012	07.11.2013
22.	Shaukat Ali	23.01.1995		11.04.2003	27.03.2007	28.01.2010	16.10.2012	16.10.2013
23.	Syed Mukhtiar Shah	29.07.1998	17.11.2001	11.05.2004	05.06.2006	16.06.2008	24.01.2014	24.01.2015
24.	Tahir Iqbal	31.12.1995	11.05.2004	20.12.2006	27.03.2007	28.01.2010	25.03.2013	25.03.2014
25.	Tariq Iqbal	21.12.1995	19.11.2001	06.02.2004	16.12.2005	03.05.2008	31.03.2012	31.03.2013
26.	Tariq Habib	21.12.1995	19.11.2001	01.01.2004	16.12.2005	03.05.2008	31.03.2012	31.03.2013
27.	Waqar Ahmed	02.10.1988	01.04.1999	17.12.2003	17.12.2005	03.05.2008	19.03.2012	19.03.2014

ATTESTED
To Be True Copy

M. Adil

Asst-I

(Signature)

No. 347

/SE-I, The Seniority List of DSsP-BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned.

Date: 19/3/2019

S.No.	Name of Officers	Date of Birth	Date of Superannuation	Domicile	Qualif	D.O. Promotion as DSP	Promotion of Notification	Remarks
1.	Mr. Arif Javed	08.02.1964	07-02-2024	Haripur	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	Appointed as (SP BS-18) on Acting Charge Basis vide Govt. of Khyber Pakhtunkhwa Establishment Department Notification No. SO (E-I) E&AD/4/2019, dated 28 th January 2019.
2.	Mr. Aman Ullah	09.07.1964	08-07-2024	Bannu	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
3.	Mr. Tariq Mehmood	28.04.1965	27-04-2025	Abbottabad	BA	30.06.2011	Notification No S/387/2011 dt: 30.06.2011	Appointed as (SP BS-18) on Acting Charge Basis vide Govt. of Khyber Pakhtunkhwa Establishment Department Notification No. SO (E-I) E&AD/4/2019, dated 28 th January 2019.
4.	Mr. Ijaz Ahmed	15.06.1966	14-06-2026	Abbottabad	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
5.	Mr. Jaiyas Khan	10.02.1965	09-02-2025	Haripur	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
6.	Mr. Mukhtiar Ahmad	04.02.1969	03-02-2029	Abbottabad	FA	30.06.2011	Notification No S/387/2011 dt: 30.06.2011	
7.	Mr. Muhammad Sulaman	28.07.1970	27-07-2030	Abbottabad	MA	30.06.2011	Notification No S/387/2011 dt: 30.06.2011	
8.	Mr. Asif Gohar	07.08.1964	06-08-2024	Mansehra	10 th	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
9.	Mr. Amir Shahzad	09.08.1968	08-08-2028	Peshawar	MA	30.06.2011	Notification No S/387/2011 dt: 30.06.2011	
10.	Mr. Amir Muhammad	07.01.1970	01-01-2030	Buner	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
11.	Mr. Nisar Ahmad	25.03.1960	24-03-2020	Mardan	BA/LLB	30.06.2011	Notification No S/387/2011 dt: 30.06.2011	
12.	Mr. Gul Naseeb	09.11.1968	08-11-2028	Bannu	FSc	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
13.	Mr. Waqar Ahmad	03.01.1968	02-01-2028	Nowshera	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
14.	Mr. Muhammad Shafiq	13.01.1963	12-01-2023	Bannu	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
15.	Mr. Muhammad Arif	10.03.1969	09-03-2029	Peshawar	MA/LLB	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
16.	Mr. Rafiullah	19.04.1960	18-04-2020	Kohat	10 th	19.03.2012	Notification No S/6949/2012 dt: 25.09.2012	
17.	Mr. Tahir ur Rahman	28.02.1969	27-02-2029	Haripur	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
18.	Mr. Darvesh Khan	14.06.1962	13-06-2022	Mardan	MA/LLB	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
19.	Mr. Fauheed Khan	20.10.1963	19-10-2023	Dikhan	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
20.	Mr. Salah-ud-Din	15.01.1970	14-01-2030	Tank	MA	07.11.2012	Notification No S/8083/2012 dt: 07.11.2012	
21.	Mr. Gul Nawaz	02.12.1959	01-12-2019	Swabi	MA	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
22.	Mr. Noor Jamal	10.01.1966	09-01-2026	Mardan	MA	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
23.	Mr. Muhammad Arif	22.04.1964	21-04-2024	Bannu	BA	07.11.2012	Notification No S/8083/2012 dt: 07.11.2012	
24.	Mr. Tariq Habib	05.09.1968	04-09-2028	Peshawar	MA	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
25.	Mr. Nisar Ahmad	02.11.1973	01-11-2033	Charsadda	BA	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
26.	Mr. Aslam Nawaz	01.03.1972	28-02-2032	Bannu	MA/LLB	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
27.	Mr. Tariq Iqbal	13.04.1974	12-04-2034	Peshawar	MSc/LLB	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
28.	Mr. Saadullah	10.01.1969	09-01-2029	Lakki	BA	31.03.2012	Notification No S/2383/2012 dt: 31.03.2012	
29.	Mr. Riaz Ahmad	10.01.1960	31-12-2019	MKD	BA	07.11.2012	Notification No S/8083/2012 dt: 07.11.2012	
30.	Mr. Bakht Zada	15.02.1962	14-02-2022	Buner	BA	07.11.2012	Notification No S/8083/2012 dt: 07.11.2012	

Just - II

26

26

ATTESTED

M. J.

To Be True Copy

		Birth	Superannuation	Home	Qual.	Promotion as DSP	Notification of Promotion	
31.	Mr. Qauid Kamal	01.01.1963	31-12-2023	Charsadda	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
32.	Mr. Banaras Khan	05.01.1962	04.01.2022	Nowshera	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
33.	Mr. Shafiqullah	01.04.1971	31-03-2031	DIKhan	MA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
34.	Mr. Munir Hussain	30.05.1966	29-05-2026	Manshera	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
35.	Mr. Tahir Iqbal	20.01.1969	19-01-2029	Haripur	B.Sc.	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	Revised seniority was granted vide Order No. 909/E-11 dated 12.12.2018
36.	Mr. Qamar Hayat	08.04.1971	07-04-2031	Haripur	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
37.	Mr. Zulfiqar Khan Jadoon	15.06.1963	14-06-2023	Abbottabad	BA	25.03.2013	Notification No. S/1791/2013 dt: 25.03.2013	
38.	Mr. Nazir Ahmad	02.02.1970	01-02-2030	Abbottabad	MLA/B.Ed.	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
39.	Mr. Saad Akhtar	02.02.1971	01-02-2031	Abbottabad	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
40.	Mr. Muhammad Ayaz	05.03.1975	02-03-2035	Abbottabad	BSc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
41.	Muhammad Jamil Akhtar	22.02.1977	21-02-2037	Haripur	B.Sc.	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
42.	Mr. Falak Niaz	01.04.1965	31-03-2025	Swabi	MA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
43.	Mr. Ishtiaq Alimad	01.11.1971	30-10-2031	Lakki	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
44.	Mr. Iftikhar Shah	30.04.1966	29.04.2026	Mardan	M.A.	25.03.2016	Notification No. S/12/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.575/CPB dated 19.05.2017
45.	Mr. Shaukat Ali	05.03.1971	04-03-2031	Swabi	BSc	30.11.2012	Notification No. S/8772/2012 dt: 30.11.2012	
46.	Mr. Abdul Samad	14.04.1969	13.04.2029	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
47.	Mr. Mushtaq Ahmad	15.03.1970	14-03-2030	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
48.	Mr. Sajjad Ahmad	01.04.1968	31-03-2028	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
49.	Mr. Abdur Rashid Marwat	30.03.1963	29-03-2023	Lakki	10 th	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
50.	Mr. Muzamil Shah	08.03.1972	07-03-2032	Swabi	M.A/LLB	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
51.	Mr. Niaz Muhammad	11.02.1971	10-02-2031	Swabi	MA/LLB	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
52.	Mr. Shah Hassan	01.05.1968	30-04-2028	Mardan	MA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
53.	Sajjad Ahmad Suhbizada	02.02.1971	01-02-2031	Swabi	BA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
54.	Mr. Nazir Khan	18.10.1970	17-10-2030	Mardan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
55.	Mr. Abdül Hai	01.08.1972	31-07-2032	D.I.Khan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
56.	Mr. Saleem Aman Ullah	23.03.1970	22-03-2030	Peshawar	FA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
57.	Mr. Zia Hassan	01.11.1974	31-10-2034	DIKhan	M.A/Pol	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
58.	Mr. Muhammad Asiraf	20.04.1960	19-04-2020	Banau	10 th	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
59.	Mr. Abdus Salam Khalid	24.06.1976	23.06.2036	Lakki	M.A	25.03.2016	Notification No. S/12/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
60.	Arbab Shafiqullah	09.10.1966	08-10-2026	Peshawar	FA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
61.	Mr. Raquillah	12.03.1968	11-03-2028	Peshawar	FA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
62.	Mr. Anjid Ali	18.03.1963	17-03-2023	Swat	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
63.	Mr. Muhammad Naeem	10.10.1960	09-10-2020	MKD	10 th	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
64.	Mr. Muhammad Khalid	01.01.1970	31-12-2029	Chitral	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
65.	Mr. Faisal Mulla	03.02.1960	02-02-2020	Peshawar	FA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
66.	Syed Inayat Ali Shah	10.01.1972	09-01-2032	D.I.Khan	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	

ATTESTED
To Be True Copy

(Signature)

25

		Birth	Superannuation	Domestic	Qual	Promotion as DSP	Promotion or Notification	
67.	Mr. Niaz Gul	07.03.1971	06-03-2031	Abbottabad	BSc	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
68.	Mr. Muhammad Ishtiaq	04.05.1973	03-05-2033	Manshra	BSc	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
69.	Mr. Zahid-ur-Rehman	25.03.1970	24.03.2030	Haripur	MSc	08.04.2016	Notification No. 373/SE-I dt: 08.04.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
70.	Syed Mukhtiar Shah	18.10.1967	17-10-2027	Haripur	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
71.	Muhammad Tahir Shah	01.03.1972	28-03-2032	Bannu	BA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
72.	Mr. Nisar Muhammad	20.01.1973	19-01-2033	Lakki	BA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
73.	Mr. Noor Zamin Shah	30.01.1962	29-01-2022	Mardan	BA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
74.	Mr. Khan Khel	10.04.1969	09-04-2029	Mardan	BA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
75.	Muhammad Aleem Jan	11.04.1967	10-04-2027	Charsadda	BSc	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
76.	Mr. Tajaniul Khan	30.09.1965	29.09.2025	Swabi	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
77.	Mr. Hameedullah	25.04.1974	24-04-2034	Mardan	BA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
78.	Mr. Taj Malook	10.04.1961	09-04-2021	Swabi	FA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
79.	Muhammad Atiq Shah	01.09.1978	30-08-2038	Charsadda	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014	
80.	Mr. Zar Wali	20.01.1961	19-01-2021	Peshawar	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014	
81.	Muhammad Javed	03.06.1963	14.03.2025	Manshra	10 th	27.10.2015	Notification No. 4029/SE-I dt: 27.10.2015	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
82.	Mr. Ijaz Ahmad	05.04.1963	04.04.2023	Manshra	FA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
83.	Mr. Arshad Mehmood	15.08.1964	14.08.2024	Manshra	FA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
84.	Mr. Hussain Badshah	11.05.1959	10.05.2019	Karak	FA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
85.	Mr. Shakeel Ahmad	14.04.1969	13.04.2029	Charsadda	BSc	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
86.	Mr. Muhammad Saeed	04.05.1969	03.05.2029	Mardan	BA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
87.	Mr. Khabir Muhammad	01.01.1972	31.12.2031	Abbottabad	MA/LLB	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
88.	Ms. Nazia Naurcen	01.12.1970	30.11.2030	Abbottabad	FA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
89.	Mrs. Shahzadi Noshad	10.04.1972	09.04.2032	Hangu	BA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
90.	Mr. Jehanzeb	03.03.1960	02.03.2020	Manshra	10 th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
91.	Mr. Rahim Hussain	11.05.1970	10.05.2030	Shangla	BA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
92.	Mr. Amjad Hussain	24.03.1971	23.03.2031	Manshra	FA	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
93.	Mr. Rizwan Habib	19.04.1974	18.04.2034	Manshra	B.A.	12.09.2014	Notification No. 1092/E-II dt: 12.09.2014	
94.	Mr. Jhangir Khan	10.11.1965	09.11.2025	Abbottabad	10 th	24.10.2014	Notification No. S/3528/14 dt: 24.10.2014	
95.	Mr. Shamraiz Khan	10.02.1960	09.02.2020	Abbottabad	10 th	24.10.2014	Notification No. S/3528/14 dt: 24.10.2014	
96.	Mr. Muhammad Riaz	01.04.1959	31.03.2019	Abbottabad	10 th	24.10.2014	Notification No. S/3528/14 dt: 24.10.2014	
97.	Mr. Rahmat Ullah	05.03.1971	04.03.2031	Nowshera	FA	24.10.2014	Notification No. S/3528/14 dt: 24.10.2014	
98.	Mr. Rashid Iqbal	15.1.1974	14.01.2034	Mardan	MSc	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Revised seniority was granted vide Notification No. 20/SE-I dated

27

28

ATTESTED

M. A. S.

To the Controller

		Birth	Superannuation	Domicile	Qual	Promotion as DSP	Promotion or Notification	
99.	Mr. Alamzeb	12.02.1980	11.02.2040	Mardan	F.Sc	24.10.2014		03.01.2018
100.	Mr. Zahir Shah	01.04.1962	31.05.2022	Buner	FA	24.10.2014	Notification No. S/3528/14 dt:24.10.2014	
101.	Mr. Zafar Khan	10.01.1965	09.01.2023	Buner	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
102.	Mr. Asad Mehmood	08.03.1968	07.03.2028	Loralai	BA	24.10.2014	Notification No. S/3528/14 dt:24.10.2014	
103.	Mr. Muzakir Shuh	01.06.1961	31.05.2021	Charsadda	10 th	02.04.2015	Notification No. S/3528/14 dt:24.10.2014	
104.	Mr. Muhammad Aslam	08.04.1962	07.04.2022	Karak	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
105.	Mr. Safdar Khan	30.04.1971	29.04.2031	Kohat	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
106.	Mr. Murad Ali	09.01.1973	08.01.2033	Bannu	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
107.	Mr. Mujeeb Ur Rehman	02.04.1969	01.04.2029	Bannu	B.Sc/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
108.	Ms. Anela Naz	09.10.1971	08.10.2031	Peshawar	M.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
109.	Ms. Asmat Ara	15.04.1975	14.04.2035	Swabi	MA/B.Ed	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
110.	Mrs. Shaltzia Shabid	30.04.1976	29.04.2036	Charsadda	MA/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
111.	Mrs. Rozia Altaf	30.07.1969	29.07.2029	Peshawar	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
112.	Ms. Hamida Bano	04.12.1970	03.12.2030	Peshawar	BA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
113.	Mr. Mustafa Kamal Pasha	01.09.1979	31.08.2039	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
114.	Mr. Azmat Ali Khan	06.01.1970	05.01.2030	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
115.	Mr. Waqar Ahmad	12.04.1974	11.04.2034	Charsadda	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
116.	Mr. Sajjad Hussain	23.03.1976	22.03.2036	Nowshera	B.Sc/Hon	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
117.	Mr. Yasir Aman	11.08.1970	10.08.2030	Peshawar	D.Com	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
118.	Mr. Muhammad Maroof	05.10.1974	04.10.2034	Abbottabad	B.Sc	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
119.	Mr. Abdul Hameed	22.03.1959	21.03.2019	Abbottabad	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
120.	Mr. Usman Ghani	09.07.1960	08.07.2020	Peshawar	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
121.	Mr. Ali Gohar	23.03.1968	22.03.2028	K. Agency	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
122.	Pir Mohsin Shah	01.01.1960	31.12.2020	DIK	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
123.	Muhammad Ilyas	25.12.1973	24.11.2033	Mardan	B.A	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
124.	Mr. Rokhan Zeb	07.04.1965	06.04.2025	Swabi	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
125.	Mr. Jehanzada	01.04.1963	31.03.2023	Charsadda	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
126.	Mr. Naseer Ali	03.10.1975	02.10.2035	Charsadda	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
127.	Mr. Muhammad Rauf	04.04.1963	03.04.2023	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
128.	Mr. Hidayat Ullah Shah	20.04.1965	19.04.2025	Swabi	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018

