

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

Service Appeal No. 54 of 2018

*Qazi Ali Murad* ... .. *appellant*

**VERSUS**

*Inspector General of Police Khyber Pakhtunkhwa  
Peshawar and others*

... .. *Respondents*

**Index**

S.No.	Description of documents	Annexure	Pages
1.	Memo of service appeal		1-8
2.	Affidavit		9
3.	Addresses of the parties		10
4.	Copy of CNIC	"A"	11
5.	Copy of impugned order dated 31/10/2017	"B"	12- 12/A
6.	Copy of departmental appeal and order	"C&D"	13-18
8.	Copy of letter No.6502-50/17 and Office Order No.263/AS	"E&F"	19-22
9.	Copy of Office letter No.6988/E & other documents	"G"	23-35
<del>10.</del>	<del>Power of Attorney</del>		
10.	Wakalat Nama	In original	

Dated 07/01/2018

*Qazi Ali Murad*

Appellant

Through

*Syed Dawran Shah*

Advocate,

High Court Peshawar

Cell # 0300-5985384

Off: FF-28, 5<sup>th</sup> Floor Bilour Plaza Peshawar Cantt

(1)

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

Service Appeal No. 54 of 2018

Qazi Ali Murad S/o Ajaib Khan R/o Sarghoz PO  
Mastooj, Tehsil Mastooj, District Chitral.

... .. Appellant Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 40

Dated 15-1-2018

**VERSUS**

- 1- Inspector General of Police Khyber Pakhtunkhwa Peshawar.
- 2- Addl: Inspector General of Police (HQrs) Khyber Pakhtunkhwa Peshawar.
- 3- Deputy Inspector General of Police (HQrs) Khyber Pakhtunkhwa Peshawar.
- 4- Registrar CPO, to Inspector General of Police, Khyber Pakhtunkhwa Peshawar.

... .. Respondents

**APPEAL UNDER SECTION 4 OF KPK SERVICE  
TRIBUNAL ACT 1974 AGAINST IMPUGNED  
ORDER NO.6597-6610/E-5 DATED 31/10/2017  
WHEREBY THE PROMOTION OF THE  
APPELLANT DEFERRED DUE TO INCOMPLETE  
ACR FOR THE PERIOD FROM 25/06/2013 TO  
31/12/2013 AND THE DEPARTMENTAL APPEAL  
OF THE APPELLANT WAS NOT CONSIDERED.**

Filed to day

Registrar 15/1/18

**Prayer**

On acceptance of this service appeal, it is humbly prayed that the impugned order dated 31/10/2017 of deferring the promotion of appellant may kindly be set aside/modified and the respondents may be directed to consider ante-dated promotion to the appellant from the date when other employees of the department were promoted in the DPC held

on 18/10/2017 with all consequential back benefits.

Any other relief which deem fit and proper and not specifically asked in the circumstance and is available to the appellant may also be granted.

Respectfully Sheweth:

The appellant submits as under:

- 1- That the appellant is bona-fide Resident of District Chitral and is working as Senior Clerk in Police Department. (Copy of CNIC is annexed as Annexure "A").
- 2- That the appellant was appointed as Junior Clerk on 14/09/1987 and promoted to the rank of Senior Clerk on 16/11/1998.
- 3- That for the last 19 years appellant is working on the same post in spite of the fact that several DPCs held but petitioner was not considered for promotion and deferred on many occasions on one pretext or the others.
- 4- That in the recent departmental promotion committee meeting held on 18/10/2017 the promotion of the appellant once again deferred for the reason of incomplete ACR for the period from 25/06/2013 to 31/12/2013. Moreover, appellant withdraw his writ petition after the

3

communication of final order. (Copy of impugned order dated 31/10/2017 is annexed as Annexure "B").

- 5- That appellant filed departmental representation to the worthy Provincial Police Officer against the said deferment order dated 31/10/2017 but the departmental appeal was not accepted and appellant was not considered for promotion. (Copy of Departmental appeal and order are annexed as Annexure "C&D").
- 6- That feeling aggrieved from the impugned order and not considering and accepting the departmental appeal of the appellant, appellant is filing the instant appeal on the following grounds amongst others:

**GROUND:**

A) That the act, action and omission of the respondents by not promoting and deferring the appellant is illegal, unlawful, discriminatory, malafide against the law, rules, instruction, policy and facts of the case, without jurisdiction and lawful authority and of no legal effect, hence the impugned order is not sustainable in the eye of law and is liable to be set aside.

(4)

B) That in office order No.6502-50/17 dated 06/10/2017 issued from the office of Inspector General of Police Khyber Pakhtunkhwa Peshawar addressed to all concerned quarter on the subject of incomplete ACRs of Ministerial Staff and they were asked to submit the incomplete ACRs of employees mentioned in the said Office Order within a week positively for the purpose of promotion cases; in the said Office order appellant was at Serial No.5 which order showed the missing ACRs of the appellant for the period from 01/01/2016 to 31/12/2016. It is pertinent to mention here that the ACRs of that period was already submitted to the Provincial Police Officer Khyber Pakhtunkhwa vide Office Order No.263/AS dated 05/10/2017 from the Office of Regional Police Officer Malakanad at Saidu Sharif Swat but surprisingly respondent deferred the appellant by mentioning the period from 25/06/2013 to 31/12/2013, hence the order dated 31/10/2017 is against the fact of the case and is liable to be set at naught. (Copy of Office order are annexed as Annexure "E&F" respectively).

C) That in letter No.6502-50 /17 dated 06/10/2017 the only incomplete ACR was from 01/01/2016 to 31/12/2016 and the same was already

5

submitted to Provincial Police Officer but the Departmental Promotion Committee deferred the promotion of the appellant for a period of incomplete ACR which has never been shown incomplete in the order dated 06/10/2017.

D) That the period of ACR from 25/06/2013 to 31/12/2013 which is shown as the only reason of the deferment of the appellant was sent to the DIG of Police Zhob Range Loralie for counter signature in connection of the promotion case of the appellant and the ACR of that period is submitted to CPO vide regional office Letter No.318/AS on 27/10/2017. (Copy of the letter is annexed as Annexure "G").

E) That in spite of the fact that the ACR shown incomplete in order dated 31/10/2017 was submitted on 27/10/2017 ~~but~~ the impugned order was issued and the departmental appeal was also not accepted which act of the respondents amounts to discrimination and injustice.

F) That another instance of injustice and discrimination was that other employees whose ACRs were also incomplete and they were also junior to the appellant were conditionally

6

*promoted subject to the provision of good ACRs and appellant was also entitled to be treated in the same way keeping view the principles of legitimate expectancy, similarity, equality and equal protection of law as provided in the constitution of Islamic Republic of Pakistan 1973 and Khyber Pakhtunkwa Civil Servant Act 1973.*

*G) That the promotion case of the appellant is pending since long and most junior persons to the appellant was promoted and appellant was repeatedly ignored and not considered for promotion.*

*H) That appellant is/was eligible for promotion and possessed all requisite qualification and experience, having good service record and also senior employee of the department, having legitimate expectancy of promotion being deprived of promotion without any legal and genuine cause and the appellant suffered a lot for want of non completion of ACRs which reason was beyond his control.*

I) That the act of writing, controlling, countersigning and forwarding of ACRs is obligation and responsibility of Supervisory Officers.

