

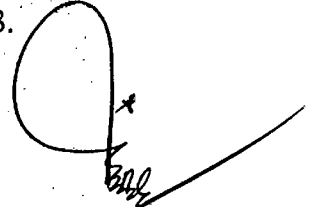
23.11.2022 Due to rush of work. This case has been  
deleted. To come up for the same as before on  
23.01.2023.

Cyrl.  
Reader.

29.03.2022

None for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Asad Ullah Khan, SO (Litigation) for respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of the respondents seeks time to submit the same on the next date. Adjourned. To come up for written reply/comments on 10.06.2022 before S.B.



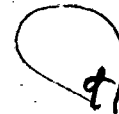
(MIAN MUHAMMAD)  
MEMBER(E)

10.06.2022

Junior to counsel for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Ihtesham JC for respondents present.

Representative of respondents submitted reply/comments. To come up for rejoinder, if any, and arguments on 30.08.2022 before D.B.



(Rozina Rehman)  
Member (J)

30.08.2022

Appellant in person present. Mr. Naseer Ud Din Shah, Assistant Advocate General for the respondents present.

Learned Member (Judicial) Mrs. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 23.11.2022 before the D.B.



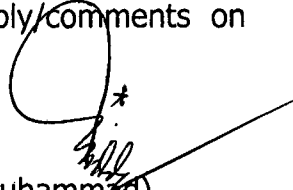
(Salah-Ud-Din)  
Member(J)

25.11.2021

Counsel for the appellant present. Preliminary arguments have been heard.

Learned counsel for the appellant at the outset of argument contended that the appellant is aggrieved by Notification of the Provincial government dated 09.01.2020 whereby all planning oriented posted in BS-17 and above of newly regularized components/units of P&D Department and planning cells in Administrative departments alongwith incumbents as well as leftover posts, were included in appendix to schedule-I of Khyber Pakhtunkhwa Provincial Planning Service Rules, 2018. Consequent upon the said Notification, tentative seniority list of PPS BS-17 officers was circulated on 23.10.2020 seeking to identify error/omission if any, within 30 days. Name of the appellant appeared at serial No. 105 of the said tentative seniority list. The appellant submitted departmental appeal against the tentative seniority list, on 29.10.2020 which was not responded within the statutory period hence, the instant service appeal was filed on 18.03.2021. It was further argued that the appellant had joined the planning service through Khyber Pakhtunkhwa Public Service Commission in 2018 earlier than the Khyber Pakhtunkhwa Employees (Regularization of Service) Act, 2018 and merger of employees of the erstwhile FATA Secretariat and as such, he should have been reflected senior on the tentative seniority list. His fundamental rights guaranteed under Article 4,27 and 38 of the Constitution have been violated by the respondents. As the instant service appeal has been filed late(for about one month) application for condonation of delay is also submitted and the plea taken for delay and to justify it on technical ground under Khyber Pakhtunkhwa Epidemic control and Emergency Relief Act, 2020.

The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 27.01.2022 before S.B.

  
(Mian Muhammad)  
Member(E)

27.01.2022

Nemo for the appellant.

Notice be issued to the appellant and his counsel for attendance before the S.B on 29.03.2022.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)

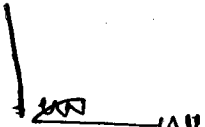


Appellant Deposited  
Security & Process Fee  


Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7270 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/08/2021	<p>The appeal of Mr. Furqan Shafi resubmitted today by Mr. Waqar Orakzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>01/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	01.10.2021	<p>Learned counsel for the appellant present.</p> <p>Learned counsel for the appellant requested for adjournment to further prepare the brief. Granted. To come up for preliminary hearing before the S.B on 24.11.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mr. Furqan Shafi son of Muhammad Shafi r/o House No. 11 Munner Road Peshawar received today i.e. on 18/03/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Appeal has not been flagged/marked annexures' marks.
- 5- Approved file cover is not used.
- 6- Copy of departmental appeal against the impugned order dated 09.01.2020 is not attached with the appeal which may be placed on it.
- 7- Annexure-E of the appeal is illegible and incomplete which may be completed and replaced by legible/better one.
- 8- Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 570 /S.T,

Dt. 18/03 /2021

  
REGISTRAR -  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Waqar Orakzai Adv. Pesh.

DEAR SIR L objection has Remove

File has been Re Submitted

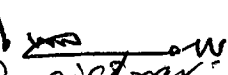
Waqar Orakzai

ADV Waqar Orakzai

20/4/2021


Objections no. 6 & 7 are still stand.  
Therefore, the same returned again to  
the counsel for the appellant for completion  
and resubmission within 15 days.

no. 842 /S.T  
dt. 25/05/2021

  
Registrar

جناب عالی!

ہمارے پاس بھی ارسال ہے اور شرحِ محنت کے دوران  
اگر اور کاغذات ہیں تو سس کر نیکی۔

  
11/8/2008

**BEFORE THE CHAIRMAN KHYBER PAKHTUNKHUWA  
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal. No 7270 A/2021

**Furqan Shafi**

...Appellant

Versus

**Government of Khyber Pakhtunkhuwa (KPK), etc**

...Respondents

**SERVICE APPEAL**

**Index**

S.no	Description	Page#	Annexure
1.	Service Appeal on behalf of Appellant along with Affidavit & Certificate	1-9	
2.	Copy of Advertised post, dated 29-12-2016. Attached as Annexure A.	10-18	A
3.	Copy of Interview Letter	19	B
4.	Copy Of Grievance Redressal Committee	20-21	C
5.	Copy Recommendations of Grievance Redressal Committee	22-23	D
6.	Copy of impugned notification Dated 09-01-2020	24	E
7.	Copy Of Seniority Lists	25-39	F1-F2
8.	Copy Of Departmental Representation	40-42	G
9.	Wakaltnama	43	

Appellant

Through



Dated: \_\_\_\_\_/2021

**Waqar Orakzai**  
Advocate High Court, Abbottabad

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Appeal No \_\_\_\_\_/2021

Furqan Shafi , so of Muhammad Shafi, resident of House No.11, Munner Road, Peshawar Cantt, Peshawar.

.....Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa (KPK), through Chief Secretary, Peshawar.
2. Finance Department, through Secretary Finance, KPK.
3. Planning and Development Department, through Additional Chief Secretary, KPK.
4. Law Department through Secretary Law KPK.
5. Establishment through Secretary Establishment KPK, Peshawar.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974**

Respectfully Sheweth,

**FACTS**

1. That the appellant is a civil servant, serving in the Planning Department of the Government of the Government of KPK in BPS-17, which is governed under the Provincial Planning Service (PPS) rules. The appellant was hired against the advertised post, dated 29-12-2016. (Attached as Annexure-A).
2. That the appellant was selected as the Planning Officer after applying for the said post advertised by the KPK Public Service Commission.



That, it is pertinent to mention here that the appellant was eligible according to the qualification criteria set forth by the KPK Public Service Commission in the said advertisement.

3. That the appellant was recommended by the KPK Public Service Commission after he passed the required competitive exam conducted by the competent authority. That only 2 posts were vacant *vide* the said advertisement.
4. That, pursuant to the said recommendation, the appellant was called in for an interview on 01-03-2018, and subsequently received his letter of appointment. That the Appellant remained pursuant to his recommendation throughout the recommendation process. Attached as **Annexure B**.
5. That the PPS is a newly established department and the appellant is amongst the first batch of initial appointees to the cadre who have joined through the Public Service Commission.
6. That the Government of KPK enacted the KPK Employees (Regularization of Services) Act, 2018, whereby, various employees working in different government projects were regularized, which gave rise to a lot of anomalies.
7. That the Respondent No. 1 regularized contract employees belonging to M & E, UPU, & CBP and the planning cells of various other departments in view of the KPK Employees (Regularization of Services) Act, 2018.

8. That the regularization of the abovementioned project employees gave rise to a lot of anomalies and in this regard the Government of KPK in its cabinet meeting dated 09-05-2019 formed a Grievances Redressal Committee for the settlement of glitches and inconsistencies that erupted in consequence of the regularization act. **Attached as Annexure C.**
9. That the Grievances Redressal Committee, in its recommendations, deliberated that all the positions created by the Finance Department for all the regularized projects under the KPK Regularization Act, 2018, shall be placed at the strength of attached formations of respective administrative departments, except the positions of Planning Cells, which falls under the Provincial Planning Service (PPS) and Engineering Wing of the Sports Department. **Attached as Annexure D.**
10. That the Respondent No. 1 *vide* notification dated 09.01.2020, bearing No. SO&P&D/0701-/19-39/2019, (hereinafter referred to as the 'Impugned Notification') included all planning oriented posts in BPS-17 and above, of newly regularized components units of Planning Department and Planning cells of Administrative departments., Civil Secretariat along with incumbents as well as left over posts as per the appendix in Schedule-1 of the KPK Provincial Planning Service Rules, 2018. **Attached as Annexure E.**
11. That in view of the Impugned Notification, the Respondent No. 1 merged the employees of the Fata Secretariat into PPS cadre after the amalgamation of erstwhile Fata in KPK. However, those employees were neither regularized in purview of KPK Employees

(Regularization of Services) Act, 2018, nor were they under the discussion of the Grievances Redressal Committee constituted by the Cabinet.

12. That subsequently, the Respondent No. 3 issued a tentative seniority list on 20.02.2020 of the Provincial Planning Service officers (PPS BS-17), which has affected the seniority of the appellant. That the appellant is placed at Serial No. 23 in the said list which is against the seniority rules and Section 6 of the KPK Employees (Regularization of Services) Act, 2018. That the respondents issued another seniority list in October 2020 which was not shared with the appellant in which he was placed at serial no 105. Attached as Annexure F1-F2.
13. That the appellant is aggrieved by the impugned actions of the respondent department and the adversaries caused to him.
14. That the appellant has filed a departmental appeal before the respondent No 4. Attached as Annexure G.

GROUND:

- 1) That the impugned actions of the respondents are unconstitutional, unlawful, violative of the rights of the appellant and against the principles of natural justice.
- 2) That the seniority list issued by respondent department has not met the requirement of law. That according to Section 6 of the KPK regularization act 2018 which is produced below :

Section 6: *Except the employees mentioned in the proviso to section 4 of this Act, whose services are to be regulated by their respective laws and rules, all other employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act, shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission or Departmental Selection Committee, as the case may be, made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.*

That the appellant was appointed in pursuance of his recommendation of the Commission and Departmental Selection Committee and therefore he was supposed to be senior to all those employees who were regularized in accordance to the *ibid* act.

- 3) That the KPK Employees (Regularization of Services) Act, 2018, could not be given retrospective effect so as to cause great detriment and prejudice to the appellant, who joined service as a regular employee prior to the passing of the said Act, and the regularization of the employees there under. On the subsequent regularization of the employees under the said Act, the seniority of the appellant cannot be affected, who, even otherwise, is to be ranked senior to the employees regularized under Section 6 of the Act *ibid*.

