

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.**

Service Appeal No. 7240/2020

Date of Institution ... 09.07.2020

Date of Decision ... 22.11.2022

Ghani-ur-Rehman Belt No. 274 S/O Muhammad Ayub Khan P/O Behram  
Khail Tehsil Takht-e-Nasrati District Karak. ... (Appellant)

**VERSUS**

Inspector General of Police, Khyber Pakhtunkhwa and 01 other:  
... (Respondents)

-----  
MR. ASHRAF ALI KHATTAK,  
Advocate --- For appellant.

MR. MUHAMMAD RIAZ KHAN PAINDAKHEL,  
Assistant Advocate General --- For respondents.

SALAH-UD-DIN --- MEMBER (JUDICIAL)  
MIAN MUHAMMAD --- MEMBER (EXECUTIVE)


**JUDGMENT:**

SALAH-UD-DIN, MEMBER:- According to the averments in the appeal, the appellant was appointed as Constable in Police Department on 25.10.2004. In order to be selected for lower course, a police constable is required to pass B-I examination and his age is not to be beyond the prescribed age limit of 33 years. The appellant was not provided an opportunity to participate in B-I examination in due time and was allowed to appear in such examination in the year 2012, which he passed and secured 2<sup>nd</sup> Position. The appellant was, however not allowed to participate in Lower School Training at PTC Hangu, constraining the appellant to file Writ Petition



No. 3117-P/2013 in the honourable Peshawar High Court, Peshawar.

The said writ petition alongwith other writ petitions were allowed vide judgment dated 28.01.2014 with the directions to the respondents to include name of the appellant in the list of the candidates for the forth-coming course scheduled to be commencing with effect from 01.04.2014. The appellant was then ignored till the year 2018, therefore, he filed contempt of court petition in the honourable Peshawar High Court, Peshawar. It was during hearing of the contempt of court petition on 23.10.2018 that the learned AAG produced order bearing Endorsement No. 9015-22/E-IV dated 22.10.2018, whereby the petitioner was allotted one extra seat in the lower school course. The COC petition was thus disposed of vide order dated 23.10.2018 with the observations reproduced as below:-



*"In view of the above, the COC has served its purpose and is disposed of. However, with the consent of the learned AAG, the words used in respect of "His seniority will be reckoned with his colleagues who will be undergoing the Lower School Course with him. The timings of course shall not violate seniority of others." are deleted, as the same is the job of the Service Tribunal, for which the petitioner is at liberty to approach the said forum."*

The appellant then filed departmental appeal seeking his seniority with his batch mates from the year 2012, however the same was not decided, hence the instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions as raised by the appellant in his appeal.

3. Learned counsel for the appellant has addressed his arguments supporting the grounds agitated by the appellant in his service

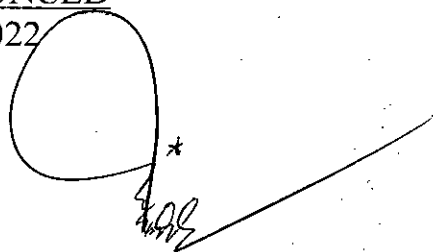
appeal. On the other hand, learned Assistant Advocate General has controverted the arguments of learned counsel for the appellant and has supported the comments submitted by the respondents.

4. Arguments have already been heard and record perused.

5. Keeping in view the respective arguments of both the sides, a perusal of the record would show that correspondence regarding departmental representation/appeal of the appellant was made between offices of Police hierarchy, however the same was not decided one way or the other, constraining the appellant to file the instant service appeal. The issue in question necessitates that the departmental representation of the appellant may first be decided by the concerned appellate Authority. The departmental representation/appeal is thus, remitted to the concerned appellate Authority with the directions to decide the same through a speaking order strictly in accordance with relevant rules/law within a period of 60 days of receipt of copy of this judgment. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

22.11.2022



(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)



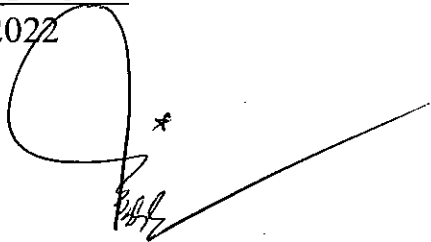
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

ORDER  
22.11.2022

Appellant alongwith his counsel present. Mr. Waqar Ahmad, ASI alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present. Arguments have already been heard and record perused.

Vide our detailed judgment of today, separately placed on file, The departmental representation/appeal is thus, remitted to the concerned appellate Authority with the directions to decide the same through a speaking order strictly in accordance with relevant rules/law within a period of 60 days of receipt of copy of this judgment. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
22.11.2022



(Mian Muhammad)  
Member (Executive)

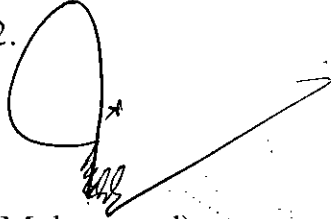


(Salah-Ud-Din)  
Member (Judicial)

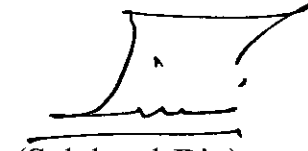
02.11.2022

Appellant alongwith his counsel present. Mr. Waqar Ahmad, ASI alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Arguments heard. To come up for order before the D.B on 04.11.2022.



(Mian Muhammad)  
Member (E)

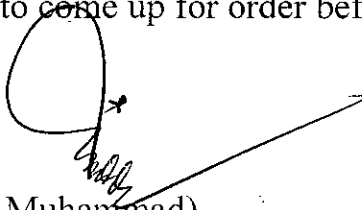


(Salah-ud-Din)  
Member (J)

04.11.2022

Appellant present while his counsel is absent due to strike of lawyers. Mr. Waqar Ahmed ASI alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Appellant submitted copy of judgment dated 24.01.2018 passed by honourable Peshawar High Court, Peshawar in Writ Petition No. 1950-P/2015 which required time for its perusal, therefore, to come up for order before the D.B on 22.11.2022.



(Mian Muhammad)  
Member (E)

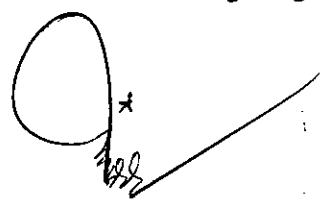



(Salah-ud-Din)  
Member (J)

22.06.2022

Appellant alongwith his counsel present. Mr. Waqar Ahmad, ASI alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested that as he is proceeding for appearance in a case before the Immigration Court, therefore, an adjournment may be granted. Adjourned. To come up for remaining arguments on 08.07.2022 before the D.B.

  
(Mian Muhammad)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

8-7-2022


*Due to Holidays of Eid Ul Azha the case is adjourned to 25-10-2022*

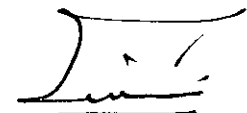
*Reader*

25.10.2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested for short adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for remaining arguments on 02.11.2022 before the D.B.

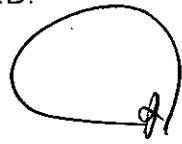
  
(Mian Muhammad)  
Member (E)

  
(Salah-Ud-Din)  
Member (J)

31.01.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment as he has not prepared the brief of the case. Adjourned. To come up for arguments on 03.03.2022 before the D.B.



(Rozina Rehman)  
Member (J)



(Salah-Ud-Din)  
Member (J)

3-3-22

*due to Retirement of the Hon.ble Chairman  
The case is adjourned to come up for the  
same as before on 17-6-22*

*Yousaf  
Reader*

17.06.2022

Appellant alongwith his counsel Mr. Ashraf Ali Khattak, Advocate, present. Mr. Waqar Ahmad, ASI alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present and produced copies of Notification bearing Endorsement No. 2860-08/EC dated 22.03.2012 and Notification No. 604 dated 22.02.2012 alongwith list showing the names of Constables on promotion list B-(I) and their marks calculated in accordance with Standing Order No. 10/1987 and Standing Order No. 01/2004, which are placed on file. Copy of the same handed over to learned counsel for the appellant. Partial arguments heard. To come up for remaining arguments on 22.06.2022 before the D.B.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

28.06.2021

Counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Waqar Ahmad P.S.I for respondents present.

Representative of respondents submitted written reply/comments placed on file. To come up for rejoinder, if any, and arguments on 12.11.2021 before D.B.



(Rozina Rehman)  
Member(J)

12.11.2021

Mr. Ashraf Ali Khattak, Advocate for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant submitted rejoinder which is placed on file and copy of the same is handed over to the learned Deputy District Attorney. Adjourned. To come up for arguments before the D.B on ~~31.01~~ 2022.



(Atiq Ur Rehman Wazir)  
Member (E)




(Salah-ud-Din)  
Member (J)



23.10.2020

Since the Members of the High Court as well as of the District Bar Associations, Peshawar, are observing strike today, therefore, learned counsel is appellant is not available today. Adjourned to 31.12.2020 on which date file to come up for preliminary hearing before S.B.

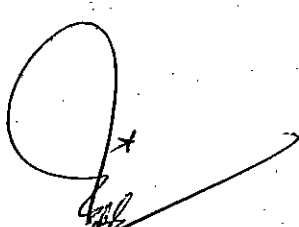
  
(Muhammad Jamal Khan)  
Member (Judicial)

31.12.2020

Nemo for the appellant present.

Notices be issued to the appellant and his counsel for preliminary hearing.

Adjourned to 25.03.2021 before S.B.

  
(Mian Muhammad)  
Member(E)

25.03.2021

Appellant with counsel present. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to the respondents. To come up for written reply/comments on 28/06/2021 before S.B.

  
(Rozina Rehman)  
Member (J)

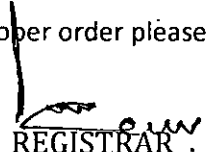
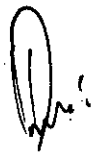

Appellant Deposited  
Security & Process Fee  
11/4/21

Form- A

# FORM OF ORDER SHEET

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

Case No.- 7240 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/07/2020	<p>The appeal of Mr. Ghani-ur-Rehman presented today by Mr. Muhammad Saeed Qureshi 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-	19.08.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/08/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present..</p> <p>Former requests for adjournment as he has not prepared the case.</p> <p>Adjourned to 23.10.2020 before S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member(E)</p>

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 7240/2020.

Ghani-ur-Rehman .....Appellant.

VS

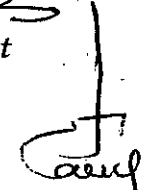
Inspector General of Police, KPK.and another..... Respondents.

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Memo of Service Appeal		1-3
2.	Application for Condonation of delay		5 4
3.	copy of the result card of B-I examination	"A"	5-6
4.	Copies of the Writ Petition and order/judgment dated 28.01.2014	"B"	7-24
5.	Copy of the contempt petition	"C"	25-26
6.	Copy of the order	"D"	27
7.	Copy of order dated 23/10/2018	"E"	28-29
8.	Copy of Departmental Appeal	"F"	30-34
9.	Copy of seniority list	"G"	35-43
10.	Wakalatnama		44

  
Appellant

Through:

  
Muhammad Saeed Khattak  
Advocate High Court, Peshawar.

Dated: /06/2020

1

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 7240/2020.

Ghani-ur-Rehman Belt No. 274 S/O Muhammad Ayub Khan P/O Behram Khail  
Tehsil Takht e Nasrati Disst. Karak ..... Appellant.

VS

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 6541

Dated 9/7/2020

- 1) Inspector General of Police, KPK.
- 2) The District Police Office Karak. .... Respondents.

Service Appeal U/S 4 of KPK Service Tribunal Act 1974 against the  
act/omission of respondents whereby the appellant was not allowed to  
participate in Lower Course Training at PTC Hangu which was scheduled  
from 05/10/2013 inspite of the direction made by the apex court as well as  
passing by him B-I examination in 2012.

Respectfully Sheweth,

1. That the appellant has been enrolled in the police force as constable on 25/10/2004.
2. That in order to join Lower School Course, it is pre-requisite for every constable to pass B-I examination provided that he may not be above the age of 33 years.
3. That the appellant was not allowed to participate in B-I examination in due course of time for the reason best known to the respondents and was allowed in the year 2012, which he passed and secured second position in the same and then too he was not allowed to participate in lower school training at PTC Hangu (copy of the result card of B-I examination is attached as annex-A).
4. That being aggrieved of the same the appellant filed a Writ Petition which was numbered as WP.No 3117-p /2013 which was allowed ride order / Judgment dated 28/01/2014 along with other connected writ petitions with directions to the respondents to include the names of the petitioners in the list of the candidates of their respective districts forth covering course , scheduled to be commenced from

**Filed to-day**

**Registrar**

9/7/2020

04/10/2013 is about to conclude just after a month. (Copies of the Writ Petition and order/judgment dated 28.01.2014 are attached as annexure B)

- 5. That appellant was, thereafter again ignored till 2018, when he filled contempt of court petition bearing No. COC. No 625-p/2017 in WP.No 3117-p/2017. (Copy of the contempt petition is attached as annex C).
- 6. That during the course of hearing the respondents produced an order bearing No 9015-23-IV dated 22/10/2018, whereby the appellant was allotted an extra seat for lower school training. According to it "His seniority will be reckoned with his colleagues who will be undergoing the lower school course with him. The timings of course shall not violate seniority of others." (Copy of the order is attached as annex D)
- 7. That the Hon'ble Peshawar High court vide order dated 23/10/2018 disposed of the COC. No 625-p/2017 in WP.No 3117-p/2017 in the following terms:

In view of the above, the COC has served its purpose and is disposed of. However, with the consent of the learned AAG, the words used in respect of "His seniority will be reckoned with his colleagues who will be undergoing the lower school course with him. The timings of course shall not violate seniority of others" are deleted, as the same is the job of the Service Tribunal, for which the petitioner for which the petitioner is at liberty to approach the said Forum. (Copy of order dated 23/10/2018 is attached as annex-E).

- 8. That after the same departmental appeal regarding the above mentioned subject matter of the appellant was filed before the respondent No.1 on 24/09/2019, which is/was duly processed. But till date no proper order has yet been passed on the same. (Copy of Departmental Appeal is attached as annex F).
- 9. That being highly aggrieved of the same, the appellant prefers the instant service appeal, inter alia, on the following amongst others,

**GROUNDS**

- A. That appellant has not been treated in accordance with law nor has equal protection of law been extended to him. The act/omission on the part of the respondents is the gross violation of article 4 and 25 of the constitution.
- B. That act of the respondents is in violation of article 25 of the constitution of the Islamic republic of Pakistan as well as the dictum laid down by the

Hon'ble supreme court of Pakistan in case reported as 2009 (SCMR 187 wherein it has been held as follows:

"Equal treatment of all similarly situated is the basic principle on which rests justice under the law. If even handed justice is not administered, it can have many adverse frustration in the social set-up. There can be no denial that social justice is an objective and enshrined in our constitution,"

- C. That the act of respondents of not allowing the appellant for lower school course in due time made him junior for promotion not only from his batch fellows but also more than 300 juniors became seniors to him for the purpose of promotion. (Copy of seniority list is attached as annex G).
- D. That the appellant suffered due to ill will, malafide or due to any other reason best known to the respondent. The appellant must not be suffered for the wrong committed by others and is entitled to be placed at seniority position for which he is entitled.
- E. That any other ground can also be taken during the course of arguments with permission of this Hon'ble tribunal.

It is therefore most humbly prayed that an acceptance of the instant service appeal the respondents concerned may be directed to place the name of the appellant at appropriate seniority position.

Any other relief which has not been asked for and seems fit in the circumstances of the case may also be granted to the appellant.

*Qhmis*  
Appellant

Through:

*saef*  
Muhammad Saeed Khattak  
Advocate High Court, Peshawar.  
*Chattak*

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.**

C.M No: -----/2020

IN

Service in Appeal No: ----/2020

Ghani-ur-Rehman VS IGP and another.