J) That appellant was entitled to be considered for promotion when his case was considered in the previous DPC meetings and the promotion of the appellant was due when the employees most junior to appellant were promoted but the appellant was discriminated and other employees who were juniors to appellant were promoted and the appellant was not considered and deprived from promotion without any legal and cogent reasons and now the appellant is at the verge of retirement and is going to be retired in January 2019, hence the act and omission of respondents does not advance the object of achieving good governance and is against the principles of natural justice.



K) That any other grounds will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of this service appeal, it is humbly prayed that the impugned order dated 31/10/2017 of deferring the promotion of appellant may kindly be set aside/modified and the respondents may be directed to consider ante-dated promotion to the appellant from the date when other employees of the department were promoted in the DPC held on 18/10/2017 with all consequential back benefits.

Any other relief which deem fit and proper and not specifically asked in the circumstance and is available to the appellant may also be granted.

Dated 07/01/2018

*Dali Muneer*  
Appellant

Through

*Syed Dawran Shah*  
Advocate,  
High Court Peshawar

**Certificate**

Certified that no such like appeal has earlier been filed before this Hon'ble Tribunal.

Advocate

*Syed Dawran Shah*

9

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

Service Appeal No. \_\_\_\_\_ of 2018

*Qazi Ali Murad* ..... *appellant*

**VERSUS**

*Inspector General of Police Khyber Pakhtunkhwa  
Peshawar and others*

..... *Respondents*

**AFFIDAVIT**

I, *Qazi Ali Murad S/o Ajaib Khan R/o Sarghoz PO Mastooj, Tehsil Mastooj, District Chitral* do hereby solemnly affirm and declare on oath that the contents of the accompanied Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*Qali murad* \_\_\_\_\_

**DEPONENT**

**CNIC # 15202-9832699-7**

Identified by

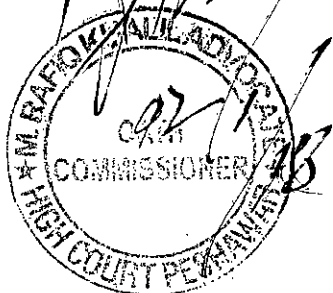
*Syed Dawran Shah*

**Syed Dawran Shah**

**Advocate**

**High Court, Peshawar**

**ATTESTED**



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

Service Appeal No. \_\_\_\_\_ of 2018

Qazi Ali Murad ..... appellant

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa  
Peshawar and others

..... Respondents

**ADDRESSES OF THE PARTIES**

***Appellant***

Qazi Ali Murad S/o Ajaib Khan R/o Sarghoz PO  
Mastooj, Tehsil Mastooj, District Chitral.

***Respondents***

- 1- Inspector General of Police Khyber Pakhtunkhwa  
Peshawar.
- 2- Addl: Inspector General of Police (HQrs) Khyber  
Pakhtunkhwa Peshawar.
- 3- Deputy Inspector General of Police (HQrs) Khyber  
Pakhtunkhwa Peshawar.
- 4- Registrar CPO, to Inspector General of Police,  
Khyber Pakhtunkhwa Peshawar.

Dated 07/01/2018



Appellant

Through



Syed Dawran Shah  
Advocate,  
High Court Peshawar



حکومت پاکستان  
 قومی شناختی کارڈ  
 15202-9832699-7  
 نام: امیر علی پروان خان شاد  
 تاریخ پیدائش: 15/01/1959  
 امین پور ایسٹ



دستخط کارڈ

دستخط رجسٹریشن

Annexure "A"



UM1319 15202-9832699-7  
 نام: امیر علی پروان خان شاد  
 تاریخ پیدائش: 07/05/2024  
 تاریخ رجسٹریشن: 07/05/2014  
 رجسٹریشن نمبر: 10359100474



*Affirmed*  
  
 Syed Dawran Shah  
 Advocate High Court Peshawar  
 M.A. . L.L.B



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE  
PESHAWAR  
Ph: 091-9210545 Fax: 091-9210927  
E-Mail: - OSEstobV@gmail.com

No. ~~6597-6610~~ E-V

Dated, Peshawar the 31/10 Oct, 2017

**ORDER:-**

In pursuance of the approved Minutes of the Departmental Selection Committee Meeting held on 18.10.2017 the following Senior Clerks (DPS-J4) are deferred due to their Incomplete ACRs for the period as noted against their names:-

S. No	Name	Place of Posting	Remarks
1.	Muhammad Iqbal	Inv: Wing Karak	Deferred due to Incomplete ACR for the period from 01.01.2015 to 31.12.2015
2.	Akbar Ali	DPO office Swat	Deferred due to Incomplete ACR for the period from 03.07.2013 to 31.12.2013
3.	Halbat Khan	Inv: Wing Lakki Marwat	Deferred due to Incomplete ACR for the period from 01.09.2012 to 31.12.2012, 07.03.2013 to 31.12.2013 & for the year 2014, 2015 & 2016.
4.	All Murad	DPO office Shangla	Deferred due to Incomplete ACR for the period from 25.06.2013 to 31.12.2013
5.	Muhammad Rizaz	CCP Office Peshawar	Deferred due to Incomplete ACR for the year 2013, 2015 & 2016
6.	Muhammad Zahid	DPO office Mansehra	Deferred due to Incomplete ACR for the period from 2012, 2013, 01.01.2014 to 18.11.2014 & for the year 2015 & 2016.
7.	Shah Farooq	FRP/Kohat Range	Deferred due to Incomplete ACR for the years of 2015 & 2016.
8.	Waheed-Ur-Rehman	RPO office Abbottabad	Deferred due to Incomplete ACR for the period from 01.01.2016 to 31.03.2016

EC

For M. A. Khan

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

*Asst. Secy*  
*[Signature]*  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B.

*[Signature]*  
31/10/17

Endst: No. and dated even.

Copy forwarded to the:-

- Addl: Inspectors General of Police: HQrs Khyber Pakhtunkhwa.
- Commandant, Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspectors General of Police: HQrs, CPO Peshawar.
- Regional Police officer Abbottabad.
- Capital City Police Officer, Peshawar.
- PA to Assistant Inspectors General of Police: Estt: CPO Peshawar.
- District Police Officers, Mansehra, Swat & Shangla.
- PSO to Inspector General of Police Khyber Pakhtunkhwa Peshawar.
- SP/FRP Kohat Range.
- SP/Investigation Wing Karak & Lakki Marwat.
- Registrar, CPO, Peshawar.
- Office Supdt: Secret CPO, Peshawar.
- Office Supdt: Career Planning Branch CPO, Peshawar.
- Incharge Central Registry Cell.

*(ARIF SHAHBAZ KHAN) PSP*  
 ATG/Establishment,  
 For Inspector General of Police,  
 Khyber Pakhtunkhwa,  
 Peshawar.

25/10/19

*Ahmed*  
*(Signature)*  
 Syed Dawran Shah  
 Advocate High Court Peshawar  
 M.A., LL.B

From The District Police Officer,  
Shangla

To The Regional Police Officer,  
Malakand, Saidu Sharif, Swat

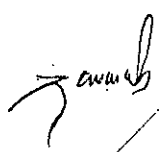
No 7534 /E, Dated Alpuri the, 21 / 11 2017

Subject: **DEPARTMENTAL APPEAL/REPRESENTATION AGAINST  
THE IMPUGNED ORDER NO. 6597-6610/E-5 DATED 31.10.2017**


Memo:

Enclosed please find herewith a Departmental Appeal/Representation in respect of Qazi Ali Murad Khan Senior Clerk of this Office containing 04 Pages along with relevant papers (09 Pages) which relates to the on subject matter is submitted for kind perusal and onward submission to Worthy Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar for consideration, please.

