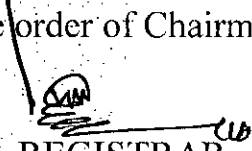


FORM OF ORDER SHEET

Court of _____

Case No.- 1781 /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 of 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. 1781 /2022

MUHAMMAD ABID HUSSAIN
VS
GOVT. OF KP & OTHERS

INDEX

S. NO	<u>DOCUMENTS</u>	<u>ANNEXURE</u>	<u>PAGE</u>
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2	Seniority list	A	6 - 9.
3	Service Rules	B	10 - 22.
4	Letter	C	23 - 24.
5	Departmental appeal	D	25 - 26.
6	Wakalat Nama	-----	27.

APPELLANT

Through:


MIR ZAMAN SAFI

Office: Room No. 6-E, 5th Floor,
Rahim Medical Centre, Hashtnagri,
Peshawar.

Cell: 0333-9991564

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

APPEAL NO. 1781 /2022

Mr. Muhammad Abid Hussain, Head Warden (BPS-09),
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
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 Superintendent 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:
ON FACTS:**

- 1- That the appellant was appointed as Warder in the Prison Department on 27.12.1995. 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 Superintendent 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 Superintendent Jail; and*
 - (ii) *Clearance of mandatory departmental examination prescribed for Assistant Superintendent 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 Superintendent Jail; and*
 - (ii) *Clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail". Copy of the Notification/Service Rules & letter for mandatory promotion course are attached as annexureB & 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 Superintendent 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

MUHAMMAD ABID HUSSAIN

Through:

MIR ZAMAN SAFI
Advocate, High Court,
Peshawar

CERTIFICATE:

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

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


M. ABID HUSSAIN

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 HEAD WARDERS (BPS-09) (MALE) OF KHYBER PAKHTUNKHWA PRISONS DEPARTMENT AS STOOD ON 01-10-2022.
Sanctioned Strength of Head Warder (BPS-09) = 414, present = 409, vacant = 05

A-6

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PB	Name with parentage	Domicile	DOB	Qualifi- Cation	DOA	DOP to H/Warder	Departmental Exam Chief Warders	Promotion Training of Head Warder for Chief Warder	Remarks
1.	Saidul Zaman S-o Gul Shad On LPR HQ Mardan 2879-83 dt; 9-6-2022	Swabi	13-Apr-1963	Primary	22-Mar-1982	24-Mar-2001	Not appeared	Completed	<p>1. Official at S# 1, 2 & 8 were superseded in last DPC dated 30-07-2021 to CHW due to non-possessing of required qualification.</p> <p>2. Official at S#6 was superseded in last DPC, as he submitted refusal from promotion.</p> <p>3. Officials at S# 3, 4, 5, 9 & 13 was deferred in last DPC to CHW dated 30-07-2021 due to deficiencies and posts kept reserved.</p> <p>4. Official at S#10 & 12 is unwilling for promotion and submitted written consent</p> <p>5. Official at S# 11 was deferred the last DPC, now on promotion his seniority over junior colleagues retained.</p>
2.	Zamarud Khan S-o Saleem Khan	Swabi	1-Jan-1965	Primary	24-Dec-1983	18-May-2009	Not appeared	Completed	
3.	Asmatullah s-o Gul Muhammad	D.I.Khan	4-Apr-1967	Middle	18-Apr-1984	8-Feb-2012	Passed	Completed	
4.	Amjid Ali s-o Mir Hashim	Mardan	1-Apr-1970	Middle	3-Jan-1988	17-Jun-2013	Passed	Completed	
5.	Muhammad Fareed S-o M. Ashraf	Haripur	4-Feb-1966	Middle	11-Aug-1988	15-May-2014	Passed	Completed	
6.	Liaqat Ali s-o Khybar Khan	Swabi	1-May-1964	Middle	22-Sep-1988	17-Jun-2013	Passed	Completed	
7.	Shah Said s-o Hazrat Said	Mardan	1-Jan-1966	Primary	15-Oct-1989	29-Oct-2014	Passed	Completed	
8.	Anwar Ali S-o Jaipur Khan	Mardan	3-Mar-1968	9 th	16-Feb-1990	15-May-2014	Not Cleared	Completed	
9.	Muhammad Zakria s-o Iqbal Shah	Charsadda	1-Jul-1970	Matric	26-Aug-1990	29-Oct-2014	Passed	Completed	
10.	Inayat Rehman S-o Saleh Rehman	Mardan	4-Jan-1971	Matric	16-Oct-1990	30-Nov-2014	Passed	Completed	
11.	Muhammad Akbar Khan S/O Muhammad Ismail Khan	D.I.Khan	1/Sep/1966	Matric	26-Nov-1990	20/5/2022	Not cleared	Not Undergone	
12.	Muhamamd Khan s-o Babuzai	Dir (U)	1-Jan-1967	Middle	06-May-1991	15-May-2014	Not Appeared	Not Undergone	
13.	Asadullah s-o Fida Muhammad	Charsadda	4-Jan-1971	Matric	16-Jun-1991	11-Jun-2014	Not Appeared	Not Undergone	
14.	Syed Muslim Shah S/o Syed Younas Shah	Nowshera	3-Oct-1973	Matric	22-Aug-1994	27-Dec-2016	Passed	Completed	
15.	Hijabullah S/o Abdul Rasheed	Swabi	10-Feb-1976	F.A	25-Dec-1994	27-Dec-2016	Passed	Completed	
16.	Riaz Muhammad S/o Muhammad Afzal	Swabi	6-Apr-1971	Matric	28-Jan-1995	27-Dec-2016	Passed	Completed	

PB	Name with parentage	Domicile	DOB	Qualification	DOA	DOP to H/Warder	Departmental Exam Chief Warders	Promotion Training of Head Warder for Chief Warder	Remarks
17.	Sadarat Khan S/o Arsala Khan	Nowhera	15-May-1969	Matric	24-Jul-1995	27-Dec-2016	Passed	Completed	
18.	Muhammad Abid Hussain S/o Khadim Hussain	Peshawar	5-Oct-1973	Matric	7-Aug-1995	27-Dec-2016	Passed	Completed	
19.	Rasheed Khan S/o Fazal Khan	Charsadda	5-Jan-1974	Matric	27-Aug-1995	27-Dec-2016	Passed	Not Undergone	
20.	Ali Akbar S/o Muhammad Israel	Charsadda	11-Sep-1974	Matric	30-Aug-1995	27-Dec-2016	Passed	Not undergone	
21.	Muhammad Khalid S/o Fazal Muhammad	Peshawar	7-Apr-1970	B.A	26-Oct-1995	27-Dec-2016	Passed	Not Undergone	
22.	Amjid Ali S/o Umar Ali	Charsadda	1-Feb-1973	Matric	26-Oct-1995	27-Dec-2016	Passed	Completed	
23.	Muhammad Naseer S/o Shahzad Gul	Peshawar	5-Feb-1975	Matric	16-Nov-1995	27-Dec-2016	Passed	Not Undergone	
24.	Shah Zarin S/o Kachkol	Swabi	27-Mar-1970	Matric	15-Jan-1996	27-Dec-2016	Passed	Not Undergone	
25.	Liaqat Ali S/o Mir Alam	Charsadda	13-Aug-1975	Middle	22-Jan-1996	28-Feb-2020	Passed	Not Undergone	
26.	Nadeem Khan S/o Abdul Qayum Khan	Peshawar	2-Apr-1971	Matric	29-Feb-1996	27-Dec-2016	Passed	Not Undergone	
27.	Muhammad Rasheed s-o Nazir Dad	Karak	1-Oct-1975	Matric	13-May-1996	28-May-2015	Not cleared	Not Undergone	
28.	Muhammad Yaqoob Khan S/o Muhammad Raheem	Mardan	20-Mar-1970	Maric	18-Jun-1996	27-Dec-2016	Not cleared	Not Undergone	
29.	Naveed Ali Shah S/o Abid Ali Shah	Peshawar	13-Dec-1975	Matric	3-Nov-1996	12-Jan-2017	Not cleared	Not Undergone	
30.	Raham Dad Khan s/o Pir Muhammad	Peshawar	27-Jun-1976	Matric	3-Nov-1996	28-May-2015	Not cleared	Not Undergone	
31.	Shah Faisal s-o Karim Khan	Peshawar	1-Jan-1976	Matric	7-Nov-1996	28-May-2015	Not cleared	Not Undergone	
32.	Muhammad Umar s-o Abdul Qadir	Peshawar	28-Mar-1972	B.A	15-Nov-1996	28-May-2015	Not cleared	Not Undergone	
33.	Azizullah S/o Amin ullah	Mohmand	1-Sep-1975	F.A	25-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	
34.	Abdul Hayat S/o Waseel Khan	Bannu	25-Nov-1974	Matric	26-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	
35.	Mukhtiar Ahmad S/o Haji Rahim Bakhsh	D.I.Khan	12-Mar-1977	Matric	27-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	
36.	Zarwali Khan S/o Sifat Khan	Lakki Marwat	3-Aug-1977	Matric	27-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	
37.	Afsar Khan S/o Atlas Khan	Charsadda	3-Apr-1972	Middle	29-Sep-1997	28-Feb-2020	Not cleared	Not Undergone	
38.	Sultan Muhammad S/o Ghulam Muhammad	Lakki Marwat	9-Feb-1977	FA	29-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	

PB	Name with parentage	Domicile	DOB	Qualification	DOA	DOP to H/Warder	Departmental Exam Chief Warders	Promotion Training of Head Warder for Chief Warder	Remarks
387.	Farooq Niaz Khan S/O Falak Naz	Bannu	20/Mar/1980	F.A	5-Oct-2007	05-10-2022	Not cleared	Not Undergone	/
388.	Abdur Raziq S/O Gul Zarin Shah	Malakand	18/Feb/1987	F.A	5-Oct-2007	05-10-2022	Not cleared	Not Undergone	
389.	Muhammad Sajid S/O Muhammad Gulzar	Abbottabad	6/Mar/1988	Matric	5-Oct-2007	05-10-2022	Not cleared	Not Undergone	
390.	Andaz Ali S/O Azad Khan	Bannu	14/Apr/1973	F.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
391.	Muhammad Asif S/O Ajmu ud Din	D.I.Khan	1/Feb/1978	Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
392.	Ihsan Ullah S/O Bostan Khan	Bannu	20/Sep/1978	Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
393.	Shabaz Khan S/O Faizullah Khan	Bannu	8/Mar/1979	SSC	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
394.	Muhammad Fahim S/O Bashir Ud Din	D.I.Khan	1/Jan/1980	M.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
395.	Noor Islam Khan S/O Mir Aslam Khan	Bannu	8/Mar/1980	Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
396.	Hayat Ullah S/O Shah Jehan	Charsadda	14/May/1982	F.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
397.	Farman S/O Sher Wali Khan	Bannu	12/Jan/1984	Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
398.	Hamid Muhammad S/O Din Muhammad	Bannu	21/May/1984	M.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
399.	Ihsan Ullah Khan S/O Muhammad Tariq Khan	Bannu	2/Jun/1984	F.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
400.	Ibrar Khan S/O Hayat Ullah Khan	Bannu	9/Apr/1985	Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
401.	Barkat Ullah khan S/O Nasrullah Khan	Bannu	5/Apr/1986	Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	

PB	Name with parentage	Domicile	DOB	Qualification	DOA	DOP to H/Warder	Departmental Exam Chief Warders	Promotion Training of Head Warder for Chief Warder	Remarks
402.	Waheed ullah Khan S/O Sher Daud Khan	Bannu	22/Apr/1986	BA	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
403.	Asif Ali Shah S/O Tahir Ali Shah	Bannu	7/Jul/1987	F.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
404.	Muhammad Ayaz S/O Mirqad Ayaz	Bannu	5/Feb/1989	M.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
405.	Suliman Shah S/O Karim Khan	Charsadda	7/Jan/1979	M.A	7-Oct-2007	05-10-2022	Not cleared	Not Undergone	
406.	Waheed Ullah Shah S/O Amar Ali Shah	Bannu	18/Apr/1984	Matric	7-Oct-2007	05-10-2022	Not cleared	Not Undergone	
407.	Noor Muhammad S/O Dost Muhammad	Charsadda	6/Feb/1985	Matric	7-Oct-2007	05-10-2022	Not cleared	Not Undergone	
408.	Shakeel Ahmad s-o Yousaf Khan	Nowshera	14-Jul-1979	Matric	6-Apr-2009	10-May-2012	Not cleared	Not Undergone	
409.	Shakeel Khan S-O Madad Khan	Peshawar	8-Dec-1985	Matric	6-Apr-2009	10-May-2012	Not cleared	Not Undergone	

No. _____

dated : _____

SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

Copy of the above is forwarded to the:-

1. Inspector General of Prisons Khyber Pakhtunkhwa Peshawar.
2. Superintendent Headquarters Prison D.I Khan, Mardan and Haripur.
3. Superintendent Jail / Interment Center concerned for information and further necessary action.

SUPERINTENDENT
HEADQUARTERS PRISON PESHAWAR

15

GOVERNMENT OF KHYBER PAKHTUNKHWA HOME AND TRIBAL AFFAIRS DEPARTMENT

NOTIFICATION

Peshawar, dated the 15TH 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 (Prisons & Regulation)
Govt. of Khyber Pakhtunkhwa
Home & Tribal Affairs Department

TESTED

M. J. Khan

APPENDIX.

UPPER EXECUTIVE STAFF

1 SERIAL NO	2 NOMENCLATURE OF POST	3 MINIMUM QUALIFICATION FOR APPOINTMENT BY INITIAL RECRUITMENT OR BY TRANSFER	4 MINIMUM QUA LIFICATION 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>Note: 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>Note: 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>

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Deputy Secretary
HOME & LAND

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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>Note: 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) Physical standard:</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>Note: 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>

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5.	Assistant Superintendent Jail (BPS-16)	<p>(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University; and</p> <p>(b) Physical standard:</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) 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-</p> <p>(i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail;</p> <p>(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-</p> <p>(i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and</p> <p>(c) sixty percent by initial recruitment.</p>
6.	Assistant Superintendent Jail (Female)(BPS-16)	<p>(a) At least Second class Bachelor's Degree or its equivalent qualification from a recognized University; and</p> <p>(b) Physical standard:</p> <p>(i) height 5 feet & 01 inch;</p> <p>(ii) Vision of eyes 6/6 without glasses; and</p> <p>(iii). Free from any kind of disability.</p>		21 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 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-</p> <p>(i) successful completion of promotion course prescribed for Assistant Superintendent Jail; and</p> <p>(ii) clearance of mandatory departmental examination prescribed for Assistant Superintendent Jail; and</p> <p>(b) seventy-five percent by initial recruitment;</p>

Deputy Secretary
Govt of Punjab
Home & Public

Page 4

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WATCH AND WARD STAFF

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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. Note: 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. Note: Head Warders (Female), who possess Middle pass qualification, are exempted from condition of clause(b) above.

Deputy Secretary (I) Population
Govt of Punjab
Home & Public Works

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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 Warder (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 Warder. (b) Clearance of Departmental Professional Examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4. Note: Warders appointed prior to 04-11-2002, are exempted from condition of clause(b) above;

Deputy Secretary (General Services)
Govt. of Jammu & Kashmir
Home & Internal Affairs Department

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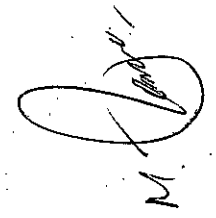
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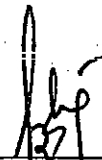
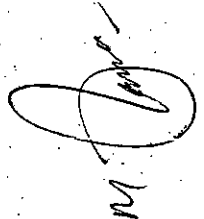
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11.	Head Warder (Female) (BPS-09)	---	(a) Middle passed for those officials who were appointed prior to 04.11.2002; and (b) Secondary School Certificate or its equivalent qualification from a recognized Board for those officials who were appointed, on or after 04.11.2002	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of 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. Note: Female Warders, appointed prior to 04-11-2002 are exempted from condition of clause (b), above.

Deputy Secretary, Government of Punjab
Home & Tribal Affairs

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12.	Warder (BPS-07)	<p>For fresh candidates.</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: 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-Paramilitary 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>For Ex-Uniform Personnel of Pakistan Armed Forces/Para-military forces.</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>Note: 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>			<p style="text-align: center;">ATTENDED</p> 

Deputy Secretary (Personnel)
 Govt. of Punjab
 Lahore

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13.	Warder (Female) (BPS-07)	(a) At least Secondary School certificate in Second division or its equivalent qualification from recognized Board; and. (b) Physical Standard: (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.

MEDICAL & PARAMEDICAL STAFF

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.

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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 Senior Technicians with at least two 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 Technicians , with at least five 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 Junior Technicians , 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 (Health) Government of Khyber Pakhtunkhwa
 Home & Medical

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 13/08/2021
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MINISTERIAL STAFF

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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. Note:- 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. Note:- 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. Note: 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.

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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:</p> <p>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:</p> <p>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:</p> <p>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&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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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.

Deputy Commissioner
Government of Punjab
Home Department

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OFFICE OF THE
COMMANDANT
PRISONS STAFF TRAINING
ACADEMY (PSTA) HARIPUR
Fax: 0998-020067 Phone: 098-020068
psta.haripur@gmail.com

No. 847 Dated 18/10/2022

C-23

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 Enclt 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/harrucks) 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 Warden/Senior Clerk to Assistant Superintendent Jail	02 Months	30	07.11.2022	09.01.2023
2	Basic Training Course (Dutch-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	لوہنگ سوٹ بدم، پی کی سوز	2	اوپر (تولا)
3	لوہی بیچ سون	4	نام پلیٹ، (کالا سادہ)
5	پاسپان سادہ	6	پینٹ (سبڈ)
7	پینٹ (سادہ) خاکسی + 06 جیبوں والی نہ بو۔	8	سٹوٹ (کالا سادہ)
9	بوٹ (کالا رنگ)	10	بوٹ (کالا)
11	جواب تھلا	12	پینٹ (سبڈ) سرخانہ سبڈ

Moreover, Trainers are of utmost importance for imparting of any type of training or workshop etc. The academy did not have its own trainers for delivering lecture and presentations. 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 ATTESTED

(Signature)



INSPECTORATE GENERAL OF
KHYBER PAKHTUNKHWA PESHAWAR
091-9210334, 9210405 091-9213445
https://www.facebook.com/kipkprisons
prisonslg@gmail.com

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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

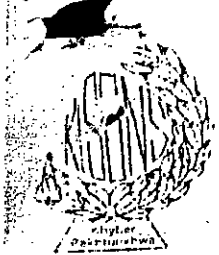
Memo: I am directed to refer to your letter No. 847 dated 18-10-2022 on the subject and to state that the following Senior Clerks (BPS-14) and Chief Head Warders (BPS-11) are hereby nominated for the subject cited course, please:

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. Hameesh Gul S/o Lehaz 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

ATTESTED

(Signature)



P-2-

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445
<https://www.facebook.com/kpkprisons>
prisonsig@gmail.com

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No. _____
Dated. 21-10-2022

Endst; No. 36801-521-WE

Copy of the above alongwith a copy of the:

- All Superintendents Jails/Internment Centres concerned for information and necessary action.
 - 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.
- 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.
 - 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.
 - 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.
 - PS to Special Assistant to Chief Minister for Prisons Khyber Pakhtunkhwa Peshawar for information.

DEPUTY DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

DS/BO/HC

ATTESTED

[Signature]

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To,

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

D-25

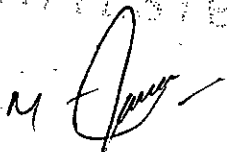
Subject:-

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 Head Warder (BPS-09) 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


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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.

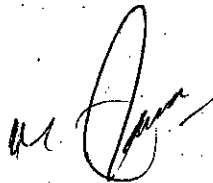
It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned service rules notified on 15.04.2022 may very kindly be modified/rectified to the extent of enhancement of 30% quota allocated for promotion of Chief Head Warder (BPS-11) to the post of Assistant Superintendent 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,

Muhammad Abid Hussain, Head Warder,
Central Jail, Peshawar

ATTESTED



WAKALAT NAMA

BEFORE THE Khyber Pakhtunkhwa Service
Tribunal, Peshawar

OF 2022

M. Abid Hassain

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt. of KP & others

(RESPONDENT)
(DEFENDANT)

I/We Muhammad Abid Hassain

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



CLIENT


ACCEPTED
MIR ZAMAN SAFI
ADVOCATE

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