


# FORM OF ORDER SHEET

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

Case No.- 1775/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/12/2022	<p>The appeal presented today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

APPEAL NO. 1775 /2022


**DAD MUHAMMAD**  
**VS**  
**GOVT. OF KP & OTHERS**

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**APPELLANT**

Through:

  
**MIR ZAMAN SAFI**  
Office: Room No. 6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, Hashtnagri,  
Peshawar.  
Cell: 0333-9991564

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

APPEAL NO. 775 /2022

Mr. Dad Muhammad, Chief Head Warder (BPS-11),  
Central Jail, Peshawar..... APPELLANT

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary Establishment Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 4- The Secretary Govt: of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
- 5- The Inspector General Prisons, Khyber Pakhtunkhwa, Peshawar.

..... RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR ENHANCEMENT OF 30% PROMOTION QUOTA ALLOCATED FOR THE CADRE OF APPELLANT IN THE IMPUGNED SERVICE RULES DATED 15.04.2022 WHILE FOR THE OTHER CADRES 75% QUOTA HAS BEEN RESERVED FOR PROMOTION TO THE NEXT HIGHER SCALE AND AGAINST THE 10% QUOTA ALLOCATED FOR PROMOTION OF SENIOR CLERKS IN THE APPELLANT'S CADRE AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the action and inaction of the respondents by not enhancing the promotion quota of the cadre of appellant and illegal and unlawful allocation of 10% quota for promotion of senior clerks to the post of Assistant Superintendant Jail (BPS16) mentioned in Serial No. 5, column No.6 of the impugned Service Rules Notified on 15.04.2022 may kindly be declared as Ultra Vires, illegal, unconstitutional and ineffective upon the rights of the appellant. That the respondents may kindly be directed to amend the impugned Service Rules by enhancing 30% quota of the appellant's cadre similarly to the other employees and 10% quota of the Senior Clerks be removed. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

**R/SHEWETH:**

**ONFACTS:**

- 1- That the appellant was appointed as Warder in the Prison Department on 25.06.1994. That after appointment the appellant started performing his duty quite efficiently and upto the entire satisfaction of his superiors. Copy of seniority list is attached as annexure ..... A.
- 2- That appellant since the date of appointment till date is serving the respondent department quite efficiently, whole heartedly and up to the entire satisfaction of his superiors and during the entire service the appellant has neither committed any illegality nor any complaint whatsoever been received to the high ups against the appellant.
- 3- That the respondent Department issued Notification dated 15-04-2022 whereby proper service structure for the employees of the respondent Department has been approved/ notified and according to the said service structure the employees serving on the strength of respondent No.5 i.e. I.G Prisons, Khyber Pakhtunkhwa, Peshawar have been categorized in different cadres for the purposes of seniority and their prospects of promotions.
- 4- That, in the above mentioned service rules/structure the posts of Assistant Superintendant Jail shown at Serial No.5 of the appendix has been given the method of promotion under Column No.6 which is as under:
  - (a) (Thirty percent by promotion, on the basis of seniority-cum-fitness from amongst the holders of the posts of Chief Head Warders, having Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years service as head Warder and Chief Head Warder, subject to:-
    - (i) Successful completion of promotion course prescribed for Assistant Superintendant Jail; and
    - (ii) Clearance of mandatory departmental examination prescribed for Assistant Superintendant Jail;
  - (b) Ten percent by promotion, on the basis of senior-cum fitness, from amongst the holders of the posts in service Senior Clerks, who possess minimum qualification or eligibility criteria prescribed for initial recruitment, with at least five years service as Junior Clerk and Senior Clerk, Subject to:-
    - (i) Successful completion of promotion course prescribed for Assistant Superintendant Jail; and
    - (ii) Clearance of mandatory departmental examination prescribed for Assistant Superintendant Jail". Copy of the Notification/Service Rules & letter for mandatory promotion course are attached as annexure .....B & C.
- 5- That according to the above mentioned service rules 30% quota for the cadre of the appellant i.e. Head Warder/Chief Head Warder has been allocated for promotion to the post of Assistant Superintendant Jail (BPS-16) while the other cadres have granted 75% quota for promotion to the next higher scale.

- 6- That it is pertinent to mention that the cadre of Senior Clerk has also been granted/allowed 10% promotion quota in the cadre of appellant while as per Serial No.35, Column-6 the Senior Clerks have 75% quota for promotion to the post of Assistant (BPS-16) and 75% quota to the post of Accountant (BPS-16) in their own cadre.
- 7- That it is also pertinent to mention here that the appellant is belonging to the Uniform Cadre and the post of Assistant Superintendent Jail (BPS-16) purely falls in the Uniform Cadre and as such the cadre of Senior Clerk totally different and not related to the cadre of appellant. That the seniority of both the cadres is also maintained separately, therefore, the senior clerks have no right to be promoted to the post of Assistant Superintendent Jail (BPS-16).
- 8- That as per strength of the post of Assistant Superintendent Jail (BPS-16) the cadre of appellant is fully entitled to be enhanced promotion quota similarly to the other cadres who have been granted/allowed 75% promotion quota to the next higher scale which is evident from the service rules of the respondent Department.
- 9- That the appellant feeling aggrieved from the impugned service rules dated 15.04.2022 preferred departmental before the concerned authority but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the departmental appeal is attached as annexure.....D.

#### **GROUND:**

- A- That the impugned notification/service Rules issued vide dated 15-04-2022 are Ultra Vires, against the facts, law, norms of natural justice and materials on the record hence not tenable and liable to be modified/amended.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant as enshrined in the Constitution of Pakistan 1973.
- D- That, the appellant has been discriminated by the respondents on the subject noted above and as such the respondents violated the Principle of Natural Justice.
- E- That the impugned Notification dated 15.04.2022 due to which the promotion quota of the appellant has been divided between the cadre of appellant and Senior Clerk is not tenable under the law and rules and would certainly affect the promotion quota of the appellant.

- F- That according to Article-38 (e) of the Constitution of Pakistan, 1973, the State is bound to reduce disparity in the income and earnings of individuals including persons in the services of the Federation. That in light of the mentioned Article the appellant is on strong footing.
- G- That the respondents acted in arbitrary and malafide manner while issuing the impugned Notification dated 15.04.2022.
- H- That the cadre of Senior Clerk belonging to the clerical in nature and as such they have already 75% quota for promotion to the post of Assistant (BPS-16) and 75% for promotion to the post of Accountant (BPS-16), therefore, granting 10% quota to the Senior Clerks in the cadre of appellant is violation of the principle of natural justice and also violative of legal right of the appellant cadre.
- I- That the impugned Notification dated 15.04.2022 of the respondent department is violative of Section-9 of the Civil Servants Act, 1973 read with Rule-7 of the Appointment, Promotion and Transfer Rules, 1989.
- J- That the petitioner seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

Dated: 29.11.2022.

APPELLANT

*Dad Muhammad*  
DAD MUHAMMAD

Through:

*Mir Zaman Safi*  
MIR ZAMAN SAFI  
Advocate, High Court,  
Peshawar

**CERTIFICATE:**

It is, certified that no other earlier appeal was filed between the parties.