Encl: (13)

  
District Police Officer,  
Shangla

Attested

  
**Syed Dawran Shah**  
Advocate High Court Peshawar  
M.A. . L.L.B

To

The Most Respected  
Provincial Police Officer,  
KPK, Peshawar.

Through:

*P60 per channel*

Subject:-

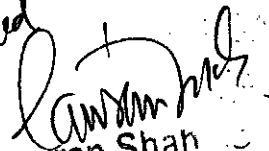
DEPARTMENTAL APPEAL/REPRESENTATION AGAINST  
THE IMPUGNED ORDER NO 6597-6610/E-5 DATED  
31/10/2017, WHEREBY MY PROMOTION CASE WAS  
DEFERRED DUE TO INCOMPLETE ACRS FOR THE  
PERIOD FROM 25/06/2013 TO 31/12/2013.

Sir,

*I have the honor to submit the following for favour of your  
kind and sympathetic consideration please,*

1. *That I have been appointed as Junior Clerk on 14/09/1987  
and promoted to the Rank of Senior Clerk on 16/11/1998.*
2. *That a Departmental Selection/Promotion Committee Meeting  
was held on 18/10/2017 on the subject of promotion of  
ministerial staff and my promotion was also due, but my  
promotion case was deferred due to incomplete ACRs for the  
period from 25/06/2013 to 31/12/2013. (Copy of Office Order  
dated 6597-6610/E-V dated 31/10/2017 is attached).*
3. *That on dated 06/10/2017 an Office Order No 6502-50/17  
issued from the Office of Worthy Inspector General of Police  
KPK, Peshawar, addressed to all concerned quarters on the  
subject of incomplete ACRS of ministerial staff and they were  
asked to submit the said incomplete ACRs within a week*


*for the record*

*Attested*  
  
**Syed Dawran Shah**  
Advocate High Court Peshawar  
M.A. LL.B



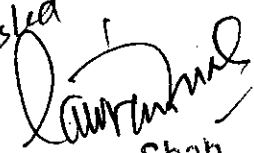
positively for the purpose of promotion cases and I was at serial No 05 in the said Order/List of employees whose ACRs were not submitted. (Copy of order is attached).

4. That it is pertinent to mention here that the said list/order shows my incomplete ACRs for the period from 01/01/2016 to 31/12/2016, but the ACRs of that period was already submitted to the Provincial Police Officer KPK, Peshawar vide Office Letter No 263/AS dated 05/10/2017 issued from the Office of Regional Police Office Malakand at Saidu Sharif Swat. (Copy of order is attached).
5. That in letter/order No 6502-50/17 dated 06/10/2017, my only incomplete ACRs was mentioned from 01/01/2016 to 31/12/2016 as mentioned above, which was already submitted to the Provincial Police Officer, but the Departmental Selection/Promotion Committee deferred my promotion case for a period of incomplete ACRs from 25/06/2013 to 31/12/2013, which period has never been shown as deficiency in the order dated 06/10/2017.
6. That the period of missing ACRs from 25/06/2013 to 31/12/2013 was sent to the DIG of Police Zhob Range Loralai for counter signature in connection of my promotion case and the same is submitted to CPO vide Regional Office Letter No 318/AS dated 27/10/2017. (Copies attached).

Attested  
  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A. LL.B



7. That the act of writing, reporting, controlling, countersigning and forwarding the ACRs is the obligation and responsibility of High-ups/Supervisory Officers and inspite of this fact that my ACRs were complete upto 27/10/2017, I was not promoted and the impugned order was issued on 31/10/2017 without any legal and cogent reason.
8. That I have been discriminated in this regard because there are other employees whose ACRs were also incomplete and they were also junior to me, but they were conditionally promoted subject to the provision of good ACRs and I was also entitled to the same treatment, keeping in view the principles of legitimate expectancy, similarity, equality and equal protection of law as provided in the Constitution of Islamic Republic of Pakistan, 1973, but I was not considered.
9. That my promotion case is pending since long but I have been repeatedly ignored and not considered for promotion on the same reason and I have been deferred so many times and suffered a lot on the provision of incomplete ACRs which is not a legal and genuine reason.
10. That I am eligible and possessed all requisite qualification and experience, having good service record and a senior employee of the department, having legitimate expectancy of promotion being deprived of promotion without any fault and on the simple reason of incomplete ACRs which reason does

Attested  
  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B.

not advanced the object of achieving good governance and which is against the law, rules, instructions and policy on the subject.

11. That I am lawfully and legally entitled to be promoted to the post of Assistant Grade Clerk from the day my promotion became due in the circumstances of the matter, hence pray for the same.

It is, therefore, respectfully prayed that on acceptance of this Departmental Appeal the impugned order No 6597-6610/E-V dated 31/10/2017 may very kindly be set aside/may be reviewed and I may very kindly be promoted to the Rank of Assistant Grad Clerk with all consequential benefits.

Dated:- 15/11/2017

Your Most Obedient Servant

*Q. Ali Murad Khan*

Qazi Ali Murad Khan  
Senior Clerk  
DPO Office, District Shangla  
Cell No:- 0345-5429040

15/11/2017

*Attested*

*Syed Dawran Shah*  
Syed Dawran Shah  
Advocate High Court Peshawa  
M.A., LL.B

18

Annexure "D"



21/E  
02-01-18  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA

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

No. 879 /CPB, dated Peshawar the 27/12/2017

To: The Regional Police Officer,  
Malakand Region, Swat.

Subject: DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE IMPUGNED  
ORDER NO. 6597-6610/E-V, DATED 31.10.2017

Memo:- Please refer to your office Memo: No. 13981/E, dated 06.12.2017 on the subject  
noted above.

The promotion case of Qazi Ali Murad Senior Clerk was discussed in the  
Departmental Promotion Committee meeting held on 18.10.2017 and deferred from promotion due to  
incomplete ACR for the period from 26.06.2013 to 31.12.2013. His promotion case will be considered in  
the next Departmental Promotion Committee meeting.

*[Signature]*  
(ZIA ALI SHAH)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

*[Signature]*  
No. 28 / 10  
dt. 02-01-2018

EC

for no action to  
inform the concerned.

EC/DPO Shangla  
for information and  
action please

*[Signature]*  
Regional Police Officer,  
Shangla  
02/01/2018

*[Signature]*  
Office Supt.  
For: Regional Police Officer,  
Malakand Region, Swat

*[Signature]*  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B.



Ali Murad Shaughan

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

No. SI/6502-50 J17, Dated Peshawar the 06/10/2007.

- To:
1. All Addl: IGP in Khyber Pakhtunkhwa
  2. All Commandants in Khyber Pakhtunkhwa.
  3. The Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
  3. The CCPO, Peshawar.
  4. All D.Is.G of Police in Khyber Pakhtunkhwa.
  5. All D.P.Os in Khyber Pakhtunkhwa.
  6. The Director,  
ACE, Khyber Pakhtunkhwa, Peshawar.

Subject:-

MISSING ACRs.

