

28.12.2022

Due to winter vacation, the case is adjourned to 06.04.2023 for the same as before.


Reader

10.01.2023

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Nabi Gul Superintendent for the respondents present.

Learned Member Executive (Miss Fareeha Paul) left the court at 11.00 A.M in order to attend a meeting in the Law Department, Government of Khyber Pakhtunkhwa, therefore, this case is adjourned to 07.04.2023 for arguments before the D.B.


(Rozina Rehman)
Member(J)

SCANNED
FPST
Peshawar

24th May, 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Nabi Gul, Superintendent for the respondents present.

Respondents have furnished reply/comments. Placed on file. To come up for arguments on 08.08.2022 before the D.B. Learned counsel for the appellant may submit rejoinder within a fortnight, if so wishes.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

88-22 Due to the public holiday the case is
adjourned to 30-9-2022



Reader

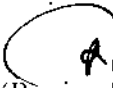
30.09.2022

Appellant present through counsel.

Riaz Khan Paindakhel, learned Assistant Advocate General for respondents present.

File to come up alongwith connected Service Appeal No.4747/2021 titled "Fazal Rabbi Vs. Government of Khyber Pakhtunkhwa" on 15.11.2022 before D.B.


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

15th Nov. 2022

Counsel for the appellant present.

Mr. Nascrud Din Shah, Assistant Advocate General alongwith Nabi Gul, Superintendent for the respondents present.

Former requested for adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 28.12.2022 before the D.B.

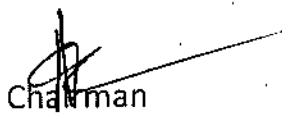

(FAREEHA PAUL)
Member(E)


(ROZINA REHMAN)
Member (J)

SCANNED
KPST
Peshawar

12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.



Chairman

Stipulated period passed reply not submitted.

D
24.01.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Nabi Gul, Superintendent for respondents present.

Reply/comments on behalf of respondents are still awaited. Representative of respondents sought time for submission of reply/comments. Last opportunity is granted to respondent to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 24.05.2022.


(Atiq-Ur-Rehman Wazir)
Member (E)

28.05.2021

Counsel for the appellant present. Preliminary arguments heard.

1471

SCANNED
KPST
Peshawar

Points raised need consideration. The appeal is admitted to regular hearing, subject to all legal objections available to the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/ comments are not submitted within the stipulated time, the office is directed to submit the file with a report of non-compliance. File to come up for arguments on 27.09.2021.

Appellant Deposited
Security & Process Fee



Chairman

27-9-21

DB is on Tour case to come up
For the same on Dated . 24-1-22

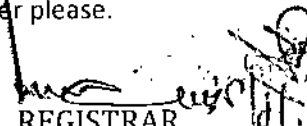
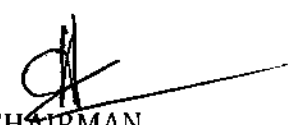
S.
Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 4747 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/04/2021	<p>The appeal of Mr. Fazal Rabbi presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	26/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/05/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 4747 /2021

FAZAL RABBI

VS

GOVT. OF KP & OTHERS

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1 - 3
2.	Appointment order dated 27-07-2005	A	4
3.	Joining Report	B	5
4.	Office Order dated 17-08-2005	C	6
5.	Educational Testimonials	D	7-8
6.	application	E	9
7.	letter dated 23-07-2020	F	10-11
8.	Order Dated 30-07-2020	G	12-14
9.	Departmental Appeal dated 15-12-2020	H	15
10.	Wakalat Nama	-----	16

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE

Khattak Law Associates,
Fate No. 4, 2nd Floor, Juma Khan Plaza,
Warsak Road, Peshawar

0345-9383141

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____/2021

Mr. FAZAL RABBI, Mali (BPS-04),
Govt. Middle School Ganj Mandi, Peshawar.

..... **APPELLANT**

VERSUS

- 1- Government of Khyber Pakhtunkhwa, Secretary, (Social Welfare) Special Education & Woman Empowerment Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Director (Social Welfare), Directorate of Social Welfare, Special Education & Women Empowerment, Jamrud Road, Peshawar.
- 3- The District Officer, (Social Welfare), District Swat.

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE INACTION OF THE RESPONDENTS BY
NOT PROMOTING THE APPELLANT TO THE POST OF
JUNIOR CLERK IN LIGHT OF PROMOTION QUOTA
RESERVED FOR CLASS-IV EMPLOYEES AND AGAINST
NOT TAKING ANY ACTION ON THE DEPARTMENTAL
APPEAL OF THE APPELLANT WITHIN THE STATUTORY
PERIOD OF NINETY (90) DAYS**

PRAYER:

That on acceptance of this appeal the inaction of the respondents by not considering the appellant for promotion to the post of Junior Clerk (BPS-11) in light of the quota reserved for Class-IV employee may very kindly be declared illegal and the respondents may kindly be directed to consider the appellant for promotion to the post of Junior Clerk (BPS-11) with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHWETH:

ON FACTS:

1. That appellant is the employee of the respondent Department and is appointed as Mali (BPS-01) now (BPS-04) vide order dated 27-07-2005 with the terms & condition mentioned therein in the appointment order and since from the date of appointment the appellant the appellant is working quite efficiently, whole heartedly and upto the entire

- satisfaction of his high ups. Copy of appointment order & Joining Report is attached as annexure **A & B.**
2. That the appellant was medically examined and was declared medically fit for government job by the concerned Medical Superintendent, Civil Hospital, Saidu Sharif, Swat and accordingly office order dated 17-08-2005 w.e.f. 01-08-2005 was issued to the appellant. Copy of the Office Order dated 17-08-2005 is attached as annexure **C.**
 3. That appellant along with the performance of his official duties also improved his education qualification by acquiring MA (Pashto) Degree from University of Malakand in the year 2010 as well as PST, CT, B. Ed & M.Ed in Special Education. Copy of Educational Testimonials are attached as annexure **D.**
 4. That the appellant forwarded application for his further promotion which was corresponded among the respondents vide letter dated 23-07-2020. Copy of application & correspondence is attached as annexure **E & F.**
 5. That in the meanwhile respondents issued promotion order dated 30-07-2020 whereby various categories of employees were given promotion to the post of Junior Clerk (BPS-11) by completely ignoring the appellant having sufficient and eligible length of service. Copy of the Order Dated 30-07-2020 is attached as annexure **G.**
 6. That appellant aggrieved from the inaction of the respondents by not promoting the appellant to the post Junior Clerk (BPS-11) filed Departmental Appeal dated 15-12-2020 but till date no response has been received after the lapse of stator period. Copy of the Departmental Appeal is attached as annexure **H.**
 7. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others.

GROUND:

- A- That act of the respondents by not promoting the appellant to the post of Junior Clerk (BPS-11) having all the requisites is against the law, facts and norms of natural justice hence not tenable.
- 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 all the requisites required for promotion to the post of Junior Clerk (BPS-11) is available with the appellant but even then the respondent is not promoting the appellant to the post of Junior Clerk (BPS-11).
- D- That the appellant has a qualification of MA (Pashto) from a reputed and recognized university with 22 years of service experience since from the date of appointment and accordingly to the notification the appellant is fully entitled for promotion to the post of Junior Clerk (BPS-11).
- E- That act of the respondents by not promoting the appellant to the post of Junior Clerk is against the prevailing Law & Rules.
- F- That, the respondent Department acted in arbitrary and malafide manner while not promoting the appellant to the post of Junior Clerk (BPS-11).
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 06-04-2021

APPELLANT

FAZAL RABI

THROUGH:

NOOR MOHAMMAD KHATTAK

&

MUHAMMAD MAAZ MADNI
ADVOCATES

Answer A (4)

No.F.1-6/2004/A-1
GOVERNMENT OF PAKISTAN
MINISTRY OF SOCIAL WELFARE AND SPECIAL EDUCATION
DIRECTORATE GENERAL OF SPECIAL EDUCATION
Hanna Road, Opp: NORI Hospital, G-8/4

Islamabad the 27 July, 2005

MEMORANDUM

SUBJECT:- APPOINTMENT TO THE POST OF MALI (BS-1)

Reference his/her application and having been recommended by the Departmental Selection Committee and approved by the Competent Authority, Mr./Mrs./Miss FAZAL RABI S/O MIAN HAIDER is offered the post of Mali (BS-1) in the Scheme "Upgradation of Special Education Centre for Hearing Impaired Children" Swat under the Directorate General of Special Education, Islamabad on the following terms and conditions:-

- i. He/She will be entitled to a pay in the Basic Pay Scale No. 1 viz Rs.2150-65-4100 plus allowances as may be admissible under the rules.
- ii. The appointment is purely on temporary basis subject to Medical Fitness, Verification of required Educational Documents, Diploma and Experience Certificates etc. at the cost of individual and character & antecedents have been verified.
- iii. He/She will be on probation for a period of one year extendable for another one year by order either before or after its termination. Provided further that in the absence of an order, the period of probation shall on the expiry of the extended period be deemed to have been successfully completed in accordance with the Section 21 of the Civil Servant (Appointment, Promotion and Transfer) Rule 1973 as amended from time to time.
- iv. His/Her services are liable to be terminated at any time without assigning any reasons, by giving a notice for a period not less than 14 days or payment, in lieu of the notice, of a sum equivalent to his/her pay for 14 days or for the period by which the notice falls short of 14 days.
- v. In case he/she wishes to terminate his/her services under Government he/she shall resign in writing and shall therefore continue to serve Government until his/her resignation is accepted. If he/she absents himself/herself he/she shall be liable to disciplinary action which may result in disqualification from any further employment under Government.
- vi. He/She will have no claim or title to permanent retention/confirmation on any post under this Directorate General on the basis of appointment.
- vii. He/She may be posted transferred at any Province/District as per requirement of his/her services at any time.
- viii. No request for change of station of posting will be entertained for which offer is accepted before completion of three years of service.
- ix. He/She is directed to provide two passport size photographs and two copies of computerized National Identity Card.