*Mir Zaman Safi*  
DEPONENT

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

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

APPEAL NO. \_\_\_\_\_/2022


**DAD MUHAMMAD**

**VS**

**GOVT: OF KP & OTHERS**

**AFFIDAVIT**

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

  
**MIR ZAMAN SAFI,**  
Advocate  
High Court, Peshawar

**FINAL SENIORITY LIST OF CHIEF HEAD WARDERS (BPS-11) OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT AS STOOD ON 01-10-2022**  
 Sanctioned Strength of Chief Head Warden (EPS-11) = 98, Present = 92 and Vacant = 06

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FB	Name with parentage	Domicile	DOB	Qualifi- Cation	DOA	DOP to H/Warder	DOP to CH/Warder	Departmental Exam for Asstt. Supdt. Jail	Promotion Training of Chief Head Warder for Asstt. Supdt. Jail
1	Allah Mir S/o Muhammad Uzair	Charsadda	4-Nov-1962	Middle	6-Feb-1981	6-May-1999	4-Jun-2012	Not Eligible	Not Eligible
	Syed Rustam Shah S/o Syed Alam Shah	Charsadda	4-Apr-1965	Middle	10-Aug-1983	27-May-2005	26-Sep-2016	Not Eligible	Not Eligible
	Naccmur Rahman S/o Khalilur Rahman	Charsadda	9-Nov-1962	Middle	16-Dec-1983	5-Sep-2003	4-Jun-2012	Not Eligible	Not Eligible
4.	Himmat Wali S/o Shahzada	Charsadda	4-Apr-1964	Middle	23-Apr-1984	12-Oct-2010	31-Jan-2020	Not Eligible	Not Eligible
5	Abdul Wahid S/o Khalid Khan	Swabi	2-Dec-1966	Matric	3-Aug-1985	4-Feb-2007	26-Sep-2016	Not Eligible	Not eligible
6.	Abdur Razaq s/o Sufi Muhammad Akram	Haripur	1-Jan-1966	Middle	11-Nov-1985	5-Sep-2003	15-May-2014	Not Eligible	Not Eligible
7.	Muhtaj Muhammad S/o Din Muhammad	Charsadda	17-Apr-1966	Middle	19-Feb-1986	7-May-2012	31-Jan-2020	Not Eligible	Not Eligible
	Iltaf Hussain S/o Rab Nawaz	D.I.Khan	20-Apr-1964	Matric	22-Apr-1986	29-Oct-2011	26-Sep-2016	Result awaiting	Yes, Qualified
	Shah Jehan s-o Shamshad Khan	Charsadda	6-Feb-1966	9th Class	1-Jun-1986	29-Oct-2011	31-Jan-2020	Not Eligible	Not eligible
	Sherza Khan S/o Said Muhammad	Lakki	11-Oct-1967	Middle	3-Jul-1986	8-Feb-2012	26-Sep-2016	Not Eligible	Not Eligible
	Abdul Zahid S/O Ghulam Haider	Swabi	4-Nov-1967	Matric	5-Jul-1986	9-Feb-2012	9-Oct-2020	Result awaiting	Yes, Qualified
12.	Kifayatullah S/o Wisal Khan	Mardan	15-Mar-1964	Middle	20-Aug-1986	8-Feb-2012	26-Sep-2016	Not Eligible	Not Eligible
13.	Mir Aman S/o Karim Khan	Mardan	21-Mar-1966	Middle	8-Sep-1986	29-Oct-2011	26-Sep-2016	Not Eligible	Not Eligible
14.	Muhammad Zaman s-o Saiful Malook	Lakki	1-Dec-1968	Middle	22-Jul-1987	17-Jun-2013	31-Jan-2020	Not Eligible	Not eligible
15.	Muhammad Nawaz S/o Muhammad Baz	Charsadda	10-May-1968	Middle	25-Jul-1987	5-Sep-2003	26-Sep-2016	Not eligible	Not Eligible
16.	Sangeen Khan S/o Wakeel Khan	Nowshera	8-Nov-1966	Middle	1-Sep-1987	5-Sep-2003	26-Sep-2016	Not eligible	Not Eligible
17.	Zar Ali s-o Maqbal Khan	Nowshera	4-Feb-1963	Middle	2-Dec-1987	8-Feb-2012	31-Jan-2020	Not eligible	Not eligible
18.	Noor Khatab s-o Redi Khan	Mardan	2-Oct-1964	Middle	7-May-1988	12-Oct-2012	31-Jan-2020	Not eligible	Not eligible
19.	Mir Alam S/O Amin Ullah	Swabi	21-Apr-1966	Middle	1-Jun-1988	2-Dec-2012	9-Oct-2020	Not eligible	Not eligible
20.	Gul Habib s-o Ghulam Habib	Charsadda	15-Apr-1966	Matric	5-Aug-1988	12-Oct-2012	31-Jan-2020	Result awaiting	Not Eligible