Memo:

The ACRs of following Ministerial Staff for the period mentioned against each are urgently required in connection with their promotion cases. The same ACRs may be provided to the CPO within week positively:-

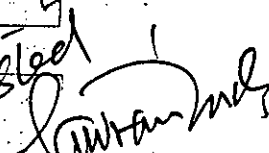
Senior Clerks

S. No.	Names	Missing Period
1.	Muhammad Iqbal	01.01.2015 to 31.12.2015 16.06.2016 to 31.12.2016
2.	Akbar Ali	01.01.2012 to 17.06.2012 03.07.2013 to 31.12.2013 01.01.2016 to 31.12.2016
3.	Haibat Khan	01.09.2012 to 31.12.2012 07.03.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
4.	Muhammad Yousaf	01.01.2016 to 31.03.2016
5.	Ali Murad	01.01.2016 to 31.12.2016
6.	Muhammad Riaz	01.01.2013 to 31.12.2013 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
7.	Muhammad Jamshid	01.01.2016 to 31.12.2016
8.	Muhammad Zahid	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 18.11.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
9.	Shah Farooq	01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
10.	Inamullah	01.01.2016 to 31.12.2016
11.	Muqarrab Alam Khan	07.03.2015 to 31.08.2015
12.	Abdur Rauf	01.01.2012 to 31.12.2012
13.	Riaz Muhammad	01.01.2016 to 31.12.2016
14.	Waheed ur Rehman	01.01.2016 to 31.03.2016
15.	Naseer Ahmad	01.08.2015 to 31.12.2015 01.01.2016 to 31.12.2016

Attested  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B.

16.	Haq Nawaz	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
17.	Muhammad Aslam	07.03.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
18.	Dildar Hussain	01.01.2016 to 14.07.2016
19.	Muhammad Fahim	01.01.2016 to 31.12.2016
20.	Amjad	01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
21.	Muhammad Ishtiaq	01.01.2012 to 31.12.2012 01.01.2014 to 06.08.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
22.	Sardar Alam	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
23.	Sikandar Khan	01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
24.	Zahidullah	01.01.2016 to 31.12.2016
25.	Muhammad Riaz	01.01.2016 to 31.12.2016
26.	Inayatullah	01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
27.	Sibghatullah	01.01.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 02.04.2016
28.	Alamzeb	01.01.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
29.	Muhammad Bashir	26.06.2013 to 31.12.2013 01.01.2014 to 31.12.2014 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
30.	Muhammad Irshad	01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
31.	Farmanullah	01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
32.	Hayat Ullah	01.01.2012 to 31.12.2012 01.04.2016 to 31.12.2016
33.	Muhammad Azhar	01.01.2016 to 31.12.2016
34.	Rehmat Ullah	01.01.2014 to 23.04.2014
35.	Abdul Wadood	01.01.2013 to 31.12.2013 01.01.2016 to 31.12.2016

Stenotypists

Attested  
  
**Syed Dawran Shah**  
 Advocate High Court Peshawar  
 M.A., LL.B.

NAL POLICE OFFICER, MALAKAND  
IN CHARGE SWAT

1.	Abdul Hamid	01.08.2013 to 31.12.2013 01.01.2016 to 31.12.2016
2.	Kiramandah	01.01.2016 to 31.12.2016
3.	Shams-ur-Rahman	01.01.2016 to 31.12.2016



N.S.P.....3

(3)

4.	Zafar Ali	01.01.2016 to 31.12.2016
5.	Ahmad Khan Stenotypist	06.06.2012 to 31.12.2012 01.01.2013 to 31.12.2013 01.01.2015 to 31.12.2015 01.01.2016 to 31.12.2016
6.	Bacha Jehan Stenotypist	01.01.2016 to 31.12.2016
7.	Amir Khan Stenotypist	01.01.2014 to 14.09.2014 01.01.2016 to 31.12.2016

*(Signature)*  
 (SYED ZIA ALI SHAH)  
 Registrar,  
 For Inspector General of Police,  
 Khyber Pakhtunkhwa, Peshawar.

Encls: No. & date even.

Copy of above is forwarded for information to the:-

1. PSO to IGP:Khyber Pakhtunkhwa, Peshawar.
2. Registrar. CPO, Peshawar.
3. Office Supdt: E-II, CPO.
4. PA to Addl: IGP/HQrs: CPO.
5. PA to DIG:HQrs: CPO.
6. PA to AIG: Establishment CPO.
7. PA to AIG: Legal, CPO.

*Attested*  
*(Signature)*  
 Syed Dawran Shah  
 Advocate High Court Peshawar  
 M.A., L.L.B.

Annexure "F" (22)

Annexure "F" (99)



OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND  
AT SAIDU SHARIF SWAT.  
Ph: 0946-9240381-83 & Fax No. 0946-9240390  
mdall@malakand@vsnl.com

No. 263 /AS, dated Saidu Sharif the 5 / 10 / 2017

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

Subject: ANNUAL CONFIDENTIAL REPORTS.

Memorandum:

Kindly refer to CPO Peshawar memo No. S/5905-45/17, dat  
21/09/2017, No. 792/CPB, dated 13/09/2017 and this office memo No. 257//  
dated 02/10/2017.

Annual Confidential Reports in duplicate of the follow  
Ministerial Staff of this Region for the period noted against each their name  
submitted herewith duly countersigned for further necessary action please:-

- |                                    |                          |
|------------------------------------|--------------------------|
| 1. SC Akbar Ali (one step promote) | 01/01/2016 to 31/12/2016 |
| 2. SC Qazi Ali Mirad               | 01/01/2016 to 31/12/2016 |
| 3. SC Muhammad Iqbal               | 16/06/2016 to 31/12/2016 |

*[Signature]*  
Regional Police Officer,  
Malakand, at Saidu Sharif, Swat

*[Signature]*  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., LL.B



(23)

Annexure "G"

SHANGLA DISTRICT

POLICE DEPARTMENT

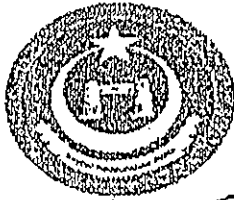
TO WHOM IT MAY CONCERNED

It is certified that on confirmation from Regional Police Officer, Office Saidu Sharif Swat today on 31.10.2017 at 15:15 hrs in connection with the ACR of Senior Clerk *Asst* Qazi Ali Murad Khan of this District who has been deferred for the incomplete ACR 25.06.2013 to 31.12.2013 vide CPO Order No.6597-6610/E-4, dated 31.10.2017 which conformed by the concerned ACR Clerk as well as office Superintendent that the ACR under aforementioned period have been submitted to CPO vide Region Office Letter No.318/AS, dated 27.10.2017., please.

No. 6988 /E,  
Dated 31/10/2017

*[Signature]*  
District Police Office  
District Police Office  
SHANGLA

*Attested*  
*[Signature]*  
Syed Dawran Shah  
Advocate High Court Peshawa  
M.A., L.L.B



OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND

AT SAIDU SHARIF SWAT

Ph: 0946-9240381-83 & Fax No: 0946-9240390

Email: [djamalakand@yahoo.com](mailto:djamalakand@yahoo.com)

immediate

091-9211457

59210227

No. 256 /AS, dated Saidu Sharif the 2 / 10 / 2017

To : Mr. Abdullah Khan,  
Deputy Inspector General  
Of Police Zhob Range at Loralai.

Subject: ANNUAL CONFIDENTIAL REPORTS.

