### FORM OF ORDER SHEET

Court of						•
C N-			 	1	_Q.	/n.o.o.n
Case No	•	•	 		<u> 80/</u>	2022

	Case	e No 788/2022	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge	
1	2	3	
1-	12/12/2022	The appeal presented today by Mr. Mir Zar Safi Advocate. It is fixed for preliminary hearing bet	
		Single Bench at Peshawar on Notices be issued	
	-	appellant and his counsel for the date fixed.	
	• •	By the order of Chairman	
		REGISTRAR	
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# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

APPEAL NO. 1788

#### SHAUKAT ALI KHAN VS GOVT. OF KP & OTHERS

INDEX

S. NO	DOCUMENTS	ANNEXURE	PAGE
-1	Memo of appeal along with stay application		1 - 5.
2	Seniority list	, <b>A</b>	6 -9.
-:3	Service Rules	В	10 – 22.
4	Letter	С	23 - 24.
5	Departmental appeal	D	25 –26.
6	Wakalat Nama		27.

Through:

MIR ZAMAN SAFI

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

Peshawar.

Cell: 0333-9991564

## **PESHAWAR**

VALEYT NO. 17-88 7707/

BELOKE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Central Jail, Peshawar..... APPELLANT Mr. Shaukat Ali Khan, Head Warder (BPS-09),

#### **VERSUS**

Pakhtunkhwa, Peshawar. The Secretary Finance Department, Civil Secretariat, Khyber **-£** Pakhtunkhwa, Peshawar. The Secretary Establishment Department, Civil Secretariat, Khyber Khyber Pakhtunkhwa, Civil Secretariat, Peshawar. The Government of Khyber Pakhtunkhwa through Chief Secretary

The Secretary Govt: of Khyber Pakhtunkhwa, Home & Tribal Affairs

Department, Khyber Pakhtunkhwa, Peshawar.

" KEZLONDENLZ The Inspector General Prisons, Khyber Pakhtunkhwa, Peshawar.

STATUTORY PERIOD OF UINETY DAYS DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE CYDRE AND AGAINST NO ACTION TAKEN ON THE PROMOTION OF SENIOR CLERKS IN THE APPELLANT'S SCALE AND AGAINST THE 10% QUOTA ALLOCATED FOR RESERVED FOR PROMOTION TO THE NEXT HIGHER FOR THE OTHER CADRES 75% QUOTA HAS BEEN IMPUGNED SERVICE RULES DATED 15.04.2022 WHILE ALLOCATED FOR THE CADRE OF APPELLANT IN THE ENHVICEMENT %0€ OE PROMOTION <u>ATOUO</u> PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR APPEAL UNDER SECLION-4  $OE^-$ KHAREK

be awarded in favour of the appellant. other remedy which this august Tribunal deems fit that may also employees and 10% quota of the Senior Clerks be removed. Any 30% quota of the appellant's cadre similarly to the other be directed to amend the impugned Service Rules by enhancing upon the rights of the appellant. That the respondents may kindly declared as Ultra Vires, illegal, unconstitutional and ineffective impugned Service Rules Notified on 15.04.2022 may kindly be Jail (BPSI6) mentioned in Serial No. 5, column No.6 of the promotion of senior elerks to the post of Assistant Superintendant appellant and illegal and unlawful allocation of 10%, quota for tespondents by not enhancing the promotion quota of the cadre of That, on acceptance of this appeal the action and inaction of the PRAYER:

- That the appellant was appointed as Warder in the Prison Department on 01.10.1997. 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 .....
- 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.
- 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.
- That, in the above mentioned service rules/structure the posts of Assistant Superintendant Jail shown at Serial No.5 of the appendix has been given the method of promotion under Column No.6 which is as under:
- (Thirty percent by promotion, on the basis of seniority-cum-fitness (a) 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:-

Successful completion of promotion course prescribed for Assistant **(i)** 

Superintendant Jail; and

- Clearance of mandatory departmental examination prescribed for (ii) Assistant Superintendant Jail;
- Ten percent by promotion, on the basis of senior-cum fitness, from **(b)** 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:-

Successful completion of promotion course prescribed for Assistant *(i)* 

Superintendant Jail; and

- Clearance of mandatory departmental examination prescribed for (ii) Assistant Superintendant Jail". Copy of the Notification/Service Rules & letter for mandatory promotion course are attached as
  - That according to the above mentioned service rules 30% quota for the cadre of the appellant i.e. Head Warder/Chief Head Warder has been allocated for promotion to the post of Assistant Superintendant Jail (BPS-16) while the other cadres have granted 75% quota for promotion to the next higher scale.

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.

Delonging to the Uniform Cadre and the post of Assistant Superintendant Jail (BPS-16) purely falls in the Uniform Cadre and the Linform Cadre and sas such the cadre of Senior Clerk totally different and not related to the cadre of sppellant. 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 Superintendant Jail (BPS-16).

That as per strength of the post of Assistant Superintendant Iail (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.

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.

#### **CKOUNDS:**

- 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 Matural Justice.
- That the impugned Notification dated 15.04.2022 due to which the promotion quots 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 quots of the appellant.

- 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.
- 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.
- 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

Through:

Advocate, High Court,

Peshawar

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

DEPONENT

#### LIST OF BOOKS:

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

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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

SHAUKAT ALI 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 DEPRTMENT AS STOOD ON 01-10-2022.