2. If the offer is acceptable to him/her on the above-mentioned terms and conditions he/she should report for duty latest by 15th August, 2005, and submit his/her acceptance through Officer Incharge, "Upgradation of Special Education Centre for Hearing Impaired Children" Near Secondary Education Board, Saidu Sharif, Swat

(M. MUSTAQUEEM SIDDIQUI)
DEPUTY DIRECTOR(ADMN)

Mr. Fazal Rabi s/o Mian-Haider,
Mohallah Zumarud Khan, Mingora, Distt. Swat
Post Code 19310

Copy to:

- i. Director, (NR), DGSE, Islamabad.
- ii. Officer Incharge, SEC. HIC, Swat

DEPUTY DIRECTOR(ADMN)

AT TESTED

Anexure "B"

5

GOVERNMENT OF PUNJAB
DEPARTMENT OF EDUCATION
OFFICE OF THE SUPERVISOR OF SPECIAL EDUCATION
(MUSIC AND SPECIAL EDUCATION) CENTRE FOR
BLIND AND DEAFENED CHILDREN
ALLAH-BAKRE COLONY SAIDU SHARIF SWAT

Date: 1st August, 2005.

JOINING REPORT

In compliance of the Directorate General of Special Education's letter No. F-1-6/2004 dated 17.12.2004 (SPE/01), Mr. Fazal Rabi, newly appointed against the post of Music & Special Education in Special Education Centre for Blind & Deafened Children, Saidu Sharif, is hereby reported.

His joining for duties is accepted on the date of 1st August, 2005.

(MUDARRAB KHAN)
OFFICER INCHARGE

Copy for information:-

1. Director (NED) D.S.E. Islamabad.
2. Director General, D.S.E. Lahore.
3. District Officer, Saidu Sharif, Swat.
4. A.O.P.S. and Officer incharge.
5. Office Copy.
6. Official communication.

OFFICER INCHARGE

ATTACHED

Anxxure ⑥ "C"

No.F.1340(FR)/A-1
GOVERNMENT OF PAKISTAN
MINISTRY OF SOCIAL WELFARE AND SPECIAL EDUCATION
DIRECTORATE GENERAL OF SPECIAL EDUCATION
Hanna Road, Opp: NORI Hospital, G-8/4

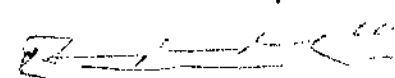
Islamabad, the 17 August, 2005

OFFICE ORDER

SUBJECT:- RECRUITMENT TO THE POST OF MALI (BS-1)

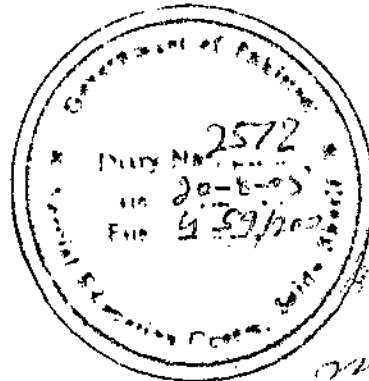
Having been selected for appointment as Mali and after having been declared medically fit by the Medical Superintendent, Civil Hospital, Saidu Sharif, Swat Mr. Fazal Rabi is appointed as Mali in the Basic Pay Scale No. 1 i.e Rs.2150-65-4100 plus usual allowances as admissible under the rules in the Scheme "Upgradation of Special Education Centre for Hearing Impaired Children" Swat under Directorate General of Special Education, Islamabad w.e.f. 1.8.2005 on the following terms and conditions:-


- i. His appointment is on a purely temporary basis. It will be treated as provisional till his character/antecedents and educational certificates/diploma have been verified by the competent authority, if not already done.
- ii. He will be on probation for a period of one year extendable for another one year by order either before or after its termination. Provided further that in the absence of an order, the period of probation shall on the expiry of the extended period be deemed to have been successfully completed in accordance with the Section-21 of the Civil Servants (Appointment, Promotion and Transfer) Rules, 1973 as amended from time to time.
- iii. His services are liable to be terminated at any time without assigning any reasons, by giving a notice for a period not less than 14 days or payment, in lieu of the notice, of a sum equivalent to his pay for 14 days or for the period by which the notice falls short of 14 days.
- iv. In case he wishes to terminate his service under Government he shall resign in writing and shall therefore continue to serve Government until his resignation is accepted. If he absents himself he shall be liable to disciplinary action, which may result in disqualification from any further employment under Government.
- v. He will have no claim or title to permanent retention/confirmation on any post, under this Directorate General on the basis of appointment.
- vi. No request for change of station of posting will be entertained for which offer is accepted before completion of three years service.

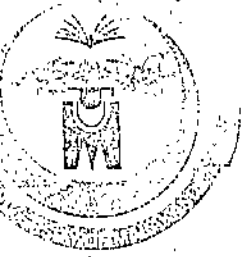

(M. MUSTAQUEEM SIDDIQUI)
DEPUTY DIRECTOR (ADMN)

Distribution:-

1. District Accounts Officer, Swat
2. Officer Incharge, SEC, HIC, Swat
3. Official concerned.




MUSTAQEEM SIDDIQUI



Anxaxo 'D' 7

University of Malakand Pakistan

DETAILED MARKS CERTIFICATE

Serial No. 005325

Name: FAZAL RABI
 Father's Name: MIAN HAIDER
 Registration No. 2007710086
 College/District: Private Candidate District Swat
 Address: Moh: Qazi Baba Vill; Zamar Dokan Mingora Teh: & Dist: Swat

Master of Arts in Pashto

Roll Number: 3652 Annual Examination 2010

Subject Name	Previous	Maximum Marks	Obtained Marks	Remarks
Paper-I	HISTORY OF PASHTO LANGUAGE AND LITERATURE	100	42	PASSED
Paper-II	ANCIENT POETRY	100	66	PASSED
Paper-III	ANCIENT PROSE	100	56	PASSED
Paper-IV	DETAILED STUDY OF RAHMAN DABA	100	56	PASSED
Paper-V	ISLAMIC STUDIES & HISTORY	100	43	PASSED
Examination held from Sep 28 To Oct 16, 2010		Result declared on 28-Jan-2011		
		500	263	

Roll Number: 22138 Annual Examination 2012

Subject Name	Final	Maximum Marks	Obtained Marks	Remarks
Paper-VI	MODERN POETRY	100	53	PASSED
Paper-VII	MODERN PROSE	100	43	PASSED
Paper-VIII	DETAILED STUDY OF KHUSHAL	100	56	PASSED
Paper-IX	CRITICAL LITERATURE/RHETORIC	100	57	PASSED
Paper-X	ESSAY ETC	100	55	PASSED
	VIVA VOCE	100	60	PASSED
Examination held from Jun 27 To Jul 23, 2012		Result declared on 27-Nov-2012		
		600	328	

Result Status:	Passed	1100	591	2nd Division
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The examination was taken in Parts
 Errors and Omissions are subject to subsequent rectification.

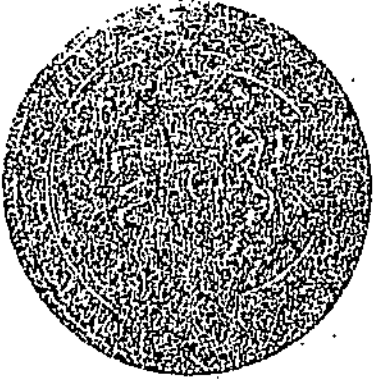
Issuance Date: 27-Nov-2012
 Prepared by: Raees Khan ShahSani
 Checked by:

Controller of Examinations
 University of Malakand

Officer Incharge
 Kasar S.E.C. For H.I.C.
 Moh: Khayyar, Mingora, Swat

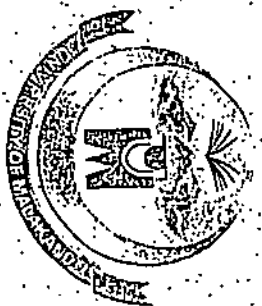
ATTACHED

8



UNIVERSITY OF MALAKAND
PAKISTAN

Serial No. 021169



Session 2009-2011



FAZAL RABI Son of MIAN HAIDER Registration No. 2007710086 Private Candidate of District Swat having passed the prescribed examination held in Jun-Jul, 2012 under Roll No. 22138 is admitted by the University of Malakand to the degree of

Master of Arts

in Pashto in Second Division

The examination was taken in Parts.

Controller of Examinations

[Signature]

Counter signed

Office Chancellor

[Signature]
[Signature]

Result Declared on 27-NOV-2012
Insurance Date 23-APR-2014

[Signature]

بکھور جناب ڈائریکٹر صاحب سوشل ویلفیئر پیپل ایجوکیشن اینڈ وومن ایمپاورمنٹ KPK بمقام پشاور

عنوان درخواست۔ تبدیلی عہدہ بمطابق تعلیم/ قابلیت

جناب عالی! سائل حسب ذیل عرض رساں ہے کہ۔

گزارش کی جاتی ہے کہ سائل کو ہسٹری پیپل ایجوکیشن سنٹر HIC سوات میں مورخہ 01/08/2005 سے مالی کی پوسٹ پر تعینات ہے جبکہ اُس وقت سائل کی تعلیم میٹرک تھی بعد میں سائل نے محکمہ کے اجازت سے جدوجہد کر کے اپنے تعلیم جاری رکھی اور F.A.BA.MA ,PST,CT.,B-ed & M-ed Special Education کو پاس کیا ہے۔ کو ہسٹری پیپل ایجوکیشن سنٹر سوات میں ٹیچر کی کمی کی وجہ سے سائل مورخہ 01/02/2009 سے اب تک مختلف کلاسز یعنی 5 th 6 & 7 کو پڑاتا آ رہا ہے۔ اب چونکہ پیپل ایجوکیشن سنٹر HIC سوات میں ٹیچر کی نئی پوسٹیں جونیئر اور سینئر ٹیچر کی Create کی گئی ہے جو کہ خالی ہے۔

پیپل ایجوکیشن کے ریکروٹمنٹ رولز کے مطابق ٹیچر کی تعیناتی کے لئے M-ed Special Education ہے۔ جس پر میں پورا اترتا ہوں اس لئے آپ صاحبان سے درخواست کی جاتی ہے کہ سائل کو کو ہسٹری پیپل ایجوکیشن میں جونیئر یا سینئر ٹیچر کی پوسٹ پر تعیناتی کے احکامات صارفہ مائے۔

لہذا استدعا ہے کہ بمنظور یہ درخواست ہذا سائل کی تقرری سائل کی اعلیٰ ایجوکیشن کے مطابق محکمہ ہذا میں جونیئر یا سینئر ٹیچر کے عہدہ پر فائز کرنے کی استدعا کی جاتی ہے۔

حرفہ

سائل: فضل ربی ولد میاں حیدر سکنہ محلہ زمردکان میٹاورہ تحصیل بابوزئی ضلع سوات

کارڈ نمبر: 1-7209387-15602-7209387-1 موبائل نمبر: 0341-5678981

Annexure "F" (10)

NO.F.4.59/2005 (F.R)

Government of Pakistan KPK

Kohsar Special education center for Hearing Impaired children swat

Swat the 23rd July 2020

To,

The Director
Social Welfare SE & WE
Department KPK Peshawar

Subject: Request for Promotion from Mali (BPS.4) to Junior Clerk BPS.11

I come to know from reliable sources, that promotion of class 4 in under process in the directorate of social Welfare SE&WE, Department Peshawar.