		Birth	Superannuation	Qualification	Qualification	Promotion as DSP	Promotion or Notification	
129.	Mr. Muhammad Ismail	12.06.1966	11.06.2026	Lakki	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
130.	Mr. Shabir Hussain Shah	15.06.1972	14.06.2032	Lakki	MA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
131.	Mr. Aqil Hussain	01.04.1965	30.04.2025	Kohat	BA/LLB	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
132.	Mr. Falak Nawaz	03.02.1969	02.02.2029	Kohat	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
133.	Mr. Shoukat Ali Shah	09.10.1960	08.10.2020	Kohat	10th	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
134.	Mr. Asar Khan	30.01.1961	29.01.2021	Karak	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No. 261/SE-I dated 07.03.2018
135.	Mr. Khalid Usman	06.01.1967	05.01.2027	Karak	FA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
136.	Mr. Nasir Khan	20.12.1972	19.12.2032	Peshawar	BA	30.01.2018	Notification No. 113/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
137.	Mr. Ghārih Nawaz	06.09.1961	05.09.2021	Karak	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
138.	Mr. Riaz Ali	01.12.1959	30.11.2019	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
139.	Mr. Muhammad Sattar Khan	04.04.1964	03.04.2024	Chitral	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
140.	Mr. Muhammad Zaman	01.01.1965	31.12.2025	Buner	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
141.	Mr. Hayat Ullah	04.08.1965	03.08.2025	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
142.	Mr. Amir Hussain	25.05.1965	24.05.2025	Swabi	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
143.	Mr. Gran Ullah	15.06.1963	14.06.2023	Charsadda	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
144.	Mr. Fazal Wahid	12.01.1971	11.01.2031	Malakand	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
145.	Mr. Gohar Ali	15.11.1974	14.11.2034	Peshawar	BSc	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
146.	Mr. Riaz Khan	03.02.1975	02.02.2035	Peshawar	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
147.	Mr. Izhac Shah	06.03.1966	05.03.2026	Mardan	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
148.	Mr. Habib Ur Rehman	04.03.1966	03.03.2026	Manselira	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
149.	Mr. Aurang Zeb	05.01.1970	04.01.2030	Manselira	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
150.	Mr. Shali Nawaz	08.08.1965	07.08.2025	Manselira	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
151.	Mr. Ghulam Mustafa	02.01.1960	01.01.2020	Abbotabad	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
152.	Mr. Hazrat Nabi	17.09.1959	16.09.2019	Swabi	9th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
153.	Mr. Muhammad Ali Af	12.03.1969	11.03.2029	Haripur	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
154.	Mr. Amjid Ali	24.04.1969	23.04.2029	Swabi	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
155.	Mr. Sher Rehman	05.04.1964	04.04.2024	Mardan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
156.	Mr. Khalid Mehmood	21.05.1961	20.05.2021	Abbotabad	B.A	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
157.	Mr. Riaz Muhaimmad	10.12.1962	09.12.2022	Swabi	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
158.	Mr. Iftikhar Ali Shah	11.05.1976	10.05.2036	Bannu	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
159.	Mr. Murad Ali	13.04.1965	12.04.2025	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
160.	Mr. Zarat Gul	05.10.1960	04.10.2020	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	

ATTESTED
To Be True Copy

M. S. D.

(29)

	Name of Officers	Birth	Superannuation	Domicile	Qual	Promotion as DSP	Promotion or Notification	
161.	Mr. Nasser Khan	01.04.1962	31.03.2022	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
162.	Mr. Arab Nawaz	11.02.1969	10.02.2029	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
163.	Mr. Inayatullah	11.04.1962	10.04.2022	Peshawar	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
164.	Mr. Muhammad Yaseen	30.03.1975	29.03.2035	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
165.	Mr. Muhammad Zaman	18.02.1960	17.02.2020	Mardan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
166.	Mr. Zahoor-Ud- Din Khan	05.05.1963	04.05.2023	D.I.Khan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
167.	Mr. Raza Khan	01.01.1960	31.12.2019	D.I.Khan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
168.	Mr. Savab Gul	12.04.1961	11.04.2021	Mardan	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
169.	Mr. Muhammad Ijaz Khan	01.09.1977	31.08.2037	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
170.	Mr. Shahreen Shahi Gohar	03.03.1971	02.03.2031	Charsadda	BA	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
171.	Mr. Sajjad Haider	20.04.1970	19.04.2030	Abbottabad	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
172.	Mr. Ibrar Khan	20.05.1970	19.05.2030	Abbottabad	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
173.	Mr. Arshad Khan	30.05.1974	29.05.2034	Peshawar	F.Sc	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
174.	Mr. Muhammad Khrushid	12.01.1963	11.01.2023	Mansehra	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
175.	Mr. Muhammad Yaseen	28.12.1973	27.12.2033	Haripur	BA	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
176.	Mr. Iftikhar Ahmad	10.05.1968	09.05.2028	Mansehra	BA	14.03.2017	Notification No. 231/SE-I dt: 14.03.2017	
177.	Mr. Zakir Hussain	09.03.1966	08.03.2026	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
178.	Mr. Muhammad Riaz	01.05.1960	30.04.2020	Mardan	10th	10.03.2017	Notification No. 221/SE-I dt: 10.03.2017	
179.	Mr. Muhammad Amjid	26.03.1960	25.03.2020	Mansehra	8th	08.03.2017	Notification No. 211/SE-I dt: 08.03.2017	
180.	Mrs. Samina Zafar	25.12.1975	24.12.2035	Haripur	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
181.	Mr. Bashir Ahmad	11.05.1962	10.05.2022	Haripur	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2018
182.	Mr. Mehboob	16.12.1965	11.12.2025	Abbottabad	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
183.	Mr. Jamil-ur-Rehman	16.04.1974	15.04.2034	Abbottabad	BA	12.03.2018	Notification No. 274/SE-I dt: 12.03.2018	
184.	Mr. Shahid Adnan	27.03.1973	26.03.2033	D.I.Khan	MA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
185.	Mr. Matloob Shah	07.01.1963	06.01.2023	Mansehra	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
186.	Mr. Muhammad Hamayun	01.04.1963	31.03.2023	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
187.	Mr. Ashiq Hussain	06.12.1960	05.12.2020	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
188.	Mr. Mukhtar Ahmad	06.04.1962	05.04.2022	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
189.	Mr. Adalat Khan	04.08.1960	03.08.2020	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
190.	Mr. Ghulam Multanmiad	01.11.1963	31.11.2023	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
191.	Mr. Muhammad Nabi	09.10.1966	08.10.2026	Charsadda	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
192.	Mr. Ayaz Mehmood	20.02.1971	19.02.2031	Mardan	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
193.	Mr. Shah Mumtaz	20.02.1965	19.02.2025	Dir Lower	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	

70

22

ATTESTED
To Be True Copy

S.No.	Name of Officers	Birth	Superannuation	Domicile	Qual.	Promotion as DSI	Promotion or Notification
194.	Mr. Zafar Ahmad	10.01.1979	09.01.2039	Chitral	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
195.	Mr. Farmanullah	27.10.1978	26.10.2038	Dir. Lower	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
196.	Mr. Muslim Khan	16.02.1970	15.02.2030	Mardan	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
197.	Mr. Saïd Rahim	08.02.1962	07.02.2022	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
198.	Mr. Hukam Khan	14.03.1969	13.03.2029	Charsadda	MA:LLB	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
199.	Mr. Wilayat Khan	20.12.1960	19.12.2020	Peshawar	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
200.	Mr. Mehar Ali	01.01.1969	31.12.2028	Nowshera	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
201.	Mr. Yar Nawab	05.11.1963	04.11.2023	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
202.	Mr. Iftikhar Ali	10.02.1968	09.02.2028	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
203.	Mr. Nasir Khan	22.11.1968	21.11.2028	Charsadda	MA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
204.	Mr. Noor Zaman	21.08.1961	20.08.2021	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
205.	Mr. Hazrat Ullah	05.01.1964	04.01.2024	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
206.	Mr. Liaqat Ali	08.04.1964	07.04.2024	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
207.	Mr. Mehmood Navaz	07.03.1974	06.03.2034	Lakki	EA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
208.	Mr. Muhammad Yousaf	10.02.1961	09.02.2021	DI Khan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
209.	Mr. Umar Daraz Khan	11.08.1961	10.08.2021	DI Khan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
210.	Mr. Bashir Dad	14.04.1972	13.04.2032	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
211.	Mr. Roshan Zeb	16.02.1964	15.02.2024	Mardan	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
212.	Mr. Gul Sheed	01.06.1980	31.05.2040	Charsadda	EA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
213.	Mr. Taj Malook	10.02.1961	09.02.2021	Charsadda	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
214.	Mr. Muhammad Saddique	16.11.1968	15.11.2028	Abbottabad	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
215.	Mr. Abdur Rehman	17.11.1960	16.11.2020	Peshawar	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
216.	Mr. Sanun Jim	06.03.1961	05.03.2021	Peshawar	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
217.	Mr. Tnyab Jan	01.05.1970	30.04.2030	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
218.	Mr. Fazal Subhan	02.05.1968	01.05.2028	Nowshera	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
219.	Mr. Alam Zeb	10.11.1963	09.11.2023	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
220.	Mr. Saeed Khan	15.04.1964	14.04.2024	Peshawar	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
221.	Mr. Noor Ullah	10.05.1964	09.05.2024	Peshawar	D:Com	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
222.	Mr. Pasham Gul	29.04.1963	28.04.2023	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
223.	Mr. Mukhtiar Ahmad	03.12.1964	02.12.2024	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018
224.	Mr. Zahir ur Rehman	10.01.1962	09.01.2022	Shangla	10th	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
225.	Mr. Sher Afsar	09.02.1963	08.02.2023	Swabi	10th	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
226.	Mr. Asad Zubair	15.01.1980	14.01.2040	Kohat	E:Sc	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
227.	Mr. Muhammad Saleem Tariq	01.03.1969	28.02.2029	DI Khan	FA	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
228.	Mr. Muhammad Javed	03.02.1964	02.02.2024	Manshera	10th	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
229.	Mr. Fazal Wahid	01.12.1968	30.11.2028	Mardan	10th	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
230.	Mr. Amir Nawaz	20.03.1970	19.03.2030	Charsadda	EA	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
231.	Mr. Liaqat Khan	10.06.1962	09.06.2022	Peshawar	10th	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
232.	Mr. Muhammad Shoaib	29.03.1962	28.03.2022	Mardan	FA	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
233.	Mr. Afsar Zaman	01.09.1969	31.08.2029	Mardan	FA	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018
234.	Mr. Abdur Rashid	03.05.1968	02.05.2028	Charsadda	BA	29.11.2018	Notification No. 1078/SE-I dt: 29.11.2018

ATTESTED
To Be True Copy

[Signature]

528

Sl. No.	NAME OF OFFICER	Birth	Superannuation	Domene	QUR	Promotion as DSP	Promotion of notification
235.	Mr. Khalid Khan	02.01.1969	01.01.2029	Nowshera	MA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
236.	Mr. Niaz Muhammad	14.09.1973	13.09.2033	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
237.	Mr. Allama Iqbal	05.03.1979	04.03.2039	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
238.	Mr. Tauheed Ullah	08.04.1982	07.04.2042	Charsadda	MA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
239.	Mr. Faqir Hussain	02.02.1967	01.02.2027	Peshawar	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
240.	Mr. Zahid Khan	08.04.1967	07.04.2027	Mkd Agency	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
241.	Mr. Badshah Hazrat	15.02.1969	14.02.2029	Dir Lower	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018
242.	Mr. Naveed Iqbal	13.03.1981	12.03.2041	Swat	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018

M
19/3/19

(DR. MUHAMMAD ABID KHAN) PSP
Deputy Inspector General of Police, HQrs.,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.
Copy to all concerned

37

M. A. L.

ATTESTED
To Be True Copy



OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND
REGION SWAT.

Email: diamalakand@yahoo.com

Aux - III

33

NOTIFICATION

No. 11644-68/E, Dated 30/10/2019, Revised Confirmation/Admission to List "E": In the light of Regional Departmental Committee recommendation minutes of the meeting held on 11/07/2019 under the chairmanship of the then RPO, Malakand and co-members DPO, Swat, DPO, Buner, DPO, Dir Lower and DSP, Legal Swat, the revised seniority /confirmation in the rank of ASI/SI List-E of Malakand Region was considered by the constituted committee for evaluation of petitions of those who suffered due to late confirmation in the rank of ASI/SI. Provisional revised confirmation in the rank of ASI/SI and Admission to List "E" was circulated to all concerned for objection if any one be submitted within stipulated period of three months vide this office Memo: No. 8202-49/E, dated 29/07/2019.

As per direction of CPO Peshawar vide Memo: No. 451-62/PPO, dated 23/07/2019 and Police Rules 13.11, 13.12 and 13.13, the revised confirmation as ASI & admission to List "E" and confirmation as SI of the following Police Officers are hereby issued /notified against each their names:-

S #	Name & No.	Category	D.O.B	D.O Joining service	D.O Promotion as ASI Direct Appointee	Revised D.O confirm: as ASI	Revised D.O of Admission to List "E" ASI	D.O Promotion as offg: SI	Revised D.O Confirm: as SI
1.	PASI Rizw Ahmad No. M/26	PASI	01/01/1960	01/04/1983	01/04/1983	01/04/1983	01/04/1986	05/03/1998	According to the revised seniority, he is brought on list-E w.e.f 01/04/1986 and consequently confirmed as SI w.e.f 01/04/1988.
2.	PASI Bakht Zada No. M/33	PASI	15/02/1962	01/04/1983	01/04/1983	01/04/1983	01/04/1986	27/08/1998	According to the revised seniority, he is brought on list-E w.e.f 01/04/1986 and consequently confirmed as SI w.e.f 01/04/1988.
3.	PASI Amjad Ali No. M/147	PASI	18/03/1963	10/11/1987	10/11/1987	10/11/1987	10/11/1990	16/05/2000	According to the revised seniority, he is brought on list-E w.e.f 10/11/1990 and consequently confirmed as SI w.e.f 10/11/1992.
4.	ASI Muznkir Shah No. 185/M	SO No. 11	01/09/1961	01/09/1980	09/12/1991	09/12/1994	09/12/1994	16/04/2005	17/04/2007
5.	ASI Mohammad Noeem No. 2/M	SO No. 11	10/10/1960	01/11/1978	10/02/1992	10/02/1995	10/02/1995	16/04/2005	16/04/2007
6.	ASI Sher Ali No. M/110	SO No. 11	01/04/1960	06/10/1977	11-05-1994	11/05/1997	11/05/1997	16-04-2005	16/04/2007
7.	PASI Muhammad Khalid No.128	PASI	01/01/1970	25/01/1995	25-01-1995	25/01/1995	25/01/1998	01-12-2001	01/12/2003
8.	ASI Zahir Shah No. M/196	SO No. 11	01/04/1962	05/03/1982	03/06/1995	03/06/1998	03/06/1998	16/04/2005	On acceptance of his application, his date of promotion in the light of record / confirmation in the rank of SI has been corrected and consequently confirmed as SI w.e.f 16/04/2007
9.	ASI Zafar Khan No. M/197	SO No. 11	10/01/1963	01/04/1982	03/01/1996	03/01/1999	03/01/1999	16/04/2005	16/04/2007
10.	ASI Muhammad	SO	19/09/1964	29/09/1983	12/02/1996	12/02/1999	12/02/1999	13/07/2005	13/07/2007

M. S. Khan
ATTESTED
To Be True Copy

34

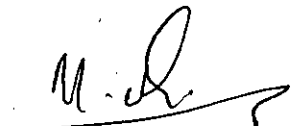
New seniority serial number in preview of revised seniority list order No. 60/E-II
Notification dated 12-02-2020.