Sanctioned Strength of Head Warder (BPS-09) = 414, present = 409, vacant = 05



PB		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	1. Official at S# 1, 2 & 8 were superseded in
2.	Zamarud Khan S-o Saleem Khan	Swabi	1-Jan-1965	Primary	24-Dec-1983	18-May-2009	Not appeared	Completed	last DPC dated 30-07-2021to CHW due to non-
3.	Asmatullah s-o Gul Muhammad	D.I.Khan	4-Apr-1967	Middle	18-Apr-1984	8-Feb-2012	Passed	Completed	possessing of . required
4.	Amjid Ali s-o Mir Hashim	Mardan	1-Apr-1970	Middle	3-Jan-1988	17-Jun-2013	Passed	Completed	qualification.
5.	Muhammad Fareed S-o M. Ashraf	Haripur	4-Feb-1966	Middle	11-Aug-1988	15-May-2014	Passed	Completed	2. Official at S#6 was superseded
6.	Liaqat Ali s-o Khybar Khan	Swabi	1-Ma <del>y</del> -1964	Middle	22-Sep-1988	17-Jun-2013	Passed	Completed	in last DPC, as he submitted refusal
7.	Shah Said s-o Hazrat Said	Mardan	1-Jan-1966	Primary	15-Oct-1989	29-Oct-2014	Passed	Completed	from promotion.
8.	Anwar Ali S-o Jaipur Khan	Mardan	3-Mar-1968	9th	16-Feb-1990	15-May-2014	Not Cleared	Completed	3. Officials at S#
9.	Muhammad Zakria s-o Iqbal Shah	Charsadda	1-Jul-1970	Matric	26-Aug-1990	29-Oct-2014	Passed	Completed	3, 4, 5, 9 & 13 was deferred in last DPC to CHW
10.	Inayat Rehman S-o Saleh Rehman	Mardan	4-Jan-1971	Matric	16-Oct-1990	30-Nov-2014	Passed	Completed	dated 30-07-2021 due to deficiencies and
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	posts kept reserved.
12.	Muhamamd Khan s-o Babuzai	Dir (U)	1-Jan-1967	Middle	06-May-1991	15-May-2014	Not Appeared	Not Undergone	4. Official at S#10 & 12 is unwilling for
13.	Asadullah s-o Fida Muhammad	Charsadda	4-Jan-1971	Matric	16-Jun-1991	11-Jun-2014	Not Appeared	Not Undergone	promotion and
14.	Syed Muslim Shah S/o Syed Younas Shah	Nowshera	3-Oct-1973	Matric	22-Aug-1994	27-Dec-2016	Passed	Completed	5. Official at S# 11 was deferred
									the last DPC, not on promotion his
15.	Hijabullah S/o Abdul Rasheed	Swabi	10-Feb-1976	F.A	25-Dec-1994	27-Dec-2016	Passed	Completed	seniority over junior colleague retained.
16	Riaz Muhammad S/o Muhammad Afzal	Swabi	6-Apr-1971	Matric	28-Jan-1995	3 27-Dec-2016	Passed	Completed	-

ATTESTED.

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:	T · · · · · · · · · · · · · · · · · · ·							Promotion	Remarks
РВ	Name with parentage	Domicile		Qualifi- Cation	DOA	DOP to H/Warder	Departmental Exam Chief Warders	Training of Head Warder for Chief Warder	
39./	Mumtaz Ali S/o Abdul Mateen	Mohmand	19-Jul-1977	Matric	30-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	
40.	Muhammad Ayaz S/o Abdur Rasheed	Peshawar	6-Aug-1978	Matric	30-Sep-1997	12-Jan-2017	Not cleared	Not Undergone	
41.	Bakht Ali S/o Babuzai	Dir Lower	3-Feb-1979	FA	30-Sep-1997	27-Dec-2016	Not cleared	Not Undergone	
42.	Zainullah S/o Said Mula Khan	Mardan	10-Mar-1973	Matric	1-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
43.	Said Akbar S/o Abdul Akbar	Swat	15-Mar-1973	FA	1-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
44.	Younas	Haripur	5-Jun-1973	Matric	1-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
45.	Maroof Shah S/o Muhammad Shah	Peshawar	26-Aug-1977	F.A	1-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
(46.	<u> </u>	Mohmand	6-Dec-1977	F.A	1-Oct-1997	27-Dec-2016-	Not cleared	Not Undergone	
47.	Bakhtiar	Dassu	1-Jan-1978	Middle	1-Oct-1997	12-Jan-2017	Not cleared	Not Undergone	
48.	Muhammad Riaz S/o Atlas Khan	Mohmand	3-Apr-1979	Matric	1-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
49	Qaisar Nawaz S/o Sar Anjam	Lakki Marwat	8-Mar-1973	Matric	2-Oct-1997	28-Feb 2020	Not cleared	Not Undergone	
50		A/ Agency	10-Sep-1977	Matric	3-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
51	Khaliq	Chitral	31-Dec-1975	Matric	4-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
52			3-Jun-1973	Matric	23-Oct-1997	27-Dec-2016	Not cleared	Not Undergone	
5.	3. Inayatuliah S/o Atauliah Kha		6-Sep-1976	Matric	29-Nov-1997	27-Dec-2016	Not cleared	Not Undergone	
5	Muhammad Ali Khattak S/o Sher Jang	Karak	5-Apr-1973	Matric	4-Dec-1997	27-Dec-2016		Not Undergone	
.5	55. Amir Faraz S/o Gul Faraz	Bannu	1-Apr-1974	BA	4-Dec-1997	27-Dec-2016		Not Undergone	
. 5	56. Sabz Ali Khan S/o Arsal Kha		15-Dec-1973	BA	5-Dec-1997	27-Dec-2016	Not cleared	Not Undergone	
\ \[ \sigma_{\text{5}}	57. Arif Khan S/o Yaqoob Khan	Lakki Marwat	8-Oct-1974		• • •	-12-Jan-2017		Not Undergone	
. [	58. Aftab Ali S/o Afsar Ali	Bannu	24-Sep-1976		5-Dec-1997	12-Jan-2017		Not Undergone	
. \	59. Jehangir S/o Talimand	Malakand	1-Apr-1975	Matric	8-Dec-1997	27-Dec-2016	Not cleared	Not Undergone	
	60. Muhammad Dilshad S/o Abdul Ghafoor	Haripur	15-Oct-1975	Matric	8-Dec-1997	27-Dec-2016	Not cleared	Not Undergone	2
	61. Sajid Mehmood S/o Muhammad Sadiq	Mansehra	1-Dec-1973	Matric	10-Dec-1997	17-Oct-2017	Not cleared	Not Undergone	1

]	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
3		Farooq Niaz Khan S/O Falak Naz	Bannu	20/Mar/1980	F.A	5-Oct-2007	05-10-2022	Not cleared	Not Undergone	
3		Abdur Raziq S/O Gul Zarin Shah	Malakand	18/Reb/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 Undergon	9
	397.	Farman S/O Sher Wali Khan	Bannu	12/Jan/198	4 Matric	6-Oct-2007	05-10-2022	Not cleared	Not Undergon	е
	398	Hamid Muhammad S/O Din Muhammad	Bannu	21/May/198	4 M.A	6-Oct-2007	05-10-202	2 Not cleared	Not Undergon	e
	399	Ihsan Ullah Khan S/O Muhammad Tariq Khan	Bannu	2/Jun/198	34 F.A	6-Oct-2007	05-10-202	2 Not cleared	i Not Undergor	ıe
	400	Ibrar Khan `S/O Hayat Ullah Khan	Bannu	9/Apr/198	35 Matric	6-Oct-2007	05-10-202	Not cleared	d Not Undergo	ne
	401	Barkat Ullah khan S/O Nasrullah Khan	Bannu	5/Apr/19	86 Matric	6-Oct-2007	05-10-202	Not cleare	d Not Undergo	ne