12/10/2022  
 P. S. J. W. D.  
 KHYBER PAKHTUNKHWA  
 PRISONS DEPARTMENT

*[Handwritten Signature]*



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PB	Name with parentage	Domicile	DOB	Qualification	DOA	POP to H/Warder	DOP to CH/Warder	Departmental Exam for Asstt: Supdt: Jail	Promotion Training of Chief Head Warder for Asstt: Supdt: Jail
21.	Dil Aram s-o Khan Zaman	Nowshera	1-Sep-1968	8th	10-Aug-1988	12-Oct-2012	31-Jan-2020	Not Eligible	Not eligible
22.	Munawar Khan s-o Toti Khan	Lakki Marwat	1-Feb-1966	Middle	4-Dec-1986	8-Feb-2012	04-Aug-2021	Not Eligible	Not eligible
23.	Fazal Muhammad s-o Mir Muhammad	Peshawar	4-Apr-1968	Middle	20-Jul-1988	17-Jun-2013	04-Aug-2021	Not Eligible	Not eligible
24.	Banaras Khan s-o Mohabbat Khan	Charsadda	1-Jan-1967	Middle	14-Sep-1988	28-May-2015	04-Aug-2021	Not Eligible	Not eligible
25.	Hamesh Gul s-o Lehaz Gul	Charsadda	20-Apr-1969	Matric	12-Nov-1988	13-Mar-2013	04-Aug-2021	Result awaiting	Not yet undergone
26.	Noor Zaman S-o Mir Akbar Khan	Bannu	13-Mar-1970	B.A	12-Oct-1989	17-Jun-2013	04-Aug-2021	Result awaiting	Yes, Qualified
27.	Hazrat Muhammad S/o Muhammad Khan	Mardan	1-Jan-1968	Middle	14-Oct-1989	23-Jun-2013	04-Aug-2021	Not Eligible	Not eligible
28.	Pisar Muhammad: S-o Ali Asghar	Mardan	2-Jan-1965	Matric	17-Oct-1989	17-Jun-2013	04-Aug-2021	Result awaiting	Yes, Qualified
29.	Alamgir s-o Zardullah	Mardan	1-Jan-1967	FA	17-Oct-1989	13-Mar-2013	04-Aug-2021	Result awaiting	Yes, Qualified
30.	Jamsher Khan s/o Mukaram Khan	Mardan	15-Jan-1968	Matric	20-Oct-1989	17-Jun-2013	04-Aug-2021	Result awaiting	Yes, Qualified
31.	Nooruz Ameen s/o Haji Gul Noor	FR-Kohat	1-Jul-1971	Middle	14-Nov-1989	17-Jun-2013	04-Aug-2021	Not Eligible	Not eligible
32.	Abdul Mastan s-o Zabita Khan	Mardan	20-Dec-1968	Matric	15-Nov-1989	17-Jun-2013	04-Aug-2021	Result awaiting	Yes, Qualified
33.	Amin Khan S-o Hussain Khan	Mardan	1-Dec-1970	Matric	15-Nov-1989	17-Jun-2013	04-Aug-2021	Result awaiting	Yes, Qualified
34.	Fida Muhammad s/o Muhammad Akram	Haripur	25-Jun-1965	Middle	23-Nov-1989	1-Jun-2013	04-Aug-2021	Not Eligible	Not eligible
35.	Shah Nawaz S-o Hashim Khan	Mardan	3-Sep-1968	Matric	25-Nov-1989	17-Jun-2013	04-Aug-2021	Result awaiting	Not yet undergone
36.	Zahirullah S-o Fareed Khan	Charsada	1-Jan-1968	Middle	02-Dec-1989	15-May-2014	04-Aug-2021	Not Eligible	Not eligible
37.	Izat Khan S-o Sharif Khan	Malakand	2-Feb-1965	Middle	21-Dec-1989	15-May-2014	04-Aug-2021	Not Eligible	Not eligible
38.	Arshad Jalal s/o Jalal Mas'eh	Peshawar	06-Nov-1963	Matric	29-Jan-1990	15-May-2014	04-Aug-2021	Result awaiting	Not yet undergone
39.	Jauhar Ali S-o Noor Habib	Charsada	21-Jan-1964	F.A	2-Jul-1990	15-May-2014	04-Aug-2021	Result awaiting	Not yet undergone
40.	Muhammad Amin S/o Ikram Khan	Mardan	23-Feb-1966	Matric	11-Feb-1990	27-Dec-2016	04-Aug-2021	Result awaiting	Not yet undergone
41.	Raj Wali S-o Masoom Shah	Mardan	22-Apr-1968	Matric	14-Feb-1990	15-May-2014	04-Aug-2021	Result awaiting	Not yet undergone
42.	Zakirullah S/o Ibadullah	Charsadda	8-Feb-1970	Matric	18-Feb-1990	28-Feb-2020	04-Aug-2021	Result awaiting	Not yet undergone
43.	Muhammad Raheem S-o Abdur Raheem	Charsadda	12-Jun-1974	Middle	19-Jul-1990	15-May-2014	04-Aug-2021	Not Eligible	Not eligible
44.	Arshad Ali S-o Ali Akbar	Peshawar	1-Jan-1971	Matric	15-Aug-1990	15-May-2014	04-Aug-2021	Result awaiting	Not yet undergone

8

PS	Name with parentage	Domicile	DOB	Qualification	DOA	DOP to H/Warder	DOP to CH/Warder	Departmental Exam for Asstt: Supdt: Jail	Promotion Training of Chief Head Warder for Asstt: Supdt: Jail
45.	Maazullah S-o Shah Khel	Charsadda	29-Oct-1970	Matric	18-Aug-1990	15-May-2014	04-Aug-2021	Result awaiting	Not yet undergone
46.	Akbar Khan S-o Faheem Jan	Dir (Upper)	23-Aug-1967	Matric	5-Sep-1990	11-Jun-2014	04-Aug-2021	Result awaiting	Not yet undergone
47.	Muambar Khan S-o Sadbar	Malakand	6-Jul-1969	Matric	17-Sep-1990	15-May-2014	04-Aug-2021	Result awaiting	Not yet undergone
48.	Razeen Ahmad S-o Shahzada Khan	Swabi	1-Jun-1969	Matric	16-Jan-1991	15-May-2014	08-04-2022	Not yet appeared	Not yet undergone
49.	Shakir Khan s-o Fazal Nabi	Nowshera	30-Oct-1969	Matric	14-Apr-1991	29-Oct-2014	08-04-2022	Not yet appeared	Not yet undergone
50.	Qazi Hasbunullah s-o Qazi Rafiullah	Charsadda	22-Apr-1972	M.A	18-Jun-1991	11-Jun-2014	08-04-2022	Not yet appeared	Not yet undergone
51.	Hussan Karim s-o Karim Dad	SJ Nowshera	1-Jan-1969	Matric	27-Jul-1991	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
52.	Sajawal Shah S/o Pir Sakhi Shah	Charsadda	12-Mar-1973	Matric	16-Sep-1991	27-Dec-2016	08-04-2022	Not yet appeared	Not yet undergone
53.	Zahoorullah s-o Faqir Jan	Charsadda	15-Apr-1971	Matric	23-Oct-1991	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
54.	Muhammad Islam s-o Muhammad Alam	Mardan	3-Jan-1973	Middle	26-Oct-1991	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
55.	Ali Sher s/o Ghulam Hussain	Swabi	2-Mar-1971	Matric	23-Dec-1991	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
56.	Daulat Khan s-o Muhammad Zaman	Nowshera	9-Dec-1973	Matric	29-Dec-1991	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
57.	Alamzeb s/o Fazle Khalig	Charsadda	5-Jan-1971	M.A	7-Jan-1992	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
58.	Abdur Rahman s/o Gul Rahman	Mardan	6-Feb-1967	Matric	1-Feb-1992	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
59.	Bashir Ahmad s-o Mian Muhammad	Abbottabad	15-Apr-1971	Matric	16-Feb-1992	11-Jun-2014	08-04-2022	Not yet appeared	Not yet undergone
60.	Rahmanullah s-o Sher Bahadur	Bannu	10-Oct-1972	FA	29-Feb-1992	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
61.	Asghar Khan S/o Sangeen Khan	Dir (Lower)	2-Feb-1974	Matric	8-Apr-1992	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
62.	Abdul Hameed s/o Abdul Qayum	Abbottabad	4-Oct-1972	Matric	25-Apr-1992	28-May-2015	08-04-2022	Not yet appeared	Not yet undergone
63.	Noorul-Ameen s-o Sher Muhammad	Charsadda	24-Mar-1970	F.A	1-May-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
64.	Syed Abbas Shah s/o Syed Abid Shah	Charsadda	1-Nov-1970	Matric	1-May-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
65.	Usman Akbar s/o Shamoos Khan	Swabi	13-Feb-1967	Matric	23-Jul-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone

M. J. Khan

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PE	Name with parentage	Domicile	DOB	Qualifi- Cation	DOA	DOP to H/Warder	DOP to CH/Warder	Departmental Exam for Asstt: Supdt: Jail	Promot Training of Chief Head Warder for Asstt: Supdt: Jail
66.	Nasir Khan s/o Shahzad Gul	Mardan	5-Jan-1972	F.A	27-Jul-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
67.	Shireen Zada s-o Badshah Ghi	Dir (L)	8-May-1963	M.A	04-Aug-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
68.	Alamzeb s-o Muhammad Zaman	Manshra	13-Nov-1973	Matric	20-Oct-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
69.	Ilyas Khan s-o Sarfaraz Khan	Dir (L)	16-Mar-1973	Matric	04-Nov-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
70.	Sajjad Ali s/o Jamalud Din	Charsadda	5-Jan-1974	Matric	25-Nov-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
71.	Jan Ali s-o Shah Pasand	Charsadda	10-Mar-1970	F.A	27-Dec-1992	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
72.	Rahim Dad S/o AbdulGhani Khan	Charsadda	15-Apr-1970	Matric	5-Jan-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
73.	Ashraf Ali s-o Musharaf Khan	Peshawar	20-Apr-1972	FA	14-Apr-1993	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
74.	Asmat Ali s/o Khushdil Khan	Nowhera	13-Apr-1974	Matric	15-Apr-1993	28-May-2015	29-04-2022	Not yet appeared	Not yet undergone
75.	Amir Hassan S/o Sher Muhammad	Dir (Upper)	1-Sep-1971	FA	10-Jun-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
76.	Umar Daraz Khan S/o Nasrullah Khan	Peshawar	1-Feb-1973	Matric	14-Jun-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
77.	Naik Marjan S/o Rahim Jan	Karak	1-Jan-1972	Matric	18-Aug-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
78.	Anwar Khan S/o Lal Muhammad	Peshawar	1-Jan-1973	Matric	21-Aug-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
79.	Mujadad Khan S/o Muhammad Saleem Khan	Haripur	4-Jan-1974	Matric	22-Aug-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
80.	Waheed Akhtar S/o Taj Muhammad	Haripur	4-Apr-1973	Middle	23-Aug-1993	12-Jan-2017	29-04-2022	Not yet appeared	Not yet undergone
81.	Muhammad Nasir S/o Haji Muhammad	D.I.Khan	1-Jan-1970	B.A	24-Aug-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
82.	Javed Iqbal S/o Abdul Rauf	Mardan	20-Apr-1971	Matric	29-Aug-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
83.	Sher Alam S/o Haidar Khan	Charsadda	10-Jul-1972	Matric	14-Sep-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
84.	Janas Khan S/o Raza Khan	Peshawar	2-Mar-1975	Matric	14-Sep-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
85.	Tasawaf Hassan S/o Muhammad Ali	Kohat	26-Apr-1970	F.A	18-Sep-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
86.	Inamullah S/o Karcemullah	Mardan	22-Feb-1973	Matric	18-Sep-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
87.	Shoaib Niaz S/o Umar Baz	Bannu	3-Feb-1975	FA	25-Sep-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone

PS	Name with parentage	Domicile	DOB	Qualification	DOA	DOP to H/Warder	DOP to CH/Warder	Departmental Exam for Asstt: Supdt: Jail	Promotion Training of Chief Head Warder for Asstt: Supdt: Jail
88.	Mohibullah Sher S/o Saleem Sher	Charsadda	19-May-1968	B.A	19-Oct-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
89.	Mehboob Elahi S/o Allah Ditta	Haripur	7-Feb-1973	Matric	23-Oct-1993	27-Dec-2016	29-04-2022	Not yet appeared	Not yet undergone
90.	Dad Muhammad S/o Nasrullah	Charsadda	12-Mar-1971	Matric	25-Jun-1994	28-Feb-2020	29-04-2022	Not yet appeared	Not yet undergone
91.	Shaukat Khan S/o Gul Rahman	Peshawar	15-Jun-1977	F.A	9-Aug-1999	28-Sep-2009	26-Sep-2016	Passed	Not yet undergone

No. 6684-91

dated: 03-10-2022

Copy of the above is forwarded to the:-

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. DIGs Prisons, Regional Prison Office Peshawar, Mardan, Bannu and Abbottabad.
3. Superintendent Headquarters Prison D.I Khan, Mardan and Haripur.  
for information and further necessary action.

  
**SUPERINTENDENT**  
HEADQUARTERS PRISON PESHAWAR

  
**SUPERINTENDENT**  
HEADQUARTERS PRISON PESHAWAR

15

**GOVERNMENT OF KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT**

**NOTIFICATION**

*Peshawar, dated the 15<sup>TH</sup> April, 2022*

No. SO(P&R)/1-33/2021. In exercise of the powers conferred by sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous notifications issued in this regard, the Home & Tribal Affairs Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions, applicable to post, born on the strength of the Inspectorate of Prisons Khyber Pakhtunkhwa, as specified in column No.2 of the attached appendix:

**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME AND TRIBAL AFFAIRS DEPARTMENT**

**Endst No. and Date even:** Copy forwarded to:-

- 1- The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Peshawar.
- 2- The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
- 3- The Secretary to Government of Khyber Pakhtunkhwa, Law & Parliamentary Affairs Department Peshawar.
- 4- The Secretary to Government of Khyber Pakhtunkhwa, Health Department, Peshawar.
- 5- The Secretary to Government of Khyber Pakhtunkhwa, P & D Department Peshawar.
- 6- The Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar.
- 7- The Manager, Government Printing Press Peshawar for publication in the Government Gazette. He is further requested to send ten (10) copies of the said Gazette Notification to the Law Department as well as Home and Prisons Departments for record.
- 8- PS. to Home Secretary Khyber Pakhtunkhwa.

**DEPUTY SECRETARY (P&R)**

Deputy Secretary (P&R) & Regulation  
Govt. of Khyber Pakhtunkhwa  
Home & Tribal Affairs Department

ATTACHED

B-11

APPENDIX.

**UPPER EXECUTIVE STAFF**

1 SERIAL NO	2 NOMENCLATURE OF POST	3 MINIMUM QUALIFICATION FOR APPOINTMENT BY INITIAL RECRUITMENT OR BY TRANSFER	4 MINIMUM QUALIFICATION PRESCRIBED FOR PROMOTION	5 AGE LIMIT	6 METHOD OF RECRUITMENT
1.	Inspector General Prisons (BPS-20)	---	---	---	<p>By promotion, on the basis of selection on merit, from amongst the holders of the posts of Deputy Inspector General of Prisons, Commandants and Superintendents Central Prisons, with at least seventeen (17) years service in BPS-17 and above, who have successfully completed Senior Management Course:</p> <p>Provided that if no suitable officer is available for promotion then by transfer from PAS / PMS Officers.</p> <p><b>Note:</b> For the purpose of promotion to the post of Inspector General of Prisons, a joint seniority list of Deputy Inspector General Prisons, Commandants and Superintendents Central Prisons shall be maintained.</p>
2.	Deputy Inspector General Prisons/ Commandant/ Superintendent Central Prisons (BPS-19)	---	-	-	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of the Assistant Inspector General Prisons, Deputy Commandants and Superintendents, District Jails, with at least twelve (12) years service in BPS-17 and above, who have passed departmental examination prescribed for Superintendent Jail Class-I:</p> <p>Provided that if no suitable officer is available for promotion then by transfer from amongst PAS / PMS Officers.</p> <p><b>Note:</b> For the purpose of promotion, to the posts of Deputy Inspector General Prison, Commandants and Superintendent Central Prison, a joint seniority of the Assistant Inspectors General Prisons, Deputy Commandants and Superintendents District Jail shall be maintained.</p>