It is also stated for you kind information that promotion some joiner class 4 is under consideration while

I am the most qualified & senior one the seniority list of class 4.

It is worth mentioning here that I have completed my M.A and M.ed. Special Education and presently working in the special education center swat as a Mali BPS 4.

Being a qualified person in the field of special education I am also teaching to Class 7th since 2009 up till now.



Fazal Rabi
Mali BPS.4

ATTACHED



NO.F.4.59/2005 (F.R)

700

Government of Pakistan KPK

Kohsar Special Education Centre for Hearing Impaired Children Swat

Swat the 23rd July 2020.

To,

The District Officer,
Social Welfare, SE&WE,Dep:
Saidu sharif Swat.

**Subject:- REQUEST FOR PROMOTION FROM MALI(BPS-4) TO JUNIOR
CLERK (BPS-11).**

Please find enclosed herewith the self explanatory application of
Mr.Fazal Rabi (BPS-04) of this centre.

Submitted for favorable consideration please.

**OFFICER INCHARGE
SEC FOR HIC SWAT**

ATTACHED



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL
EDUCATION AND WOMEN EMPOWERMENT
JAMRUD ROAD PESHAWAR.

12

Annex - G

Dated Peshawar the 30-07-2020

ORDER

No. E-17/56/Vol-III/DSW/ 862-73, On recommendations of the Departmental promotion Committee in its meeting held on 30-07-2020, the following officials are hereby promoted to the post as recorded against their names with immediate effect.

1- JUNIOR CLERK BPS-11 TO BE PROMOTED AS SENIOR CLERK (BPS-14)

S. No	Name of Official	Place of present posting
1	Mr. Akbar Ali	GIB. Mardan
2	Mr. Taqweem Ul Haq	DO (SW) Office Dir Lower
3	Mr. Muhammad Altaf	DO (SW) Office Mansehra
4	Mr. Hamayun Khan	MR & PHC Peshawar
5	Mr. Sajid Rashid	SDC Kohat

2- AUXILIARY WORKER (BPS-7) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Shakinullah	DO (SW) Office Peshawar
2	Mr. Mujeebullah	DO (SW) Office D.I.Khan
3	Mst. Atiya Rasool	DO (SW) Office Peshawar
4	Mst. Asmat Begum	DO (SW) Office Mardan
5	Mr. Imranullah	DO (SW) Office Charsadda
6	Mst. Rehana Yasmin	DO (SW) Office D.I.Khan
7	Mr. Ifkhar Ahmad	DO (SW) Office Charsadda
8	Mr. Hidayatullah	DO (SW) Office Malakand
9	Mr. Kirayatullah	DO (SW) Office D.I.Khan
10	Mr. Akbar Newaz	DO (SW) Office Peshawar
11	Mr. Mansoor Ahmad	DO (SW) Office Mardan
12	Mr. Asad Khan	DO (SW) Office Mardan
13	Mr. Feiz Muhammad	DO (SW) Office Mansehra
14	Mr. Shahzadi Neelofar	DO (SW) Office Peshawar
15	Mst. Yasmin Begum	DO (SW) Office Mardan
16	Mr. Javed Iqbal	DO (SW) Office Swat
17	Mr. Shah Zeb	DO (SW) Office Mardan

a- STORE KEEPERS (BPS-6-8) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Abdul Qadir	DO (SW) Office Buner
2	Mr. Shamsul Arifeen	School for Deaf Children Gulbahar Peshawar
3	Mr. Sadiq Akbar	GIB. Swat
4	Mr. Nasrullah	GIB (Male) Peshawar
5	Mr. Nasrullah	GIB D.I.khan

b- CLASS-IV TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Muhammad Sajid Workshop Attendant	GIB D.I.Khan
2	Mr. Hussain Ahmad Sweeper	RCDA D.I.Khan
3	Mr. Sajjad Khan Chowkidar	Women Crises Centre Peshawar
4	Mr. Noroz Khan Chowkidar	Darul Kafala Peshawar
5	Mr. Muhammad Aman Naib Qasid	Welfare Home Kohat
6	Mr. Umar Ali Khan Chowkidar	Welfare Home Bannu

[Handwritten signature]

2- The officials on promotion will remain on probation for a period of one year extendable for a further period of one year in terms of Rules 6 (2) of the Khyber Pakhtunkhwa Civil Servant Act 1973 read with Rule 15 (1) of the Khyber Pakhtunkhwa Government Servant (Appointment, Promotion & Transfer) Rules 1989.

3- Consequent upon of their promotions, the officials are hereby posted upon the post as mentioned against their names below.

13

Posting of Senior Clerks (BPS-14)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Akbar Ali, Senior Clerk (BPS-14)	Directorate of Social Welfare
2	Mr. Taqweem Ul Haq Senior Clerk (BPS-14)	CDC Chakdara, Dir Lower
3	Mr. Muhammad Altaf Senior Clerk (BPS-14)	GIB Abbottabad
4	Mr. Hamayun Khan Senior Clerk (BPS-14)	GIB DI Khan
5	Mr. Sajid Rashid Senior Clerk (BPS-14)	GSDC Kohat

Posting of Junior Clerks (BPS-11)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Shakirullah, Junior Clerk (BPS-11)	District office SW Peshawar
2	Mr. Mujeebullah, Junior Clerk (BPS-11)	Deaf School Karak
3	Mst. Attiya Rasool, Junior Clerk (BPS-11)	District office SW Peshawar
4	Mst. Asmat Begum, Junior Clerk (BPS-11)	GSDC (F) Mardan
5	Mr. Imranullah, Junior Clerk (BPS-11)	Bacha Khan Vocational Center Charsadda
6	Mst. Rehana Yasmin, Junior Clerk (BPS-11)	District office SW D.I.Khan
7	Mr. Ifikhar Ahmad, Junior Clerk (BPS-11)	RCDA Charsadda
8	Mr. Hidayatullah, Junior Clerk (BPS-11)	RCDA Malakand
9	Mr. KifayatUllah, Junior Clerk (BPS-11)	RCDA D.I.Khan
10	Mr. Akbar Nawaz, Junior Clerk (BPS-11)	Directorate of Social Welfare
11	Mr. Mansoor Ahmad, Junior Clerk (BPS-11)	Bacha Khan Vocational Center Nowshera
12	Mr. Asad Khan, Junior Clerk (BPS-11)	District Office, SW Swabi
13	Mr. Faiz Muhammad, Junior Clerk (BPS-11)	District Office SW Torghar
14	Mst. Shahzadi Neelofar, Junior Clerk (BPS-11)	District office SW Charsadda
15	Mst. Yasmin Begum, Junior Clerk (BPS-11)	GSDC Swabi
16	Mr. Javed Iqbal, Junior Clerk (BPS-11)	District office SW Swat
17	Mr. Shah Zeb, Junior Clerk (BPS-11)	MR&PH Swabi
18	Mr. Abdul Qadir, Junior Clerk (BPS-11)	Welfare Home Buner
19	Mr. Shamsul Arifeen, Junior Clerk (BPS-11)	District Office SW Abbottabad

21	Mr. Nasrullah, Junior Clerk (BPS-11)	GIB (M) Peshawar
22	Mr. Nasrullah, Junior Clerk (BPS-11)	District office SW Chitral
23	Mr. Muhammad Sajid, Junior Clerk (BPS-11)	Bacha Khan Women Vocational Center Karak
24	Mr. Hussain Ahmad, Junior Clerk (BPS-11)	District Office SW D.I.Khan
25	Mr. Sajjad Khan, Junior Clerk (BPS-11)	Welfare Home Hangu
26	Mr. Noroz Khan, Junior Clerk (BPS-11)	SSMC Chakdara Dir (Lower)
27	Mr. Muhammad Aman, Junior Clerk (BPS-11)	GSDC Kohat
28	Mr. Umar Ali Khan, Junior Clerk (BPS-11)	District Office SW Lakki Marwat
29	Mr. Sajid Ali, Junior Clerk (BPS-11)	Directorate of Social Welfare
30	Mr. Naeem Kokar, Junior Clerk (BPS-11)	Welfare Home Buner

14

Sd—
Director
Social Welfare, Spl: Edu: & WE
Khyber Pakhtunkhwa

Copy to:

- 1- The Accountant General, Khyber Pakhtunkhwa
- 2- The Concerned District Account Officer in Khyber Pakhtunkhwa
- 3- PS to Minister for Social Welfare, Special Education & Women Empowerment, Department, Khyber Pakhtunkhwa
- 4- PS to Secretary, Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa
- 5- The Concerned District Officer, Social Welfare in Khyber Pakhtunkhwa
- 6- Deputy Director (MIS) Social Welfare Department, Khyber Pakhtunkhwa
- 7- The concerned Incharge of institute of Social Welfare in Khyber Pakhtunkhwa
- 8- PA to Director, Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa
- 9- Assistant Director (E-1), Directorate of Social Welfare
- 10- All the official concerned
- 11- Personal file

Deputy Director (Admin)
Social Welfare, SE & WE 30/7/22
-Khyber Pakhtunkhwa

ATTACHED

محدث جناب ڈائریکٹر سوشل ویلفیئر ڈیپارٹمنٹ لہور

Annex H

درخواست: حکمانہ اپیل برائے ترقی

جناب عالی!

