

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
IT
Peshawar

24th May, 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, 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

8-8-2022 Due to the Public Holiday the case is adjourned to 30-9-2022

Reader

30.09.2022

Appellant present through counsel.

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

Request for adjournment was made on behalf of appellant in order to prepare the brief. Adjourned. To come up for arguments on 15.11.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

15th Nov. 2022

Counsel for the appellant present.

Mr. Naseerud 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.

R

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.

PN 113

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.



Chairman

27.9.21

*DB is on Tour case to come up
For the same on Dated. 24.1.22*

Rendex

SCANNED
KPST
Peshawar

Appellant Deposited
Security & Process Fee

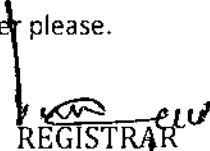

21/9/21

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4249 /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. Nawaz Khan 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. 4749 /2021

NAWAZ KHAN VS GOVT. OF KP & OTHERS

INDEX

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4.	Notification dated 31.08.2010	C	12-19
5.	application	D	20-23
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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. NAWAZ KHAN, Chowkidar,
District Officer Social Welfare, Mardan.

..... **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 Mardan.

..... **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 Chowkidar vide order dated 09-06-1996 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 is attached as annexure **A.**
2. That the appellant was medically examined and was declared medically fit for government job by the concerned Medical Officer.
 3. That appellant along with the performance of his official duties also improved his education qualification by acquiring MA (Islamiyat) Degree from University of Peshawar in the year 2011 as well as PST. Copy of Educational Testimonials are attached as annexure **B.**
 4. That with the commencement of the 18th Constitutional Amendment in the year 2010 the service of the appellant was placed at the disposal of Province of Khyber Pakhtunkhwa vide notification dated 31-08-2010 and as such the appellant was placed at serial no. 231 of the notification. Copy of the notification dated 31.08.2010 is attached as annexure **C.**
 5. That the appellant filed several application for his promotion to the post of Junior Clerk (BPS-11) being eligible in all respect which was corresponded among the respondent but finally the appellant was informed regarding the fate of his promotion vide letter dated 07-11-2018. Copy of application, correspondence & letter dated 07-11-2018 is attached as annexure **D, E & F.**
 6. 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.**
 7. 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.**
 8. 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 the requisite qualification along with 30 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


NAWAZ KHAN

THROUGH:


NOOR MOHAMMAD KHATTAK

&

MUHAMMAD MAAZ MADNI
ADVOCATES.

Islamabad, 9th June, 1996

MEMORANDUM

SUBJECT: APPOINTMENT FOR THE POST CHOWKIDAR (BPS-1) *Anyyav* **A**

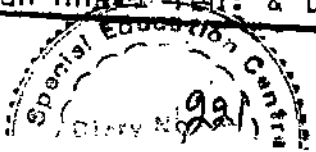
With reference to his/her application Mr./Miss/Mrs. Mr. Nawaz Khan is offered the post of Chowkidar in the Special Education Centre for Mentally Retarded Children, Mardan under the Directorate General of Special Education on the following terms and conditions:-

- i) He/She will be entitled to a pay in the Basic Pay Scale No. 1 viz Rs. 1245-35-1770 plus allowances as may be admissible under the rules.
- ii) The appointment is on a purely temporary basis and will be subject to his/her character and antecedents have been verified and she/he is medically found fit and submission of required Educational, Diploma and Experience Certificates etc. in accordance with above post covering age limit as framed for the post.
- iii) He/She will be on probation for a period of one year extendable by a further period not exceeding 12 months.
- 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 service under Government at any time; he/she shall resign in writing and shall thereafter continue to serve Government until his/her resignation is accepted. If he/she absents himself/herself from duty before acceptance of his/her resignation by Government he/she shall be liable to disciplinary action which may result in disqualification from further employment under Government.
- vi) He/She will have no claim or title to permanent retention/confirmation on any post, in this Directorate/Projects on basis of this appointment.
- vii) He/She may be posted/transferred at any Province/District as per requirement of services.

2. If the offer is acceptable to him/her on the above mentioned terms and conditions he/she should report for duty within 10 days of time and submit his/her acceptance to Vice Principal Special Education Centre for Mentally Retarded Children, 336/4, Bagh-e-Iram, Mardan.

Mr. Nawaz Khan S/o Rab Nawaz
P.O Khoi Bar, Mohallah Umer,
Khan Khait-Teh: & Distt. Mardan.

[Signature]
(ASHIQUE HUSSAIN SOOMRO)
DIRECTOR (ADMN & COORD)



Copy to:-

ATTACHED

9/6/96

Annxure "B" (5)

S. No/ 028

Roll No. 28

Ittehad Type and Short Hand College

ASAD MARKET, MALAKAND ROAD, MARDAN

CERTIFICATE

This is to certify that Mr. Muhammad Nawaz Khan S/o Rab Nawaz Khan

Resident of Mohallah Umar Khan Khel Kohi Barmol Mardan

has undergone ~~SHORT HAND~~ **TYPING** Training Course in this Institute under my supervision

From 8-7-95 To 7-11-1995

He took keen interest in his studies during the training period.

At the time of completion of his Course, his speed of **TYPING** was 30 (Thirty) WPM
and ~~SHORT HAND~~ was XXXXXXXXXX WPM.

Wishing him good luck & success in his future life.