12

Deputy Secretary

13

1	2	3	4	5	6
3.	Assistant Inspector General Prisons /Deputy Commandant/ Superintendent District Jail (BPS-18)	---	-	-	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Deputy Superintendents Jail, PSO to Commandant and Senior Instructors (Prisons Management), with at least five years service as such, and who have successfully qualified departmental examination prescribed for Superintendent Jail Class-II.</p> <p><b>Note:</b> For the purpose of promotion to the post of Assistant Inspector General Prisons/Deputy Commandant/ Superintendent District Jail, a joint seniority of Deputy Superintendents Jail/PSO to Commandant and Senior Instructors (Prisons Management) shall be maintained.</p>
4.	Deputy Superintendent Jails/PSO to Commandant/ Senior Instructor (Prison Management) (BPS-17)	<p>(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University; and</p> <p>(b) <b>Physical standard:</b></p> <p>(i) height 5 feet and 7 inches;</p> <p>(ii) chest 33x34 inches without expansion and 33x34 1/2 with expansion.</p> <p>(iii) vision of eyes 6/6, without glasses;</p> <p>(iv) free from any kind of disability.</p>	-	21 To 30 Years	<p>(a) Seventy percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts Assistant Superintendents Jail and Assistant Superintendent Jail (Female), with at least five years service as such, subject to-</p> <p>(i) successful completion of promotion course prescribed for Deputy Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Deputy Superintendent Jail;</p> <p>(b) ten percent by initial recruitment through Public Service Commission from amongst the holders of the posts in service Assistant Superintendents Jail, who have atleast three years service and possess minimum qualification or eligibility criteria prescribed for initial recruitment as specified in column No.3; and</p> <p>(c) Twenty percent by initial recruitment.</p> <p><b>Note:</b> For the purpose of promotion to the posts of Deputy Superintendent jails/PSO to commandant/Senior Instructor (Prison Management), a joint seniority of Assistant Superintendents Jail and Assistant Superintendent Jail (Female) shall be maintained.</p>

*[Handwritten signature]*

*[Handwritten signature]*

(14)

1	2	3	4	5	6
5.	Assistant Superintendent Jail (BPS-16)	(a) At least Second Class Bachelor's Degree, or its equivalent qualification from a recognized University; and  (b) Physical standard:  (i) height 5 feet and 7 inches;  (ii) chest 33x34 inches without expansion and 33x34 1/2 with expansion;  (iii) vision of eyes 6/6 without glasses;  (iv) free from any kind of disability.		21 To 30 * Years	(a) Thirty percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Chief Head Warders, having Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years service as Head Warder and Chief Head Warder, subject to-  (i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and (ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; (b) ten percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts in service Senior Clerks, who possess minimum qualification or eligibility criteria prescribed for initial recruitment, with at least five years service as Junior Clerk and Senior Clerk, subject to- (i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and (ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and (c) sixty percent by initial recruitment.
6.	Assistant Superintendent Jail (Female)(BPS-16)	(a) At least Second class Bachelor's Degree or its equivalent qualification from a recognized University; and  (b) Physical standard: (i) height 5 feet & 01 inch; (ii) Vision of eyes 6/6 without glasses; and (iii). Free from any kind of disability.		21 To 30 Years	(a) Twenty five percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Chief Head Warders (Female), with Secondary School Certificate or its equivalent qualification from recognized Board, and at least five years service as Head Warder (Female) and Chief Head warder (Female), subject to- (i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and (ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and (b) seventy-five percent by initial recruitment;

Deputy Commissioner  
Govt. of Jharkhand  
Hans @ 11/11/2021

(Signature)



(5)


<b>WATCH AND WARD STAFF</b>					
1	2	3	4	5	6
7.	Chief Head Warder (BPS-11)	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and  (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Head warders, with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Chief Head Warder; (b) clearance of Departmental Professional Examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4.  <b>Note:</b> Head Warders, who possess Middle pass qualification, are exempted from condition of clause (b) above.
8.	Chief Head Warder (Female)(BPS-11)	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and  (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Head warders (Female), with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Chief Head Warder (Female); (b) clearance of departmental professional examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4.  <b>Note:</b> Head Warders (Female), who possess Middle pass qualification, are exempted from condition of clause(b) above;

Deputy Secretary (Recruitment)  
Govt of Jharkhand  
Bokaro & District Administration

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1	2	3	4	5	6
9.	Gate Keeper (BPS-11).	(i) Secondary School Certificate in Second Division from a recognized Board; and  (ii) Ex-Junior Commissioned Officer from Armed /Paramilitary forces.	---	30 to 45 Years	By initial recruitment.
10.	Head Warden (BPS-09).	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and  (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed on or after 04.11.2002	---	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Warders, with at least five years service as such, subject to- (a) successful completion of promotion course prescribed for Head Warden. (b) Clearance of Departmental Professional Examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4.  <b>Note:</b> Warders appointed prior to 04-11-2002, are exempted from condition of clause(b) above;

Deputy Secretary (General Administration)  
Govt. of Khyber Pakhtunkhwa  
Home & Tribal Affairs Department

ATTESTED  


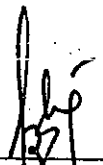

17

1	2	3	4	5	6
11.	Head Warder (Female) (BPS-09)		(a) Middle passed for those officials who were appointed prior to 04.11.2002; and  (b) Secondary School Certificate or its equivalent qualification from a recognized Board		By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Female Warders, with at least five years service as such, subject to-  (a) successful completion of promotion course prescribed for Head Warder Female; (b) clearance of Departmental Professional Examination prescribed in their own cadre; and (c) possess minimum qualification as specified in column No.4.
			for those officials who were appointed, on or after 04.11.2002		<b>Note:</b> Female Warders, appointed prior to 04-11-2002 are exempted from condition of clause (b), above.

Deputy Secretary (General) Government of Jammu & Kashmir Home & Tribal Affairs

ATTESTED

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1	2	3	4	5	6
12.	Warder (BPS-07)	<p><b>For fresh candidates.</b></p> <p>(a) At least Secondary School Certificate, in Second Division or its equivalent qualification from a recognized Board;</p> <p>(b) for fresh candidates, with minimum physical standard-</p> <p>(i) height: 5 feet and 7 inches; and</p> <p>(ii) chest: 33x34 inches without expansion and 33x34 1/2 inches with expansion.</p>		<p>(a) For fresh candidates 18 to 30 years and-</p> <p>(b) For Ex-Uniform personnel of Pakistan Armed Forces/Para-Military Forces upto maximum 40 years</p>	<p>By initial recruitment:-</p> <p>Provided that preference shall be given to Ex-Uniform Personnel of Pakistan Armed Forces i.e Army, Navy, Air Force, Marines (Combat Arms Services) and Ex-Para-military Forces i.e Defence Services Guards, Pakistan National Guards (Mujahid Force), Frontier Constabulary, Rangers, Frontier Corps, Gilgit Baltistan Scouts, Coast Guards, Baluchistan Scouts, Militia (Combat Arms Services) and Ex-Police personnel, retired from service within the last five years and not dismissed or retired from service on medical board grounds, having atleast five years service at credit with discharge certificate, graded as "Satisfactory / Good / Exemplary.</p>
		<p><b>For Ex-Uniform Personnel of Pakistan Armed Forces/Para-military forces.</b></p> <p>(a) at least Secondary School Certificate, or its equivalent qualification from recognized Board;</p> <p>(b) minimum physical standard-</p> <p>(i) height: 5 feet and 6 inches; and</p> <p>(ii) Chest: 32x33 inches without expansion and 32x33 1/2 inches with expansion.</p> <p><b>Note:</b> All Candidates shall be-</p> <p>(i) Free from any kind of disability</p> <p>(ii) with vision of eyes 6/6 without glasses.</p>			