موجودہ گناراش کی جاتی ہے کہ سائل

آپ کے زیر سپارہ مالی کام کر رہا ہے سائل نے ایم اے اینٹو تک تعلیم حاصل کی ہے اور سائل کو آج تک

کوئی ترقی نہیں دی گئی ہے۔ اور ہر دفع ترقی سے محروم رکھا گیا ہے۔

اس لیے سائل کا جزاۃ التماس کرتا ہے کہ

سائل کو مالی کی عہدہ سے جوڈیئر لہرک کے عہدہ

پر ترقی دی جائے سائل عمر عیسٰی سن 1964 کا

العارفی

موزعہ: 15/12/2020

آلہ خاں سردار، قضاہ

مالی

VAKALATNAMA

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

_____ OF 2021

Fazal Rabbi (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt of K.P & others (RESPONDENT)
(DEFENDANT)

I/We Fazal Rabbi

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, 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. ____/____/2020

Fazal Rabbi Reedy
CLIENT(S)

ACCEPTED
NOOR MOHAMMAD KHATTAK
15401-0705985-5
BC-08-0853

&
Kamran Khan
KAMRAN KHAN
Afrasiab Khan Wazir
AFRASIAB KHAN, WAZIR
Haider Ali
HAIDER ALI
ADVOCATES

OFFICE:
Flat No.4, Upper Floor,
Juma khan plaza near (FATA) Secretariat
Warsak road Peshawar.
Mobile No. **0345-9383141**

BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 4747 of 2021

Mr. Fazal Rabbi (Appellant)

Versus

Government of Khyber Pakhtunkhwa

AFFIDAVIT

I Syed Nabi Gul, Superintendent (Lit), Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of the accompanying reply/comment are true and correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'ble Tribunal.



224-05
2022

DEPONENT

CNIC No.17101-0377128-9

Cell# 03469148582

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Mr. Fazal Rabbi----- (Appellant)

Versus

Government of Khyber Pakhtunkhwa

INDEX

S. No.	Detail of Documents	Page No.
1.	Affidavit	1
2.	Reply/comments	2-4
3.	Annex-I	5-12
4.	Annex-II	13-21
5.	Annex-III	22-25



DEPONENT

CNIC No.17101-0377128-9

Cell# 0346-9148582

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service appeal No. 4747/2021

**MR. Fazal Rabbi, Mali (BPS-04), Govt. Middle School Ganj Mandi
Peshawar..... APPELLANT**

VERSUS

1. Secretary Zakat, Ushr, Social Welfare, Special Education & Women Empowerment Department, Peshawar.
2. Director, Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa Peshawar
3. District Officer, Social Welfare, Swat.....**Respondents**

PARA-WISE COMMENTS ON BEHALF OF THE RESPONDENTS NO. 1,2 & 3.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. The appellant has shown his presence at Govt. Middle School Ganj Mandi Peshawar. However the Respondent / Department has no such like entity in the said premises. Therefore, the appeal is not maintainable in its present form.
2. The appellant has got no cause of action
3. The appeal is based on malafide intentions.
4. The appellant has no locus standi.
5. The appeal in hand has badly been time barred.
6. The appellant has not come to this Honorable Tribunal with clean hands.
7. The appellant has concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
8. The appeal is liable to be dismissed for non joinder / misjoinder of necessary parties.
9. The appeal is against the prevailing law & rules.

FACTS

1. Incorrect, hence denied. That the appellant was initially appointed by the Federal Government of Pakistan in BPS-1. His services were devolved under 18th Constitutional amendment and was absorbed in the year 2018 vide Notification No. DI/Absorption/Dev-Emp/DSW/333-40 dated 31.01.2018 (Annex-1).


2. Pertains to record.
3. Pertains to record.
4. Incorrect, hence denied. That the letter dated 23.07.2020 (Annex-II) has no dairy number therefore there is no legal value of the said document, also the application is not addressed through proper channel.
5. Correct to the extent that the Department has issued promotion order dated 30.07.2020. It is to clarify that the appellant was an employee of the devolved entity and was remained on deputation up to 30.01.2018, while properly absorbed in the provincial cadre vide order dated 31.01.2018. Hence the appellant was not discriminated. It is further to clarify that the appellant is a devolved employee working in devolved entity and lieu therein drawing a Health Professional Allowance at the rate of one running basic pay thus stands a separate cadre and not transferable amongst the officials who were promoted as envisaged under Section-9 of Government servant Act, 1973 (Annex-III). In this regard draft service rules for Special Education Institutions employees are under consideration with the Standing Service Rules Committee (SSRC). It is important to inform the Honorable Court that the tentative seniority list of the appellant and his other colleagues is prepared separately and he stands at S.No. 11 and on framing the requisite service rules, he will be promoted on his own turn (Annex-V).
6. Incorrect, hence denied. As and when the framing of service rules are finalized, the promotion will be granted on the basis of seniority cum fitness to the appellant on his due turn.
7. Incorrect, hence denied. The appellant has no cause of action to file the instant appeal in the absence of proper service rules.

GROUNDS

- A. Incorrect, hence denied. The appellant is a devolved employee and service rules are in process for such like case as explained in Para-5 above. As and when the process is completed, the promotion of the appellant will be issued in accordance with rules and on due turn of the appellant.
- B. Incorrect, hence denied. The respondents has not violated any constitutional law and no discrimination has been made to the appellant.
- C. Incorrect, hence denied. The factual position has been explained in the preceding paras.

- D. Pertains to record. As far as the length of service of the appellant is concerned, the appellant was appointed in the year 2005 on regular basis and till filing of this service appeal, his total length of service counts 16 years approximately.
- E. Incorrect, hence denied. The respondents are law abiding civil servants and cannot think about violation of prevailing law, rules and policy.
- F. Incorrect, hence denied. As explained in the preceding paras that the appellant will be promoted after fulfilling the pre-requisite codal formalities.
- G. The respondents seek permission to advance other grounds at the time of hearing.

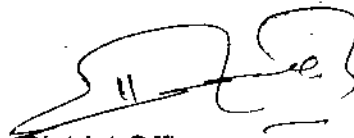
In view of the above mentioned factual position, it is humbly prayed that the service appeal being devoid of any merit, may graciously be dismissed with cost please.



Secretary to Government of Khyber
Pakhtunkhwa, Social Welfare, Special
Education and Women Empowerment
Department
(Respondent No. 1)



Director
Social Welfare, Special Education
and Women Empowerment Khyber
Pakhtunkhwa Peshawar
(Respondent No. 2)



District Officer
Social Welfare Department
Swat
(Respondent No. 3)

No. DI/Absorption/Dev-Emp/DSW/ 3331-40 In pursuance of Section II-B of the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 1973, (Khyber Pakhtunkhwa Act No. XVth of 1973) the following devolved employees of the Federal Government holding various posts in Federal Government entities, on regular basis before the commencement of the 18th constitutional (amendment) Act 2010 (Act No. X of 2010) shall be deemed to be civil servants of the Province for all intents and purposes under the Act *ibid*.

S.#	Name	Designation	BPS
1	2	3	4
1	Mr. Nasir Khan Lodhi	Admin Officer	16
2	Mr. Muhammad Rauf	- do -	16
3	Mr. Daud Khan	S/S Stenographer	16
4	Mr. Noor Wahid	Office Assistant	16
5	Mr. Rehmat Ullah	- do -	16
6	Mr. Eldayat Ullah	- do -	16
7	Mr. Abid Ali Shah	- do -	16
8	Mr. Javed Iqbal Naseem	- do -	16
9	Mr. Munir Khan	- do -	16
10	Mr. Ishtiaq Ahmad	- do -	16
11	Mr. Muhammad Munir	- do -	16
12	Mr. Muhammad Sharif	- do -	16
13	Mr. Majid Ali Shah	- do -	16
14	Mr. Muhsin Ali	Computer Operator	16
15	Mr. Tehmasab Khalid	- do -	16
16	Mr. Wajid Maqsood	- do -	16
17	Mr. Jawad Ali	- do -	16
18	Mr. Adnan Ali	- do -	16
19	Mr. Muhammad Asif	- do -	16
20	Mrs. Amina Shafiq	- do -	16
21	Mr. Khalid Mehmood	- do -	16
22	Mr. Rambail Khan	J/Scale Stenographer	14
23	Mr. Sardar Ullah Shah	- do -	14
24	Mr. Hayat Zada	- do -	14
25	Mr. Fazal Wahab	- do -	14
26	Mr. Asif Iqbal	- do -	14
27	Mr. Naimat Ullah	- do -	14
28	Mr. Fazal Rehman	- do -	14

29	Mr. NURU AGHMANI	- do -	14
30	Mr. Ahmad Ali	- do -	14
31	Mr. Salah Ud Din	- do -	14
32	Mr. Muhammad Faizan	- do -	14
33	Mr. Khalid Khan	Senior Clerk	14
34	Mr. Gul Sher	- do -	14
35	Mr. Ajab Khan	- do -	14
36	Mr. Jafar Shah	- do -	14
37	Mr. Habib Ullah	- do -	14
38	Mr. M. Afzal Khan	- do -	14
39	Mr. Muhammad Nauman	- do -	14
40	Mr. Nizam-Ud-Din	- do -	14
41	Mr. Zawar Ali	- do -	14
42	Mr. Sher Azim	- do -	14
43	Mr. Said Alam	Junior Clerk	11
44	Mr. Furqan Jamil	- do -	11
45	Mr. Haroon Rashid	- do -	11
46	Mr. Imran Khan	- do -	11
47	Mr. Muhammad Ayaz	- do -	11
48	Mr. Siraj Ud Din	- do -	11
49	Mr. M. Saeed Khan	- do -	11
50	Mr. Imran Khan	- do -	11
51	Mrs. Seema Anjum	Nursery Teacher	15
52	Mrs. Hina Rehman	- do -	15
53	Mr. Kamal Yousaf	Music Teacher	15
54	Mr. M. Iqbal Khan	Junior Instructor	15
55	Mr. Amjad Ali	- do -	15
56	Mr. Tanveer Ahmed	- do -	15
57	Mrs. Farwa Rubab	- do -	15
58	Mr. Kamran Yousafzai	J. Computer Instructor	15
59	Mr. Mehmood Alam	- do -	15
60	Mr. Rahmat Nabi	- do -	15
61	Mr. Zulfiqar Wazir	- do -	15
62	Mr. Muhammad Younas	- do -	15
63	Mr. Rizwan Qayum	- do -	15
64	Ms. Amina Mushtaq	Vocational Instructor	15
65	Mrs. Anwar Sabih	- do -	15
66	Mrs. Shagufta Nasreen	- do -	15
67	Mrs. Shabana Tabassum	- do -	15
68	Mrs. Nasreen Begum	Vocational Teacher	12
69	Mrs. Talat Gul Farin	- do -	12
70	Mrs. Shazia Parveen	- do -	12
71	Mr. Muhammad Siddique	do	12
72	Mr. Wajid Ali	do	12