- 4) That the seniority list has been issued in sheer violation of all the recognized canons of law and propriety, and in this regard, the superior courts of law have held that, "*...it cannot be ignored that a repository of executive, judicial or quasi-judicial power is required to act in accordance with law. Any order, which has been passed in violation of law, cannot be protected simply because the repository of such power, has the power to pass such order.*" [PLD 2016 Balochistan 56 and 2015 SCMR 795].
- 5) That without prejudice to the foregoing, it is further submitted that, it is an established principle of the law that the services rendered by the employees on an ad hoc basis, prior to their regularization, cannot be counted for the purposes of their seniority. The seniority is to be counted from the date of their 'substantive' appointment [PLD 2016 Balochistan 56 and 2020 SCMR 1519]. It is clear from the facts of the case stated hereinabove that the appellant joined service as a regular employee, upon the recommendation of the Commission and the Departmental Selection Committee, prior to the passing of the KPK Employees (Regularization of Services) Act, 2018, therefore, the period of the ad hoc appointment of the employees subsequently regularized cannot be computed for the purposes of seniority, nor can their ad hoc services be regularized retrospectively.
- 6) That Establishment Department of the Government of KPK vide notification NO. SOR-VI/E & AD? 1-13/ 2009 Dated: 25<sup>th</sup> Feb, 2014 forwarded a copy of Government of Pakistan Cabinet Secretariat Establishment Division Office Memorandum NO. 1/59/2013-Lit-IV dated 31-01-2014. That the said memorandum contained the judgment of the Honourable Supreme Court which has laid down

the principles for recruitment as Public Servant and vice versa. That the impugned actions of the respondents are against the said notification and principles.

- 7) That the impugned actions of the respondents are an infringement of the fundamental rights of the appellant, as laid down under the Constitution of the Islamic Republic of Pakistan, 1973. In specific, the appellant's rights under Articles 4, 27, and 38 of the Constitution have been severely violated.
- 8) That it is further stated that the superior courts have consistently held that where the law requires a thing to be done in a certain manner, it shall be done in that manner only, as deviating from it undermines the entire process.
- 9) That the impugned actions of the respondents are *ex facie* discriminatory and are, therefore, void. They have caused prejudice to the rights of the appellant, and are in complete violation of the law.
- 10) That the appellant seeks permission to raise more grounds at the time of submissions at the bar.

### PRAYER

In view of the foregoing, it is most graciously submitted that

- i. The impugned notification NO. SO (E) P & D/071/19-39/2019 Dated 09-01-2020 be declared null and void , without lawful

authority and in negation to the law of the land in general and the Services Laws in Pakistan,

- ii. That the KPK Employees (Regularization of Services) Act, 2018, could not be given retrospective effect so as to cause great detriment and prejudice to the appellant, who joined service as a regular employee prior to the passing of the said Act, and the regularization of the employees thereunder. On the subsequent regularization of the employees under the said Act, the seniority of the appellant cannot be affected, who, even otherwise, is to be ranked senior to the employees regularized under Section 6 of the Act *ibid.*

*Any other relief which this Honourable Tribunal deem appropriate may also be given to the Appellant.*

Through

Appellant

*Waqar*

Waqar Orakzai

Advocate High Court

Abbottabad

&

Barrister Ummar Ziauddin

LLM Berkeley

Dated: \_\_\_\_\_/2021

**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE  
TRIBUNAL, PESHAWAR**

In re:

**Furqan Shafi**

*Versus*

**Government of Khyber Pakhtunkhuwa, through Chief Secretary, KPK**


**SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICE  
TRIBUNAL ACT, 1974**

**AFFIDAVIT**

I, **Furqan Shafi**, son of Muhammad Shafi, resident of Shiekh Otaar District Tank Presently residing at House No. 11, Munner Road, Peshawar Cantt, Peshawar, do hereby solemnly declare and affirm on oath that the contents of the accompanying appeal are true and correct to the best of my knowledge, information, and belief, and nothing therein, has been concealed from this learned Court.

  
DEPONENT

Verified at \_\_\_\_\_, on the \_\_\_\_ day of \_\_\_\_\_, that the contents of this affidavit are true and correct to the best of my knowledge, information, and belief, and nothing herein has been concealed from this learned Court.

  
DEPONENT



(19)

MUTED

"A"

**KHYBER PAKHTUNKHWA PUBLIC SERVICE  
COMMISSION**

**2- Fort Road Peshawar Cantt:**

**Website: [www.kppsc.gov.pk](http://www.kppsc.gov.pk)**

**Tele: Nos. 091-9214131, 9213563, 9213750, 9212897**

Dated: 29.12.2016

**ADVERTISEMENT No. 06 / 2016.**

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **27.01.2017**. Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

<b>AGRICULTURE, LIVESTOCK AND COOPERATIVE DEPTT:</b>	
<b>1.</b>	<p><b>NINETY FOUR (94) POSTS OF VETERINARY OFFICER (HEALTH) IN LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT (EXTENSION).</b></p> <p><b>QUALIFICATION:</b> Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized university and registered with Pakistan Veterinary Medical Council (PVMC).</p> <p><b>AGE LIMIT:</b> 22 to 35 years. <b>PAY SCALE:</b> BPS-17. <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> 24 to Merit, 16 each to Zone-1, 2, and 3 and 11 each to Zone-4 and 5.</p>
<b>2.</b>	<p><b>ELEVEN (11) POSTS OF VETERINARY OFFICER (HEALTH) (WOMEN QUOTA) IN LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT (EXTENSION).</b></p> <p><b>QUALIFICATION:</b> Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized university and registered with Pakistan Veterinary Medical Council (PVMC).</p> <p><b>AGE LIMIT:</b> 22 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Female.</p> <p><b>ALLOCATION:</b> Merit.</p>
<b>3.</b>	<p><b>TWO (02) POSTS OF VETERINARY OFFICER (HEALTH) (DISABLED QUOTA) IN LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT (EXTENSION).</b></p> <p><b>QUALIFICATION:</b> Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized university and registered with Pakistan Veterinary Medical Council (PVMC).</p> <p><b>AGE LIMIT:</b> 22 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> Merit.</p>
<b>4.</b>	<p><b>THREE (03) POSTS OF VETERINARY OFFICER (HEALTH) (MINORITY QUOTA) IN LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT (EXTENSION).</b></p> <p><b>QUALIFICATION:</b> Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized university and registered with Pakistan Veterinary Medical Council (PVMC).</p> <p><b>AGE LIMIT:</b> 22 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> Merit.</p>

<p>10.</p>	<p><b>FOUR (04) POSTS OF MALE COMMUNITY DEVELOPMENT OFFICER IN CDE AND GAD DIRECTORATE OF FOREST DEPARTMENT.</b></p> <p><b>QUALIFICATION:</b> At least 2<sup>nd</sup> class Master's Degree in Rural Development Sociology, Rural Sociology, Social Works, Anthropology, Agriculture Extension, Mass Communication or equivalent qualification from a recognized university.</p> <p><b>AGE LIMIT:</b> 22 to 30 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Male. <b>ALLOCATION:</b> One each to Merit, Zone-1, 4, and 5.</p>
<p>11.</p>	<p><b>TWO (02) POSTS OF COMPUTER OPERATOR (ONE EACH IN R AND D AND CDE AND GAD DIRECTORATES) FOREST DEPARTMENT.</b></p> <p><b>QUALIFICATION:</b> (i) At least 2<sup>nd</sup> Class Bachelor's Degree in Computer Science / Information Technology (BCS/BIT four years), from a recognized University; or (ii) At least 2<sup>nd</sup> Class Bachelor's Degree from a recognized university with one year Diploma in Information Technology from a recognized Board of Technical Education.</p> <p><b>AGE LIMIT:</b> 18 to 28 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Merit and Zone-1.</p>
<p>12.</p>	<p><b>THREE (03) POSTS OF RANGE OFFICER WILDLIFE IN THE OFFICE OF CHIEF CONSERVATOR OF WILDLIFE.</b></p> <p><b>QUALIFICATION:</b> (i) B.Sc in Wildlife Management / Wildlife Ecology / Wildlife Biology from a recognized university or institute with at least 2<sup>nd</sup> Division or (ii) B.Sc Forestry from Pakistan Forest Institute Peshawar in 2<sup>nd</sup> Division or (iii) B.Sc from a recognized university with Zoology / Botany as one of the subject in 2<sup>nd</sup> Division.</p> <p><b>Note:</b> - Qualification at S.No.(iii) will only be considered when no suitable candidate with qualification at S.No. (i) and (ii) is available.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Male. <b>ALLOCATION:</b> One each to Merit, Zone-2 and Zone-3.</p>
<p>13.</p>	<p><b>ONE (01) POST OF SENIOR SCALE STENOGRAPHER IN THE OFFICE OF CHIEF CONSERVATOR OF WILDLIFE.</b></p> <p><b>QUALIFICATION:</b> (i) Second Class Bachelor's Degree, from a recognized university; (ii) A speed of 70 words per minute in Shorthand in English and 45 words per minute in Typing; and (iii) Knowledge of Computer in using MS Word and MS Excel.</p> <p><b>AGE LIMIT:</b> 20 to 32 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> Merit.</p>
<p>14.</p>	<p><b>ONE (01) POST OF JUNIOR SCALE STENOGRAPHER IN THE OFFICE OF CHIEF CONSERVATOR OF WILDLIFE.</b></p> <p><b>QUALIFICATION:</b> (i) Intermediate or equivalent qualification from a recognized Board; (ii) A speed of 50 words per minute in Shorthand in English and 35 words per minute in Typing; and (iii) Knowledge of Computer in using MS Word and MS Excel.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> Zone-1.</p>

21.	<p><b>ONE (01) POST OF OFFICE ASSISTANT (WOMEN QUOTA)</b></p> <p><b>QUALIFICATION:</b> Bachelor's Degree from a recognized university with at least 2<sup>nd</sup> Division.</p> <p><b>AGE LIMIT:</b> 21 to 32 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Female.</p> <p><b>ALLOCATION:</b> Merit.</p>
22.	<p><b>ONE (01) POST OF OFFICE ASSISTANT (DISABLE QUOTA).</b></p> <p><b>QUALIFICATION:</b> Bachelor's Degree from a recognized university with at least 2<sup>nd</sup> Division.</p> <p><b>AGE LIMIT:</b> 21 to 32 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> Merit.</p>
<b>IRRIGATION DEPARTMENT</b>	
23.	<p><b>ONE (01) POST OF ZILLADAR (WOMEN QUOTA) IN IRRIGATION DEPARTMENT.</b></p> <p><b>QUALIFICATION:</b> Bachelor's Degree or equivalent qualification from recognized University.</p> <p><b>AGE LIMIT:</b> 21 to 30 years. <b>PAY SCALE:</b> BPS-15 <b>ELIGIBILITY:</b> Female.</p> <p><b>ALLOCATION:</b> Merit.</p>
24.	<p><b>ONE (01) POST OF ZILLADAR (DISABLED QUOTA) IN IRRIGATION DEPARTMENT.</b></p> <p><b>QUALIFICATION:</b> Bachelor's Degree or equivalent qualification from recognized University.</p> <p><b>AGE LIMIT:</b> 21 to 30 years. <b>PAY SCALE:</b> BPS-15 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> Merit.</p>
25.	<p><b>ONE (01) POST OF ZILLADAR (MINORITY QUOTA) IN IRRIGATION DEPARTMENT.</b></p> <p><b>QUALIFICATION:</b> Bachelor's Degree or equivalent qualification from recognized University.</p> <p><b>AGE LIMIT:</b> 21 to 30 years. <b>PAY SCALE:</b> BPS-15 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> Merit.</p>
26.	<p><b>TWO (02) (LEFTOVER) POSTS OF JUNIOR SCALE STENOGRAPHER.</b></p> <p><b>QUALIFICATION:</b> (i) Intermediate or equivalent qualification from a recognized Board; and (ii) A speed of 60 words per minute in English Shorthand and 35 words per minute in English Typewriting and knowledge of Computer in using MS Word and MS Excels.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> One each to Zone-3 and 5.</p>
<b>LAW, PARLIAMENTARY AFFAIRS AND HUMAN RIGHTS DEPARTMENT</b>	
27.	<p><b>FOUR (04) POSTS OF ADDITIONAL GOVERNMENT PLEADER</b></p> <p><b>QUALIFICATION:</b> At least 2<sup>nd</sup> Class L.L.B Degree or equivalent qualification from recognized University with three years standing at the Bar experience.</p> <p><b>AGE LIMIT:</b> 25 to 35 years. <b>PAY SCALE:</b> BPS-17 <b>ELIGIBILITY:</b> Both Sexes.</p> <p><b>ALLOCATION:</b> One each to Merit, Zone-3, 4 and 5.</p>