S #	NAME	RANK	RECOMMENDATION OF COMMITTEE	OLD POSITION	NEW POSITION
1.	Mr. Riaz Ahmed	DSP	Above the name of Mr. Arif Javed	29	1
2.	Mr. Bakht Zada	DSP	Below the name of Mr. Riaz Ahmed & Above the name of Mr. Arif Javed	30	2
3.	Mr. Amjad Ali	DSP	Below the name of Mr. Bakht zada and above Mr. Arif Javed	62	3
4.	Mr. Muhammad Khalid	DSP	Below the name of Mr. Muhammad Arif and above the name of Mr. Tariq Habib	64	16
5.	Mr. Muhammad Naeem	DSP	Below the name of Mr. Zia Hassan and above the name of Mr. Muhammad Ashraf	63	58
6.	Mr. Zahir Shah	DSP	Below the name of Mr. Muhammad Naeem and above the name of Mr. Zia Hassan	100	59
7.	Mr. Zafar Khan	DSP	Below the name of Mr. Zahir Shah and above the name of Mr. Zia Hassan	101	60
8.	Mr. Muzakir Shah	DSP	Below the name of Mr. Zahir Shah and above the name of Mr. Zia Hassan	103	61
9.	Mr. Muhammad Sattar	DSP	Below the name of Mr. Zia Hassan and above the name of Mr. Abdus Salam Khalid	139	62
10.	Mr. Muhammad Zaman	DSP	Below the name of Mr. Muhammad Sattar and above the name of Mr. Abdus Salam Khalid	140	63
11.	Mr. Riaz Muhammad	DSP	Below the name of Mr. Muhammad Zaman and above the name of Mr. Abdus Salam Khalid	157	64

M. ul.
ATTESTED
To Be True Copy

35

12.	Mr. Hayat Ullah	DSP	Below the name of Mr. Riaz Muhammad and above the name of Mr. Abdus Salam Khalid	141	65
13.	Mr. Shah Mumtaz	DSP	Below the name of Mr. Rehmat Ullah and above the name of Mr.	193	98
14.	Mr. Zafar Ahmad	DSP	Below the name of Mr. Shah Mumtaz and above the name of Mr. Alam Zeb	194	99
15.	Mr. Farman Ullah	DSP	Below the name of Mr. Zafar Ahmed and above the name of Mr. Alamzeb	195	100
16.	Mr. Muhammad Saeed	DSP	Below the name of Mr. Amir Hussain and above the name of Mr. Gran Ullah	Name NOT mentioned in DSPs seniority list	143
17.	Mr. Naveed Iqbal	DSP	Below the name of Mr. Muhammad Saeed and above the name of Mr. Gran Ullah	242	144
18.	Mr. Ajmal Khan	DSP	Below the name of Mr. Navid Iqbal and above the name of Mr. Gran Ullah	Name NOT mentioned in DSPs seniority list	145
19.	Mr. Zahid Khan	DSP	Below the name of Mr. Ajmal Khan and above the name of Mr. Gran Ullah	240	146
20.	Mr. Badshah Hazrat	DSP	Below the name of Mr. Zahid Khan and above the name of Mr. Gran Ullah	241	147
21.	Mr. Ghulam Sadq	DSP	Below the name of Mr. Muhammad Altaf and above the name of Mr. Amjad Ali	Name NOT mentioned in DSPs seniority list	154


ATTESTED
To Be True Copy



Asst

35

OFFICE OF THE
COMMISSIONER OF POLICE
CENTRAL POLICE OFFICE
LAHORE
239. Fax: 091-9210927

No. 62 / II Notification

Dated: 12.02.2020

NOTIFICATION

No. CPO/CH/Invited Seniority/ 62 In the light of Notification of Regional Police Officer, Multan, Region-I issued vide the order No. 11694-CH/1, dated 30/11/2019 and recommendation of Departmental Promotion Committee meeting held on 27/01/2020 in Central Police Office, Lahore, duly approved by the Competent Authority, the following DSPs are hereby assigned revised seniority in the light of Rule 12(3) of Police Rules, 1954 (as amended) to the following officers in the rank of Inspector and Deputy Superintendent of Police in the Seniority List of DSPs issued vide CPO No. 347/SI-1, dated 19/03/2019:

S. No.	Name, Rank & No.	Present Rank	Recommendation of Committee
1.	Mr. Riz Ahmed	DSP	Above the name of Mr. Arif Javed
2.	Mr. Bakht Zaid	DSP	Below the name of Mr. Riz Ahmed and above the name of Mr. Arif Javed.
3.	Mr. Amjad Ali	DSP	Below the name of Mr. Bakht Zaid and above the name of Mr. Arif Javed.
4.	Mr. Muhammad Khalid	DSP	Below the name of Mr. Muhammad Arif and above the name of Mr. Tariq Habib.
5.	Mr. Muhammad Naeem	DSP	Below the name of Mr. Muhammad Arif and above the name of Mr. Zia Hassan.
6.	Mr. Zahir Shah	DSP	Below the name of Mr. Muhammad Naeem and above the name of Mr. Zia Hassan.
7.	Mr. Zafar Khan	DSP	Below the name of Mr. Zahir Shah and above the name of Mr. Zia Hassan.
8.	Mr. Musakir Shah	DSP	Below the name of Mr. Zahir Shah and above the name of Mr. Zia Hassan.
9.	Mr. Muhammad Sattar	DSP	Below the name of Mr. Zia Hassan and above the name of Mr. Abdus Salam Khalid.
10.	Mr. Muhammad Zainab	DSP	Below the name of Mr. Muhammad Sattar and above the name of Mr. Abdus Salam Khalid.
11.	Mr. Muhammad Zainab	DSP	Below the name of Mr. Muhammad Zainab and above the name of Mr. Abdus Salam Khalid.
12.	Mr. Muhammad Zainab	DSP	Below the name of Mr. Riz Ahmed and above the name of Mr. Abdus Salam Khalid.
13.	Mr. Muhammad Zainab	DSP	Below the name of Mr. Riz Ahmed and above the name of Mr. Abdus Salam Khalid.
14.	Mr. Muhammad Zainab	DSP	Below the name of Mr. Riz Ahmed and above the name of Mr. Abdus Salam Khalid.
15.	Mr. Muhammad Zainab	DSP	Below the name of Mr. Riz Ahmed and above the name of Mr. Abdus Salam Khalid.

24-12-2001 = 19-11-2003

M. S. Khan
ATTESTED
To Be True Copy

**OFFICE OF THE
INSPECTOR CENTRAL OF POLICE
KEYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR**

PH: 091-9210239 Fax: 091-9210927

No.60/E-H/Notification

dated. 12.02.2020

NOTIFICATION.

No. CPO/E-H/Revised Seniority/ 61. In the light of Notification of Regional Police Officer, Malakand Region issued vide his office No. 11644-68/E, dated 30.10.2019 and recommendations of Department Promotion Committee meeting held on 31.01.2020, in central Police office. Peshawar duly approved by the Competent Authority, the following DSsp are hereby assigned revised seniority in the light of Rules 12.2 (3) of Police Rules 1934 with their colleagues in list "F" in the ranks of the inspectors and Deputy Superintendent of Police in the Seniority List of DSsP issued vide CPO No. 347/SE-I, dated 19.03.2019

S. No	Name, Rank & no.	Present Rank	Recommendation of Committee
1.	Mr. Riāz Ahmed	DSP	Above of Mr. Arif Javed
2.	Mr. Bakht Zada	DSP	Below the name of Mr. Riāz Ahmed and Above the name of Mr. Arif Javed
3.	Mr. Amjad Ali	DSP	Below the name of Mr. Bakht Zada and above of the name of Mr. Arif Javed
4.	Mr. Muhammad Khalid	DSP	Below the name of Mr. Muhammad Arif and above the name of MR. Tariq Habib
5.	Mr. Muhaamd Naeem	DSP	Below the name of the Mr. Muhammad Ashraf and above the name of Mr. Zia Hassan
6.	Mr. Zahir Shah	DSP	Below the name of Mr. Muhammad Naeem and above the name of the Mr. Zia Hassan
7.	Mr. Zafar Shah	DSP	Below the name of Mr. Zahir Shah and above the name of the Mr. Zia Hassan
8.	Mr. Muzakir Shah	DSP	Below the name of Mr. Zahir Shah and above the name of Mr. Zia Hassan
9.	Mr. Muhammad Sattar	DSP	Below the name of Mr. Zia Hassan and above the name of Mr. Salam Khalid
10.	Mr. Muhammad Zaman	DSP	Below the name of Mr. Muhammad Sattar and above the name of Mr. Abdus Salam Khalid
11.	Mr. Riaz Muhammad	DSP	Below the name of Mr. Muhammad Zaman and above the name of Mr. Abdus Salam Khalid
12.	Mr. Hayat Ullah	DSP	Below the name of Mr. Riaz Muhammad and above the name of Mr. Abdus Salam Khalid
13.	Mr. Shah Mumtaz	DSP	Below the name of Mr. Rehmat Ullah and above the name of Mr.

M. al.
ATTESTED

To Be True Copy

37



INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
PH: 091-9210239 Fax: 091-9210927

No. /E-11/Notification

Dated: 02/2020

14.	Mr. Zafar Ahmad	DSP	Below the name of Mr. Shah Munir and above the name of Mr. Akmal
15.	Mr. Farman Ullah	DSP	Below the name of Mr. Zafar Ahmad and above the name of Mr. Akmal
16.	Mr. Muhammad Haseeb	DSP	Below the name of Mr. Arab Hussain and above the name of Mr. Gran Ullah
17.	Mr. Navid Iqbal	DSP	Below the name of Mr. Muhammad Haseeb and above the name of Mr. Gran Ullah
18.	Mr. Ajmal Khan	DSP	Below the name of Mr. Navid Iqbal and above the name of Mr. Gran Ullah
19.	Mr. Zahid Khan	DSP	Below the name of Mr. Ajmal Khan and above the name of Mr. Gran Ullah
20.	Mr. Badshah Hameed	DSP	Below the name of Mr. Zahid Khan and above the name of Mr. Gran Ullah
21.	Mr. Ghulam Sadiq	DSP	Below the name of Mr. Muhammad Akmal and above the name of Mr. Amjad Ali

Sd/-
(DR. ISHTIAQ AHMAD) PSP/PPM
Addl. Inspector General of Police HQrs
For Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

Enclst. No. & date even.

Copy forwarded to the:-

1. Addl. Inspector General of Police HQrs Khyber Pakhtunkhwa
2. Deputy Inspector General of Police HQrs Khyber Pakhtunkhwa
3. All Heads of Police in Khyber Pakhtunkhwa
4. The COS to W/CP Khyber Pakhtunkhwa Peshawar
5. Assistant Inspector General of Police Legal CPO Peshawar
6. The Registrar CPO Peshawar
7. Commandant Establishment, Career Planning Branch & Secret Branch, CPO Peshawar
8. CPO Peshawar

(ZABOUBA FIKRAN) PSI
ATG/Establishment
For Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

M. Sadiq
ATTESTED
To Be True Copy

**OFFICE OF THE
INSPECTOR CENTRAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR**

PH: 091-9210239 Fax: 091-9210927

No.60/E-H/Notification

dated. 12.02.2020

14.	Mr. Zafar Muhammad	DSP	Below the name of Shah Muhammad and above the name of Mr. Alamzeb
15.	Mr. Farman Ullah	DSP	Below the name of MR. Zafar Ahmed and above the name Mr. Alamzeb
16.	Mr. Muhammad Saeed	DSP	Below the name of Mr. Muhammad Saeed and above the name of Mr. Gran Ullah
17.	Mr. Navid Iqbal	DSP	Below the name of Mr. Ajmal Khan and above the name of Mr. Gran Ullah
18.	Mr. Ajmal Khan	DSP	Below the name of Mr. Navid Iqbal and above the name of Mr. Gran Ullah
19.	Mr. Zahid Khan	DSP	Below the name of Mr. Ajmal Khan and above the name of Mr. Gran Ullah
20.	Mr. Badshah Hazrat	DSP	Below the name of Mr. Zahid Khan and above the name of Mr. Gran Ullah
21.	Mr. Ghulam Sadiq	DSP	Below the name of Mr. Muhammad Altaf and above the name of Mr. Gran Ullah

Sd/-

(DR. ISHTIAQ AHMED) PSP/PPM
Addl: Inspector General of Police HQrs
For Inspector General of Police
Khyber Pakhtunkhwa

Endst: No. & date even

Copy forwarded to the :-

1. Addl: Inspector General of Police HQrs Khyber Pakhtunkhwa
2. Deputy Inspector General of Police HQrs Khyber Pakhtunkhwa
3. All Heads Police In Khyber Pakhtunkhwa
4. The COS to W/IGP Khyber Pakhtunkhwa
5. Assistant Inspector General of Police legal CPO Peshawar
6. The Registrar CPO Peshawar
7. Office Supdts: Establishment-I, Career Planning Branch & Secret Branch, CPO Peshawar
8. U.O.P File.

Sd/-

(ZAIB ULLAH KHAN) PSP
AIG/ Establishment
For Inspector General of Police
Khyber Pakhtunkhwa, Peshawar

M. Ullah
ATTESTED
To Be True Copy

ANEX - V

38

From: The Superintendent of Police,
Special Branch, South Regions.

To: The Deputy Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa Peshawar.

No. 76 /SB dated Bannu, the 16 /05/2020

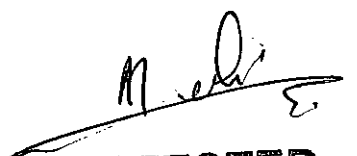
Subject: REPRESENTATION AGAINST PROVISIONAL SENIORITY LIST OF DSsP AS IT
STOOD ON 30.04.2020 ISSUED VIDE ORDER NO.840/ES-1 NOTIFIED BY PPO
PESHAWAR

Memo:

A self-explanatory note of undersigned regarding subject matter is submitted for kind perusal and onward submission to the worthy Inspector General of Police Khyber Pakhtunkhwa Peshawar for further necessary action, please.



Tauheed Khan
SP/Special Branch
South Regions.



ATTESTED
To Be True Copy

39

To: The Provincial Police Officer/IGP
Khyber Pakhtunkhwa,
Peshawar.

Through: Proper Channel

Subject: **REPRESENTATION**

Sir,

**Reference Order/ Notification No.840/SE-1, Dated 30-04- 2020
Issued By CPO Peshawar.**

Tauheed Khan DSP (BPS-17) Serial No.21

Against:

Bakht Zada DSP (BPS-17) Serial No.01
Amjad Ali DSP (BPS-17) Serial No.02
Janas Khan DSP (BPS-17) Serial No.07
Asif Gohar DSP (BPS-17) Serial No.10
Sana Ullah DSP (BPS-17) Serial No.13
Nasir Khan DSP (BPS-17) Serial No.16

Respondents

I approach your good self with the following request;

1. I have joined the department as Assistant Sub Inspector on 01-02-1995 after qualifying the Public Service Commission examination and subsequently confirmed from the date of joining as ASI after successfully completion of probationer period.
2. My name was brought on list "E" on dated 25.04.1998 vide DIG/DIK Endst: 623-28/ES dated 25.04.1998.
3. I have qualified upper class course vide term ending March 1998 from Sihala College.
4. I was promoted as officiating Sub: Inspector w.e.f 23.11.2001 vide DIG/DIK No.2354-55/ES dated 23.11.2001 and after successfully completion of SHO Period according to Police Rule 13.10 (2). I was confirmed in the Rank of SI w.e.f 07.04.2003 vide DIG/DIK Endst: No.385-86/ES dated 23.07.2003.
5. Promoted officiating Inspector w.e.f 20.12.2005 vide Addl: IG/HQrs letter No.24571-640/E-II dated 29.12.2005 and my name was also brought on list "F" w.e.f 20.12.2005 vide notification No.110-13/ES dated 28.01.2006.
6. Then confirmed as Inspector vide Addl:IG/HQrs Notification No.26242-5/E-II dated 27.10.2009.
7. Lastly I got promoted to the Rank of DSP w.e.f 19.03.2012 vide Notification No.7156-7213/E-I dated 13.04.2012.
8. I have qualified Junior Command Course 3rd from 31 July to 28 October 2017 successfully.