Memorandum:

Annual Confidential Reports in "Duplicate" of the following Ministerial Staff of this Region for the period noted against each are sent herewith for countersignature in the capacity of Deputy Inspector General of Police, Malakand Region as the same are required in connection with his promotion case and return please:-

- 1. SC Akbar Ali
- 2. SC Qazi Ali Murad

24/06/2013 to 31/12/2013

25/06/2013 to 31/12/2013

No. 257 /AS,

Regional Police Officer,  
Malakand, at Saidu Sharif, Swat.

Copy to Provincial Police Officer, Khyber Pakhtunkhwa Peshawar for information with reference to CPO Peshawar memo: No. S/5905-45/17, dated 21/09/2017.

Regional Police Officer,  
Malakand, at Saidu Sharif Swat

Attested  
Syed Dawran Sharif  
Advocate High Court Peshawar  
M.A. LL.B.

From: The Regional Police Officer,  
Malakand at Saidu Sharif, Swat.  
To: The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

Registered

No. 7896 /E, dated Saidu Sharif, the 3/9/ 2013.

Subject: REPRESENTATION.

Memorandum:

It is submitted that representation of Senior Clerk Qazi Ali Murad Khan received from the District Police Officer, Shangla vide his Memo: No. 3391/E dated 21/08/2013 is submitted herewith for favour of necessary action, please.

Regional Police Officer,  
Malakand at Saidu Sharif, Swat.

36813

\*\*\*SAIF\*\*\*

8/13

F 20-13/013

Attested  
  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A. . L.L.B

17

(26)

From: The District Police Officer,  
Shangla.

To: The Regional Police Officer,  
Malakand, Saidu Sharif, Swat.

No: 13 /SB Dated Alpuri the, 09/01 /2014.

Subject: ANNUAL CONFIDENTIAL REPORT.

Memo:

Kindly refer to PPO KPK, Peshawar letter memo: No.6471-  
6518/13, dated 30.12.2013.

Enclosed please find herewith Annual Confidential Report for  
the period from 25.06.2013 to 31.12.2013 in-duplicate each in respect of  
Senior Clerk Qazi Ali Murad Khan working as PA in this District for further  
necessary action, Please.

Encl: (06)

District Police Officer,  
Shangla

*Approved*  
*Syed Dawran Shah*  
**Syed Dawran Shah**  
Advocate High Court Peshawa  
M.A. . L.L.B

**Syed Dawran Shah**  
Advocate High Court Peshawa  
M.A. . L.L.B

From: The District Police Officer  
Shangla

To : The Regional Police Officer  
Malakand, Saidu Sharif, Swat.

No. 1290 /E, dated Alpuri the 11/03 /2014

Subject: RE-PRESENTATION

Memo:

Kindly refer CPO, letter No. 29231/E-III, dated  
27.11.2013.

A <sup>re-</sup>presentation in respect of Senior Clerk, Qazi Ali Murad  
Khan presently performing duty as PA in the office of the undersigned is  
submitted for onward submission to the High-ups in earliest possible time being a  
genuine case as such the DPC will be held of the Assistant Grade Clerk during the  
month of March, 2014 please.

Encl: (a.a)

*[Signature]*  
District Police Officer  
Shangla

11/3/2014

To

*DCI Office Swat.*

No. 1290/E

*Sign*  
*[Signature]*  
Date: *12/13/2014*

*Dist*  
*[Signature]*

*Attested*  
*[Signature]*  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A. LL.B

Resu

From : **The Regional Police Officer,  
Malakand at Saidu Sharif, Swat.**

To : **The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.**

No. 2011 /E, dated Saidu Sharif, the 13-3- /2014.

Subject: **REPRESENTATION.**

Memorandum:

It is submitted that representation of Senior Clerk Qazi Ali Murad Khan received from the District Police Officer, Shangla vide his Memo: No. 1290/E dated 11/03/2014 is submitted herewith for favour of necessary action, please.

*E. ... (8)*

*Murad*  
**Regional Police Officer,  
Malakand at Saidu Sharif, Swat.**

*J* **\*\*SAIF\*\***

*slu*

*Attested*  
*Syed Dawran Shah*

**Syed Dawran Shah**  
Advocate High Court Peshawar  
M.A., L.L.B

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE PART-III  
ORDERS BY THE PROVINCIAL POLICE OFFICER KHYBER PAKHTUNKHWA, PESHAWAR

NOTIFICATION

No. 17547 /E-III, PROMOTION AS OFFG: ASSISTANT GRADE CLERK : BPS-14. Having been recommended by the DPC held on 05.07.2013, approved by Addl: IGP/HQrs, the following Senior Clerks are hereby promoted as Offg: Assistant Grade Clerk in (BPS-14) Rs. (8000-610-26300) with immediate effect.

Their promotion will take effect from the date they actually take over the charge of their higher responsibilities.

No. 17548 /E-III Transfer/postings: On promotion as Offg: Assistant Grade Clerk (BPS-14), their transfer posting detail given below are hereby ordered with immediate effect.

S.No	Name	D.O. Birth & DOMICILE	Present Posting	Remarks	Posted on Assistant Grade Clerk To
1.	Jehangir Khan	A. Abad 15.04.62	Hazara	Promoted conditionally subject to the provision of good ACRs for the following periods/years within 03 months:- 01.01.2009 to 22.09.2009 Year 2010 01.01.2011 to 31.04.2011 & Year 2012	Hazara Regio
2.	Said Kareem Jan	Charsadda 20.04.60	Charsadda	Promoted conditionally subject to the provision of good ACRs for the period from 01.01.2008 to 16.05.2008 within 03 months.	PQR Peshaw.
3.	Faridoon Khan	Abbottabad 15.02.1954	FRP Abbottabad	Promoted.	FRP Hazara
4.	Muhammad Shafique	Peshawar 01.10.65	SSP/Traffic Peshawar	Promoted conditionally subject to the provision of good ACR for the year 2012 within 03 months	CPO
5.	Farmanullah	Charsadda 01.06.64	Inv: CPO	Promoted conditionally subject to the provision of good ACR for the following period/year within 03 months:- Year 2008, 01.01.2009 to 05.10.2009, 01.01.2012 to 02.09.2012.	Addl: IGP/lt
6.	Zafaruddin	Peshawar 15.09.60	Spl: Branch	Promoted conditionally subject to the provision of good ACR for year 2012 within 03 months.	Spl: Branch
7.	Farhad Khan	Charsadda 23.05.58	FRP Peshawar	Promoted conditionally subject to the provision of good ACR for year 2008 & 2012 within 03 months.	Hazara Reg
8.	Akhtar Aurangzeb	Peshawar 23.05.58	CCP Peshawar	Promoted conditionally subject to the provision of good ACR for year 2012 within 03 months.	DCT/SE
9.	Taj Alam	Charsadda 13.06.59	Hazara	Promoted conditionally subject to the provision of good ACR for following period/year within 03 months:- 01.01.2008 to 06.04.2008, 01.01.2010 to 15.07.2010 & Year 2012	Hazara Re:
10.	Fazal Malik	Mardan 08.02.64	Mardan	Promoted.	Mardan Re
11.	Muhammad Riaz	Karak 04.05.67	Kohat	Promoted conditionally subject to the provision of good ACR for year 2008 within 03 months.	Bannu Re
12.	Abdul Qayum	Peshawar 17.06.64	SSP/Traffic	Promoted conditionally subject to the provision of good ACR for year 2012 within 03 months.	AIG/Tra
13.	Ali Man Shah	Peshawar 03.04.65	Spl: Branch	Promoted.	Hazara Re