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PB	Name with parentage	Domicile	DOB	Qualifi- Cation	DOA		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	ВА	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
403	A -: FAI: Shah E /O Tohir Ali	Bannu	7/Jul/1987	F.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
404	Se 1 Se	Bannu	5/Feb/1989	M.A	6-Oct-2007	05-10-2022	Not cleared	Not Undergone	
405	G-V Sh-h S /O Vorim	Charsadda	7/Jan/1979	M.A	7-Oct-2007	05-10-2022	Not cleared	Not Undergone	
40	Walter and I Walt Shop S/O Amer	Bannu	18/Apr/1984	Matric	7-Oct-2007	05-10-2022	Not cleared	Not Undergone	
40	N. M. L	Charsadda	6/Feb/1985	Matric	7-Oct-2007	05-10-2022	Not cleared	Not Undergone	
40	8. Shakeel Ahmad s-o Yousaf Khan	Nowshera	14-Jul-1979	Matric	6-Apr-2009	10-May-2012	Not cleared		
40	Shakeel Khan S-O Madad Khan	Peshawar	8-Dec-1985	Matric	6-Apr-2009	10-May-2012	Not cleared	Not Undergon	8

	retirent,			 •	HEADQUARTERS PRISON PESHAWAR
			dated :		
No	<del></del>			٠.	
		•	•		

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

Page **20** of **20** 

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

#### NOTIFICATION

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

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

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

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

The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Peshawar.

The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.

The Secretary to Government of Khyber Pakhtunkhwa, Law & Parliamentary Affairs Department Peshawar.

The Secretary to Government of Khyber Pakhtunkhwa, Health Department, Peshawar.

The Secretary to Government of Khyber Pakhtunkhwa, P & D Department Peshawar.

The Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar.

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.

PS. to Home Secretary Khyber Pakhtunkhwa.

DEPUTY SECRÉTÀRY (P&R)

Freputy Secretary (Piscas & Regulation) Govt: of Klipber Paketanklena Home & Trival Affairs Department

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#### APPENDIX.

•	•		UPPER I	EXECUTIVE STAF	<u>F</u>	
		-/	3	4 ,	- 5 <u>- l</u>	METHOD OF RECRUITMENT
1 1	SERIAL NO	NOMENCLATURE OF POST	MINIMUM QUALIFICATION FOR APPOINTMENT BY INITIAL RECRUITMENT OR BY TRANSFER	MINIMUMQUA LIFICĂTION PRESCRIBED FOR PROMOTION	AGE LIMIT	
	1.	Inspector General Prisons (BPS-20)				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
					1949	Management Course:  Provided that if no suitable officer is available for promotion then by transfer from PAS / PMS Officers.  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.
	2.	Deputy Inspector General Prisons/ Commandant/ Superintendent Central Prisons (BPS-19)				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:
			bre		y	promotion then by transfer from amongst PAS / PMS Officers.  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.

De GHOURI SHARED SERVICE RULES unless Revised Approprial Service Rules in the light of SSRC Meeting daied 3:508-30.1 for weilinguides

#FOREST & TELLIS A SERVICE RULES unless Revised Approprial Service Rules in the light of SSRC Meeting daied 3:508-30.1 for weilinguides

• •	• •		6
			3 By promotion, on the basis of seniority-cum-fitness,
	1		from amongst the holders of the posts of Deputy
	3.	Assistant Inspector	from amongst the holders of the Semior
-7	1	General Prisons / Deputy	from amongst the holders of the serior Superintendents Jail, PSO to Commandant and Senior
		Commandant/	/ /D_aana Managementi Willi at Dasc Div
	1	Superintendent District	
•	1 1	Jail (BPS-18)	years service as such, and who qualified departmental examination prescribed for
	1 1	Jan (Dro-10)	Superintendent Jail Class-II.
			Note: For the purpose of promotion to the post of
			Note: For the purpose of prisons/Denuty
			Assistant inspector distinguished and an inspector
	i i		Commandant/ Superintendent District Jail, a
			1 I am of Denity Superintendents
7. 21			The commandant and Semior
			Jail/PSO to Committee
		<del></del>	THIS Hadden
			maintained.
			21 To 30 (a) Seventy percent by promotion, on the basis of seniority-
	` <del>  </del>	Deputy Superintendent	(a) At least Second Class   least fittless from amongst the notices and
	4.	Deputy Superintendent	
,		Jails/PSO to	Bachelor's Degree of its  Assistant Superintendents equivalent qualification Superintendent Jail (Female), with at least five years service
	1	Commandant/ Senior	
1.1	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Instructor (Prison	The state of the s
A		Management) (BPS-17)	University; and  (i) successful completion of promotion course
Kar y			
Vr."			
			Gir alcompage of mandatory departmental examination
چا <sup>ر در ا</sup> اور ز			(i) height 5 feet and 7 prescribed for Deputy Superintendent Jail;
" A Nove			1 inches:
			(b) ten percent by initial recruitment through Public Service
. "%	*	, T.	
	·   .	\	service Assistant Superintendents under Sand Sand Sand Superintendents of three years service and possess minimum qualification or three years service and possess minimum qualification or
			expansion. three years service and possess minimum quantum entry expansion.
			expansion. eligibility criteria prescribed for initial recruiument as
			specified in column No.3; and
	` \ \\ \		
			without glasses; (c) Twenty percent by initial recruitment.
			(iv) free from any kind of Note: For the purpose of promotion to the posts of Deputy
	1		Instructor (Prison Management), a joint democrat
•	. 1		
			Assistant Superintendents Superintendent Jail (Female) shall be maintained.
· _\ _	<b>\</b>		
	<u> </u>		