M. Iqbal
ATTESTED
To Be

9. Remained posted as acting SP since 2016.
10. Presently I am serving as acting SP/Special Branch South Regions till date.
11. At the very outset I quote the golden principle of seniority i.e. **"Seniority is reckoned from the date of confirmation in the substantive rank"**.
12. The journey from date of appointment to the date of confirmation encompasses years & years. The qualification in the proposed courses (regular & refresher), training in various fields and discipline to improve cognitive skills, test posting in various branches & overall performance, evaluation records are mandatory for confirmation under the Police Rules unlike of other Provincial departments of Civil administration where mainly the length of service matters.
13. Police being the law enforcing agency cannot afford the vacuum and the officiating promotions are offered to fulfill the gap in case of retirement, gallantry, shahadat, promotion etc. The substantive posts are lesser than the actual occupants hence; an officiating officer cannot supersede the confirmed officer, may be the earlier is senior in his batch or otherwise.
14. Needless to point out that under the Police Rules, promotion lists are separately maintained from the seniority lists such as A, A1, B1, C, D, E and F. **The confirmed officers from the seniority list are picked up for the promotion at district, divisional and provincial level to the next higher rank making a pyramid to filter good and bad. The leftover is constrained to improve their performance and compete for promotion to achieve the goal of "seniority cum fitness" another golden principle for promotion as envisaged in Police Rules 13.1.**
15. It will not be out of mention to refer Rule 17 of the N.W.F.P Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 wherein it has been expressly stated that "if a junior person is promoted to the higher post by superseding the senior person and subsequently that senior person is also promoted, the person already promoted shall stand senior to him provided that junior person shall not be deemed to have superseded a senior person if the case of senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit."
16. Finding a chance, I sum up my courage to point out that while making promotions at **divisional levels, the requirements of Police Rules for qualifying promotions to the rank of Sub Inspector are ignored and at times time-barred retrospective seniorities are granted carelessly without knowing the fact whether the person had observed all the qualification criterion and pre-requisite for the said promotion, causing disturbance in the seniority list.**
17. At the very outset I quote the golden principle of seniority i.e. **"Seniority is reckoned from the date of confirmation in the substantive rank"**. But the column showing date of confirmation after the date of appointment/entry into service has been deleted from the impugned seniority list, which is against the law, rules, policy and the canon of justice.
18. It is worth mentioning here that since independence of Pakistan (since 1934) recruitments/promotions are being made as per Police Rules 1934. Furthermore, Police Rules 1934 has been protected under Article 141 of

M. al.
ATTESTED
To Be True Copy

41

The Khyber Pakhtunkhwa Police Act, 2017 and Article 185 of Police Order 2002 provides that *"the Police rules made under the Police Act 1861 (V of 1861) shall continue to remain in force until altered, repealed or amended by the appropriate authority"* become fresh no rules have been framed for Police department even in all other Provinces including the Province of Punjab, Police Rules 1934 is still in practice for the reason that no Province has yet framed fresh Police Rules under Police Order 2002.

19. Reference to the subject order number, the officers, Mr. Bakht Zada S.No-1, Mr Amjad Ali S.No-2, Janas Khan DSP (BPS-17) Serial No.07, Asif Gohar DSP (BPS-17) Serial No.10, Mr. Sanaullah S.No-13 and Mr. Nasir Khan S.No-16, have been placed senior to me which is against the constitution, police rule, police Act, and direction of worthy supreme court of Pakistan.

SENIORITY POSITION IS TABULATED BELOW

S.No	Name	Rank	Original Position	New Position	Remarks
1.	Mr. Bakht Zada	DSP	30	1	<ul style="list-style-type: none"> a) Mr. Bakht Zada was appointed as TASI (Temporary) while I am appointed as PASI through Public Service Commission b) As he was appointed on temporary basis therefore he was truly not confirmed from the dated of appointment c) He was on the strength of Malakand Region and in that time there was no available vacancy while the applicant was on the strength of DIK Region as probationer and against the available confirmed vacancy. d) He was abroad many times on leave due to which he could not complete the mandatory pre requisite for confirmation as ASI and SI while the applicant fulfilled all the requirements in-time.
2.	Mr. Amjad Ali	DSP	62	2	<ul style="list-style-type: none"> a) He has completed his upper school course in September 2005 which is Mandatory for confirmation as SI while the applicant Passed upper school course in 1999. b) He was promoting as officiating SI regularly on 16-05-2000 while the applicant is promoted on 23.11.2001 and there was no confirm vacancy available for SI at that time in Malakand Region.
3.	Mr. Janas Khan	DSP	7	7	<ul style="list-style-type: none"> a) He was promoted out of turn as per Standing Order No. 11/1987, Letter No. 20710-60/1995, Standing Order No. 07/2003, Standing order No. 17/2014, Standing Order No.05/2016. b) Therefore in compliance the judgment of Supreme Court of Pakistan dated 13.05.2018, and recommendation of the committee constituted for the purpose, the following Standing Order/ Instruction which extend the incentives for the promotion and confirmation to the Cadet Law Instructors and Drill serve in the Police Training College Hangu and order Training Institutions amount to out of turn promotion are hereby withdrawn vide CPO letter No.1001-1100/GB dated 10.01.2019 (Copy is attached) c)
4.	Mr. Asif Gohar	DSP	10	10	-do (As above)-

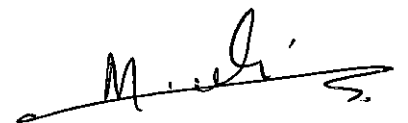
M. Ali
ATTESTED
 To Be True Copy

42

	Mr. Sanaullah	DSP	28	13	a) Mr. Sana Ullah was placed junior than me in the seniority list issued since 2005 of Inspectors and DSsP but he was assigned revised seniority by CPO Peshawar vide Notification No. CPOI/E-II/ revised seniority /33 dated 27.01.2020
6.	Mr.Nasir Khan	DSP	136	16	Mr. Nasir Khan remained Junior ever since the recruitment of the applicant as ASI through Public Service Commission against the vacant seat of ASI on 01.02.1995. The Name of DSP Nasir Khan is brought on list "E" in (FRP) 20.02.2002 while the applicant name has been brought on list "E" w.e.f 25.04.1998.

Detailed service record of Nasir Khan DSP is shown in below comparative table which shows him clearly junior on each and every step of promotions/service record.

DSP Nasir Khan	Date	Applicant
Dated of enrolment as FC	02.05.1991	Applicant got enrolled as ASI through Public Service commission on 01.02.1995.
Lower School Course	20.10.1997	Applicant did lower & Intermediate School Courses as probationer ASI in 1995.
Name brought on List "C" as HC	18.04.1998	Applicant recruited as ASI
Intermediate School Course	10.10.1998	Applicant got confirmed as ASI from the date of enlistment (01.02.1995) after completion of probationer period brought on list "E" w.e.f 25.04.1998 vide DIG/DIK Endst: No.623-28/ES dated 25.04.1998.
Name brought on List "D"	25.05.1999	Qualified Upper Class Course vide term ending March 1999
Selection Grade Officiating ASI (BS.11)	17.02.2000	Applicant already senior
Name brought on List "E" in (FRP)	20.02.2002	Applicant already senior
Transferred to Peshawar from FRP	17.05.2002	Not Concerned
Lien Transferred to Peshawar on (allotted No.167/P)	08.10.2002	Not Concerned
CCPO Peshawar approached Commandant FRP to Seek Guidance/regularization of officer on 26.11.2002 Commandant FRP Issued Revised order and showed his name on list "D" at S.No.4 and list "E" S.No.3	05.11.2002	Not Concerned
DPC placed his name in list "D" of Officiating ASI in merit of year 1998 in which he had passed the Intermediate School Course with his Colleagues.	08.09.2003	Applicant qualified intermediate in 1995.

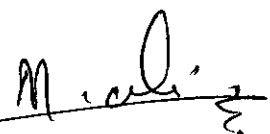


ATTESTED

To Be True Copy

42A

20. **Police Rules 12.2(3)** provides that all appointments of the enrolled Police Officers are on the probation according to the rules in chapter 12 applicable to each rank. Seniority in the case of upper subordinates, will be reckoned in the first instance from the date of first appointment, officers promoted from the lower rank will be considered senior to the persons appointed direct on the same date, and the seniority of the officers appointed direct on the same date will be reckoned according to the age. Seniority shall, however be finally settled by the dates of confirmation. The seniority inter-se of several officers confirmed on the same date being that allotted to them on first appointment. Provided that any officers whose promotion or confirmation is delayed being reasons to his being on deputation outside his range or district shall, on being promoted or confirmed, regular the seniority which he originally held vis-à-vis any officers promoted or confirmed before him during his deputation.
21. **Police Rule 13.18** regulate probationary period of promotion which provides that all Police officers promoted in rank shall be on probation for two years, and on conclusion of the probationary period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether the officer should be confirmed or reverted.
22. From the rules quoted above, it is very much clear that seniority lists and promotion lists are two separate things which cannot be amalgamated with each as is presently done in the CPO because at present promotion list "F" is considered as a seniority list which is wrong and against the rules. The Supreme Court has also held so in its various Judgments like Azmat Ghafoor, case.
23. For all directly appointed officer three years probationary period(except temporary) is provided (Police Rule 12.8) while for all other officers promoted from one rank to another, two years' probation period is provided in Rule 13.18. After completion of probation period the officers have to be confirmed, which means that confirmation for officer promotion has to be made in each rank and confirmation dates of the officer shall vary from rank to rank. As envisage in Rule 12.2(3) that seniority in case of upper subordinate will be reckoned in the first instance from the date of first appointment, officer promoted from lower rank will be considered senior to the persons appointed directly on the same date, while seniority shall finally be settled by dates of confirmation.
24. There is no ambiguity in the rules. Under the rules discussed above, seniority of the officer shall be finally settled by dates of confirmation in each rank and to assign seniority in the rank of DSP from the date of first appointment as ASI is totally against the rules as applied in case of DSP Bakhtzada and DSP Amjad Khan. In each rank date of promotion and confirmation shall be considered for assigning seniority to them. By giving seniority to a DSP from the date of appointment as ASI would amount to


ATTESTED
To Be True Copy

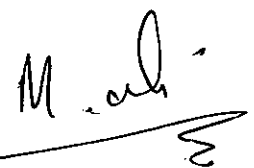
bypass all the above mentioned rules which regulate promotion/appointment. Police Officer cannot be treated as civil servant, as Special Rules other than General Service Rules applicable to the Civil Servants has been framed, under which Police Officers cannot be treated at par with the Civil Servant. General Rules of Civil servant can only be applied on Police Officer when there is no such provision in Police Rules in respect of any issue/point. The Supreme Court of Pakistan in its Judgment reported in PLD 1985-Supreme Court Page 159, has elaborated in detail this aspect of Police as well as Civil Servant.

25. Under rule 12.2 (3) the prescribed criteria mention for the confirmation in upper grade; *“who had a good record of service, well qualified had earned commendation certificate and cash awards and never earned any adverse report in his/her carrier and also had qualified requisite condition of passing prescribed training course which was prerequisite for confirmation as sub inspector of police was entitled to be confirmed”*
26. In the light of rules and principles laid down by the **Supreme Court of Pakistan** in its judgement (2018 SCMR 1218), the out of turn promotion is declared as unconstitutional and cannot be extended to apply to retrospectively on the cases and also the supreme court has sort the complete report from the police of all provinces and further directed that those officers who got out of turn promotion, shall be revert to their previous position. Moreover, the honorable supreme court has directed to the DPC/board as the case may be, shall be immediately held in compliance report be submitted to the registrar of this court for our perusal and chamber within a period of one month and in case of non-compliance of the august supreme court is amount to contempt of court.
27. It is paramount in the interests of justice, that the legal rights and privileges of the Applicants are protected by granting them a full and fair opportunity to present their cases in order to allow to establish a flawless opinion and reach a consummate decision based on germane facts and law.
28. The applicant is also requesting for **personal hearing to the worthy IGP** as per rules.

Prayer, in view of above paras and grounds it is submitted that the impugned seniority list of DSP BS-17 of Khyber Pakhtunkhwa Police Notification vide No. 840/SE-I, Dated: 30-04-2020, may kindly be set aside and revised to the previous Seniority List of DSsP BS-17 issued vide notification No. 347/SE-1, dated 19.03.2019, keeping in view, the seniority in confirmation as Assistant Sub Inspector, Sub Inspector, Inspector and entry to the promotion lists D, E & F as provided and maintained in the law, rules and norms of justice.



(TAUHEED KHAN)
Acting SP/Special Branch
South Regions

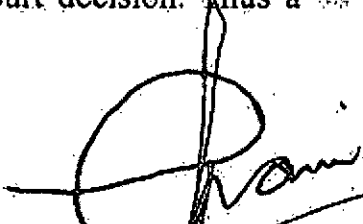


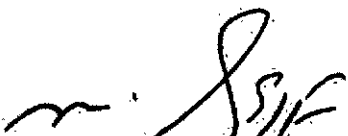
ATTESTED

To Be True Copy


appointment/promotion as ASI. The Provisional Seniority List of DSsP issued vide No. S/292-328/13, dated 11.01.2013 is set aside and the seniority list of DSsP as stood on 20.03.2012 is restored in its original shape by giving seniority to the DSP/Muhammad Idrees and Younas Javed Mirza as per court decision. Thus a final seniority list of DSP be issued according to Police Rules.

42 C

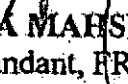

(IHSAN GHANI)
Provincial Police Officer,
Khyber Pakhtunkhwa,
(Chairman)


(MIAN MUHAMMAD ASIF)
Addl: IGP/Ops & Trg: KPK
Member


(KHALID MASOOD)
Addl: IGP/HQrs: KPK
Member



(SYED AKHTAR ALI SHAH)
PPM/QPM
Addl: IGP/Special Branch, KPK
Member

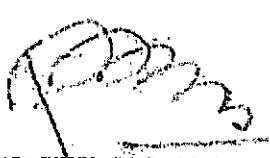

(LIAQAT ALI KHAN)
CCPO, Peshawar
Member


(AMIR HAMZA MAHSUD)
Addl: IGP/Commandant, FRP, KPK
Member


(MUHAMMAD MASOOD KHAN AFRIDI)
Addl: IGP/Investigation, KPK
Member


(AWAL KHAN)
DIG/HQrs:
Member


(SYED FIDA HASSAN SHAH)
AIG/Establishment
Member


(MUHAMMAD FAYYAZ)
AIG/Legal
Member


ATTESTED
To Be True Copy

42D



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

No. 1001-1100 J.G.B. dated

Peshawar the 10 / 01 / 2019


NOTIFICATION

In compliance with the judgement of Supreme Court of Pakistan dated 13.03.2018, and recommendations of the committee constituted for the purpose, the following Standing Orders/Instructions which extend the incentives for promotion and confirmation to the Cadet Law Instructors and Drill Instructors serve in the Police Training College Hangu and other Training Institutions amount to out of turn promotion are hereby withdrawn:-

1. Standing Order No. 11/1987.
2. Letter No. 20710-60/1995.
3. Standing Order No. 07/2003.
4. Standing Order No. 17/2014.
5. Standing Order No. 05/2016.

**-Sd/-
SALAH-UD-DIN KHAN
Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar**

Copy of above is forwarded to all Heads of Police Offices in Khyber Pakhtunkhwa for information and further necessary action.


**(SADIQ BALOCH) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.**

M. Baloch
ATTESTED
To Be True Copy

Ann - VI

(43)



**OFFICE OF THE COMMANDANT, ELITE FORCE
KHYBER PAKHTUNKHWA, PESHAWAR.**



No. 4804 AB

Dated 03/06/2020

To : The Additional Inspector General of Police,
Headquarters, Khyber Pakhtunkhwa, Peshawar.

Subject: MINUTES OF THE MEETING OF COMMITTEE HELD ON 18/03/2020
IN CONFERENCE ROOM SQUAD UNDER THE CHAIRMANSHIP OF
COMMANDANT ELITE FORCE, KHYBER PAKHTUNKHWA
PESHAWAR.

Memo:

Please refer to your office letter No. 679/CP/19/Committee/80, dated 10.03.2020,
on the subject cited above.

It is submitted that minutes of the meeting is enclosed herewith as desired please.

[Signature]
Commandant Elite Force,
Khyber Pakhtunkhwa, Peshawar.

Handwritten notes:
AIG's statement
for reviewing the list of DEP in
the light of report of
the committee constituted
for the purpose of
pl. put up to
the committee has
to the along
15/06/20

Scanned by CamScanner

[Signature]
ATTESTED
To Be True Copy

Better copy of
page - (47)

OFFICE OF THE COMMANDED ELITE FORCE
KHYBER PAKHTUNKHWA, PESHAWAR

No. 484/EP/

Dated 04/04/2020

To

The additional inspector General of Police
Headquarters, Khyber Pakhtunkhwa

Subject: MINUTES OF THE MEETING OF COMMITTEE HELD ON
18/03/2019 IN CONFERENCE ROOM NOJI UNDER THE
CHIRMANSHIP OF COMMANDANT ELITE FORCE
KHYBER PAKHTUNKHWA

Memo:

Please refer to your office letter No. CPO/CPB/Committee/80, dated
10.03.2020 on the subject cited above

It is submitted of the meeting is enclosed herewith its desired please.

Sd/-
(Muhammad Seed)
Commandant Elite force
Khyber Pakhtunkhwa

M. Seed

ATTESTED
To Be True Copy

44

MINUTES OF COMMITTEE MEETING

1. Consequent to CPO Notification No. CPO/E-II/Revised Seniority/61, dated 12.02.2020 wherein a revised seniority list of 21 officers of Malakand Region (hereinafter referred to as the Affectees) was issued whereof some were placed senior and ahead of the Petitioners in List 'F', the later feeling aggrieved impugned the said notification severally through their written representations and prayed for setting aside the same. In order to settle the issue in accordance with law and to look into the said petitions a Committee headed by the Commandant Elite Force KP was constituted vide Addl: Inspector General of Police, HQrs: order No. CPO/CPB/Committee/80 dated 10.03.2020 with three additional members comprising of Commandant FRP, AIG Establishment & AIG Legal CPO.