19

15 Mrs. IV 42301 Kayveer do 12

74	Mrs. Sabra Gul	- do -	12
75	Mrs. Robeena Mughal	- do -	12
76	Mr. Amjad Hussain	- do -	12
77	Mr. Qamar Nazir	- do -	12
78	Mrs. Amraiz Begum	- do -	12
79	Mrs. Yasmin	- do -	12
80	Mrs. Fehmecda Syed	- do -	12
81	Mrs. Shahcen Begum	- do -	12
82	Mrs. Fakhri	- do -	12
83	Ms. Faryal Afridi	- do -	12
84	Ms. Waheeda Gul	- do -	12
85	Mrs. Nuzhat Rehman	- do -	12
86	Mr. Wall Marjan	Workshop Technician	12
87	Mr. Asif Khan	- do -	12
88	Mrs. Riffat Jabeen	- do -	12
89	Mr. Irfan Ullah	Brail Teacher	12
90	Mr. Abdul Hai	- do -	12
91	Mr. Habib Ullah	- do -	12
92	Mr. Muhammad Ishaq	- do -	12
93	Mrs. Uzma Naeem	- do -	12
94	Mr. Asif Mehmood	- do -	12
95	Mr. Tauheed Ali Raza	- do -	12
96	Mrs. Zarbeena	- do -	12
97	Mr. Tajammul Hussain	- do -	12
98	Mr. Rafi Ullah	Qari	10
99	Mr. Masoud Jan	PTI	10
100	Mr. Muhammad Nauman	- do -	10
101	Mrs. Feroza Bibi	Voc Training Instructor	08
102	Mr. Zahid Ali	- do -	08
103	Mr. Sultan Wali Khan	- do -	08
104	Mrs. Nasima Zulfiqar Ali	- do -	08
105	Mrs. Shazia Bibi	- do -	08
106	Mrs. Sumayya	- do -	08
107	Mr. Alamgir Khan	- do -	08
108	Mrs. Nasira Bibi	LHV	09
109	Mrs. Nasreen	- do -	09
110	Mrs. Bibi Rani	- do -	09
111	Mrs. Bulbul Jamal	Adult Literacy Worker	08
112	Mrs. Farida Bibi	- do -	08
113	Mr. Yousaf Ali Khan	- do -	08
114	Mr. Ali Zeb Khan	Recreation Youth Worker	07

115 Mr. Sharif Khan do 07

116 Mr. Afzal Khan do 07

20

118	Mr. Mukhtar Khan	- do -	07
119	Mr. Bakht Amir Shah	Driver	07
120	Mr. Aslam Perwaiz	- do -	07
121	Mr. Sher Umer	- do -	07
122	Mr. Muhammad Riaz	- do -	07
123	Mr. Amcer Muhammad	- do -	07
124	Mr. Ahmad Noor	- do -	07
125	Mr. Naveed Ahmad	- do -	07
126	Mr. Naveed Muhammad	- do -	07
127	Mr. Abdul Sami	- do -	07
128	Mr. Muhammad Bashir	- do -	07
129	Mr. Adnan	- do -	07
130	Mr. Wilayat Ali	- do -	07
131	Mr. Himayat Ullah	- do -	07
132	Mr. Muhammad Sulman	- do -	07
133	Mr. Muhammad Ramzan	- do -	07
134	Mr. Rohman Ullah	- do -	07
135	Mr. Aown Abbas	- do -	07
136	Mr. Sikandar Khan	- do -	07
137	Mr. Khalid	- do -	07
138	Mr. Ahmad Bilal	- do -	07
139	Mr. Maqsood Ahmad Baig	- do -	07
140	Mr. Karim Panah	Attendant	05
141	Mr. Ahmad Ali	- do -	05
142	Mr. Siraj Ahmad	- do -	05
143	Mr. Syed Ali Khan	- do -	05
144	Mr. Waqas Hussain	- do -	05
145	Mr. Sajjad Ahmad	- do -	05
146	Mr. Shabbir Ali	- do -	05
147	Mr. Asfandiar	- do -	05
148	Mr. Shah Jehan	- do -	05
149	Mr. Naik Ansal Khan	- do -	05
150	Mr. Shah Nawaz	- do -	05
151	Mr. Irfanullah	- do -	05
152	Mr. Zahid Ali	- do -	05
153	Mr. Farhan Ali	- do -	05
154	Mr. Asad Mehmood	- do -	05
155	Mr. Ismail Khan	- do -	05
156	Mr. Siraj Ahmad	- do -	05
157	Mr. Malik Riaz	- do -	05
158	Mr. Shakir Ullah	- do -	05

159 Muhammad Saifeer do 05

160 Abdul Wahab do 05

21

5

161	Mr. Johar Ali	- do -	05
162	S. Amjad Ali Shah	- do -	05
163	Mr. Siraj Khan	- do -	05
164	Mr. Muhammad Wisal	- do -	05
165	Mr. Misal Khan	- do -	05
166	Mr. Tariq Zada	- do -	05
167	Mr. Zahid Shah	- do -	05
168	Mr. Sajjad Ali	- do -	05
169	Mr. Muhammad Ishaq	- do -	05
170	Mr. Akhtar Ali	- do -	05
171	Mr. Muhammad Daud	- do -	05
172	Mr. Askar Khan	- do -	05
173	Mr. Waheed Jan	- do -	05
174	Mr. Asmat Gul	- do -	05
175	Mr. Ifkhar Khan	- do -	05
176	Mr. Waqas Rashid	- do -	05
177	Mr. Lal Muhammad	- do -	05
178	Mr. Hanif Khan	- do -	05
179	Mr. Pir Madar	- do -	05
180	Mr. Hazrat Bilal	- do -	05
181	Mr. Nawab Zada	- do -	05
182	Mr. Rahman Ali	- do -	05
183	Mr. Fazal Amin	- do -	05
184	Mr. Humair Inayat Malik	- do -	05
185	Mst. Mahajireen Bibi	Aya	05
186	Mrs. Tahira Naqvi	- do -	05
187	Mrs. Azra Bukhari	- do -	05
188	Mrs. Ulfat Begum	- do -	05
189	Mrs. Shagufa	- do -	05
190	Mrs. Jameela Khatun	- do -	05
191	Mrs. Ambareen Ismail	- do -	05
192	Mrs. Rohana Bibi	- do -	05
193	Mst. Naheeda Bibi	- do -	05
194	Mr. Sohail Ahmad	Naib Qasid	04
195	Mr. Sardar Ali	- do -	04
196	Mr. Faiz-Ur-Rahman	- do -	04
197	Mr. Liaqat Ali	- do -	04
198	Mr. Farhad Ali Shah	- do -	04
199	Mr. Nadar Khan	- do -	04
200	Mr. Asifullah	- do -	04

201 Mr. Ghulamullah do 04

202 Mr. Muhammad Ghaffoor do 04

203 Mr. Mukhtar Shah do 04

204 Mr. Amjad Hussain do 04

22

206	Mr. Bakht Zamin	U.D	04
207	Mr. Mir Shah Jehan	- do -	04
208	Mr. Muhammad Shakeel	- do -	04
209	Mr. Tahir	- do -	04
210	Mr. Shaukat Hussain	- do -	04
211	Mr. Najam Khan	- do -	04
212	Mr. Zahir Ullah	- do -	04
213	Mr. Bakht Zaman	- do -	04
214	Mr. Shakri Muhammad	- do -	04
215	Mr. Khush Qadam	- do -	04
216	Mr. Fazlo Maula	Chowkidar	04
217	Mr. Muhammad Ikram	- do -	04
218	Mr. Khan Zaib	- do -	04
219	Mr. Zafar Ali	- do -	04
220	Mr. Said Azam	- do -	04
221	Mr. Nizam Wali	- do -	04
222	Mr. Bashir	- do -	04
223	Mr. Ibad Ullah	- do -	04
224	Mr. Adnan	- do -	04
225	Mr. Muhammad Bilal	- do -	04
226	Mr. Muzafar Shah	- do -	04
227	Mr. Sajid Ahmad	- do -	04
228	Mr. Muhammad Hafcoz	- do -	04
229	Mr. Ikram Ali	- do -	04
230	Mr. Shahid Hussain	- do -	04
231	Mr. Muhammad Nawaz	- do -	04
232	Mr. Sad Bad Shah	- do -	04
233	Mr. Muhammad Zafar	- do -	04
234	Mr. Gulab Khan	- do -	04
235	Mr. Faisal Khan	- do -	04
236	Mr. Muhammad Abbas	- do -	04
237	Mr. Nisar Ali	- do -	04
238	Mr. Hayat Khan	- do -	04
239	Mr. Tanti Muhammad	- do -	04
240	Mr. Muhammad Azam	- do -	04
241	Mr. Farid Ullah Jan	- do -	04
242	Mr. Murad Ullah	- do -	04
243	Mr. Akbar Ali	Mali	04
244	Mr. Musafir Gul	- do -	04
245	Mr. Lal Bahadar	- do -	04
246	Mr. Faizan Akhtar	do	04
247	Mr. Suhbat Khan	do	04
248	Mr. Qul Muhammad	do	04

23

250	Mr. Imran Ali	- do -	04
251	Mr. Zafar Hussain	- do -	04
252	Mr. Muhammad Shafiq	- do -	04
253	Mr. Fazl Rabi	- do -	04
254	Mr. Shah Nawaz	Sanitary Worker	04
255	Mr. Javed Iqbal	- do -	04
256	Mr. Riz Ahmad	- do -	04
257	Mr. Ikram Ullah	- do -	04
258	Mr. Sajid Ullah	- do -	04
259	Mr. Wasif Ali Rauf	- do -	04
260	Mr. Ayaz	- do -	04
261	Mst. Fazilat Bibi	- do -	04
262	Mr. Daniyal Masih	- do -	04
263	Ms. Maryam Salim	- do -	04
264	Mst. Nahced Bogun	- do -	04
265	Mr. Siddiquo Ali	- do -	04
266	Mr. Amjad Ali	- do -	04
267	Mr. Rahid Ali	- do -	04
268	Mr. Muhammad Irshad	- do -	04
269	Mr. Iqbal Hussain	- do -	04
270	Mr. Haji Ahmad	- do -	04
271	Mr. Arshad Ali	- do -	04
272	Mr. Raza Muhammad	- do -	04
273	Mr. Suhail	- do -	04
274	Mr. Seyad Ali	- do -	04
275	Mr. Saleem Khan	- do -	04
276	Mr. Kamran Khan	- do -	04
277	Mr. Abid Jan	- do -	04
278	Mr. Abbas Ali	- do -	04
279	Mr. Javed Inshim	- do -	04
280	Mr. Fazal Khaliq	- do -	04
281	Mr. Tariq Masih	- do -	04
282	Mst. Hasina Bibi	Dni / Midwife	04
283	Mst. Sharafat Nisa	- do -	04
284	Mr. Hameed Gul	Cook	05
285	Mr. Javed Ali	- do -	04
286	Syed Fawad Ali	- do -	04
287	Mr. Nasir Pervaiz	Cook Helper	04
288	Mr. Hafiz Ur Rahman	Hostel Bearer	05
289	Mr. Hazrat Ali	- do -	05
290	Mr. Asad Ali	- do -	05

