

12.11.2019

Counsel for the appellant present. Asst: AG alongwith Mr. Sagheer Musharraf, AD for official respondents no. 1 to 3 and counsels for private respondents no. 4,6,7,8,10 and 11 present. Arguments heard. To come up for order on 09.12.2019 before D.B.


Member


Member

09.12.2019

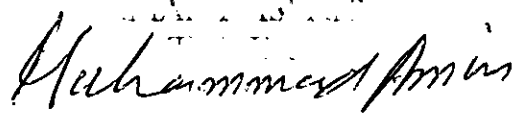
Appellant in person present. Asst: AG alongwith Mr. Sagheer Musharraf, AD for official respondents no. 1 to 3 present. This case was heard by this Tribunal on 12.11.2019 and fixed for order today. However, vide application dated 05.12.2019, learned counsel for the appellant apprised that his legitimate grievances have been redressed at departmental *level* and requested for withdrawal of the instant service appeal.

Application is allowed and the appeal in hand is therefore, dismissed, as withdrawn. File be consigned to the record room.

ANNOUNCED:

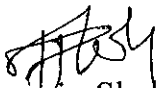
09.12.2019



(AHMAD HASSAN)
MEMBER


(M.AMIN KHAN KUNDI)
MEMBER

01.11.2019

Counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG on behalf of official respondents No. 1 to 3 and private respondents No. 4 & 11 in person present. Private respondents No. 4 & 11 requested for adjournment on the ground that their counsel is not available today. Last chance is granted to private respondents for arguments. Adjourned to 08.11.2019 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

08.11.2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney alongwith Sagheer Musharraf AD for official respondents present. Learned counsel for private respondents No.4, 7, 10 & 11 present. Private respondent No.11 seeks adjournment on behalf of respondent No.6 on the ground that learned counsel for private respondent No.6 is not available. Learned counsel for the appellant raised reservation over further adjournment, hence last opportunity is granted and adjourned for a short date. To come up for arguments on 12.11.2019 before D.B.


Member


Member

17.06.2019

Learned counsel for the appellant and Mr. Riaz Painsdakhel learned Assistant Advocate General for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.08.2019 before D.B.


Member


Member

07.08.2019

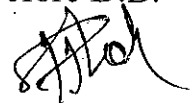
Appellant in person present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Masroor Ahmad J.C present. Appellant seeks adjournment as his counsel is not in attendance. Adjourn. To come up for arguments on 26.09.2019 before D.B. Appellant is directed to provide member copy of the present service appeal on the next date.


Member


Member

26.09.2019

Junior counsel for the appellant present. Mr. Usman Ghani, District Attorney for official respondents No. 1 to 3 and Syed Iqbal Shah, Advocate on behalf of private respondent No. 6 present and submitted Vakalatnama. Junior counsel for the appellant seeks adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned to 01.11.2019 for arguments before D.B.


(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

14.01.2019

Counsel for the appellant present. Mr. Sagheer Musharraf, AD (Lit) alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present. Rejoinder on behalf of the appellant submitted which is placed on file. Case to come up for arguments on 07.03.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

07.03.2019

Clerk to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Clerk to counsel for the appellant seeks adjournment on the ground that learned counsel for the appellant is not available. Adjourn. To come up for arguments on 26.04.2019 before D.B


Member



Member

26.04.2019

Clerk to counsel for the appellant and Adll: AG for the respondents present. Rejoinder on behalf of the appellant submitted, which is placed on file.

Due to general strike on the call of Bar Association instant matter is adjourned to 17.06.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

09.08.2018

Mr. Taimur Ali Khan, Advocate counsel for the appellant present. Mr. Sagheer Musharraf, AD alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted. The latter requested for adjournment. Grnated. To come up for written reply on 08.10.2018 before S.B.



Chairman

08.10.2018

Counsel for the appellant Mr. Timur Ali Advocate present. Mr. Saghir Musharaf, A.D alongwith Mr. Usman Ghani, District Attorney for the official respondent present and reply submitted. None present on behalf of private respondents. To come up for written reply of private respondents on 26.11.2018 before S.B.




Chairman

26.11.2018

Counsel for the appellant present. . Addl. AG alongwith Saghir Musharaf, AD for the respondents present. None present on behalf of the private respondents.

The matter is adjourned for hearing before a Division Bench on 14.1.2019. The private respondents are allowed further time for furnishing their written reply, if they so wish. The same shall be submitted within 15 days otherwise, the matter would be heard on available record.



Chairman

224/2018

16.05.2018

Clerk of counsel for the appellant, Mr. Kabirullah Khattak, Addl. A.G alongwith Saghir Musharaf, Assistant Director (Litigation) for the official respondents present. Mr. Muhammad Taif Khan, Advocate for private respondents No. 4, 7, 8, 10 and 11 present. Learned Addl. AG and counsel for private respondents requested for time to submit written reply. Request is accepted. Fresh notices be issued to other private respondents. To come up for written reply/comments on 09.07.2018 before S.B.


Chairman

09.07.2018

Junior counsel for the appellant and Mr. Sardar Shoukat Hayat, Addl. AG alongwith Mr. Sagheer Musharraaf, AD (Lit) for official respondents No. 1 to 3 and counsel for private respondents No. 4, 7, 8, 10 & 11 present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 9.08.2018 before S.B.


Member

26.03.2018

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving in District Population Welfare Department BPS-17 on contract basis. It was further contended that the appellant alongwith other were regularized by the respondent-department on the basis of 2009 Regularization Act. It was further contended that the respondent-department sought opinion from the Law Department about seniority and the Law Department furnished its opinion. It was further contended that the Law Department gave its opinion that the seniority is to be determined in accordance with the sub-rule 2 of Section-4 of the Act and their seniority shall be determined on the basis of their continuous officiation in such service. It was further contended that the appellant was appointed earlier than the private respondents therefore, the name of the appellant was to be shown senior than the private respondents but the respondent-department has shown the appellant junior to the private respondents therefore, the said seniority list is illegal and liable to be rectified.

The contention raised by learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 16.05.2018 before S.B.

Appellant Deposited
Security & Process Fee

M A K
(Muhammad Amin Khan Kundi)
Member




~~_____~~
~~_____~~
~~_____~~
~~_____~~
come to office within reply/commenation: 09/07/2018 before
S.B.

~~_____~~

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 224/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	16/02/2018	<p>The appeal of Mr. Samiullah presented today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	26/02/18	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/03/18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	08.03.2018	<p>Junior counsel for the appellant present, and seeks adjournment. Adjourned. To come up for preliminary hearing on 26.03.2018 S.B.</p> <p style="text-align: right;"> (Gul Zeb Khan) Member</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 224 /2018

Samiullah

V/S

Govt: of KPK & others.

INDEX

S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	01-04
2.	Copy of stay application	-----	05
2.	Copy of act	---A---	06-09
3.	Copy of tentative list	---B---	10-14
4.	Copy of legal opinion	---C---	15
5.	Copy of list	---D---	16-21
9.	Copy of departmental appeal	---E---	22-23
15.	Vakalat Nama	-----	24

mll
APPELLANT

THROUGH:

Masif Yousafzai
(MASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,

Taimur Ali Khan
(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,

S. Noman Ali Bukhari
(S. NOMAN ALI BUKHARI)
ADVOCATE PESHAWAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 224 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 232

Dated 16-2-2018

Mr. Samiullah, District Population Welfare Officer,
Charsadda.

(Appellant)

VERSUS

1. The Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary Population Welfare Department, Government of Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
3. The Director General Population Welfare Department Government of Khyber Pakhtunkhwa, Peshawar.
4. Mr. Muhammad Tariq Khan, District Population Welfare Officer, Nowshera.
5. Mr. Ayatullah, District Population Welfare Office, Swabi.
6. Mr. Khurshid Ali, District Population Welfare Office, Chitral.
7. Mr. Iftikhar Ahmad, Deputy Demographer, District Population Welfare Office, Hangu.
8. Mr. Ahmad Ali Khan, District Population Welfare Office, Dir Lower.
9. Mr. Amjad Ali Khan, District Population Welfare Office, Nowshera.
10. Mr. Badshah Muhammad, District Population Welfare Office, Dir Lower.
11. Mr. Asif Mehmood, Tehsil Population Welfare Office, Karak.
12. Mr. Arafat Khan Afridi, Agency Population Welfare Officer *Khyber Agency*
13. Mr. Fahad Sarwar, District Population Welfare Office, Nowshera.

(Respondents)

Filed to-day

Registrar

16/2/18

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE FINAL SENIORITY LIST DATED 04.10.2017 WHEREIN THE APPELLANT HAS BEEN SHOW WRONGLY AT SR. No. 32 OF THE LIST AND AGAINST NOT ACTION OF THE DEPARTMENTAL APPEAL OF THE APPELLANT WHICH WAS NOT RESPONDED WITHIN THE STATUTORY PERIOD 90 DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE RESPONDENT MAY BE DIRECTED TO CORRECTLY DRAW THE SENIORITY LIST AND CORRECTLY MENTION THE NAME OF THE APPELLANT PROPERLY AT SR. 22 BY DECLARING THE IMPUGNED SENIORITY LIST AS INCORRECT AND WRONGLY DRAWN AND AGAINST THE SPIRIT OF SECTION 4 KHYBER PAKHTUNKHW REGULARIZATION OF SERVICE ACT, 2009. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed as Population Welfare Department in BS-17 on adhoc/contract basis and was subsequently regularized into service after promulgation of the Khyber Pakhtunkhwa Regularization of Service Act, 2009. (Copy of the Act is attached as **annexure-A.**)
2. That after the regularization of the appellant the respondent department had issued a tentative list in the year 2015 wherein the appellant was at Sr. No. 24. (Copy of the tentative list is attached as **annexure-B.**)
3. That when the issue of seniority was raised for the first time ,the department was compelled to seek advice from the Law Department which in clear terms responded that clearly *Employees regularized under Regularization Act of 2009, the seniority is to be determined in accordance with sub-section-2 of section-4 of the Act and their seniority shall be determined on the basis of their continuous*

officiation in such service or cadre provided that if the date of continuous officiation in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.
(Copy of the legal opinion is attached as Annexure-C).