Secretary Secretary (Personnel)  
Govt of Punjab, Government  
House & Transport Department

(19)

1	2	3	4	5	6
13.	Warder (Female) (BPS-07)	(a) At least Secondary School certificate in Second division or its equivalent qualification from recognized Board; and.  (b) <b>Physical Standard:</b> (i) height 5 feet & 1 Inch; (ii) vision of eyes 6/6 without glasses; and (iii) Free from any kind of disability	-	18 to 30 years	By initial recruitment.
<b>MEDICAL &amp; PARAMEDICAL STAFF</b>					
14.	Principal Medical Officer (BPS-19)	---	--	-	By transfer from Health Department.
15	Senior Medical Officer (BPS-18)	---	--	-	By transfer from Health Department.
16	Surgical Specialist (BPS-18)	---	--	-	By transfer from Health Department.
17	Cardiologist Specialist (BPS-18)	---	--	-	By transfer from Health Department.
18	Physiotherapist (BPS-18)	---	--	-	By transfer from Health Department.
19	Psychiatrist. (BPS-18)	---	--	-	By transfer from Health Department.
20	Psychologist (BPS-17)	At least Second class Master's Degree in Psychology or its equivalent qualification from a recognized University.	--	21 to 35 Years	By Initial recruitment.
21	Medical Officer (BPS-17)	---	--	-	By transfer from Health Department.
22	Women Medical Officer (BPS-17)	---	--	-	By transfer from Health Department.
23	Dental Surgeon. (BPS-17)	---	--	-	By transfer from Health Department.

22

1	2	3	4	5	6
24	Technologist (BPS-17)	At least Second Class Bachelor's Degree in the relevant Technology (Pharmacy/Pathology/Dental/Surgical etc) from a recognized University/ Institution		20 to 32 Years	(a) Sixty percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Chief Technicians, with atleast three years' service as such; and (b) forty per cent by initial recruitment.
25	Chief Technician (BPS-16)				By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of <b>Senior Technicians</b> with at least <b>two</b> years service as such.
26	Senior Technician (BPS-16)				By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of <b>Technicians</b> , with at least <b>five</b> years service as Junior Technician and Technician.
27	Nurse (BPS-16)				By transfer from Health Department.
28	Female Nurse (BPS-16)				By transfer from Health Department
29	Technician (BPS-14)				By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of <b>Junior Technicians</b> , with at least three years service as such.
30	Junior Technician (BPS-12)	(a) At least Secondary School Certificate with Science in Second division or its equivalent qualification from recognized Board; and (b) A diploma from a recognized Institution in the relevant field duly enrolled with Khyber Pakhtunkhwa Medical Faculty.		18 to 30 Years	By initial recruitment.
31	Lady Health Visitor				By transfer from Health Department.

Deputy Secretary (Recruitment)  
Board of Technical Education  
Islamabad

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**MINISTERIAL STAFF**

1	2	3	4	5	6
32.	Deputy Director (BPS-18)	---	-	-	By promotion on the basis of seniority-cum-fitness, from amongst the holders of the posts of Assistant Directors, with at least five years service in BPS-17; Provided that if no suitable officer is available for promotion then by transfer.
33.	Assistant Director (BPS-17)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Superintendents and Budget and Accounts Officers, with at least three years service as such. <b>Note:-</b> For the purpose of promotion to the post of Assistant Director, a joint seniority list of Superintendents and Budget and Accounts Officers shall be maintained.
34.	Superintendent/ Budget and Accounts Officer (BPS-17)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Assistants and Accountants, with at least 5 years service as such. <b>Note:-</b> For the purpose of promotion to the post of Superintendent/Budget and Accounts Officer, a joint seniority of Assistant and Accountants and Accountants shall be maintained.
35.	Assistant/ Accountant (BPS-16)	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University.	-	20 to 32 Years	(a) Seventy-five percent by promotion, on the basis of seniority-cum fitness, from amongst the holders of the posts of Senior Clerks and Assistant Accountants, with at least five years service as Junior Clerk and Senior Clerk or Assistant Accountant. <b>Note:</b> For the purpose of promotion to the post of Assistant/Accountant, a joint seniority of Senior Clerk and Assistant Accountant shall be maintained; and  (b) Twenty- five percent by initial recruitment:
36.	Senior Clerk/ Assistant Accountant (BPS-14)	---	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Junior Clerks, with at least two years service as such.

1	2	3	4	5	6
37.	Junior Clerk (BPS-11)	<p>(a) FA/F.Sc with Second Division or its equivalent qualification from a recognized Board; and</p> <p>(b) a speed of thirty (30) words per minute in typing in English on computer.</p>	Matriculation or its equivalent qualification from a recognized Board.	18 to 30 Years.	<p>(a) Twenty five percent by promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Restorers, Naib Qasids, Bahishtis/Water Carriers, Photostate Machine Operators, Tubewell Operators, Plumbers, Malis, Engine Men, Dhobis, Chowkidars, Pipe Fitters, Sweepers, including holders of other equivalent posts in the Department, with two years service as such, having qualification as specified in column No.3: Provided that if no suitable official is available for promotion then by initial recruitment;</p> <p>(b) twenty-five percent by initial recruitment from amongst Warders, who have at least five years service and possess minimum qualification prescribed for initial recruitment: Provided that :-</p> <p>(i) if two or more officials have acquired the F.A/F.Sc qualification in the same session, the inter-se-seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and</p> <p>(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official, next junior to him possessing the requisite qualification, shall be promoted in preference to the senior official or officials: Provided further that the condition F.A/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a), shall not apply till the expiration of a period as specified in the second proviso in column No.5, against Serial No.4 of the Establishment Department's Amending Notification No. SO(E&amp;D)/1-35/2014, dated 18-07-2019, to the existing matriculate incumbents of the posts of Restorer, Naib Qasid, Bahishti / Water Carrier, Photostate Machine Operator, Tubewell Operator, Plumber, Mali, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper, including holders of other equivalent posts, for promotion to the post of Junior Clerk.</p> <p><u>Note:</u> For the purpose of promotion, there shall be maintained a joint seniority list of Restorer, Naib Qasid, Bahishti/Water Carrier, , Photostate Machine Operator, Tubewell Operator, Plumber, Mali, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper etc; with reference to the dates of their acquiring the F.A /F.Sc or its equivalent qualification from a recognized Board; and</p> <p>(c) Fifty percent by initial recruitment.</p>