The Committee accordingly under its Chairman held a few meetings, summoned both the Affectees, represented by DSP Amjad Ali, CSO to the CM, KP and DSP Bakht Zada Khan and Petitioners, represented through DSP Aslam Nawaz, Acting SP/Traffic Peshawar and DSP Nisar Ahmad Khan, Acting DPO/Orakzai in person and opportunity furnished to them to plead their case in detail.

2. Brief facts leading to the instant petitions are as follow:

That the "Affectees" in Malakand Region were enlisted in the rank of assistant sub inspectors through initial recruitment and on promotion but were not confirmed after the completion of mandatory period of probation as per statutory requirement. On the contrary the petitioners mostly appointed through initial recruitment later to some of these "Affectees" were confirmed upon successful completion of their probationary period as per law. Resultantly, the affectees stood junior to them when they were considered for inclusion in the "F" List. Pertinent to mention that the affectees feeling aggrieved agitated what they called an ex-facie injustice at various forums- both departmental and judicial- and after a long struggle their case was revisited afresh by the Department. The Regional Police Officer Malakand Region finally accepted their request and notified the revise seniority in list 'E' vide no. 11644-68/E, dated 30/10/2019 which later on was also endorsed by the Central Police Office with a revised seniority in List "F" vide order stated as above.

The revised seniority in "F" List shows three different category of officers who were given the benefit; the first being the probationary ASIs enlisted in 80s prominently figured at serial no. 1, 2 & 3 however some were recruited later in the 90s, the second category was found to be that of promotee officers and yet the third one is that who were given the benefit under Standing Order # 11/1987 which are thirteen (13) in number.

3. Before embarking upon the merit of the case it is pertinent to dilute upon the main points the petitioners have made the basis of their plea. The petitioner's ground that seniority is reckoned from the date of confirmation in the substantive rank is absolutely correct and in accordance with the civil services laws in vogue in this country. Whereas the Petitioners after completion of probation period was confirmed in accordance with law, some of the affectees e.g. at serial no. 1, 2, & 3 of the revised list F were not treated in like manner and after the expiry of the said probationary period were neither discharged nor confirmed as per the mandatory dictates of law on the subject. Confirmation is always made against substantive rank and there is no room for confirmation against a temporary or adhoc position. In the instant case these affectees were appointed on regular basis thereby meaning that the appointment was in prescribed manner and a permanent vacancy existed as such. Again the petitioner's relied on Rule 17 of the APT Rules 1989 which states that if a senior officer is superseded and a junior officer is promoted than the officer so promoted shall stand senior to the former but this shall not include a case where the senior officer is deferred for want of record etc. Here the learned petitioners faltered by misreading the true meaning of the provision as these affectees haven't been superseded in the first place and secondly the proviso to the Rule clearly stipulates that it shall not include the case where an officer is being deferred on account of incomplete record or it is occasioned on account of red tape, bureaucratic checks or departmental luxury.

Scanned by CamScanner

M. Ali
ATTESTED
To Be True Copy

45

It is also pertinent to reproduce the fundamental rules on the subjects of probation, confirmation and seniority which exist in Police Rules, The KP, Civil Servant Act 1973 and the KP, Appointment, Promotion and Transfer Rules, 1989. Police Rules 128 says that inspectors, sergeants, sub-inspectors and assistant sub-inspectors who are directly appointed shall be considered to be on probation for three years and are liable to be discharged at any time within the period of their probation if they fail to pass the prescribed examinations including the riding test, or are guilty of grave misconduct or are deemed for sufficient reasons, to be unsuitable for service in the Police. Similarly P.R.13.18 provides that all Police Officers promoted in rank shall be on probation for two years, provided that the appointing authority may, by a special order in each case, permit periods of officiating service to count towards the period of probation. P.R. 19.25 further says that inspectors, sub-inspectors and assistant sub-inspectors, who are directly appointed, shall be deputed to the Police Training School to undergo the course of training laid down for such officers in the police training school manual and are liable to discharge if fail to pass the prescribed examinations or are badly reported on provided that on the termination of the probationary period the superintendent of police is required to submit a report to the deputy inspector general under a clause of the same rule stating therein the conduct and working of the officer and with recommendation whether the officer should or should not be confirmed.

5. From the foregoing it is evident that officers appointed through initial recruitment or promotion shall be on probation for a period of three (03) years and two (2) years respectively. The contents of these provisions also reveals that the competent authority has got the powers to dispense with the services of the probationary during the probation period and even after its completion if the probationary officer fell short of the required and set standards. However, the special law e.g. the police rules 1934 do not guide us as to what will happen if neither probationary period is terminated nor the services of the officer are being confirmed after the completion of mandatory probationary period. It is an established proposition of jurisprudence that when a subject is being left over by special law than recourse must be had to the general law. In view of this "The KP, Civil Servant Act, 1973 and The "KP Appointment, Promotion and Transfer Rules 1989" which is the general law on the subject may be resorted to, in order to clarify the mist and guide us to the right place.

6. Section-6 (1) of the KP, Civil servant Act 1973 says that all initial appointment shall be on probation as may be prescribed and vide sub-section 2 all appointment made through promotion or transfer shall also be on probation as may be prescribed. According to Rule 15 (3), of the Khyber Pakhtunkhwa Appointment, Promotion and Transfer (APT) Rule 1989, that upon successful completion of the probationary period the appointing authority shall by specific orders terminate the probationary period of the officer or official concerned within two months after the expiry of the probationary period provided further if no specific order regarding the termination of the probation period of the official concerned is issued within two months, the period of probation shall be deemed to have been extended.

Section 7 of the Civil Servant Act further provides that a person appointed on probation shall on satisfactory completion of his probation shall be eligible for confirmation in his service or as the case may be a post as may be prescribed. Rule 16 of KP, Appointment, Promotion and Transfer (APT) Rules 1989 says that after satisfactory completion of the probation period a civil servant shall be confirmed provided he holds a substantive post.

7. Section 8(2) of the KP, Civil Servant Act, 1973 provides that subject to the provisions of sub section (1) the seniority of a civil servant shall be reckoned in relation to other civil servants belonging to the same service or cadre, whether serving the same department or office or not as may be prescribed. Rule 17 (1) of the APT Rules 1989, prescribed that the seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

(u) In the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission (or as the case may be, the Departmental Selection Committee) provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a latter selection

Scanned by CamScanner

M. uli.
ATTESTED
To Be True Copy

The Police Rules 12.2(3) also says that seniority in case of upper subordinates shall be reckoned in the first instance from the date of first appointment, officer from lower rank will be considered senior to the persons appointed directly on the same date, while seniority shall finally be settled by dates of confirmation.

8. The cumulative effects of the foregoing provisions of Police Rule 1934 read with Khyber Pakhtunkhwa Civil Servant Act 1973 and Khyber Pakhtunkhwa Appointment, Promotion and Transfer (APT) Rule 1989 manifestly indicate that officers appointed either through initial recruitment or by promotion or transfer shall be on a mandatory period of probation and the competent authority shall not be barred from dispensing with their services if in his opinion the probationary fell short of the required standards. However, if no adverse action is being taken during the probationary period or afterwards the officers is deemed to have successfully completed the said probationary period which shall entitle him for confirmation in accordance with law.

9. In the instant case the affectees especially who were recruited ASI in the 80's through initial recruitment and whose names reflected on the CPO revised "F" list at serial no. 1, 2, & 3 were not confirmed upon successful completion of probationary period in utter disregards to the law mentioned in great length on the subject as above. Since, these officers were appointed in prescribed manner and against substantive posts as such omitting their names from confirmation in accordance with law was a priori unjust with snowball effects depriving them of their right of inclusion in the "F" list at the appropriate time. Due to this anomaly which can hardly be imputed to the affectees, their junior including the present petitioners were able to be senior to them in spite of the fact that they were appointed many years after these affectees'.

The case of those who were given the benefit under the S.O 11/87 is different and needs to be isolated from the first three officers. No standing order had overriding authority over any rule or act of the parliament to say the least and to begin with. The said Standing Order is already being declared null and void by the Apex Court and any benefit accrued there under is equally devoid of legal norms and contrary to existing law on the subject. The matter had been dealt with in great detail in a number of judgments of the higher judiciary given that the same Standing Order was in conflict with the fundamental human rights of equality before law and equal protection of law besides violating the main provisions of Police Rules 1934 enshrined in Chapter 13 therein.

The seniority of the promotee officers vis a vis the direct recruited officers to be settled in accordance with Police Rules 12.2(3) which say that seniority in case of upper subordinates shall be reckoned in the first instance from the date of first appointment, officers from lower rank will be considered senior to the persons appointed directly on the same date, while seniority shall finally be settled by dates of confirmation.

10. Upon putting the two cases in juxtaposition it transpires that the relevant laws and established principles on probation, confirmation and seniority were not adhered to in case of the affectees in Malakand Range whereas their counterparts and the present petitioners elsewhere had relatively got better and fair chance of career progression. Further P.R 13.15 cast a duty on the district superintendent of police to forward the names of suitable sub inspectors to the office of the deputy inspector general of police not later than 15th of January each year who are eligible to be promoted to the rank of inspectors and the later shall if agrees to the recommendations send it to the CPO with his own recommendations not later than October the same year. Such of the officers recommended as the Inspector General may consider suitable shall be admitted to promotion list "F". It is surprisingly shocking that no recommendations emanated from Malakand Range for a considerable amount of time which grossly affected the career progression of the first few affectees vis-a-vis the petitioners. The non compliance of this statutory duty proved catalyst in depriving the affectees from getting their seniority from the day it was due to them on the one hand and that they were penalized for something which could not be of their making on the other.

11. The jurisprudence developed in this country, finding expression in tons of higher courts judgments point to the fact that a civil servant could not be penalized in terms of depriving of lawful seniority should the same otherwise accrued to him but being delayed

M. Ali
ATTE
To Be Tr

due to bureaucratic checks, red tape or departmental luxury. Amidst clear provisions stipulated in Rule 17 (1) of the APF Rules 1989, that the seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission (or as the case may be, the Departmental Selection Committee) provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; very little or no room exist whereby the petitioners could lay a valid claim of being senior to the first three affectees given that they were appointed many years after them. The underlying principle of seniority leading to promotion is seniority cum fitness which is guaranteed by P.R 13.1 and had consistently being ignored at all level.

12. It is also not out of place to mention that affectees of the 80s batch challenged the apparent injustice meted out to them before the Khyber Pakhtunkhwa Civil Services Tribunal Camp Court Swat wherein their plea of counting the probationary period towards regular service was accepted, hence they can rightfully claim seniority from the day they were inducted in that service. Similarly, 19 affectees of Malakand Region subsequently also agitated the same issue before the Peshawar High Court, Mingora office Darul Quzza, Swat, wherein the Honourable High Court without going into the merit of the case disposed off the said petition in terms of converting it into a departmental appeal and sent it to the worthy Provincial Police Officer, Khyber Pakhtunkhwa with direction to consider the application of the petitioners in respect of placement of their names at the appropriate place in the seniority list reckoned it to be from the date of their promotion to the cadre of ASI.

CONCLUSION

In view of what had been discussed in great length in the foregoing paragraphs, this Committee concludes that the petitioner pleas to the extent of seeking to set aside the impugned notification against the three officers highlighted at serial no. 1, 2, & 3 are devoid of any cogent, material substance and denuded of legal mainstay. The only prerequisite for confirmation in the rank of the sub inspector according to Police rules 12.10 is that the officer be tested for one year in an independent charge of a police station or any specialist assignment in a district other than his domicile and that the DIG is fully competent under P.R 13.11 to add or remove any name from the E list at any time. In view of this the DIG MKD was in his lawful province to review the case of the affectees afresh and decide in accordance with law. The RPO Malakand and the subsequent notification of the CPO correcting a long standing ex facie wrong by conferring the rightful seniority on the first three affectees of Malakand Region is found to be in accordance with law and established principles of fair play, good conscious and justice.

The cases of those who got the benefit under S.O 11/87 does not stand on the same footing as it had been declared ultra vires of constitution and law and also de-notified by the CPO just recently as such any benefit accruing under an illegal S.O is equally illegal, unlawful and denuded of lawful consequences.

Given the nature of discussion made in great length in the preceding paragraphs the following situation emerges:

- (a) The first three affectees are senior than petitioners given the existing rules, already dilated upon in the opening part of this report. Looking into true perspective of the case it is discerned that they have been the victim of departmental inertia which was further aggravated by the supine attitude meted out to them at different levels in response to their quest of making amend the wrong occasioned at the early stage of their career for no fault of theirs.
- (b) The beneficiary under Standing Order No. 11/87 having got no right to be placed senior to their batch mates rather their correct place is with the former therefore any undue favour resulting in putting them senior either to their batch mates or the petitioners is violative of law and of no legal effects.
- (c) The promotees case needs to be dealt with in accordance with clear provisions on probation, confirmation and subsequent seniority leading to promotion. Their case be

M. J.
 ATTESTED
 To Be True Copy

48

juxtaposed with that of the petitioners and the date of confirmation by the guiding principle in determining their seniority vis a vis the petitioners.

(d) The remainder of the directly recruited ASAs if appointed later in point of time stands junior to the petitioners.

RECOMMENDATIONS

- I. The instant petitions to the extent of seeking seniority against the officers at serial no. 1, 2, & 3 be filed requiring no further action.
- II. The case of S.O 11/87 beneficiaries needs to be sent back to the IFC MKD for assigning them their rightful place in seniority list alongside their respective batches.
- III. The plea of the petitioners vis a vis the remaining officers needs to be reviewed and looked into the relevant provisions of law broadly incorporated in this report.
- IV. Immediate, substantial and expert measures may be taken for convening meeting of the Departmental Selection Board to consider the promotion cases particularly of those officers who were given relief by the competent legal forum as well as by the Department as some are on the verge of retirement.
- V. The cases of all those officers may also be looked into by the Range DDCs who were ignored or omitted from confirmation at the right and appropriate timing on account of red tape, technicalities and bureaucratic checks leading to deprivation of their lawful right. The broad principles set out in this report may be considered for deciding all such cases.
- VI. Notices to all the officers who may likely to be affected by this report should be notified and sufficient opportunities given to represent themselves in accordance with law.

Commandant,
FRP, Khyber Pakhtunkhwa
(Member)

AIG/Establishment,
Khyber Pakhtunkhwa
(Member)

AIG/Legal,
Khyber Pakhtunkhwa
(Member)

CPD Peshawar
(Member)

Commandant
Elite Force, Khyber Pakhtunkhwa
(Chairman)

Scanned by CamScanner

M. ali
ATTESTED
To Be True Copy

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

49

No. CPO/CPB__97_

Dated Peshawar __15__ April 2020

To:

The Capital City Police Office
Peshawar.

All Regional Police Officers in Khyber Pakhtunkhwa

Subject: **REVICED CONFIRMATION/ADMISSION TO LIST "E"**

Memo:-

Kindly refer in the subject cited above and to state that Regional Police officer Malakand issued revised seniority of SIs vide his police Notification vide No.11644-48/1; dated 30.10.2019. Consequently meeting of DPO was held on 31.01.2020 at CPO and the Competent Authority fixed seniority of officers in the light of Rule 12.2(3) Police Rules 1934 with their colleagues in List "I" in the rank of Inspectors and Deputy superintendent of Police as per revised confirmation of Malakand region.

In the meanwhile, twenty three (23) Police Officers of other region/units have submitted representation against the above notification.

In this regard, the Competent Authorities constituted committee to deliberate upon the representations of affected officers, scrutinize the cases and submit its report. The committee submitted its minutes of the committee report to competent authority vide memo No4844/1;1' dated 07.04.2020 (copy attached).

Upon perusal of the minutes of the meeting, the Competent Authority has directed that the following tasks may please be completed within seven (7) days and report be sent to this office at the earliest:-

- A. *"the cases of all those officers may also be looked into by the Range DIG's who were ignored or omitted from confirmation at the right and appropriate timing on account of red tape, technicalities and bureaucratic checks leading to deprivation for deciding all such cases"*.
- B. *"Notices to all the officers who may likely to be affected by this report should be malafide and sufficient opportunities given to represent themselves in accordance with law"*.

Matter may please be assigned top priority.