4. That in utter disregard to the opinion of the Law Department, the respondents issued final seniority list on 04.10.2017 which was not drawn as a spirit of Section-4 (2) of the Regularization Act of 2009.
(Copy of list is attached as Annexure-D).
5. That feeling aggrieved from the above list the appellant filed representation on 03.11.2017 which was not responded within statutory period of 90 days. Hence the instant appeal on the following grounds amongst the others. **(Copy of departmental appeal is attached as Annexure-E).**

GROUNDS:

- A) That the impugned seniority list dated 04.10.2017 and not deciding the representation of the appellant within the statutory period of 90 days is against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) *That sub section-2 of section-4 of the Act, 2009 provides, the inter-se-seniority of the Employees, whose services are regularized under this Act within the same service or cadre shall be determined on the basis of their continuous officiation in such case service or cadre provided that if the date of continuous officiation in the case of two or more Employees is the same, the Employee older in age shall rank senior to the other one.* The respondent has drawn the impugned seniority list in total violation of sub section 2 of section 4 of the Act, 2009.
- C) That the private respondent from Sr. No. 4 to 12 have started officiating their service much after the appellant therefore as per spirit of section 4 (2) of the Regularization Act of 2009 the appellant is required to be shown senior to the private respondents.
- D) That the respondent by drawing a wrong seniority list in violation of Act 2009, affected the seniority of the appellant in an arbitrary and fanciful manner and the same will also affect future prospect of promotion and service rights of the appellant.

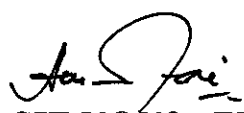
- E) That even the respondents have violated of the opinion of the Law Department given vide dated. 28.11.2016 just to favour of blue eyed person for extending them promotion in a colorful exercise of powers.
- F) That the appellant has not been treated in accordance with law and rules governing the issue of seniority.
- G) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

APPELLANT


Samiullah.

THROUGH:


(M.ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,

&

(S. NOMAN ALI BUKHARI)
ADVOCATE PESHAWAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2018

Samiullah

V/S

Govt: of KPK & others.

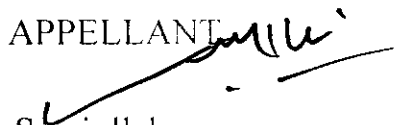
**APPLICATION FOR RESTRAINING THE RESPONDENT
FROM MAKING PROMOTION ON THE BASIS OF
DISPUTED AND WRONGFULLY DRAWN SENIORITY
DATED 04.10.2017**

R. SHEWETH.

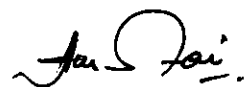
1. That the above appeal has been filed before this august Tribunal in which no date is fixed so for.
2. That the appellatant has a good prima facie case and all the ingredients for stay are in favour of appellatant.
3. That if the respondents are not restrained from making promotion on the basis of disputed seniority list then the appellatant will suffer a lot and the same will also give rise to unnecessary further litigation.
5. That the grounds of main appeal may also be considered as integral part of this application.

It is therefore most humbly prayed that on acceptance of this application the respondents may be restrained from the making of promotions on the basis of disputed seniority list till the disposal of main appeal.

APPELLANT


Samiullah

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,

THE ¹[KHYBER PAKHTUNKHWA]
EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009.
(²[KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009)

CONTENTS

PREAMBLE

SECTIONS

1. Short title and commencement.
2. Definitions.
3. Regularization of services of certain employees.
4. Determination of seniority.
- 4A. Overriding effect.
5. Repeal.

ATTESTED

¹Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
²Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

**THE ³[KHYBER PAKHTUNKHWA]
EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2009.
(⁴[KHYBER PAKHTUNKHWA] ACT NO. XVI OF 2009)**

[First published after having received the assent of the Governor of the ⁵[Khyber Pakhtunkhwa] in the Gazette of ⁶[Khyber Pakhtunkhwa] (Extraordinary), dated the 24th October, 2009]

**AN
ACT**

to provide for the regularization of the services of certain employees appointed on adhoc or contract basis.

WHEREAS it is expedient to provide for the regularization of the services of certain employees appointed on adhoc or contract basis, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:-

1. Short title and commencement.---(1) This Act may be called the ⁷[Khyber Pakhtunkhwa] Employees (Regularization of Services) Act, 2009.

(2) It shall come into force at once.

2. Definitions.---(1) In this Act, unless the context otherwise requires,-

(a) "Commission" means the ⁸[Khyber Pakhtunkhwa] Public Service Commission;

(aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment;

(b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge basis or who are paid out of contingencies;

ATTESTED

³Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
⁴Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
⁵Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
⁶Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
⁷Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
⁸Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

- (c) "Government" means the Government of the ⁹[Khyber Pakhtunkhwa];
- (d) "Government Department" means any department constituted under rule 3 of the ¹⁰[Khyber Pakhtunkhwa] Government Rules of Business, 1985, and does not include any section of a Department or an organization which is federally funded;
- (e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants; and
- (f) "post" means a post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commission.

(2) The expressions "ad hoc or contract appointment" and "civil servant" shall have the same meanings as respectively assigned to them in the ¹¹[Khyber Pakhtunkhwa] Civil Servants Act, 1973 (¹²[Khyber Pakhtunkhwa] Act No. XVIII of 1973).

3. **Regularization of services of certain employees.**---All employees including recommendees of the High Court appointed on contract or ad hoc basis and holding that post on 31st December, 2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

4. **Determination of seniority.**---(1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of this Act shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

(2) The seniority interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

⁹Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
¹⁰Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
¹¹Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011
¹²Substituted vide Khyber Pakhtunkhwa Act No. IV of 2011

ATTESTED

Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

4A. Overriding effect.---Notwithstanding any thing to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

5. Repeal.---The North-West Frontier Province Employees (Regularization of Services) Ordinance, 2009 (N.-W.F.P. Ordinance No. VII of 2009) is hereby repealed.

1-

ATTESTED

Tentative Seniority list of Assistant Directors/

S.No.	Name of Officer	Qualification	Date of birth	Dist
1	2	3	4	5
1	Mr. Sohail Imran AD/DDPWO/TPWO	M.Sc (Stats)	30.12.1975	Abbott
2	Mr. Izhar Khan AD/DDPWO/TPWO	M.A. (Pol.Sc)	15.04.1972	Bunne
3	Mr. Shamsur Rehman Dawar AD/DDPWO/TPWO	M.A. (Pol.Sc)	15.05.1977	N.W A
4	Mr. Saifur Rehman AD/DDPWO/TPWO	M.B.A. (Marketing)	15.04.1970	Abbott
5	Mr. Israr Muhammad Khan AD/DDPWO/TPWO	M.Sc (Stats)	03.01.1974	L. Marw
6	Mr. Asad Ali Shah AD/DDPWO/TPWO	M.B.A.	03.05.1977	Swat
7	Mr. Ayaz Mehmood AD/DDPWO/TPWO	M.A. (Social Work)	27.11.1971	Abbott
8	Muhammad Basit Saeed, Deputy Demographer	M.A (Sociology)	29.08.1980	Mansel
9	Mr. Khalid Mehmood Deputy Demographer	M.A. (Econ)	30.04.1971	L. Marw
10	Mr. Attaullah Khan Deputy Demographer	M.Sc (Econ)	21.07.1977	S.W. Ag
11	Mr. Hussain Ahmed Deputy Demographer	M.Sc.	03.09.1977	Mardar
12	Mr. Asif Malik Deputy Demographer	M.Sc	29.09.1979	Nowsh

02/29/77

Tentative Seniority list of Assistant Directors/Tehsil Population Welfare Officers/Dy. District Population Welfare Officers (N.T) & Dy. Demographers
BPS-17 updated on 08-04-2015

S.No.	Name of Officer	Qualification	Date of birth	Domicile	Date of first entry into Govt. service	Lower Grade (BPS-16)	present grade (BPS-17)	Method of recruitment	Date of Regularization	Present place of posting	Remarks
1	2	3	4		5	6	8	9	10	11	12
1	Mr. Sohail Imran AD/DDPWO/TPWO	M.Sc (Stats)	30.12.1975	Abbottabad	12.01.2004 Contract	-	12.01.2004	Direct	23.07.2005	DDPWO, Haripur	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.
2	Mr. Izhar Khan AD/DDPWO/TPWO	M.A. (Pol.Sc)	15.04.1972	Bunner	12.01.2004 Contract	-	12.01.2004	Direct	23.07.2005	Agency Population Welfare Officer Khyber agency	-do-
3	Mr. Shamsur Rehman Dawar AD/DDPWO/TPWO	M.A. (Pol.Sc)	15.05.1977	N.W Agency	12.01.2004 Contract	-	12.01.2004	Direct	23.07.2005	DPW Officer, Swabi	-do-
4	Mr. Saifur Rehman AD/DDPWO/TPWO	M.B.A. (Marketing)	15.04.1970	Abbottabad	12.01.2004 Contract	-	12.01.2004	Direct	23.07.2005	DDPWO, Abbottabad	-do-
5	Mr. Israr Muhammad Khan AD/DDPWO/TPWO	M.Sc (Stats)	03.01.1974	L.Marwat	12.01.2004 Contract	-	12.01.2004	Direct	12.01.2004	DDPWO, L.Marwat	He was recommended for appointment on contract basis along with his batch mates at S. No. 08 to 25 by the PSC but being already in regular Govt. service, he was appointed on regular basis under circular letter No. SOR-VI(E&AD) 1-13/2003 dated 16-04-2003 and seniority fixed in accordance with the order of merit assigned by the PSC as provided under Rule 17 (1) (a) of NWFP Civil Servants (APT) Rules, 1989.
6	Mr. Asad Ali Shah AD/DDPWO/TPWO	M.B.A.	03.05.1977	Swat	12.01.2004 Contract	-	12.01.2004	Direct	23.07.2005	Dy. District Population Welfare Officer Swat	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.
7	Mr. Ayaz Mehmood AD/DDPWO/TPWO	M.A. (Social Work)	27.11.1971	Abbottabad	12.01.2004 Contract	-	12.01.2004	Direct	23.07.2005	Dy. Principal RTI, Abbottabad	-do-
8	Muhammad Basit Saeed, Deputy Demographer	M.A (Sociology)	29.08.1980	Mansehra	27.03.2004 contract	-	27.03.2004	Direct	23.07.2005	DPW office, Charsadda	-do-
9	Mr. Khalid Mehmood Deputy Demographer	M.A. (Econ)	30.04.1971	L.Marwat	16.08.2004 contract	-	16.08.2004	Direct	23.07.2005	SO, Education Deptt.	-do-
10	Mr. Attaullah Khan Deputy Demographer	M.Sc (Econ)	21.07.1977	S.W. Agency	16.08.2004 contract	-	16.08.2004	Direct	23.07.2005	PHQ Peshawar	-do-
11	Mr. Hussain Ahmed Deputy Demographer	M.Sc.	03.09.1977	Mardan	27.03.2004 contract	-	27.03.2004	Direct	23.07.2005	DPW Office Mardan	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.
12	Mr. Asif Malik Deputy Demographer	M.Sc	29.09.1979	Nowshera	16.08.2004 contract	-	16.08.2004	Direct	23.07.2005	PHQ, Peshawar	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS &
HUMAN RIGHTS DEPARTMENT

No. SO(OP-II)/LD/5-1/2012-VOL-III 2-6384-85
DATED: PESH: THE 28 Nov, 2016

To

The Secretary to Govt of Khyber Pakhtunkhwa,
Population Welfare Department.

Subject: DETERMINATION OF SENIORITY.

Dear Sir,

I am directed to refer to your Department letter No.SOE(PWD) 4-30/ 2012/ Vol-II/ 3074-76 dated 24.11.2016 on the subject noted above and to state that in accordance with sub-section 2 of section 4 of the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009, the inter se seniority of the Employees, whose services are regularized under this Act within the same service or cadre shall be determined on the basis of the continuous officiation in such service and cadre provided that if the date of continuous officiation in the case of two or more Employees is the same, the Employee older in age shall rank senior to the other one.

2. The fore. referred provision of law clearly provides for determination of seniority on the basis of date of continuous officiation. The provision with regard to older age will be applicable in the eventuality, when the date of continuous officiation of two or more Employees is the same, and not in all cases.

Yours Faithfully,

ATTESTED


Section Officer (Opinion-II)

Endst: of even No. & date.

Copy is forwarded to P.S to Secretary Law Department.

D

(16)

(Amended)

1

GOVERNMENT OF KHYBER PAKHTUNKHWA
POPULATION WELFARE DEPARTMENT

NOTIFICATION: -

Dated Peshawar the 04th October, 2017

No. SOE (PWD) 4-30/2012/Vol-II: - In pursuance of Section-8 of KP, Civil Servants Act, 1973 read with Rules 17 of KP-Civil Servants (Appointment, Promotion & Transfer) rules 1989, with the approval of Competent Authority, final seniority list of Assistant Directors/ Tehsil Population Welfare Officers/ DY District Population Welfare Officers (Non-Tech) & Deputy Demographers (BPS-17) Population Welfare, Khyber Pakhtunkhwa as stood on 04-10-2017 is hereby notified/ circulated for general information.

S. No.	Name of Officer	Qualification	Date of birth	Domicile	Date of apptt/promotion in BPS-16	Regular Appointment in present grade		Present place of posting	Remarks
						In BS-17	Method of recruitment		
1	2	3	4	5	6	7	8	9	10
1	Mr. Sohail Imran AD/DDPWO/TPWO	M.Sc (Stats)	30.12.1975	Abbottabad	—	23.07.05	Initial	DPW Officer, Torghar	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.
2	Mr. Izhar Khan AD/DDPWO/TPWO	M.A.(Pol.Sc)	15.04.1972	Bunjer	—	23.07.05	Initial	Agency PWO Khyber agency	-do-
3	Mr. Shamsur Rehman Dawar AD/DDPWO/TPWO	M.A.(Pol.Sc)	15.05.1977	N.W Agency	—	23.07.05	Initial	By transfer to Local Govt. Department	-do-
4	Mr. Saif ur Rehman AD/DDPWO/TPWO	M.B.A. (Marketing)	15.04.1970	Abbottabad	—	23.07.05	Initial	DPW Officer, Kohistan	-do-
5	Mr. Israr Muhammad Khan AD/DDPWO/TPWO	M.Sc(Stats)	03.01.1974	Lakki Marwat	—	12.01.04	Initial	DPW Officer, Karak	He was recommended for appointment on contract basis along with his batch mates at S. No. 01 to 07 by the PSC but being already in regular Govt. service, he was appointed on regular basis under circular letter No. SOR-VI(E&AD) 1-13/2003 dated 16-04-2003 and seniority fixed in accordance with the order of merit assigned by the PSC as provided under Rule 17 (1) (a) of NWFP Civil Servants (APT) Rules, 1989.

ATTESTED

-S. No.	Name of Officer	Qualification	Date of birth	Domicile	Date of apptt/promotion in BPS-16	Regular Appointment in present grade		Present place of posting	Remarks
						In BS-17	Method of recruitment		
6	Mr. Asad Ali Shah AD/DDPWO/TPWO	M.B.A.	03.05.1977	Swat	--	23.07.05	Initial	DPW Office, Swat	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.
7	Mr. Ayaz Mehmood AD/DDPWO/TPWO	M.A. (Social Work)	27.11.1971	Abbottabad	--	23.07.05	Initial	DPW Office Kohistan	-do-
8	M. Basit Saeed, Deputy Demographer	M.A (Sociology)	29.08.1980	Mansehra	--	23.07.05	Initial	DPW office, Charsadda	-do-
9	Mr. Khalid Mehmood Deputy Demographer	M.A.(Econ)	30.04.1971	Lakki Marwat	--	23.07.05	Initial	On deputation to Education Deptt.	His contract appointment has been regularized w-e-f 23-07-2005 under NWFP Civil Servants (Amendment) Act, 2005.
10	Mr. Hussain Ahmed Deputy Demographer	M.Sc.	03.09.1977	Mardan	--	23.07.05	Initial	DPW Office, Mardan	-do-
11	Mr. Asif Malik Deputy Demographer	M.Sc	29.09.1979	Nowshera	--	23.07.05	Initial	DPW Office, Mardan	-do-
12	Miss. Kausar Jabeen Deputy Demographer	M.A.(Econ)	08.06.1978	Haripur	--	23.07.05	Initial	DPW Office, Peshawar	-do-
13	Mr. Janat Gul Deputy Demographer	M.A. (Stats)	06.11.1972	Peshawar	--	23.07.05	Initial	DG Office, Peshawar	-do-
14	Mr. Sadiq ur Rehman Deputy Demographer	M.Sc(Stats)	10.04.1975	Karak	--	23.07.05	Initial	DPW Office, Karak	-do-
15	Mr. Sajjad Ahmed Deputy Demographer	M.Sc (Stats)	20.04.1975	Malakand	--	23.07.05	Initial	DPW Officer, Bunner	-do-
16	Mr. Tahir Ishaq, AD/DDPWO/TPWO	B.A.	01.04.1962	Mansehra	12/09/05	15/04/09	Promotion	DPW Office Abbottabad	--
17	Mr. Zoaq Akhtar, AD/DDPWO/TPWO	M.A.(Econ)	08.06.1962	Mansehra	12/09/05	15/04/09	Promotion	DPW Office Mansehra	--
18	Mr. Gul Hassan, AD/DDPWO/TPWO	B.A.	01.06.1961	Abbottabad	12/09/05	15/04/09	Promotion	DDPWO, Abbottabad	--
19	Mr. Taj Mohammad Deputy Demographer	M.A.(Econ)	16.04.1966	Mohmand Agency	12/09/05	15/04/09	Promotion	DDPWO, Bunner	--

ATTESTED

18

S. No.	Name of Officer	Qualification	Date of birth	Domicile	Date of apptt/promotion in BPS-16	Regular Appointment in present grade		Present place of posting	Remarks
						In BS-17	Method of recruitment		
20	Mr. Nasim Ullah Deputy Demographer	M.A (Econ)	24.04.1966	Mohmand Agency	12/09/05	15/04/09	Promotion	DG Office, Peshawar	
21	Mr. Saeed-ur- Rehman, AD/DDPWO/TPWO	M.A(Pol.Sc)	10.05.1970	Shangla		24.09.09	Initial	DPW Officer, Shangla	Adhoc appointments regularized vide 13.6.09 x promulgation of Ordinance i.e. 24/09/2009.
22	Muhammad Tariq Khan, AD/DDPWO/TPWO	M.A. (Anthropology)	28.02.1975	Nowshera		24.09.09	Initial	DPW Officer, Nowshera	17.6.09 -do- 17.6.09
23	AyatUllah, Deputy Demographer	M.Sc(Stats)	20.09.1975	Nowshera	--	24.09.09	Initial	DPW Office, Swabi	19.6.09 -do- 19.6.09
24	Khurshid Ali, AD/DDPWO/TPWO	M.P.A.	01.02.1976	Chitral	--	24.09.09	Initial	DPW Officer, Chitral	17.6.09 -do- 17.6.09 Arrival date
25	Iftikhar Ahmad, Deputy Demographer	M.Sc(Stats)	20.03.1976	Peshawar	--	24.09.09	Initial	DPWO, Hangu	18.6.09 -do- 18.6.09
26	Ahmed Ali Khan, AD/DDPWO/TPWO	M.A. (Sociology)	21.03.1976	Dir (L)	--	24.09.09	Initial	DPW Office, Dir (Lower)	15.6.09 -do- 15.6.09 x
27	Amjad Ali Khan AD/DDPWO/TPWO	MBA	15.09.1976	Peshawar	--	24.09.09	Initial	DPW Office, Nowshera	16.6.09 -do- 16.6.09
28	Badshah Muhammad, Deputy Demographer	M.A (Sociology)	12.04.1977	Dir (L)	--	24.09.09	Initial	DPW Office, Dir(L)	24.6.09 -do- 24.6.09
29	Asif Mehmood, AD/DDPWO/TPWO	M.Sc (Chemistry)	20.04.1977	Karak	--	24.09.09	Initial	TPWO DPW Office Karak	18.6.09 -do- 18.6.09
30	Arafat Khan Afridi, AD/DDPWO/TPWO	M.A. (Pol.Sc)	13.05.1977	Khyber Agency	--	24.09.09	Initial	Agency PW Officer	15.6.09 -do- 15.6.09 x
31	Fahad Sarwar AD/DDPWO/TPWO	M.A(Econ)	03.03.1978	Nowshera	--	24.09.09	Initial	DPW Office, Nowshera	24.6.09 -do- 24.6.09
32	Samjullah Khan, AD/DDPWO/TPWO	M.A (Pol.Sc)	02.07.1979	Peshawar	--	24.09.09	Initial	DPW Officer, Charsadda	13.6.09 -do- 13.6.09.
33	Asghar Khan, AD/DDPWO/TPWO	M.A History/Pol.Sc	05.02.1980	Mardan	--	24.09.09	Initial	DPW Officer Dir Upper	17.6.09 -do- 17.6.09

ATTACHED

S. No.	Name of Officer	Qualification	Date of birth	Domicile	Date of apptt/promotion in BPS-16	Regular Appointment in present grade		Present place of posting	Remarks
						In BS-17	Method of recruitment		
34	Sana Ullah AD/DDPWO/TPWO	M.A (Pol.Sc)	15.09.1980	Charsadda	—	24.09.09	Initial	DPW office, Charsadda	15.6.09 -do- 15.6.09
35	Ruby Hashim, AD/DDPWO/TPWO	M.A Anthropology	28.11.1981	Moh: Agency	—	24.09.09	Initial	DG Office Peshawar	-do-
36	Muhammad Qasim, Deputy Demographer	M.Sc(Econ)	27.02.1982	Haripur	--	24.09.09	Initial	DPW Office, Haripur	-do-
37	Bashir Muhammad, AD/DDPWO/TPWO	MBA	3.6.1982	Hangu	--	24.09.09	Initial	DPW Office, Hangu	-do-
38	Fazal Azeem, AD/DDPWO/TPWO	MBA	25.06.1983	Charsadda	—	24.09.09	Initial	DPW Office, Charsadda	-do-
39	M.Waqar Akhunzada, AD/DDPWO/TPWO	MBA	15.12.1983	Moh: Agency	—	24.09.09	Initial	DPW office, Charsadda	-do-
40	Shahid Khan AD/DDPWO/TPWO	M.A (Sociology)	10.04.1984	Malakand	—	24.09.09	Initial	DPW Officer, Malakand	-do-
41	Sidra Nisar, Deputy Demographer	M.Sc(Stats)	21.02.1985	Peshawar	—	24.09.09	Initial	DPW office, Charsadda	-do-
42	Bilal Khan Afridi, AD/DDPWO/TPWO	MBA	15.10.1986	Khyber Agency	—	24.09.09	Initial	DPW Office, Kohistan	-do-
43	Eid-ur-Rehman, Deputy Demographer	M.Sc Sociology	14/02/1975	Karak	—	25.06.10	Initial	DPW Office, D.I.Khan	Seniority placed as per merit order of PSC, KPK vide their recommendation letter No. NWFP-PSC-SR-VI/51126 dated 31-10-2009
44	Amin Ullah, Deputy Demographer	M.Sc Sociology	10/04/1979	Karak	—	25.06.10	Initial	RTI, Peshawar	-do-
45	Niaz Ahmad, Deputy Demographer	M.Sc Sociology	06/04/1976	Karak	—	25.06.10	Initial	DPW Office, Kohat	-do-

ATTESTED

20

5

S/No.	Name of Officer	Qualification	Date of birth	Domicile	Date of apptt/promotion in BPS-16	Regular Appointment in present grade		Present place of posting	Remarks
						In BS-17	Method of recruitment		
46	Rashid Ahmad, AD/DDPWO(N.T)/TPWO	M.A (Political Science)	20/04/1981	Lakki Marwat	--	25.06.10	Initial	on Deputation IPC Department	-do-
47	Jehan Badshah, AD/DDPWO(N.T)/TPWO	MBA	10/01/1979	Dir (L)	--	25.06.10	Initial	DPW Office, Dir (Upper)	-do-
48	Muhammad Ashfaq, AD/DDPWO(N.T)/TPWO	M.A (Political Science)	02/04/1973	Abbottabad	--	31.10.11	Initial	DPW Office, Peshawar	-do-
49	Sadiq Alam, AD/DDPWO(N.T)/TPWO	MBA	01/01/1983	Malakand	--	31.10.11	Initial	DPW Office, Malakand	-do-
50	Umer Farooq, AD/DDPWO(N.T)/TPWO	MBA	25/03/1983	Nowshera	--	31.10.11	Initial	DPW Office, Nowshera	-do-
51	Abdul Qadeer, AD/DDPWO(N.T)/TPWO	M.A (Political Science)	01/05/1975	S.W.Agency	--	31.10.11	Initial	DPW Office, Hangu	-do-
52	Noor Hakim, AD/DDPWO(N.T)/TPWO	M.A (Political Science)	13/05/1980	S.W.Agency	--	31.10.11	Initial	DPW Office, Bannu	-do-
53	Jehanzeb Khan, AD/DDPWO(N.T)/TPWO	MPA	05/05/1979	S.W.Agency	--	31.10.11	Initial	DPW Officer, Tank	-do-
54	Noor Muhammad, AD/DDPWO(N.T)/TPWO	M.A (Pol.Sc)	15/08/1970	S.W.Agency	--	31.10.11	Initial	RTI, Abbottabad	-do-
55	Sagheer Musharraf, AD/DDPWO(N.T)/TPWO	M.A (Pol.Sc)	01/01/1978	Mansehra	--	31.10.11	Initial	DG Office, Peshawar	-do-
56	Mr. Bakhtiar Khan, AD/DDPWO(N.T)/TPWO	M.A (Pashto)	15.08.1964	Peshawar	18-05-2006	13.01.10	Promotion	DPW Office, Charsadda	Date of their promotion was subsequent to PSC recommendation of the officers from S.No. 46 to 55
57	Habib-ur-Rehman Sandeela AD/DDPWO(N.T)/TPWO	Matric	13.03.1961	D.I.Khan	13-08-2003	13.01.10	Promotion	DPW Office, Mansehra	-
58	Izaz Ahmad Jan, AD/DDPWO(N.T)/TPWO	MA, Sociology	09.04.1962	Charsadda	17.08.2009	13.08.11	Promotion	RTI, Peshawar	-
59	Muhammad Yousaf, Deputy Demographer	MA, Economics	05.01.1974	D.I.Khan	17.08.09	13.08.11	Promotion	DPW Office, Tank	-

ATTESTED

21

S. No.	Name of Officer	Qualification	Date of birth	Domicile	Date of appt/promotion in BPS-16	Regular Appointment in present grade		Present place of posting.	Remarks
						In BS-17	Method of recruitment		
60	Kashif Fida, AD/DDPWO(N.T)/TPWO	M.Sc (Hon)	17.05.1974	Peshawar	17.08.09	13.08.11	Promotion	DG Office, Peshawar	
61	Mujeebullah, Deputy Demographer	MPA	08.02.1976	D.I.Khan	17.08.09	13.08.11	Promotion	TPWO, Kulachi, D.I.Khan	
62	Shah Farooq Deputy Demographer	MS Economics	15.04.1986	Khyber Agency	08.02.2016	08.02.16	Initial	DPW Office Hangu	

SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA
POPULATION WELFARE DEPARTMENT

Dated Peshawar the 04th October, 2017

No. SOE (PWD) 4-30/2012/Vol-II

Copy forwarded to the: -

1. Director General, Population Welfare Department Peshawar.
2. All District Population Welfare Officers in Khyber Pakhtunkhwa.
3. PS to Chief Secretary, Khyber Pakhtunkhwa Peshawar.
4. PS to Secretary Establishment, Govt. of Khyber Pakhtunkhwa Peshawar.
5. PS to Secretary Population welfare Department, Govt. of Khyber Pakhtunkhwa Peshawar.
6. PS to Advisor to CM for PWD, Khyber Pakhtunkhwa Peshawar.
7. Master File.

[Signature]
SECTION OFFICER (Establishment)
Phone No. 091-9223623

ATTESTED

£ (22)

✗

BEFORE THE CHIEF MINISTER, KHYBER PAKHTUNKHWA

Through: Proper Channel

Subject:- **APPEAL AGAINST FIXATION OF SENIORITY OF ADHOC EMPLOYEES IN SHEER VIOLATION OF KP (REGULARIZATION OF SERVICES) ACT 2009**

Dear Sir,

Respectfully it is submitted that Population Welfare Department made 22 adhoc appointments against the post of assistant Director / Deputy Demographer (BPS-17) on need basis in June 2009. They, being adhoc employees, were not kept on the seniority list of the regular employees of the respective cadre. However, every adhoc employee was aware of his inter-se seniority position accrued to him by virtue of date of joining service (date of arrival).

2. Upon promulgation of KP (Regularization of Services) Act 2009 (**Annex-I**) all Provincial Government Departments regularized services of their adhoc employees and fixed their interse seniority from the date of continuous officiation in service (date of joining/arrival) as provided in Section 4(2) of the Act *ibid*. Section 4(2) is reproduced as under:-

Determination of Seniority

Section 4(2)-" The seniority interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

Provided that if the date of continuous officiation in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one".

3. The Population Welfare Department, too, circulated a tentative seniority list of the cadre on 08-04-2015 by fixing interse seniority of the adhoc (regularized) employees on the basis of continuous officiation in service (date of joining/arrival) and age factor where applicable as provided in Section 4(2) of the said Act (**Seniority Annex-II**) at par with the other Departments.

4. However, the Population Welfare Department issued a final seniority list of the service cadre on 04-10-2017 by fixing interse seniority of the adhoc (regularized) employees on the basis of age, contradicting the tentative seniority list and ignoring the continuous officiation in service (**Annex-III**). The instant seniority list has not only dismayed and frustrated the adhoc (regularized) employees but this is also an act of sheer violation of the provisions of the KP (Regularization of Services) Act 2009 on the part of the Department.

ATTESTED

5. According to the Act, fixation of seniority on the basis of age is applicable where date of continuous officiation in service of two or more employees is the same, the employee older in age shall rank senior to the younger one. This provision is **Not Applicable** to the whole lot of the cadre. on a reference by the Population Welfare Department, the Law Department advised vide letter No. SO(OP-II/LD/5-1/2012-VOL-III/26384-85 that:-

"The provision of law clearly provides for determination of seniority on the basis of date of continuous officiation. The provision with regard to older age will be applicable in the eventuality, when the date of continuous officiation of two or more employees is the same, and not in all cases" (Annex-IV).

6. The final seniority list dated 04-10-2017 is disputed and cannot be put into practice on the following grounds:-

- I. It has been issued in violation of Section 4(2) of KP (Regularization of Services) Act 2009.
- II. It has been issued as final without circulating provisionally/tentatively, which is a clear violation of rules.
- III. It clearly speaks of giving undue favours to some favourite.
- IV. Education Department issued seniority list of adhoc (regularized) employees on the basis of date of continuous officiation in service i.e date of arrival of every individual **(Annex-V)**
- V. It is discriminatory and prejudiced to the right of others.

7. In light of the above facts, it is requested that Population Welfare Department may please be directed to withdraw the final seniority list of Assistant Director/Deputy Demographers (BS-17) dated 04-10-2017 and issue the seniority list in accordance with Section 4(2) of the KP (Regularization of Services) Act 2009 as already tentatively issued on 08-04-2015.

Your Faithfully

ATTESTED

(Signature)
(SAMIULLAH KHAN)
District Population Welfare Officer
Charsadda

VAKALAT NAMA

NO. _____/2018

IN THE COURT OF Service Tribunal, Peshawar

Sami ullah (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Govt. of KPK (Respondent)
(Defendant)

I/We, Samiullah

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

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. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated 16-02 /2018

[Signature]
(CLIENT)

ACCEPTED

[Signature]
M. ASIF YOUSAFZAI
Advocate Supreme Court
Peshawar.



[Signature]
Taimur Ali Khan
Advocate High Court

[Signature]
Syed Nauman Ali Bukhari
Advocate

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)

Before The KPK Service Tribunal Peshawar

قیمت 50 روپے	 	38806
ایڈوکیٹ: محمد طارق خان		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
بار کونسل ایسوسی ایشن نمبر:		
رابطہ نمبر: 03339133004		

بعدالت جناب:

مخائب: 4-7-9-11-12 Reparatus	دعویٰ: Service Appeal
The Chief Sect. and others بنام Samiullah	ملک نمبر: NO: 224
	مورخہ:
	جرم:
	تخلیہ:

باعت تحریر آئکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی کاروائی متعلقہ درجہ
آن مقام کیلئے محمد طارق خان ایڈووکیٹ اور علی احمد کوڈیکل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم بیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ بیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 16-05-2018

العبد _____ واہ شد _____ العبد

مقام _____ کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی ذمہ داری کا پورا پورا تقاضا قبول ہوگی۔

A
M. K. Z.

IN THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR.

In Appeal No.224/2018

Sami Ullah DPWO Charsadda (Appellant)

VS

Govt. of Khyber Pakhtunkhwa & others (Respondents)

Index

S.No.	Documents	Annexure	Page
1	Para-wise comments		1-2
2	Affidavit		3



Deponent
Sagheer Musharrat
Assistant Director (Lit)

**IN THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR.**

In Appeal No.224/2018.

Sami Ullah DPWO Charsadda.....(Appellant)

VS

Govt. of Khyber Pakhtunkhwa& others (Respondents)

**JOINT PARA-WISE REPLY/COMMENTS ON BEHALF OF THE
RESPONDENTS NO.2 & 3.**

Respectfully Sheweth,

Preliminary Objections.

1. That the appellant has got not locus standi to file the instant appeal.
2. That no discrimination / injustice has been done to the appellant.
3. That the instant appeal is bad in the eye of law.
4. The appeal is based on distortion of facts and is not maintainable in its present form.
5. That the appellant has come to the Tribunal with un-cleaned hands.
6. That the appellant has been estopped by his own conduct to file the appeal.

On Facts.

1. Pertains to record hence no comments.
2. Pertains to record hence no comments.
3. Incorrect all the Adhoc employees were regularized on 24-10-2009 in pursuance of the employees (Regularization of Service) Act, 2009. The seniority of the regularized employees is determined according to sub section -2 of section-4 of the act. ibid from the date of regularization being the same, the employees older in age shall rank senior to the younger one. The final Seniority list of BPS-17 issued on 04-10-2017 accordingly as per spirit of the act.
4. Incorrect. Every Government Department is bound to act according to law, rules and regulation. While the instant Para has been interpreted by the appellant in his own interest.
5. No comments.

ON GROUNDS.


- A. Incorrect. As explained Para 3of the facts above.
- B. Incorrect. The seniority was issued according to law rules and regulation.
- C. Incorrect. As explained in Para 3 of the facts above.
- D. Incorrect. As explained in Para 3 & 4 of the facts above.
- E. Incorrect verbatim based on distortion of facts.
- F. Incorrect. A repetition of earlier Para's.

34

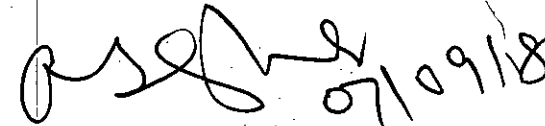
G. Any further grounds raised by the appellant will accordingly be allowed in the light of relevant law, rules and record, with the permission of this Hon'able Court.

PRAYER:-

Keeping in view the above, it is prayed that the instant appeal may kindly be dismissed in the public interest.



Director General
Population Welfare,
Respondent No.3



Secretary to Govt. of Khyber
Pakhtunkhwa
Population Welfare Department
Respondent No.2

IN THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR.

In Appeal No.224/2018.

Sami Ullah DPWO Charsadda.....(Appellant)

VS

Govt. of Khyber Pakhtunkhwa& others(Respondents)

Affidavit

I Mr. Sagheer Musharraf, Assistant Director (Litigation), Directorate General of Population Welfare Department do solemnly affirm and declare on oath that the contents of para-wise comments/reply on behalf of respondents No. 2&3 are true and correct to the best of my knowledge and available record and nothing has been concealed from this Honorable Tribunal.



Deponent
Sagheer Musharraf
Assistant Director (Lit)

IN THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

In Appeal No.224/2018

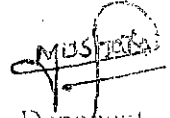
Sami Ullah DPWO Charsadda (Appellant)

VS

Govt. of Khyber Pakhtunkhwa & others (Respondents)

Index

S.No.	Documents	Annexure	Page
1	Para-wise comments		1-2
2	Affidavit		3



Deponent

Sagheer Musharraf
Assistant Director (Lit)

**IN THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR.**

In Appeal No.224/2018:

Sami Ullah DPWO Charsadda..... (Appellant)

VS

Govt. of Khyber Pakhtunkhwa & others (Respondents)

**JOINT PARA-WISE REPLY/COMMENTS ON BEHALF OF THE
RESPONDENTS NO.2 & 3.**

Respectfully Sheweth,

Preliminary Objections.

1. That the appellant has got not locus standi to file the instant appeal.
2. That no discrimination / injustice has been done to the appellant.
3. That the instant appeal is bad in the eye of law.
4. The appeal is based on distortion of facts and is not maintainable in its present form.
5. That the appellant has come to the Tribunal with un-cleaned hands.
6. That the appellant has been estopped by his own conduct to file the appeal.

On Facts:

1. Pertains to record hence no comments.
2. Pertains to record hence no comments.
3. Incorrect all the Adhoc employees were regularized on 24-10-2009 in pursuance of the employees (Regularization of Service) Act, 2009. The seniority of the regularized employees is determined according to sub section -2 of section-4 of the act. ibid from the date of regularization being the same, the employees older in age shall rank senior to the younger one. The final Seniority list of BPS-17 issued on 04-10-2017 accordingly as per spirit of the act.
4. Incorrect. Every Government Department is bound to act according to law, rules and regulation. While the instant Para has been interpreted by the appellant in his own interest.
5. No comments.

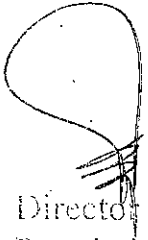
ON GROUNDS.

- A. Incorrect. As explained Para 3 of the facts above.
- B. Incorrect. The seniority was issued according to law rules and regulation.
- C. Incorrect. As explained in Para 3 of the facts above.
- D. Incorrect. As explained in Para 3 & 4 of the facts above.
- E. Incorrect verbatim based on distortion of facts.
- F. Incorrect. A repetition of earlier Para's.

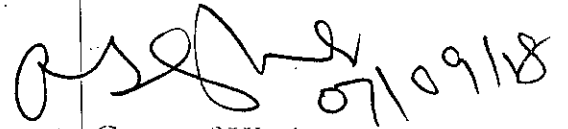
Hon'able Court.

PRAYER:-

Keeping in view the above, it is prayed that the instant appeal may kindly be dismissed in the public interest.



Director General
Population Welfare,
Respondent No.3



07/09/18

Secretary to Govt. of Khyber
Pakhtunkhwa
Population Welfare Department
Respondent No.2

33

**IN THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR.**

In Appeal No.224/2018.

Sami Ullah DPWO Charsadda.....(Appellant)

VS

Govt. of Khyber Pakhtunkhwa& others(Respondents)

Affidavit

I Mr. Sagheer Musharraf, Assistant Director (Litigation), Directorate General of Population Welfare Department do solemnly affirm and declare on oath that the contents of para-wise comments/reply on behalf of respondents No. 2&3 are true and correct to the best of my knowledge and available record and nothing has been concealed from this Honorable Tribunal.



Deponent

Sagheer Musharraf
Assistant Director (Lit)

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 224/2018

Samiullah

vs

Govt: of KPK etc.

.....

REJOINDER ON BEHALF OF APPELLANT

.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

- (1-6) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Para-1 of the appeal is admitted correct by the respondent department as service record has already in the custody of respondent department.
- 2 Para-2 of the appeal is admitted correct by the respondent department as service record has already in the custody of respondent department.
- 3 Incorrect while Para-3 of the appeal is correct. Moreover the respondent drawn the impugned seniority list in total violation of sub section 2 of section 4 of the Regularization Act 2009. Further it is added that the respondent No. 4 to 12 have junior to the appellant because they have started officiating service much after the appellant.
- 4 Incorrect while Par-4 of the appeal is correct. Moreover the seniority dated 04.10.2017 is in total violation of the opinion of Law department given vide dated 28.11.2016.
- 5 Need no comments.

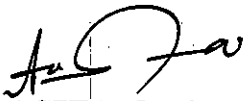
GROUNDS:


- A) Incorrect, while Para-A of the appeal is correct.
- B) Incorrect, while Para-B of the appeal is correct.
- C) Incorrect, while Para-C of the appeal is correct.
- D) Incorrect, while Para-D of the appeal is correct.
- E) Incorrect, while Para-E of the appeal is correct.
- F) Incorrect, while Para-F of the appeal is correct.
- G) Legal.

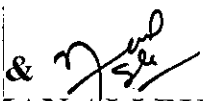
It is, therefore, most humbly prayed that the appeal of appellants may kindly be accepted as prayed for.

APPELLANT

Through:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT

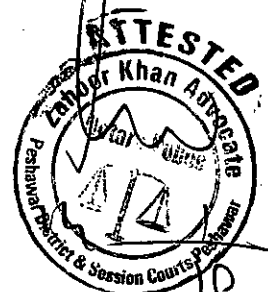

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder and appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.


DEPONENT



BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 224/2018

Samiullah

vs

Govt: of KPK etc.

REJOINDER ON BEHALF OF APPELLANT

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-6) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Para-1 of the appeal is admitted correct by the respondent department as service record has already in the custody of respondent department.
- 2 Para-2 of the appeal is admitted correct by the respondent department as service record has already in the custody of respondent department.
- 3 Incorrect while Para-3 of the appeal is correct. Moreover the respondent drawn the impugned seniority list in total violation of sub section 2 of section 4 of the Regularization Act 2009. Further it is added that the respondent No. 4 to 12 have junior to the appellant because they have started officiating service much after the appellant.
- 4 Incorrect while Par-4 of the appeal is correct. Moreover the seniority dated 04.10.2017 is in total violation of the opinion of Law department given vide dated 28.11.2016.
- 5 Need no comments.


GROUND:

- A) Incorrect, while Para-A of the appeal is correct.
- B) Incorrect, while Para-B of the appeal is correct.
- C) Incorrect, while Para-C of the appeal is correct.
- D) Incorrect, while Para-D of the appeal is correct.
- E) Incorrect, while Para-E of the appeal is correct.
- F) Incorrect, while Para-F of the appeal is correct.
- G) Legal.

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

APPELLANT

Through:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder and appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.


DEPONENT

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

SAMI ULLAH .VERSUS- GOVT. OF KPK & OTHERS

Appeal No. 224/2018

MEMO OF APPEARANCE

Respectfully Sheweth;

I am directed by respondent No.6, Mr. Khurshed Ali, District Population Welfare Officer, Chitral (my client) telephonically that he is unable to appear before this hon'ble tribunal on 17-06-2019. On next date of hearing, he will attest and Submit Wakalatnama positively, hence the memo of appearance.

Dated: 17 $\frac{06}{19}$

~~Abdul~~ Through Counsel.
Syed Jabal Shah
Advocate
High Court.

قیمت
50 روپے

17522



ایڈویکٹ:
بار کونسل/ ایسوسی ایشن نمبر:
رابطہ نمبر: 0333-9196563

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: *خواجہ شمس الدین عظیمی*

مخاطب: <i>السید زینت</i>	دعویٰ: <i>پیس</i>
	علت نمبر:
	مورثہ:
	جرم:
	تھانہ:

بنام آکلو ہسٹریٹسٹو واہ

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ *سید اقبال شاہ* کے لیے *سید اقبال شاہ* اور *خواجہ شمس الدین عظیمی* کے درمیان *سید اقبال شاہ* کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق و زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا کسی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: *خواجہ شمس الدین عظیمی*

11/9/2019

الع
الع

مقام *پشاور* کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

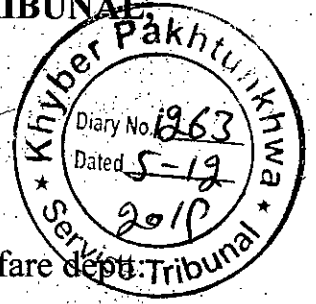
Attested
Advocate
N.S.A

Attested
Fawad Abdul Sattar
Advocate
District Courts

(دستخط ریسٹریٹریٹ)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 223/2018



Sana Ullah

V/S

Population & welfare dept.

.....
**APPLICATION FOR WITHDRAWL OF INSTANT APPEAL AS THE
GRIEVANCE OF THE APPELLANT HAS BEEN REDRESSED BY
THE RESPONDENT DEPARTMENT.**
.....


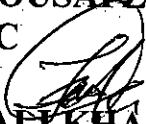
RESPECTFULLY SHEWETH:

1. That the appellant has filed the instant appeal for direction to the respondents to correctly draw the seniority list and correctly mention the name of the appellant according to section-4 of the KP Regularization of Service Act 2009.
2. That the instant was heard by this august Tribunal on 12.11.2019 and next date fixed for order is 09.12.2019, however the grievance of the appellant was redressed by the respondent department as the respondent department revised the disputed seniority according to section 4 of the KP Regularization of Service Act 2009, due to which the name of appellant was properly and correctly placed in the revised seniority list. (Copy of revised seniority list is attached as Annexure-R1.
3. That as the grievance of the appellant was redressed by the respondent department, due to which the instant appeal become infructuous and the appellant wants to withdrawn the instant appeal.

It is, therefore, most humbly prayed that on acceptance of this application, the file may kindly be requisite toady and the appeal may kindly be dismissed as withdrawn.

THROUGH:


APPELLANT

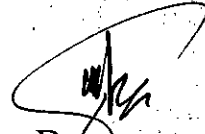

M. ASIF YOUSAFZAI
ASC
&

TAIMUR ALI KHAN
AHC

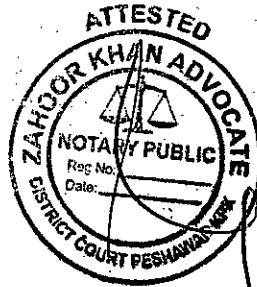
*Not up to the
court also with
original files
Sana Ullah
05/12/19*

Ready

AFFIDAVIT

It is affirmed and declared that the contents of the above Application are true and correct to the best of my knowledge and belief.


Deponent



05 DEC 2019

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
17	Mr. Muhammad Qasim, Dy. Demographer	M. Sc (Economics)	27.02.1982	Haripur	20.06.2009 (adhoc basis)	--	20.06.2009	Initial	DPW Office, Haripur	-do-
18	Mr. Muhammad Waqar Akhuzada, AD/DDPWO/TPWO	MBA	15.12.1983	Mohmand Agency	22.06.2009 (adhoc basis)	--	22.06.2009	Initial	DPW Office, Charsadda	-do-
19	Mr. Badshah Muhammad, Dy. Demographer	M.A (Sociology)	12.04.1977	Dir Lower	24.06.2009 (adhoc basis)	--	24.06.2009	Initial	DPW Office, Dir Lower	-do-
20	Mr. Fahad Sarwar, AD/DDPWO/ TPWO	M.A (Economics)	03.03.1978	Nowshera	24.06.2009 (adhoc basis)	--	24.06.2009	Initial	DPW Office, Nowshera	-do-
21	Mr. Bashir Muhammad, AD/DDPWO/TPWO	MBA	03.06.1982	Hangu.	24.06.2009 (adhoc basis)	--	24.06.2009	Initial	DDPWO (N.T) DPW Office, Hangu	-do-
22	Mr. Bakhtiar, AD/DDPWO/TPWO	M.A	15.08.1954	Peshawar	21.06.1983	18.05.2006	13.01.2010	Promotee	DPWO Dir Upper	The officer was promoted as Assistant Director / DDPWO (NT) / TPWO (BPS-17) on regular basis vide Notification No. SOE(PWD)4-27/07/PC/Vol-IV dated 13-01-2010.
23	Mr. Eid-ur-Rehman, Dy. Demographer	M.Sc (Sociology)	14.02.1975	Karak	25.06.2010	--	25.06.2010	Initial	DPW Office, Lakki Marwat.	Seniority fixed as per merit order of Khyber Pakhtunkhwa Public Service Commission vide letter No. NWFP-PSC-SR-VI/S1126 dated 31.10.2009.
24	Mr. Amin Ullah, Dy. Demographer	M. Sc (Sociology)	10.04.1979	Karak	25.06.2010	--	25.06.2010	Initial	Instructor RTI Peshawar	-do-
25	Mr. Niaz Ahmad, Dy. Demographer	M. Sc (Sociology)	06.04.1976	Karak	25.06.2010	--	25.06.2010	Initial	DPW Office, Kohat	-do-
26	Mr. Rashid Ahmad, AD/DDPWO/TPWO	M.A	20.04.1981	Lakki Marwat	25.06.2010	--	25.06.2010	Initial	On Deputation to IPC Department	Seniority fixed as per order of merit furnished by Khyber Pakhtunkhwa Public Service Commission vide letter No. NWFP-PSC-SR-VI/53315 dated 11-11-2009.

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
27	Mr. Jehan Badshah, AD/DDPWO/TPWO	MBA	10.01.1979	Dir Lower	25.06.2010	--	25.06.2010	Initial	DPW Office, Dir Upper	Seniority fixed on the basis of order of merit furnished by Khyber Pakhtunkhwa Public Service Commission vide letter No. NWFP.PSC SR-VI/5331 dated 11/11/2009.
28	Mr. Muhammad Ashfaq, AD/DDPWO/TPWO	M.A		Abbottabad	31.10.2011	--	31.10.2011	Initial	DPW Office, Peshawar	-do-
29	Mr. Sadiq Alam, AD/DDPWO/TPWO	MBA	01.01.1983	Malakand	31.10.2011	--	31.10.2011	Initial	DPW Office, Malakand	-do-
30	Mr. Umar Farooq, AD/DDPWO/TPWO	MBA	25.03.1983	Nowshera	31.10.2011	--	31.10.2011	Initial	DPW Office, Nowshera	-do-
31	Mr. Abdul Qadeer, AD/DDPWO/TPWO	M.A	01.05.1975	S.W. Agency	31.10.2011	--	31.10.2011	Initial	DPW Office, Hangu	-do-
32	Mr. Noor Hakim, AD/DDPWO/TPWO	M.A	13.05.1980	S.W. Agency	31.10.2011	--	31.10.2011	Initial	DPW Office, Bannu	-do-
33	Mr. Jehan Zeb Khan, AD/DDPWO/TPWO	MPA	05.05.1979	S.W. Agency	31.10.2011	--	31.10.2011	Initial	DPW Office, DIK.	-do-
34	Mr. Noor Muhammad, AD/DDPWO/TPWO	M.A (Pol. Sc)	15.08.1970	S.W. Agency	31.10.2011	--	31.10.2011	Initial	Instructor, RTI Abbottabad	-do-
35	Mr. Sagheer Musharraf, AD/DDPWO/TPWO	M.A (Pol. Sc)	01.01.1978	Mansehra	31.10.2011	--	31.10.2011	Initial	PHQr, Peshawar	-do-
36	Mr. Izaz Ahmad Jan, AD/DDPWO/TPWO	M.A (Sociology)	09.04.1962	Charsadda	02.04.1988 02.07.1997 (absorbed in PWD)	17.08.2009	13.08.2011	Promotee	RTI, Peshawar	The officers promoted from BPS-16 to BPS-17 vide Notification SOE(PWD)4-1/2011/4675083 dated 13/08/2011.
37	Mr. Muhammad Yousaf, Dy. Demographer	M.A (Economics)	05.01.1974	D.I Khan	05.09.2000	17.08.2009	13.08.2011	Promotee	DPW Office, D.I Khan	-do-
38	Mr. Kashif Fida, AD/DDPWO/TPWO	M.Sc (Hon)	17.05.1974	Peshawar	05.09.2000	17.08.2009	13.08.2011	Promotee	PHQr, Peshawar.	-do-

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
39	Mr. Mujeebullah Khan, Dy. Demographer	MPA	08.02.1976	D. I Khan	15.03.2001	17.08.2009	13.08.2011	Promotee	TPWO, Kulachi	-do-
40	Mr. Waheed Khan, AD/DDPWO/TPWO	M.A (Pol. Sc) M.A (Islamiyat) M.A (History)	20.08.1972	Bannu	01.09.2000	09.09.2009	11.11.2015	Promotee	DPW Office, Bannu	The officer promoted to BPS-17 vide Notification No. SOE(PWD)4-42/2015/PC dated 11-11-2015.
41	Mr. Shah Farooq, Dy. Demographer	M.Sc (Economics)	15.04.1986	Khyber Agency	11.02.2016	--	11.02.2016	Direct	DPW Office, Mardan.	--
42	Mr. Abdul Salam, AD/DDPWO(NT)/TPWO	M.Com	02.09.1973	Peshawar	01.09.2000	09.09.2009	08.11.2017	Promotee	AD(RH), DG Office, Peshawar	The officers promoted to BPS-17 vide Notification No. SOE(PWD)4-47/2015-16/DPC dated 08-11-2017.
43	Mr. Amin Khan, AD/DDPWO(NT)/TPWO	B.Com	01.02.1976	Peshawar	01.09.2000	09.09.2009	08.11.2017	Promotee	AD (PC&T) DG Office, Peshawar	do-
44	Mr. Muhammad Kashif Khan, AD/DDPWO(NT)/TPWO	M.A (Economics)	21.07.1977	Nowshera	01.09.2000	22.07.2010	08.11.2017	Promotee	Accounts Officer, DG Office, Peshawar	-do-
45	Mr. Shahid Murad, AD/DDPWO(NT)/TPWO	B. Com, M.A (Urdu)	04.01.1972	Nowshera	02.09.2000	22.07.2010	08.11.2017	Promotee	DPW Office, Peshawar	-do-
46	Mr. Shah Zeb, AD/DDPWO(NT)/TPWO	MBA	14.03.1986	Mohmand Agency	17.12.2012	17.12.2012	08.11.2017	Promotee	TPW Office, Takhtbhai	-do-
47	Mr. Saleem Ullah Khan, AD/DDPWO(NT)/TPWO	MBA	15.09.1987	Tank	12.12.2012	12.12.2012	08.11.2017	Promotee	TPW Office, Tank	-do-
48	Mr. Zia-ul-Haq, AD/DDPWO(NT)/TPWO	M.A	30.10.1976	Karak	23.07.2005	19.12.2013	08.11.2017	Promotee	DPW Office, Karak	-do-
49	Mr. Shahab Ahmed, AD/DDPWO(NT)/TPWO	M.Sc	11.04.1976	Swabi	23.07.2005	19.12.2013	08.11.2017	Promotee	TPW Office, Swabi	-do-
50	Mr. Afsar Khan, AD/DDPWO(NT)/TPWO	M.A (Economics)	11.04.1976	Charsadda	13.08.2004 (contract) 23.07.2005 (Regular)	19.12.2013	08.11.2017	Promotee	Dy. Demographer, DPW Office, Charsadda.	-do-

S.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
51	Mr. Muhammad Tariq, AD/DDPWO(NT)/TPWO	B.Sc	05.01.1977	Khyber Agency	13.08.2004 (contract) 23.07.2005 (Regular)	19.12.2013	08.11.2017	Promotee	AD(M&E), DG Office, Peshawar	-do-
52	Mr. Adnan Saeed AD/DDPWO(NT)/TPWO	MBA	31.12.1986	Charsadda	16.06.2015	16.06.2015	13.12.2018	Promotee	DPW Office, Charsadda.	

-sd-

SECRETARY


GOVT. OF KHYBER PAKHTUNKHWA
POPULATION WELFARE DEPARTMENT

Dated Peshawar the 04th December, 2019

Endst: No. SOE (PWD) 4-30/2019/772-76

Copy forwarded to the: -

1. Secretary Establishment, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Director General Population Welfare Department, Khyber Pakhtunkhwa, Peshawar with the request to circulate the said seniority list amongst all concerned.
3. PSO to Chief Secretary, Govt. of Khyber Pakhtunkhwa.
4. PS to Secretary, Govt. of KPK, PWD, Peshawar.
5. Master file.


SECTION OFFICER (ESTT)
Phone No. 091-9223623



GOVERNMENT OF KHYBER PAKHTUNKHWA,
POPULATION WELFARE DEPARTMENT
02nd Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

Dated Peshawar the 04th December, 2019

NOTIFICATION

No. SOE (PWD) 4-30/2019: In pursuance of Section 8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with rules 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, with approval of the competent authority, final seniority list of Assistant Directors / Tehsil Population Welfare Officers / DDPWOs (Non-Tech) / Deputy Demographers and Accounts Officer (BPS-17) Population Welfare Department Khyber Pakhtunkhwa as stood on 04/12/2019 is hereby notified / circulated for general information of all concerned:-

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
1	Mr. Saeedur Rehman, AD/DDPWO/TPWO	M.A (Pol. Sc)	10.05.1970	Shangla	13.06.2009 (ad hoc basis)	--	13.06.2009	Initial	DPW Office, Shangla	As per decision of the Departmental Progress Review Committee taken in its meeting held on 15-11-2019, the inter-se seniority of ad hoc employees has been revised and determined on the basis of continuous officiation in service (date of joining / arrival and age factor where applicable) as per contents of Section-4(2) of the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 and advices of the Law and Establishment Departments as

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
										well as judgment dated 12/03/2019 of the Khyber Pakhtunkhwa Services Tribunal in case of Mr. Zawar Hussain in Service Appeal No. 56/2018.
2	Mr. Samiullah Khan, AD/DDPWO/TPWO	M.A (Pol. Sc)	02.07.1979	Peshawar	13.06.2009 (ad hoc basis)	--	13.06.2009	Initial	DPW Office, Charsadda	-do-
3	Ms. Sidra Nisar, Dy. Demographer	M.Sc (Stats)	21.02.1985	Peshawar	13.06.2009 (ad hoc basis)	--	13.06.2009	Initial	DPW Office, Charsadda	-do-
4	Mr. Arafat Khan Afridi, AD/DDPWO/TPWO	M.A (Pol. Sc)	13.05.1977	Khyber Agency	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	Agency PW Officer	-do-
5	Mr. Sana Ullah, AD/DDPWO/TPWO	M.A (Pol. Sc)	15.09.1980	Charsadda	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW Office, Charsadda	-do-
6	Mr. Fazal Azeem, AD/DDPWO/TPWO	MBA	25.06.1983	Charsadda	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW office, Charsadda	-do-
7	Mr. Shahid Khan, AD/DDPWO/TPWO	M.A (Sociology)	10.04.1984	Malakand	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW Office, Malakand	-do-
8	Mr. Bilal Khan Afridi, AD/DDPWO/TPWO	MBA	15.10.1986	Khyber Agency	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW Office, Kohistan	-do-
9	Mr. Amjad Ali Khan, AD/DDPWO/TPWO	MBA	15.09.1976	Peshawar	16.06.2009 (ad hoc basis)	--	16.06.2009	Initial	DPW Office, Mardan	-do-
10	Mr. Muhammad Tariq Khan, AD/DDPWO/TPWO	M.A (Anthropology)	28.02.1975	Nowshera	17.06.2009 (ad hoc basis)	--	17.06.2009	Initial	DPW Office, Nowshera	-do-
11	Mr. Khurshid Ali, AD/DDPWO/TPWO	M.P.A.	01.02.1976	Chitral	17.06.2009 (ad hoc basis)	--	17.06.2009	Initial	DPW Office, Chitral	-do-
12	Mr. Asghar Khan, AD/DDPWO/TPWO	M.A (History)	05.02.1980	Mardan	17.06.2009 (ad hoc basis)	--	17.06.2009	Initial	DPW Office, Dir (Upper)	-do-
13	Mr. Iftikhar Ahmad, Deputy Demographer	M.Sc (Stats)	20.3.1976	Peshawar	18.06.2009 (ad hoc basis)	--	18.06.2009	Initial	DPW Office, Karak	-do-
14	Mr. Asif Mehmood, AD/DDPWO/TPWO	M.Sc (Chemistry)	20.04.1977	Karak	18.06.2009 (ad hoc basis)	--	18.06.2009	Initial	TPWO DPW Office, Karak	-do-
15	Mr. Ayat Ullah, Dy. Demographer	M.Sc. (Stats.)	20.09.1975	Nowshera	19.06.2009 (ad hoc basis)	--	19.06.2009	Initial	DPW Office, Swabi	-do-
16	Ms. Ruby Hashim, AD/DDPWO/TPWO	M.A (Anthropology)	28.11.1981	Mohmand Agency	20.06.2009 (ad hoc basis)	--	20.06.2009	Initial	DG, PW Office, Peshawar	-do-

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
17	Mr. Muhammad Qasim, Dy. Demographer	M. Sc (Economics)	27.02.1982	Haripur	20.06.2009 (ad hoc basis)	--	20.06.2009	Initial	DPW Office, Haripur	-do-
18	Mr. Muhammad Waqar Akhuzada, AD/DDPWO/TPWO	MBA	15.12.1983	Mohmand Agency	22.06.2009 (ad hoc basis)	--	22.06.2009	Initial	DPW Office, Charsadda	-do-
19	Mr. Badshah Muhammad, Dy. Demographer	M.A (Sociology)	12.04.1977	Dir Lower	24.06.2009 (ad hoc basis)	--	24.06.2009	Initial	DPW Office, Dir Lower	-do-
20	Mr. Fahad Sarwar, AD/DDPWO/ TPWO	M.A (Economics)	03.03.1978	Nowshera	24.06.2009 (ad hoc basis)	--	24.06.2009	Initial	DPW Office, Nowshera	-do-
21	Mr. Bashir Muhammad, AD/DDPWO/TPWO	MBA	03.06.1982	Hangu	24.06.2009 (ad hoc basis)	--	24.06.2009	Initial	DDPWO (N.T) DPW Office, Hangu	-do-
22	Mr. Bakhtiar, AD/DDPWO/TPWO	M.A	15.08.1954	Peshawar	21.06.1983	18.05.2006	13.01.2010	Promotee	DPWO Dir Upper	The officer was promoted as Assistant Director / DDPWO (NT) / TPWO (BPS-17) on regular basis vide Notification No. SOE(PWD)4-27/07/PC/ Vol-IV dated 13-01-2010.
23	Mr. Eid-ur-Rehman, Dy. Demographer	M.Sc (Sociology)	14.02.1975	Karak	25.06.2010	--	25.06.2010	Initial	DPW Office, Lakki Marwat.	Seniority fixed as per merit order of Khyber Pakhtunkhwa Public Service Commission vide letter No. NWFP-PSC-SR-VI/51126 dated 31.10.2009.
24	Mr. Amin Ullah, Dy. Demographer	M. Sc (Sociology)	10.04.1979	Karak	25.06.2010	--	25.06.2010	Initial	Instructor RTI Peshawar	-do-
25	Mr. Niaz Ahmad, Dy. Demographer	M. Sc (Sociology)	06.04.1976	Karak	25.06.2010	--	25.06.2010	Initial	DPW Office, Kohat	-do-
26	Mr. Rashid Ahmad, AD/DDPWO/TPWO	M.A	20.04.1981	Lakki Marwat	25.06.2010	--	25.06.2010	Initial	On Deputation to IPC Department	Seniority fixed as per order of merit furnished by Khyber Pakhtunkhwa Public Service Commission vide letter No. NWFP-PSC-SR-VI/53315 dated 11-11-2009.

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
27	Mr. Jehan Badshah, AD/DDPWO/TPWO	MBA	10.01.1979	Dir Lower	25.06.2010	--	25.06.2010	Initial	DPW Office, Dir Upper	Seniority fixed on the basis of order of merit furnished by Khyber Pakhtunkhwa Public Service Commission vide letter No. NWFP.PSC SR-VI/5331 dated 11/11/2009.
28	Mr. Muhammad Ashfaq, AD/DDPWO/TPWO	M.A		Abbottabad	31.10.2011	--	31.10.2011	Initial	DPW Office, Peshawar	-do-
29	Mr. Sadiq Alam, AD/DDPWO/TPWO	MBA	01.01.1983	Malakand	31.10.2011	--	31.10.2011	Initial	DPW Office, Malakand	-do-
30	Mr. Umar Farooq, AD/DDPWO/TPWO	MBA	25.03.1983	Nowshera	31.10.2011	--	31.10.2011	Initial	DPW Office, Nowshera	-do-
31	Mr. Abdul Qadeer, AD/DDPWO/TPWO	M.A	01.05.1975	S.W. Agency	31.10.2011	--	31.10.2011	Initial	DPW Office, Hangu	-do-
32	Mr. Noor Hakim, AD/DDPWO/TPWO	M.A	13.05.1980	S.W. Agency	31.10.2011	--	31.10.2011	Initial	DPW Office, Bannu	-do-
33	Mr. Jehan Zeb Khan, AD/DDPWO/TPWO	MPA	05.05.1979	S.W. Agency	31.10.2011	--	31.10.2011	Initial	DPW Office, DIK.	-do-
34	Mr. Noor Muhammad, AD/DDPWO/TPWO	M.A (Pol. Sc)	15.08.1970	S.W. Agency	31.10.2011	--	31.10.2011	Initial	Instructor, RTI Abbottabad	-do-
35	Mr. Sagheer Musharraf, AD/DDPWO/TPWO	M.A (Pol. Sc)	01.01.1978	Mansehra	31.10.2011	--	31.10.2011	Initial	PHQr, Peshawar	-do-
36	Mr. Izaz Ahmad Jan, AD/DDPWO/TPWO	M.A (Sociology)	09.04.1962	Charsadda	02.04.1988 02.07.1997 (absorbed in PWD)	17.08.2009	13.08.2011	Promotee	RTI, Peshawar	The officers promoted from BPS-16 to BPS-17 vide Notification SOE(PWD)4-1/2011/4675083 dated 13/08/2011.
37	Mr. Muhammad Yousaf, Dy. Demographer	M.A (Economics)	05.01.1974	D.I Khan	05.09.2000	17.08.2009	13.08.2011	Promotee	DPW Office, D.I Khan	-do-
38	Mr. Kashif Fida, AD/DDPWO/TPWO	M.Sc (Hon)	17.05.1974	Peshawar	05.09.2000	17.08.2009	13.08.2011	Promotee	PHQr, Peshawar.	-do-

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
39	Mr. Mujeebullah Khan, Dy. Demographer	MPA	08.02.1976	D. I Khan	15.03.2001	17.08.2009	13.08.2011	Promotee	TPWO, Kulachi	-do-
40	Mr. Waheed Khan, AD/DDPWO/TPWO	M.A (Pol. Sc) M.A (Islamiyat) M.A (History)	20.08.1972	Bannu	01.09.2000	09.09.2009	11.11.2015	Promotee	DPW Office, Bannu	The officer promoted to BPS-17 vide Notification No. SOE(PWD)4-42/2015/PC dated 11-11-2015.
41	Mr. Shah Farooq, Dy. Demographer	M.Sc (Economics)	15.04.1986	Khyber Agency	11.02.2016	--	11.02.2016	Direct	DPW Office, Mardan.	--
42	Mr. Abdul Salam, AD/DDPWO(NT)/TPWO	M.Com	02.09.1973	Peshawar	01.09.2000	09.09.2009	08.11.2017	Promotee	AD(RH), DG Office, Peshawar	The officers promoted to BPS-17 vide Notification No. SOE(PWD)4-42/2015-16/DPC dated 08-11-2017.
43	Mr. Amin Khan, AD/DDPWO(NT)/TPWO	B.Com	01.02.1976	Peshawar	01.09.2000	09.09.2009	08.11.2017	Promotee	AD (PC&T) DG Office, Peshawar	do-
44	Mr. Muhammad Kashif Khan, AD/DDPWO(NT)/TPWO	M.A (Economics)	21.07.1977	Nowshera	01.09.2000	22.07.2010	08.11.2017	Promotee	Accounts Officer, DG Office, Peshawar	-do-
45	Mr. Shahid Murad, AD/DDPWO(NT)/TPWO	B. Com, M.A (Urdu)	04.01.1972	Nowshera	02.09.2000	22.07.2010	08.11.2017	Promotee	DPW Office, Peshawar	-do-
46	Mr. Shah Zeb, AD/DDPWO(NT)/TPWO	MBA	14.03.1986	Mohmand Agency	17.12.2012	17.12.2012	08.11.2017	Promotee	TPW Office, Takhtbhai	-do-
47	Mr. Saleem Ullah Khan, AD/DDPWO(NT)/TPWO	MBA	15.09.1987	Tank	12.12.2012	12.12.2012	08.11.2017	Promotee	TPW Office, Tank	-do-
48	Mr. Zia-ul-Haq, AD/DDPWO(NT)/TPWO	M.A	30.10.1976	Karak	23.07.2005	19.12.2013	08.11.2017	Promotee	DPW Office, Karak	-do-
49	Mr. Shahab Ahmed, AD/DDPWO(NT)/TPWO	M.Sc	11.04.1976	Swabi	23.07.2005	19.12.2013	08.11.2017	Promotee	TPW Office, Swabi	-do-
50	Mr. Afsar Khan, AD/DDPWO(NT)/TPWO	M.A (Economics)	11.04.1976	Charsadda	13.08.2004 (contract) 23.07.2005 (Regular)	19.12.2013	08.11.2017	Promotee	Dy. Demographer, DPW Office, Charsadda.	-do-

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
51	Mr. Muhammad Tariq, AD/DDPWO(NT)/TPWO	B.Sc	05.01.1977	Khyber Agency	13.08.2004 (contract) 23.07.2005 (Regular)	19.12.2013	08.11.2017	Promotee	AD(M&E), DG Office, Peshawar	-do-
52	Mr. Adnan Saeed AD/DDPWO(NT)/TPWO	MBA	31.12.1986	Charsadda	16.06.2015	16.06.2015	13.12.2018	Promotee	DPW Office, Charsadda.	

-sd-

SECRETARY


GOVT. OF KHYBER PAKHTUNKHWA
POPULATION WELFARE DEPARTMENT

Dated Peshawar the 04th December, 2019

Endst: No. SOE (PWD) 4-30/2019/772-76

Copy forwarded to the: -

1. Secretary Establishment, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Director General Population Welfare Department, Khyber Pakhtunkhwa, Peshawar with the request to circulate the said seniority list amongst all concerned.
3. PSO to Chief Secretary, Govt. of Khyber Pakhtunkhwa.
4. PS to Secretary, Govt. of KPK, PWD, Peshawar.
5. Master file.


SECTION OFFICER (ESTT)
Phone No. 091-9223623



GOVERNMENT OF KHYBER PAKHTUNKHWA,
POPULATION WELFARE DEPARTMENT
02nd Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

Dated Peshawar the 04th December, 2019

NOTIFICATION

No. SOE (PWD) 4-30/2019: In pursuance of Section 8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with rules 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, with approval of the competent authority, final seniority list of Assistant Directors / Tehsil Population Welfare Officers / DDPWOs (Non-Tech) / Deputy Demographers and Accounts Officer (BPS-17) Population Welfare Department Khyber Pakhtunkhwa as stood on 04/12/2019 is hereby notified / circulated for general information of all concerned:-

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting:	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
1	Mr. Saecdur Rehman, AD/DDPWO/TPWO	M.A (Pol. Sc)	10.05.1970	Shangla	13.06.2009 (adhoc basis)	-	13.06.2009	Initial	DPW Office, Shangla	As per decision of the Departmental Progress Review Committee taken in its meeting held on 15-11-2019, the inter-se seniority of adhoc employees has been revised and determined on the basis of continuous officiation in service (date of joining / arrival and age factor where applicable) as per contents of Section-4(2) of the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 and advices of the Law and Establishment Departments as

S. No.	Name of Officer	Qualification	Date of Birth	Domicile	Date of first entry into Govt. Service	Date of apptt: / Promotion in BPS-16	Regular appointment in present grade		Present place of posting.	Remarks
							Present grade (BPS-17)	Method of recruitment		
1	2	3	4	5	6	7	8	9	10	11
										well as judgment dated 12/03/2019 of the Khyber Pakhtunkhwa Services Tribunal in case of Mr. Zawar Hussain in Service Appeal No. 56/2018.
2	Mr. Samiullah Khan, AD/DDPWO/TPWO	M.A (Pol. Sc)	02.07.1979	Peshawar	13.06.2009 (ad hoc basis)	--	13.06.2009	Initial	DPW Office, Charsadda	-do-
3	Ms. Sidra Nisar, Dy. Demographer	M.Sc (Stats)	21.02.1985	Peshawar	13.06.2009 (ad hoc basis)	--	13.06.2009	Initial	DPW Office, Charsadda	-do-
4	Mr. Arafat Khan Afridi, AD/DDPWO/TPWO	M.A (Pol. Sc)	13.05.1977	Khyber Agency	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	Agency PW Officer	-do-
5	Mr. Sana Ullah, AD/DDPWO/TPWO	M.A (Pol. Sc)	15.09.1980	Charsadda	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW Office, Charsadda	-do-
6	Mr. Fazal Azeem, AD/DDPWO/TPWO	MBA	25.06.1983	Charsadda	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW office, Charsadda	-do-
7	Mr. Shahid Khan, AD/DDPWO/TPWO	M.A (Sociology)	10.04.1984	Malakand	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW Office, Malakand	-do-
8	Mr. Bilal Khan Afridi, AD/DDPWO/TPWO	MBA	15.10.1986	Khyber Agency	15.06.2009 (ad hoc basis)	--	15.06.2009	Initial	DPW Office, Kohistan	-do-
9	Mr. Amjad Ali Khan, AD/DDPWO/TPWO	MBA	15.09.1976	Peshawar	16.06.2009 (ad hoc basis)	--	16.06.2009	Initial	DPW Office, Mardan	-do-
10	Mr. Muhammad Tariq Khan, AD/DDPWO/TPWO	M.A (Anthropology)	28.02.1975	Nowshera	17.06.2009 (ad hoc basis)	--	17.06.2009	Initial	DPW Office, Nowshera	-do-
11	Mr. Khurshid Ali, AD/DDPWO/TPWO	M.P.A.	01.02.1976	Chitral	17.06.2009 (ad hoc basis)	--	17.06.2009	Initial	DPW Office, Chitral	-do-
12	Mr. Asghar Khan, AD/DDPWO/TPWO	M.A (History)	05.02.1980	Mardan	17.06.2009 (ad hoc basis)	--	17.06.2009	Initial	DPW Office, Dir (Upper)	-do-
13	Mr. Iftikhar Ahmad, Deputy Demographer	M.Sc (Stats)	20.3.1976	Peshawar	18.06.2009 (ad hoc basis)	--	18.06.2009	Initial	DPW Office, Karak	-do-
14	Mr. Asif Mehmood, AD/DDPWO/TPWO	M.Sc (Chemistry)	20.04.1977	Karak	18.06.2009 (ad hoc basis)	--	18.06.2009	Initial	TPWO DPW Office, Karak	-do-
15	Mr. Ayat Ullah, Dy. Demographer	MSc. (Stats.)	20.09.1975	Nowshera	19.06.2009 (ad hoc basis)	--	19.06.2009	Initial	DPW Office, Swabi	-do-
16	Ms. Ruby Hashim, AD/DDPWO/TPWO	M.A (Anthropology)	28.11.1981	Mohmand Agency	20.06.2009 (ad hoc basis)	--	20.06.2009	Initial	DG, PW Office, Peshawar	-do-