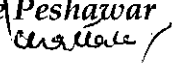
**APPLICATION OF CONDONATION OF DELAY, IF ANY.**

Respectfully Sheweth.

1. That the titled service appeal has been pending before this Hon'ble tribunal in which no date has yet been fixed for hearing.
2. That the applicant has good prima facie case and is sanguine of its success. In case of limitation if any, is not condoned, he will suffer irreparable loss.
3. That the apex courts have favored the cases to be decided on merits rather on technicalities including the limitation.
4. That the cause of applicant being continues in nature and in such like circumstances the question of limitation does not occur.
5. That any other argument can also be taken during the arguments with permission of this Hon'ble tribunal.

It is therefore most humbly prayed that on acceptance of the instant application the delay, if any, in filing of the titled service appeal may kindly be condoned.

  
Applicant/Appellant.

Through   
Muhammad Saeed Khattak  
Advocate Peshawar  


Annex-A  
5

Result of Annual B-1 Exam 2012, of District Kurak, Issued by the Commandant,  
Police Training College, Hangu.

Notification No. 604 IS dated, Hangu, the 22-02-2012.

S.No	Name	Belt No.	D.O.B	Year of Passing A-1 Exam	Chances Availed in B-1 Exam	Marks ob out of 100	Result
1	Fiaz Ahmad	505	25.07.1981	2007	3rd	111.5	Passed
2	Khalid Rehman	1167EF/350	15.04.1979	2009	1st	104.5	Passed
3	Wasif Ullah	838/1288	27.02.1981	2008	2nd	103.5	Passed
4	Yasir Khan	855/816/1295	01.05.1985	2009	1st	101	Passed
5	Saif Ur Rehman	709	02.03.1981	2007	2nd	100	Passed
6	Muhammad Adil	298	04.04.1979	2010	1st	96	Passed
7	Farman Ullah	519/68/E.F	20.02.1982	2007	1st	95.5	Passed
8	Ghani Ur Rehman	715/274	15.01.1983	2009	2nd	95.5	Passed
9	Zia Ur Rehman	634	04.02.1984	2009	1st	95	Passed
10	Muhammad Tariq	631	16.04.1980	2008	1st	95	Passed
11	Amjad Ali	506	13.08.1981	2008	3rd	94.5	Passed
12	Hazrat Ullah	673	02.03.1985	2008	2nd	93	Passed
13	Sadar Nawaz	69/56E	26.02.1984	2008	2nd	93	Passed
14	Muhammad Ali	189	Nil	Nil	Nil	90.5	Passed
15	Muhammad Nawaz	832	01.01.1984	2008	2nd	86	Passed
16	Rabi Ullah	715	20.01.1981	2007	2nd	86	Passed
17	Ghansat Ullah	192	08.04.1985	2009	2nd	85.5	Passed
18	Amjid Ullah	183/11	10.02.1983	2009	1st	82.5	Passed
19	Zafar Iqbal	418	04.11.1982	2007	2nd	80.5	Passed
20	Faiz Ullah	1177E	01.04.1984	2010	1st	78.5	Passed
21	Abdul Jabar	751	06.06.1979	2010	1st	78	Passed
22	Amjad Kamal	513	02.03.1984	2007	2nd	75	Passed
23	Nasreen Begum	173	04.08.1981	2010	1st	73.5	Failed
24	Muhammad Yaqoob	824	05.10.1985	2009	1st	72	Failed
25	Inayat Ullah	507	15.03.1984	2008	3rd	71	Failed
26	Abdus Saboor	224	10.03.1983	2008	2nd	66	Failed
27	Habib Ullah	1036/395	01.03.1980	2008	2nd	64	Failed
28	Hafiz ur Rehman	342	29.10.1981	2008	2nd	62	Failed

ATTESTED




(6)

of Annual B-1 Exam 2012, of District Karak, Issued by the Commandant,  
Police Training College, Hangu.

Notification No.		/S dated, Hangu, the			2012.		
S.No	Name	Roll No.	D.O.B	Year of Passing A-1 Exam	Chances Availed in B-1 Exam	Marks obtd: out of 150	Remarks

Prepared by Incharge Secreary,

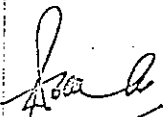
  
Commandant,  
Police Training College Hangu.

Checked and found correct,

Controller of examinations.

No. 605-06 /S dated Hangu, the 22-02-2012.  
Copy to:

1. The DIGP, Kohat Region, Kohat.
2. The District Police Officer Karak.

  
Commandant,  
Police Training College Hangu.

**REGISTERED**  


IN THE PESHAWAR HIGH COURT PESHAWAR



TITLE:

wp 3117-P

Constable Ghani-Ur Rehman Belt No.274 S/o Mohammad  
Ayub Khan R/o Behram Khail Tehsil Takht Nasrati District  
Karak .....Petitioner.

Versus

The Provincial Police Officer, Govt: of KPK, Peshawar  
and others.....Respondents.

Will you kindly treat the accompanying Writ Petition as  
urgent and in accordance with the Provisions of Rules; 9  
Chapter 3-A, Rules order of the High Court, Lahore.  
Volume V.

2. The grounds of urgency are:

That the petitioner is entitled to admit to the ;Inter School  
Course ; commenced from 05-10-2013 but have been  
deprived without Lawful justification .The training has  
been scheduled from 05-10-2013 and if the petitioners  
are left over from joining their Course , they will have to  
face irreparable lose therefore, this writ petition with the  
prayer for interim Relief is being filed on much urgent  
basis . The case being highly urgent need urgent fixation.  
Similarly nature writ petition Titled "Muhammad  
Asif Aziz Vs IGP (PPO), Peshawar, Noor Manan Vs  
IGP (PPO), Faheem Khan Vs Vs IGP (PPO) has fixed  
for 04-11-2013.

FILED TODAY

Deputy Registrar

02 DEC 2013

Through

Petitioner

Ashraf Ali Khattak  
Advocate, Peshawar.

Dated: / 11/ 2013

ATTESTED

EXAMINER  
Peshawar High Court

IN THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION No. 317-P/2013

Constable Ghani-Ur Rehman Belt No.274 S/o Mohammad Ayub  
Khan R/o Behram Khail Tehsil Takht Nasrati District Karak  
.....Petitioner

Versus

1. The Provincial Police Officer, Govt: of KPK, Peshawar.
2. The Regional Police Officer, Kohat Region Kohat.
3. The District Police Officer, District Karak .
4. The Commandant Police Training College Hangu.  
.....Respondents.



WRIT PETITION UNDER ARTICLE, 199 OF THE  
CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN,  
1973.

Respectfully Sheweth,

Facts giving rise to the present writ petition are as under:-

1. That petitioner has been enrolled in the Police Force as constable on 25-10-2004
2. That it is pertinent to mention here that passing of B-1 examination has been declared as pre-requisite for allowing police constable for Lower School Course provided that he is not above the age of 33 years.
3. That petitioner was not allowed to participate in B-1 examination in due course of time for reason best known to the respondent and was allowed in the year 2012, which he passed and secured 2<sup>nd</sup> position in the same (Annexure-A), and was not allowed to participate in Lower School Course Training at PTC, Hangu.
4. That it is pertinent to mention here that the respondent has allowed number of constable for Lower School Course who has passed the required B-1 examination in 2012 and were also overage (Annexure-B).

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Deputy Registrar  
2 DEC 2013

ATTESTED

EXAMINER  
Peshawar High Court

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- 5. That it is also pertinent to bring into the kind notice of this Honourable Court that this Honourable Court has also allowed the same nature writ petition No. 3170-P/2012 (Annexure-C).
- 6. That recently the vide Notification No.24855-82/EI, dated Peshawar 01-10-2013 some 180 extra seats have been allocated to Lower School Course for the forthcoming term commencing from 05-10-2013 for those lower Sub ordinates of the KPK Police, who were overage (Annexure-D) and even failed in B-1 examination.
- 7. That petitioner was also entitled for Lower School Course Training on the score of Policy letter No.7250-62/E-1, dated Peshawar the 23-04-2004 (Annexure-E).
- 8. That it is also pertinent to bring into the kind notice of this Honourable Court that this Honourable Court has also allowed the same nature of writ petitions bearing No.2614,2615,2616 of 2013 and No. 2542-P, 2765-P and No.2885-P of 2013. The case of the petitioner is similar and identical to all those petitioner, which has been allowed by this Honourable Court (Annexure-F)
- 9. That petitioner being aggrieved of the acts of the respondent for not allowing him to be enlisted and admitted for the forth coming scheduled Lower School Course submitted departmental representation but no head has been paid till the date.
- 10. That petitioner, being aggrieved of the acts and actions of Respondents and having no other adequate and efficacious remedy, files this constitutional petition inter-alia on the following grounds:-

Grounds:

- A. That Respondents have not treated petitioner in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973. Petitioner is entitled to be enlisted and admitted for Lower School Course on the strength of Policy Letter No. 7250-62/E-1, dated 23-04-2004, but has been denied therefore, the act of the respondents is unlawful, unjust, unfair and hence not sustainable in the eye of law.
- B. That petitioner has highly been discriminated as similarly placed lower sub ordinates has been allowed and admitted for Lower School Course, whereas petitioner who position lie on the same footing has been denied. Petitioner is

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Deputy Registrar  
02 DEC 2013

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EXAMINER  
Peshawar High Court

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also entitle on the strength of the judgment of this Honourable Court.

- C. That petitioner is entitled for admission to the lower school course on the strength of the Judgment/order of this Honourable Court as petitioner case is similar and identical to those whose writ petitioner has been allowed.
- D. That if the petitioner is not allowed to participate in the Lower School Course already commenced with effect from 05-10-2013, petitioner would lose all expectation of his promotion to the higher ranks and would remain a constable till his retirement which is against the principle of natural justice and equity.
- E. That petitioner would like to seek the permission of this Honourble Court to advance some more ground at the time of hearing.

For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this writ petition, this Hon'ble Court may graciously be pleased to declare the act of the respondents as illegal, unlawful and without lawful authority for not allowing and admitting the petitioner for Lower School Course/Training already schedule with effect from 05-10-2013 and direct them to take immediate action and allow the petitioner for the same.

Any other relief as deemed appropriate in the circumstances of case not specifically asked for may also be granted to petitioner.

Through Petitioner

Ashraf Ali Khattak  
and  
Nawaz Khan Khattak  
Advocates, Peshawar.

Dated: \_\_\_\_\_ / 11/ 2013

Interim Relief:-

By way of interim relief this Honourble Court may graciously be pleased to direct the respondents to allow the petitioner to join the ongoing Lower School Course already commenced with effect from 05-10-2013 till the final disposal of the instant writ petition.

Petitioner  
Through

Ashraf Ali Khattak

Dated: .. / 11 / 2013

FILED TODAY  
Deputy Registrar  
02 DEC 2013

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EXAMINER  
Peshawar High Court

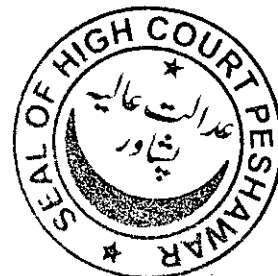
Judgment Sheet

IN THE PESHAWAR HIGH COURT,  
PESHAWAR.

JUDICIAL DEPARTMENT

WP No. 3117-P of 2013

JUDGMENT



Date of hearing.....28/01/2014.....

Petitioner...(Ghani-ur-Rehman) by Mr. Ashraf Ali Khattak,  
Advocate .....

Respondent...(The Provincial Police Officer, KPK Peshawar  
and 3 others) by Mian Arshad Jan, AAG .....

\*\*\*

**MRS. IRSHAD QAISER, J:-** For reasons recorded in case titled "**Hazarat Ali Vs. The Provincial Police Officer, KPK, Peshawar etc**" (WP No.2698-P of 2013), this writ petition is allowed and the respondents are directed to include the name of the petitioner in the list of the candidates in his respective District for the forthcoming course, scheduled to be commenced with effect from 01.04.2014, as the current course, which commenced from 04.10.2013 is about to conclude just after a month.

**Announced:**  
Dt.28.01.2014.

JUDGE

JUDGE

\*/M.S.A/\*

ATTESTED

EXAMINER  
Peshawar High Court

Judgment Sheet

IN THE PESHAWAR HIGH COURT,  
PESHAWAR.

JUDICIAL DEPARTMENT

WP No. 2698-P of 2013

JUDGMENT

Date of hearing.....28/01/2014.....

Petitioner...(Hazrat Ali) by Mr. Ashraf Ali Khattak,  
Advocate .....

Respondent...(The Provincial Police Officer, KPK Peshawar  
and 3 others) by Mian Arshad Jan, AAG .....

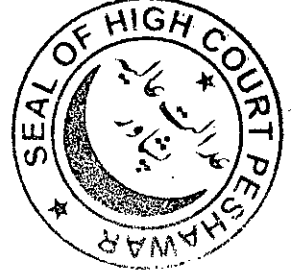
\*\*\*

**MRS. IRSHAD QAISER, J:-** Through  
this single judgment, this Court shall  
dispose of thirteen writ petitions, as  
common questions of law and almost  
similar facts are involved therein. The  
particulars of writ petitions are as follows:-

- i. Hazarat Ali Vs. The Provincial  
Police Officer, KPK, Peshawar etc  
(WP No.2698-P of 2013);
- ii. Muhammad Tariq Vs. The  
Provincial Police Officer, KPK,  
Peshawar etc  
(WP No.3281-P of 2013);
- iii. Naqeeb Ullah etc Vs. The  
Provincial Police Officer, KPK,

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**EXAMINER**  
Peshawar High Court



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Peshawar etc  
(WP No.3282-P of 2013);

- iv. Ibrar Hussain Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3284-P of 2013);
- v. Hazarat Samad Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3289-P of 2013);
- vi. Sajid Iqbal etc Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3104-P of 2013);
- vii. Ghani-ur-Rehman Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3117-P of 2013);
- viii. Yaqoob Khan Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.2892-P of 2013);
- ix. Riaz Khan Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3226-P of 2013);
- x. Rasheed Ahmad Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3173-P of 2013);
- xi. Muhammad Jasim Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.2919-P of 2013);
- xii. Waheed Gul Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3228-P of 2013);
- xiii. Syed Walayat Shah etc Vs. The Provincial Police Officer, KPK, Peshawar etc (WP No.3250-P of 2013).

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**ATTESTED**

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2. The brief and essential facts leading to the aforementioned writ petitions are that the petitioners are employees of Police Department serving in Khyber Pakhtunkhawa; that as per Standing Order No.1 of 2004, a police constable having three years service/experience shall be eligible to participate in 'A-1' examination; that likewise a constable who completes two years service as a constable on list 'A-1' becomes eligible for participation in 'B-1' examination and after qualifying the same, he becomes eligible for his selection to the Lower School Course; that as per Police Rules 13.7, a constable on list 'B-1' could only be selected for Lower School Course at PTC, Hangu, if his age is not beyond the prescribed age limit of 33 years; that all the petitioners have qualified their 'B-1' examination but they were not selected for Lower School Course without any valid and just cause; that not only this but also in utter disregard of the rules and the policy, the respondents have

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**ATTESTED**

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selected junior police constables to the petitioners for the subject course and they have not extended the benefit of Standing Order No.7 of 2008 to the petitioners and were not allowed to participate in the Course commenced w.e.f 04.10.2013. The petitioners prayed that on acceptance of their writ petitions, they be declared to be eligible and qualified for selection to the Lower School Course as per Standing Order No.7 of 2008 and direct the respondents to allow and select the petitioners for foregoing Lower School Course already commenced w.e.f 04.10.2013 at PTC, Hangu.

3. The respondents contested the writ petitions and also filed their Para-wise comments, wherein, they denied the allegations of the petitioners and submitted that they being overage were not entitled to be admitted for the Lower School Course at PTC, Hangu and no discrimination has been made with them.