<b>PUBLIC SERVICE COMMISSION</b>	
<b>34.</b>	<p><b>ONE (01) (LEFTOVER) POST OF JUNIOR SCALE STENOGRAPHER.</b></p> <p><b>QUALIFICATION:</b> (i) Intermediate or equivalent qualification from a recognized Board; (ii) Minimum speed of fifty 50 words per minute in English Shorthand and thirty five 35 words per minute in English Typing and (iii) Knowledge of Computer in using MS Word and MS Excel.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> Zone-5.</p>
<b>SPORTS, TOURISM, ARCHAEOLOGY, YOUTH AFFAIRS AND MUSEUMS AND DEPARTMENT</b>	
<b>35.</b>	<p><b>ONE (01) (LEFTOVER) POST OF JUNIOR SCALE STENOGRAPHER.</b></p> <p><b>QUALIFICATION:</b> (i) Intermediate or equivalent qualification from a recognized Board with three months duration certificate in Computer basics and (ii) A speed of 50 words per minute in Shorthand and 35 words per minute in Typing.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14 <b>ELIGIBILITY:</b> Male. <b>ALLOCATION:</b> Zone-5.</p>
<b>TRANSPORT AND MASS TRANSIT DEPARTMENT</b>	
<b>36.</b>	<p><b>SIXTEEN (16) POSTS OF ASSISTANT IN DIRECTORATE OF TRANSPORT AND MASS TRANSIT.</b></p> <p><b>QUALIFICATION:</b> At least 2<sup>nd</sup> Class Bachelor's Degree from a recognized University.</p> <p><b>AGE LIMIT:</b> 20 to 32 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> Four to Merit, Three each to Zone-1 and 2 and Two each to Zone-3, 4 and 5.</p>
<b>37.</b>	<p><b>TWO (02) POSTS OF ASSISTANT (FEMALE QUOTA) IN DIRECTORATE OF TRANSPORT AND MASS TRANSIT.</b></p> <p><b>QUALIFICATION:</b> At least 2<sup>nd</sup> Class Bachelor's Degree from recognized University.</p> <p><b>AGE LIMIT:</b> 20 to 32 years. <b>PAY SCALE:</b> BPS-16 <b>ELIGIBILITY:</b> Female. <b>ALLOCATION:</b> Merit amongst Female.</p>
<b>ZAKAT, USHER, SOCIAL WELFARE AND WOMEN DEVELOPMENT DEPARTMENT</b>	
<b>38.</b>	<p><b>TWO (02) (LEFTOVER) POSTS OF STENOGRAPHER.</b></p> <p><b>QUALIFICATION:</b> (i) Second Class Intermediate or equivalent qualification from a recognized Board; (ii) A speed of 50 words per minute in Shorthand in English and 35 words per minute in Typing and (iii) Knowledge of Computer in using MS Word and MS Excel.</p> <p><b>AGE LIMIT:</b> 18 to 30 years. <b>PAY SCALE:</b> BPS-14 <b>ELIGIBILITY:</b> Both Sexes. <b>ALLOCATION:</b> One each to Zone-1 and 5.</p>

**GENERAL CONDITIONS**

- (a) Written Test in the Subject.
- (b) General Knowledge or Psychological General Ability Test.
- (c) Academic and/or Professional record as the Commission may decide.

**SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.**

- (1) Main Branches of:  
Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra
- (2) Saddar Road Branch, Tehkal Payan Branch, G.T Road (Nishtar Abad) Branch and University Campus Branch Peshawar.
- (3) Tehsil Bazar Branch Charsadda. Nowshera Cantt: Branch, Bank Square Branch Mingora and City Branch Tank

**Note:** -The candidate who apply for the post(s) are advised to make sure that they are eligible for the post in all respects because eligibility of the candidate will be determined strictly according to the rules after conduct of all essential tests.

**Secretary**  
Khyber Pakhtunkhwa  
Public Service Commission  
Peshawar

19

ANNEXURE  
cc B 33

Sys SSSECTION-PC

**REGISTERED**  
**Interview Call Letter**

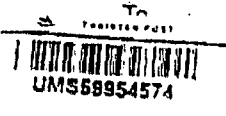


Phone : 091-9213760, 9213563  
Ext : 400  
Website : [www.kppsc.gov.pk](http://www.kppsc.gov.pk)

**KHYBER PAKHTUNKHWA**  
**PUBLIC SERVICE COMMISSION**  
2-Fort Road, Peshawar Cantt.

No. PSC/SR-II/ 04710  
Dated : 21/2/2018

Post Paid Booked  
Peshawar G.P.O



FURQAN SHAFI S/O MOHAMMAD SHAFI  
231 A, KHADIM HUSSAIN ROAD, CHAKLALA CANTT, RAWALPINDI

Subject : **RECRUITMENT TO TWO (02) POST(S) OF PLANNING OFFICER (BPS-17) IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT (ADVT: NO. 06/2016, S.NO. 6)**

In response to your application for the subject cited post(s), you are provisionally called for interview in the Commission's Office at 2-Fort Road, Peshawar Cantt. (Near Governor House) at **08:30 A.M** on **Thursday, 01 March, 2018** for Oral Test (interview). Please bring original certificates, degrees and testimonials which will be returned to you on conclusion of your interview.

2. You should rectify the following ticked deficiencies if any, **Three (03) days** before the interview positively, failing which the Commission will reject your application and shall not interview you for the above post:-

Attested copy of:

1	Original and provisional certificates of SSC/FA/FSC.
2	Original and provisional degree of Bachelor / Master / B.Ed / M.Ed / M.Phil / PhD.
3	Character certificate(s) from two responsible persons and also from the institution last attended.
4	Your / Husband 's Domicile Certificate.
5	CNIC / three photographs.
6	Departmental Permission Certificate from the competent authority.
7	Column No.s _____ of the application form unfilled.
8	All Detail Marks Certificate (s).
9	
10	
11	

(Superintendent)

(23)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
PLANNING & DEVELOPMENT DEPARTMENT

Annexure

SUMMARY FOR CHIEF MINISTER, KHYBER PAKHTUNKHWA.

SUBJECT: INCLUSION/EXCLUSION OF VARIOUS PLANNING RELATED POSTS  
IN THE SCHEDULE OF PROVINCIAL PLANNING SERVICE CADRE.

In order to settle the anomalies arising out in the wake of promulgation of the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2018, a Ministerial Committee was constituted. The Committee submitted its recommendations to Provincial Cabinet and recommended that all the positions created by Finance Department for all the regularized projects under the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2018 shall be created/ placed at the strength of attached formations of respective Administrative Departments except the positions of Planning Cells which fall under the Provincial Planning Service (PPS) and Engineering Wing of Sports Department (Annex-I).

The Provincial Cabinet in its meeting held on 09.05.2019 approved the following recommendations of the Ministerial Committee (Annex-II):

All the positions created by Finance Department for all the regularized projects under the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2018 shall be created/ placed at the strength of attached formations of respective Administrative Departments except the positions of Planning Cells.

In light of the above decision, P&D Department constituted a Scrutiny Committee with following TORs (Annex-III):

- i. Assess the service documents of the employees of erstwhile P&D Department (FATA).
- ii. Submit proposals for the way forward of their adjustment in PPS Cadre.
- iii. Submit proposal for determination of their seniority into PPS Cadre.
- iv. Any other relevant aspect in the wake of adjustment of the employees of P&D Department (FATA) into main P&D Department.

ANNEX-IV

ANNEX-III

ANNEX-II

ANNEX

iv. Shall recommend inclusion/exclusion of different planning related officers requests into PPS received to this Department from various Planning Cells and Departments

4. Meetings of the Committee were held on 07/05/2019, 25/06/2019, 28/05/2019, 16/07/2019, 23/07/2019, 26/07/2019, 09/08/2019 and 29/08/2019 on the issues and in each meeting requests of Administrative Departments/Attached Departments including P&D Department, Merged Areas (erstwhile FATA Secretariat) as well as requests of individuals were discussed. The report of the Committee is at Annex-IV.

5. It is relevant to add that recommendations of the Ministerial Committee regarding placement of the positions of Planning Cells in PPS Cadre are clear while there is lacuna in the decision of Provincial Cabinet regarding inclusion of positions of Planning Cells in PPS Cadre. Moreover, there is no mention of the name of following projects of P&D Department regularized under the Act (bid):

- i. Capacity Building of Planning & Development.
- ii. Establishment of M&E System in Khyber Pakhtunkhwa.
- iii. Sustainable Development Unit, P&D Department.
- iv. Urban Policy Unit, P&D Department.

6. Since the decision of the Provincial Cabinet is not clear, therefore, P&D Department proposes that planning related positions in BS-17 and above created by Finance Department in the Planning Cells of Administrative Departments and four above mentioned Cells/Units of P&D Department may be included in the schedule of the PPS Cadre.

7. Chief Minister, Khyber Pakhtunkhwa is requested to approve placement of the proposal of P&D Department contained in para-6 above before the Provincial Cabinet for its approval.

*(Signature)*  
15/11/19

(ATIF RAHMAN)  
SECRETARY, P&D DEPARTMENT

CHIEF SECRETARY  
KHYBER PAKHTUNKHWA





(22)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
PLANNING & DEVELOPMENT DEPARTMENT

No. SO(E)P&D/19-37/PPS/2019/Vol-II.  
Dated Peshawar, May 17, 2019.

To

All Administrative Secretaries to,  
Government of Khyber Pakhtunkhwa.

Annexure  
cc D 37

Subject: **INCLUSION OF PLANNING RELATED POSTS IN BPS-17 AND ABOVE  
IN THE SCHEDULE OF PPS CADRE.**

Dear Sir,

I am directed to refer to the subjects cited above and to request to provide data of planning related posts/ Officers in BPS-17 and above of your respective Department as per enclosed format at the earliest for placement before a committee for its assessment/ suitability for inclusion in schedule of PPS Cadre, please.

Yours faithfully,

( IHSAN ULLAH )  
Section Officer (Estt)

**Endst No. & Date of Even**

Copy forwarded to the:-

1. Director General, SDU, P&D Department.
2. Director General, Establishment of M&E.
3. Executive Director, Urban Policy Unit.
4. Accounts Officer, CBP, P&D Department.
5. PA to Additional Secretary, P&D Department.
6. PA to Deputy Secretary (Admn:), P&D Department.

They may also provide the requisite details on prescribe format, please.