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1	2	3	4	5	6
85	Bahishti/Water Carrier (BPS-03)	Primary Pass	-	18 to 40 Years	By initial recruitment
86	Naib Qasid (BPS-03)	Primary Pass	-	18 to 40 Years	By initial recruitment
87	Chowkidar (BPS-03)	-----	-	18 to 40 Years	By initial recruitment
88	Sweeper (BPS-03)	-----	-	18 to 40 Years	By initial recruitment
89	Plumber (BPS-03)	Preferably Literate	-	18 to 40 years	By initial recruitment from the respective Districts.
90	Barber (BPS-03)	Preferably Literate and skilled in the relevant trade	-	18 to 40 years	By initial recruitment from the respective Districts.
91	Baker (BPS-03)	Preferably Literate and skilled in the relevant trade	-	18 to 40 years	By initial recruitment from the respective Districts.
92	Dhobi (BPS-03)	Preferably Literate and skilled in the relevant trade	-	18 to 40 years	By initial recruitment from the respective Districts.
93	Attendant (BPS-03)	Preferably Literate	-	18 to 40 years	By initial recruitment from the respective Districts.
94	Female Attendant (BPS-03)	Preferably Literate	-	18 to 40 years	By initial recruitment from the respective Districts.
95	Executioner (BPS-03)	Young energetic literate persons.	-	18 to 40 years	By initial recruitment from the respective Districts.
96	Piper (BPS-03)	Having practical skill in the relevant field.	-	18 to 40 years	By initial recruitment.
97	Drummer (BPS-03)	Having practical skill in the relevant field.	-	18 to 40 years	By initial recruitment.
98	Pipe Fitter (BPS-03)	Qualified in pipe fitting	-	18 to 40 years	By initial recruitment. after practical test.

\*\*\*\*\*

Report of the  
 Government of Punjab  
 Home Department

RECEIVED  
 12/08/2021  
 M. J. Khan



OFFICE OF THE  
COMMANDANT  
PRISONS STAFF TRAINING  
ACADEMY (PSTA) HARIPUR  
Fax: 0996-020067 Phone: 0996-020068  
psta@prisons.gov.pk

No. 847 Dated 18/10/2022

24

The Inspector General of Prisons,  
Khyber Pakhtunkhwa Peshawar.

Subject: ARRANGEMENT OF MANDATORY PROMOTION COURSE FOR ASSISTANT SUPERINTENDENT JAIL

R-Sir,

Please refer your letter No. 34471 dated 10.10.2022 and letter Endst No. 3540 dated 13.10.2022.

It is submitted that on 17.10.2022 a meeting was held in the Office of the undersigned with Superintendent Central Prison Haripur where Superintendent Central Prison Haripur was agreed to move the FC-Platoon (from the old place/barracks) from Prisons Staff Training Academy Haripur before 31.10.2022.

It is pertinent to mentioned here that the current basic course for newly warders will be ended on 31.10.2022. Therefore, the following schedule is arranged for promotional/basic training course

S#	Name of Course	Duration	No of Trainees	From	To
1.	Promotional course for Chief Warder/Senior Clerk to Assistant Superintendent Jail	02 Months	30	07.11.2022	09.01.2023
2.	Basic Training Course (Batch-II) for newly recruited Warders (Male) (Same Batch not to include Ex-Man)	02-Months	70	07.11.2022	09.01.2023

It is further added to direct the nominated trainees for promotional/basic training course to bring the below noted kits with them.

S#	Name of item/article	S#	Name of item/article
1	لڑیگ سوٹ بدمہ ہی ٹی شوز	2	اوپری (توبل)
3	لڑی ہی بیج سون	4	ٹام پلیٹ (کالا سادہ)
5	پاسیان سادہ	6	پینٹ (سلفیڈ)
7	06 جیبوں والی لم بو۔	8	شرٹ (کالا سادہ)
9	بوٹ (کالا رنگ)	10	بوٹ (کالا)
11	جواب نیا۔	12	پینٹ (سلفیڈ) مسر فائبر سٹریچ

Moreover, Trainers are of utmost importance for imparting of any type of training of workshop etc. The academy did not have its own trainers for delivering lecture and presentation. It is therefore requested that Superintendent Central Prison Haripur or other Jail's Superintendent may be directed to depute the trainers/instructors for the following subject/classes for the above mentioned promotional/basic courses or any other suitable arrangement of Trainers accordingly, please:

1.	Law Officer (To teach them PPC, related to court matters)	4	Prisons Administration/ Khyber Pakhtunkhwa Prisons Rules
2	Instructors (Drill/ PT)	5	Psychologist
3	Doctor (For awareness related First Aid, hygienic etc)		

COMMANDANT,  
PRISONS STAFF TRAINING ACADEMY  
PSTA-HARIPUR

21703

ATTACHED

*(Handwritten signature)*



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40  
5666  
24/10

No. \_\_\_\_\_  
Dated. 21-10-2022

To: The Commandant,  
Prison Staff Training Academy Haripur

Subject: **MANDATORY PROMOTION COURSE FOR CHIEF HEAD WARDERS / SENIOR CLERKS TO THE POST ASSISTANT SUPERINTENDENT / JAIL W.E.F. 07-11-2022 TO 09-01-2023**

Memo: I am directed to refer to your letter No. 847 dated 18-10-2022 on the subject and to state that the following Senior Clerks (BPS-14) and Chief Head Warders (BPS-11) are hereby nominated for the subject cited course, please:

S#	Name With Parentage & Designation	Place of Posting
1.	Muhammad Jamal, (Senior Clerk)	Inspectorate of Prisons
2.	Mr. Saeed Raza, (Senior Clerk)	Sub Jail Jamrud
3.	Mr. Abdul Haseeb, (Senior Clerk)	District Jail Kohat
4.	Mr. Nasir Khan, (Senior Clerk)	Central Prison Mardan
5.	Mr. Naveed Haider, (Senior Clerk)	District Jail Swat
6.	Muhammad Ali, (Senior Clerk)	Central Prison Mardan
7.	Mr. Hayat Ur Rehman, (Senior Clerk)	Sub Jail Dassu Kohistan
8.	Mr. Hamesh Gul S/o Lehas Gul, (CHW)	Central Prison Peshawar ✓
9.	Mr. Shah Nawaz S/o Hashim Khan, (CHW)	District Jail Chitral
10.	Mr. Arshad Jalal S/o Jalal Masih, (CHW)	Central Prison Peshawar ✓
11.	Mr. Johar Ali S/o Noor Habib, (CHW)	Central Prison Haripur
12.	Muhammad Amin S/o Ikram Khan, (CHW)	Central Prison Peshawar
13.	Mr. Raj Wali S/o Masoom Shah, (CHW)	District Jail Buner at Dagger
14.	Mr. Zakir Ullah S/o Ibad Ullah, (CHW)	Central Prison Mardan
15.	Mr. Arshad Ali S/o Ali Akbar, (CHW)	Central Prison Haripur
16.	Mr. Maaz Ullah S/o Shah Khel, (CHW)	Internment Centre Ghallanai
17.	Mr. Akbar Khan S/o Faheem Jan, (CHW)	District Jail Timergara
18.	Mr. Muambar S/o Sadbar, (CHW)	District Jail Buner at Dagger
19.	Mr. Razeen Ahmad S/o Shahzada Khan, (CHW)	Central Prison Haripur
20.	Mr. Shakir Khan S/o Fazal Nabi, (CHW)	Central Prison Peshawar
21.	Mr. Qazi Hasbun Ullah S/o Qazi Rafi Ullah, (CHW)	Sub Jail Charsadda (for duty)
22.	Mr. Hussan Karim S/o Karim Dad, (CHW)	District Jail Abbottabad
23.	Mr. Sajawal Khan S/o Pir Sakhi Shah, (CHW)	Sub Jail Charsadda (for duty)
24.	Mr. Zahoor Ullah S/o Faqir Jan, (CHW)	Central Prison Peshawar ✓
25.	Mr. Ali Sher S/o Ghulam Hussain, (CHW)	Central Prison Peshawar ✓
26.	Mr. Daulat Khan S/o Muhammad Zaman, (CHW)	Central Prison Peshawar ✓
27.	Mr. Alamzeb S/o Fazal Khaliq, (CHW)	Central Prison Peshawar ✓
28.	Mr. Abdur Rehman S/o Gul Rehman, (CHW)	Central Prison Mardan
29.	Mr. Basheer Ahmad S/o Mian Muhammad, (CHW)	District Jail Abbottabad
30.	Mr. Rahman Ullah S/o Sher Bahadur, (CHW)	Central Prison D.I.Khan