			· - ' · ' · '		-	
	and the second second					(a) Thirty percent by promotion, on the basis of seniority-
			·	4	5	by promotion, on the basis of services
	1	<del></del>			21 To 30	(a) Thirty percent by propert the holders of the posts of
		7.	Second Class	- \		cum-fitness, from amongs, and secondary School
	1 1 .	ll	1 At least Second	1	Years	Chief Head Warders, having Secondary  Certificate or its equivalent qualification from a  Certificate or its equivalent five years service as
		Assistant Superintendent	There of Its	1	·	Chief its equivalent qualification from a
	5.	Jail (BPS-16)	Bachelor's Degree or its equivalent qualification from a		1	Certificate or its equivalent quantication  Certificate or its equivalent quantication  recognized Board with at least five years service as  recognized Board with at least five years service as
<i>+1</i>		Jan (pro-ro)	and an all street and the street and			recognized Board with at least live years Head Warder and Chief Head Warder, subject to-
•	1		equivalent Timinersity: and		i	The state and Chief Head Warder, subject to
			recognized University; and	1		Head Warder and Office
			• • • • • • • • • • • • • • • • • • • •			s
	i	1 :-	(b) Physical standard:			completion of promotion
			(b) Physical stan-			(i) succession for Assistant Superintendent Jail; and
\	1.		1 71			(i) successful completion of promotion prescribed for Assistant Superintendent Jail; and prescribed for Assistant Superintendent Jail; and clearance of mandatory departmental examination
	•	. " .	(i) height 5 feet and 7		1	
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	1		inches;			[11] Clear Superintendent Jail;
	<del>-</del>		inches,		1	(ii) clearance of manuality dependent Jail; prescribed for Assistant Superintendent Jail; prescribed for Assistant on the basis of seniority-cum-
	· 1				1	prescribed for Assistant Superintendent Jan, prescribed for Assistant Superintendent Jan, (b) ten percent by promotion, on the basis of seniority-cum- fitness, from amongst the holders of the posts in service fitness, from amongst the possess minimum qualification or
			(ii) chest 33x34 inches	en e	1	(b) ten personner the holders of the posts in service
			(ii) chest 33x34 filesto		1	fitness, from amongst areas minimum qualification or
			without expansion and			fitness, from amongst the holders of the posts in fitness, from amongst the holders of the posts in fitness, who possess minimum qualification or Senior Clerks, who possess minimum qualification or senior clerks.
	l l		33x341/2 with			Series prescribed for initial recruitment,
			33%341/2		1	Senior Clerks, who possess minimum quantities with at eligibility criteria prescribed for initial recruitment; with at least five years service as Junior Clerk and Senior Clerk,
			expansion;			least five years service as our
					· 1	1000
~ _	· · · · · ·		wision of eyes 6/6	<del></del>		subject to— (i) successful completion of promotion course prescribed for— (ii) successful completion of promotion course prescribed for— (iii) successful completion of promotion course prescribed for— (iiii) successful completion of promotion course prescribed for prescri
1					1	(i) successful completion of pro-
		2.5	without glasses;			(i) successful completed  Assistant Superintendent Jail; and  (ii) clearance of mandatory departmental examination  (iii) clearance of mandatory departmental examination
1			WIGHTOUT B	1 .		Assistant of mandatory departmental examination
	· 1			1 .	· 1	(ii) clearance of maintendent Jail; and
		• 1	(iv) free from any kind of			(iii) clearance of mandatory department.
1			(iv) free from any disability.	1 .	· \	prescribed for Assistant Superintent. (c) sixty percent by initial recruitment.
1	1		disability.		1	(c) sixty percent by promotion, on the basis of
. 1	1				-1	(a) Twenty live percent by Produce of the posts
	1		· \		21 To 30	seniority-cum-fitness, from amongst the holders of the seniority of Chief Head Warders (Female), with Secondary School of Chief Head Warders qualification from recognized
1			(a) At least Second class	3	Years	senionty-cum Wanders (Female), with Secondary School
. 1	· ·		(a) At least become	2	1 cars	of Chief Head Walders I describe from recognized
	· 1 6.	Assistant	Bachelor's Degree or its	<b>"</b>	- I	Configurate or its equivalent quantication
	.	Superintendent Jail	Daction from	a	1.50	Certificate of locat five years service as Head Warder
4		Superante 16)	equivalent qualification from	1	1	Certificate or its equivalent qualification from residual Certificate or its equivalent qualification from Parallel and Warder Board, and at least five years service as Head Warder (Female), subject to (Female) and Chief Head warder (Female), subject to (Female) and Chief Head warder (Female), subject to
. I .		(Female)(BPS-16)	recognized University; and	1	· •	(Female) and Chief Head warder (Female), prescribed for
1	`}`		Tecoginized	- 1· ·		
1				1	1	(Female) and Chief Head warder (Female), subject to (Female) and Chief Head warder (Female), subject to (Female) and Chief Head warder (Female), subject to (Female) and (Fema
i	1		(b) Physical standard:		V	Assistant Superintendent Jail; and (ii) clearance of mandatory departmental examination (iii) clearance of mandatory departmental examination
1	1	1	(i) height 5 feet & 01 inch;	1		departmental departmental
				- 1	1	(ii) Clearance Superintendent Jail; and
			(ii) Vision of eyes 6/6 witho	ut		(ii) clearance of mandatory department.  prescribed for Assistant Superintendent Jail; and prescribed for Assistant Superintendent Jail; and (b) seventy-five percent by initial recruitment;
. 1			(ii) Vision of cycle			the payenty-five percent by initial recruitments
	)					(b) severing and p
			glasses; and (iii) Free from any kind	01		
	·		(111) FIEC 220-22	1 11 1		
	, 1		disability.	1 1 1	.0	
· 1	· • •				<u> </u>	<del>Till</del> en en ekkele k <u>an</u> er en ekkele kan kan bereke en er ekkele en en en en ekkele en ekkele en ekkele en ekkele e
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2.7		· · · · · · · · · · · · · · · · · · ·		WATCH	AND WARD STAFF	1	
i		/in		1.	4	5	" 6
	7.	Chief Head Warder (BPS-11)	3		Middle passed for those officials who were appointed prior		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-
(3)	The season of the season of				to 04.11.2002; and Secondary School		(a) successful completion of promotion course prescribed for Chief Head Warder;
					Certificate or its equivalent qualification from a		Examination prescribed in their own cadre; and (c) Possess minimum qualification as specified in column No.4.
	•				recognized Board for those officials who were appointed on or after 04.11.2002		Note: Head Warders, who possess Middle pass qualification, are exempted from condition of clause (b) above.
	8.	Chief Head Warder (Female)(BPS-11)	<del></del>	(a)	Middle passed for those officials who were appointed prior to 04.11.2002; and		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)	Secondary School Certificate or its equivalent		(b) clearance of departmental professional examination prescribed in their own cadre;
					qualification from a recognized Board for those officials who		(c) Possess minimum qualification as specified in column No.4.  Note: Head Warders (Female), who possess Middle
					were appointed on or after 04.11.2002		pass qualification, are exempted from condition of clause(h) above;
				1-11-			

Deputy Secretary The Completes Gave of h ATTESTE

:	•					5	<del>`</del> <del>`</del>
•	· 	<del></del>	2	3	4	30 to 45	By initial recruitment.
	. <u>1.</u>	9.	Gate Keeper (BPS-11).	(i) Secondary School Certificate in Second		Years	
4.74 - 14 - 17 - 17 - 17 - 17 - 17 - 17 -	~ •	,		Division from a recognized Board; and	*		
				(ii) Ex-Junior Commissioned	-y: 		
(2)	2 No.	-	3.	Officer from Armed /Paramilitary forces.		•	By promotion, on the basis of seniority-cum-fitness,
U	)	10.	Head Warder (BPS-09).		(a) Middle passed for those officials who	)   .	from amongst the holders of the posts of the
	-	,	1		were appointed	1	(a) successful completion of promotion course
.					prior 04.11.2002; and	3	prescribed for Head Warder.  (b) Clearance of Departmental Professional  The profession prescribed in their own cadre, and
					(b) Secondary School Certificate or it	ol es	(c) Possess minimum qualification as specified in column No.4.
-					equivalent qualification from	m	Note: Warders appointed prior to 04-11-2002, are exempted from condition of clause(b) above;
					a recognized Boar for those officia	ds	
					who we appointed on	or .	
	·-			1	after 04.11.2002		