Date of Issue: 11.11.1995


PRINCIPAL

"This Certificate is issued without alteration or erasure"

Composed By: Danish Computers, Mardan Ph. 61147

ATTACHED

UNIVERSITY OF PESHAWAR

(Pakistan)



PROVISIONAL CERTIFICATE

SESSION - 2003

Examination: - Annual/Supplementary

Certified that Mr./Miss Muhammad Nawaz Khan
Son / Daughter of Rob Nawaz Khan
and a student/Candidate of District Mardan
has passed the B.A.
Examination held in June - 2003
by securing 231 marks out of 550 and has been placed in Third Division
(The Examination was taken as a whole / in parts)

P

C

Serial No 059042

Registration No 92-P-14494

Roll No 98694

Result declared on 11-10-2003

DEPUTY CONTROLLER OF EXAMINATIONS,
UNIVERSITY OF PESHAWAR

162
20-1-04

ATTACHED

8

786

72967 PC

Roll No. 126415

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

PROVISIONAL CERTIFICATE
(INTERMEDIATE EXAMINATION)

Session 95 Annual/Supplementary

ARTS Group

THIS IS TO CERTIFY THAT Muhammad Nawaz Khan
Son/daughter of Rabimuz Khan
and a candidate of Mardan Dutt

Registered No. _____ has passed the INTERMEDIATE EXAMINATION of the
Board of Intermediate & Secondary Education, Peshawar held in May '95
as a Regular/Private candidate. He/She obtained 774 Marks out of 1000 and
has been placed in Grade (D) Representing Fair

The Examination was taken as a whole/in parts

Prepared by _____

Checked by _____

Date of Preparation _____

[Signature]
Asst. Secretary (Certificates)
Board of Intermediate and Secondary
Education Peshawar

ATTACHED

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
PROVISIONAL CERTIFICATE

SECONDARY SCHOOL CERTIFICATE EXAMINATION
 Session 19 92 Annual/Supplementary

THIS IS TO CERTIFY THAT Mohammed Nawaz Khan
 Son/Daughter of Mrs Nawaz Khan
 and a candidate of Madrassa Ahsanul Uloom

has passed the Secondary School Certificate Examination of the
 Board of Intermediate & Secondary Education Peshawar held in Dec 1992 as a
 Regular/Private candidate. He/She obtained 438 Marks out of 850 and has been placed in
 Grade (C) Representing gus-a

The candidate passed in the following subjects

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Pak. Studies
- 5. G. Maths/Maths (Ele.)
- 6. CS
- 7. IS
- 8. PA

Internal assessment Grade awarded by the institution concerned is (2-1)

Date of Birth according to admission form is Twenty Second March

One thousand nine hundred and Seventy Six (22-3-76)

Prepared by
 Checked by
 Date of Preparation

Asstt. Secretary (Certificates)
 Asstt. Secretary (Certificates) & Co.
 Education

ATTACHED

Al-Lama Aqbal Open University
Islamabad

10



Serial No. 267516

Certified that *Mr/Ms* MUHAMMAD NAWAZ KHAN
Son/Daughter of RAB NAWAZ KHAN
Registration No 07NMN4793 *Roll No* 607007177
Semester SPRING 2008 *having met all the requirements under*
the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured 68 % *marks*
and has been placed in B *grade*



Result declared on: **March 14, 2009**

Date of issue: **April 30, 2018**

LM

Mamun
Controller of Examinations

②

J

Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

MAMUN

11

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
613	PRINCIPLES OF EDUCATION	61
614	EDUCATIONAL PSYCHOLOGY	56
615	SCHOOL ORGANIZATION & MANAGEMENT	73
616	SCHOOL COMMUNITY & PRACTICAL ARTS	66
617	TEACHING OF URDU	66
618	TEACHING OF MATHEMATICS	66
619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	58
620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	71
611	PRACTICAL WORKSHOP & TEACHING PRACTICE	94

[Handwritten signature]

Total credit hours **XXX**
 Total credits AIU **5**
 First semester: **AUTUMN 2007**

Obtained / Total marks **611 / 900**
 Cumulative grade point average **XXX**
 Final semester **SPRING 2008**

Grading Scheme	
80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail

[Handwritten signature]

Controller of Examinations



Dated Feshwar the 31/10/2019

NOTIFICATION

No. DI/Absorption/Dev-Emol/OSW/ 3331-610 In pursuance of Section II-B of the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII 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 114 of 2000

S.#	Name	Designation	BPS
1	Mr. Nasir Khan Lodhi	Admin Officer	15
2	Mr. Muhammad Rauf	- do -	16
3	Mr. Daud Khan	S/S Stenographer	16
4	Mr. Noor Wahid	Office Assistant	16
5	Mr. Rehana Ullah	- do -	16
6	Mr. Hilayat 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. Mulsin Ali	Computer Operator	16
15	Mr. Tehmasab Khalid	- do -	16
16	Mr. Wajid Maqsood	- do -	16
17	Mr. Javed 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. Rameez Khan	1-Scale Stenographer	17
23	Mr. Sardar Ullah Shah	- do -	17
24	Mr. Hayat Zafar	- do -	17
25	Mr. Fazal Wahab	- do -	17
26	Mr. Asif Iqbal	- do -	17
27	Mr. Naimat Ullah	- do -	17
28	Mr. Fazal Rehman	- do -	17