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4. Valuable arguments of learned counsel for the parties heard and available record thoroughly considered.

5. Perusal of record would reveal that earlier this Court had considered similar question of law and facts, as involved in the present petitions, in WP No.2614-P of 2013 decided on 12.11.2013 and several others similar writ petitions and the petitioners in the said petitions were allowed to join the requisite '**Lower School Course**'. The submissions of the present petitioners were also taken into consideration in the light of the record placed before the Court.

4. In order to arrive at a just conclusion, this Court deems it appropriate to have reproduced here the relevant extract of the judgment dated 12.11.2013 in WP No.2614-P/2013. The said extract reads that:-

*"It would be advantageous to first mention here the relevant Rule i.e Rule 13.7 of Police Rules, 1934, under which List-B is prepared and maintained by each Superintendent of Police:-*

*"Selection shall be made from this list as*

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Peshawar High Court

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vacancies occur for admission to the courses concerned at the Police Training School, provided that no constable shall be considered eligible for any such course until the entry of his name in list 'B', has been approved by the Deputy Inspector-General of the Range. Ordinarily seniority in age shall be given prior consideration in making such selections, irrespective of the date of admission to the list, and care must be taken that a constable borne on the list is not allowed to become over age for admission to the school before being selected. The restrictions on admission to the lower school course and Instructors' courses at the Police Training School limit the conditions for admission to list B. No constable shall be admitted to that list whose age is such that he cannot in the normal course be sent to the Training School before he attains the age of 33 years. No constable, who has failed to qualify at the Training School, shall be re-admitting to the list unless the Superintendent and the Principal of the School are in agreement that he

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is deserving of another chance of qualifying in the Courses, in the event of disagreement as to such a case the Deputy Inspector-General shall decide."

The rationale behind above rule is that a constable brought on list-B shall be given priority irrespective of the date of admission to the list, whose age is going to expire if not sent for Training in case vacancies occur for admission to the course. Grievance of petitioners except the petitioner in Writ Petition No.2542 of 2013 is that they have already qualified examination and brought on list-B for Lower School Examination but when vacancies became available, they were ignored and those constables were selected who were younger than petitioners in age and if petitioners are not sent for the course in question then they would become overage till availability of further vacancies and selection - of candidates for the next course; thus their promotion chances to the post of Head Constables would come to an end. The petitioner in Writ Petition No.2542/2013, however, seeks this remedy on the basis of discrimination. According to him, though his name was not brought on list-B but the respondents selected one Lal Rehman, Constable for lower school course, who name was also not available on list-B despite the fact that he had 2/3 years more to become overage whereas petitioner has only few months to become overage, if not sent for Training.

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The prayer of petitioners is genuine in the sense that this Court has already given relief to those Police Constables, who had passed their B-1 examinations and were entitled under Standing Order No.7 of 2008 to be selected for the Lower School Course but not selected by respondents despite their eligibility and crossing of age limit.

The petitioners, in view of Rule 13.7 of Police Rules, 1934, were entitled to be given preference in the matter of selection for undergoing training of the requisite course because of their ages, but juniors to them were selected; hence not only violation of rules is apparent in their cases but discriminatory treatment is also evident on the other hand. The cases of petitioners are similar to the cases of those petitioners, who have been given relief by this Court in the above mentioned writ petitions and the propriety thus demands giving similar relief to petitioners.

Accordingly, these writ petitions are accepted with directions to respondents to immediately arrange the sending of petitioners to Hangu Training College for the requisite Course without fail and without loss of time. No order as to costs."



5. While considering the case of the present petitioners with those, who were petitioners in the aforementioned writ petitions, it revealed that most of the

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petitioners were recruited / appointed in the police department as Constables in the year, 2006-2007 and at that time a considerable number of constables were recruited beyond the prescribed age limit of 25 years, while extending maximum relaxation in the upper age limit up to 5 years. Subsequently, in order to safeguard the rights of the petitioners and many others regarding their participation in the courses and further promotion, who were appointed beyond the prescribed age limit, Standing Order No.7 of 2008 was promulgated. In order to tackle with the situation / anomaly, it was provided in the said Standing Order of 2008 that:-

*"The benefit of relaxation of age in the upper age limits granted by the Provincial Government to those constables who have been recruited during the year, 2006-07; is being extended to the concerned individuals in other related examinations/course so that they are not deprived of their future career prospects, which if not done, will lead to frustration amongst the concerned officials. It is therefore, directed that all those constables who have been recruited in between the age of 25 to 30 years shall be extended the*

**ATTESTED****EXAMINER**  
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benefit of relaxation of age for their selection to the Lower School Course to the extent of:

**Example:—**

A constable who has availed age relaxation of one year and recruited in the age of 26 years shall be considered eligible up to the age of 34 years for lower school course whereas a constable recruited in the age of 30 years, shall be considered eligible to Lower School Course up to the age of 38 years for selection to the lower school course.

All such incumbents shall have to undergo all the prescribed tests/examination as per rules on the subject with their colleagues.

The provisions of this standing order shall be applicable only to recruits appointed in the year 2006 and 2007 and to the next of kin of Shaheeds who are given condonation by PPO."

It appears from the record that the petitioners have not only discriminated while considering them for the lower school course with those who were mentioned in list 'B-1' but also juniors to them were selected and the petitioners were ignored without any valid legal reason. While analyzing Rule 13.7 of Police Rules, 1934 with the Standing Order No.7 of 2008 and the earlier judgment of this Court dated 12.11.2013, it has been

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abundantly clear that the petitioners were entitled to be admitted to the subject Course at PTC, Hangu and they were not treated by the respondents in accordance with law, rules and policy on the subject. The benefit extended vide Standing Order No.7 of 2008 could not be taken out through Standing Order No.3/2011, wherein, maximum age limit for qualifying 'B-1' examination has been fixed as thirty three years. Thus, in view of the aforementioned discussion, the case of the petitioners in WP No.2698-P/2013, WP No.3281-P/2013, WP No.3282-P/2013, WP No.3284-P/2013, WP No.3104-P/2013, WP No.3226-P/2013, WP No.3173-P/2013, WP No.3228-P/2013 and WP No.3250-P/2013 falls within the purview of Standing Order No.7 of 2008 read with Rule 13.7 of Police Rules, 1934, as they were appointed in the year, 2006-2007. Whereas the case of the petitioners, in WP No.2919-P/2013, WP No.2892-P/2013, WP No.3117-P/2013 and WP No.3289-P/2013 is slightly

J.S.P.

**ATTESTED**
  
**EXAMINER**  
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distinguished from that of petitioners in the  
aforementioned former writ petitions, as they  
were appointed prior to the said petitioners.  
However, all the petitioners are entitled to be  
treated in accordance with law, when they  
have qualified their requisite examination  
before inducting for 'Lower School Course' at  
Hangu. No discrimination can be made with  
them, in particular, when juniors to the  
petitioners have been sent to participate in  
the course. The respondents have failed to  
point out any valid justification for not  
allowing them for the said course. In these  
circumstances, the respondents were  
required to have included the names of the  
petitioners for the subject course, as the law  
provides equal opportunity to the petitioners  
to compete with their other '*similarly placed*'  
colleagues.

J. S. 10/10

6. Accordingly, for the reasons stated  
hereinabove, all the writ petitions are allowed  
and the respondents are directed to include  
the names of the petitioners in the list of the

**ATTESTED****EXAMINER**  
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candidates of their respective Districts, for the forthcoming course, scheduled to be commenced with effect from 01.04.2014, as the current course, which commenced from 04.10.2013 is about to conclude just after a month.

**Announced:**  
Dt.28.01.2014.

*M. Iqbal Qureshi*  
*M. Mumtaz Hussian*

*(Signature)*  
**JUDGE**

*(Signature)*  
**JUDGE**

/\*M.S.A\*/

*Office*  
*3-2-2014*

*(Signature)*  
**CERTIFIED TO BE TRUE COPY**  
**EXAMINER**  
Peshawar High Court, Peshawar  
Authorised Under Article 8.7 of  
The Qanun-e-Shahadat Order 1984

10 JUN 2020

No. 37466  
Date of Presentation of Application. 10/6/2020  
No of Pages 18-72  
Copying fee  
Total 72  
Date of Preparation of Copy 10/6/2020  
Date of Delivery of Copy 10/6/2020  
Received By 29/6/20

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR  
COC No. \_\_\_\_\_-P/2017

In

W.P No. 3117-P /2013

Ghani-Ur-Rehman S/o Mohammad Ayub Khan R/o Behram Khail  
Tehsil Takht-e-Nasrati, District Karak.....Petitioner

Versus

Salahuddin Mehsud, IGP, Kyber Pakhtunkhwa, Peshawar  
.....Respondent/ Contemnor

APPLICATION UNDER SECTION 3, 4 & 5 OF THE CONTEMPT OF  
COURT ORDINANCE, 2003 READ WITH ARTICLE-204 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 AND  
OTHER ENABLING PROVISION OF LAW FOR INITIATING  
CONTEMPT OF COURT PROCEEDING AGAINST THE  
RESPONDENT/ CONTEMNOR AS WELL AS FOR THE  
IMPLEMENTATION OF THE ORDER OF THIS HONORABLE  
COURT DATED 28/01/2014

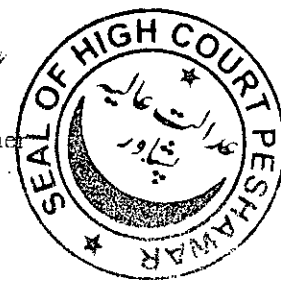
Respectfully Sheweth;

Applicant humbly submits as under;

1. That petitioner filed above noted case before this Hon'ble Court which was allowed by this Hon'ble Court vide judgment dated 28/01/2014 . ( Copy of the judgment is attached as Annexure "A")
2. That this Hon'ble Court allowed above noted W.P and directed respondents to include the names of the petitioners in the list of the candidate of their respective District, for the forthcoming course, scheduled to be commenced with effect from 01/04/2014, as the current course, which commenced from 04/01/2013 is about to conclude just after a month.
3. That government challenged the same judgment before the August Apex Court of Pakistan who vide order dated 23/09/2014 dispose of the petitions with observation that the persons, who after age relaxation are qualified to appear in AI

**ATTESTED**

**EXAMINER**  
Peshawar High Court



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Annex (C)

and B1 examination shall be eligible to undergo the training and for that purpose a Committee shall be constituted by the competent authority who shall determine their merit alongwith other candidates strictly in terms of the standing order/ P.P.B as mentioned above. ( Copy attached as Annexure "B")

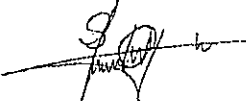
- 4. That commandant Police Training College, Hangu vide notification No. 604/ S dated, Hangu, the 22/02/2012 declare the Result of Annual B-1 Exam 2012, of District Karak wherein the name of petitioner is available at serial No. 8 of the Result card and he has shown passed in the said examination. That petitioner has also been discriminated as junior to him has also been selected.( Copy of Result Card attached as Annexure " C")
- 5. That petitioner time and again approached his high ups for the implementation of the court order in its true spirits but till date respondent are badly fails to comply the judgment of this Hon'ble Court and as a last resort approaches this Hon'ble Court for redressal of his grievances.

It is, therefore, most humbly prayed that this Honorable Court may graciously be please to direct the contemnors to comply Court Orders in its true letter and spirit.

It is, further prayed that this Honorable Court may graciously be pleased to initiate proceedings in contempt of court against the contemnor in accordance with law and impose exemplary punishment for defiance of the order of this Honorable Court so that they or other may not think of defiance of the orders of Superior Judiciary.

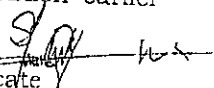
Any other relief in the circumstances of the case as deemed appropriate by this Honorable Court may also be granted.

Petitioner

Through 

(SHAHID QAYUM KHATTAK)  
Advocate, Peshawar

It is certified that undersigned has not filed any such petition earlier before this Hon'ble Court on behalf of petitioner

  
Advocate

**ATTESTED**  
  
**EXAMINER**  
Peshawar High Court



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

*Annex D*

(27)

No: 9015-22 /E-IV

No: 9015-22 /E-IV

dated

Peshawar the 22 / 10 / 2018

ORDER

In compliance with the order dated 28.01.2014 passed by Peshawar High Court Peshawar in Writ Petition No. 3117-P/2013 and subsequent COC 625-P/2017, one extra seat for Lower School Course is hereby allotted to the petitioner namely Ghani-ur-Rehman No. 274 of District Karak provisionally subject to the outcome of CPLA. His seniority will be reckoned with his colleagues who will be undergoing the Lower School Course with him. The timings of course shall not violate seniority of others.

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

Endst: No. and dated even

Copy forwarded to the:-

1. Registrar, Peshawar High Court Peshawar.
2. Deputy Inspector General of Police, Kohat Region, Kohat.
3. Commandant Police Training College Hangu with the direction to make entry in his service record.
4. PSO to worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
5. Asstt: Inspector General of Police, Legal, Khyber Pakhtunkhwa, Peshawar.
6. District Police Officer Karak with the direction to make entry in his service record.
7. Supdt: of Police, Courts and Litigation, CPO Peshawar.

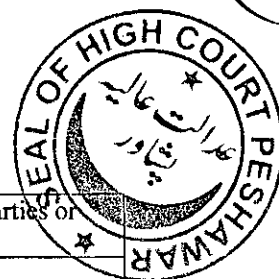
(ZAIB ULLAH KHAN) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

ATTESTED  
*[Signature]*

Annex - E (28)

**PESHAWAR HIGH COURT, PESHAWAR.**

**ORDER SHEET**



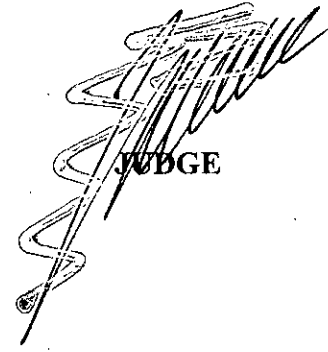
Date of Order or Proceedings.	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary.
1 23.10.2018	2 <b><u>COC No-625-P/2017 in W.P No. 3117-P/2013.</u></b>  <b><u>Present:</u></b> Mr. Shahid Qayyum Khattak, Advocate, for petitioner.  Mr. Waqar Ahmad Khan, AAG, along with Javed Chughtai, S.P (legal) for respondent.  * * * *  <b><u>WAQAR AHMAD SETH, C.J.</u></b> Through the instant Contempt of Court petition, the petitioner seeks initiating of contempt proceedings against the respondent for non-compliance of order of this Court dated 28.1.2014 passed in the writ petition.  2. Today at the very outset of the proceedings, the learned AAG produced order bearing Endorsement No.9015-22/E-IV dated 22.10.2018, whereby the petitioner has been allotted one extra seat in the Lower School Course.  3. In view of the above, the COC has served its purpose and is disposed of. However, with the consent of the learned AAG, the words used in respect of "His seniority will be reckoned with his colleagues who will be undergoing the Lower School

**ATTESTED**

**EXAMINER**  
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Course with him. The timings of course shall not violate seniority of others. are deleted, as the same is the job of the Service Tribunal, for which the petitioner is at liberty to approach the said forum.

  
CHIEF JUSTICE

  
JUDGE



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EXAMINE  
Peshawar High Court  
Authorised Under  
The Qanun-e-Shahadat Ordinance

10 JUN 2020

No. 37467  
Date of Presentation of Application 10/6/2020  
No of Pages 5-12  
Copying fee \_\_\_\_\_  
Total 20  
Date of Preparation of Copy 10/6/2020  
Date of Delivery of Copy 10/6/2020  
Received By [Signature]



30

Annex (E)

جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ

جناب عالی!