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	1	2	3	4	5	6
-/	11.	Head Warder (Female) (BPS-09)		(a) Middle passed for those officials who		By promotion, on the basis of seniority-cum- fitness, from amongst the holders of the posts of
	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			were appointed prior to 04.11:2002; and		Female Warders, with at least five years service as such, subject to-
31	· · · · · · · · · · · · · · · · · · ·			(b) Secondary School		(a) successful completion of promotion course prescribed for Head Warder Female; (b) clearance of Departmental Professional
				Certificate or its equivalent		Examination prescribed in their own cadre; and
				qualification from a recognized Board		(c) possess minimum qualification as specified in column No.4.  Note: Female Warders, appointed prior to 04-
			St.	for those officials who were appointed on or after 04.11.2002		Note: Female Warders, appointed prior to 04-, 11-2002 are exempted from condition of clause (b), above.

Deputy Secretary Grant Court of Livings in Home & Tribel Allo

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	ai S	Γ	1	2	; ;	3	4		5	6
	· .	<u> </u>	12.	Warder (BPS-07)	i	For fresh candidates.	_	•	(a) For fresh	By initial recruitment:
	٠.	- 1			1	(a) At least Secondary			candidates	Provided that preference shall be given to
1		_			'	School / Certificate, in			18 to 30	Ex-Uniform Personnel of Pakistan Armed
;		i	•		ļ.	Second Division or its			years and-	Forces i.e Army, Navy, Air Force, Marines
	-	1				equivalent qualification			(b) For Ex-	(Combat Arms Services) and Ex-Para-
. !		1			1	from a recognized Board;			Uniform	military Forces i.e Defence Services
1	• -				1	(b) for fresh candidates,		-	personnel of	Guards, Pakistan National Guards
			,		1 -	with minimum physical				(Mujahid Force), Frontier Constabulary,
4		. 1			1	standard-		•	Pakistan	
7					1	ry historia e elle illa er			Armed	Rangers, Frontier Corps, Gilgit Baltistan
					1	(i) height: 5 feet and 7	1	100	Forces/Para	Scouts, Coast Guards, Baluchistan
						inches, and			-Military	Scouts, Millitia (Combat Arms Services)
. 1					1	(ii) chest: 33x34 inches without expansion and		·	Forces upto	and Ex-Police personnel, retired from
	. <del></del>	<del></del> -				without expansion and 33x341/2 inches with	1		maximum	service within the last five years and not
1					ļ	expansion.		:	40 years	dismissed or retired from service on
		٠.			1	For Ex-Uniform Personnel				medical board grounds, having atleast
						of Pakistan Armed		*		five years service at credit with discharge
			·.	- Land		Forces/Para-military				certificate, graded as "Satisfactory /
			,		1	forces.				Good / Exemplary.
		•			- {	(a) at least Secondary School	1			
					1:	Certificate. or its				
			1		1	equivalent qualification	1			
	1.				- 1	from recognized Board;				
	1.	•			- [	(b) minimum physica	1			
	1		.[		- !	standard-				
٠.,	1				. {	(i) height: 5 feet and (	5		4	
	1				-{	inches; and				
	1		1		-	(ii) Chest: 32x33 inche	s			
	İ					without expansion				
	1					and 32x331/2 inche	s	· · · · ·		
						with expansion.	Λ .			
	1					Note: All Candidates shall be-	1 11			
		-	.			(i) Free from any kind o	of	•		
	1	~	1.			disability		٠.		
					٠.	(ii) with vision of eyes 6/	6	₹ .		
	1		ta li jame ta ja ti			without glasses.	·  -  -			
							X-1		· · · · · · · · · · · · · · · · · · ·	
		· .					<u>.                                    </u>		_	

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·	13.	Warder (Female)	(a) At least Secondary	<b>-</b> ,	18 to 30	By initial recruitment.
.		(BPS-07)	School certificate in		years	
1			Second division or its			
1	·		equivalent	₩.	*.	
1	•		qualification from			
1			recognized Board;			
			and.			
.			(b) Physical Standard:	A STATE OF THE STA		\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-
			(i) height 5 feet & 1 Inch;	. *		
			(ii) vision of eyes 6/6			
			without glasses; and			
-			(iii) Free from any kind of			
			disability			
		11.07			TOTAL CONTRE	
• • •	·  ·		MED:	ICAL & PARAM	EDICAL STAFF	
•	<u></u>			<del></del> -		By transfer from Health Department.
1	14.	Principal Medical Officer	'	: <del></del>	-	By transfer from health Department.
	<u> </u>	(BPS-19)		· · · · · · · · · · · · · · · · · · ·	1_	By transfer from Health Department.
	15	Senior Medical Officer		'	·-	By transfer from freath Department.
		(BPS-18)				By transfer from Health Department.
	16	Surgical Specialist	-		-	By transfer from fleatur beparament.
		(BPS-18)	1 M			By transfer from Health Department.
	17	Cardiologist Specialist				by transier from freadin beparament.
	<u> </u>	(BPS-18)		<u> </u>		By transfer from Health Department.
	18	. Physiotherapist (BPS-18)				by transfer from fronting populations.
	<u> </u>			<del></del>		By transfer from Health Department.
	19	Psychiatrist (BPS-18)			· -	By transfer from fleaten beparameter.
				<del> </del>	21 to 35	By Initial recruitment.
	20	Psychologist (BPS-17)	At least Second class		Years	By initial recommend
		<b>+</b>	Master's Degree in		rears	
			Psychology or its equivalent			
	[		qualification from a			
			recognized University.		<del></del>	By transfer from Health Department.
	21	Medical Officer (BPS-17)	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		<b>=</b> /	by transfer from freathr population
				1 1	· · · · · · · · · · · · · · · · · · ·	By transfer from Health Department.
	€ 22		\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	-		by transier from freathr beparameter.
	/	(BPS-17)	/	<del>      .                               </del>		By transfer from Health Department.
ï	23	Dental Surgeon (BPS-17)		1 the		by transfer from treatm peparameter.
. •	- 1		`	1 1 1 1 1		

D. GHOURI SHARED SERVICE RULES rules Revised Approved Service Rules in the light of SSRC Meeting dated 12-08-2021 for veiling, doc They trey Section 12-08-2021