291 Mr. Waseem Arshad do 05

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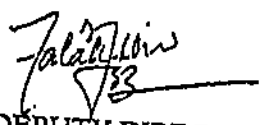
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-Sd-
DIRECTOR
Social welfare, Special Education &
Women Empowerment Department
Khyber Pakhtunkhwa

Endst No. and Date even

Copy forwarded for information and necessary action to the:

1. The Section Officer-VI Social Welfare, SE & WE Department-Khyber Pakhtunkhwa.
2. Secretary to Govt of KP Establishment Department Khyber Pakhtunkhwa.
3. Secretary to Govt of KP Finance Department Khyber Pakhtunkhwa.
4. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
5. PSO to Chief Secretary Khyber Pakhtunkhwa.
6. Accountant General Khyber Pakhtunkhwa.
7. Director Information Khyber Pakhtunkhwa.
8. All In-charges of Devolved Institutions Khyber Pakhtunkhwa.
9. PA to Director Social Welfare, SE & WE Khyber Pakhtunkhwa.


DEPUTY DIRECTOR
(ISDC)
Social welfare, Special Education &
Women Empowerment Department
Khyber Pakhtunkhwa

Anxxare

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NO.F.4.59/2005 (F.R)

Government of Pakistan KPK

Kohsar Special education center for Hearing Impaired children swat

Swat the 23rd July 2020

To,

The Director
Social Welfare SE & WE
Department KPK Peshawar

Subject: Request for Promotion from Mali (BPS.4) to Junior Clerk BPS.11

I come to know from reliable sources, that promotion of class 4 in under process in the directorate of social Welfare SE&WE, Department Peshawar.

It is also stated for you kind information that promotion some joiner class 4 is under consideration while

I am the most qualified & senior one the seniority list of class 4.

It is worth mentioning here that I have completed my M.A and M.ed. Special Education and presently working in the special education center swat as a Mali BPS 4.

Being a qualified person in the field of special education I am also teaching to Class 7th since 2009 up till now.



Fazal Rabi
Mali BPS.4

ATTACHED



700
NO.F.4.59/2005 (F.R)
Government of Pakistan KPK

Kohsar Special Education Centre for Hearing Impaired Children Swat

Swat the 23rd July 2020.

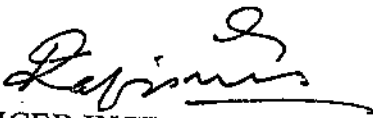
To,

The District Officer,
Social Welfare, SE&WE,Dep:
Saidu sharif Swat.

Subject:- **REQUEST FOR PROMOTION FROM MALI(BPS-4) TO JUNIOR
CLERK (BPS-11).**

Please find enclosed herewith the self explanatory application of
Mr.Fazal Rabi (BPS-04) of this centre.

Submitted for favorable consideration please.


OFFICER INCHARGE
SEC FOR HIC SWAT



Civil Servants Act, 1973 (Act No. LXXI of 1973)

An Act to regulate the appointment of persons to, and the terms and conditions of Service of persons in, the service of Pakistan.

WHEREAS it is expedient to regulate by law, the appointment of persons to, and the terms and conditions of service of persons, in the service of Pakistan, and to provide for matters connected therewith or ancillary thereto;

It is hereby enacted as follows:-

1. Short title, application and commencement.- (1) This Act may be called the Civil Servants Act, 1973.

(2) it applies to all civil servants wherever they may be.

(3) It shall come into force at once.

2. Definitions.- (1) In this act, unless there is anything repugnant in the subject or context,-

(a) "ad hoc appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment, pending recruitment in accordance with such method;

(b) "civil servant" means a person who is a member of an All-Pakistan Service or of a civil service of the Federation, or who holds a civil post in connection with the affairs of the Federation, including any such post connected with defence, but does include-

(i) a person who is on deputation to the Federation from any Province or other authority;

(ii) a person who is employed on contract, or on work-charged basis or who is paid from contingencies; or

(iii) a person who is "worker" or "workman" as defined in the Factories Act, (XXV of 1934), or the Workman's Compensation Act, 1923 (VIII of 1923);

(c) "initial appointment" means appointment made otherwise than by promotion or transfer.

(d) "pay" means the amount drawn monthly by a civil servant as pay and includes technical pay, special pay, personal pay and any other emoluments declared by the prescribed authority to be pay;

(e) "permanent post" means a post sanctioned without limit of time;

(f) "prescribed" means prescribed by rules;

(g) "rules" means rules made or deemed to have been made under this Act;

(h) "selection authority" means the Federal Public Service Commission, a departmental selection board, departmental selection committee or other authority or body on the recommendation of or in consultation with which any appointment or promotion, as may be prescribed, is made; and

(i) "temporary post" means a post other than a permanent post.

(2) For the purposes of this Act, an appointment, whether by promotion or otherwise, shall be deemed to have been made on regular basis if it is made in the prescribed manner.

CHAPTER II.-TERMS AND CONDITIONS OF SERVICE OF CIVIL SERVANTS

3. Terms and conditions.- (1) The terms and conditions of service of a civil servant shall be as provided in this Act and the rules.

(2) The terms and conditions of service of any person to whom this Act applies shall not be varied to his disadvantage.

4. Tenure of office of civil Servants.- Every civil servant shall hold office during the pleasure of the President.

5. Appointments.- Appointments to an All-Pakistan Service or to a civil service of the Federation or to a civil post in connection with the affairs of the Federation, including any civil post connected with defence, shall be made in the prescribed manner by the President or by a person authorized by the President in that behalf.

6. Probation.- (1) An initial appointment to a service or post referred to in section 5, not being an ad hoc appointment, shall be on probation as may be prescribed.

(2) Any appointment of a civil servant by promotion or transfer to a service or post may also be made on probation as may be prescribed.

Where, in respect of any service or post, the satisfactory completion of probation includes the passing of a prescribed examination, test or course or successful completion of any training, a person appointed on probation to such service or post who, before the expiry of the original or extended period of his probation, has failed to pass such examination or test or to successfully complete course or the training shall, except as may be prescribed otherwise.-

(a) if he was appointed to such service or post by initial recruitment, be discharged;
or (b) if he was appointed to such service or, post by promotion or transfer, be reverted

to the service or post from which he was promoted or transferred and against which he holds a lien or, if there be no such service or post, be discharged.

Provided that, in the case of initial appointment to a service or post, a civil servant shall not be deemed to have completed his period of probation satisfactorily until his character and antecedents have been verified as satisfactory in the opinion of the appointing authority.

7. Confirmation.- (1) A person appointed on probation shall, on satisfactory completion of his probation, be eligible for confirmation in a service or, as the case may be, a post as may be prescribed.

(2) A civil servant promoted to a post on regular basis shall be eligible for confirmation after rendering satisfactory service for the period prescribed for confirmation therein.

(3) There shall be no confirmation against any temporary post.

(4) A civil servant who, during the period of his service, was eligible to be confirmed in any service or against any post retires from service before being confirmed shall not, merely by reason of such retirement, be refused confirmation in such service or post or any benefits accruing there from.

(5) Confirmation of a civil servant in a service or post shall take effect from the date of occurrence of permanent vacancy in that service or post or from the date of continuous officiation, in such service or post, whichever is later.

8. Seniority.- (1) For proper administration of a service, cadre, or post the appointing authority shall cause a seniority list of the members for the time being of such service, cadre or post to be prepared, but nothing herein contained shall be construed to confer any vested right to a particular seniority in such service, cadre or post as the case may be.

(2) Subject to the provisions of sub-section (1), the seniority of a civil servant shall be reckoned in relation to other civil servants belonging to the same service or cadre whether serving in the same department or office or not, as may be prescribed.

(3) Seniority on initial appointment to a service, cadre or post shall be determined as may be prescribed.

(4) Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from the date of regular appointment to that post.

Provided that civil servants who are selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

9. Promotion - (1) A civil servant possessing such minimum qualifications as may be prescribed shall be eligible for promotion to a higher post for the time being reserved under the rules for departmental promotion in the service or cadre to which he belongs:

"Provided that the posts of -

(a) Additional Secretary and Senior Joint Secretary may, in the public interest, be filled by promotion from amongst officers of regularly constituted Occupational Groups and services holding, on regular basis, posts in Basic Pay Scale 20; and
(b) Secretary may, in the public interest, be filled by promotion from amongst officers of regularly constituted Occupational Groups and services holding, on regular basis, posts in Basic Pay Scale 21, in such manner and subject to such conditions as may be prescribed."

(2) A post referred to in sub-section (1) may either be a selection post or a non-selection post to which promotions shall be made as may be prescribed-

(a) in the case of a selection post, on the basis of selection on merit; and
(b) in the case of a non-selection post, on the basis of seniority-cum-fitness.

(3) Promotion to posts in basic pay scales 20 and 21 and equivalent shall be made on the recommendations of a Selection Board which shall be headed by the Chairman, Federal Public Service Commission.

10. Posting and transfer.- Every civil servant shall be liable to serve anywhere within or outside Pakistan, in any equivalent or higher post under the Federal Government, or any Provincial Government, or local authority, or a corporation or body set up or established by any such Government;

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region:

Provided further that, where a civil servant is required to serve in a post outside his service or cadre, his terms and conditions of service as to his pay shall not be less favorable than those to which he would have been entitled if he had not been so required to serve.

11. Termination of service.- (1) The service of a civil servant may be terminated without notice-

(i) during the initial or extended period of his probation:

Provided that, where such civil servant is appointed by promotion on probation or, as the case may be, is transferred from one grade, service, or post to another service, cadre or post, his service shall not be so terminated so long as he holds a lien against his former post in such service, cadre or post, but he shall be reverted to his former service, cadre or post, as the case may be.