(DR.ZAHIDULLAH)PSP
APG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa
Peshawar.

Endst: No. and dated even

Copy forwarded to the:-

1. Addl: Inspector General of Police HQrs: Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police Khyber Pakhtunkhwa Peshawar.
3. COS to worthy Inspector General of Police Khyber Pakhtunkhwa Peshawar.



FAX

Aut - VII

49

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

No. CPO/CPW/ 97

Dated Peshawar 15 April 2020

To

The Capital City Police Officer,
Peshawar.

All Regional Police Officers in Khyber Pakhtunkhwa.

Subject: REVISED CONFIRMATION/ADMISSION TO LIST "E"

Memo:-

Kindly refer to the subject cited above and to state that Regional Police Officer, Malakand issued revised seniority of SIs vide his office Notification vide No. 11644-48/E dated 30.10.2019. Consequently, a meeting of DPC was held on 31.01.2020 at CPO and the Competent Authority fixed seniority of the officers in the light of Rule 12.2(3) of Police Rules 1934 with their colleagues in List "E" in the ranks of Inspectors and Deputy Superintendent of Police as per revised confirmation of Malakand Region.

In the meanwhile, twenty three (23) Police Officers of other Regions/Units have submitted representations against the above notification.

In this regard, the Competent Authority constituted a committee to deliberate upon the representations of affected officers, scrutinize the cases and submit its report. The Committee submitted its minutes of the committee report to the competent authority vide memo No 4844/EF dated 7-04-2020 (copy attached).

Upon perusal of the minutes of the meeting, the Competent Authority has directed that the following tasks may please be completed within seven (7) days and report be sent to this office at the earliest:-

A. "The cases of all those officers may also be looked into by the Range DIGs who were ignored or omitted from confirmation at the right and appropriate timing on account of red tape, technicalities and bureaucratic checks leading to deprivation of their lawful right. The broad principles set out in this report may be considered for deciding all such cases".

B. "Notices to all the officers who may likely to be affected by this report should be notified and sufficient opportunities given to represent themselves in accordance with law".

Matter may please be assigned top priority.

(DR. ZAFAR ULLAH) PSP
Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. and dated even
Copy forwarded to the:-

1. Addl: Inspector General of Police, C/Os: Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
3. C/Os to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Scanned by CamScanner

ATTESTED

T.

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

50

No. CPO/CPB_98__

Dated Peshawar ___15___ April 2020

To:

The Regional Police Office
Malakand.

Subject: REVISED CONFIRMATION/ADMISSION TO LIST "E"

Memo:-

Kindly refer in the subject cited above and to state that Regional Police officer Malakand issued revised seniority of SIs vide his police Notification vide No.11644-48/1; dated 30.10.2019. Consequently meeting of DPC was held on 31.01.2020 at CPO and the Competent Authority fixed seniority of officers in the light of Rule 12.2(3) Police Rules 1934 with their colleagues in List "I" in the rank of Inspectors and Deputy superintendent of Police as per revised confirmation of Malakand region.

In the meanwhile, twenty three (23) Police Officers of other region/units have submitted representation against the above notification.

In this regard, the Competent Authorities constituted committee to deliberate upon the representations of affected officers, scrutinize the cases and submit its report. The committee submitted its minutes of the committee report to competent authority vide memo No4844/1;1' dated 07.04.2020 (copy attached).

Upon perusal of the minutes of the meeting, the Competent Authority has directed that the following tasks may please be completed within seven (7) days and report be sent to this office at the earliest:-

"The case of S.O 11/87 beneficiaries need to be sent back to the RPO Malakand for assigning them their rightful place in seniority list alongside their respective batches".

Matter may please be assigned top priority.

(DR.ZAHIDULLAH)PSP
APG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa
Peshawar.

Endst: No. and dated even

Copy forwarded to the:-

1. Addl: Inspector General of Police HQrs: Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police Khyber Pakhtunkhwa Peshawar.
3. COS to worthy Inspector General of Police Khyber Pakhtunkhwa Peshawar.



FAX

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

30

No. CPO/CPW 98

Dated Peshawar 15 April 2020

To: The Regional Police Officer,
Malakand.

Subject: REVISED CONFIRMATION/ADMISSION TO LIST "E"

Memo:-

Please refer to your office Notification No. 11644-48/E dated 30.10.2019 on the subject cited above.

Kindly refer to the subject cited above and to state that Regional Police Officer, Malakand issued revised seniority of SIs vide his office Notification vide No. 11644-48/E dated 30.10.2019. Consequently, a meeting of DPC was held on 31.01.2020 at CPO and the Competent Authority fixed seniority of the officers, in the light of Rule 12.2(3) of Police Rules 1954 with their colleagues in List "F" in the ranks of Inspectors and Deputy Superintendent of Police as per revised confirmation of Malakand Region.

In the meanwhile, twenty three (23) Police Officers of other Regions/Units have submitted representations against the above notification.

In this regard, the Competent Authority constituted a committee to deliberate upon the representations of affected officers, scrutinize the cases and submit its report. The Committee submitted its minutes of the committee report to the competent authority vide memo No 4844/E dated 7-04-2020 (copy attached).

Upon perusal of the minutes of the meeting, the Competent Authority has directed that the following task may please be completed within seven (7) days and report be sent to this office at the earliest:-

"The case of S.O 1187 beneficiaries needs to be sent back to the RPO Malakand for assigning them their rightful place in seniority list alongside their respective batches".

Matter may please be assigned top priority.

(DR. ZAHID ULLAH) PSP
Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. and dated even

Copy forwarded to the:-

1. Addl. Inspector General of Police, HQrs: Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
3. COS to Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

U1 /
WUG
RPO Malakand
Sajjad 15/4/2020

Scanned by CamScanner

ATTESTED
To Be True Copy

OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND
SAIDU SHARIF, SWAT.

Ph: 0946-9240381-82 & Fax No. 0946-9240390

Email; digmalakand@yahoo.com

(51)

No. _____/E, dated Saidu Sharif the _____/_____/2020

To:

The Inspector General of Police
Khyber Pakhtunkhwa Peshawar

Subject:

REVISED CONFIRMATION/ADMISSION TO LIST "F:

Memorandum:

Kindly refer CPO, Peshawar memo: No. CPO/CPB/98, dated 15/4/2020 on the subject.

Notification No. 11644-68/E, dated 30/10/2019 issued by the office regarding revised Confirmation/Admission to List-E of the officers from Sr. No. 4 to Sr. 26 is hereby withdrawn/ be kept intact as their seniority has been approved by the committee comprising of commandants, Elite force, Chairman and others 4 members in its meeting held on 18/03/2020 at CPO level.

Regional Department Committee was constituted to probe and collect guidance from CPO, Peshawar regarding SO No. 11/87 as to whether the same has been declared illegal in the light of Judgment dated 03/05/2018 Supreme Court of Pakistan followed by IGP Khyber Pakhtunkhwa, Peshawar notification no. 1001-1100/GB dated 10/01/2019 and order No. 1101-1200/GB, dated 17/01/2019 and implemented in the whole province of otherwise the committee will also scrutinize and check the seniority of officers from (Sr. No. DSP Muzakir Shah to Sr. 26 DSP Ghulam Sadiq) and other confirmed Sub Inspector of Malakand Region and will report within shortest possible period for further course of legal action.

Submitted please.

SD/-
Regional Police Officer,
Malakand Region, Swat

SENIORITY LIST OF DSsP BS-17 OF KHYBER PAKHTUNKHWA POLICE

No. 840

/SE-I, The Seniority List of DSsP BS-17 of Khyber Pakhtunkhwa Police is hereby published for information to all concerned.

Dated, 30,04,2020

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
1.	Mr. Bakht Zada	15.02.1962	Buner	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	Revised seniority was granted vide Notification No.CPO/E-II/Revised Seniority/142/E-II dated 29.04.2020
2.	Mr. Amjid Ali	18.03.1963	Swat	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	Revised seniority was granted vide Notification No.CPO/E-II/Revised Seniority/142/E-II dated 29.04.2020
3.	Mr. Arif Javed	08.02.1964	Haripur	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	Appointed as (SP BS -18) on Acting Charge Basis vide Govt: of Khyber Pakhtunkhwa Establishment Department Notification No. SO (E-I) E&AD/2-4/2019, dated 28 th January 2019.
4.	Mr. Aman Ullah	09.07.1964	Bannu	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
5.	Mr. Tariq Mehmood	28.04.1965	Abbottabad	BA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	Appointed as (SP BS -18) on Acting Charge Basis vide Govt: of Khyber Pakhtunkhwa Establishment Department Notification No. SO (E-I) E&AD/2-4/2019, dated 28 th January 2019.
6.	Mr. Ijaz Ahmed	15.06.1966	Abbottabad	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
7.	Mr. Janas Khan	10.02.1965	Abbottabad	BA	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
8.	Mr. Mukhtiar Ahmad	04.02.1969	Abbottabad	FA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
9.	Mr. Muhammad Suleman	28.07.1970	Mansehra	MA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
10.	Mr. Asif Gohar	07.08.1964	Mansehra	10 th	20.01.2011	Notification No S/432/2011 dt: 20.01.2011	
11.	Mr. Aamir Shahzad	09.08.1968	Peshawar	MA	30.06.2011	Notification No S/3887/2011 dt: 30.06.2011	
12.	Mr. Amir Muhammad Khan	07.01.1970	Buner	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
13.	Mr. Sanaullah	10.01.1969	Lakki	BA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	Revised seniority was granted vide Notification No.CPO/E-II/Revised Seniority/ 33, dated 27.01.2020.
14.	Mr. Gul Naseeb	09.11.1968	Bannu	F.Sc	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
15.	Mr. Waqar Ahmad	03.01.1968	Nowshera	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
16.	Mr. Nasir Khan	20.12.1972	Peshawar	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No.CPO/E-II/Revised Seniority/ 34, dated 27.01.2020.
17.	Mr. Muhammad Shafiq	13.01.1963	Bannu	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
18.	Mr. Muhammad Arif	10.03.1969	Peshawar	MA/LLB	19.03.2012	Notification No S/6949/2012 dt: 25.09.2012	
19.	Mr. Tahir ur Rahman	28.02.1969	Haripur	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
20.	Mr. Darvesh Khan	14.06.1962	Mardan	MA/LLB	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
21.	Mr. Tauheed Khan	20.10.1963	DIKhan	BA	19.03.2012	Notification No S/1957/2012 dt: 19.03.2012	
22.	Mr. Salah-ud-Din	15.01.1970	Tank	MA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
23.	Mr. Noor Jamal	10.01.1966	Mardan	MA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
24.	Mr. Muhammad	22.04.1964	Bannu	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
25.	Mr. Farid Habib	02.11.1968	Peshawar	MA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
26.	Mr. Nisar Ahmad	02.11.1973	Charsadda	BA	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
27.	Mr. Aslam Nawaz	01.03.1972	Bannu	MA/LLB	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	

ATTESTED
To Be True Copy

[Handwritten signature]

52

[Handwritten signature]

55

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
28.	Mr. Tariq Iqbal	13.04.1974	Peshawar	M.Sc/LLB	31.03.2012	Notification No. S/2383/2012 dt: 31.03.2012	
29.	Mr. Qaid Kamal	01.01.1963	Charsadda	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
30.	Mr. Banaras Khan	05.01.1962	Nowshera	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
31.	Mr. Shafiullah	01.04.1971	D.I.Khan	MA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
32.	Mr. Munir Hussain	30.05.1966	Mansehra	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
33.	Mr. Tahir Iqbal	20.01.1969	Haripur	B.Sc	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	Revised seniority was granted vide Order No. 909/E-II dated 12.12.2018
34.	Mr. Qamar Hayat	08.04.1971	Haripur	BA	07.11.2012	Notification No. S/8083/2012 dt: 07.11.2012	
35.	Mr. Zulfiqar Khan Jadoon	15.06.1963	Abbottabad	BA	25.03.2013	Notification No. S/1791/2013 dt: 25.03.2013	
36.	Mr. Nazir Ahmad	02.02.1970	Abbottabad	MA/B.Ed	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
37.	Mr. Saeed Akhtar	02.02.1971	Haripur	M.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
38.	Mr. Muhammad Ayaz	03.03.1975	Abbottabad	B.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
39.	Muhammad Jamil Akhtar	22.02.1977	Haripur	B.Sc	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
40.	Mr. Falak Niaz	01.04.1965	Swabi	MA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
41.	Mr. Ishtiaq Ahmad	01.11.1971	Lakki	BA	07.11.2012	Notification No. S/8083/12 dt: 07.11.2012	
42.	Mr. Iftikhar Shah	30.04.1966	Mardan	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.575/CPB dated 19.05.2017
43.	Mr. Shaukat Ali	05.03.1971	Swabi	B.Sc	30.11.2012	Notification No. S/8772/2012 dt: 30.11.2012	
44.	Mr. Abdul Samad	14.04.1969	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
45.	Mr. Mushtaq Ahmad	15.03.1970	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
46.	Mr. Sajjad Ahmad	01.04.1968	Swabi	MA	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
47.	Mr. Abdur Rashid Marwat	30.03.1963	Lakki	10 th	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
48.	Mr. Muzamil Shah	08.03.1972	Swabi	M.A	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
49.	Mr. Niaz Muhammad	11.02.1971	Swabi	MA/LLB	25.03.2013	Notification No. S/1791/13 dt: 25.03.2013	
50.	Mr. Shah Hassan	01.05.1968	Mardan	MA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
51.	Sajjad Ahmad Sahibzada	02.02.1971	Swabi	BA	08.04.2013	Notification No. S/2119/13 dt: 08.04.2013	
52.	Mr. Nazir Khan	18.10.1970	Mardan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
53.	Mr. Abdul Hai	01.08.1972	D.I.Khan	MA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
54.	Mr. Saleem Aman Ullah	23.03.1970	Peshawar	FA	19.07.2013	Notification No. S/2119/13 dt: 19.07.2013	
55.	Muhammad Javed	03.06.1963	Mansehra	10 th	27.10.2015	Notification No. 4029/SE-I dt: 27.10.2015	Revised seniority was granted vide Notification No. 110/SE-I dated 17.01.2019. Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
56.	Mr. Zia Hassan	01.11.1974	D.I.Khan	M.A/ Pol	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
57.	Mr. Abdus Salam Khalid	24.06.1976	Lakki	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
58.	Arbab Shafiullah Jan	09.10.1966	Peshawar	BA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
59.	Mr. Rafiqul	12.03.1968	Peshawar	FA	02.01.2014	Notification No. S/20/14 dt: 02.01.2014	
60.	Mr. Muhammad	10.10.1960	Mardan	10 th	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
61.	Mr. Muhammad Khalid	01.01.1970	Chitral	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
62.	Syed Inayat Ali Shah	10.01.1972	D.I.Khan	MA	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	
63.	Mr. Niaz Gul	07.03.1971	Abbottabad	B.Sc	24.01.2014	Notification No. S/418/14 dt: 24.01.2014	

ATTESTED
To Be True Copy

55

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
64.	Mr. Muhammad Ishtiaq	04.05.1973	Mansehra	B.Sc	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
65.	Mr. Zahid-ur-Rehman	25.03.1970	Haripur	M.Sc	08.04.2016	Notification No. 373/SE-I dt: 08.04.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
66.	Syed Mukhtiar Shah	18.10.1967	Haripur	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
67.	Muhamunad Tahir Shah	01.03.1972	Bannu	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
68.	Mr. Nisar Muhammad	20.01.1973	Lakki	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
69.	Mr. Noor Zamin Shah	30.01.1962	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
70.	Mr. Khan Khel	10.04.1969	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
71.	Muhammad Aleem Jan	11.04.1967	Peshawar	B.Sc	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
72.	Mr. Tajamul Khan	30.09.1965	Swabi	MA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
73.	Mr. Hameedullah	25.04.1974	Mardan	BA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
74.	Mr. Taj Malook	10.04.1961	Swabi	FA	24.01.2014	Notification No. S/418/14, dt: 24.01.2014	
75.	Muhammad Atiq Shah	01.09.1978	Charsadda	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014.	
76.	Mr. Zar Wali	20.01.1961	Peshawar	FA	06.02.2014	Notification No. S/677/14 dt: 06.02.2014.	
77.	Mr. Ijaz Ahmad	05.04.1963	Mansehra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
78.	Mr. Arshad Mehmood	15.08.1964	Mansehra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
79.	Mr. Shakeel Ahmad	14.04.1969	Charsadda	BSc	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
80.	Mr. Muhammad Saced	04.05.1969	Mardan	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
81.	Mr. Khabir Muhammad	01.01.1972	Abbottabad	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
82.	Ms. Nazia Naureen	01.12.1970	Abbottabad	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
83.	Mrs. Shahzadi Noshad	10.04.1972	Hangu	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
84.	Mr. Rahim Hussain	11.05.1970	Shangla	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
85.	Mr. Amjad Hussain	24.03.1971	Mansehra	FA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
86.	Mr. Rizwan Habib	19.04.1974	Mansehra	BA	12.09.2014	Notification No 1092/E-II dt 12.09.2014	
87.	Mr. Jehangir Khan	10.11.1965	Abbottabad	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
88.	Mr. Rahmat Ullah	05.03.1971	Nowshera	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
89.	Mr. Rashid Iqbal	15.01.1974	Mardan	MSc	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
90.	Mr. Alamzeb	12.02.1980	Mardan	F.Sc	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
91.	Mr. Zahir Shah	01.04.1962	Buner	FA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
92.	Mr. Zafar Khan	10.01.1963	Buner	10 th	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
93.	Mr. Asad Mehmood	08.03.1968	Swabi	BA	24.10.2014	Notification No S/3528/14 dt:24.10.2014	
94.	Mr. Muzakir Shah	01.06.1961	Dir Lower	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
95.	Mr. Muhammad Aslam	08.04.1962	Karak	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
96.	Mr. Safdar Khan	30.04.1971	Kohat	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
97.	Mr. Murad Ali	09.01.1973	Bannu	F.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
98.	Mr. Mujeeb Ur Rehman	02.04.1969	Bannu	BA/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
99.	Ms. Aneefa Naz	09.10.1971	Peshawar	M.A	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
100.	Ms. Asmat Ara	15.04.1977	Swabi	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
101.	Mrs. Sneezie Shahid	30.04.1975	Charsadda	MA/LLB	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
102.	Mrs. Rozia Akraf	30.07.1969	Peshawar	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
103.	Ms. Hamida Bano	04.12.1970	Peshawar	BA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
104.	Mr. Mustafa Kamal Pasha	01.09.1969	Bannu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	

ATTESTED

To Be True Cop.