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1	2	3	4	5 !	6
24	Technologist (BPS-17)	At least Second Class Bachelor's			(a) Sixty percent by promotion, on the basis of seniority-
27	recimologist (Bro-17)	Degree in the relevant	,	Years	cum-fitness, from amongst the holders of the posts of
	V	Technology(Pharmacy/Pathology/			Chief Technicians, with atleast three years' service as
i "		Dental/Surgical etc) from a			such; and
		recognized University/ Institution			(b) forty per cent by initial recruitment.
i "		1			
25 -	Chief Technician	<u> </u>	<del></del>	_	By promotion, on the basis of seniority-cum-fitness,
25 -	(BPS-16)				from amongst the holders of the posts of Senior
1	(B16-16)				
					Technicians with at least two years service as such.
26	Senior Technician		• • •		By promotion, on the basis of seniority-cum-fitness,
	(BPS-16)		· .		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)		<del> </del>	-	By promotion, on the basis of seniority-cum-fitness,
	reclimetan (B1 B-14)				from amongst the holders of the posts of Junior
.					1
1					Technicians, with at least three years service as
<u> </u>			<u> </u>		such."
30	Junior Technician	(a) At least Secondary School	-	18 to 30	By initial recruitment.
	(BPS-12)	Certificate with Science in Second division or its		Years	
		equivalent qualification from			
		recognized Board; and			
		(b) A diploma from a recognized			
		Institution in the relevant			
		field duly enrolled with			
1		Khyber Pakhtunkhwa	:   \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		
<u> </u>		Medical Faculty.			
31	Lady Health Visitor	<del></del>	-	IN N	By transfer from Health Department.
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Could Calendary of the Court of Home of Triangles, and all her tasks.

, Î						MINI	STERIAL ST	AFF	
					<u> </u>	./:	•	5	6
		<u> </u>	1	2	3		4	<del>                                     </del>	By promotion on the basis of seniority-cum-fitness, from
tr		- 3	32.	Deputy Director (BPS-18)	<del></del>			I	emongst the holders of the posts of Assistant Directors, with
8	<b>∹</b> `				ره در		•		at least five years service in BPS-17:  Provided that if no suitable officer is available for
	<i>~</i> 11					1			promotion then by transfer.
							1. 1	1	
1		1			<u> </u>		<del></del>		By promotion, on the basis of seniority-cum-fitness, from
	• '		33.	Assistant Director (BPS-17)					amongst the holders of the posts of Superintendents and Budget and Accounts Officers, with at least three years service
					i				
_	<del></del> -				ì				water the number of promotion to the post of
			•						Assistant Director, a joint senionty list of [
					-		,		Superintendents and Budget and Accounts Officers shall be maintained.
	A Comment	· .					•	`	Officers shan be manifemed.
_	1 10								By promotion, on the basis of seniority-cum-fitness, from
		. —	34.	Superintendent/			<b>.</b>	_	amongst the holders of the posts of Assistants and
, £		. \		Budget and Accounts		\			Accountants, with at least 5 years service as such.
الم العالم	<b>'</b>			Officer (BPS-17)			÷ .		Cuperintendent/Budget and Accounts Officer, a
-			**			• }	1		ioint seniority of Assistant and Accountants and
•	. \						÷		Accountants shall be maintained.
		<u> </u>			At least Second Class B	achelor's		20 to 32	(a) Seventy-five percent by promotion, on the basis of seniority- cum fitness, from amongst the holders of the posts of
		<u>-</u>	35.	Assistant/ Accountant (BPS-16)	Degree or its e	quivalent		Years	Coming Clorks and Assistant Accountants, with at least live
٠.				(BF3-10)	qualification from a re	cognized			years service as Junior Clerk and Semor Clerk of
					University.		•	-	Assistant Accountant.
		5 1						. 1	Note: For the purpose of promotion to the post of Assistant/Accountant, a joint seniority of Senior Clerk and
٠.									Assistant Accountant shall be maintained; and
		. }			<b>引 [4]</b> (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)		\ \		
	_ \ '			ì		-,	- `		(b) Twenty- five percent by initial recruitment":
	· \		·- ·					-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the posts of Junior Clerks, with at
		[	36.	Senior Clerk/ Assistant Accountant (BPS-14)					least two years service as such.
	: \ \	1		Accountant (BFS-1-1)	• /				least two years service as service
•	.	- \						WHP (	
	\	. 1			, A.			<b>1</b> 27 \	
. '	-	ļ	<u></u>				<del></del>	1 1	
-		•		•				<i>III</i> ,	

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			. 1	·						<u></u> -	<u> </u>	<u> </u>	4	į	5	6
17			37.	, Tar	mior Clerk	(BPS-11)	(a)	F	A/F.Sc		with	i N	/latriculati	OTL	18 to 30	(a) Twenty five percent by promotion, on the basis of
. [			• • •	ال	elitor Olcin	. (210 22)	1 1				sion or	- 10	r its	ì	Years	seniority-cum-fitness, from amongst the holders of the posts
				ļ ·.					ts		uivalent		quivalent			of Restorers, Naib Qasids, Bahishtis/Water Carriers,
1	٠,		•	ł							from a		ualificatio		• • • • • • •	Photostate Machine Operators, Tubewell Operators,
				: 1	, ia .	e i	1				Board:		rom a	i i	•	Plumbers, Malis, Engine Men, Dhobis, Chowkidars, Pipe
. [		. :		·			i		ecogni	zeu	Doaru,	, , -	recognized	- 1		Fitters, Sweepers, including holders of other equivalent
			*						and							posts in the Department, with two years service as such,
		- 1					(b)				hirty (3	' 1	Board.	-		having qualification as specified in column No.3:
	<i>!  </i>	1		· 1							ninute		•			Provided that if no suitable official is available for
17.	1.1	:			7.7		1	t	yping	in E	nglish	on 📑				promotion then by initial recruitment;
\ (	2	ļ			el tratalis				omput	ter.		- 1				(b) twenty-five percent by initial recruitment from
			,	- 1			ļ'									amongst Warders, who have at least five years service and
•		· ' \		1.			·				٠ ١.	- 1	:			possess minimum qualification prescribed for initial
	1			ľ			. ]					- 1	-			recruitment:
		i													·	Provided that:-
	<u> </u>		ــــــــــــــــــــــــــــــــــــــ	[_	· ·					· • •	·	<del></del> -	·		· · · · · · · · · · · · · · · · · · ·	(i) if two or more officials have acquired the FA/FSc
		S. The	į	.					•							qualification in the same session, the inter-se-seniority in
•	1 > 4	1. "		· 1		1. 51	.				,	1		-		the lower post shall be maintained for the purpose of
	A STATE OF THE PARTY OF THE PAR											{			V	determining seniority in the higher post; and
	£		<b>}</b>		•							. [		•		(ii) where a senior official does not possess the requisite
				1								- 1				qualification at the time of filling up a vacancy, the
ś			1.	1	÷	1.00	1				•					official, next junior to him possessing the requisite
1,	. [*	-	1		•					Sec. 1	A 100 C		: .			qualification, shall be promoted in preference to the senior
<del>4-3</del> 5				· \								. 1				official or officials:
1					•		.   '			•				,		Provided further that the condition F.A/F.Sc or its
			1			· .								•	1.	equivalent qualification from a recognized Board, as laid
			1	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \											1 :	down at clause (a), shall not apply till the expiration of a
								.: 1								period as specified in the second proviso in column No.5,
:	1 .	100		· 1	. :				•				1			against Serial No.4 of the Establishment Department's
	-		1	ļ	·		. [			-	. `		1		1	Amending Notification No. SO(E&D)/1-35/2014, dated 18-
	· [ ,	٠	1	1		· <u>:</u> .	-		• •			•	1			07-2019, to the existing matriculate incumbents of the posts
•	- 1 .	: .		Ì			·  .				.•			•		of Restorer, Naib Qasid, Bahishti / Water Carrier, Photostate
•	. 1			ŀ	·	• •	· .		× 1		٠,					Machine Operator, Tubewell Operator, Plumber, Mali,
	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \					:	. 1	•	•				\ ·			Engine Men, Dhobi, Chowkidar, Pipe Fitter, Sweeper,
								•								including holders of other equivalent posts, for promotion to
	.					1.5	1				•	,				the post of Junior Clerk.
	. 1							•			·, .					Note: For the purpose of promotion, there shall be
	1 .	- 1			1	<u> </u>	: : 1			1						maintained a joint seniority list of Restorer, Naib Qasid,
					1	\ · · ·			- ,,-							Bahishti/Water Carrier, Photosfate Machine Operator,
•	ļ		' '	. :			1			٠, .	•		Λ .		1.00	Tubewell Operator, Plumber, Mali, Engine Men, Dhobi,
	T.		.			•		-		· ·			-1 11			Chowkidar, Pipe Fitter, Sweeper etc; with reference to the
	·	.7.4			1		~ \ <u>\</u> /\						1 1	,		dates of their acquiring the F.A VF.Sc or its equivalent
	· .			٠,,			_ /		·			٠.,	-{	. 0		qualification from a recognized Board; and
	, 1	1 .	-   '-							'			<del>_</del>	<u>51</u>		(c) Fifty percent by initial recruitment:
	<i>)</i>	,	L											$\Delta I$		