Section Officer (Estt)

DETAILS OF INFORMATION OF PLANNING RELATED OFFICERS IN BS-17 AND ABOVE OF PLANNING CELLS OF  
ALL ADMINISTRATIVE DEPARTMENTS

S #	Name of Officer	Designation with BPS	Qualification	Parent Deptt.	Date of Birth	Date of 1 <sup>st</sup> entry into Govt. Service	Date of regular promotion in present grade.	Whether Secretariat/ Attached Deptt employee.	Job Description	Remarks
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93

To

The Section Officer (Estt),  
P&D Department, Government of Khyber Pakhtunkhwa

**Subject: Departmental Appeal Against Notification No.SO (E)P & D/071/19-39/2019 Dated January 9, 2020.**

Reference to the subject cited above and yours letter No.SO (E)P & D/071/19-39/2019 Dated January 9, 2020, it is graciously submitted that the Notification is without lawful authority adverse and detrimental upon the rights of the Applicant. That various non-Cadre employees have been merged in PPS Department which has affected the seniority of the Appellant. That applicable legal framework was not implied vis-à-vis Working of The Provincial Rules of Business.. Any deviation from the Rules of Business, is fatal to the exercise of the executive power the principle laid down in the judgment of the honorable Supreme Court Of Pakistan in his judgment, was 'fatal to the exercise of executive power' is against the principle Laid Down in Judgment of the Honorable Supreme Court of Pakistan. That the ibid notice is arbitrary in nature , issued in haste ,not approved by then Provincial Cabinet and hence without lawful authority.

*That the impugned impugned notification is ultra vires to the of the undersigned, including inter alia, Article 4, 9, 10-A, 18 and 25 of the Constitution of Islamic Republic of Pakistan, 1973 (hereinafter the "Constitution");*

Subsequently, the honorable Supreme Court's decision dated 12-06-2013 which has been circulated to all the provinces by Establishment Division has declared the following practices as illegal (**Attached at F/A**).

- a. A civil servant who after passing the competitive exam in terms of the recruitment rules, is appointed on merits, loses his right to be

considered for promotion, when an employee from any other organization is absorbed with competing or undertaking competitive process with the backdated seniority and is conferred the status of a civil servant in complete disregard of recruitment rules.

- b. Absorption of non-civil servant conferring on him status of a civil Servant and likewise absorption of a Civil Servant from non-cadre post to cadre post without undertaking the competitive process under the recruitment rules.
- c. Benefit of 'absorptions' extended, with or without backdated seniority, are declared ultra vires of the constitution.
- d. The absorption and out of turn promotion will also impinge on the self-respect and dignity of the civil servants, who will be forced to work under their rapidly and unduly promoted fellow officers, those who have been inducted from other services/ cadres regardless of their (inductees) merit and results in the competitive exams (if they have appeared for exam at all), hence are violative of Article 14 of the Constitution.
- e. Any induction whether of planning oriented or non planning regularized components /individuals made in PPS department in pursuance of the ibid notification be cancelled and declared null and void.
- f. Any backdated seniority cannot be granted to any absorbed and his inter-se-seniority, on absorption in the cadre shall be maintained at the bottom as provided under the Rules regarding the seniority.

That certain number of employees have been merged In PPS department in purview of the ibid notification , in consequence of which rights of the appellant has been violated and the seniority list issued in this regard is utter derogation from the principle of natural justice and standards set by the Apex Courts in various Judgments.

That the undersigned had a legitimate expectation to be considered higher in seniority list due to the fact that he has been inducted through Public Service commission Competitive Exams.

It is an inalienable right of the undersigned to enjoy equal protection of law and to be treated in accordance with law as per the mandate of Article 4 of the Constitution. The expression "law" has been liberally interpreted by the superior Courts and includes that Departments to comply with the requirements of law while making administrative decisions.

That the superior Courts have consistently held that Article 9 of the Constitution has a wide import. It simply does not cater to the life on vegetative stage, but in fact, it includes, all the amenities, essentials, things and means necessary to live a fuller and a healthy life. A gainful employment as well as consideration in seniority list of the service is legitimately attracted within the purview of Article 9 of the Constitution.

That the superior Courts have consistently held that the seven instruments that are most useful in structuring of discretionary power in Services matters are: open plans, open policy statements, open rules, open findings, open reasons, open precedents and fair and informal procedures. In the instant matter, the impugned seniority list violates the principles developed by the superior Courts on the exercise of discretion.

It is therefore most graciously submitted that seniority list of the regular staff of PPS Cadre given in Schedule-I of the Khyber Pakhtunkhwa Provincial Planning Service Rules, 2018 may be finalized as per established criteria and laws in vogue. That Apex courts have rendered Guidelines in this regard. Moreover, other employees regularized through employees

regularization Act 2018 may kindly be kept at bottom and the tentative seniority list be issued on 23-02-2020 and may be circulated for indicating error/omission.

(Furqan Shafi)  
PPS-17  
ST&IT

Department

26-02-2020

Copy to:

1. PS to Additional Chief Secretary, P&D Dept. Khyber Pakhtunkhwa
2. PS to Secretary, P&D Dept. Khyber Pakhtunkhwa
3. PA to Additional Secretary-I & II, P&D Dept. Khyber Pakhtunkhwa
4. PA to Deputy Secretary, P&D Dept. Khyber Pakhtunkhwa



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
PLANNING & DEVELOPMENT DEPARTMENT**

Dated Peshawar January 09, 2020.

**NOTIFICATION**

**No. SO/EP&D/07/19-39/2019.** In pursuance of the decision of the Provincial Cabinet dated 06/05/2019 and the establishment of Provincial Planning Cadre, the competent authority is pleased to include all planning oriented posts in BPS-17 and above of newly regularized components/units of Planning & Development Department and Planning Cells of Administrative Departments/Civil Secretariat along with incumbents as well as leftover posts as per appendix in the Schedule-I of The Khyber Pakhtunkhwa Provincial Planning Service Rules, 2018.

The competent authority is further pleased to exclude the following posts of Rescue-1122 from the schedule-I of The Khyber Pakhtunkhwa Provincial Planning Service Rules, 2018:

- i. Director Planning (BS-19) (1 post)
- ii. Deputy Director Planning (BS-18) (1 post)
- iii. AD Planning (BS-17) (2 posts)

**CHIEF SECRETARY  
KHYBER PAKHTUNKHWA**

**Ends of even No. & Date**

Copy forwarded to the

1. Principal Secretary to Governor, Khyber Pakhtunkhwa
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
3. All Administrative Secretaries in Khyber Pakhtunkhwa
4. Accountant General, Khyber Pakhtunkhwa, Peshawar
5. Director General, Sustainable Development Unit, P&D Department
6. Executive Director, URU, P&D Department
7. Director General, M&E, P&D Department
8. Director General, Rescue-1122, Peshawar
9. PSO to Chief Secretary, Khyber Pakhtunkhwa
10. Director, Information, Khyber Pakhtunkhwa
11. Deputy Secretary (Admin.), P&D Department, Merged Areas
12. Assistant Chief (B&A), P&D Department
13. Accounts Officer, CBF, P&D Department
14. PS to Additional Chief Secretary, P&D Department
15. PS to Secretary, P&D Department
16. PA to Additional Secretary/Chief Economist, P&D Department
17. PA to Deputy Secretary (Admin.), P&D Department

  
**SONA KHANI**  
Section Officer (Estt)

24  
Annexure  
CE

25



GOVERNMENT OF KHYBER PAKHTUNKHWA  
PLANNING & DEVELOPMENT DEPARTMENT

No. SO(E)P&D/3-4/SLs/PPS/2020.  
Dated Peshawar, February 20, 2020.

To

1. All concerned Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
2. Executive Director, Urban Policy Unit (UPU), P&D Department.
2. Director General, Sustainable Development Unit (SDU), P&D Department.
3. Director General, M&E, P&D Department.
5. Director General (Projects), P&D Department. Merged Areas.
6. All concerned Deputy Commissioners, Khyber Pakhtunkhwa.
7. All Chief of Sections, P&D Department.

Subject: **TENTATIVE SENIORITY LIST OF PROVINCIAL PLANNING SERVICE OFFICERS (PPS BS-17).**

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith a copy of tentative seniority list of PPS BS-17 Officers alongwith certificate proforma with the request that the same may be circulated amongst the PPS BS-17 Officers working in your respective department/District/Office.

I am further directed to request you to direct all concerned that the certificate may be returned to this department duly signed, indicating error/omission, if any, for the purpose of rectification alongwith attested supporting documents **within 15 days (upto 05.03.2020) positively** In case of receipt of no response by the due date, it would be presumed that particulars have been accepted as correct.

Yours faithfully,

Encl: As above.

(SONA KHAN)  
Section Officer (Estt.)

Encl: Number & Date even.

Copy forwarded to the:

1. PS to Additional Chief Secretary, Khyber Pakhtunkhwa.
2. PS to Secretary, P&D Department.
3. PAs to Additional Secretary-I/Deputy Secretary-II, P&D Department
4. Mr. Riaz Ahmad, Resource Centre, for uploading the same on the official website of P&D Department.

Section Officer (Estt.)



26

## CERTIFICATE

Subject: TENTATIVE SENIORITY LIST OF PROVINCIAL PLANNING SERVICE  
(PPS) OFFICERS PPS BS-17 AS STOOD ON 20-02-2020.

It is certified that I have gone through my particulars mentioned at Sr. No. \_\_\_\_\_ of the tentative seniority list of PPS Officers BS-18 and found them correct, except at the following columns:-

S.#	Column No.	Present entry	To be replaced by	Remarks.

The following discrepancies are also brought into the notice:-

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

Note: Additional sheet may be used, if required, please.

Name: \_\_\_\_\_

PPS BS-17 \_\_\_\_\_

Designation \_\_\_\_\_

Date: \_\_\_\_\_

(27)

## TENTATIVE SENIORITY LIST OF PPS BS-17 OFFICERS AS STOOD ON 20.02.2020

S#.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 <sup>ST</sup> ENTRY INTO GOVT. SERVICE.	DATE OF APPOINTMENT/PROMOTION TO THE PRESENT SCALE/POST	BPS	DATE OF ENTRY INTO PPS CADRE	METHOD OF RECRUITMENT/ APPOINTMENT	PRESENT POSTING WITH DATE.	REMARKS IF ANY.
1.	<u>Muhammad Asad Alizai.</u> B.Sc (Engineering)	<u>26-12-1972</u> Haripur	13-01-1998	01-07-2001	BS 17		Absorbed	Planning Officer, Haripur (24-02-2017)	Personally Up-Graded to BPS-13
2.	<u>Muhammad Umair.</u> B.Sc (Agricultural Engineering)	<u>07-03-1971</u> Mardan	01-09-1996	29-06-2002	BS 17		Absorbed	Planning Officer, Dera Ismail Khan (15-02-2013)	Personally Up-Graded to BPS-18
3.	<u>Muhammad Imran Khan.</u> B.Sc (Agricultural Engineering)	<u>01-01-1961</u> North Waziristan	23-01-1988	10-08-2002	BS 17		Absorbed	Planning Officer, Bannu. (15-02-2013)	Personally Up-Graded to BPS-18
4.	<u>Muhammad Riaz Khan.</u> M.A (Political Science)	<u>08-11-1963</u> Lakki Marwat	14-01-1990	26-02-2005	BS 17		Absorbed	Planning Officer, Lakki Marwat (15-02-2013)	Personally Up-Graded to BPS-18
5.	<u>Syed Bilal Khisro.</u> M.A.(Economics)	<u>04-07-1970</u> Charsadda	19-07-2005	19-07-2005	BS 17		Absorbed	Project Director, Innovative Ideas, SDU P&D Deptt on deputation. (17-05-2017)	
6.	<u>Mr. Atiq-ur-Rahman.</u> M.Sc (Statistics)	<u>01-01-1961</u> Mansehra	06-11-1988	23-04-2007	BS 17		Absorbed	Planning Officer, Mansehra (15-02-2013)	Personally Up-Graded to BPS-18
7.	<u>Mr. Sarfraz Khan.</u> M.Sc (Statistics)	<u>25-07-1961</u> Malakand	06-11-1988	06-04-2007	BS 17		Absorbed	Assistant Director, Local Govt. Deptt. at Malakand (19-03-2019)	Personally Up-Graded to BPS-18
8.	<u>Muhammad Adnan.</u> M.B.A/ M.Sc (Economics)	<u>31-05-1985</u> Peshawar	21-05-2014	21-05-2014	BS 17		Initial recruitment	Planning Officer Environment Department (07-01-2019)	
9.	<u>Mrs. Samina Gul.</u> M.Sc (Statistics)	<u>11-07-1985</u> Nowshera	15-06-2014	15-06-2014	BS 17		Initial recruitment	Planning Officer Health Department (16-06-2014)	