*Attended*  
*Syed Dawran Shah*  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A. .LL.B

30

Name	D.O. Birth & DOMICILE	Present Posting	Remarks	Posted on promotion as Assistant Grade Clerk To
4. Muhammad Ishaq	D.I.Khan 15.02.69	DIKhan	Promoted conditionally subject to the provision of good ACR for year 2012 within 03 months.	DIKhan Region
15. Kifayat Hussain	D.I.Khan 15.01.67	DIKhan	Promoted conditionally subject to the provision of good ACR for the year 2012 within 03 months.	DIKhan Region
16. Nazar Hayat	Bannu 18.04.62	Bannu	Promoted conditionally subject to the provision of good ACR for the year 2012 within 03 months.	Bannu Region
17. Muhammad Jehangir Khan	Peshawar 28.09.66	CPO	Promoted.	CPO
18. Saeed Ahmad	Kohat 28.02.66	Kohat	Promoted conditionally subject to the provision of good ACR for the period from 01.01.2008 to 31.06.2008 within 03 months.	Hazara Region
19. Shakeel Ahmad	Abbottabad 04.01.68	Hazara Region	Promoted conditionally subject to the provision of good ACR for the year 2011 & 2012 within 03 months.	Hazara Region
20. Khan Faraz	Charsadda 04.04.70	Spl: Branch	Promoted.	Spl: Branch
21. Naseeruddin	Kohat 15.04.63	Kohat	Promoted conditionally subject to the provision of good ACR for the year 2009 within 03 months.	Bannu Region
22. Liaquatullah	D.I.Khan 20.04.69	DIKhan	Promoted conditionally subject to the provision of good ACR for the following period/ years within 03 months:- Year 2008 01.01.2010 to 20.05.2010 & Year 2012	Malakand Region
23. Ghafirullah	Nowshera 01.09.59	CPO	Promoted conditionally subject to the provision of good ACR for the year 2012 within 03 months.	CPO
24. Muhammad Tufail	Peshawar 20.04.68	CPO	Promoted conditionally subject to the provision of good ACR for the year 2012 within 03 months.	CPO
25. Muhammad Umar	DIKhan 30.01.69	DIKhan	Promoted conditionally subject to the provision of good ACR for the period from 01.01.2008 to 29.06.2008 within 03 months.	Malakand Region
26. Sher Muhammad	DIR 08.06.63	Malakand Region	Promoted conditionally subject to the provision of good ACR for the following period /year within 03 months:- 01.01.2009 to 13.05.2009 & Year 2012.	Malakand Region
27. Muhammad Akbar	Swat 01.01.63	Malakand Region	Promoted conditionally subject to the provision of good ACR for the following period/year within 03 months:- 01.01.2008 to 13.04.2008, 01.08.2011 to 31.12.2011 & Year 2012	Malakand Region
28. Abdullah Khan	Swabi 01.04.70	Swabi	Promoted conditionally subject to the provision of good ACR for the following period /year within 03 months:- 01.01.2008 to 19.04.2008 & Year 2012	Mardan
29. Habib Shah	Kohat 15.10.68	Kohat	Promoted.	Inv:
30. Muhammad Farooq -I	Swat 01.04.55	DPO Dir Lower Office	Promoted conditionally subject to the provision of good ACRs for the year 2008, 2009 & 2012 within 03 months.	Malakand Region
31. Ghulam Dali	Kohat 01.03.66	Kohat	Promoted.	DPO
32. Ubaid ur Rehman - III	Swabi 10.12.64	Swabi	Promoted conditionally subject to the provision of good ACRs for the following period/year within 03 months:- 01.01.2009 to 17.09.2009 & year 2012	Hazara Region

Attested  
Lawyer  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B



(31)

Name	D.O. Birth & DOMICILE	Present Posting	Remarks	Posted on promotion as Assistant Grade Clerk To
33. Ajmal Hussain	Kohat 04.06.64	Kohat	Promoted conditionally subject to the provision of good ACRs for the following period within 03 months:- 18.07.2008 to 31.12.2008 01.01.2009 to 12.05.2009	Hazara Region
34. Muhammad Farooq -II	Peshawar 01.01.66	Spl: Branch	Promoted conditionally subject to the provision of good ACRs for the year 2008 & 2009 within 03 months.	Spl: Branch
35. Khalid Parvaiz	Peshawar 02.02.64	CCP Peshawar	Promoted.	Tele
36. Zahid Khan	Peshawar 11.01.68	CPO	Promoted.	CPO (E-III 2 <sup>nd</sup> )
37. Abdul Aziz	Swat 10.08.1960	Malakand Region	Promoted conditionally subject to the provision of good ACRs for the following period/year within 03 months:- 01.01.2008 to 13.04.2008 17.07.2012 to 31.12.2012.	Malakand Reg
38. Ayub Khan	Swat 01.01.1966	Malakand Region	Promoted conditionally subject to the provision of good ACRs for the following period/year within 03 months:- 01.01.2009 to 31.10.2009 06.09.2012 to 31.12.2012.	Malakand Reg
39. Muhammad Sher	Peshawar 01.06.1965	PCU	Promoted.	PCU
40. Said ul Wahab	Nowshera 08.02.1966	CPO	Promoted.	CPO (E-I)

*Khalid Masood*  
(KHALID MASOOD)  
Addl: IGP/Headquarters  
For Provincial Police Officer,  
Khyber Pakhtunkhwa  
Peshawar.

No. 17549-62 E-III dated Peshawar the / /2013.

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

1. Addl: IGP/HQrs Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/Special Branch Khyber Pakhtunkhwa, Peshawar.
3. Addl: IGP/Investigation Khyber Pakhtunkhwa, Peshawar.
4. Addl: IGP/Commandant FRP Khyber Pakhtunkhwa, Peshawar.
5. Capital City Police Officer, Peshawar.
6. All Regional DisG in Khyber Pakhtunkhwa.
7. Deputy Inspector General of Police, DCT SB Khyber Pakhtunkhwa, Peshawar.
8. Deputy Inspector General of Police PCU.
9. AIG/Telecommunication Khyber Pakhtunkhwa, Peshawar.
10. Accountant General, Khyber Pakhtunkhwa Peshawar.
11. Registrar CPO, Peshawar.
12. DSP/PQR Khyber Pakhtunkhwa, Peshawar.
13. Office Supdt: Secret CPO, Peshawar.
14. Accountant CPO, Peshawar.

*Attested*  
*Ramran mal*  
**Syed Dawran Shah**  
Advocate High Court Peshawar  
M.A. . L.L.B

*6038-39/E, 24/3*  
*copy of above*  
*Department of Investigation*  
*Malakand*  
Regional Police Officer  
Malakand, at Saidi Shah

**Immediate**

Tele Phone No. 091-9211457  
Fax No. 091-9213165/9211927

From : The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

To : All Heads of Police Offices  
in Khyber Pakhtunkhwa.

No. S/5015-62/13; dated Peshawar, (11/01/10/2013)

Subject:- P.E.Rs/ACRs.

Memo:

The Police Chief has issued directions to all concerned for holding of DPC/DSC meeting within a week time for promotion in various categories, wherein the ACRs/PERs of the officers/officials have a vital role.

The promotion confirmation cases of Executive and Ministerial Staff of Police Department at CPO level are lying pending for want of their ACRs/PI Rs causing unnecessary delay.

Therefore, the W/PPO, Khyber Pakhtunkhwa has taken serious notice for not submitting/reporting the ACRs/PERs of subordinate officers/official in time by the reporting officers as well as countersigning officers.

All the reporting/countersigning officers are requested to make sure initiation/countersigning of the ACRs/PERs of all their subordinate officers/officials within a week time and provide a completion certificate in this regard.

*Pls  
in compliance  
[Signature]  
No. S/20412*

*[Signature]*

(TARIQ JAVED)  
DIG/HQrs:  
For Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.

No. S/20412/13.

Copy of above is forwarded to W/Provincial Police Officer, Khyber Pakhtunkhwa for information please.

*Attested*  
*[Signature]*  
**Syed Dawrah Shah**  
Advocate High Court Peshawar  
M.A. .LL.B

33

**Immediate**  
Tel. Phone No. 091-9210457  
Fax No. 091-9213165/9210927

From : The Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
To : All Heads of Police Offices  
in Khyber Pakhtunkhwa.  
No. S/6471-6518/13, dated Peshawar, the 30<sup>th</sup> /12/2013.  
Subject:- P.E.Rs/ACRs.  
Memo:



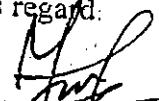
Please refer to this office Immediate memo: No. S/522-67/13, dated 23.01.2013 and No. S/5015-62/13, dated 01.10.2013 on the subject cited above.

The promotion/confirmation cases of Executive and Ministerial Staff of Police Department at CPO level are lying pending for want of their ACRs/PERs causing unnecessary delay.

The calendar year-2013 is also on the finishing point and the ACRs/PERs for the years prior to 2013 have not been completed by the concerned reporting/countersigning officers so far.


Therefore, the W/PPO, Khyber Pakhtunkhwa has taken serious notice for not submitting/reporting the ACRs/PERs of subordinate officers/officials in time by the reporting officers as well as countersigning officers.

All the reporting/countersigning officers are requested to make sure initiation/countersigning of the ACRs/PERs of all their subordinate officers/officials within a week time and provide a completion certificate in this regard.

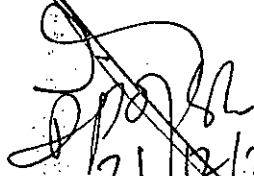
  
(MUBARAK ZEB)  
DIG/HQrs:  
For Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.

No. S/6519 /13,

Copy of above is forwarded to W/Provincial Police Officer, Khyber Pakhtunkhwa for information please.

Attested  
  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A. . L.L.B

PA + EC URGENT  
For immediate  
necessary action  
to put up the ACRs  
of all concerned.

  
31/12/2013

34

From : The Provincial Police Officer, **IMMEDIATE/FAX**  
NWFP, Peshawar.

To : All Deputy Inspectors General of Police,  
in NWFP.

All District Police Officers,  
in NWFP.

No. S/2419-49/08, dated Peshawar, the 22/3/2008.

Subject : **PROMOTIONS**


Memo :-

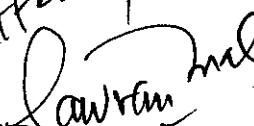
Promotion in all ranks should be expedited and finalized within 15 days.

Regional Deputy Inspectors General of Police shall personally issue a certificate to the effect that all processes of promotion in their respective Regions have been completed.

In case ACRs of the officers have not been completed, conditional promotion should be made. In case of an Adverse ACR the officer can be reverted, but the officers should not suffer on the pretext of incomplete ACRs which is not a fault on their part but is the responsibility of their supervisory Officers.

Laxity on this count will be viewed as in-efficiency on the part of the Responsible Officers.

  
(MALIK NAVEED KHAN)  
Provincial Police Officer,  
NWFP, Peshawar

*Attested*  
  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B.



**MOST IMMEDIATE****Government of Khyber Pakhtunkhwa****Establishment Department****(SECRET SECTION)****No.SOS(ED)CR.1/2(10)PER-Inst:, 2015****Dated Peshawar the February 26, 2015**

To

1. The Additional Chief Secretary, P&D Department Khyber Pakhtunkhwa.
2. The Additional Chief Secretary (FATA) FATA Sectt, Khyber Pakhtunkhwa.
3. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
4. The All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
5. The Secretary to Governor, Khyber Pakhtunkhwa.
6. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. The Provincial Police Officer, Khyber Pakhtunkhwa.
8. All Commissioners in Khyber Pakhtunkhwa.
9. All Heads of Attached Departments in Khyber Pakhtunkhwa.
10. All Deputy Commissioners in Khyber Pakhtunkhwa.
11. All Political Agents in Khyber Pakhtunkhwa.
12. All Heads of Autonomous/Semi-Autonomous Bodies in Khyber Pakhtunkhwa.
13. Secretary, Khyber Pakhtunkhwa, Public Service Commission Peshawar.
14. Registrar, Khyber Pakhtunkhwa, Services Tribunal Peshawar.

Subject: - **PROMPT AND TIMELY WRITING OF PERFORMANCE EVALUATION REPORTS (PERs) AND SUBMISSION OF COMPLETION CERTIFICATES.**

Dear Sir/Madam,

I am directed to refer to the previous instructions circulated by Establishment & Administration Department, Government of Khyber Pakhtunkhwa from time to time on the subject and to state that it has been observed with concern by the competent authority that generally the writing of Performance Evaluation Reports (PERs) gets delayed which adversely affects, inter alia, promotion, training, posting and transfer cases in which character rolls are to be consulted.

2. It may be noted that Para 1.0 and 1.4 of the Booklet "Instructions on Performance Evaluation Report" 2006, Govt. of Khyber Pakhtunkhwa prescribe as under:-

"The PERs are to be initiated by the Reporting Officer in the First week of January after end of each calendar year. The next higher authority shall give its remarks within one week. Thus reports are to be completed within the month of January each year. The final authority would furnish a certificate to the Establishment Department that all Performance Evaluation Reports, which were due to be completed, have actually been completed and placed on Character Rolls. This certificate should reach the Establishment Department (Secret Section) in the first week of February positively."

3. However, these instructions are not adhered to in letter and spirit which is a matter of concern and resultantly a large number of officers/officials suffer due to laxity of Reporting/Countersigning Officers and those who are in and responsible for prompt and timely completion of the process

*Attested*  
*Syeda Bawra Shah*  
 Syeda Bawra Shah  
 Advocate High Court Peshawar  
 M.A., L.L.B.

ECK

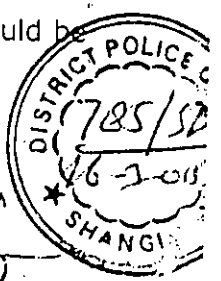
4. I am, therefore, further directed to request you to please ensure completion of PERs in respect of all officers/officials under administrative control for completion of record and a certificate in this behalf for the year 2014 may please be furnished by **30.04.2015**. In case of non-availability/missing position of Performance Evaluation Report (PERs) for the year 2014 during record review by this Department and those received after 30.04.2015, disciplinary proceedings shall be initiated against the administrative/controlling officers concerned under Khyber Pakhtunkhwa (Efficiency & Discipline) Rules, 2011.

5. You are further advised to strictly follow the above instructions/policy guidelines in letter and spirit on regular footing so that the system could be improved and complications/repercussions may be avoided in future.

Yours faithfully

(IRUM SHAHEEN)

Section Officer (Secret)



**ENDST: NO. & DATE EVEN.**

A copy is forwarded to the:

- 1. PS to Chief Secretary, Khyber Pakhtunkhwa.
- 2. PS to Secretary Establishment, Khyber Pakhtunkhwa.
- 3. PS to Special Secretary (Establishment), Establishment Department, Khyber Pakhtunkhwa.
- 4. PS to Additional Secretary (Establishment), Establishment Department, Khyber Pakhtunkhwa.

1/5/15

Mr PA 17/3/15

Section Officer (Secret)

For Compliance of  
directed

16/3/15




Attested  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A. L.L.B

9/4/15

6-3-15

2015

Rs. 50

			14-118
ایڈووکیٹ: <u>سید داوران شاہ انڈسٹریل</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
بار کونسل ایسوسی ایشن نمبر: <u>60210-7799</u>			
رابطہ نمبر: <u>03005985384</u>			

بعدالت جناب: حکیمہ خاتون خواہ سردار گل بیگم

منجانب: <u>ایڈووکیٹ</u>	دعویٰ: <u>اپیل</u>
<u>خاص علی سردار</u>	علت نمبر: _____
بنام	موردہ: _____
<u>انسٹیٹیوٹ جنرل آف بزنس کپک</u>	جرم: _____
<u>کراچی</u>	تھانہ: _____

**باعث تحریر آگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کیلئے سید داوران شاہ انڈسٹریل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق سرزریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کیلئے اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظرقامی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا، اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائے التوائے مقدمہ کے سب سے ہوگا، کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: سید داوران شاہ

078/02/2018  
PESHAWAR BAR ASSOCIATION  
KHYBER

مقام: \_\_\_\_\_  
تاریخ: \_\_\_\_\_  
کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

Accepted by  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., I.L.B.

BEFORE THE HONORABLE KPK SERVICE TRIBUNAL

PESHAWAR

Service Appeal No.54/2018

Qazi Ali Murad.....(Appellant)

Versus

Provincial Police Officer (IGP) KPK and others.....(Respondents)

Subject:- PARAWISE COMMENTS ON BEHALF OF  
RESPONDENTS ARE AS UNDER,

PRELIMINARY OBJECTIONS:-

1. That the appeal has not been on facts.
2. That the appellant has got no cause of action and locus standi to file the appeal.
3. That the appeal is not maintainable in the present form.
4. That the appeal is bad for miss-joinder and non-joinder of necessary parties.
5. That the appellant is estopped by his own conduct to file the appeal.
6. That the appeal is barred by law and limitation.
7. That the appellant has not come to this Honorable tribunal with clean hands.

FACTS:-

1. Correct that the appellant is working as Senior Clerk in Police Department and resident of District Chitral.
2. Pertains to record.
3. Correct to the extent that the appellant is working as Senior Clerk in Police Department since his promotion from Junior Clerk to a Senior Clerk, remaining portion of the para is in correct. Infact according to senior position his name was included in the DPC meeting held on 18.10.2017 for promotion to the post of Assistant Grade Clerk but the DPC recommended him to be deferred due to incomplete ACR for the period from 26.06.2013 to 31.12.2013.
4. Correct to the extent that the name of the appellant was included in the DPC held on 18.10.2017 for the promotion to the post of Assistant Grade Clerk, according to his seniority position but due to



incomplete ACRs for the period from 25.06.2013 to 31.12.2013 he was recommended to be deferred and his case will be discussed in the next DPC meeting.

5. Correct to the extent that the appellant filed Departmental Representation to the Competent Authority, which was not accepted, while his case will be discussed in the next DPC meeting.
6. The appellant has not come to this court with clean hand.

**GROUND:-**

- A. Incorrect. The case of the appellant was discussed in the DPC meeting held on 18.10.2017 but due to incomplete ACRs for the period from 25.06.2013 to 31.12.2013, he was deferred and his case will be discussed in the next DPC meeting. The decision of DPC was in accordance with law and rules, thus is sustainable.
- B. Correct to the extent that a letter No.6502-50/17 dated 06.10.2013 was issued from the office of respondent No. 01 to all concerned on the subject of incomplete ACRs of ministerial staff for the submission of incomplete ACRs of employees to the office within a week time for promotion cases. Even then the ACR of appellant was incomplete for the period 25.06.2013 to 31.12.2013 due to which the appellant was recommended to be deferred by the DPC and his case will be discussed in the next DPC.
- C. Correct to the extent that incomplete ACR of the appellant for the period from 1.1.2016 to 31.12.2016 was submitted and completed, but his ACR for the period from 25.06.2013 to 31.12.2013 was incomplete, due to which he was recommended to be deferred by the DPC in its meeting held on 18.10.2017.
- D. Incorrect. The ACR of the appellant for the period from 25.06.2013 to 31.12.2013 was incomplete due to which he was recommended to be deferred by the DPC.
- E. Incorrect. The impugned order was passed by the Authority in accordance with law and rules and in the light of recommendation made by the Departmental Promotion Committee.
- F. Incorrect. No officials with incomplete ACRs were promoted; however, some of the officials whose ACRs were issued by the reporting officer but were pending for counter signature, have been conditionally promoted subject to countersignature.

- G. Incorrect. The name of appellant was included in accordance with his seniority in the DPC meeting held on 18.10.2017, but was recommended to be deferred by the DPC due to his incomplete ACR.
- H. Incorrect. The case of appellant will be discussed in the next DPC meeting.
- I. Correct to the extent that writing, countersigning and forwarding of ACRs is the responsibility of supervisory officer but complete ACR is one of the basic requirements in promotions cases and the ACR of the appellant was incomplete due to which he was declared deferred by the DPC.
- J. Incorrect. The name of the appellant was included for promotion to the post of Assistant Grade Clerk in the DPC meeting held on 18.10.2017 according to his seniority but was recommended to be deferred by the DPC due to incomplete ACR for the period from 26.06.2013 to 31.12.2013. His case will be discussed in the next DPC meeting.
- K. The respondent may also be allowed to advance additional grounds at the time of hearing.

Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.  
(Respondents No.01)

Addl: Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa,  
Peshawar.  
(Respondents No.02)

Deputy Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa,  
Peshawar.  
(Respondents No.03)

Registrar CPO,  
Khyber Pakhtunkhwa,  
Peshawar.  
(Respondents No.04)

Before the Service Tribunal KPK  
Peshawar

Qazi Ali Murad

vs

IGP etc


Application for Adjournment in the above  
titled case

Respectfully Sheweth:

- I- That the above titled case is pending adjudication before this Honorable Tribunal for today
- II- That due to the fixation of a Case (Nos 44-3471) at the Circuit bench of High Court Abbotabad the Senior Advocate Syed Dawran Shah is unable to attend this Court as well as a termination case is also pending of the Appellant before the Tribunal fixed for 21/02/2021.

It is, therefore, most humbly prayed that the case titled above may kindly be adjourned till date <sup>i.e. 21/2/21</sup> of the termination case pending before the tribunal.

Dated: 10/11/2021

Appellant   
through  
Sheh'ud Hassan  
Advocate High Court  
Peshawar