(Signature)

(Signature)

MA

SEI

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
105.	Mr. Azmat Ali Khan	06.01.1970	Barnu	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
106.	Mr. Waqar Ahmad	12.04.1974	Charsadda	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
107.	Mr. Sajjad Hussain	23.03.1976	Nowshera	B.Sc	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
108.	Mr. Yasir Aman	11.08.1970	Peshawar	D.Com	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
109.	Mr. Muhammad Maroof	05.10.1974	Abbottabad	B.Sc	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
110.	Mr. Usman Ghani	09.07.1960	Peshawar	10 th	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
111.	Mr. Ali Gohar	23.03.1968	K. Agency	MA	02.04.2015	Notification No. 2573/SE-I dt: 02.04.2015	
112.	Muhammad Ilyas	25.12.1973	Mardan	B.A	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
113.	Mr. Rokhan Zeb	07.04.1965	Swabi	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
114.	Mr. Fazal Dad	16.03.1966	Charsadda	M.A/LLB	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	Revised seniority was granted vide Notification No. 911/E-11 dated 12.12.2018
115.	Mr. Janzada	01.04.1963	Charsadda	M.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
116.	Mr. Naseer Ali	03.10.1975	Charsadda	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
117.	Mr. Muhammad Rauf	04.04.1963	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
118.	Mr. Hidayat Ullah shah	20.04.1965	Swabi	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
119.	Mr. Muhammad Ismail	12.06.1966	Lakki	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
120.	Mr. Shakeel Ahmed	12.01.1974	Peshawar	FA	30.12.2019	Notification No.1723/SE-I dt: 30.12.2019	Revised seniority was granted in compliance with the judgment of Honorable Khyber Pakhtunkhwa Service Tribunal in Service Appeal No.626/2018, vide order dated 13.02.2019 and Execution Petition No.157/2019, dated 10.05.2019 and DSC minutes held on 01.07.2019
121.	Mr. Shabir Hussain Shah	15.06.1972	Lakki	MA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
122.	Mr. Aqib Hussain	01.04.1965	Kohat	BA/LLB	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
123.	Mr. Falak Nawaz	03.02.1969	Kohat	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
124.	Mr. Shoukat Ali Shah	09.10.1960	Kohat	10th	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
125.	Mr. Afsar Khan	30.01.1961	Karak	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Assigned revised seniority vide Notification No.261/SE-I dated 07.03.2018
126.	Mr. Khalid Usman	06.01.1967	Karak	FA	18.08.2015	Notification No. 3806/SE-I dt: 18.08.2015	
127.	Mr. Gharib Nawaz	06.09.1961	Karak	F.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
128.	Mr. Muhammad Satta Khan	04.04.1964	Central	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
129.	Mr. Muhammad Zaman	01.01.1965	Buner	B.A	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	
130.	Mr. Hayat Ullah	04.08.1965	Mardan	10th	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	

ATTESTED
To Be True Copy

M. S. Khan

(Signature)

*MA
SE-1*

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
131.	Mr. Muhammad Fayaz	07.03.1974	Mardan	FA	25.03.2016	Notification No. 312/SE-I dt: 25.03.2016	Re-instated in Service with all back benefits. Order No. S/5323/19 dated 28.06.2019
132.	Mr. Amir Hussain	25.05.1965	Swabi	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
133.	Mr. Gran Ullah	15.06.1963	Charsadda	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
134.	Mr. Fazal Wahid	12.01.1971	Malakand	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
135.	Mr. Gohar Ali	15.11.1974	Peshawar	BSc	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
136.	Mr. Riaz Khan	03.02.1975	Peshawar	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
137.	Mr. Izhar Shah	06.03.1966	Mardan	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
138.	Mr. Habib Ur Rehman	04.03.1966	Mansehra	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
139.	Mr. Aurang Zeb	05.01.1970	Mansehra	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
140.	Mr. Shah Nawaz	08.08.1965	Mansehra	10th	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
141.	Mr. Muhammad Altaf	12.03.1969	Haripur	FA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
142.	Mr. Amjid Ali	24.04.1969	Swabi	BA	30.09.2016	Notification No. 1033/SE-I dt: 30.09.2016	
143.	Mr. Sher Rehman	05.04.1964	Mardan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
144.	Mr. Khalid Mehmood	21.05.1961	Abbottabad	B.A	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
145.	Mr. Riaz Muhammad	10.12.1962	Swabi	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
146.	Mr. Iftikhar Ali Shah	11.05.1976	Bannu	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
147.	Mr. Murad Ali	13.04.1965	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
148.	Mr. Ziarat Gul	05.10.1960	Charsadda	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
149.	Mr. Naseer Khan	01.04.1962	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
150.	Mr. Arab Nawaz	11.02.1969	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
151.	Mr. Inayatullah	11.04.1962	Peshawar	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
152.	Mr. Muhammad Yaseen	30.03.1975	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
153.	Mr. Zahoor-Ud- Din Khan	05.05.1963	D.I.Khan	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
154.	Mr. Sawab Gul	12.04.1961	Mardan	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
155.	Mr. Muhammad Ijaz Khan	01.09.1977	Charsadda	BA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
156.	Mr. Shaheen Shah Gohar	03.03.1971	Charsadda	BA	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
157.	Mr. Sajjad Haider	20.04.1970	Abbottabad	10th	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
158.	Mr. Ibrar Khan	20.05.1970	Abbottabad	FA	15.11.2016	Notification No. 1198/SE-I dt: 15.11.2016	
159.	Mr. Arshad Khan	30.05.1974	Peshawar	F.Sc	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
160.	Mr. Muhammad Khrushid	12.01.1963	Mansehra	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
161.	Mr. Muhammad Yaseen	28.12.1973	Haripur	BA	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
162.	Mr. Iftikhar Ahmad	10.05.1968	Mansehra	BA	14.03.2017	Notification No. 231/SE-I dt: 14.03.2017	
163.	Mr. Zakir Hussain	09.03.1966	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
164.	Mrs. Samina Zafar	25.12.1975	Haripur	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
165.	Mr. Bashir Ahmad	11.05.1962	Haripur	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	Revised seniority was granted vide Notification No. 20/SE-I dated 03.01.2019
166.	Mr. Mehboob	16.12.1962	Abbottabad	10th	07.03.2017	Notification No. 202/SE-I dt: 07.03.2017	
167.	Mr. Habib Ur Rehman	16.04.1974	Abbottabad	BA	12.03.2018	Notification No. 274/SE-I dt: 12.03.2018	
168.	Mr. Shahid Aman	27.03.1973	D.I.Khan	MA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
169.	Mr. Matloob Shah	07.01.1968	Mansehra	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	

ATTESTEN
To Do
M. Akbar

(Signature)

(Signature)

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
170.	Mr. Muhammad Hamayun	01.04.1963	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
171.	Mr. Ashiq Hussain	06.12.1960	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
172.	Mr. Mukhtar Ahmad	06.04.1962	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
173.	Mr. Adalat Khan	04.08.1960	Abbottabad	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
174.	Mr. Ghulam Muhammad	01.11.1963	Mansehra	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
175.	Mr. Muhammad Nabi	09.10.1966	Charsadda	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
176.	Mr. Ayaz Mehmood	20.02.1971	Mardan	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
177.	Mr. Shah Mumtaz	20.02.1965	Dir Lower	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
178.	Mr. Zafar Ahmad	10.01.1979	Chitral	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
179.	Mr. Farmanullah	27.10.1978	Dir Lower	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
180.	Mr. Muslim Khan	16.02.1970	Mardan	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
181.	Mr. Said Rahim	08.02.1962	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
182.	Mr. Hukam Khan	14.03.1969	Charsadda	MA.LI.B	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
183.	Mr. Wilayat Khan	20.12.1960	Peshawar	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
184.	Mr. Mehar Ali	01.01.1969	Nowshera	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
185.	Mr. Yar Nawab	05.11.1963	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
186.	Mr. Iftikhar Ali	10.02.1968	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
187.	Mr. Nasir Khan	22.11.1968	Charsadda	MA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
188.	Mr. Noor Zaman	21.08.1961	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
189.	Mr. Hazrat Ullah	05.01.1964	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
190.	Mr. Liaqat Ali	08.04.1964	Charsadda	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
191.	Mr. Mehmood Nawaz	07.03.1974	Lakki	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
192.	Mr. Muhammad Yousaf	10.02.1961	DI Khan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
193.	Mr. Umar Daraz Khan	11.08.1961	D.I.Khan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
194.	Mr. Bashir Dad	14.04.1972	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
195.	Mr. Roshan Zeb	16.02.1964	Mardan	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
196.	Mr. Gul Sheed	01.06.1980	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
197.	Mr. Taj Malook	10.02.1961	Charsadda	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
198.	Mr. Muhammad Saddique	16.11.1968	Abbottabad	BA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
199.	Mr. Abdur Rehman	17.11.1960	Peshawar	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
200.	Mr. Samin Jan	06.03.1961	Peshawar	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
201.	Mr. Tayyab Jan	01.05.1970	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
202.	Mr. Fazal Subhan	02.05.1968	Nowshera	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
203.	Mr. Alam Zeb	10.11.1963	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
204.	Mr. Saqad Khan	15.04.1964	Peshawar	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
205.	Mr. Noor Ullah	10.05.1964	Peshawar	D.Com	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
206.	Mr. Muhammad Ishaq	21.12.1968	Nowshera	F.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	Retised seniority was granted vide Notification No. 632/SE-I dated 30.05.2019
207.	Mr. Pasham Gul	29.04.1963	Mardan	10th	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
208.	Mr. Mukhtiar Dad	03.12.1964	Charsadda	FA	30.01.2018	Notification No. 115/SE-I dt: 30.01.2018	
209.	Mr. Zahir ur Rehman	10.01.1962	Charsadda	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
210.	Mr. Sher Afzal	09.02.1962	Charsadda	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
211.	Mr. Asad Zubair	15.01.1980	Kohat	F.Sc	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
212.	Mr. Muhammad Saleem	01.03.1969	DIKhan	FA	29.11.2018	Notification No 1078/SE-I dt: 29.11.2018	

ATTESTED
To Be True Copy

M. S. I.

(S)

M. S. I.

S.No.	Name of Officers	Date of Birth	Domicile	Quf	D.O Promotion as DSP	Promotion of Notification	Remarks
	Tariq						
213.	Mr. Fazal Wahid	01.12.1968	Mardan	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
214.	Mr. Amir Nawaz	20.03.1970	Charsadda	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
215.	Mr. Liaqat Khan	10.06.1962	Peshawar	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
216.	Mr. Muhamamad Shoaib	29.03.1962	Mardan	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
217.	Mr. Afsar Zaman	01.09.1969	Mardan	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
218.	Mr. Abdur Rashid	03.05.1968	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
219.	Mr. Khalid Khan	02.01.1969	Nowshera	MA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
220.	Mr. Niaz Muhammad	14.09.1973	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
221.	Mr. Allama Iqbal	05.03.1979	Charsadda	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
222.	Mr. Tauheed Ullah	08.04.1982	Charsadda	MA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
223.	Mr. Faqir Hussain	02.02.1967	Peshawar	10th	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
224.	Mr. Zahid Khan	08.04.1967	Mkd. Agency	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
225.	Mr. Badshah Hazrat	15.02.1969	Dir Lower	BA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
226.	Mr. Naveed Iqbal	13.03.1981	Swat	FA	29.11.2018	Notification No.1078/SE-I dt: 29.11.2018	
227.	Mr. Ajmal Khan	15.05.1982	Mkd: Agency	F.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
228.	Mr.Ghulam Sadiq	01.02.1968	Mkd: Agency	B.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
229.	Mr. Muhammad Irfan	01.08.1970	Karak	B.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
230.	Mr. Saifullah Khan	08.08.1959	Kohat	M.Sc/ LLB	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
231.	Mr. Hussain Ghulam	10.03.1970	Hangu	F.A	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
232.	Mr. Muhammad Iqbal	11.02.1963	Manshra	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
233.	Mr. Farhad Ali	16.11.1962	Mardan	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
234.	Mr. Azam Ali Shah	01.01.1963	Abbottabad	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	
235.	Mr. Arshad Hussain	15.05.1967	Shangla	10th	16.05.2019	Notification No.558/SE-I dt: 16.05.2019	

ATTES
To Be True Copy

Endst: No. & date even.

Copy to all concerned

(SALMAN CHOUDHRY) PSP
Deputy Inspector General of Police, HQrs,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Act - XI

SR-A

From: The Superintendent of Police,
Special Branch, South Regions.

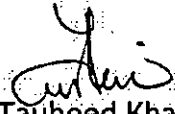
To: The Deputy Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa Peshawar.

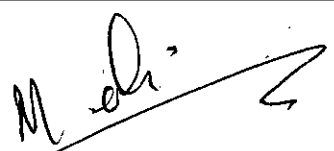
No. 76 /SB dated Bannu, the 16 /05/2020

Subject: REPRESENTATION AGAINST PROVISIONAL SENIORITY LIST OF DSsP AS IT
STOOD ON 30.04.2020 ISSUED VIDE ORDER NO.840/ES-1 NOTIFIED BY PPO
PESHAWAR

Memo:

A self-explanatory note of undersigned regarding subject matter is submitted for kind perusal and onward submission to the worthy Inspector General of Police Khyber Pakhtunkhwa Peshawar for further necessary action, please.


Tauheed Khan
SP/Special Branch
South Regions.


ATTESTED
To Be True Copy

To: The Provincial Police Officer/IGP
Khyber Pakhtunkhwa,
Peshawar.

Through: Proper Channel

Subject: **REPRESENTATION**
Sir,

Reference Order/ Notification No.840/SE-1, Dated 30-04- 2020
Issued By CPO Peshawar.

Tauheed Khan DSP (BPS-17) Serial No.21

Against:

Bakht Zada DSP (BPS-17) Serial No.01

Amjad Ali DSP (BPS-17) Serial No.02

Janas Khan DSP (BPS-17) Serial No.07

Asif Gohar DSP (BPS-17) Serial No.10

Sana Ullah DSP (BPS-17) Serial No.13

Nasir Khan DSP (BPS-17) Serial No.16

Respondents

I approach your good self with the following request;

1. I have joined the department as Assistant Sub Inspector on 01-02-1995 after qualifying the Public Service Commission examination and subsequently confirmed from the date of joining as ASI after successfully completion of probationer period.
2. My name was brought on list "E" on dated 25.04.1998 vide DIG/DIK Endst: 623-28/ES dated 25.04.1998.
3. I have qualified upper class course vide term ending March 1998 from Sihala College.
4. I was promoted as officiating Sub: Inspector w.e.f 23.11.2001 vide DIG/DIK No.2354-55/ES dated 23.11.2001 and after successfully completion of SHO Period according to Police Rule 13.10 (2). I was confirmed in the Rank of SI w.e.f 07.04.2003 vide DIG/DIK Endst: No.385-86/ES dated 23.07.2003.
5. Promoted officiating Inspector w.e.f 20.12.2005 vide Addl: IG/HQrs letter No.24571-640/E-II dated 29.12.2005 and my name was also brought on list "F" w.e.f 20.12.2005 vide notification No.110-13/ES dated 28.01.2006.
6. Then confirmed as Inspector vide Addl:IG/HQrs Notification No.26242-5/E-II dated 27.10.2009.
7. Lastly I got promoted to the Rank of DSP w.e.f 19.03.2012 vide Notification No.7156-7213/E-I dated 13.04.2012.
8. I have qualified Junior Command Course 3rd from 31 July to 28 October 2017 successfully.