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- 1	2 /	3	4	5	6
85	Bahishti/Water Carrier	Primary Pass		18 to 40	By initial recruitment
85		Timiday Tabe		Years	
-	(BPS-03)		, <u> </u>		
96	Naib Qasid (BPS-03)	Primary Pass	-	18 to 40	By initial recruitment
86	Naib Qasid (Br3-03)			Years	
	1 O11-1 (BBS 03)	1		18 to40	By initial recruitment
87	Chowkidar (BPS-03)			Years	
	6 (770, 63)			18 to 40	By initial recruitment
88	Sweeper (BPS-03)			Years	
<u> </u>	1 (777)	Preferably Literate		18 to 40	By initial recruitment from the respective Districts.
89	Plumber (BPS-03)	Preferably biterate	<del></del>	years	
<u> </u>		Preferably Literate and skilled		18 to 40	By initial recruitment from the respective Districts.
. 90	Barber (BPS-03)	Preferably Literate and samed		vears	
		in the relevant trade	<u> </u>	18 to 40	By initial recruitment from the respective Districts.
91	Baker (BPS-03)	Preferably Literate and skilled		vears	
		in the relevant trade	<del>                                     </del>	18 to 40	By initial recruitment from the respective Districts.
92	Dhobi (BPS-03)	Preferably Literate and skilled		vears	
		in the relevant trade	<del> </del>	18 to 40	By initial recruitment from the respective Districts.
93	Attendant (BPS-03)	Preferably Literate		vears	by middle root articles and the resident
					By initial recruitment from the respective Districts.
94	Female Attendant	Preferably Literate	-	18 to 40	by minar recruitment from 210 1-1-1-1
	(BPS-03)		<u> </u>	years	By initial recruitment from the respective Districts.
95	Executioner (BPS-03)	Young energetic literate	-	18 to 40	By midal reciditment from the responsive pro-
		persons.		years	
96	Piper (BPS-03)	Having practical skill in the	•	18 to 40	By initial recruitment.
	, -p,	relevant field.		years	
97	Drummer (BPS-03)	Having practical skill in the		18 to 40	By initial recruitment.
	Diaminer (Di O 00)	relevant filed.		years	
98	Pipe Fitter (BPS-03)	Qualified in pipe fitting	911	18 to 40	By initial recruitment, after practical test.
90	Libe Litter (pro-02)	Zammion F-F		vears	

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No. 8/17 Dated AF / 10 /2002

The Inspector General of Prisons. Klivker Pakhtunkhwa Peshawar.

Subject:

ARRANGEMENT OF MANDATORY PROMOTION COURSE FOR AS

R-Sig

Please refer your letter No. 34471 dated 10,10,2022 and tetter Endst No.

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 where Superintendent Central Prison Haripur where Superintendent Central Prison Haripur before the FC Platoon (from the old place/harmeks) from Prisons Staff Training Academy Haripur before 31 10 2022 13,10,2022.

It is pertinent to mentioned here that the current basic course for newly walders will be Therefore, the following schedule is arranged for promotional/Busic training co-rese 31.10.2022.

It is pertinent to members	elindule is arrai	uned the literary	Prom	10
anded on 31,10,2022. Therefore, the following so	I The continue	No of	J. Letter	
ended on 51.16	Dillation	Trainces		
Sa Mame in Comme		1 ranco	NT 11 2002	(69.01 2-52)
	02 Months	30	]	
				. [
Prominger Aggictant	ļ .		<b>!</b>	ii
Warder/Senior Close	_		07.11.2022	00.01.2023
Superintendent Jail   Superintendent Jail   Basic Training Course (Batch-II) for newly   Basic Training Course (Male) (Same Batch not	02 Months	70	107.11.40-0	ļ. · · · · · · · · · · · · · · · · · · ·
Superince (Dately-II) for newly	WZ-Institution.		]	h :
2   Basic Training Course (Batch and recruited Warders (Male) (Same Batch not		[· · · · ]	•	اـــــــ ـــــــــــــــــــــــــــــ
" William Warders (Mille) Comme		<u> </u>	Unarie train	ing contre to .
recruited Warders (Male) (Same Batch not to include Ex-Man)	aleated trains	ees for promotion	Elly Dyrole alam	
to include the state of the street line no	Millitaire areas	• •	1	

It is further added to direct the nominated trainees for promotion

bring the below noted kits with them, Name of item/artic Name of item/article (كالأساده) بيلست (سليد) 6 <u>ديئ بيج</u> سيلل ك زيالا شلار) X خاکم+ ۱۱) جیبور، وال براث(کالا) 10 12