sd  
DEPUTY DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

M. J. Kar



P-2-

INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

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<https://www.facebook.com/kpkprisons>  
prisonsig@gmail.com

No. \_\_\_\_\_  
Dated. 21-10-2022

Endst; No. 36801-521-WE

Copy of the above along with a copy of the:

1. All Superintendents Jails/Internment Centres concerned for information and necessary action.
  2. Office Accountant Inspectorate General of Prisons Peshawar for information and necessary action.
- They are directed that the nominated officials may be relieved on 04-11-2022 AN with the direction to report to Commandant PSTA Haripur on or before 07-11-2022 positively for the subject cited promotion course and also bring with them essential uniforms, bedding /other requisite of daily use for official use of the Academy as described. Letter of Commandant PSTA Haripur referred to above is also enclosed for ready reference.
3. Superintendent District Jail Hangu for information. He is directed to relieve Muhammad Tanveer G Assistant (BPS-16) on 01-11-2022 with direction to report to Superintendent District Jail Kohat for temporary duty till further orders.
  4. Superintendent Central Prison Peshawar for information. He is directed to relieve Mr. Rasheed Ahmad Senior Clerk (BPS-14) on 01-11-2022 with the direction to report to Superintendent Sub Jail Jamrud for temporary duty till arrival of Mr. Saeed Raza, Senior Clerk from training.
  5. Superintendent Sub jail Battagram for information. He is directed to relieve Muhammad Taimur Mughal Senior Clerk (BPS-14) on 01-11-2022 with direction to report to Superintendent Sub Jail Dassu (Kohistan) for temporary duty till arrival of Hayat Ur Rehman, Senior Clerk from training.
  6. PS to Special Assistant to Chief Minister for Prisons Khyber Pakhtunkhwa Peshawar for information.

DEPT. DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

DS/BO/HC

ATTESTED

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*[Handwritten signature]*

*[Handwritten signature]*

To,

The Secretary to Govt; of Khyber Pakhtunkhwa,  
Home & TAs Department, Peshawar

D-26

Subject:-

Departmental appeal for Enhancement of Promotion quota allocated for Assistant Superintendant Jail in Inspector General of Prisons, Khyber Pakhtunkhwa similarly to the other employees who 75% quota for promotion in the same department

R/Sir,

With due respect, the following few lines are submitted for your kind consideration:

- i. That the applicant is the employee of Prison Department and is serving as Chief Head Warder (BPS-11) quite efficiently and upto the entire satisfaction of his superiors.
- ii. That the Service Rules of the post of Assistant (BPS-16) vide Notification of Establishment Department bearing No.SOE.IV(E&AD)/1-35/2012, dated 06.12.2012, provides for the promotion quota for Assistant (BS-16) at 75% while for initial recruitment @ 25%. **(Flag-A)**
- iii. That the Service Rules for Directorate of Reclamation and Probation issued by Home and Tribal Affairs Department Khyber Pakhtunkhwa vide Notification No. SO(P&R)/1-8/2017 dated 04.10.2017, has fixed the promotion quota for the Assistant (BS-16) is 75% and 25% for initial recruitment. **(Flag-B)**
- iv. That the Service Rules for Inspectorate of Prisons, issued by Home & Tribal Affairs Department, Khyber Pakhtunkhwa vide Notification No. SO(P&R)/1-33/2021 dated 15.04.2022, has fixed the promotion quota for the Assistant (BS-16) at S.No. (35), is 75% and 25% for initial recruitment. **(Flag-C)**
- v. That while, the Khyber Pakhtunkhwa Police Act, 2017 in Chapter IV, Section 30 provides 75% quota for the promotion of Inspector (BS-16) and 25% for Fast Track Promotion. **(Flag-D)**
- vi. However, the Home & Tribal Affairs Department, Khyber Pakhtunkhwa vide same Notification at (Flag-C), at S.No.(5) Column No.6 allocated the Promotion quota for Assistant Superintendant Jail (BS-16) on @ 30% and as such ten percent promotion quota has been allocated for Senior Clerks to the post of Assistant Superintendant Jail (BS-16) while the post of Senior Clerk is totally different category/cadre from the category/cadre of the applicant.
- vii. That it is pertinent to mention here that the post of Senior Clerk is belonging to the clerical cadre in nature and they have no right to be promoted to the post of Assistant Superintendant Jail (BPS-16) which is the sole right of the Uniform employees, therefore, the 10% quota allocated for the post of Senior Clerk is against the law and the same is liable to be modified/rectified.

ATTESTED

M. J.

viii. That it is also pertinent to mention that the 75% promotion quota has already been allocated for the cadre of senior clerk to the post of Assistant/Accountant (BPS-16) at Serial No.35 column-6 of the Service Rules.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned service rules notified on 15.04.2022 may very kindly be modified/rectified to the extent of enhancement of 30% quota allocated for promotion of Chief Head Warder (BPS-11) to the post of Assistant Superintendent Jail (BPS-16) similarly to the other cadres in the same department who have 75% quota for promotion to the next higher scale and the 10% quota of Senior Clerks for promotion to the post of Assistant Superintendent Jail (BPS-16) be removed allocated in the category of the applicant. Any other relief which your good self deems fit that may also be awarded in favor of the applicant.

Dated: 22.08.2022.

Sincerely yours,  
Dad Muhammad Khan, Chief Head Warder,  
Central Jail, Peshawar

ATTESTED  
*[Signature]*

WAKALAT NAMA

BEFORE THE Khyber Pakhtunkhwa Service Tribunal  
Peshawar

OF 2022

Dad Muhammad

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Govt. of KP & Others

(RESPONDENT)  
(DEFENDANT)

I/We Dad Muhammad

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, High Court, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_/\_\_\_/2022

Dad Muhammad  
CLIENT

MIR ZAMAN SAFI  
ACCEPTED  
MIR ZAMAN SAFI  
ADVOCATE

OFFICE:

Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.

Mobile No.0333-9991564

0317-9743003