(ii) on the expiry of the initial or extended period of his employment; or

(iii) if the appointment is made ad hoc terminable on the appointment of a person on the recommendation of the selection authority, on the appointment of such person.

(2) Where, on the abolition of a post or reduction in the number of posts in a cadre or service, the services of a civil servant are required to be terminated, the person whose services are terminated shall ordinarily be the one who is the most junior in such cadre or service.

(3) Notwithstanding the provisions of sub-section (1), but subject to the provisions of sub-section (2), the service of a civil servant in temporary employment or appointed ad hoc shall be liable to termination on fourteen days' notice or pay in lieu thereof.

"11 A. Absorption of civil servants rendered surplus.- Notwithstanding anything contained in this Act, the rules, agreement, contract or the terms and conditions of service a civil servant who is rendered surplus as a result of re-organization or abolition of a Division, department, office or abolition of a post in pursuance of any Government decision may be appointed to a post, carrying basic pay scale equal to the post held by him before such appointment, if he possesses the qualifications and fulfils other conditions applicable to that post:

Provided that where no equivalent post is available he may be offered a lower post in such manner, and subject to such conditions, as may be prescribed and, where such civil servant is appointed to a lower post the pay being drawn by him in the higher post immediately preceding his appointment to a lower post shall remain protected."

12. Reversion to a lower post, etc.- (1) A civil servant appointed to a higher post on ad hoc, temporary or officiating basis shall be liable to reversion to his lower post.

(2) No civil servant shall be dismissed or removed from service or reduced in rank by an authority subordinate to that by which he was appointed.

(3) No such civil servant as aforesaid shall be dismissed or removed from service, or reduced in rank, until he has been given a reasonable opportunity of showing cause against the action proposed to be taken against him:

Provided that this sub-section shall not apply:-

(i) where a civil servant is dismissed or removed from service or reduced in rank on the ground of conduct which has led to his conviction on a criminal charge; or

(ii) where the President or any person authorized by him under the rules is satisfied, for reasons to be recorded in writing, that in the interest of the security of Pakistan or any part thereof, it is not expedient to give to that civil servant such an opportunity."

12A Certain persons to be liable to removal, etc.- Notwithstanding anything contained in this Act or in the terms and conditions of a civil servant appointed or promoted during the period from the first day of January, 1972, to the fifth day of July, 1977, the President or a person authorized by him in this behalf may,-

(a) without notice, remove such a civil servant from service or revert him to his lower post or grade, as the case may be, on such date as the President or, as the case may be, the person so authorized may, in the public interest, direct; or

(b) in a case where the appointment or promotion of such a civil servant is found by the President or, as the case may be, the person so authorized to suffer from a deficiency in the minimum length of service prescribed for promotion or appointment to the higher grade, direct, without notice, that seniority in such case shall count from the date the civil servant completes the minimum length of service in such appointment or promotion as the case may be.

"13. Retirement from service.- (1) A civil servant shall retire from service-

(i) on such date after he has completed twenty years of service qualifying for pension or other retirement benefits as the competent authority may, in public interest, direct; or

(ii) where no direction is given under clause (i), on the completion of the sixtieth year of his age.

(2) No direction under clause (i) of sub-section (1) shall be made until the civil servant has been informed in writing of the grounds on which it is proposed to make the direction, and has been given a reasonable opportunity of showing cause against the said direction.

Explanation: In this Section, "competent authority" means the appointing authority prescribed in rule 6 of the Civil Servants (Appointment, Promotion and Transfer) Rules, 1973.

14. Employment after retirement.- (1) A retired civil servant shall not be re-employed under the Federal Government, unless such re-employment is necessary in the public

12
interest and is made with the Prior approval of the authority next above the appointing authority:

Provided that, where the appointing authority is the President, such re-employment may be ordered with the approval of the President.

(2) Subject to the provisions of sub-section (1) of section 3 of the Ex-Government Servants (Employment with Foreign Governments) (Prohibition) Act, 1966 (XII of 1966), a civil servant may during leave preparatory to retirement, or after retirement from Government service, seek any private employment:

Provided that, where employment is sought by a civil servant while on leave preparatory to retirement or within two years of the date of his retirement, he shall obtain the prior approval of the prescribed authority.

15. Conduct.- The conduct of a civil servant shall be regulated by rules made, or instructions issued, by Government or a prescribed authority, whether generally or in respect of a specified group or class of civil servants.

16. Efficiency and discipline.- A civil servant shall be liable to prescribed disciplinary action and penalties in accordance with the prescribed procedure.

17. Pay.- A civil servant appointed to a post or grade shall be entitled, in accordance with the rules, to the pay sanctioned for such post or grade:

Provided that, when the appointment is made on a current-charge basis or by way of additional charge, his pay shall be fixed in the prescribed manner:

Provided further that where a civil servant has, under an order which is later set aside, been dismissed or removed from service or reduced in rank, he shall, on the setting aside of such order, be entitled to such arrears of pay as the authority setting aside such order may determine.

18. Leave.- A civil servant shall be allowed leave in accordance with the leave rules applicable to him, provided that the grant of leave will depend on the exigencies of service and be at the discretion of the competent authority.

19. Pension and gratuity.- (1) On retirement from service, a civil servant shall be entitled to receive such pension or gratuity as may be prescribed.

(2) In the event of death of the civil servant, whether before or after retirement, his family shall be entitled to receive such pension, or gratuity, or both, as may be prescribed.

(3) No pension shall be admissible to a civil servant who is dismissed or removed from service for reasons of discipline, but Government may sanction compassionate

allowance to such a civil servant, not exceeding two-thirds of the pension or gratuity which would have been admissible to him had he been invalided from service on the date of such dismissal or removal.

(4) If the determination of the amount of pension or gratuity admissible to a civil servant is delayed beyond one month of the date of his retirement or death, he or his family, as the case may be, shall be paid provisional such anticipatory pension or gratuity as may be determined by the prescribed authority, according to the length of service of the civil servant which qualifies for pension or gratuity; and any overpayment consequent on such provisional payment shall be adjusted against the amount of pension or gratuity finally determined as payable to such civil servant or his family.

20. Provident Fund.- (1) Before the expiry of the third month of every financial year, the accounts officer or other officer required to maintain provident fund accounts shall furnish to every civil servant subscribing to a provident fund the account of which he is required to maintain a statement under his hand showing the subscriptions to including the interest accruing thereon, if any, and withdrawals or advances from his provident fund during the preceding financial year.

(2) Where any subscription made by a civil servant to his provident fund has not been shown or credited in the account by the accounts or other officer required to maintain such account, such subscription shall be credited to the account of the civil servant on the basis of such evidence as may be prescribed.

21. Benevolent Fund and Group Insurance.- All civil servants and their families shall be entitled to the benefits admissible under the Central Employees Benevolent fund and group Insurance Act, 1969 (II of 1969), and the rules made there under.

22. Right of appeal or representation.- (1) Where a right to prefer an appeal or apply for review in respect of any order relating to the terms and conditions of his service is provided to a civil servant under any rules applicable to him, such appeal or application shall except as may be otherwise prescribed be made within thirty days of the date of such order.

(2) Where no provision for appeal or review exists under the rules in respect of any order or class of orders, a civil servant aggrieved by any such order may, within thirty days of the communication to him of such order, make a representation against it to the authority next above the authority which made the order:

Provided that no representation shall lie on matters relating to the determination of fitness of a person to hold a particular post or to be promoted to a higher post or grade.

CHAPTER III.- MISCELLANEOUS

23. Saving.- Nothing in this Act or in any rule shall be construed to limit or abridge the power of the President to deal with the case of any civil servant in such manner as may appear to him to be just and equitable:

Provided that, where this Act or any rule is applicable to the case of a civil servant, the case shall not be dealt with in any manner less favourable to him than that provided by this Act or such rule.

23A. Indemnity.- No suit, prosecution or other legal proceedings shall lie against a civil servant for anything done in his official capacity which is in good faith done or intended to be done under this Act or the rules, instructions or directions made or issued there under. 23B. Jurisdiction barred.- Save as provided under this Act and the Service Tribunals Act, 1973 (LDD of 1973), or the rules made there under, no order made or proceedings taken under this Act, or the rules made there under by the President or any officer authorized by him shall be called in question in any Court and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance of any power conferred by, or under, this Act or the rules made there under.

24. Removal of difficulties.- If any difficulty arises in giving effect to any of the provisions of this Act, the President may make such order, not inconsistent with the provisions of this Act, as may appear to him to be necessary for the purpose of removing the difficulty:

Provided that no such power shall be exercised after the expiry of one year from the coming into force of this Act.

CHAPTER IV.-RULES

25. Rules.- (1) The President or any person authorized by the President in this behalf, may make such rules as appear to him to be necessary or expedient for carrying out the purposes of this Act.

(2) Any rules, orders or instructions in respect of any terms and conditions of service of civil servants duly made or issued by an authority competent to make them and in force immediately before the commencement of this Act shall, in so far as such rules, orders or instructions are not inconsistent with the provisions of this Act, be deemed to be rules made under this Act.