Moreover, Trainers are of ulmost importance for impuring of any type of training of workshop etc. The neaderny did not have its own trainers for delivering leadure and presentations it is therefore requested that Superintendent Central Prison Haripur or other Jall's Superintendent may be directed to depute the trainers/instructors for the following subject/classes for the above memored promotional/busic courses or any other suitable arrangement of Trainers accompanyly, please;

promotional/busile con-	en PPC, related to 4 Prison	er Pakhtunkhwa Prisons Rules
1. Law Officer (To teach the	5 Psych	ologist
court maters	Aid hyplenie etc)	
2 lestructors (Diagrams relations) 3 Doctor (For awareness relations)	urou ,	COMMANDANT
	PRISON	COMMANDANI IS STAFF TRAINING ACADE PSTA ILLRIPUR PSTA ILLRIPUR



The Commandant

Prison Staff Training Academy Haripur MANDATORY PROMOTION COURSE FOR CLERKS TO THE POST ASSISTANT SUPERINTENDENT Subject:

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

that the following Senior Clerks (5.					
lliër i	ubiec	-ited course please:	Place of	Posting	
ine s		Will Darontage of Design	Inspecto	rate of Prisons	
•	S#	The shareman lanial, (Sellio) die	Sub Jail	Jamruo	
	1.	Para (Senior Clerk)	District .	ail Kohat	
	2.	Abdul Haseeb, (Senior Clerk)	Central	Prison Mardan	
	3:		District .	ail Swat	
	4.	Hairley (Sellio) Olony	Control	rison Margan	
;	5.	Mr. Naveed Hadden  Muhammad Ali, (Senior Clerk)	Cub lail	Dassu Konistan	
	6.		Central	rison Peshawar	
	7.	Mr. Hayat Ur Kellitan (CHW)  Mr. Hamesh Gul S/o Lehaz Gul, (CHW)	mictricl'.	all Chitrail	
	8.	4	Central R	Prison Peshawar 🗸	
	9.	the American Islands Sto January (V	Contral	rison Haripur	
•'	10.		Control F	rison Peshawar	
	11.	Amin S/O IKram Nibra (5.1. /	Dietrict	ail Buner at Dagger	
	12.	B -: Mali S/o Masoom Silan Vol.	Control	rison Mardan	
•	13.	7-1:: Illah S/o ibad Ullah, (Otto)	Control	rison Hampur	
-	14.	A A A A A S A A A A A A A A A A A A A A	Central	nt Centre Ghallanai	
	15.		Internite	ail Timergara	
	16.	Ada Albar Khan S/o Faneem Jan, (Orty)	District	ail Buner at Dagger	
	17.		District	Disea Harour	
	18.	Descen Ahmad S/O Silditada Mining	Central	Prison Haripur	
·	19.		Central	Prison Peshawar	
į	20.	Mr. Qazi Hasbun Ullah S/o Qazi Rafi Ullah, (CHW)	Sub Jail	Charsadda (for duty)	
	21.	Mr. Plussan Karim S/o Karim Dad, (CHW)	District .	Jail Abbottabad	
.	22.	Mr. Hussan Karim 5/0 Karim busy	Sub Jail	Charsadda (for duty)	
	23_	Mr. Flussan Kallin Go Telesakhi Shah, (CHW)  Mr. Sajawal Khan S/o Pir Sakhi Shah, (CHW)	Central	Prison Peshawar	
. 1	24.	Mr. Zahoor Ullah S/o Faqir Jan, (CHW)	Central	Prison Peshawar	
}	25.	Mr. Ali Sher S/o Ghulam Hussain, (CHW)	Central	Prison Peshawar	
Ì	76	Me Caulat Khan S/o Munammad Zaman, (31117)	Contral	Prison Peshawar	
ŀ		The Alamach Sin Fazal Khalig, (CHVV)	Central	Prison Mardan	
$\prec$	<del></del> f	Abelus Dohman S/n Gul Rehman, (UNVV)	Central	Jail Abbottabad	
<b>⋰</b> ∤	-=:	Mar Rachaet Ahmad S/o Mian Muhammao, (Crivy)	i inistrici	Dail Announdad	
	30.	Mr. Rahman Ullah S/o Sher Bahadur, (CHW)	Central	Prison D.I.Khan	
ſ	JU. ]	WII. NATIONAL	劉統。臺		

ATTESTED

DEPUTY DIRECTOR DRATE GENERAL OF PRISONS



INSPECTORATE GENERAL OF PRI KHYBER PAKHTUNKHWA PESHAWAR

201-9210334, 9210406 FEI 031-9213445 https://www.facebook.com/kpkprisons Control prisonsig@gmali.com

2022 10 Dated.\_\_\_\_\_\_

Endst; No.31-801-521-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 dail use for official use of the Academy as described. Letter of Commandant PSTA Haripur referred t

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

Superinténdent Central Prison Peshawar for information. He is directed to relieve Mr. Rashee temporary duty till further orders. Ahmad Senior Clerk (BPS-14) on 01-11-2022 with the direction to report to Superintendent Sub Ja Jamrud for temporary duty till arrival of Mr. Saeed Raza, Senior Clerk from training.

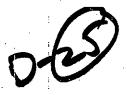
Superintendent Sub jail Battagram for information. He is directed to relieve Muhammad Taimi

Mughal Senior Clerk (BPS-14) on 01-11-2022 with direction to report to Superintendent Sub Ja 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 f

Information.

DEPLY TOIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

1BO/HC



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:

- 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.
- That the Service Rules of the post of Assistant (BPS-16) vide Notification of ii. 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% (Flag-A) while for initial recruitment @ 25%.
- That the Service Rules for Directorate of Reclamation and Probation issued iii. 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)

- 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)
- 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.
- However, the Home & Tribal Affairs Department, Khyber Pakhtunkhwa vide ٧İ. 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.
- 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



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 Superintendant 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 Superintendant 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.

Sincerefy yours,

Shoukat Ali Khan, Head Warder, Central Jail, Peshawar

ATTESTED

#### **VAKALATNAMA**

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

	OF 2022
Shangeat Shi	(APPELLANT) (PLAINTIFF)
	(PETITIONER)
<u>VERS</u>	<u>SUS</u>
Govt: of KP & Others	(RESPONDENT) (DEFENDANT)
I/We Sharkat Sh	
Do hereby appoint and constant Advocate, Peshawar to apprent withdraw or refer to arbitrate Counsel/Advocate in the above liability for his default are engage/appoint any other Advocate in the authorize the said Advocate in the above receive on my/our behalf all seed the said and advocate in the said Advocate in the said Advocate in the said Advocate in the said and seed the said and see	tear, plead, act, compromise, ation for me/us as my/our te noted matter, without any and with the authority to ocate Counsel on my/our cost. The to deposit, withdraw and amounts payable or
Dated//2022	Les -
	CLIENT MACCEPTED
·	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