معروض ہوں کہ میرا لوئر کورس سلیکشن ٹرم 2012ء کو ہونا تھا، مگر ناگزیر وجوہات کے بناء پر بروقت سلیکشن نہ ہوئی۔

جناب نے مہربانی کر کے بحوالہ آرڈر نمبر 9065.22/EIN مورخہ: 22/10/2018 کو لوئر کورس کیلئے سلیکٹ کیا۔

میری سنیاری سال 2012ء کے ٹرم کے ساتھ ہائی کورٹ آرڈر میں کیا تھا۔ مگر تا حال تقییل نہ ہوئی۔ نقل آرڈر ہائی کورٹ لف ہے۔

لہذا استدعا ہے کہ سائل کو اپنے بیچ میٹ سال 2012ء کے ساتھ سنیاریٹی دی جاوے۔

سائل تا عمر دعا گو رہیگا۔

SRC  
Fax n/Action.

*[Handwritten signature]*

SP/Mr: KK

تحریر: 24/09/2019

R/Sir

forwarded for favour  
A consideration please.

نوایش ہوگی۔  
SPPO - Mr. KK.

العارض

غنی الرحمن 274/LHC متعینہ انوسٹگیشن شاف تھانہ YKS ضلع کرک

شناختی کارڈ نمبر: 14203-2045914-1 موبائل نمبر: 0345-1911100

Sir  
forwarded

*[Handwritten signature]*  
19-10-19

ATTESTED

*[Handwritten signature]*



7937  
23-10-19

31

OFFICE OF THE SUPERINTENDENT  
OF POLICE, INVESTIGATION  
WING KARAK

No. 2957 /Inv:

Dated 22-10 /2019.

To:-  
The Regional Police Officer,  
Kohat Region Kohat.

Subject:- APPLICATION

Memo:-

Enclosed kindly find herewith an application preferred by Ghan:-ur -  
Rahman LHC/274 of this wing, requesting for seniority please.

(Application enclosed)

*stec*

Superintendent of Police,  
Investigation Wing, Karak

*Be*  
*23/10*

*No 9643-44/EC*  
*dt 24/10/2019*

*SP Investigation, Karak ✓*

Seniority upto the level of HC  
falls under the domain of DPO,  
concerned, therefore, the same  
be disposed of with coordination  
of DPO Karak.

ATTESTED  
*etc.*  
*etc.*

*DPO Karak*  
*For information.*

DIG POLICE  
KOHAT

32

From: The District Police Officer, Karak.  
To: The Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

No. 15057/EC dated Karak the 30/12/2019.

Subject: APPLICATION OF GHANI ur REHMAN LHC

It is submitted that a self-explanatory application preferred by Ghani-ur-Rehman LHC No. 274 of Investigation Wing Karak regarding his seniority. Ghani-ur-Rehman LHC No. 274 was selected for Lower School Course vide your gracious office letter No. 9015-22/E-IV dated 22.10.2018, in compliance with the order dated 28.01.2014 passed by Peshawar High Court, Peshawar in Writ Petition No. 3117-P/2013 and subsequent COC No. 625-P/2017, by allotting one extra seat for District Karak provisionally subject to the outcome of CPLA. (Annexure-A).

In COC No. 625-P/2017 in Writ Petition No. 3117-P/2013 Peshawar High Court, Peshawar, vide Order Sheet dated 23.10.2018, it is mentioned in Para No. 3 that (as quoted below);

*3. In view of the above, the COC has served its purpose and is disposed of. However, with the consent of the Learned AAG, the words used in respect of "His seniority will be reckoned with his colleagues who will be undergoing the Lower School Course with him. The timing of course shall not violate seniority of others" are deleted, as the same is the job of the Service Tribunal, for which the Petitioner is at liberty to approach the said forum. (Annexure-B).*

Therefore, it is submitted that in the light of the above facts, please bestow this office with guidance for further necessary action.

Encls: Annexure-A  
Annexure-B  
Memo of application etc.  
(06 Pages)  
Total 09 Pages

Submitted Please.

  
DISTRICT POLICE OFFICER,  
KARAK

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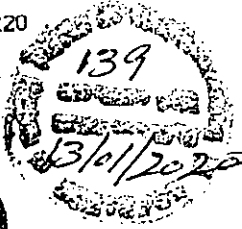


2020/01/10 19:20

(Fax)

P.001/001

33



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar

No. 205 /Legal dated Peshawar, the 10 / 01 / 2020.

To: - The District Police Officer,  
Karak.

Subject:- APPLICATION OF GHANI UR REHMAN LHC.

Memo:-

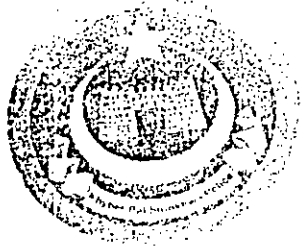
Please refer to your office letter No. 15057/EC dated 30.12.2019, on the subject cited above.

As per Police Rules, the Seniority is based upon merit lists of Lower School course with his colleague with whom he had undergone training.

AIG/Legal  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.  
10 01 2020

ATTESTED

DISTRICT POLICE OFFICER,  
KARAK



OFFICE OF THE SUPERINTENDENT  
OF POLICE, INVESTIGATION  
WING KARAK

No. 3046 /SFC.  
Dated 30-10 /2019.

(34)

To:- The District Police Officer Karak.

Subject:- APPLICATION

Memo:

Enclosed please find herewith worthy RPO Kohat remarks passed on the letter of the undersigned is sent herewith for further necessary action please.

di Superintendent of Police,  
Investigation Wing, Karak

ATTESTED

## POLICE DEPARTMENT

## SENIORITY LIST OF C-I CONSTABLES ACCORDING TO LOWER SCHOOL HISTORY SHEETS PTC HANGU.

Annex-9

S.No.	Name & Numbers	Seniority Position according to Term Ending.	Order of Merit.	m E	Remarks
1.	Raqib Ullah Khan No.419	20.03.2012	51	10 <sup>th</sup>	Promoted as HC
2.	Muhammad Imran No.522/E.F/	20.03.2012	9		Promoted as HC
3.	Muhammad Younus No.1472/951 (FRP)	20.03.2012	24	FA	Promoted as HC
4.	Fazal Mehmood No.1370 (FRP)	20.03.2012	36	BA	Promoted as HC
5.	Head Constable Abdul Hameed No.833	20.03.2012	47	BA	Promoted as HC
6.	Amir Hussain No.177	20.03.2012	91	BA	Promoted as HC
7.	Waqar Ahmed No.226	20.03.2012	92	BA	Promoted as HC
8.	Shahid ur Rehman No.427	20.03.2012	189		Promoted as HC
9.	Yasir Arafat No.518	20.03.2012	213		Promoted as HC
10.	Sadar Nawaz No.56/E.F	20.09.2012	52	FA	Promoted as HC
11.	Khalid ur Rehman No.1167/E.F	20.09.2012	65		Promoted as HC
12.	Saif ur Rehman No.709	20.09.2012	94	M.Sc	Promoted as HC
13.	Fayyaz Ahmed No.505	20.09.2012	124	10 <sup>th</sup>	Promoted as HC
14.	Muhammad Ali No.3792/E.F/	20.09.2012	140	BA	Promoted as HC
15.	Amjad Kamal No.513/	20.09.2012	242	10 <sup>th</sup>	Promoted as HC
16.	Abdul Jabbar No.751/	20.09.2012	256	10 <sup>th</sup>	Promoted as HC
17.	Hazrat Ullah No.673/	20.03.2013	43	BA	Promoted as HC
18.	Wasif Ullah No.838/LHC	20.03.2013	83	BA	Promoted as HC
19.	Farman Ullah No.68/E.F/LHC	20.03.2013	382	10 <sup>th</sup>	Promoted as HC
20.	Amjad Ali No.506/LHC	20.03.2013	392	10 <sup>th</sup>	Promoted as HC
21.	Abid Rehman No.54/LHC	20.09.2013	64	MA	Promoted as HC
22.	Najeeb Ullah No.46/E.F /LHC	20.09.2013	75	FA	Promoted as HC
23.	Muhammad Arif No. 4717 /E.F/LHC	20.09.2013	107	B.A	Promoted as HC
24.	Umer Badshah No.690/LHC	20.09.2013	151	FA	Promoted as HC
25.	Muhammad Jabar No.85/E.F /LHC	20.09.2013	162	BA	Promoted as HC
26.	Lal Rehman No. 729	20.12.2013	14	10 <sup>th</sup>	Un-qualified for promotion due to B-I failure vide CPO letter No. 2236-60/E-IV, dated 21.02.2017
27.	Majid Khan No. 558	20.03.2014	13	B.A	
28.	Mohib Ullah No.514	20.03.2014	44	B.A	
29.	L/Const: Gohar Kalsoom No. 557	20.03.2014	73	B.A	
30.	Muhammad Zafran No. 72/E.F	20.03.2014	87	10 <sup>th</sup>	Elite Force
31.	Naseeb Ullah No. 1136	20.03.2014	138	M.A	CTD
32.	Hidayat Ullah No. 379	20.03.2014	189	F.A	
33.	Umer Zada No.611	31.07.2014	18	BBA	Inv:
34.	Arif Ullah No. 188	31.07.2014	22	FA	Inv:
35.	Sajjad Iqbal No.515	31.07.2014	26	10 <sup>th</sup>	

Annex G

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C/O

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36.	Akhtar Hayat No.639	31.07.2014	29	FA	
37.	Siraj ud Din No.519	31.07.2014	38	10 <sup>th</sup>	
38.	Raheem Jan No.226	31.07.2014	42	FA	
39.	Nasreen Begum No.173	31.07.2014	50	BA	
40.	Asif ur Rehman No.372	31.07.2014	72	F.Sc	
41.	Ijaz Ahmed No.4456/E.F	31.07.2014	76	10 <sup>th</sup>	
42.	Bahadar Nawaz No.45/E.F	31.07.2014	83	MA	
43.	Khalid Ayub No.1184/E.F	31.07.2014	100	BA	
44.	Anwar Jamil No.658	31.07.2014	110	10 <sup>th</sup>	
45.	Zia ur Rehman No.634	31.07.2014	111	BA	
46.	Faza Wehmood No.565	31.07.2014	114	BA	
47.	Muhammad Asif Aziz No.455/E.F	31.07.2014	117	10 <sup>th</sup>	
48.	Amjad Ullah No.18	31.07.2014	117	BA	
49.	Saif Ullah No.201/FRP		119	MA	
50.	Nasir Iqbal No.567	31.07.2014	120	BA	
51.	Khalid Zaman No.526	31.07.2014	122	MA	Elite Force
52.	Danish Sawar No.2268/E.F	31.07.2014	130	FSc	Elite Force
53.	Rehman Ullah No.598	31.07.2014	130	FA	
54.	Faiz Muhammad No.4117/E.F	31.07.2014	140	F.Sc	Elite Force
55.	Muhammad Atif No.464/E3F	31.07.2014	142	10 <sup>th</sup>	Elite Force
56.	Arshad Tajmal No.132/	31.07.2014	158	MA	
57.	Najeeb Ullah No.93/E.F	31.07.2014	172	10 <sup>th</sup>	Elite Force
58.	Ataf Hameed No.626	31.07.2014	178	MA	
59.	Misbah Ullah No.747	31.07.2014	185	BSc	
60.	Shahid Ullah No.201	31.07.2014	192	10 <sup>th</sup>	
61.	Abdul Haq No.4721/E.F	31.07.2014	199	FA	Elite Force
62.	Haider Ali No.156	31.07.2014	207	10 <sup>th</sup>	
63.	Asif Farooq No.453 E.F	31.07.2014	286	BA	Elite Force
64.	Raza Ullah No.87/E.F	31.07.2014	309	10 <sup>th</sup>	Elite Force
65.	Sajjid Ullah No.647	30.11.2014	04	FA	
66.	Zahid Wehmood No. 641	30.11.2014	32		
67.	Mir Shan Alim No.560	30.11.2014	45		
68.	Zafar Iqbal No. 418	30.11.2014	60	F.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
69.	Yaqoob ur Rehman No. 773	20.03.2014	63	B.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
70.	Zahid Wehmood No.24/E.F	30.11.2014	62		
71.	Gul Saeed No.566	30.11.2014	68		
72.	Raheem Ullah No.89/E.F	30.11.2014	74		
73.	Nasir Wehmood No.1173/E.F	30.11.2014	78		Lien Transfer to Mardan. Seniority given as per PTC Hangu Notification Endst: No. 1009-44/S dated 25.05.2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
74.	Zia ur Rehman No. 759	30.11.2014	79	F.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
75.	Kabir Khan No.4095/E.F	30.11.2014	85		
76.	Wali Rehman No.502	30.11.2014	93		Seniority given as per PTC Hangu Notification Endst: No. 1009-44/S dated 25.05.2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.

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77.	Umar Hayat No.589	30.11.2014	96		Seniority given as per PTC Hangu Notification Endst: No. 1009-44/S dated 25.05.2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
78.	Qismat Ullah No.192	30.11.2014	97		Seniority given as per PTC Hangu Notification Endst: No. 1009-44/S dated 25.05.2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
79.	Gul Haleem No.254	30.11.2014 fail			Seniority given as per PTC Hangu Notification Endst: No. 1009-44/S dated 25.05.2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015. Also Un-qualified for promotion due B-I failure vide CPO letter No. 2236-60/E-IV, dated 21.02.2017
80.	Irshad Khan No.691	30.11.2014	113		
81.	Waheed Ullah No.460/E.F	30.11.2014	102		
82.	Aman Ullah No.62	30.11.2014	110		
83.	Irshad Khan No.691	30.11.2014	113		
84.	Muhammad Nawaz No. 832	20.03.2014	122	F.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
85.	Iftikhar Ahmed No.102 (1762/FRP)	30.11.2014	127	BA	Transfer from FRP vide PPO order No.3577-79/E-IV, dated 19.03.2015
86.	Muhammad Iqbal No.4461/E.F	30.11.2014	130		
87.	Nazeer Dad No. 618	30.11.2014	136	FSc	Seniority given as per PTC Hangu Notification Endst: No. 1009-44/S dated 25.05.2015 and Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
88.	Muhammad Anwar No.686	30.11.2014	140		
89.	Sami Ullah No.4464/E.F	30.11.2014	144		
90.	Ata ur Rehman No.577	30.11.2014	147		
91.	Tahir Yaqoob No.761	30.11.2014	166		
92.	Sikandar Nadeem No. 725	20.03.2014	171	10 <sup>th</sup>	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
93.	Nasi Ullah No.74/E.F	30.11.2014	172		
94.	Muhammad Zahid Ullah No.752	30.11.2014	174		
95.	Afraseyab No.58/E.F	30.11.2014	179		
96.	Fakhar Zaman No.394	30.11.2014	180	BA	
97.	Ahmed Noor No.3239/E.F	30.11.2014	185		
98.	Ihsan Ullah No.678	30.11.2014	186		
99.	Muhammad Fayaz No. 414	20.03.2014	187	F.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
100.	Ibraheem Khan No.749/E.F	30.11.2014	190		
101.	Rafi Ullah No.1180/E.F	30.11.2014	210		
102.	Umar Ayaz No. 767	30.11.2014	213	10 <sup>th</sup>	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
103.	Mehtab ur Rehman No.4460/E.F	30.11.2014	219		
104.	Sher Muhammad No.356	30.11.2014	227		
105.	Irfan Ullah No.4720/E.F	30.11.2014	233		
106.	Zahid ur Rehman No.100/E.F	30.11.2014	241	]	
107.	Arshad Farooq No.755	30.11.2014	246		
108.	Arshad Habib Ullah No. 1182/E.F	30.11.2014	250	B.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015

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109.	Zafran Ullah No.26 /E.F	30.11.2014	253		
110.	Salim Khan No. 87	30.11.2014	263	MA	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
111.	Muhammad Ishaq No.36/E.F	30.11.2014	270		
112.	Abdullah No. 743	30.11.2014	279	B.A	Motorway Islamabad Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
113.	Faheem Ullah No.43/E.F	30.11.2014	279		
114.	Shaheed Rehman No. 1176/E.F (Hangu)	30.11.2014	296	F.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015. Also Un-qualified for promotion due B-I failure vide CPO letter No. 2236-60/E-IV, dated 21.02.2017
115.	Sher Muhammad No. 10	30.11.2014	300	10 <sup>th</sup>	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
116.	Ihsan Ullah No. 04	30.11.2014	310	B.A	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015. Also Un-qualified for promotion due B-I failure vide CPO letter No. 2236-60/E-IV, dated 21.02.2017
117.	Muhammad Irfan Ullah No.508 (CTD)	30.11.2014	327		
118.	Fazal Rabi No.122 (SB)	30.11.2014	362		
119.	Bakhtiar Ali Shah No. 579	30.11.2014	395	BA	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
120.	Khalid Khan No. 615	30.11.2014	396	FA	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
121.	Arshad Iqbal No. 169	30.11.2014	411	10 <sup>th</sup>	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015.
122.	Muhammad Jamil No. 272	30.11.2014	426	10 <sup>th</sup>	Seniority given as per IGP KP Peshawar letter No.2288-2320/E-IV, dated 24.02.2015
123.	Zaheer Ullah No.293	30.11.2014			PPC, PR, MJ, Ist.
124.	Imtiaz No.8/PTC	31.03.2015	8		
125.	Muhammad Jalal No.666	31.03.2015	26		
126.	Kifyat Ullah No.1674/FRP	31.03.2015	29		
127.	Sajid Iqbal No.821	31.03.2015	43		
128.	Muhammad Khalid No.5838/E.F	31.03.2015	48		
129.	Bait Ullah No.614	31.03.2015	60		
130.	Qamar Nawaz No.23	31.03.2015	61		
131.	Usman Ullah No.597	31.03.2015	66		
132.	Mujahid Nawab No.561	31.03.2015	67		
133.	Ashraf Ali No. 4466/E.F	31.03.2015	67		
134.	Hamid Ullah No. 458/EF	31.03.2015	74		
135.	Inam Ullah No.86	31.03.2015	83		
136.	Hamid Ullah No.4716/E.F	31.03.2015	84		
137.	Aftab Ahmed No.1185/1138/E.F	31.03.2015	88		
138.	Muhammad Daud No.50/1208/E.F	31.03.2015	118		
139.	Rasool Khan No.4714/E.F	31.03.2015	137		
140.	Asif Iqbal No.808	31.03.2015	140		
141.	Muhammad Yaqoob No.824	31.03.2015	154		
142.	Ihsan Ullah No.622	31.03.2015	157		
143.	Raziq Nawaz No.70/1212/E.F	31.03.2015	165		
144.	Ishab Islam No.3980/E.F	31.03.2015	170		
145.	Amir Ullah No.584	31.03.2015	170		
146.	Rashid Ullah No.1324/FRP	31.03.2015	170		

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147.	Khaliq Rehman No.720	31.03.2015	189		
148.	Barkat Ullah No.308/FRP	31.03.2015	191		
149.	Iqbal Naveed No.86/E.F	31.03.2015	192		
150.	Khaliq Usman No.79/E.F	31.03.2015	198		
151.	Yasir Khan No.855	31.03.2015	199		
152.	Umer Sharif No.1368/FRP	31.03.2015	200		
153.	Taimoor Hayat No.744	31.03.2015	203		
154.	Aftab Mehmood No.4342/	31.03.2015	207		
155.	Shahidur Rehman No.198/PTC	31.03.2015	207		
156.	Muhammad Suleman No.1213/463/E.F	31.03.2015	207		
157.	Aslam Farooq No.512/	31.03.2015	208		
158.	Sajid Ullah No.637	31.03.2015	228		
159.	Nisar Ahmed No.506	31.03.2015	237		
160.	Sami Ullah No.48/E.F	31.03.2015	262		
161.	Sarwar Farooq No.468/E.F	31.03.2015	282		
162.	Farman Ullah No.596	31.03.2015	310		
163.	Sajid Iswaz No.532	31.03.2015	319		
164.	Mudassir Ahmad No. 447/EF	31.07.2015			S.Fire
165.	Wahed ur Rehman No. 18/E.F	31.07.2015	75		
166.	Muhammad Jaffar No.94/E.F	31.07.2015	129		
167.	Shafiq Islam No.261	31.07.2015	141		
168.	Faiz Ullah No.834	31.07.2015	150		
169.	Nabi Ullah No.29	31.07.2015	165		
170.	Aurangzeb No. 1746/FRP	31.11.2015	58		
171.	Muhammad Shoab No. 363	30.11.2015	71		
172.	Adil Batshair No. 532	30.11.2015	94		
173.	Muham Ullah No. 73/EF	30.11.2015	148		
174.	Pi our Rehman No. 91/EF	30.11.2015	165		
175.	Asmat Ullah No. 352/EF	30.11.2015	203		
176.	Sabir Iqbal No. 45	31.03.2016	06		
177.	Nasir Iqbal No. 1425/FRP	31.03.2016	43		
178.	Mazroo ul Islam No. 1143/FRP	31.03.2016	56		
179.	Muhammad Ataf No. 727	31.03.2016	125		
180.	Abdul Hamid No. 531	31.03.2016	133		
181.	Habib Ullah No. 853	31.03.2016	136		
182.	Qaiser Murad No.232/PTC	31.07.2016	11		
183.	Naveed Iqbal No. 138/FRP	31.07.2016	51		
184.	Umer Farooq No.2114/E.F	31.07.2016	53		
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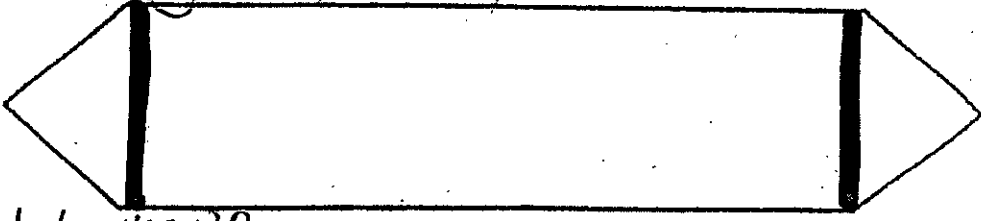
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Note:

The Police officials (concerned) may be informed regarding their seniority position. If they are not satisfied on their seniority assigned to them, they should submitted their representation within a period of one month from the date of receipt of this communication failing which no representation will be entertained.

بعد الت جواب ختم کتوخواہ سہوں ٹریبونل سہ



2020 پنجاب ایپلنٹ

عفی الرحمان بنام انسٹریٹس ڈیپارٹمنٹ

موزعہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی مکمل کارروائی متعلقہ  
آن مقام سہ کیلئے تحریر سہڈسٹریٹس ڈیپارٹمنٹ  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی مکمل کارروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور مشورشی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جہانہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حدی سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ مندر ہے۔

المرقوم 8 ہ  
ماہ جولائی 2020

واہ العبد  
کے لئے منظور ہے۔

مقام  
Punjab

Appellant

A. N. S. S. S.

Case

Case

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 7240/2020  
Ghani ur Rehman No. 274

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & other

..... Respondents

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Deponent



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

---

Service Appeal No. 7240/2020  
Ghani ur Rehman No. 274

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & other

..... Respondents

**PARAWISE COMMENTS BY RESPONDENTS.**

**Respectfully Sheweth:-**

Parawise comments are submitted as under:-

**Preliminary Objections:-**

- i. That the appellant has got no cause of action.
- ii. That the appellant has got no locus standi.
- iii. That the appeal is bad for misjoinder and nonjoinder of necessary parties.
- iv. That the appeal is bad in eyes of law and not maintainable.
- v. That the appeal is not maintainable on the grounds as, the appellant did not avail departmental forum, if so aggrieved and directly approached this honorable Tribunal.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.
- vii. That the appeal is badly barred by law & limitation.

**Facts:-**

1. Enrollment of appellant in Police department pertains to record, hence no comments.
2. According to Police Rules 13.7 list B is maintained by each superintendent of Police for selection grade constables suitable as candidates for the lower school course at Police Training College and according to Standing Order No. 3/2011 wherein the age limit is described 33 years. Subsequently, the upper age limit for appearing in B-1 examination is relaxed to 40 years under Standing Order No. 14/2014 and Police Rules 13.7 A, (Amended 2017).  
Copies Annexed A, B & C.

3. Incorrect, according to Police Rules and Standing Orders *ibid*, every A-1 qualified official is allowed to participate in B-1 examination subject to required criteria. As per Standing Order No. 3/2011, B-1 examination of 2012, marking system etc will be conducted on old pattern. Therefore, according to Standing Order No. 1/2004 "Those who are not selected during the particular examination shall have no claim to be placed on waiting list. They shall therefore, have to undergo a fresh examination for promotion in the succeeding year. Every individual shall be allowed to avail a maximum 03 chances to qualifying the B-1 examination. However, the upper age limit is relaxed with unlimited chances *vide* subsequent Standing orders and Police Rule 13.7 A. It is added that selection to the lower course school is subject to allocation of seats. Furthermore, the appellant appeared in B-1 examination failed in examination and lastly passed in the year 2012, but could not be selected on merit of allocation of seats. Copy of Standing Order and his result are **annexure D & E**.

4. Pertains to record, however, the department had filed a CPLA before august Supreme Court of Pakistan against the impugned judgment and identical judgments of Honorable Peshawar High Court, Peshawar which was converted into CP and disposed of *vide* order dated 23.09.2014. The operative para is reproduced as under:-

*"We accordingly to propose to dispose of these petition with the observation that the persons, who after age relaxation are qualified to appear in A-1 & B-1 examination shall be eligible to undergo the training and for that purpose a committee shall be constituted by the competent authority, who shall determine their merit alongwith other candidates strictly in terms of the standing order / P.P.B as mentioned above".*

Incompliance with the order of august Supreme Court of Pakistan, a committee was constituted and passed minutes of the meeting for compliance. Copy of august Supreme Court of Pakistan, order and minutes of meeting are annexure F & G.

5. Pertains to record, regarding filing a COC by the appellant, hence no comments.
6. The appellant was allotted a special seat for undergoing lower school course by the competent authority.
7. Pertains to record, hence no comments.
8. According to Rules, RPO is 1<sup>st</sup> Appellate Authority, to whom neither the appellant filed timely, any appeal / representation, nor the RPO Kohat is impleaded as respondent. In addition the appellant has been transferred and posted in district Kohat under the command of District Police Officer, Kohat who is also not impleaded as respondent.

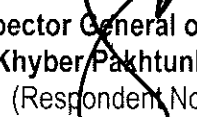
9. The appeal is not maintainable in view of above.

**Grounds:-**

- A. Incorrect, the appellant has been treated as allotted extra seat for lower school course and his seniority shall be reckoned with his batch mates / turnees with whom he qualified the lower school course.
- B. Incorrect, the appellant is treated in accordance with the Police Rules and standing orders.
- C. Incorrect, as replied above, selection for lower school course is made in accordance with the Standing Orders / Police Rules ibid.
- D. Incorrect, the appellant seniority is fixed with his colleague in accordance with the criteria mentioned in Police Rules.
- E. The respondent may also be allowed to advance other grounds during the course of hearing.

**Prayer:-**

In view of the above, it is prayed that the appeal contrary to facts, law & rules, devoid of merits and not maintainable, may graciously be dismissed with costs, please.

  
Inspector General of Police,  
Khyber Pakhtunkhwa,  
(Respondent No. 1)

  
District Police Officer,  
Karak  
(Respondent No. 2)

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

---

Service Appeal No. 7240/2020  
Ghani ur Rehman No. 274

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & other

..... Respondents

**REPLY TO APPLICATION FOR CONDONATION OF DELAY**

**Respectively Sheweth:**

Reply on application is submitted as under:-

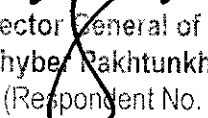
**Preliminary Objections:**

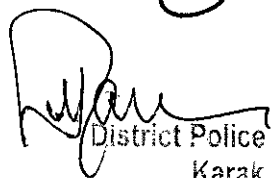
- i. That the applicant has got no cause of action.
- ii. That the application is not maintainable in its present form.
- iii. That the applicant has not come to this Hon: Tribunal with clean hands.
- iv. That the applicant / appellant is failed to explain each and every day of delay in filing of appeal.
- v. That the appeal / application is badly time barred.

**On Grounds**

1. The appeal is not maintainable in its present form and limitation as well.
2. Incorrect, the appellant has got no premaficia case and balance of convinces does not fall in his favour.
3. Each and every case has its own merits and facts. The limitation is a mandatory according to limitation act. Therefore, the limitation is applicable in the instant appeal.
4. Incorrect, reply is submitted in the above para.
5. The respondents may also be allowed to advance other grounds during the course of hearing.

Keeping in view of the above, it is submitted that the application is devoid of merits / law, without any substantiate. It is, therefore, prayed that the instant application of the applicant alongwith appeal may graciously be dismissed with cost.

  
Inspector General of Police,  
Khyber Pakhtunkhwa,  
(Respondent No. 1)

  
District Police Officer,  
Karak  
(Respondent No. 2)

**STANDING ORDER NO. 3/2011**  
Promotion of Constable to the rank of Head Constable

In supersession of all standing orders on the subject, this standing order is issued to regulate promotion of constable to the rank of Head Constable in the province of Khyber Pakhtunkhwa.

**1. Object**

The object of this standing order is to prescribe and rationalize the criteria and syllabi for constables for promotion to the rank of Head Constable. Another object is to ensure transparency in the process of bringing names of the constables on promotion list A, B & C.

**2. Applicability**

B-I examination of 2012, marking system etc will be conducted on old pattern, but B-I examination of 2013 and subsequent selection to lower school courses of 2013 will be conducted according to principles laid down in this standing order. Portion of this standing order relating to professional courses will be effective from the day after the B-I exam 2012.

**3. Distribution of posts of HC**

Posts of head constables in a district shall be distributed as under for the purpose of promotion.

- i. 90 % of the total available seats/posts of head constables in a district shall be filled through departmental promotion of constables on the basis of merit position obtained in B-I examination, subsequent selection for lower school and successful completion of lower school course.
- ii. 10 % of the total available seats/posts of head constables shall be filled through promotion of constables on part B of list C.

Promotion lists A, B & C shall be maintained by the concerned DPOs in a district in the following manner.

**4. List-A**

**Eligibility for list A examination**

- a. Constables fulfilling the following criteria are eligible to appear in this examination.
    - a. Constables who have completed at least three years of police service starting from recruit training.
    - b. Constables who have not been awarded a major punishment within the last two years.
    - c. Constable who are medically and physically fit.
- A-I examination, for bringing successful candidate on list-A, shall be held simultaneously in each district in the 1<sup>st</sup> month of a calendar year. This examination shall be conducted by Commandant PTC Hangu who will declare results by the end of January of each year. Qualifying marks shall be 50 % and the syllabus may include questions based on normal duties of a police constable and basic law which relates to the duties of a constable. Examination will be based on multiple choice questions (MCQ). There will be 100 MCQs, each carrying one mark, and time allowed will be one hour.

5. List B

List B shall be maintained by each DPO in two parts.

A. Constable considered suitable as candidates for lower school course at PTC Hangu.

B. Constables considered suitable for drill and other special courses at PTC Hangu.

Constables whose names are to be brought on part A of list B shall be made on the basis of merit determined by the Departmental Selection Board through B-I exam, marks obtained in courses etc.

Eligibility for B-I examination

Constables fulfilling the following criteria are eligible to compete for list B.

- a. Constables who have completed at least two years service on list A.
- b. Constables who have not been awarded any major punishment within the last two years preceding the B-I examination.
- c. Constables who have availed three attempts for B-I examination are not eligible.
- d. Maximum age limit for the candidates will be thirty three years.
- e. Constables must be medically & physically fit.

Written test of B-I examination will be conducted by Education Testing and Evaluation Agency (ETEA) each year at Peshawar in the month of February. Selection of constables for list B who will undergo lower school course in both the sessions at PTC Hangu shall be made on the basis of merit list prepared by the Departmental Selection Board. Departmental Selection Board established at regional level and Capital City Police area shall conduct interview of the passed candidates, award marks in other categories mentioned in this standing order and will draw final merit list for bringing the names of Constables on list B. Names on list B shall not exceed the number of seats allotted to each district for lower school course. The process of selection of constables on list B shall be finalized each year before 31<sup>st</sup> of March.

Composition of Departmental Selection Board will be as under;

- i. CCPO/Regional DIG Chairman
- ii. DPO concerned /SSP Coord Pesh Member
- iii. SP (not posted anywhere in the concerned region) Member

Note: Name of the SP shall be notified each year by the PPO.

Test & marking system

• Total marks	100 (hundred)	
i. Written test	75 (seventy five) marks	
ii. Professional courses	10 (ten) marks	<input checked="" type="checkbox"/> 6 Marks
iii. Professional abilities	10 (ten) marks	<input checked="" type="checkbox"/> CC-I, CC-II & CC-III
iv. Interview	05 (five) marks	<u>1</u> <u>0.50</u> <u>0.25</u>

Arrangements for the written test

Written test for B-1 examination conducted by ETEA will consist of seventy MCQs, each carrying one mark. These MCQs will be based on the syllabus mentioned below. Results of the written test will be announced within twenty four hours after conducting test. Date of test and venue shall be notified well in time by the CPO.

Syllabus

- a. Knowledge of basic law, regulations and police duties of constables and head constables.
- b. Basic knowledge of arms & ammunition and other police equipments.
- c. Basic knowledge of terrorist organizations operative in the country.
- d. Basic knowledge of methods & techniques adopted by terrorists.
- e. Basic knowledge of explosives and other such substances.
- f. Basic knowledge of civil, judicial and police administrative setups in a district.
- g. General knowledge of the country in general and the province of K.P in particular.

Professional courses

To rationalize professional courses of the constables in various institutions, the old method of awarding marks to individual courses is done away with and replaced by a system based on duration of the course. Any course of less than 14 days will not carry any mark. Names of the institutions which are conducting courses are given below and courses only run by these institutions shall be considered for awarding marks. All courses of one subject but under different names shall be treated as one course (e.g civil defense courses under different names). Training imparted by foreign trainers in Pakistan or abroad will be considered for awarding marks according to duration of the training/course.

- 1. Police training college Hangu and other such training institutions in the country
- 2. Government run Elite training centers in Pakistan
- 3. IB Training school at Simly
- 4. Civil Defense department (federal & provincial)
- 5. Traffic school for police
- 6. Army training centers
- 7. Special branch
- 8. Recognized forensic science laboratories
- 9. Any other professional police course run by the provincial or federal government institutions.

Duration of the course

- Fifteen to thirty days
- More than one month and upto two months
- More than two months and upto three months
- More than three months and upto four months
- Exceeding four months

Marks

- 1 (one)
- 2 (two)
- 3 (three)
- 4 (four)
- 5 (five)

**Professional abilities**

<u>Performance</u>	<u>Marks</u>
QPM	10 (ten)
PPM	8 (eight)
CC-I	1 (one)
CC-II	0.5 (half)
CC-III	0.25 (quarter)
Holders of 2 <sup>nd</sup> & 3 <sup>rd</sup> positions in recruit course	3, 2 (three & two respectively)
Best marksman	3 (three) (PTC, Elite, ATS)
1 <sup>st</sup> in parade in recruit course	1 (one) for each recruit training center under PTC Hangu
Instructors in training institutes with "A" annual assessment report with the exclusion of those covered under Police Rules 19.22.	incremental marks (two per continuous calendar year and shall not exceed six)

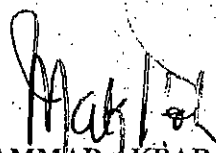
**Note**

- a. Marks earned in the above two categories i.e professional courses and professional abilities shall not exceed 10 in each category.
- b. Marks earned through all types of commendation certificates shall not exceed 2.
- c. Training courses finally passed by the candidate up to 31<sup>st</sup> December of the year ~~X~~ preceding the year of examination shall be taken into account while awarding marks.
- d. Best marksman shall be declared by a professional team of Elite instructors/examiners notified by PPO for each course for conducting test at PTC before the declaration of recruits result. Marks obtained under the category of best marksmanship shall be availed only once.

**List C**

In each district a list shall be maintained in two parts on the prescribed form. Part A will contain the names of all constables who have passed the lower school course at PTC Hangu and are considered eligible for promotion to head constable. This list shall be made according to the order of merit determined by PTC Hangu in the lower school course examination. Promotion of lower school passed constables to the rank of head constables shall be made by selection tempered by seniority.

Constables on part B of list B who have qualified drill and other special courses shall be promoted to the rank of head constables against the 10 % quota of the posts of head constables reserved for them.

  
 (MUHAMMAD AKBAR KHAN HOTI)  
 Provincial Police Officer,  
 Khyber Pakhtunkhwa, Peshawar.



OFFICE OF THE  
THE INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar

STANDING ORDER NO. 14/2014

Upper Age Limit for A-1 and B-1 Exams and  
Selection Criteria for the Lower Course

This Standing Order is issued under Article 10(3) of Police Order 2002 in pursuance of the Police Policy Board decision taken in its 4<sup>th</sup> meeting held on 29<sup>th</sup> January 2014.

2. **Aim:-** Presently, the upper age limit for A-1 and B-1 Examination is very low due to which a large number of Constables cannot avail the opportunity of further promotion and get retired as Constables. This state of affairs also results in creating frustration amongst the Constabulary, affecting their performance for the rest of their career. Similarly, there are a number of anomalies in the selection criteria for Lower School Course. This Standing is aimed at streamlining and addressing these two issues.
3. **Upper age-limit for A-1 and B-1 Exams:-** The upper age limit for appearing in A-1 and B-1 Examinations shall be as under:
  - a) A-1 Exam: 37 years;
  - b) B-1 Exam: 40 years.
4. The cut-off date for calculating the upper age limit for either of the above Examinations shall be the 31<sup>st</sup> day of the month of December falling before the respective Examination.
5. **There shall be no bar on the number of attempts for a candidate to appear either in A-1 or B-1 Examination within the prescribed age limit.**
6. Both A-1 and B-1 Examinations shall be conducted through EATA or any other well-reputed testing agency approved by the Inspector General of Police.
7. The entire process of both A-1 and B-1 Examinations shall be completed before the 15<sup>th</sup> day of March every year.
8. A Constable shall be eligible to appear in A-1 Examination if he has completed three years service, counted from the date of enlistment, and has qualified Recruit Course.
9. Qualifying marks for A-1 and B-1 Examinations shall be as under:
  - a) A-1 Examination: Not less than 40% of the total;
  - b) B-1 Examination: Not less than 50% of the total.

9.1 The Inspector General of Police may, by a general or special order, raise the minimum qualification marks for A-1 or B-1 Examination from time to time if so required due to any reason.

9.2 B-1 qualified Constables shall be selected for the Lower Courses of the same year in the order of merit of B-1 Examination against the available number of Lower Course seats. The B-1 Examination merit list shall not be valid for the next year.

10. Constables qualifying A-1 Examination shall stand eligible for appearing in B-1 Examination, subject to the fulfillment of other requirements.

11. A candidate shall be eligible to appear in B-1 Examination, subject to fulfilling other requirements, if he has earned minimum 6 marks, at any stage after recruitment, in the "Graded Professional Courses" or any other course so determined by the Inspector General of Police. However, a candidate obtaining 4 marks in the "Graded Professional Courses" or any other course so determined by the Inspector General of Police shall be eligible to appear in B-1 Examination conducted during the year 2015.

12. **Selection Criteria for Lower School Course:-** Those Constables who qualify B-1 Examination shall be eligible for the Lower School Course on the basis of seniority and order of merit.

13. The number of seats for the Lower School Course shall be fixed every year by the Inspector General of Police on the recommendation of the following committee.

- a) The Additional IGP Headquarters;
- b) The DIG Training;
- c) The AIG Establishment.

14.1 The above Committee shall also allocate seats for the Lower School Course to each District in accordance with the ratio of the total strength of Constables in that District worked out against the total number of seats.

14.2 No seats of the Lower School Course shall be allocated to any Police unit except Districts.

15. **A consolidated seniority list of all Constables enlisted in a District, or having domicile of the District in case of Constables serving in FRP, shall be maintained in that District which shall include seniority-wise names of all Constables of the District whether such Constables are serving in that District or they have been transferred to or working in other Police Units, e.g. Special Branch, FRP, CTD, Investigation, Elite Force, Range Officer, CPO, etc.**

15.1 The concerned Heads of District Police shall select B-1 qualified candidates for Lower Course strictly in accordance with the seniority and merit position as reflected in the consolidated seniority list mentioned in section 15 above; whether the Constables are, at the

time of selection, serving in that District or have been transferred to or working in any other Police Unit, e.g. Special Branch, FRP, CTD, Investigation, Elite Force, Range Officer, CPO, etc.

16. **Power to remove difficulties:-** If any difficulty arises in giving effect to this order, the Provincial Police Officer may by notification make such provisions as deemed appropriate.

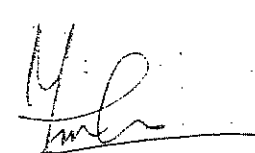
17. **Amendment:-** All previous Standing Orders on the subject, to the extent of the provisions of this order, shall stand amended.

(NASIR KHAN DURRANI)  
Provincial Police Officer  
Khyber Pakhtunkhwa  
Peshawar

No:- 920-990/GB dated Peshawar the 17<sup>th</sup> October 2014

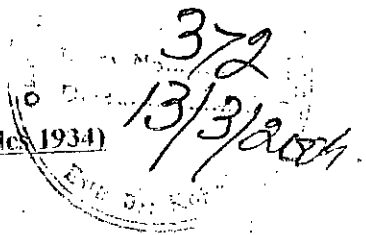
Copy of the above is forwarded for information and necessary action to:

1. All Heads of Police Offices in Khyber Pakhtunkhwa;
2. PRO to PPO;
3. Registrar CPO.

  
(MUBARAK ZEB) PSP  
DIG Headquarters  
Khyber Pakhtunkhwa  
Peshawar

## STANDING ORDER NO. 01 OF 2004

(Chapter XIII of NWFP Police Rules 1937 and Punjab Police Rules 1934)

PREAMBLE.

The August Supreme Court of Pakistan vide its judgement dated 05-08-1998 in the case titled as ASI Sadique Akbar vs ASI Sanobar Khan, held that standing order issued by the Inspector General of Police without the prior approval of the Provincial Govt. required under section 12 of Police Act 1861 (now repealed) is of no legal authority and status. In view of above, standing order No. 10 of year 1987, which describes the procedure/method of A-1 & B-1 examination system of marking and subsequent selection of constables for courses by the D.P.C., carries no legal status and authority. The existing circumstances, therefore render it necessary to issue a standing order describing procedure of A-1 & B-1 exams and marking system, for the selection and promotion of efficient men amongst the constables.

Now, therefore in exercise of the powers, conferred upon me under article 10 (3) of Police Order 2002 this standing order is issued.

APPLICABILITY.

The standing order shall apply to all the recruited police personnel in the NWFP and shall come into force at once.

AIM.

To elaborate a procedure of A-1 and B-1 examination, marking system, publication of results, selection of constables for "Lower College Course" and maintenance of promotion lists as per requirement of the present time and efficiency of Police personal.

SCOPE OF STANDARD.

Promotion to lists A-1, B-1, selection to "Lower College Course" and Promotion to list C-1, and maintenance of promotion lists

SCHEDULE OF EXAMINATION

Examinations shall be held in all districts for promotion of constables for list-A-1 & B-1 during first quarter in each year. Commandant PTC Hangu shall notify the dates and conduct the examination.

QUALIFYING SERVICE FOR A-1 EXAMINATION.

A constable whose name appears on promotion list-A and who has at least three years of experience in the district Police shall qualify to participate in A-1 examination.

SYLLABUS.

Syllabus for examination shall be based on the following duties which a Constable is expected to perform under Police Rules 14, 16 and 17.

- A. Escort duties.
- B. Guard duties.
- C. Law and Order duties.

Accepted  
M. J. S.

60

- D. Patrolling.
- E. ~~Anti riot duties.~~
- F. Nakabandies.
- G. Raids in urban and rural areas.
- H. Duties of a beat constable in urban areas.
- I. Rural policing including collection of intelligence on criminals, surveillance of bad characters and criminals and service of process, etc.

**EXAMINATION.**

The examination shall be held in law

Law That amount of law which is applicable to the functions of a Constable as well as Police practical work pertaining to constable level.

Examination shall be held simultaneously in all districts of the province. This examination shall be conducted by the Commandant, PTC Hangu who shall prepare the papers, conduct this examination, mark them and declare the results. It shall be the duty of DPO to notify the names of the successful candidates according to the vacancies available and bring their names on promotion list-I. Every qualified constable shall be allowed to avail a maximum of three chances to qualify this examination.

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**QUALIFYING SERVICE FOR B-I EXAMINATION.**

Those constables who have completed 2 years service on list A-I shall be eligible to appear for B-I examination. It shall be the responsibility of DPOs to ensure that constables are assigned duties in such a manner that they have experience of a few of the following functions, which shall form the syllabi for the B-I Examination.

- a. Madad Moharrir in a Police Station.
- b. Naib Court.
- c. ~~Detective foot Constable.~~
- d. Madad Moharrir in Lines.
- e. Assistant to OASI.
- f. Beat Constable in Urban Area
- g. Rural Policing, i.e. collection of intelligence on Criminals, surveillance of bad Characters / criminals and service of process.

*Accepted  
28/1/03*

B-I examination shall similarly be held by the Commandant, PTC Hangu. The examination shall be primarily based on the capabilities of the candidates in functions given above which shall be required to be performed during their tenure as constables. The question paper shall allow sufficient choice.

**NOTIFICATION OF RESULTS.**

The number of candidates to be brought on promotion list B-I shall be notified by the respective Regional heads/DIGs on the basis of the number of seats that are allotted for the "Lower College Course" during the particular year.

Promotion to list B-I shall be based on a merit list published by the Commandant PTC Hangu for each district

Those who are not selected during the particular examination, shall have no claim to be placed on a waiting list. They shall therefore have to undergo a fresh examination for promotion in the succeeding year. Every individual shall be allowed to avail a maximum of ~~four~~ (3) chances to qualify the B-I examination.

*three*

MARKING SYSTEM FOR LIST A-1, B-1 & "LOWER COLLEGE COURSE"

Selection for entry to A-1, B-1 and "Lower College Course" shall be based on the marking system, which also now includes a written examination for A-1 and B-1.

Weightage of approximately 50% has been given to heads A, B, C, D & E in the marking system whereas 50% weightage has been given to Section 'F' in which the requirement of the written examination has been laid. A study was conducted which indicated that Constables eligible for list A-1 score an average of 10 marks (minus marks for C.C.) and a candidate for B-1 scores an average of 15 marks (minus marks for C.C.).  
The total marks for written examination for A-1 shall be 10 & for B-1 15.

Selection for "Lower College Course" shall be based on marking system but there shall be no written examination as laid down in Section 'F'.

Consideration for those who are likely to become overage shall continue to be given as admissible under the rules.

The original section dealing with personal claim and commendation certificates is being deleted and shall therefore no longer qualify for award of marks.

Selection shall be made purely on merit based on the marking system, i.e. combination of the Sections A, B, C, D, E & F of the new marking system for A-1 and B-1 and A, B, C, D and E for "Lower College Course".

Promotion to List C-1

On Successful completion of "Lower College Course".

*(Signature)*  
(Muhammad Riffat Pasha)  
Provincial Police Officer,  
NWFP Peshawar.

No. 2715-70/E dated Peshawar the 21-2-2004.  
Copies to:

- 1. All Dy. Inspector General of Police in NWFP.
- 2. Commandant PTC Bangu.
- 3. Commandant FRP Peshawar.
- 4. All Assitt. Inspector General of Police in NWFP.
- 5. All DPOs in NWFP (with spare copies one for each Police Station).

*Ec*  
*A*  
~~D. I. O. POLICE~~  
~~KOFAD~~  
10/3.

*Accepted*  
*(Signature)*



## KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, THURSDAY, 16<sup>TH</sup> MARCH, 2017.

### OFFICE OF THE PROVINCIAL POLICE OFFICER GOVERNMENT OF THE KHYBER PAKHTUNKHWA

#### NOTIFICATION

*Peshawar, dated the 16.03.2017.*

No.755/Legal.-In exercise of the powers conferred by section 140 of the Khyber Pakhtunkhwa Police Act, 2017 (Khyber Pakhtunkhwa Act No. II of 2017), the Provincial Police Officer, with the approval of Government, is pleased to direct that in the Police Rules, 1934, the following further amendments shall be made, namely:

#### AMENDMENTS

1. In rule 12.1, after sub-rule (4), the following new sub-rules shall be added, namely:

"(5) No official of police establishment shall be allowed to change the cadre in which he was initially appointed.

(6) The official appointed on contract shall not perform duty in any other Unit except in the Unit for which his services are hired. The period of contract shall be for one year and may be renewed upon satisfactory performance report."

2. For rule 12.4, the following shall be substituted, namely:

"12.4. Recruitment in Traffic Warden Service.---(1)Direct recruitment in the Traffic Warden Service shall be in rank of Constable and Assistant Sub-Inspector in the same manner as provided for initial recruitment of Constable and Assistant Sub-Inspector in the general cadre.

(2) On appointment, the Constable and Assistant Sub-Inspector in addition to the basic recruit and probation courses, shall undergo mandatory Elite Course and Specialized Traffic Training Courses as determined by Provincial Police Officer.

(3) The ratio of Fast Track Promotion in the Traffic Warden Service, in the ranks of Assistant Sub-Inspector, Sub-Inspector and Inspector, shall be same as provided for Assistant Sub-Inspectors, Sub-Inspectors and Inspectors under the Khyber Pakhtunkhwa Police Act, 2017.

(4) The Constable and Assistant Sub-Inspector shall be promoted on seats allocated for them in their respective districts and regions. The promotion within the Traffic Wardens shall be upto the rank of Inspector subject to completion of requisite promotional and capacity building courses as determined by Provincial Police Officer.


(5) An Inspector of Police Warden Service shall be eligible for promotion as Deputy Superintendent of Police against general posts of Deputy Superintendents of Police, if he successfully completes the requisite courses including Advance Course provided under these rules and also qualifies specialized courses of minimum two (02) weeks each in the Police School of Intelligence, Police School of Investigation, Police School of Tactics and Police School of Public Disorder and Riot Management besides (04) weeks general policing orientation course and (08) weeks field attachment with Sub-Divisional Police Officer office and Police Stations. Deputy Superintendent of Police so promoted shall be eligible to be posted anywhere on any assignment.

27. Any family member (as included in Colum No. 18) arrest, prosecuted, as in any case, terrorism or otherwise and restricted or exhausted, if so full particulars including dates should be furnished. \_\_\_\_\_

28. Declaration:

- (i) I solemnly affirm and declare that all the information given above is correct to the best of knowledge and I have not concealed any face.
- (ii) I further undertake that neither me nor any of my family members is involved in any suspicious criminal activity and no case is registered against me except as given in column No. 22 I may be prosecuted if I have concealed any facts or have given wrong information.

Name \_\_\_\_\_ s/o \_\_\_\_\_

Thumb Impression 

Signature \_\_\_\_\_

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

Note:-Attach certified copies of the following documents:-

- 1. CNIC
- 2. Photograph
- 3. Discharge Certificate (If ex-employee)."

5. After rule 12.26, the following new rule shall be added, namely:

**"12.26-A. Deputation in Police Department.**---Officers/officials on deputation from other Provincial and Federal Departments or autonomous bodies to Police Establishment shall not be allowed except for relevant specialized duties. The deputationist so transferred shall only be posted in Units/Branches relevant with their specialization, skill and experience."

6. After rule 13.1, the following new rule shall be added, namely:

**"13.1A. Meeting of Departmental Promotion Board or Committees.**---The Departmental Selection Board or the Committees, as the case may be, shall hold minimum three (03) promotional meetings in a year as follows:

- (i) first meeting before 31<sup>st</sup> of March;
- (ii) second meeting before 31<sup>st</sup> of July; and
- (iii) third meeting before 30<sup>th</sup> November."

7. After rule 13.7, the following new rules shall be inserted, namely:

**"13.7A. Criteria for placement on List A and List B.**---(1) A Constable appointed under these rules shall be placed on List A as provided in rule 13.6, if he has-



- (i) completed three (03) years service;
- (ii) qualified recruit course as provided in these rules; and
- (iii) qualified A1 examination; provided that upper age limit for appearing in A1 examination shall be thirty-seven (37) years and qualifying marks shall not be less than forty percent (40%) of the total marks.

**Note:**

The syllabus for A1 examination shall be as per Appendix 13.7A (I).

(2) Subject to rule 19.10, a Constable placed on A1 list shall be eligible for appearing in B1 examination for the purpose of eligibility on List B as provided in rule 13.7. A Constable, who qualifies A1 examination, shall be eligible to appear in B1 examination to be held next year. The syllabus for B1 examination shall be as per Appendix 13.7A (II):

Provided that upper age limit for appearing in B1 examination shall be forty (40) years and qualifying marks shall not be less than fifty percent (50%) of the total marks.

(3) The cut-off date for calculating the upper age limit for either of the above examinations shall be the 31<sup>st</sup> day of the month of December falling before the respective examination.

(4) There shall be no bar on the number of attempts for a candidate to appear either in A1 and B1 examination within the prescribed age limit.

(5) Both A1 and B1 examinations shall be conducted through an accredited testing agency approved by the Provincial Police Officer.

(6) The entire process of both A1 and B1 examinations shall be completed before the 31<sup>st</sup> day of March every year.

(7) The Provincial Police Officer may by general or special order raise the minimum qualification marks for A1 and B1 examinations from time to time.

(8) Constables who qualifies B1 examination shall be eligible for the lower school course in the order of merit in B1 examination. The Head of the District Police shall select B1 qualified candidates for lower school course strictly in accordance with consolidated seniority list as provided in sub-rule (13).

(9) The examination for the lower school course shall be conducted through an accredited testing agency approved by Provincial Police Officer.

(10) The duration of lower school course shall be sixteen (16) weeks. The lower course qualified Constables shall also undergo six (06) weeks Field Tactics Course under supervision of Commandant Elite Force.

(11) In each district on the basis of total strength of Head Constables of the district including share of Central Units, the Provincial Police Officer on the recommendation of the following Committee fix every year the number of seats for the lower school course:

- (a) the Additional Inspector General of Police Headquarters;
- (b) the Deputy Inspector General Training;

Failed BI Exam 2014 Annex "E"

P-19

Failed BI Exam Result held on  
02-03-2014.

  
District Police Officer  
(Karak)

Failed BI Exam 2015

Failed BI Examination held on  
15-03-2015.

  
District Police Officer  
(Karak)

Failed BI Exam 2016

Failed BI Examination ETEA held  
on 10-04-2016.

  
District Police Officer  
(Karak)

Failed BI Exam 2017

Failed BI Examination (ETE A) held  
on 22-04-2017.

  
District Police Officer  
(Karak)

Failed BI Examination 2018

Failed BI Examination (ETE A) held  
on 25-02-2015.

  
District Police Officer  
(Karak)

Passed Lower college course.

Passed lower college course vide comdt PTC Hafiz Performance  
Certificate received via memo: No. 4052/EG dt. 28.3.19 from  
the office of DPO, Karak.

IN THE SUPREME COURT OF PAKISTAN  
(APPELLATE JURISDICTION)

PRESENT:

MR. JUSTICE ANWAR ZAHEER JAMALI  
MR. JUSTICE EJAZ AFZAL KHAN  
MR. JUSTICE QAZI FAEZ ISA

C. P. Nos. 21-P, 46-P to 48-F, 56-P, 105-P, 113-P, 120-P, 176-P, 177-P, 187-P to 191-P, 195-P to 199-P, 213-P, 264-P to 268-P and 274-P of 2014

(On appeal against the judgment dated 31.10.2013, 12.11.2013, 21.11.2013, 10.12.2013, 11.12.2013, 12.12.2013, 28.1.2014, 14.3.2014, passed by the Peshawar High Court, Peshawar in W. P. Nos. 2565-P, 2614-P, 2616-P, 2885-P, 758-A, 520-D, 2967-P, 2765-P, 2615-P, 2919-P, 3104-P, 3117-P, 3201-P, 3282-P, 3284-P, 2892-P, 3173-P, 3228-P, 3289-P, 3226-P, 2991-P, 2999-P, 3030-P, 1909-P, 2698-P of 2013)

Inspector General of Police, Peshawar and others.  
Govt. of KPK thr. Chief Secy. and others.  
Provincial Police Officer, Govt. of KPK Peshawar and others.  
Govt. of KPK thr. Secy. Home and Tribal Affairs and others.  
Govt. of KPK thr. Chief Secy. Peshawar and others.

(in 21-P/14)  
(in 46-P/14)  
(in all cases)  
(in 48-F/14)  
(in 56-P/14)  
... Petitioners

Versus

Fekharul Islam and others.  
Shah Wali Khan and another.  
Nasir Mahmood and others.  
Burair Abbas.  
Mazhar Ali Khan and others.  
Anayatullah and others.  
Sajid Alam.  
Saleem Shah and others.  
Mehboob Alam and others.  
Muhammad Jasim.  
Huzrat Ali and others.  
Sejjid Iqbal and another.  
Ghulam Rehman.  
Muhammad Tariq.  
Nageebullah.  
Ibrar Hussain.  
Yaqoob Khan.  
Rasheed Ahmad.  
Waheed Gul.  
Hazrat Sarnad.  
Riaz Khan.  
Aziz ur Rehman.  
Constable Gul Sahib Shah.  
Constable Naor Manan.  
Shauka Ali.

... Respondents

For the petitioners:

Mr. Waqar Ahmed Khan, Addl. A. G. KPK.  
Mr. M. Younis, S. P. Legal, (CPO, Pash)  
Janis Khan, DSP, (Legal), Abbotabad  
M. Ismail, DSP, Karak.

For the respondents:  
(On behalf)

Mr. Ghulam Nabi Khan, ASC. (in 177-P, 187-P,  
188-P, 190-P, 191-P, 196-P to 199-P and  
213-P of 2014)

Date of hearing:

23.09.2014

ATTESTED

Superintendent,  
Supreme Court of Pakistan

## O R D E R

ANWAR ZAHEER JAMALI, J. All the above filed petitions for leave to appeal arise out of eight judgments of identical nature passed in Writ Petitions No. 2565-P, 2614-P, 2616-P, 2885-P, 758-A, 520-D, 2967-P, 2765-P, 2615-P, 2919-P, 3104-P, 3107-P, 3281-P, 3262-P, 3284-P, 2892-P, 3173-P, 3228-P, 3289-P, 3226-P, 2991-P, 2999-P, 3030-P, 1909-P, 2698-P of 2013) whereby the grievance agitated by the petitioners before the Peshawar High Court as regards their issue of age relaxation was redressed by the Court substantially in the following terms:

7. The petitioners, in view of Rule 13.7 of Police Rules, 1934 were entitled to be given preference in the matter of selection for undergoing training of the requisite course because of their ages, but juniors to them were selected; hence not only violation of rules is apparent in their cases but discriminatory treatment is also evident on the other hand. The cases of petitioners are similar to the cases of those petitioners who have been given relief by this Court in the above mentioned writ petitions and the propriety thus demands giving similar relief to petitioners.

8. Accordingly, these writ petitions are accepted with directions to respondents to immediately arrange the sending of petitioners to Hanau Training College for the requisite course without fail and without loss of time. No order as to costs".

2. The learned Addl. A. G. KPK has appeared before the Court and made reference to the standing order dated 11.03.2014 to show that this standing order has further addressed the issue of age relaxation agitated by the petitioners before the High Court. He therefore submits that to this extent now the petitioners have no grievance against the impugned judgment. He further submits that, however, while passing the impugned judgments learned Division Benches of the Peshawar High Court have not taken into account the spirit and application of standing Order No. 3 of 2011 which provides for the mode of eligibility for examination etc. He submits that petitioners will be satisfied with the disposal of all these petitions, in the terms that the impugned judgments are modified only to the extent that after the age relaxation allowed by the Peshawar High Court is affirmed by the





C.P.No.21-P/2014, etc

department vide Police Policy Board decision dated 12.02.2014. The selection of the candidate for A1 and B1 examination will be made on merit as per criteria laid down in PPB 13 of 2014 and that for this purpose a Committee will be constituted who will examine the merit list dated 11.7.2013 afresh as a whole.

3. In reply to the above, Mr. Ghulam Nabi Khan, ASC has insisted that the selection of remaining candidates should be taken up on merit on the basis of the merit lists already prepared at the departmental level in July, 2013. We are not much impressed with his submission for the reason that the list of candidates who are to be selected for the forthcoming training programme is to be prepared by the department on an annual basis. There remains no doubt in this regard especially in the light of the statement to this effect made by the learned Addl. A. G. that after the decision on the issue of age relaxation, the merit criteria in terms of standing order by PPB Order No. 13 of 2014 will be followed strictly across the board and for that purpose

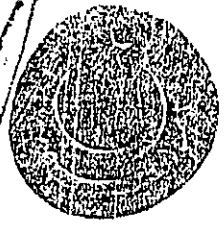
treatment to all the petitioners before the High Court and others in similar position will be just, fair, equitable and without any discrimination

4. We accordingly propose to dispose of these petitions with the observation that the persons, who after age relaxation are qualified to appear in A1 and B1 examination shall be eligible to undergo the training and for that purpose a Committee shall be constituted by the competent authority who shall determine their merit alongwith other candidates strictly in terms of the standing order/P.P.B as mentioned above.

5. In view of the above, the delay in the filing of these petitions is condoned and all these petitions are converted into appeal and disposed of as such alongwith other pending applications. Henceforth, if the respondents or the petitioners herein have any other grievance, they may agitate the same before the proper forum.

*Handwritten signatures and notes:*  
Amir Zuhair Jinnah  
Fazal Afzal Khan  
Guzi Faiz





OFFICE OF  
INSPECTOR GENERAL  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE,  
PESHAWAR

No. 2288-2324E-IV dated: 27/02/2015

- To: -
1. The Capital City Police Officer, Peshawar.
  2. All Regional Police Officer, Khyber Pakhtunkhwa.
  3. The Commandant, CPC University Campus, Peshawar.
  4. All District Police Officers, Khyber Pakhtunkhwa.

Subject:- COMPLIANCE WITH THE JUDGMENT OF HONORABLE SUPREME COURT OF PAKISTAN PASSED IN C.Ps NO. 21-P, 46-P TO 48-P, 56-P, 105-P, 113-P, 120-P, 176-P, 177-P, 187-P TO 191-P, 195-P TO 199-P, 213-P, 264-P TO 266-P AND 274-P OF 2014.

Memo:-  
Appeal was lodged against the judgment dated 31.10.2013, 12.11.2013, 21.11.2013, 10.12.2013, 11.12.2013, 12.11.2014, 28.01.2014 and 11.03.2014 passed by the Peshawar High Court in Writ Petition No. 2565-P, 2614-P, 2616-P, 2885-P, 758-A, 520-D, 2967-P, 2765-P, 2615-P, 2919-P, 3104-F, 3117-P, 3281-P, 3282-P, 3284-P, 2892-F, 3173-P, 3228-P, 3289-P, 3226-P, 2991-P, 2999-P, 3030-P, 1909-P and 2698-P of 2013.

The Honorable Supreme Court of Pakistan disposed of subject cited C.P's vide order dated 27.09.2014 and directed that a committee shall be constituted by competent authority who shall determine their (Respondents) merit along with other candidates strictly in terms of the standing order and Police Policy Board as mentioned above.

In compliance with the judgment of Honorable Court a committee was constituted which examined the cases of overage candidates selected by the department as pointed out by the Honorable Supreme Court of Pakistan and those who were granted relief by Peshawar High Court vide judgments impugned in the appeal before Supreme Court of Pakistan.

The committee made recommendations that 180 overage candidates selected for lower school course on recommendation of Commandant Police Training College Hangu were wrongly selected as neither they had qualified the B-I examination nor they were on merit of the concerned district/unit for selection of lower school course.

*The wrong selection of overage candidates by the department was based by the Peshawar*

High Court for grant of relief to others similar overage candidates. The committee recommended that age for B-I examination has been increased from 33 to 40 years and all the 180 candidates and those who were granted relief by the High Court are eligible for appearing in B-I examination therefore, all of them shall appear in the B-I examination and their seniority shall be fixed with the candidates who qualified lower school course in the last term of 2014.

Competent authority has accorded approval to the decision of committee therefore, the 180 candidates and those who were grant relief by Honorable High Court shall appear in the special B-I examination to be announced soon and their seniority will be determined accordingly.

Ends (2)

(Syed Fida Hassan shah)  
AIG/Establishment  
For inspector general of police,  
Khyber Pakhtunkhwa,  
Peshawar.

No. /E-IV dated Peshawar the: / 2015

Copy of above is forwarded for information to the:-

1. Addl: IGP/HQs Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/Special Branch Khyber Pakhtunkhwa, Peshawar.
3. Addl: IGP/Commandant FRP Khyber Pakhtunkhwa, Peshawar.
4. Addl: IGP/Elite Force Khyber Pakhtunkhwa, Peshawar.
5. Deputy Inspector General of Police, Headquarters, Peshawar.
6. Commandant PTC Hangu.
7. Registrar Supreme Court of Pakistan w/r to this decision dated 23.09.2014 letter No. C.As. 1488-1492-1512/14-SCJ dated 11.11.2014.
8. Registrar Peshawar High Court Peshawar w/r to Peshawar Court Peshawar decision dated 03.02.2015 letter No. 20559/Judl: dated 27.11.2014.
9. Section Officer (Courts) Govt: of KPK Home & TAs Department Peshawar w/r to his letter No. SO(Court) HD7-53/2013/Vol-I dated 22.12.2014.
10. AIG/Legal CPO, Peshawar w/r to his letter No. 820-25/Legal dated 12.02.2015.

(Syed Fida Hassan shah)  
AIG/Establishment  
For inspector general of police,  
Khyber Pakhtunkhwa,  
Peshawar.

1

**BEFORE THE SERVICES TRIBUNAL, KPK,**  
**PESHAWAR**

Service Appeal No. 7240/2020.

Ghani ur Rehman No 274 .....**Appellant**

**V E R S U S**

**Inspector General of Police and others...Respondents**

**REJOINDER ON BEHALF OF THE**  
**APPELLANT**

**Respectfully Sheweth:**

Reply on the preliminary objections:

1. That almost all the preliminary objection raised by the Respondents are hallowed and without any force and substance. Appellant has filed the service Appeal in pursuance of order of Peshawar High Court, Peshawar dated 23.10.2018, passed in COC No 265-P/2017 in WP No 3117-P/2013, Copy already enclosed with original Appeal. Therefore the Appeal is maintainable and Appellant has got good cause of action. Again the matter involves question of determination of Seniority which falls within the ambit of terms and condition of Service therefore



this Hon'ble tribunal has got exclusive jurisdiction of looking into the matter. Furthermore, the Appeal was filed after exhausting the departmental remedy. Therefore the preliminary objections agitated by Respondents are not tenable.

2. That reply of Respondents in response to the facts and grounds of the Appeal is also evasive. Respondent No 1 admitted the right of Appellant for selection to Lower School Course on the basis of qualifying B-I examination in the year 2012 vide order dated 23.10.2018. Copy already enclosed with Original Appeal. The stance of Respondent for determination of the seniority of Appellant was not accepted by the Hon'ble High Court and held that the service Tribunal has got jurisdiction in such matters. Appellant had qualified B-I examination in the year 2012 which is the base line and pre-condition for selection to Lower School Course therefore Appellant has got every right of fixation of Seniority with colleague officers who qualified lower on the basis of B-I Exam 2012. The Respondents delayed the selection of Appellant for long period of about 06 years. Appellant was selected for the Lower School Course in compliance with orders of Peshawar High Court dated 28.01.2014 passed in WP No. 3117-P/2013 followed by COC No 265-P/2017. Copies already enclosed with original

Appeal. Appellant referred for long period of about 06 years due to inaction of Respondents and also forced for undue litigations, therefore Appellant is entitled for fixation of Seniority with badge mate of the Lower School Course of the year 2012.

**ON FACTS:**

1. In Reply to Para 1 of the Comments. Appellant passed B-I examination in the year 2012, but were not sent to Lower School training malafidely. Appellant invoked the jurisdiction of the Hon'ble Peshawar High Court in Writ Petition No 3117/2013 which was allowed and Respondent were directed to send the Appellant for Lower School Course training immediately. The Respondent were again reluctant to comply with the order of the Hon'ble Peshawar High Court and Appellant was constrained to file COC No 265-P/2018. During the COC proceedings Respondents created special seat upon the direction of court and Appellant was resultantly sent for lower School Course training at PTC, Hangu, which Appellant completed successfully. Since Appellant was illegally deprived from his accrued right and he was constrained to file Writ Petition and then COC. During the aforesaid proceeding 06 years elapsed, which is not the fault of Appellant and for which Appellant cannot

(4)

be penalized and the fault lies on the part of Respondents. The colleagues of Appellant are serving as ASI and SI and they have also qualified intermediate course, therefore the treated of the Respondents amounts to, sheer discrimination which is against the spirit and provision of Article 27 of the Constitution of Islamic republic of Pakistan, 1973.

2. Para No 2 of the comments is incorrect, hence denied. detailed answer is given above. The rule mentioned by Respondents are not strictly applicable in the case of Appellant.
3. Para No 3 of the comments is incorrect, hence denied. detailed answer is given above.
4. Para No 4 of the comments is incorrect, hence denied. detailed answer is given above.
5. / Para No 5 of the comments is incorrect, hence denied. detailed answer is given above.
6. Para No 6 of the comments is incorrect, hence denied. detailed answer is given above.
7. Para No 7 of the comments is incorrect, hence denied. detailed answer is given above.

5

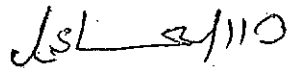
8. Para No 8 of the comments is incorrect, hence denied. detailed answer is given above.
9. Para No 9 of the comments is incorrect, hence denied. detailed answer is given above.

Reply on Grounds:

A to E. Grounds A to E of the comments are totally incorrect, baseless, without any justification and that of the main service appeal are correct and according to law.

It is, therefore, most humbly prayed that on acceptance of this rejoinder, the contents of the comments being devoid of force, be ignored and appeal may be allowed as prayed for in the main appeal.

Appellant  
Through

  
**ASHRAF ALI KHATTAK**  
Advocate Supreme Court

Date: 12.11.2021

6

**BEFORE THE SERVICES TRIBUNAL, KPK,**  
**PESHAWAR**

Service Appeal No. 7240/2020.

**Ghani ur Rehman No 274 .....Appellant**

**V E R S U S**

**Inspector General of Police and others...Respondents**

**AFFIDAVIT**

I, Ghani ur Rehman, Belt No 274, do hereby solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

*H. W. G. 12/11/2020*  
Ghani ur Rehman Advocate  
Oath Commissioner  
Endst. No. 3370-75

*[Signature]*  
**DEPONENT**

**LIST SHOWING THE NAMES OF CONSTABLES ON PROMOTION LIST B-(I)  
AND THEIR MARKS CALCULATED IN ACCORDING WITH STANDING  
ORDER NO. 10/1987 AND STANDING ORDER NO. 01/2004/03/2011**

*Legible Copy*

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
1	Muhammad Ali No.189/3792E	01.10.1982	12.02.2002	
	Name of Courses	Marks	Education	Marks
a.	Drill Course	06	B.A	08.00
b.	Finger print course	01	B-1	09.05
c.	Bomb Reconnaissance	02	Service	10.01.19 07.00
d.	Elite course	04	D.A.R Period	01.06.10 01.50
			Rider Squad	01.08.20 01.00
		13	Drill Inst: at PTC	02.00
			Courses	04 13.00
			Total	41.55
			Punishment	01 02.00
			Net	- 39.55

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
2	Amjad Kamal No.513	03.02.1984	12.02.2002	
	Name of Courses	Marks	Education	Marks
a.	ATS course Islamabad	03	10th	04.00
b.	Drill course	06	B-1	07.50
c.	Bomb Reconnaissance	02	Service	10.01.19 07.00
d.	Finger print course	01	D.A.R Period	01.09.05 01.50
e.	Bomb disposal	02	ATS Squad	02.06.04 02.00
f.	Fire Man course	01	courses	6 15.00
		15	Total	37.00
			Punishment	- -
			Net	- 37.00

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
3	Saddar Nawaz No.56/EF	12.02.1984	10.11.2003	
	Name of Courses	Marks	Education	Marks
a.	Finger print course	01	F.A	06.00
b.	Tear Gas course	01	B-1	09.30
c.	Elite course	04	Service	08.04.21 06.00
d.	Bomb Reconnaissance	02	DAR Period	02.05.24 01.50
e.	Traffic course	03	Rider squad	01.01.06 01.00
			Courses	06 13.00
f.	Bomb disposal course	02	Total	36.80
		13	Punishment	- -
			Net	- 36.80

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
4.	Khalid Rehman No.1167/E	15.04.1979	25.10.2004	
	Name of Courses	Marks	Education	Marks
a.	Elite course	04	F.A	06.00
b.	Bomb Reconnaissance	02	B-1	10.45
c.	Fire Man course	01	Service	07.05.06 06.00
d.	Bomb disposal course	02	FRP Period	- 01.50
e.	Traffic course	03	Courses	05 12.00
			Total	35.95
		12	Punishment	- -
			Net	- 35.95

*Attested*  
*Mansoor*  
District Police Officer  
(Karak)

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
5.	Saif ur Rehman No.709	02.03.1981	16.02.2002	
	Name of Courses	Marks	Education	Marks
a.	Proficient course	01	M.A	10.00
b.	I-E-D course	02	B-1	10.00
c.	Bomb Reconnaissance	02	Service	10.01.15 07.00
d.	Traffic course	03	FRP Period	01.50
e.	C.D.R planning org operational control course	01	Courses	06 10.00
			Total	38.50
f.	N.B.C course	01	Punishment	- 03.00
			Net	- 35.50
		10		

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
6.	Muhammad Aadil No.298	14.04.1979	01.06.2006	
	Name of Courses	Marks	Education	Marks
a.	Bomb Reconnaissance	02	M.A	10.00
b.	Fire Man course	01	B-1	09.60
c.	Traffic course	03	Service	05.10.00 05.00
d.	Fire prevention	01	D.A.R Period	02.07.16 01.50
e.	Leading Fire Man	01	Courses	06 09.00
			Total	35.10
f.	N.B.C course	01	Punishment	- -
			Net	- 35.10
		09		

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
7.	Amjad Ali No.506	13.08.1981	12.02.2002	
	Name of Courses	Marks	Education	Marks
a.	Bomb disposal course	02	F.A	06.00
b.	Finger Print course	01	B-1	09.45
c.	Armourer/Heavy	02	Service	10.01.19 07.00
d.	Weapon course		DAR Period	01.06.02 01.50
e.	N.B.C course	01	Courses	07 11.00
f.	Bomb Reconnaissance	02	Total	34.95
			Punishment	- -
			Net	- 34.95
g.	Civil defence SPLT:last:casualty course	01		
h.	I.E.D course	02		
		11		

*Attested*

*M. Asif*  
District Police Officer  
(Karak)

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
8.	Waseef ullah No.838	27.02.1981		
	Name of Courses	Marks	Education	Marks
a.	Bomb Reconnance	02	B.A	08.00
b.	General protect againt explosive device	02	B-1	10.35
c.	Finger print course	01	Service	08.05.21 06.00
d.	Traffic course	03	FRP Period	01.50
e.	N.B.C course	01	Courses	05 9.00
		09	Total	34.85
			Punishment	-
			Net	34.85

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
9.	Hazrat ullah No.673	02.03.1985	10.11.2003	
	Name of Courses	Marks	Education	Marks
a.	Finger print course	01	B.A	08.00
b.	Traffic course	03	B-1	09.30
c.	C.D SPLT.instructor wardon course	01	Service	08.05.21 06.00
d.	Fire prevention course	01	FRP Period	01.50
e.	C.D SPLT: casualty course	01	Courses	07 10.00
			Total	34.80
f.	Leading Fire Man	01	Punishment	-
			Net	34.80
g.	Bomb Reconnance	02		
		10		

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
10.	Faiz Ahmad No.505	25.07.1981	12.02.2002	
	Name of Courses	Marks	Education	Marks
a.	Taik wando course	03	10 <sup>th</sup>	04.00
b.	Traffic course	03	B-1	11.15
c.	Fire prevention course	01	Service	10.02.09 07.00
d.	Fire Man course	01	D.A.R Period	01.06.02 01.50
e.	Bomb Reconnance	02	Courses	06 11.00
			Total	34.65
f.	Civil defence disaster management course	01	Punishment	-
			Net	34.65
		11		


*Attested*  
*Waseef*  
 District Police Officer  
 (Karak)



S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
11.	Abdul jabbar No.751	06.06.1979	11.07.2002	
	Name of Courses	Marks	Education	Marks
a.	Drill Instructor course	06	10 <sup>th</sup>	04.00
b.	Fire Man course	01	B-1	07.80
c.	Finger print course	01	Service	09.09.20 07.00
d.	Traffic course	03	FRP Period	01.50
e.	Bomb Reconssaince	02	Courses	07 15.00
f.	Civil Defence SPLT: Instructor Rescue course	01	Total	35.30
			Punishment	01 01.00
			Net	34.30
g.	Fire prevention & safety officer course	01		
		15		

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
12.	Farman ullah No.68/EF	20.02.1982	12.02.2012	
	Name of Courses	Marks	Education	Marks
a.	Bomb Reconssaince	02	10 <sup>th</sup>	04.00
b.	Finger print course	01	B-1	09.55
c.	Elite course	04	Service	10.01.19 07.00
d.	Traffic course	03	DAR Period	03.03.03 01.50
e.	I.E.D technique course	02	Courses	07 14.00
f.	Bomb Disposal course	02	Total	36.05
			Punishment	02 02.00
			Net	34.05
g.	Anti Terrorism and sabotage Training(12-days)	0		
		14		

S.NO.	Name of Constable	Date of Birth	Date of Enlistment	
13.	Ghani -ur- Rehman N0.513	15.01.1983	25.10.2004	
	Name of Courses	Marks	Education	Marks
a.	Bomb Disposal course	02	F.A	06.00
b.	Bomb Reconssaince	02	B-1	09.55
c.	Finger print course	01	Service	07.06.06 06.00
d.	B.D Defusing course	02	FRP Period	01.50
e.	Armourer/Weapon course	02	Courses	06 11.00
f.	Weapon courseS	02	Total	34.05
			Punishment	01 01.00
			Net	33.05
		11		

Attested  
  
 District Police Officer  
 (Karak)

  
 SRC  
 DPO KARAK