	<u>Mr. Baitullah</u> M.Sc (Statistics)	<u>15-05-1988</u> Furrah	16-06-2014	16-06-2014	BS 17		Initial recruitment	Planning Officer, Health Department (16-06-2014)
11	<u>Mr. Baitullah</u> M.Sc (Economics)	<u>27-01-1982</u> South Waziristan	01-07-2015	01-07-2015	BS 17		Initial recruitment	Planning Officer, Social Welfare Department (01-07-2015)
12	<u>Mrs. Romana Sarwar</u> M.Com	<u>27-01-1987</u> Nowshera	31-05-2016	31-05-2016	BS 17		Initial recruitment	Statistical Officer, E&SE Department (31-05-2016)
13	<u>Faizullah Tariq</u> M.A (Economics), M A (Political Science)	<u>26-12-1983</u> Karak	09-11-2016	09-11-2016	BS 17		Initial recruitment	Planning Officer, Information Department (12-02-2019)
14	<u>Mr. Hafeez Ahmad</u> M.Sc (Economics)	<u>10-04-1977</u> Bannu	13-03-2017	13-03-2017	BS 17		Initial recruitment	Research Officer (Water), P&D Deptt. (12-02-2019)
15	<u>Mr. Noman</u> M.Sc (Economics), M.S (Project Planning & Management)	<u>24-03-1984</u> Swabi	13-03-2017	13-03-2017	BS 17		Initial recruitment	Planning Officer, Health Department (13-03-2017)
16	<u>Mr. Kaleem Ullah</u> M.Phil (Economics)	<u>03-07-1989</u> Peshawar	13-03-2017	13-03-2017	BS 17		Initial recruitment	Planning Officer, Sports Department (12-02-2019)
17	<u>Mr. Razauilah</u> M.Sc (Economics)	<u>12-10-1987</u> Nowshera	04-10-2017	04-10-2017	BS 17		Initial recruitment	Research Officer (RD), P&D Deptt. (10-10-2019)
18	<u>Muhammad Umar</u> B.Sc (Economics)	<u>10-11-1982</u> Peshawar	30-10-2017	30-10-2017	BS 17		Initial recruitment	Research Officer, industries Department (30-10-2017)
19	<u>Mr. Imran Zahoor</u> B.Sc (Computer Engineering)	<u>15-02-1990</u> Mardan	13-03-2018	13-03-2018	BS 17		Initial recruitment	Deputy Director ( Projects), P&D Deptt: on deputation. (18-02-2019)
20	<u>Mr. Waqas Ayub</u> B.S (Telecommunication Engineering)	<u>11-03-1982</u> Peshawar	15-03-2018	15-03-2018	BS 17		Initial recruitment	Planning Officer, ST&IT Department (15-03-2018)
21	<u>Muhammad Anwar</u> B.Sc (Hons) (Computer Science)	<u>15-04-1986</u> South Waziristan	16-04-2018	16-04-2018	BS 17		Initial recruitment	Planning Officer, ST&IT Department (16-04-2018)

22	<b>Ms. Saadia Rehman.</b> M.Sc (Economics), M Phil (Economics) Economics)	14-04-1989 Abbottabad	29-10-2018	29-10-2018	BS 17		Initial recruitment	Planning Officer, Minerals Development Deptt (08-11-2018)
23.	<b>Mr. Furgan Shafi.</b> M.B.A (Marketing), M Sc (International Business)	06-03-1987 Tank	29-10-2018	29-10-2018	BS 17		Initial recruitment	Research Officer, (Agriculture), P&D Department (08-11-2018)
24.	<b>Mr. Faridullah.</b> M.A (Economics)	30.06.1973 SWA	27-09-2011	27-09-2011	BS 17	22-03-2019	By Inclusion	Agency Planning Officer, District Khyber
25.	<b>Muhammad Hamid.</b>	03.12.1978 FR Kohat	27-09-2011	27-09-2011	BS 17	22-03-2019	By Inclusion	Agency Planning Officer, District Khyber.
26	<b>Muhammad Rehman.</b> MBA.	07.10.1979 Orakzia	27-09-2011	27-09-2011	BS 17	22-03-2019	By Inclusion	Agency Planning Officer, Orakzai.
27.	<b>Mr. Miftah Ullah.</b> MBA	12.03.1978 SW	27-09-2011	27-09-2011	BS 17	22-03-2019	By Inclusion	Agency Planning Officer, District Bajaur
28.	<b>Mr. Faqir Muhammad.</b> MBA	02.01.1980 NW	27-09-2011	27-09-2011	BS 17	22-03-2019	By Inclusion	Agency Planning Officer District NW
29.	<b>Mr. Israr Ahmad Khan</b> MA (Economics)	07.01.1979 S.W	27-09-2011	27-09-2011	BS 17	22-03-2019	By Inclusion	Agency Planning Officer, District SW
30	<b>Aamir Basim Choznavi</b> MA (Economics).	04-01-1966 Peshawar	07-02-1995	01-05-2006	BS-17	09-01-2020	By Inclusion	Research Officer (Coordination), P&D Department (3-02-2019)
31.	<b>Mr. Rizwan Javed.</b> M B.A (Marketing)	23-03-1975 Bannu	30-05-2011	30-05-2011	BS-17	09-01-2020	By Inclusion	Agri Business Officer-I, Agriculture Department (30-05-2011)
32.	<b>Syed Ishfaq Ahmad.</b> M.Sc (Hons) Agricultural & Applied Economics	28-03-1986 Haripur	06-05-2015	06-05-2015	BS-17	09-01-2020	By Inclusion	AD Planning/ Agri- Business Officer-II, Agriculture Deptt (06-05-2015)

33.	<u>Engr. Nasir Khan.</u> B Sc (Civil)	<u>21-12-1975</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief (Infra:) (OPS), P&D Deptt (05-09-2016)
34.	<u>Mr. Faaiz Arbab.</u> MBA	<u>13-06-1980</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief, (Water) (OPS), P&D Department (12-02-2019)
35.	<u>Engr. Naveed Ishtiaq.</u> B.S (Civil Engineering)	<u>28-05-1981</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief (Health) (OPS), P&D Department. (31-01-2018)
36.	<u>Mr. Ali Hussain.</u> M.Com/ M.B.A	<u>22-02-1983</u> Kurram	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer, SLMP-II, P&D Deptt: on deputation. (15-08-2018)
37.	<u>Mr. Waqas Ghaus.</u> MBA (HR)	<u>21-01-1984</u> Swabi	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief (OPS), P&D Deptt: (16-10-2018)
38.	<u>Engr. Muhammad Tariq.</u> B.S (Civil Engineering)	<u>01-05-1970</u> Malakand	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Infrastructure), P&D Department
39.	<u>Mr. Shahbaz Khan.</u> M.B.A	<u>28-10-1986</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer, (PPP), P&D Deptt. (30-09-2019)
40.	<u>Mr. Junaid</u> B.S (Sociology)	<u>09-11-1989</u> Dir Lower	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief, (OPS), (CPEC CELL), P&D Deptt: (23-01-2020).
41.	<u>Muhammad Irfan.</u> M.B.A	<u>10-02-1982</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Accounts Officer (C.B.F), P&D Department (11-04-2014).
42.	<u>Pir Bilal Muhammad.</u> B S (I.T)	<u>01-12-1980</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (PPP Unit), P&D Department (23-09-2019).
43.	<u>Mr. Tahir Aman.</u> M.B.A	<u>29-10-1981</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (PSDP), P&D Department. (03-03-2012).

44.	<u>Mian Ayub Gul,</u> M.B.A	<u>14-03-1964</u>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief (CPEC) (OPS), P&D Department (28-01-2020)
45.	<u>Mr. Asim Javed,</u> M.B.A	<u>29-09-1979</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (BOS), P&D Department (01-06-2015)
46.	<u>Arbab Muhammad Taimur,</u> M.S	<u>10-04-1984</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Water), P&D Department (23-11-2018)
47.	<u>Engr. Yasir Adnan,</u> B.Sc (Electrical Engineering)	<u>11-09-1987</u> Bannu	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Industries), P&D Deptt: (28-09-2017)
48.	<u>Ms. Zainab Khatoon</u> M.Sc (Economics)	<u>12-02-1977</u> Karak	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief (OPS), (Foreign Aid) P&D Deptt: (16-08-2017)
49.	<u>Syed Shoaib Ali Shah,</u> M.B.A	<u>29-03-1973</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Senior Planning Officer (OPS), Sports Department (07-01-2019)
50.	<u>Muhammad Shoaib,</u> M.Com	<u>11-04-1986</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Education), P&D Deptt: (31-01-2018)
51.	<u>Muhammad Tariq,</u> M.B.A	<u>04-04-1985</u> Mohmand	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Rule of Law), P&D Deptt: (08-06-2018)
52.	<u>Mr. Mukhtar Ahmad,</u> M.Sc (Hons)	<u>14-01-1970</u> Malakand	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Chief(OPS) (Coord), P&D Deptt: (03-04-2019)
53.	<u>Muhammad Shah Khan,</u> M.S (Management Sciences), Master's in Public Administration	<u>26-03-1977</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Local Government Department (29-01-2015).
54.	<u>Mr. Jamshed Akram,</u> B.Sc (Civil Engineering)	<u>20-02-1978</u> Tank	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	M&E Officer (Technical) E&SE Department (11-04-2016)

55	<u>Mr. Taj Muhammad Khan.</u> Bachelor in Civil Technology (Hons)	<u>01.06.1977</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	M&E Officer, (Technical) E&SE Department (24-03-2016).
56	<u>Mr. Mubashar Muzaffar.</u> B.Sc (Civil Engineering)	<u>01-09-1975</u> Mansehra	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	M&E Officer, (Technical) E&SE Department (28-04-2016).
57	<u>Mr. Arif Ullah Shah.</u> M.Sc (Electrical Engineering)	<u>20-12-1978</u> Lakki Marwat	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Energy & Power Department (31-05-2010).
58	<u>Engr. Qazi Muhammad Zohaib.</u> M.B.A	<u>02-01-1986</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Education), P&D Department (23-11-2018)
59	<u>Mr. Hizbulah Khan.</u> M.B.A	<u>10-05-1982</u> Charsadda	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Health), P&D Department (28-02-2018)
60	<u>Muhammad Khanan.</u> B.SC (Civil Engineering)	<u>03-04-1983</u> Hangu	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Civil Engineer, Food Department (08-08-2012)
61	<u>Haseeb Ullah Khan</u> M.S/ M.Phil (Economics)	<u>31-03-1984</u> Charsadda	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Economist, Food Department (15-01-2018)
62	<u>Mr. Changaiz Alam Durrani.</u> M.B.A (HRM)	<u>15-04-1984</u> Charsadda	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Deptt: (01-04-2009)
63	<u>Pir Muhammad Raza Shah.</u> M.Sc (Hons) Agriculture, P.G.D (Project Management) U.K	<u>21-01-1978</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Deptt: (16-04-2009)
64	<u>Mr. Ejaz Hamid.</u> M.Sc (Hons) Agriculture, M.A (Sociology)	<u>19-03-1977</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (09-04-2009)
65	<u>Mr. Kamran Ali Khan.</u> M.B.A (Marketing)	<u>14-07-1979</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (Evaluation) M&E, P&D Department (01-04-2009)