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13

30	Mr. Ahmad Ali	- do -	14
31	Mr. Salah Ud Din	- do -	14
32	Mr. Muhammad Faizan	- do -	14
33	Mr. Khafid 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. Zawat Ali	- do -	14
42	Mr. Sher Azim	- do -	14
43	Mr. Saif Alam	Junior Clerk	11
44	Mr. Furqan Jamal	- do -	11
45	Mr. Haroon Rashid	- do -	11
46	Mr. Imran Khan	- do -	11
47	Mr. Muhammad Ayaz	- do -	11
48	Mr. Saad Ud Din	- do -	11
49	Mr. M. Saeed Khan	- do -	11
50	Mr. Inam 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	Language Instructor	15
55	Mr. Anjad 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. Rafiqat Nubi	- do -	15
61	Mr. Zulfiqar Waqar	- do -	15
62	Mr. Muhammad Younas	- do -	15
63	Mr. Rizwan Qayum	- do -	15
64	Mrs. Anam Mashiq	Vocational Instructor	15
65	Mrs. Anwar Sabih	- do -	15
66	Mrs. Shagufta Naseem	- do -	15
67	Mrs. Shabana Tabassum	- do -	15
68	Mrs. Nabeen 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

ATTACHED

73	Mrs. Nazia Parveen	- do -	12
74	Mrs. Sabra Gul	- do -	12
75	Mrs. Robreena Mughal	- do -	12
76	Mr. Amjad Hussain	- do -	12
77	Mr. Qamar Nazir	- do -	12
78	Mrs. Amratiz Begum	- do -	12
79	Mrs. Yasmin	- do -	12
80	Mrs. Fehmehala Syed	- do -	12
81	Mrs. Shaheen Begum	- do -	12
82	Mrs. Fakhri	- do -	12
83	Ms. Faizal Afridi	- do -	12
84	Ms. Waheeda Gul	- do -	12
85	Mrs. Nazhat Rahman	- do -	12
86	Mr. Wali Marjan	Wash Shop Technician	12
87	Mr. Asif Khan	- do -	12
88	Mrs. Riffat Jabeen	- do -	12
89	Mr. Irfan Ullah	Head Teacher	12
90	Mr. Abdul Hai	- do -	12
91	Mr. Habib Ullah	- do -	12
92	Mr. Muhammad Ishaq	- do -	12
93	Mrs. Uzma Naveen	- do -	12
94	Mr. Asif Mehmood	- do -	12
95	Mr. Tanzeed Ali Raza	- do -	12
96	Mrs. Zarbeena	- do -	12
97	Mr. Tajamul Hussain	- do -	12
98	Mr. Rafi Ullah	Qari	10
99	Mr. Masood Jan	PTI	08
100	Mr. Muhammad Nouman	- do -	16
101	Mrs. Feroza Bibi	Voc Training Instructor	08
102	Mr. Zahid Ali	- do -	08
103	Mr. Sultan Wali Khan	- do -	08
104	Mrs. Nasima Zulfikar Ali	- do -	08
105	Mrs. Shazia Bibi	- do -	08
106	Mrs. Sumayya	- do -	08
107	Mr. Alamgir Khan	- do -	08
108	Mrs. Nasira Bibi	LIN	09
109	Mrs. Naveen	- do -	09
110	Mrs. Bibi Rana	- 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 Zaki Khan	Recreation Youth Worker	07
115	Mr. Sharif Khan	- do -	07
116	Mr. Mir Afzal Khan	- do -	07

ATTESTED

117	Mrs. Hameeda Bibi	- do -	07
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. Ameer 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. Hamayun Ullah	- do -	07
132	Mr. Muhammad Sultan	- do -	07
133	Mr. Muhammad Raouzan	- do -	07
134	Mr. Rehman Ullah	- do -	07
135	Mr. Aamir Abbas	- do -	07
136	Mr. Sikandar Khan	- do -	07
137	Mr. Khalid	- do -	07
138	Mr. Ahmad Bilal	- do -	07
139	Mr. Maqsood Ahmad Daig	- do -	07
140	Mr. Karim Parah	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. Shahbir Ali	- do -	05
147	Mr. Asfandiar	- do -	05
148	Mr. Shah Jehan	- do -	05
149	Mr. Naik Amal Khan	- do -	05
150	Mr. Shair Nawaz	- do -	05
151	Mr. Irfanullah	- do -	05
152	Mr. Zahid Ali	- do -	05
153	Mr. Farhan Ali	- do -	05
154	Mr. Asad Mehmoed	- do -	05
155	Mr. Jangal Khan	- do -	05
156	Mr. Siraj Ahmad	- do -	05
157	Mr. Malik Riaz	- do -	05
158	Mr. Shakir Ullah	- do -	05
159	Muhammad Saqeer	- do -	05
160	Mr. Abdul Wahab	- do -	05

ATTENDED

16

161	Mr. Jekar 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 Cui	- do -	05
175	Mr. Hukmar 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. Huzrat Bilal	- do -	05
181	Mr. Nawab Zahir	- do -	05
182	Mr. Rahman Ali	- do -	05
183	Mr. Fazal Anon	- do -	05
184	Mr. Humair Inayat Malik	- do -	05
185	Mst. Mukhijiroon Bibi	Ayn	05
186	Mrs. Tahira Naqvi	- do -	05
187	Mrs. Aera Bulhari	- do -	05
188	Mrs. Dilfat Begum	- do -	05
189	Mrs. Shagitta	- do -	05
190	Mrs. Jameela Khatun	- do -	05
191	Mrs. Ambareen Ismail	- do -	05
192	Mrs. Rehana Bibi	- do -	05
193	Mst. Naheeda Bibi	- do -	05
194	Mr. Sohail Ahmad	Nach Qasid	04
195	Mr. Saifur Ali	- do -	04
196	Mr. Faiz-Ur-Rufman	- 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. Inamullah	- do -	04
202	Mr. Muhammad Ghaffoor	- do -	04
203	Mr. Mukhtar Shah	- do -	04
204	Mr. Amjad Hussain	- do -	04

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17

205	Mr. Zia Ullah	- do -	04
206	Mr. Bakht Zamin	- do -	04
207	Mr. Mir Shah Jehan	- do -	04
208	Mr. Muhammad Shakeel	- do -	04
209	Mr. Tahir	- do -	04
210	Mr. Shaikat Hussain	- do -	04
211	Mr. Najam Khan	- do -	04
212	Mr. Zahir Ullah	- do -	04
213	Mr. Bakht Zamin	- do -	04
214	Mr. Shakri Muhammad	- do -	04
215	Mr. Khush Qudus	- do -	04
216	Mr. Fazle Maufa	Chowkilar	04
217	Mr. Muhammad Ikram	- do -	04
218	Mr. Khan Zaid	- do -	04
219	Mr. Zafar Ali	- do -	04
220	Mr. Saad Azam	- do -	04
221	Mr. Nizam Wali	- do -	04
222	Mr. Bashir	- do -	04
223	Mr. Ibad Ullah	- do -	04
224	Mr. Aftab	- do -	04
225	Mr. Muhammad Bilal	- do -	04
226	Mr. Mazhar Sindh	- do -	04
227	Mr. Sajid Ahmad	- do -	04
228	Mr. Muhammad Hafeez	- do -	04
229	Mr. Ikram Ali	- do -	04
230	Mr. Shabid Hussain	- do -	04
231	Mr. Muhammad Nawaz	- do -	04
232	Mr. Saad 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. Tausi Mohammad	- do -	04
240	Mr. Muhammad Azam	- do -	04
241	Mr. Farid Ullah Jan	- do -	04
242	Mr. Murad Ullah	Bohli	04
243	Mr. Akbar Ali	- do -	04
244	Mr. Munzir Gul	- do -	04
245	Mr. Tal Bahadar	- do -	04
246	Mr. Faizan Akhtar	- do -	04
247	Mr. Subhat Khan	- do -	04
248	Mr. Gul Muhammad	- do -	04

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18

249	Mr. Shah Jehan	- do -	04
250	Mr. Imran Ali	- do -	04
251	Mr. Zafar Hussain	- do -	04
252	Mr. Muhammad Shafiq	- do -	04
253	Mr. Fazal Rabi	- do -	04
254	Mr. Shah Nawaz	Sanitary Worker	04
255	Mr. Javed Iqbal	- do -	04
256	Mr. Riaz Ahmad	- do -	04
257	Mr. Iqbal 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 -	05
262	Mr. Daniyal Masih	- do -	04
263	Ms. Maryam Saffin	- do -	04
264	Mrs. Nabeed Begum	- do -	04
265	Mr. Siddique Ali	- do -	04
266	Mr. Amjad Ali	- do -	04
267	Mr. Rahid Ali	- do -	04
268	Mr. Muhammad Ishaq	- do -	04
269	Mr. Iqbal Hussain	- do -	04
270	Mr. Haji Aamul	- do -	04
271	Mr. Arshad Ali	- do -	04
272	Mr. Raza Muhammad	- do -	04
273	Mr. Suhail	- do -	04
274	Mr. Syad Ali	- do -	04
275	Mr. Saleem Khan	- do -	04
276	Mr. Kurrain Khan	- do -	04
277	Mr. Abid Jan	- do -	04
278	Mr. Abbas Ali	- do -	04
279	Mr. Javed Hashim	- do -	04
280	Mr. Fazal Khalid	- do -	04
281	Mr. Tariq Masih	- do -	04
282	Mst. Hasina Bibi	Dom / Midwife	04
283	Mst. Shaukat Nisa	- do -	04
284	Mr. Hameed Gul	Cook	05
285	Mr. Javed Ali	- do -	04
286	Syed Fawad Ali	- do -	04
287	Mr. Naeem Pervaiz	Cook / Helper	04
288	Mr. Hafiz Dr. Ruhman	Hostel Dealer	05
289	Mr. Hazrat Ali	- do -	05
290	Mr. Asad Ali	- do -	05
291	Mr. Waqem Arshad	- do -	05

[Handwritten signature]

19

Sd-
DIRECTOR

Social welfare, Special Education &
Women Empowerment Department
Khyber Pakhtunkhwa

Encls. 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. *SEC Pesh*
9. PA to Director Social Welfare, SE & WE Khyber Pakhtunkhwa.

Fateh Jilani
DEPUTY DIRECTOR
(ISDC)

Social welfare, Special Education &
Women Empowerment Department
Khyber Pakhtunkhwa

[Signature]

گورنمنٹ جنرل ڈاکٹر بلوچ صاحب سوشل ویلفیئر اینڈ سوشل ایجوکیشن خیر فنڈ قزاقوہ (پ) اور
(دوسرا دست درائے ڈیٹا انٹرنیشنل بیورویشن)

حصہ ۱۱

موجودہ ادارہ پزیرا لائسنس کی حالت ہے کہ فدوی آب مہمان کے زیر سایہ سوشل ایجوکیشن خیر فنڈ قزاقوہ
مراٹھ میں ٹھیکت نامہ خاصہ ڈھوٹی سرگاما کے رہا ہے۔ فدوی آب مہمان کی صورت میں ایک
فدوی مانت لائے گا صورت کر رہا ہے۔

۱۵ جون ۱۹۹۶ء میں ٹھیکت کو اس فور ڈھوٹی سوشل ایجوکیشن خیر فنڈ میں اٹھا دیا گیا ہے۔
جب فدوی مہمان ہوا تو فدوی کا نام اس وقت (۱۹ سال) تھا۔ فدوی نے اپنی حوالہ کیجیے کہ
مستحق ۲۲ سال سوشل ایجوکیشن میں ٹھیکت کو اس فور ڈھوٹی تکلیف سے لڑائی اور گزار دیا ہے۔
فدوی نے ۲۲ سال سرور میں میں یہ قسم لیا کہ وہ اس وقت کی لائے جارہے ہیں۔
اضراں نے ٹھیکت کے جانے کے بعد حوالہ اور نہ ہی موقع دیا۔

۱۵ جون ۱۹۹۶ء میں سوشل ایجوکیشن میں حوالہ ہوا تو اس وقت ہم سب فلاحی ادارہ میں تھے۔
۲۰۱۱ء میں ہماری قلم ڈیپوٹیشن سے ٹھیکت سے قلم میں سوشل ویلفیئر اینڈ سوشل
تربیت خیر فنڈ قزاقوہ کو حوالہ دینے تقریباً ۱۰ سال بعد ہم سب کا سوشل ایجوکیشن خیر فنڈ قزاقوہ
میں وزیر اعلیٰ ہونے کے بعد ہم سب حکم سوشل ویلفیئر اینڈ سوشل ایجوکیشن خیر فنڈ قزاقوہ کو لے کر
دو تھے ۷ سال ڈیپوٹیشن دور میں ہم سب علاؤ الدین نے قسم قرقر سے شروع ہوئے
علاؤ الدین اور فدوی کو اس فور علاؤ الدین میں سے ایک کو الیگنڈر بندہ ہے اور فدوی انہی ۱۱۰۰۰۰ روپے
سالہ رقم لے کر گھومتا ہے۔ فدوی کا تعلیمی مصیبت مڈل کلاس ہے۔

- ① مہر کی (۱۹۹۲) ② الف ایس (۱۹۹۵) ③ ای ایس (۲۰۰۳)
- ④ ایس ایس (۲۰۰۹) ⑤ بی ایچ ایس کورس (۲۰۰۹) ⑥ ایگنسٹ ایس کورس (۱۹۹۶)

۱۱ جون ۱۹۹۶ء فدوی ایک فریب اور لاہار بندہ ہے۔ فدوی اپنی عمر میں ہی فریب سے دنیا کے کم سے کم
لوگوں سے بچے رہتا ہے۔ فدوی کے آب مہمان سے بہت زیادہ آمدنی ہے۔
(P. 2)

ATTACHED

اور انشاء اللہ آپ صاحبان فدوی کو ڈیپارٹمنٹل پروموشن دیا جائے گا۔
 پروموشن فدوی کا حق ہے اور جب فدوی کو ڈیپارٹمنٹل پروموشن
 مل جائے تو دنیا کی خوشیوں میں ہم فدوی کا کہہ سکتے ہیں خوشی ہوگی
 اور یہ خوشی صرف آپ کے لئے نہیں بلکہ میرے خاندان کے گھڑ پڑی خوشی ہوگی
 اور انشاء اللہ یہ پڑی خوشی اللہ تعالیٰ کی طرف سے آپ صاحبان
 کے ہاتھوں سے ہوگی۔

آپ صاحبان کے طرف سے میں ایک دفعہ جمعہ عظیم ان دنوں انیسویں کی صبح
 کو فدوی ایک فریڈ شٹاؤن، چٹاؤن، دیپانٹ وار اور غورب 2018
 لکھی تھی اور اسے خاندان سے تعلق رکھتا ہے۔
 آپ صاحبان فدوی کی فریڈ اور غورب کو زیر غور رکھ کر فدوی کو
 ڈیپارٹمنٹل پروموشن دیکر فدوی کو اپنی قوم اور مسزورتوں
 کی خدمت کا موقع دے کہ مشکل فرمائیں
 فدوی ساری شکر و ثنا اور رفعت ہے۔

مورخہ 2018-12-10

السلامتہ

آپ صاحبان کا تقدر و قدر روز خان فاضل قاسم
 پروفیسر ٹیچنگ سٹوڈنٹس کنسلر اور مسزورتوں کے سربراہ
 شیخ ملتان سٹائن مراد
 موب نمبر 03465652373



To,
The Deputy Director,
Special Education Complex,
Mardan.

(Through proper channel)

Subject:- **APPEAL**

It is requested to your honour that I am working since 15-06-1996 as Chowkidar at SEC MRC, Mardan. The Directorate General of Special Education has advertised certain posts of LDC for which I applied with full confidence as I am graduate and knows short hand and typing and also having Primary Teaching Certificate from Allama Iqbal Open University, Islamabad. I was also nominated for the departmental promotion but in vain. In the present situations I have no political backing and I don't ever want to be upgraded in this way.

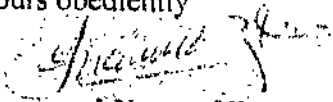
It is requested to your goodself to look personally into my matter and adjust me anywhere in Pakistan as LDC/UDC.

I would be personally grateful and obliged and will pray for your prosperous life.

I would be anxiously waiting for a reply in this connection.

Thanking you.

Yours obediently

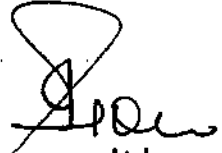
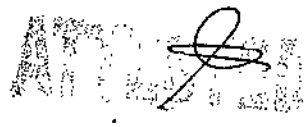


Mohammad Nawaz Khan
Chowkidar
SEC MRC, Mardan

Dated:-11-02-2010

Recommended & Forwarded for favourable consideration.

DA(NR)
DCSE.


11/2/2010
SYED SIKANDAR JALAL QASI
Deputy Director/ Vice Princip
GOVT. OF PAKISTAN
Special Education Comple:
MARDAN

The Deputy Director,
Special Education Center for
Mentally Retarded Children,
Special Education Complex,
Mardan

SUBJECT:- APPEAL AGAINST APPOINTMENT OF LDC ON NWFP QUOTA

Sir,

It is brought to your kind notice that I am working as Chowkidar (B-02) at the Special Education Center for Mentally Retarded Children, Special Education Complex, Mardan since 15-061-996 and I am performing my duties up to the level best and to the entire satisfaction of my seniors.

I am a graduate and have done my graduation in the year 2003. Being an eligible candidate, I always applied for any post advertised by the DGSE and all other Ministries and departments. My name was so many times recommended for departmental promotion/selection/ upgradation committee, but it is my fate that I have not got a chance.

Just recently the DGSE has advertised various posts in which I applied for the post of LDC on NWFP quota. I have given my typing test and interview and both of these were in my opinion of a very high standard and I was dead sure that this time I will get thought, but again to my misfortune I was not considered. I kept quite and thought that there may be another candidate of high standard, but when the candidate came and joined as LDC in the Special Education Center for Mentally Retarded Children, Special Education Complex, Mardan he was from Punjab as it was clearly advertised in the daily Express, Peshawar dated 11-09-2009 (advertisement copy enclosed) that the post of LDC at SECMRC, Mardan is for the NWFP quota. Now Mr. Furqan Jamil is appointed as LDC at the SECMRC, Mardan and he is from Tehsil Gujar Khan, District Rawalpindi (Punjab) and not from NWFP. So, I was shattered once again and it seems injustice to me that why for a seat of NWFP quota a candidate of other province is appointed.

It is requested and appealed with high expectations that my appeal would be considered on humanitarian grounds and justice would be done.

I would be anxiously waiting for a fruitful reply in this connection.

Thanking you.

Dated: 19th March, 2010.

Yours obediently,

(Signature)
O/c
(Mohammad Nawaz Khan)
Chowkidar (B-02)
SECMRC, Mardan

Advance copy for information and request to:

- i) PS to Secretary, M/O SW & SE, Islamabad
- ii) PS to DG (SE), DGSE, Islamabad
- iii) Director (A&C), DGSE, Islamabad

(Signature)
ATTORNEY

Anxxiii E (24)

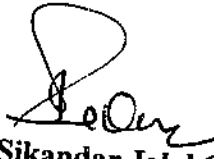
No.F.2-38/2003-SECMRC-MDN, 1/1/11
Government of Pakistan,
Ministry of Social Welfare and Special Education
(Directorate General of Special Education)
Special Education Centre for Mentally Retarded Children
Special Education Complex, Sector 'M', Phase-II, Sheikh Maltoon Town,

Mardan, the 19th March, 2010.

SUBJECT:- APPEAL AGAINST APPOINTMENT OF LDC ON NWFP QUOTA

Please find enclosed a self-explanatory appeal dated 19th March, 2010 submitted by Mr. Mohammad Nawaz Khan, Chowkidar (B-02), SECMRC, Mardan for favourable action and recommendations as per existing rules and regulations at DGSE, Islamabad.

2. Submitted for early action, please.

o/c 
(Sayid Sikandar Jalal Qasim)
Deputy Director

Deputy Director (NR),
Directorate General of Special Education,
Islamabad


ATTESTED

Annexure F

(2/S)



Government of Khyber Pakhtunkhwa
Directorate of Social Welfare, Special Education &
Women Empowerment Jamrud Road,

No. DI / 80 / DSW/ 2232-34
Dated Peshawar the 17/11/2018

To

✓ Mr. Muhammad Nawaz Khan,
Chowkidar, Special Education Complex,
Through District Officer Social Welfare,
Mardan.

Subject: APPLICATION / REQUEST FOR PROMOTION.

I am directed to refer to your application on the subject noted above forwarded by the Section Officer-VI Social Welfare vide his office letter No.SO-VI/SWD/1-2/Mise/2017-18/ KC/ 704 dated 12-10-2018 and to state that Guidelines for determination of Seniority has already been sought from the Administration Department which probably is still in progress. Your promotion case has been entered under the Seniority list of Matriculate class-VI employees and further necessary action will be taken in due course of time.

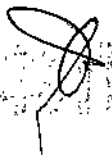

ASSISTANT DIRECTOR
Estab - I

Copy for information to:

1. The Section Officer-VI, SW, SE & WE Department w/r to his letter as mentioned above.
2. PA to Director Social Welfare, SE & WE Khyber Pakhtunkhwa.

ASSISTANT DIRECTOR
Estab - I

Seen
H.C.
08/11/2018


ATTACHED



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

26

Dated Peshawar the 30-07-2020

ORDER

No. E-17/56/No-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. Taqveem 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. Shakirullah	DO (SW) Office Peshawar
2	Mr. Mujeebullah	DO (SW) Office DIKhan
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 DIKhan
7	Mr. Ifkhar Ahmad	DO (SW) Office Charsadda
8	Mr. Hidayatullah	DO (SW) Office Malakand
9	Mr. KifayatUllah	DO (SW) Office DIKhan
10	Mr. Akbar Nawaz	DO (SW) Office Peshawar
11	Mr. Mansoor Ahmad	DO (SW) Office Mardan
12	Mr. Asad Khan	DO (SW) Office Mardan
13	Mr. Faiz 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

ATTACHED

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.

Posting of Senior Clerks (BPS-14)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Akbar Aji, 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. Iftikhar 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,	District Office SW Abbottabad

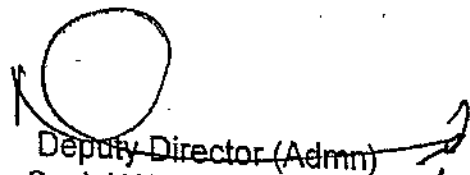
ATTACHED

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

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 (Admn)
 Social Welfare, SE & WE 30/7/22
 Khyber Pakhtunkhwa



To

The Director,
Social welfare Deptt.
Peshawar.

(29)

Subject: Appeal for promotion
to the post of Junior Clerk

Sir,

Respectfully it is stated that I am working as chowkidar under your control. I have passed M.A. Islamiyat and have also passed CT, PTC and other education. I have served sufficient time but I am not promoted to next higher grade.

Therefore, I may be promoted to the next higher grade of junior clerk. I shall be very thankful to you.

15-12-2020

Yours obediently
M. Nawaz Khan
Chowkidar

M. Nawaz Khan

ATTACHED

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

_____ OF 2021

Nawaz Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt of K.P & other

(RESPONDENT)
(DEFENDANT)

I/We Nawaz Khan

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

Mohammad Nawaz Khan
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 KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service appeal No. 4749/2021

**MR. Nawaz Khan, Chowkidar, District Office, Social Welfare Mardan
..... PPELLANT**

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, Mardan.....**Respondents**

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

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. The appellant has got no cause of action
2. The appeal is based on malafide intentions.
3. The appellant has no locus standi.
4. The appeal in hand has badly been time barred.
5. The appellant has not come to this Honorable Tribunal with clean hands.
6. The appellant has concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
7. The appeal is liable to be dismissed for non joinder / misjoinder of necessary parties.
8. 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/3331-40 dated 31.01.2018 (**Annex-I**).
2. Pertains to record.
3. Pertains to record.
4. Pertains to record.

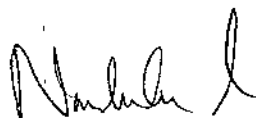
5. Correct to the extent that the appellant filed appeals for promotion but could not be materialized due to the facts mentioned in Para-6 below.
6. Correct to the extent that the Department has issued promotion order dated 30.07.2020. It is to clarify that the appellant was an employee of the devolved 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-II**). 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. 05 and on framing the requisite service rules, he will be promoted on his own turn (**Annex-III**).
7. 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.
8. Incorrect, hence denied. The appellant has no cause of action to file the instant appeal in the absence of proper service rules.

GROUND

- 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 have 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 1996 on regular basis and till filing of this service appeal, his total length of service counts 26 years approximately.

- 4.
- 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.

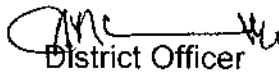
In view of the above mentioned factual position, it is humbly prayed that the service appeal being devoid of any merit, may graciously be dismissed with cost please.



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
Mardan
(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. XV 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. Hidayat 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. Muhammad Asghar	- 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. Zawat 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. Sharzida Parveen	- do -	12
71	Mr. Muhammad Siddique	do	12
72	Mr. Waqid Ali	do	12

6

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73 Mrs. Nazia Farveem 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. Fehmooda Syed	- do -	12
81	Mrs. Shaheen 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. Wali 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 Zulfqar 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

712433

118	Mr. Muhtaar Khan	- do -	07
119	Mr. Bakht Amir Shah	Driver	07
120	Mr. Aslam Perwaiz	- do -	07
121	Mr. Sher Umor	- do -	07
122	Mr. Muhammad Riaz	- do -	07
123	Mr. Ameer 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. Rehman 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 Amal 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 Sateer do 05

160 Abdul Wahab do 05

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. Iftikhar 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. Rahruan 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. Shagufta	- do -	05
190	Mrs. Jameela Khatun	- do -	05
191	Mrs. Ambarcen Ismail	- do -	05
192	Mrs. Rehana 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. Inamullah do 04
 202 Mr. Muhammad Ghaffar do 04
 203 Mr. Mukhtar Shah do 04
 204 Mr. Amjad Hussain do 04

9/12/11
35

206	Mr. Bakht Zamin	do	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. Fazle Maula	Chowkidar	04
217	Mr. Muhammad Ikram	- do -	04
218	Mr. Khen 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 Hafeez	- 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. Tauti Muhammad	- do -	04
240	Mr. Muhammad Azam	- do -	04
241	Mr. Farid Ullah Jan	- do -	04
242	Mr. Murad Ullah	Mali	04
243	Mr. Akbar Ali	- do -	04
244	Mr. Musafir Gul	- do -	04
245	Mr. Lal Bahadar	- do -	04
246	Mr. Faizan Akhtar	do	04

246 Mr. Faizan Akhtar do 04
247 Mr. Suhbat Khan do 04
248 Mr. Gul Muhammad do 04

249	Mr. Shah Jehan	do	04
250	Mr. Imran Ali	- do -	04
251	Mr. Zafar Hussain	- do -	04
252	Mr. Muhammad Shafiq	- do -	04
253	Mr. Fazal Rabi	- do -	04
254	Mr. Shah Nawaz	Sanitary Worker	04
255	Mr. Javed Iqbal	- do -	04
256	Mr. Riaz 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. Naheed Begum	- do -	04
265	Mr. Siddique 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 Hashim	- do -	04
280	Mr. Fazal Khaliq	- do -	04
281	Mr. Tariq Masih	- do -	04
282	Mst. Hasina Bibi	Dai / 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


(11) 126
37

(12) 127
38
82

-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

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 nay 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 adhoc shall be liable to termination on fourteen days' notice or pay in lieu thereof.

"11A. 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 adhoc, 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 form 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

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

(21)

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 Chafoor	21-01-1965	Peshawar	Matric	18-10-1986 as M/Qasid	18-10-1986	SEC	10
2	Mr. Shaukat Hussain	Mr. Allah Ditta	16-04-1969	Abbotabad	BA	09-01-1988 as Naib Qasid	09-01-1988	Peshawar SEC	
3	Mr. Fazle Maula	Mr. Sharif Ullah	30-12-1962	Peshawar	Matric	27-04-1988 As Chowkidar	27-04-1988	Abbotabad SEC	
4	Mr. Muhammad Javid Hashim	Mr. Ghulam Hashim	01-04-1970	D I Khan	Matric	08-05-1995 as Sweeper	08-05-1995	Peshawar SEC	
5	Mr. Muhammad Navez Khan	Mr. Rabnawaz Khan	22-03-1976	Mardan	MA	15-06-1996 as Chowkidar	15-06-1996	D I Khan SEC	
6	Mr. Wahced Jan	Mr. Bahadar Shah	12-02-1978	Charsadda	F/A	21-09-2000 as Attendant	21-09-2000	Mardan SEC	
7	Mr. Muhammad Zafar	Haji Faiz Muhammad	20-06-1974	D I Khan	Matric	31-07-2001 as Chowkidar	31-07-2001	Charsadda SEC	
8	Mr. Irfan Ullah	Mr. Rafi Ullah	10-03-1985	Swabi	Matric	01-08-2005 as Attendant	01-08-2005	D I Khan SEC	
9	Mr. Hanif Khan	Mr. Allah Dard	12-12-1979	Abbotabad	Matric	01-08-2005 as Attendant	01-08-2005	Peshawar SEC	
10	Mr. Muhammad Shafiq	Mr. Muhammad Maroof	11-04-1977	Abbotabad	Matric	01-08-2005 as Attendant	01-08-2005	Abbotabad SEC	
11	Mr. Fazli Rabi	Mr. Afiaz Haider	22-02-1985	Swat	Matric	01-08-2005 as Naib	01-08-2005	Abbotabad SEC	
12	Mr. Hukbar Khan	Mr. Muhammad Aslam	18-12-1975	Charsadda	Matric	07-08-2005 as Attendant	07-08-2005	Swat SEC	
13	Mr. Anwarul Haq	Mr. Anwar Khan	00-01-1981	Mardan	Matric	07-08-2005 as Attendant	07-08-2005	Charsadda SEC	

Annex III

(22)

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. Wahi Din	17-03-1985	Nowshera	Matric	01-01-2009 as Mali	01-01-2009	VTCDP Mardan
19	Mr. Inamullah	Mr. Postad	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 Waisal	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. Shamsud	01-06-1986	Mardan	Matric	22-05-2007 as Chowkidar	01-07-2010	VTCDP Mardan
28	Mr. Zafar Ali	Mr. Sarfaraz Gul	15-01-1978	Mardan	Matric	22-05-2007 as Chowkidar	01-07-2010	SEC Peshawar
29	Mr. Ziaullah	Mr. Jagan (tal	21-03-1979	Mardan	Matric	22-05-2007 as N/Qasid	01-07-2010	SEC Chakdara
30	Mr. Misal Khan	Mr. Mubtaman Khan	01-01-1982	Mardan	FA	22-05-2007 as Attendant	01-07-2010	SEC Mardan
31	Mr. Nasir Parvez	Mr. Hayat Mir	06-01-1987	Kohat	Matric	22-05-2007 as Hostel Bearer	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. Syed 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 Rasool	13-01-1988	Mardan	Matric	25-05-2007 as Hotel Keeper	01-07-2010	Hostel Mardan
45	Mr. Hameed Gul	Mr. Khan Mir	23-01-1978	Nowshera	Matric	25-05-2007 as Cook	01-07-2010	Peshawar Hostel
46	Mr. Lal Bahadur	Mr. Taj Akbar	02-02-1985	Mardan	Matric	25-05-2007 as Mali	01-07-2010	Peshawar SEC
47	Mr. Khan Zeb	Mr. Cihraun Haqueemi	11-02-1980	Mardan	Matric	26-05-2007 as Chowkidar	01-07-2010	Peshawar SEC
48	Mr. Humair Arayat Malik	Mr. Anayat Ullah Malik	15-10-1986	Rawalpindi	Matric	26-05-2007 as Attendant	01-07-2010	Peshawar IXX (SW)
49	Mr. Muhammad Ikram	Mr. Abdul Fawab	08-00-1979	Swabi	Matric	26-05-2007 as Chowkidar	01-07-2010	Mardan SEC Peshawar

50	Mr. Rehman Ali	Mr. Gul Ajab Khan	12-05-1979	Karak	Matric	01-08-2007 as Attendant	01-07-2010	SEC Kohat	
51	Mr. Naik Arsal 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/Oasid	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. Dawar 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/Oasid	01-07-2010	SSAIC 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 Jannat 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	