26. Repeal.- The Civil Servants Ordinance, 1973 (XIV of 1973), is hereby repealed.

Source: http://www.jamilandjamil.com/publications/pub_labour_laws/act1973.htm

Accessed on 12 April 2010

**DIRECTORATE OF SOCIAL WELFARE, SPECIAL EDUCATION & WOMEN EMPOWERMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA, PESHAWAR**

[Provisional / Tentative Seniority List of Matriculate class-IV Employees

S#	Name	Father name	D.O.B	Domicile	Qualification	Date of initial Appointment with post	Date of Regular posting	Present posting	Remarks
1	Mr. Faiz Ur Rehman	Mr. Abdul Ghafoor	21-01-1965	Peshawar	Matric	18-10-1986 as N/Qasid	18-10-1986	SEC Peshawar	
2	Mr. Shaukat Hussain	Mr. Allah Ditta	16-04-1969	Abbottabad	BA	09-01-1988 as Naib Qasid	09-01-1988	SEC Abbottabad	
3	Mr. Fazle Maula	Mr. Sharif Ullah	30-12-1962	Peshawar	Matric	27-04-1988 As Chowkidar	27-04-1988	SEC Peshawar	
4	Mr. Muhammad Javid Hashmi	Mr. Ghulam Hashim	01-04-1970	D I Khan	Matric	08-05-1995 as Sweeper	08-05-1995	SEC D I Khan	
5	Mr. Muhammad Nawaz Khan	Mr. Rabnawaz Khan	22-05-1976	Mardan	MA	15-06-1996 as Chowkidar	15-06-1996	SEC Mardan	
6	Mr. Waheed Jan	Mr. Bahadar Shah	12-02-1978	Charsadda	FA	21-09-2000 as Attendant	21-09-2000	SEC Charsadda	
7	Mr. Muhammad Zafar	Haji Faiz Muhammad	20-06-1974	D I Khan	Matric	31-07-2001 as Chowkidar	31-07-2001	SEC D I Khan	
8	Mr. Irfan Ullah	Mr. Rafi Ullah	10-03-1985	Swabi	Matric	01-08-2005 as Attendant	01-08-2005	SEC Peshawar	
9	Mr. Hanif Khan	Mr. Allah Dad	12-12-1979	Abbottabad	Matric	01-08-2005 as Attendant	01-08-2005	SEC Abbottabad	
10	Mr. Muhammad Shafiq	Mr. Muhammad Maroof	11-04-1977	Abbottabad	Matric	01-08-2005 as Mali	01-08-2005	SEC Abbottabad	
11	Mr. Faiz Rabi	Mr. Mian Haider	22-02-1985	Swat	Matric	01-08-2005 as Mali	01-08-2005	SEC Swat	
12	Mr. Iftikhar Khan	Mr. Muhammad Aslam	18-12-1975	Charsadda	Matric	02-08-2005 as Attendant	02-08-2005	SEC Charsadda	
13	Mr. Muzaffar Shah	Mr. Mirza Khan	20-02-1981	Mardan	Matric	02-08-2005 as Chowkidar	02-08-2005	SEC Mardan	

Annex IV

14	Mr. Farhad	Mr. Mehar Shah	12-02-1983	Peshawar	Matric	02-08-2005 as N/Qasid	02-08-2005	VTCD Peshawar
15	Mr. Siraj Khan	Mr. Muslim Zada	15-01-1987	Mardan	Matric	10-08-2005 as Attendant	10-08-2005	SEC Mardan
16	Mr. Waqas Hussain	Mr. Ghulam Hussain	15-04-1988	Kohat	Matric	18-12-2008 as Attendant	18-12-2008	SEC Peshawar
17	Mr. Abbas Ali	Mr. Muhammad Idrees	02-04-1988	Swabi	FA	22-12-2008 as Sweeper	22-12-2008	SEC D I Khan
18	Mr. Zafar Hussain	Mr. Wahj Din	17-03-1985	Nowshera	Matric	01-01-2009 as Mali	01-01-2009	VTCDP Mardan
19	Mr. Inamullah	Mr. Poshad	02-01-1980	Mardan	Matric	10-02-2007 as N/Qasid	01-07-2010	ISDC Peshawar
20	Mr. Muhammad Ghafoor	Mr. Sardar Khan	20-08-1982	Karak	Matric	13-02-2007 as N/Qasid	01-07-2010	CDC Chakdara
21	Mr. Adnan	Mr. Muhammad Karim	22-09-1982	Charsadda	Matric	15-02-2007 as Chowkidar	01-07-2010	ISDC Peshawar
22	Mr. Muhammad Wisal	Mr. Sher Akbar	22-02-1987	Mardan	Matric	19-05-2007 as Attendant	01-07-2010	SEC Mardan
23	Mr. Akhtar Ali	Mr. Rahim Khan	25-02-1980	Mardan	Matric	19-05-2007 as Attendant	01-07-2010	VTCDP Mardan
24	Mr. Hazrat Ali	Mr. Faridullah	10-04-1988	Mardan	Matric	21-05-2007 as Hostel Bearer	01-07-2010	Hostel Peshawar
25	Mr. Zahir Ullah	Mr. Sher Alam Khan	10-03-1986	Chakdara	Matric	22-02-2007 as N/Qasid	01-07-2010	CDC Chakdara
26	Mr. Zahid Ali	Mr. Qamar Zaman	10-05-1983	Swabi	Matric	22-05-2007 as Attendant	01-07-2010	SEC Peshawar
27	Mr. Bilal	Mr. Shamsahd	01-06-1986	Mardan	Matric	22-05-2007 as Chowkidar	01-07-2010	VTCDP Mardan
28	Mr. Zafar Ali	Mr. Sarfraz Gul	15-01-1978	Mardan	Matric	22-05-2007 as Chowkidar	01-07-2010	SEC Peshawar
29	Mr. Ziaullah	Mr. Hayat Gul	21-03-1979	Mardan	Matric	23-05-2007 as N/Qasid	01-07-2010	SEC Charsadda
30	Mr. Misal Khan	Mr. Muharam Khan	01-04-1982	Mardan	FA	23-05-2007 as Attendant	01-07-2010	SEC Mardan
31	Mr. Nasir Parvez	Mr. Hayat Mir	06-03-1987	Kohat	Matric	23-05-2007 as Cook Helper	01-07-2010	Hostel Peshawar

32	Mr. Riaz Ahmad	Mr. Obaid Ullah Jan	31-10-1976	Charsadda	Matric	23-05-2007 as Sweeper	01-07-2010	SEC Charsadda	
33	Syed Imran Shah	Syed Mahir Shah	05-02-1984	Mardan	Matric	24-05-2007 as Attendant	01-07-2010	SEC Mardan	
34	Mr. Ibad Ullah	Mr. Mir Zaman	10-02-1986	Charsadda	BA	24-05-2007 as Chowkidar	01-07-2010	ISDC Peshawar	
35	Mr. Sajjad Ali	Mr. Amanullah	12-04-1980	Mardan	Matric	24-05-2007 as Attendant	01-07-2010	SEC Mardan	
36	Mr. Zahid Shah	Mr. Wazir Shah	01-02-1979	Mardan	Matric	24-05-2007 as Attendant	01-07-2010	SEC Mardan	
37	Mr. Haji Ahmad	Mr. Firdous Khan	18-08-1976	Mardan	Matric	24-05-2007 as Sweeper	01-07-2010	SEC Mardan	
38	Mr. Shah Jehan	Mr. Momin Khan	02-03-1981	Mardan	Matric	24-05-2007 as Mali	01-07-2010	SEC Mardan	
39	Mr. Saleem	Mr Hayat Gul.	01-09-1980	Charsadda	Matric	25-01-2010 as Sweeper	25-01-2010	SEC Charsadda	
40	Mr. Muhammad Ishaq	Mr. Sajjad Ali	01-03-1985	Mardan	Matric	25-05-2007 as Attendant	01-07-2010	SEC Mardan	
41	Mr. Abdul Wahab	Mr. Nawab Khan	15-01-1978	Charsadda	FA	25-05-2007 as Attendant	01-07-2010	VTCDP Peshawar	
42	Mr. Muhammad Abbas	Mr. Muhammad Amin	16-09-1983	Kohat	Matric	25-05-2007 as Chowkidar	01-07-2010	SEC Kohat	
43	Mr. Seyad Ali	Mr. Akbar Ali	10-02-1979	Swabi	Matric	25-05-2007 as Sweeper	01-07-2010	VTCDP Mardan	
44	Mr. Asad Ali	Mr. Muhammad Rasani	13-01-1988	Mardan	Matric	25-05-2007 as Hostel Bearer	01-07-2010	Hostel Peshawar	
45	Mr. Hameed Gul	Mr. Khan Mir	23-04-1978	Nowshera	Matric	25-05-2007 as Cook	01-07-2010	Hostel Peshawar	
46	Mr. Lai Bahdur	Mr. Taj Akbar	02-02-1985	Mardan	Matric	25-05-2007 as Mali	01-07-2010	SEC Peshawar	
47	Mr. Khan Zeb	Mr. Ghulam Hagani	11-02-1980	Mardan	Matric	26-05-2007 as Chowkidar	01-07-2010	SEC Peshawar	
48	Mr. Humair Anayat Malik	Mr. Anayat Ullah Malik	15-10-1986	Rawalpindi	Matric	28-05-2007 as Attendant	01-07-2010	DO (sw) Mansehra	
49	Mr. Muhammad Ikram	Mr. Abdul Tawab	08-00-1979	Swabi	Matric	30-06-2007 as Chowkidar	01-07-2010	SEC Peshawar	

50	Mr. Rehman Ali	Mr. Gul Ayub Khan	12-05-1979	Karak	Matric	01-08-2007 as Attendant	01-07-2010	SEC Kohat	
51	Mr. Naik Amat Khan	Mr. Rab Nawaz Khan	03-12-1978	Mardan	Matric	10-09-2007 as Attendant	01-07-2010	SEC Peshawar	
52	Mr. Asif Ullah	Mr. Farman Ullah	16-03-1989	Charsadda	BA	23-10-2007 as N/Qasid	01-07-2010	ISDC Peshawar	
53	Mr. Javed Ali	Mr. Ghani ur Rehman	13-02-1983	Swabi	BA	01-12-2007 as Cook	01-07-2010	Hostel Peshawar	
54	Mr. Askar Khan	Mr. Dawer Khan	02-03-1988	Mardan	FA	08-12-2007 as Attendant	01-07-2010	VTCDP Mardan	
55	Mr. Bashir	Mr. Qamar Din	14-03-1983	Mardan	FA	21-00-2007 as Chowkidar	01-07-2010	Darul Aman Mardan	
56	Mr. Bakht zaman	Mr. Gul Muhammad	02-02-1978	Dir Lower	Matric	04-04-2008 as N/Qasid	01-07-2010	SSMC Chakdara	
57	Mr. Syed Amir	Syed Fayyaz Ur Rehman	06-02-1984	Mardan	Matric	20-01-2010 as Attendant	01-07-2010	Hostel Mardan	
58	Mr. Ahmad Ali	Mr. Ghulam Jamat Khan	20-02-1990	Chitral	Matric	20-01-2010 as Attendant	20-01-2010	SEC Peshawar	
59	Mr. Shahid Hussain	Mr. Fazal Islam	16-03-1990	Swabi	Matric	15-01-2010 as Chowkidar	08-03-2012	Hostel Mardan	
60	Mr. Fazal Amin Khan	Mr. Muhammad Iqbal Khan	01-03-1989	Mardan	FA	16-01-2010 as Attendant	08-03-2012	Hostel Mardan	