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66	<u>Ms. Shaista Qaiser.</u> M.Sc (Hons) Agriculture	<u>09-03-1979</u> Karak	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director, (M&E), P&D Deptt: (20-04-2009)
67	<u>Mr. Khurshid Alam.</u> M.Sc (Hons) Agriculture	<u>20-07-1976</u> Bajaur	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director, (M&E), P&D Deptt: (22-01-2010)
68	<u>Mr. Asrar Ahmad.</u> B.E (Civil Engineering)	<u>30-03-1982</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director, (M&E), P&D Department (17-09-2012)
69	<u>Mr. Aftab Alam.</u> M.S (GOE Technical Engineering), B.Sc (Civil Engineering)	<u>10-05-1984</u> Charsadda	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director, (M&E), P&D Department (25-09-2012)
70	<u>Mr. Ijaz Ali Shah.</u> B.C.S (Hons) Computer Science	<u>20-12-1984</u>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Energy & Power Department (31-05-2010)
71	<u>Mr. Khurram Shahzad Durrani.</u> M.Sc (Electrical Engineering)	<u>08-02-1976</u>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Energy & Power Department (11-09-2013)
72	<u>Mr. Pir Aimal.</u> M.Sc (Electrical Engineering)	<u>05-04-1984</u>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Energy & Power Department (09-09-2013)
73	<u>Mr. Waqas Ahmad.</u> M.Sc (Electrical Engineering)	<u>20-04-1984</u>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Energy & Power Department (11-09-2013)
74	<u>Mr. Khan Muhammad.</u> M.Sc (Statistics), M.B.A (Finance & Accounting), M.Sc (Economics)	<u>10-04-1985</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Home Department (16-08-2013)
75	<u>Muhammad Kamran.</u> M.B.A (Finance), M.S (Management Sciences)	<u>12-03-1986</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Food Department (16-01-2018)
76	<u>Mr. Kifayat Ullah Khan.</u> M.S (Civil Engineering)	<u>12-05-1986</u> Bannu	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	M&E Officer (Technical) E&SE Department (28-04-2016)



77.	<b>Mr. Safi Ullah.</b> B.Sc (Civil Engineering)	<u>06-02-1986</u> Nowshera	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	M&E Officer. (Tech.), E&SE Department (15-06-2016)
78.	<b>Muhammad Luqman Hakeem Khan.</b> M.Sc (Electrical Engineering)	<u>16-05-1986</u>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Energy & Power Department (09-09-2013)
79.	<b>Muhammad Adeel Khan.</b> B.Sc (Civil Engineering)	<u>03-08-1986</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Deptt. (07-09-2012)
80.	<b>Muhammad Yasir Mahsud.</b> B.Sc (Civil Engineering)	<u>30-12-1985</u> South Waziristan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (09-10-2012)
81.	<b>Mr. Naveed Ullah.</b> B.Sc (Civil Engineering)	<u>01-03-1986</u> Dir Lower	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (15-11-2012)
82.	<b>Mr. Anjad Ali Shah.</b> M.S.T. (Networks)	<u>14-03-1983</u> Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (28-12-2012)
83.	<b>Mr. Tariq Ikram.</b> M.S (Environmental Sciences)	<u>07-07-1987</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (31-12-2012)
84.	<b>Pir Tariq Shah.</b> M.B.A (Marketing)	<u>20-01-1978</u> Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (11-01-2013)
85.	<b>Mr. Sardar Ahmad.</b> P.D (Sociology)	<u>13-12-1967</u> Dir Lower	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Local Govt. Elections & Rural Development Department (30-01-2015)
86.	<b>Engr. Ubaid Khan.</b> B.Sc (Civil Engineering)	<u>01-09-1989</u> Nowshera	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Local Govt. Elections & Rural Development Department (13-05-2015)

87.	<u>Mr. Ozair Rahim.</u> M.B.A	<del>31-12-1987</del>	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer (Foreign Aid, P&D Department (14-04-2014)
88.	<u>Mr. Arbab Wajid Khan.</u> M.B.A	04-07-1987 Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Research Officer, (Power), P&D Department. (08-03-2017)
89.	<u>Mr. Alamgir Khan.</u> B.S (Economics), M.B.A (HRM)	25-03-1988 Manmand	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Monitoring Officer, Sports Department (11-08-2017)
90.	<u>Mr. Wajid Anwar.</u> B.C.S (Computer Sciences)	15-11-1988 Mardan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (03-07-2013)
91.	<u>Mr. Hizbullah Khan.</u> B.E (Chemical Engineering)	01-04-1987 FR Tank	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (02-07-2013)
92.	<u>Mr. Abdul Wadood Shah.</u> B.A	28-07-1982 Bannu	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (01-07-2013)
93.	<u>Engr. Muhammad Awais.</u> B.Sc (Civil Engineering)	28-02-1988 Mansehra	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (05-12-2013)
94.	<u>Mr. Jalal Ahmad.</u> M.B.A/ M.S (Finance)	12-02-1990 North Waziristan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Home Department (22-12-2016)
95.	<u>Muhammad Ismail Mohmand.</u> M.B.A/ M.S (HRM)	05-05-1988 Mohmand	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Planning Officer, Home Department (17-02-2017)
96.	<u>Mr. Fahad Noor.</u> B.Sc (Civil Engineering)	22-02-1990 Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (09-12-2013)
97.	<u>Mr. Ijaz Ahmad Khan.</u> B.Sc (Civil Engineering)	13-05-1982 D.I Khan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Deptt. (09-10-2015)

98	<u>Mr. Aamar Rafiq.</u> B.Sc (Civil Engineering)	19-04-1985 F.E. Bahawalpur	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (29-09-2015)
99	<u>Mr. Zahid Gul.</u> B.Sc (Civil Engineering)	18-04-1985 North Waziristan	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (20-10-2015)
100	<u>Mr. Mujahid Naseer.</u> M.Sc (Construction Engineering), B.Sc (Civil Engineering)	22-03-1983 Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (23-09-2015)
101	<u>Mr. Babar Naseem.</u> M.Sc (GEO Technical Engineering), B.E (Hons) Civil Engineering	12-06-1989 Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (30-09-2015)
102	<u>Mr. Ubaid Ur Rehman.</u> Master's in Public Administration	01-08-1968 Peshawar	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (20-10-2015)
103	<u>Mr. Tahir Hassan.</u> B.B.A (Hons)	05-07-1986 Gita sadda	07-03-2018	07-03-2018	BS-17	09-01-2020	By Inclusion	Assistant Director (M&E), P&D Department (28-01-2016)

F2

(33)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
PLANNING & DEVELOPMENT DEPARTMENT

No. SO(E)P&D/3-4/SLs/PPS/2020  
Dated Peshawar, October 23, 2020.

To

1. All concerned Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
2. Executive Director, Urban Policy Unit (UPIJ), P&D Department.
3. Director General, M&E System, P&D Department.
4. Director General, PERRA, Abbottabad.
5. All concerned Chief of Sections, P&D Department.

Subject: **TENTATIVE SENIORITY LIST OF PROVINCIAL PLANNING SERVICE OFFICERS (PPS BS-18).**

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith a copy of tentative seniority list of PPS BS-18 Officers along-with certificate proforma with the request that the same may be circulated amongst the PPS BS-18 Officers working in your respective department/District/Office.

I am further directed to request you to direct all concerned that the certificate may be returned to this department duly signed, indicating error/omission, if any, for the purpose of rectification along-with attested supporting documents within 30 days (upto 22.11.2020) positively. In case of receipt of no response by the due date, it would be presumed that particulars have been accepted as correct.

Yours faithfully,

Encl: As above.

(SONA KHAN) 23/10/2020  
Section Officer(Estt.)

Endst: Number & Date even.

Copy forwarded to the:

1. PS to Additional Chief Secretary, Khyber Pakhtunkhwa.
2. PS to Secretary, P&D Department.
3. PAs to Additional Secretary-I/Deputy Secretary-II, P&D Department.
4. Mr. Riaz Ahmad, Resource Centre, for uploading the same on the official website of P&D Department.

Section Officer(Estt.)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
PLANNING & DEVELOPMENT DEPARTMENT

Dated Peshawar, \_\_\_\_\_/2020

**TENTATIVE SENIORITY LIST OF PPS BS-18 OFFICERS.**

SR. NO.	NAME OF OFFICER WITH ACADEMIC QUALIFICATION	DATE OF BIRTH & DOMICILE	DATE OF 1 <sup>ST</sup> ENTRY INTO GOVT. SERVICE.	REGULAR APPOINTMENT/PROMOTION TO THE PRESENT POST			REMARKS IF ANY.	
				DATE	BPS	METHOD OF RECRUITMENT / APPOINTMENT		
1.	<u>Mr. Abid Noor,</u> M.Sc. (Civil Engineering).	<u>01-08-1966</u> Khyber	18 5 2006	18.5.2006	BS-18	By Initial recruitment	Chief of Section (Water), P&D Deptt. (06.10.2017)	---
2.	<u>Mr. Sher Afzal,</u> M.Sc.	<u>04-06-1963</u> Mohmand	27-09-2011	27-09-2011	BS-18	By Initial recruitment	SPO, Social Welfare Deptt. (08.04.2020)	---
3.	<u>Mr. Ahmad Nawaz,</u> M.B.A	<u>04-03-1967</u> Abbottabad	27-09-2011	27-09-2011	BS-18	By Initial recruitment	Assistant Chief (Agriculture), P&D Department (13-02-2019)	---
4.	<u>Mr. Abdul Wajid,</u> M.B.A (Finance), M.Sc (Economics), M.Phil (Finance)	<u>14-04-1981</u> Mardan	19-08-2016	19-08-2016	BS-18	By Initial recruitment	CPO, Energy & Power Deptt (20-08-2020)	---
5.	<u>Mr. Abdur Rehman,</u> M.B.A	<u>10-02-1969</u> Peshawar	07-03-1990	31-10-2016	BS-18	By promotion	D.S-II (Establishment & Admn.), P&D Department (14-01-2020)	---
6.	<u>Mr. Hamid Naveed,</u> Master's in Public Administration	<u>19-02-1977</u> Swabi	11-01-2017	11-01-2017	BS-18	By Initial recruitment	Chief Planning Officer, Higher Education Deptt. (24-05-2018)	---
7.	<u>Mr. Hidayat Ullah Khan,</u> M B A (Finance).	<u>12-01-1983</u> F.R Bannu	04-06-2011	28-02-2017	BS-18	By Promotion	Senior Planning Officer, E&SE Department (28-02-2017)	---