ATTESTED
To Be True Copy

- 9. Remained posted as acting SP since 2016.
- 10. Presently I am serving as acting SP/Special Branch South Regions till date.
- 11. At the very outset I quote the golden principle of seniority i.e. ***“Seniority is reckoned from the date of confirmation in the substantive rank”***.
- 12. The journey from date of appointment to the date of confirmation encompasses years & years. The qualification in the proposed courses (regular & refresher), training in various fields and discipline to improve cognitive skills, test posting in various branches & overall performance, evaluation records are mandatory for confirmation under the Police Rules unlike of other Provincial departments of Civil administration where mainly the length of service matters.
- 13. Police being the law enforcing agency cannot afford the vacuum and the officiating promotions are offered to fulfill the gap in case of retirement, gallantry, shahadat, promotion etc. The substantive posts are lesser than the actual occupants hence; an officiating officer cannot supersede the confirmed officer, may be the earlier is senior in his batch or otherwise.
- 14. Needless to point out that under the Police Rules, promotion lists are separately maintained from the seniority lists such as A, A1, B1, C, D, E and F. ***The confirmed officers from the seniority list are picked up for the promotion at district, divisional and provincial level to the next higher rank making a pyramid to filter good and bad. The leftover is constrained to improve their performance and compete for promotion to achieve the goal of “seniority cum fitness “another golden principle for promotion as envisaged in Police Rules 13.1.***
- 15. It will not be out of mention to refer Rule 17 of the N.W.F.P Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 wherein it has been expressly stated that “if a junior person is promoted to the higher post by superseding the senior person and subsequently that senior person is also promoted, the person already promoted shall stand senior to him provided that junior person shall not be deemed to have superseded a senior person if the case of senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit.”
- 16. Finding a chance, I sum up my courage to point out that while making promotions at *divisional levels, the requirements of Police Rules for qualifying promotions to the rank of Sub Inspector are ignored and at times time-barred retrospective seniorities are granted carelessly without knowing the fact whether the person had observed all the qualification criterion and pre-requisite for the said promotion, causing disturbance in the seniority list.*
- 17. At the very outset I quote the golden principle of seniority i.e. ***“Seniority is reckoned from the date of confirmation in the substantive rank”***. But the column showing date of confirmation after the date of appointment/entry into service has been deleted from the impugned seniority list, which is against the law, rules, policy and the canon of justice.
- 18. It is worth mentioning here that since independence of Pakistan (since 1934) recruitments/promotions are being made as per Police Rules 1934. Furthermore, Police Rules 1934 has been protected under Article 141 of


ATTESTED
 To Be True Copy

The Khyber Pakhtunkhwa Police Act, 2017 and Article 185 of Police Order 2002 provides that "the Police rules made under the Police Act 1861 (V of 1861) shall continue to remain in force until altered, repealed or amended by the appropriate authority" become fresh no rules have been framed for Police department even in all other Provinces including the Province of Punjab, Police Rules 1934 is still in practice for the reason that no Province has yet framed fresh Police Rules under Police Order 2002.

19. Reference to the subject order number, the officers, Mr. Bakht Zada S.No-1, Mr. Amjad Ali S.No-2, Janas Khan DSP (BPS-17) Serial No.07, Asif Gohar DSP (BPS-17) Serial No.10, Mr. Sanaullah S.No-13 and Mr. Nasir Khan S.No-16, have been placed senior to me which is against the constitution, police rule, police Act, and direction of worthy supreme court of Pakistan.

SENIORITY POSITION IS TABULATED BELOW

S.No	Name	Rank	Original Position	New Position	Remarks
1.	Mr. Bakht Zada	DSP	30	1	<p>a) Mr. Bakht Zada was appointed as TASI (Temporary) while I am appointed as PASI through Public Service Commission</p> <p>b) As he was appointed on temporary basis therefore he was truly not confirmed from the dated of appointment</p> <p>c) He was on the strength of Malakand Region and in that time there was no available vacancy while the applicant was on the strength of DIK Region as probationer and against the available confirmed vacancy.</p> <p>d) He was abroad many times on leave due to which he could not complete the mandatory pre requisite for confirmation as ASI and SI while the applicant fulfilled all the requirements in-time.</p>
2.	Mr. Amjad Ali	DSP	62	2	<p>a) He has completed his upper school course in September 2005 which is Mandatory for confirmation as SI while the applicant Passed upper school course in 1999.</p> <p>b) He was promoting as officiating SI regularly on 16-05-2000 while the applicant is promoted on 23.11.2001 and there was no confirm vacancy available for SI at that time in Malakand Region.</p>
3.	Mr. Janas Khan	DSP	7	7	<p>a) He was promoted out of turn as per Standing Order No. 11/1987, Letter No. 20710-60/1995, Standing Order No. 07/2003, Standing order No. 17/2014, Standing Order No.05/2016.</p> <p>b) Therefore in compliance the judgment of Supreme Court of Pakistan dated 13.05.2018, and recommendation of the committee constituted for the purpose, the following Standing Order/ Instruction which extend the incentives for the promotion and confirmation to the Cadet Law Instructors and Drill serve in the Police Training College Hangu and order Training Institutions amount to out of turn promotion are hereby withdrawn vide CPO letter No.1001-1100/GB dated 10.01.2019 (Copy is attached)</p> <p>c)</p>
4.	Mr. Asif Gohar	DSP	10	10	-do (As above)-

ATTESTED
To Be True Copy

5.	Mr. Sanaullah	DSP	28	13	a) Mr. Sana Ullah was placed junior than me in the seniority list issued since 2005 of Inspectors and DSsP but he was assigned revised seniority by CPO Peshawar vide Notification No. CPO/E-II/ revised seniority /33 dated 27.01.2020
6.	Mr. Nasir Khan	DSP	136	16	Mr. Nasir Khan remained Junior ever since the recruitment of the applicant as ASI through Public Service Commission against the vacant seat of ASI on 01.02.1995. The Name of DSP Nasir Khan is brought on list "E" in (FRP) 20.02.2002 while the applicant name has been brought on list "E" w.e.f 25.04.1998.

Detailed service record of Nasir Khan DSP is shown in below comparative table which shows him clearly junior on each and every step of promotions/service record.

DSP Nasir Khan	Date	Applicant
Dated of enrolment as FC	02.05.1991	Applicant got enrolled as ASI through Public Service commission on 01.02.1995.
Lower School Course	20.10.1997	Applicant did lower & Intermediate School Courses as probationer ASI in 1995.
Name brought on List "C" as HC	18.04.1998	Applicant recruited as ASI
Intermediate School Course	10.10.1998	Applicant got confirmed as ASI from the date of enlistment (01.02.1995) after completion of probationer period brought on list "E" w.e.f 25.04.1998 vide DIG/DIK Endst: No.623-28/ES dated 25.04.1998.
Name brought on List "D"	25.05.1999	Qualified Upper Class Course vide term ending March 1999
Selection Grade Officiating ASI (BS.11)	17.02.2000	Applicant already senior
Name brought on List "E" in (FRP)	20.02.2002	Applicant already senior
Transferred to Peshawar from FRP	17.05.2002	Not Concerned
Lien Transferred to Peshawar on (allotted No.167/P)	08.10.2002	Not Concerned
CCPO Peshawar approached Commandant FRP to Seek Guidance/regularization of officer on 26.11.2002 Commandant FRP Issued Revised order and showed his name on list "D" at S.No.4 and list "E" S.No.3	05.11.2002	Not Concerned
DPC placed his name in list "D" of Officiating ASI in merit of year 1998 in which he had passed the Intermediate School Course with his Colleagues.	08.09.2003	Applicant qualified intermediate in 1995.

M. Ali
ATTESTED
To Be True Copy

20. Police Rules 12.2(3) provides that all appointments of the enrolled Police Officers are on the probation according to the rules in chapter 12 applicable to each rank. Seniority in the case of upper subordinates, will be reckoned in the first instance from the date of first appointment, officers promoted from the lower rank will be considered senior to the persons appointed direct on the same date, and the seniority of the officers appointed direct on the same date will be reckoned according to the age. Seniority shall, however be finally settled by the dates of confirmation. The seniority inter-se of several officers confirmed on the same date being that allotted to them on first appointment. Provided that any officers whose promotion or confirmation is delayed being reasons to his being on deputation outside his range or district shall, on being promoted or confirmed, regular the seniority which he originally held vis-à-vis any officers promoted or confirmed before him during his deputation.
21. Police Rule 13.18 regulate probationary period of promotion which provides that all Police officers promoted in rank shall be on probation for two years, and on conclusion of the probationary period a report shall be rendered to the authority empowered to confirm the promotion who shall either confirm the officer or revert him. In no case shall the period of probation be extended beyond two years and the confirming authority must arrive at a definite decision within that period whether the officer should be confirmed or reverted.
22. From the rules quoted above, it is very much clear that seniority lists and promotion lists are two separate things which cannot be amalgamated with each as is presently done in the CPO because at present promotion list "F" is considered as a seniority list which is wrong and against the rules. The Supreme Court has also held so in its various Judgments like Azmat Ghafoor, case.
23. For all directly appointed officer three years probationary period(except temporary) is provided (Police Rule 12.8) while for all other officers promoted from one rank to another, two years' probation period is provided in Rule 13.18. After completion of probation period the officers have to be confirmed, which means that confirmation for officer promotion has to be made in each rank and confirmation dates of the officer shall vary from rank to rank. As envisage in Rule 12.2(3) that seniority in case of upper subordinate will be reckoned in the first instance from the date of first appointment, officer promoted from lower rank will be considered senior to the persons appointed directly on the same date, while seniority shall finally be settled by dates of confirmation.
24. There is no ambiguity in the rules. Under the rules discussed above, seniority of the officer shall be finally settled by dates of confirmation in each rank and to assign seniority in the rank of DSP from the date of first appointment as ASI is totally against the rules as applied in case of DSP Bakhtzada and DSP Amjad Khan. In each rank date of promotion and confirmation shall be considered for assigning seniority to them. By giving seniority to a DSP from the date of appointment as ASI would amount to

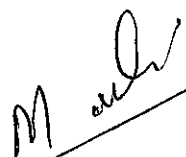
M. Khan
ATTESTED
To Be True Copy

bypass all the above mentioned rules which regulate promotion/appointment. Police Officer cannot be treated as civil servant, as Special Rules other than General Service Rules applicable to the Civil Servants has been framed, under which Police Officers cannot be treated at par with the Civil Servant. General Rules of Civil servant can only be applied on Police Officer when there is no such provision in Police Rules in respect of any issue/point. The Supreme Court of Pakistan in its Judgment reported in PLD 1985-Supreme Court Page 159, has elaborated in detail this aspect of Police as well as Civil Servant.

25. Under rule 12.2 (3) the prescribed criteria mention for the confirmation in upper grade; *"who had a good record of service, well qualified had earned commendation certificate and cash awards and never earned any adverse report in his/her carrier and also had qualified requisite condition of passing prescribed training course which was prerequisite for confirmation as sub inspector of police was entitled to be confirmed"*
26. In the light of rules and principles laid down by the Supreme Court of Pakistan in its judgement (2018 SCMR 1218), the out of turn promotion is declared as unconstitutional and cannot be extended to apply to retrospectively on the cases and also the supreme court has sort the complete report from the police of all provinces and further directed that those officers who got out of turn promotion, shall be revert to their previous position. Moreover, the honorable supreme court has directed to the DPC/board as the case may be, shall be immediately held in compliance report be submitted to the registrar of this court for our perusal and chamber within a period of one month and in case of non-compliance of the august supreme court is amount to contempt of court.
27. It is paramount in the interests of justice, that the legal rights and privileges of the Applicants are protected by granting them a full and fair opportunity to present their cases in order to allow to establish a flawless opinion and reach a consummate decision based on germane facts and law.
28. The applicant is also requesting for personal hearing to the worthy IGP as per rules.

Prayer, in view of above paras and grounds it is submitted that the impugned seniority list of DSP BS-17 of Khyber Pakhtunkhwa Police Notification vide No. 840/SE-I, Dated: 30-04-2020, may kindly be set aside and revised to the previous Seniority List of DSsP BS-17 issued vide notification No. 347/SE-1, dated 19.03.2019, keeping in view, the seniority in confirmation as Assistant Sub Inspector, Sub Inspector, Inspector and entry to the promotion lists D, E & F as provided and maintained in the law, rules and norms of justice.


(TAUHEED KHAN)
Acting SP/Special Branch
South Regions


ATTESTED
To Be True Copy

Power of Attorney
BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

(59)

In Re: Service Appeal No. 12081 /2020

Tauheed Khan s/o Abdul Hameed Khan

.....Appellant

Versus

Government of Khyber Pakhtunkhwa & Others

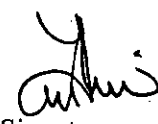
.....Respondents

By this, power-of-attorney I/we, the said **Tauheed Khan s/o Abdul Hameed Khan, Appellant**, undersigned, do hereby nominate and appoint **Mr. Isaac Ali Qazi, ASC, Mr. Maqsood Ali, AHC, Mr. Ishaq Ateeq, Advocate and Mr. Saad Ali Qazi, Advocate** to be counsel/s in the above matter for me/us and on my/our behalf as agree to appear plead act and answer in the above Court/Authority/Tribunal or any appellate court or any other court to which the business in transferred in the above matter as and is agreed to sign the file Petitions, Appeals, Statement, Accounts, Exhibits, Compromises or other documents whatsoever, in connection with the said matter or any matter arising therefore and also to apply for receive all documents or copies of documents, depositions etc. and to apply for and issue summons and other writs or sub poena and to apply for and get issued any arrest attachments or other execution, warrants or order and to conduct any proceedings that may arise there out; and reply for and receive payment of any or all sums or submit for the above matter arbitration, and to employ and other legal practitioner, authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so, any other lawyer may be appointed by may said counsel to conduct the case who shall have the same persons.

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

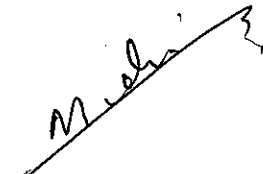
And I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of these powers or as is the usual practice in such matters.

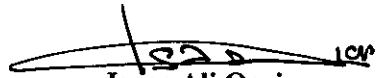
Provide always, that I/we under that at the time of calling case by the court if the case may be dismissed in default, if it be proceeded *ex-parte* the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right IN WITNESS WHEREOF I/WE has hereto signed at Peshawar ___ day of May in the year 2020.



Signature
(Executant / Executants)

Accepted subject to the terms regarding fee.


Maqsood Ali
Advocate High Court


Isaac Ali Qazi
Advocate Supreme Court


Ishaq Ateeq
Advocate

Saad Ali Qazi
Advocate

Isaac Law Associates
Advocates & Consultants
12, K-3, Phase-III, Hayatabad, Peshawar
Phone 5817132, 5818446, Mobile: 0300 8594555
Email: isaac.ali.qazi@gmail.com
www.isaaclaw.org

Talia Tariq
Talia

ATTES
To Be True Cop

VAKALAT NAMA

NO. 12081 /20

IN THE COURT OF KP SERVICE TRIBUNAL, PESHAWAR.

Tauheed Khan

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Deptt. & others.

(Respondent)
(Defendant)

I/We, Respondents No. 4, 5 & 6.

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

A. J. Ali
Amjad Ali
SP.

Bakht Zada
SP
(CLIENT)

Riaz Ahmed
Riaz DSP

ACCEPTED

M. Asif

M. ASIF YOUSAFZAI

Advocate Supreme Court Peshawar.

&

TAIMUR ALI KHAN

Advocate High Court, Peshawar

&

SYED NOMAN ALI BUKHARI

Advocate High Court

& S. Khan

SHAHKAR KHAN YOUSAFZAI

Advocate.

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar