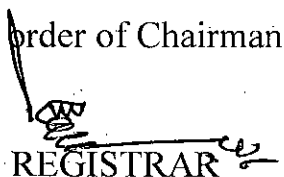


# FORM OF ORDER SHEET

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

Case No.- 1783/2022

| 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><br/>REGISTRAR</p> |

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

APPEAL NO. 1783 /2022

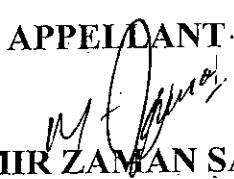
**USMAN KHAN**  
**VS**  
**GOVT. OF KP & OTHERS**

**INDEX**

| <b>S. NO</b> | <b><u>DOCUMENTS</u></b>                    | <b><u>ANNEXURE</u></b> | <b><u>PAGE</u></b> |
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| 6            | Wakalat Nama                               | -----                  | 27.                |

**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. 1783 /2022

Mr. Usman Khan, Head Warder (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 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 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 11.12.1997. That during service the appellant has got promotion to the rank of Head Warder and subsequently promoted to the rank of Chief Head Warder (BPS-11). 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 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 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.

**GRUNDS:**

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.

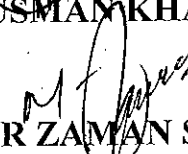
- F- That according to Article-38 (e) of the Constitution of Pakistan 1973, the State is bound to reduce disparity in the income and earnings of individuals including persons in the services of the Federation. That in light of the mentioned Article the appellant is on strong footing.
- G- That the respondents 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  
  
USMAN KHAN

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


USMAN KHAN

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**

13

A-6

| 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  |
|-----|---|-----------|-------------|-----------------|-------------|-----------------|---------------------------------|--|--|
| 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 &amp; 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 &amp; 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 &amp; 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 <sup>th</sup> | 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 |
|-----|--|--------------|-------------|---------------|-------------|-----------------|---------------------------------|--|---------|
| 62  | Usman Marwat S/o M. Nawaz Khan         | Bannu        | 8-Jan-1973  | Matric        | 11-Dec-1997 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 63. | Imam Bakhsh S/o Allah Wasaya           | D.I.Khan     | 15-Apr-1972 | Matric        | 12-Dec-1997 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 64. | Muhammad Saleem S/o Fateh Khan         | Mardan       | 24-Mar-1978 | Matric        | 2-Jan-1998  | 17-Oct-2017     | Passed                          | Not Undergone                                      |         |
| 65. | Wali Ayaz S/o Muhammad Azam            | Bannu        | 12-May-1978 | Matric        | 7-Jan-1998  | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 66. | Zahid Rahman S/o Saifur Rahman         | Haripur      | 4-Apr-1976  | Matric        | 10-Jan-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 67. | Iftikhar Shaikh so Abdul Ghafar Shaikh | D.I.Khan     | 1-May-1975  | F.A           | 12-Jan-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 68. | Muhammad Ramzan S/o Muhammad Bakhsh    | D.I.Khan     | 11-Sep-1977 | Matric        | 13-Jan-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 69. | Muhammad Javed S/o Saida Gul           | Mohmand      | 13-Apr-1979 | Matric        | 13-Jan-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 70. | Muhammad Saleem S/o Rab Nawaz          | D.I.Khan     | 15-Jan-1978 | FA            | 17-Jan-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 71. | Khaliq Jan S/o Hukum Jan               | Karak        | 12-Mar-1974 | Matric        | 22-Jan-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 72. | Ihsanullah S/o Saadullah               | Lakki Marwat | 2-Jun-1977  | FA            | 4-Feb-1998  | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 73. | Qayum Nawaz S/o Hafiz Ghulam Hussain   | D.I.Khan     | 13-Feb-1974 | M.A           | 6-Feb-1998  | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 74. | Ibrar S/o Fazal Rahman                 | Kohat        | 28-Jun-1974 | Matric        | 11-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 75. | Muhammad Ayaz S/o Muhammad Haleem      | Lakki Marwat | 1-May-1974  | F.A           | 16-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 76. | Mir Qad Ayaz S/o Gul Muhammad Khan     | Bannu        | 17-Apr-1979 | Matric        | 18-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 77. | Qayum Khan S/o Muhammad Sher Khan      | Dir Upper    | 4-Jun-1974  | Matric        | 21-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 78. | Asfandyar S/o Ahmad                    | Dir Lower    | 1-Jun-1977  | Matric        | 21-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 79. | Muhammad Zareef S/o Lal Mir            | Bannu        | 3-Jan-1978  | Matric        | 23-Feb-1998 | 28-Feb-2020     | Not cleared                     | Not Undergone                                      |         |
| 80. | Khani Mula S/o Sher Zamin              | Malakand     | 30-Jun-1975 | Middle Pass   | 27-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 81. | Umar Khitab S/o umar Daraz             | D.I.Khan     | 5-Jun-1975  | Matric        | 28-Feb-1998 | 17-Oct-2017     | Not cleared                     | Not Undergone                                      |         |
| 82. | Fazal Subhan S/o Fazal Ahad            | Dir (Lower)  | 5-Jan-1976  | F.A           | 1-Mar-1998  | 17-Oct-2017     | 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 : \_\_\_\_\_

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

**SUPERINTENDENT**  
HEADQUARTERS PRISON PESHAWAR

RECEIVED  
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:

60

**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

RECEIVED  
15 APR 2022

APPENDIX

UPPER EXECUTIVE STAFF

| 1<br>SERIAL<br>NO | 2<br>NOMENCLATURE OF<br>POST  | 3<br>MINIMUM QUALIFICATION<br>FOR APPOINTMENT BY<br>INITIAL RECRUITMENT OR<br>BY TRANSFER | 4<br>MINIMUM QUA<br>LIFICATION<br>PRESCRIBED<br>FOR<br>PROMOTION | 5<br>AGE LIMIT | 6<br>METHOD OF RECRUITMENT  |
|-------------------|---|---|--|----------------|---|
| 1.                | Inspector General Prisons<br>(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> |

Deputy Secretary (Prisons)

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|----|--|--|---|----------------|---|
| 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> |

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| 1  | 2  | 3   | 4 | 5              | 6  |
|----|--|---|---|----------------|--|
| 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 &amp; 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>   |

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**WATCH AND WARD STAFF**

| 1  | 2                                     | 3   | 4   | 5 | 6   |
|----|---------------------------------------|-----|---|---|---|
| 7. | Chief Head Warder<br>(BPS-11)         | --- | (a) Middle passed for those officials who were appointed prior to 04.11.2002; and<br><br>(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-<br>(a) successful completion of promotion course prescribed for Chief Head Warder;<br>(b) clearance of Departmental Professional Examination prescribed in their own cadre; and<br>(c) Possess minimum qualification as specified in column No.4.<br><br><b>Note:</b> Head Warders, who possess Middle pass qualification, are exempted from condition of clause (b) above.                           |
| 8. | Chief Head Warder<br>(Female)(BPS-11) | --- | (a) Middle passed for those officials who were appointed prior to 04.11.2002; and<br><br>(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-<br>(a) successful completion of promotion course prescribed for Chief Head Warder (Female);<br>(b) clearance of departmental professional examination prescribed in their own cadre; and<br>(c) Possess minimum qualification as specified in column No.4.<br><br><b>Note:</b> Head Warders (Female), who possess Middle pass qualification, are exempted from condition of clause(b) above; |

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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<br><br>(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<br><br>(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-<br>(a) successful completion of promotion course prescribed for Head Warder.<br>(b) Clearance of Departmental Professional Examination prescribed in their own cadre; and<br>(c) Possess minimum qualification as specified in column No.4.<br><br><b>Note:</b> Warders appointed prior to 04-11-2002, are exempted from condition of clause(b) above; |

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|-----|----------------------------------|-----|--|---|--|
| 11. | Head Warden (Female)<br>(BPS-09) | --- | (a) Middle passed for those officials who were appointed prior to 04.11.2002; and<br><br>(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-<br><br>(a) successful completion of promotion course prescribed for Head Warden Female;<br>(b) clearance of Departmental Professional Examination prescribed in their own cadre; and<br>(c) possess minimum qualification as specified in column No.4.<br><br><b>Note:</b> Female Warders, appointed prior to 04-11-2002 are exempted from condition of clause (b), above. |

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Govt of Punjab  
Home & Tribal Affairs

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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: 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><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> |  |   |  |

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

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| 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 at least three years' service as such; and<br>(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<br>(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        | ---  | y  | ---            | By transfer from Health Department.  |

Deputy Secretary (Chief) Government of Khyber Pakhtunkhwa  
Home & Tribal Affairs

GOVERNMENT OF KHYBER PAKHTUNKHWA

**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:<br>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.<br><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/<br>Budget and Accounts<br>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.<br><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<br>(BPS-16)                          | At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University. |   | 20 to 32<br>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.<br><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<br><br>(b) Twenty- five percent by initial recruitment*: |
| 36. | Senior Clerk/ Assistant<br>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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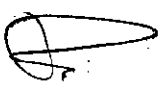
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|   |    |                       |     |   |  |                |  |
|---|----|-----------------------|-----|---|--|----------------|--|
| 1 | 37 | Junior Clerk (BPS-11) | (a) | PA/F.Sc with Second Division or its equivalent qualification from a recognized Board; and (b) a speed of thirty (30) words per minute in typing in English on computer. | 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, Bahisht/Water Carriers, Photostat Machine Operators, Plumbers, Malls, Engine Men, Dhobis, Chowkidas, 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/R.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&amp;D)/1-35/2014, dated 18-07-2019, to the existing matriculate incumbents of the posts of Restorer, Naib Qasid, Bahisht / Water Carrier, Photostat Machine Operator, Tubewell Operator, Plumber, Mall, Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper, including holders of other equivalent posts, for promotion to the post of Junior Clerk.</p> <p>Note: For the purpose of promotion, there shall be maintained a joint seniority list of Restorer, Naib Qasid, Bahisht/Water Carrier, Photostat Machine Operator, Tubewell Operator, Plumber, Mall, 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> |
| 2 |    |                       |     |   |  |                |  |
| 3 |    |                       |     |   |  |                |  |
| 4 |    |                       |     |   |  |                |  |
| 5 |    |                       |     |   |  |                |  |
| 6 |    |                       |     |   |  |                |  |

*[Handwritten Signature]*



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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.         |

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Govt. of Punjab  
Home & Industries

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OFFICE OF THE  
COMMANDANT  
PRISONS STAFF TRAINING  
ACADEMY (PSTA) HARIPUR  
Fax: 0998-920067 Ph: 0998-920068  
psta@psta.gov.pk

No. 847 Dated 17/10/2022

C-23

The Inspector General of Prisons,  
Khyber Pakhtunkhwa Peshawar.

Subject: ARRANGEMENT OF MANDATORY PROMOTION COURSE FOR ASSISTANT SUPERINTENDENT JAIL

R-Str.

Please refer your letter No. 34471 dated 10/10/2022 and letter Endet No. 34470 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 Warden/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  | ٹریڈنگ سوٹ بدمہ ہی ٹی شور | 2  | ٹریڈنگ (نیلا)                 |
| 3  | ٹریڈنگ بیچ سیٹ            | 4  | ٹیم پلیٹ (کالا سادہ)          |
| 5  | پانسہ سادہ                | 6  | بیڈ شیٹ (سفید)                |
| 7  | OG + خاکس + سادہ          | 8  | شوٹ (کالا سادہ)               |
| 9  | بوٹا (کالا رنگ)           | 10 | بوٹا (کالا)                   |
| 11 | جواب نیلا                 | 12 | بیڈ شیٹ (سارو) سر خانہ مستقرہ |

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 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/<br>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

ATTESTED  
[Signature]

217036



INSPECTORATE GENERAL OF  
KHYBER PAKHTUNKHWA PESHAWAR  
091-9210334, 9210408 091-9213445  
https://www.facebook.com/ikpkprisons  
prisonslg@gmail.com

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 Dassi Kohistan       |
| 8.  | Mr. Hameesh Gul S/o Lehad 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      |

DEPUTY DIRECTOR  
INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

ATTESTED

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(29AD)



P-2-

INSPECTORATE GENERAL OF PRISONS  
KHYBER PAKHTUNKHWA PESHAWAR

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

No. \_\_\_\_\_

Dated. 21-10-2022

Endst; No. 36801-SR1-WF

Copy of the above alongwith 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 Gilani 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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D-25

To,

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

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

M. [Signature]


(26)

- 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.

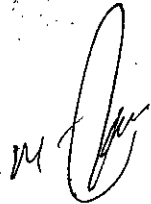
It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned service rules notified on 15.04.2022 may very kindly be modified/rectified to the extent of enhancement of 30% quota allocated for promotion of Chief Head Warder (BPS-11) to the post of Assistant Superintendent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

  
Usman Khan, Head Warder,  
Central Jail, Peshawar

ATTESTED



**VAKALATNAMA**

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

\_\_\_\_\_ OF 2022

Usman Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Govt: of KP & Others

(RESPONDENT)  
(DEFENDANT)

I/We Usman Khan

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, 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

Usman Khan  
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.0323-9295295  
0317-9743003