8.	<u>Syed Qamar Abbas,</u> M.B.A (HRM), M.Phil (Environmental Sciences), M.Sc (Environmental Planning & Management).	<u>01-08-1976</u> Kohat	13-03-2017	13-03-2017	BS 18	By initial recruitment	Director (Technical), Irrigation Department. (09-09-2020)
9.	<u>Engr. Nadir Iqbal,</u> B.Sc (Civil Engineering) and MSc (Water Resources Engineering).	<u>08-10-1979</u> Bannu	13-03-2017	13-03-2017	BS 18	By initial recruitment	Senior Planning Officer, Irrigation Department. (04-08-2004)
10.	<u>Engr. Asif Shahab,</u> M.Sc (Civil Engineering).	<u>25-10-1971</u> Swabi	07-03-2018	07-03-2018	BS 18	By initial recruitment	Chief Planning Officer, Sports Department (12-04-2019)
11.	<u>Mr. Amin Khan Bangash,</u> M.Sc (Statistics).	<u>15-03-1975</u> Hangu	07-03-2018	07-03-2018	BS 18	By initial recruitment	Assistant Chief, (Rule of Law), P&D Department (27-01-2020)
12.	<u>Ms. Palwasha Rehman,</u> M.Sc (Hons).	<u>17-11-1978</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Assistant Chief (PSDP), P&D Department (26-04-2017)
13.	<u>Dr. Kashif Nazir,</u> MBBS.	<u>15-09-1979</u> Mardan	07-03-2018	07-03-2018	BS 18	By initial recruitment	Assistant Chief (Health), P&D Deptt. (01-03-2012)
14.	<u>Mr. Rafiq Jan,</u> M.B.A.	<u>14-02-1979</u> Charsadda	07-03-2018	07-03-2018	BS 18	By initial recruitment	Chief (PPP Cell), P&D Department (18-07-2016)
15.	<u>Mr. Tehsil Zaman,</u> M A (Economics)	<u>09-02-1969</u> FR Bannu	07-03-2018	07-03-2018	BS 18	By initial recruitment	Assistant Chief (Agriculture), P&D Department (10-05-2016)
16.	<u>Muhammad Ayaz,</u> M.Sc (Economics).	<u>04-02-1968</u> Dir Lower	07-03-2018	07-03-2018	BS 18	By initial recruitment	Assistant Chief (Industries), P&D Department (03-03-2012)
17.	<u>Abdul Aziz Abbasi,</u> M A (Social Sciences)	<u>20-04-1962</u> Hangu	07-03-2018	07-03-2018	BS 18	By initial recruitment	Chief (CPEC Cell), P&D Department (23-10-2019)

18	<b>Engr. Saleem Shah</b> M.Sc (Environmental Engineering);	<u>04-01-1976</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (01-04-2009)
19	<b>Mr. Akhtar Shahzad Bangash</b> , M.Sc (Computer Sciences).	<u>04-09-1978</u> Kohat	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (16-04-2009)
20	<b>Mr. Asim Riaz, Muhammad Ali</b> MS-Information Technology (IT).	<u>05-12-1961</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Resource Centre P&D Deptt (22-06-2020)
21	<b>Mr. Hidayat Ullah Khan</b> , M.S (Environmental Engineering).	<u>01-10-1970</u> Bannu	07-03-2018	07-03-2018	BS 18	By initial recruitment	Taxation Analyst-cum-SPO, Excise & Taxation Deptt (10-09-2020)
22	<b>Muhammad Imran Khan</b> , B.Sc (Civil Engineering).	<u>20-09-1972</u> Mohmand	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (27-09-2012)
23	<b>Mr. Aftab Haider</b> , M.Sc (Civil Engineering)	<u>17-09-1976</u> Swabi	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (03-09-2012)
24	<b>Mr. Sikandar Khan</b> , M.Sc (Civil Engineering)	<u>12-04-1980</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), Hazara Division, Abbottabad (10-09-2020)
25	<b>Muhammad Shoaib</b> , M.A (Political Science)	<u>24-04-1977</u> Bannu	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (Evaluation) (M&E), P&D Department (31-12-2012)
26	<b>Mr. Shahzad Khan</b> , M.Sc Civil & Environmental Engineering (Construction Engineering and Management)	<u>03-11-1977</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (03-12-2013)
27	<b>Mr. Ashfaq Khan</b> , M.Sc (Civil Engineering), MPM (Master in Project Management)	<u>12-04-1985</u> Bannu	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (19-12-2013)

35

28.	<b>Mr. Afrasiyab Khattak,</b> M.B.A (Finance), Diploma in Project Management	<u>21-01-1981</u> Nowshera	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (05-10-2015)	
29.	<b>Engr. Alam Zeb,</b> M.Sc (Hons) Agricultural Economics	<u>06-07-1970</u> Nowshera	07-03-2018	07-03-2018	BS 18	By initial recruitment	Deputy Director (M&E), P&D Department (27-01-2016)	
30.	<b>Mr. Hamayun Khan,</b> M.A (Journalism), L.L.B	<u>01-07-1963</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Communication Specialist, (UPU), P&D Department (15-04-2013)	
31.	<b>Ms. Hina Gul,</b> M.Sc (Botany), M.B.A (Management)	<u>23-05-1982</u> South Waziristan	07-03-2018	07-03-2018	BS 18	By initial recruitment	M&E Specialist, (UPU), P&D Department (22-04-2013)	
32.	<b>Syed Nasir Jamil,</b> M.Sc (Geographical Information System) U.K, M.I.T	<u>30-11-1975</u> Peshawar	07-03-2018	07-03-2018	BS 18	By initial recruitment	Sr. GIS Specialist, (UPU), P&D Department (06-05-2013)	
33.	<b>Mr. Riaz Noor,</b> M.B A (Finance)	<u>01-01-1984</u> Nowshera	07-03-2018	07-03-2018	BS 18	By initial recruitment	Urban Economist, (UPU), P&D Department (28-05-2014)	
34.	<b>Mr. Adnan Salim Khan,</b> Master of Applied Environmental Studies U.K, M.Sc (Urban & Regional Planning), M.Sc (Geography)	<u>12-07-1969</u> Malakand	07-03-2018	07-03-2018	BS 18	By initial recruitment	Urban Planner, (UPU), P&D Department (24-06-2014)	
35.	<b>Mr. Sohail Ahmad,</b> M.S (Engineering) U.K	<u>05-12-1980</u> Charsadda	07-03-2018	07-03-2018	BS 18	By initial recruitment	Transport Specialist (UPU), P&D Department (21-10-2014)	
36.	<b>Muhammad Hashim,</b> M.Sc (Statistics)	<u>01-01-1967</u> Karak	24-08-1992	24-01-2019	BS 18	By Promotion	Chief of Section (Industries), P&D Department (07-01-2019)	---
37.	<b>Arch. Abdul Waheed Khan,</b> Bachelor of Archt M B A (Project	<u>27-12-1964</u> Bannu	01-09-1991	24-01-2019	BS 18	By Promotion	Senior Planning Officer, Transport	---

36



	Management). P G D (Inner City Renewal & Urban Heritage and Land Management) The Netherlands						Department (07-03-2018)	
38.	<u>Mr. Abdul Ghaffar,</u> Bachelor of Architectural Engineering	<u>05-05-1962</u> Bajour	11-12-1991	17-05-2019	BS 18	By Promotion	Deputy Chief Planning Officer, Higher Education Department. (24-05-2019)	Regained Seniority w.e.f. 24.01.2019
39.	<u>Mr. Zia-ur-Rehman,</u> M.Sc (Hons)	<u>27-02-1964</u> Abbottabad	31-12-1991	17-05-2019	BS 18	By Promotion	A.D (Senior), Local Govt. Elections & Rural Development Department Abbottabad (17-06-2020)	Regained Seniority w.e.f. 24.01.2019
40.	<u>Muhammad Iqbal,</u> B.Sc (Engineering)	<u>25-09-1967</u> Mohmand	01-11-1993	24-01-2019	BS 18	By Promotion	Deputy Director (Planning), Environment Department (12-02-2019)	---
41.	<u>Mr. Habib Ullah Khan,</u> M.B.A (Finance)	<u>12-09-1965</u> Charsadda	05-10-1995	24-01-2019	BS 18	By Promotion	Assistant Chief (Power), P&D Department (01-01-2019)	---
42.	<u>Muhammad Jaffar,</u> B.Sc (Engineering)	<u>15-11-1965</u> Mohmand	24-03-1992	24-01-2019	BS 18	By Promotion	Director (P&T) PERRA, Abbottabad (12-02-2019)	---
43.	<u>Mr. Mazhar Abbas Baloch,</u> B.Sc (Engineering), M.B.A (Finance)	<u>01-04-1966</u> D.I Khan	21-12-1995	24-01-2019	BS 18	By Promotion	Deputy Director (M&E), D.I.Khan Division, D.I.Khan (10-09-2020)	---
44.	<u>Muhammad Ameer Khan,</u> B.Sc (Engineering)	<u>01-03-1971</u> Peshawar	21-12-1995	24-01-2019	BS 18	By Promotion	Chief of Section (PSDP), P&D Department (23-10-2019)	---
45.	<u>Mr. Sartaj Khan,</u> M.A (Economics), M Phil (Applied Economics)	<u>01-10-1965</u> Mardan	30-10-1990	24-01-2019	BS 18	By Promotion	Assistant Chief (Water), P&D Department (06-10-2017)	---

37

46.	<u>Muhammad Saleem,</u> B Sc (Engineering)	<u>28-03-1962</u> Malakand	10-08-1982	22-10-2019	BS 18	By Promotion	Assistant Economic Advisor, Industries Department (28-06-2019)	Regained Seniority w.e.f. 24.01.2019
47.	<u>Mr. Safdar Ali,</u> B.Sc (Agricultural Engineering)	<u>15-03-1961</u> Mardan	23-01-1988	24-01-2019	BS 18	By Promotion	Deputy Director (P&M), Agriculture Department. (15-04-2019)	---
48.	<u>Mr. Shoukat Ali,</u> B Sc (Agricultural Engineering)	<u>02-11-1962</u> Dir Lower	23-01-1988	24-01-2019	BS 18	By Promotion	Senior Planning Officer, P&M Department (12-02-2019)	---
49.	<u>Mr. Naseer Ahmad,</u> MSc (Agriculture Engineering)	<u>20-08-1966</u> Swat	01-09-1996	22-10-2019	BS 18	By Promotion	Chief Planning Officer, Agriculture Department (24-05-2019)	Regained Seniority 24.01.2019
50.	<u>Mr. Imdad Ullah,</u> M.A (Sociology), M.A (Political Science)	<u>03-10-1965</u> Peshawar	28-12-1994	24-01-2019	BS 18	By Promotion	Senior Planning Officer, E&SE Deptt (22-01-2020)	---
51.	<u>Muhammad Islam,</u> M A (Social Work)	<u>13-04-1966</u> Khyber	15-12-1997	22-10-2019	BS 18	By Promotion	Chief of Section (RD) (OPS), P&D Department (11-09-2019)	Regained Seniority 24.01.2019
52.	<u>Mr. Yousaf Ali,</u> M.Sc (Maths)	<u>16-03-1965</u> Mardan	19-07-2005	24-01-2019	BS 18	By Promotion	Project Director, Assessment Study & Establishment of Mines, Monitoring & Surveillance Unit, Minerals Dev. Deptt (19-06-2020)	---
53.	<u>Muhammad Iqbal,</u> M.A (Economics)	<u>04-11-1960</u> Bannu	06-11-1988	22-10-2019	BS 18	By Promotion	Assistant Chief (Health), P&D Department (01-09-2020)	Regained Seniority 24.01.2019
54.	<u>Mr. Zafarullah Khan,</u> M A (Economics)	<u>28-04-1961</u> Karak	06-11-1988	24-01-2019	BS 18	By Promotion	Project Director, Schools Construction & Rehabilitation Programme (SCRIP)	---

(38)

							through E&SE Deptt on deputation basis. (05-07-2019)	
55.	<u>Mr. Shah Fazil,</u> M B A (Banking & Finance)	<u>01-10-1982</u> Mardan	25-02-2008	22-10-2019	BS 18	By Promotion	Senior Planning Officer, Higher Education Deptt: (22-01-2020)	Regained Seniority 24.01.2019
56.	<u>Muhammad Ayaz,</u> M.Sc (Engineering)	<u>11-05-1975</u> Mehmand	25-02-2008	22-10-2019	BS 18	By Promotion	Assistant Chief (RD) P&D Deptt (14.10.2020)	Regained Seniority 24.01.2019
57.	<u>Mrs. Mehnaz Bibi,</u> M.Sc (Economics)	<u>02-04-1984</u> Bannu	12-02-2011	24-01-2019	BS 18	By Promotion	Economist, Excise & Taxation Department (12-02-2019)	---
58.	<u>Mr. Sami Uddin Bangash,</u> M.S (Finance)	<u>28-11-1984</u> Kurram	16-03-2011	24-01-2019	BS 18	By Promotion	Senior Planning Officer, Local Govt. Elections & Rural Development Department (01-03-2019)	---
59.	<u>Muhammad Imran Kazim,</u> Master's in Public Administration, M.A (Economics)	<u>26-11-1976</u> Peshawar	04-06-2011	24-01-2019	BS 18	By Promotion	Senior Planning Officer, E&SE Department (12-02-2019)	---
60.	<u>Mr. Farhad Ahmad,</u> M.Sc (Computer Science), M.Sc (Economics)	<u>02-03-1980</u> Malakand	04-06-2011	24-01-2019	BS 18	By Promotion	Senior Planning Officer, Health Department (12-02-2019)	---
61.	<u>Mr. Abdul Basit,</u> M.C.S, M.S (Computer Science), M.B.A (HRM)	<u>23-03-1978</u> Peshawar	01-04-2019	01-04-2019	BS 18	By Initial Recruitment	Sr. Planning officer, ST&IT Deptt (14-10-2020)	---

(89)

(40)

10/25  
27/12/2020

To

The Section Officer (Establishment)  
P&D Department, Government of Khyber Pakhtunkhwa

Subject: TENTATIVE SENIORITY LIST OF PROVINCIAL PLANNING SERVICE (PPS BS-17)

Reference to the subject cited above and yours letter no: SO(E)P&D/3-4/SLs/PPS/2020 dated October 23, 2020, it is graciously submitted that the seniority list received to the undersigned vide above reference letter is adverse and is detrimental upon the rights of the Applicant. *As per clause 6 of The Khyber Pakhtunkhwa Employees (Regularization of services) Act, 2018, Seniority.—(1) Except the employees mentioned in the proviso to section 4 of this Act, whose services are to be regulated by their respective laws and rules, all other employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act, shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission or Departmental Selection Committee, as the case may be, made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.* That the seniority list issued is against the spirit of the above mentioned enactment and hence untenable.

*That the impugned seniority list breaches the fundamental rights of the undersigned, including inter alia, Article 4, 9, 10-A, 18 and 25 of the Constitution of Islamic Republic of Pakistan, 1973 (hereinafter the "Constitution");*

Subsequently, the honorable Supreme Court's decision dated 12-06-2013 which has been circulated to all the provinces by Establishment Division has declared the following practices as illegal (Attached at F/A).

- a. *A civil servant who after passing the competitive exam in terms of the recruitment rules, is appointed on merits, loses his right to be considered for promotion, when an employee from any other organization is absorbed with competing or undertaking competitive process with the backdated seniority and is conferred the status of a civil servant in complete disregard of recruitment rules.*
- b. *Absorption of non-civil servant conferring on him status of a civil servant and likewise absorption of a Civil Servant from non-cadre post to cadre post without undertaking the competitive process under the recruitment rules.*

- c. Benefit of 'absorptions' extended, with or without backdated seniority, are declared ultra vires of the constitution.
- d. The absorption and out of turn promotion will also impinge on the self-respect and dignity of the civil servants, who will be forced to work under their rapidly and unduly promoted fellow officers, those who have been inducted from other services/ cadres regardless of their (inductees) merit and results in the competitive exams (if they have appeared for exam at all), hence are violative of Article 14 of the Constitution.
- e. Any backdated seniority cannot be granted to any absorbed and his inter-seniority, on absorption in the cadre shall be maintained at the bottom as provided under the Rules regarding the seniority.

The above decision has also been violated in the seniority list received to the undersigned.

That the undersigned had a legitimate expectation to be considered higher in seniority list due to the fact that he has been inducted through Public Service commission Competitive Exams .

It is an inalienable right of the undersigned to enjoy equal protection of law and to be treated in accordance with law as per the mandate of Article 4 of the Constitution. The expression "law" has been liberally interpreted by the superior Courts and includes that Departments to comply with the requirements of law while making administrative decisions.

That the superior Courts have consistently held that Article 9 of the Constitution has a wide import. It simply does not cater to the life on vegetative stage, but in fact, it includes, all the amenities, essentials, things and means necessary to live a fuller and a healthy life. A gainful employment as well as consideration in seniority list of the service is legitimately attracted within the purview of Article 9 of the Constitution.

That the superior Courts have consistently held that the seven instruments that are most useful in structuring of discretionary power in Services matters are: open plans, open policy statements, open rules, open findings, open reasons, open precedents and fair and informal procedures. In the instant matter, the impugned seniority list violates the principles developed by the superior Courts on the exercise of discretion.

Furthermore, it is also pertinent to mention that induction of the erstwhile FATA Secretariat employees into PPS cadre is also ambiguous and further affecting the seniority of those who have been inducted through Public Service commission.




48

It is therefore most graciously submitted that seniority list of the regular staff of PPS Cadre given in Schedule-I of the Khyber Pakhtunkhwa Provincial Planning Service Rules, 2018 may be finalized as per established criteria and laws in vogue. That Apex courts have rendered Guidelines in this regard. Moreover, other employees regularized through employees regularization Act 2018 may kindly be kept at bottom and the tentative seniority list be issued on 23-02-2020 and may be circulated for indicating error/omission.

*(Furqan Shafi)*  
29/10/2020  
**(Furqan Shafi)**  
Planning Officer  
Higher Education  
Department  
29-10-2020

Copy to:

1. PS to Additional Chief Secretary, P&D Dept. Khyber Pakhtunkhwa
2. PS to Secretary, P&D Dept. Khyber Pakhtunkhwa
3. PA to Additional Secretary-I & II, P&D Dept. Khyber Pakhtunkhwa
4. PA to Deputy Secretary, P&D Dept. Khyber Pakhtunkhwa

قیمت 50 روپے	80412	  
ایڈویکٹ: وقار اورنگزی الہولڈیٹ		
بار کونسل / ایسوسی ایشن نمبر: _____		
رابطہ نمبر: 03177559955		پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: *سید سید نسیم علی شاہ*

مخانب: <i>ایپیلانٹ</i>	دعویٰ: <i>APPEAL</i>
<i>FURQAN SHAFI</i>	علت نمبر: _____
<i>بنام</i>	مورخہ: _____
<i>Govt. OF KHYBER PK ETC</i>	جرم: _____
	تھانہ: _____

**باعث تحریر آگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام *پشاور* کیلئے *وقار اورنگزی الہولڈیٹ* کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے ججائے لقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ لایا کہ سند ہے

*Attested  
by True Copy  
Waqar*

الم رقوم: \_\_\_\_\_

گواہ شد الع بد

مقام *پشاور* کے لیے منظور ہے۔

*Waqar*

FURQAN SHAFI

**"B"**

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

No.

Appeal No.....7270..... of 20 .

Fozgan Shafiq.....Appellant/Petitioner

Versus

Thwayh Shafiq Saye.....Respondent

Respondent No.....5.....

Notice to: - Establishment DEPT Thwayh Secretary  
Establishment DEPT Pesh

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....29-3-22.....at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 18.....

Day of.....22.....20 22

[Signature]  
PS/Secy E&ADKP  
Diary No. \_\_\_\_\_  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



"B"

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

No.

Appeal No. 7570 of 20

Appellant/Petitioner: Farooq Ahmad

Verus

Respondent: Muzaffar Hussain

Respondent No. 2

Notice for: Establishment of Right Through Court  
Establishment of Right

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on ..... at 8.00 A.M. If you wish to urge anything against the appeal/petition you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by Advocate duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish your address and address contained in this notice which the Registrar has in the appeal/petition will be deemed to be your correct address and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of notice is attached. (Signature)

(Signature)

Registrar  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar

The form of attendance in the court must be filed in the court before the date of hearing. Always use the Case No. While making any correspondence.

"B"

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

S.B

No.

7270

21

Appeal No. F-089an Shafi of 20

Appellant/Petitioner

Through chief Versus Secy

Respondent

Respondent No.

Finance Dept Through Secretary

Finance Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....23-2-22.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 16

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20



Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

**"B"**

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

513

No.

Appeal No. 7270 of 20 21

Furqan Shafi Appellant/Petitioner

Through Chief Secy. Pesh Respondent

Respondent No. Govt of KPK Through Chief Secretary  
Peshawar

Notice to:

**WHEREAS** an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 29-3-22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 16

Day of 2 22 20

ISSUE BRANCH  
CHIEF SECRETARY  
Govt of Khyber Pakhtunkhwa  
23-2-22

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No..... of 20

SIB

7270

Appellant/Petitioner

Fuzgan Shafiq

Respondent

Thayy Chief

Respondent No.....

Notice to:

23-2 Law Deptt Through Secretary Law  
4  
Page

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case ~~may be postponed~~ either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is ~~attached~~. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20

2 7270 B  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

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

No.

213

Appel No. .... of 20

Appellant/Petitioner

1270

Respondent

Respondent No.

Furdon

Thakur Chief

Notice to: -

Law Dept. Thakur's Secretary (Law)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented registered for consideration in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on ..... at 8.00 A.M. If you wish to urge anything against the appeal/petitioner you are at liberty to do so on the date fixed, or any other day to which the case is postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purposes of this appeal/petition.

Copy of appeal is filed. Copy of appeal filed in Court on 15/11/74.

Office Notice No. .... dated .....

Given under my hand and the seal of this Court at Peshawar this .....

Registrar  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar

1 The time of attachment in the court shall be the same as that of the High Court on Wednesdays and Gavelled Holidays.  
2 Always quote Case No. While making any correspondence

"B"

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

No.

S.B

Appeal No.....7270..... of 20 21

Furqan Shafi.....Appellant/Petitioner  
Versus

Through Chief Secy.....Respondent  
Respondent No.....3

Notice to: - Planing and Development Dept  
Through Additional Chief Secretary Pesh

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal ~~has already been~~ sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this...15.....

Day of.....20 22

  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

Before the Chairman Khyber Pakhtun Khwa  
Service Tribunal Peshawar.

233  
01/02  
2022

Furqan Shafi versus Govt K.P and other

Respectfully Sheweth:

That above titled appeal is pending  
before this Tribunal and fixed for  
29-03-2022.

Allowed  
01/2/2022

That on previous date vide order  
dated 25-11-2021, the instant appeal  
was admitted and Appellant was  
directed to deposit security and  
process fee within ten (10) days.

The due to Covid situation the Appellant  
was unable to come and deposit fee.

That non compliance of Appellant was  
not intentional.

It is mostly humbly prayed that  
the Appellant be kindly allow to  
deposit security fee and service fee

Appellant.

Dated 1<sup>02</sup>/<sub>2022</sub>

Through Council's Juniors  
Kamran Khan Advocate

