

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 888/2022

Muhammad Ibrahim

APPELLANT

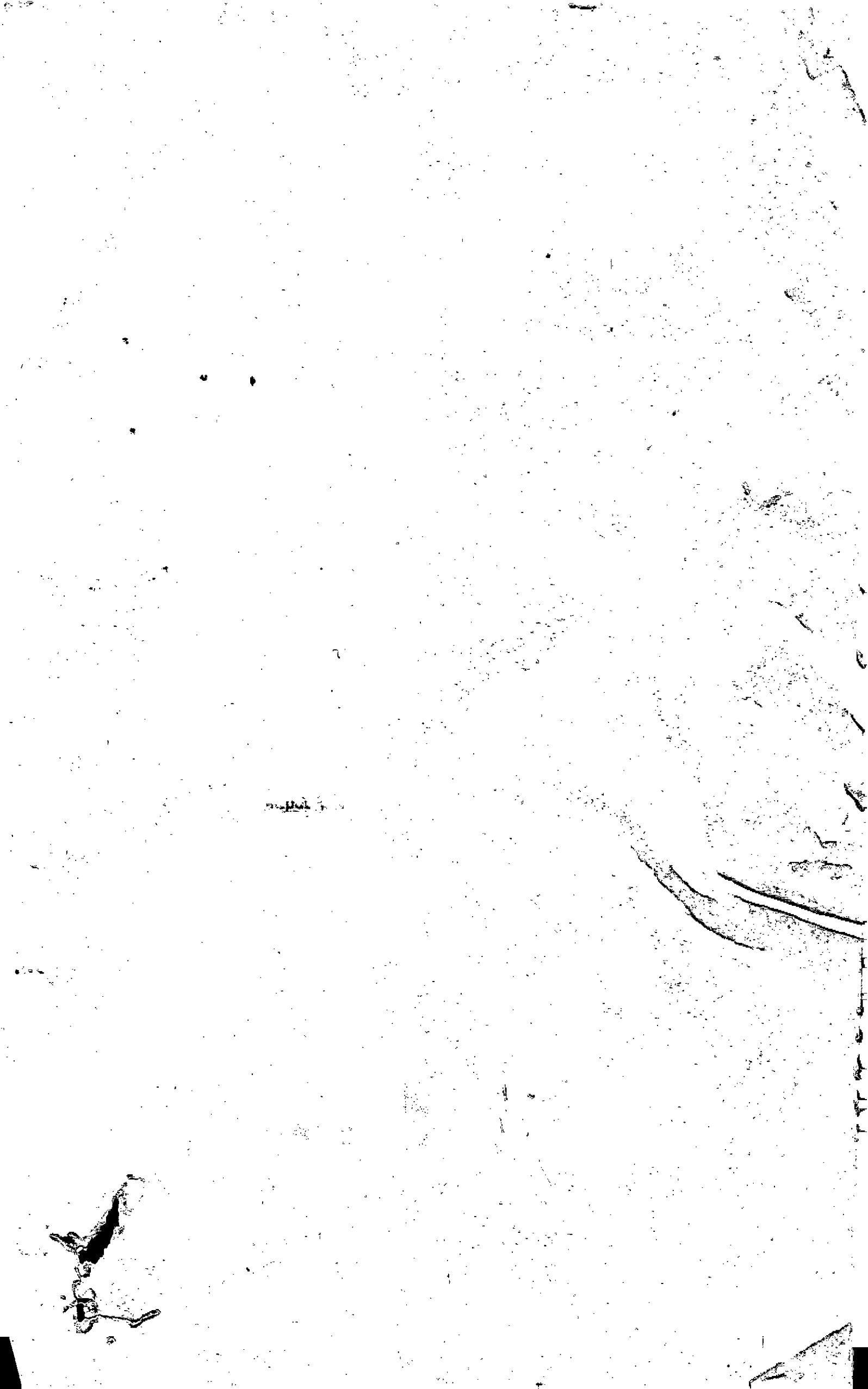
Versus

Govt of KPK and Others

RESPONDENTS

S. No	Description	Annexure	Pages
1	Comments		1-2
2	Affidavit		3
3	<del>Application for Remission of Cost</del>		4
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5	Seniority list	B	11-17
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24/02/2025  
Deponent



(1)

**Before The Khyber Pakhtunkhwa Service Tribunal Peshawar**

Service Appeal No. 886/2022

Muhammad Ibrahim.....Appellant

VS

Govt. of KPK through Secretary E&SE Education Deptt. And others .....Respondents

Joint Para wise Comments/ Reply on behalf of Respondents 1-3.

Respectfully sheweth:

**Preliminary objection on service appeal:**

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the appeal of the appellant is not maintainable in its present form.
3. The appeal of the appellant is also bad for miss-joinder and non-joinder of the necessary parties.
4. That the appellant has become ineligible as he has failed in the typing test conducted by Respondent No.2 for promotion from class-iv to junior clerk (typing test ANNEX-A).
5. That the appellant is low in merit position in seniority list of class-iv employees for promotion to junior clerk updated up-to 31/12/2020(Seniority List ANNEX-B ).
6. That the appellant has failed the typing test conducted by Respondent No.2 for promotion to junior clerk.
7. That the appeal of the appellant is badly time barred.
8. That the same subject matter issue has been resolved in writ petition no 1127-D/2017, and 702-D/2017 by PHC DI Khan bench(Judgment ANNEX-C).
9. That in typing test a speed of 30 words per minute is mandatory as per the policy amended dated 18-Jul-2019 (Policy ANNEX -D).

**FACTS:**

1. Para No.1 of the appeal pertains to the appellant .
2. Para No.2 pertains to the records and personal qualification of the appellant.
3. Para No. 3 is incorrect. 20% promotion policy from daftri to junior clerk is not existed in the Respondents department as the policy already annexed A is self-explanatory.

(2)

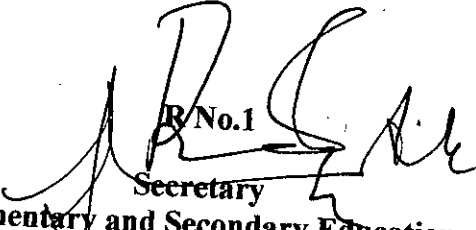
5. Para No. 5 incorrect. That the Respondent department has made promotion on 14-03-2020 after due process of law in which the appellant has become ineligible as he has failed in the typing test. After that the Respondent department has not made the promotion from class-iv to junior clerk.
6. Para No. 6 pertains to judicial file of PHC Bannu Bench.
7. Para No.7 is incorrect and not admitted.

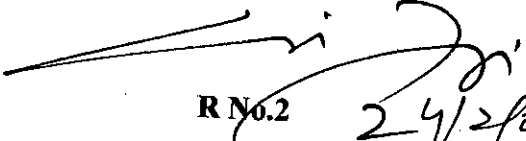
**GROUNDS:**

- A. This Para pertains to fundamental rights of appellant.
- B. Incorrect, the Respondent department has considered the appellant for promotion as per law and rules. In which the appellant has failed in the typing test for the subject post.
- C. Incorrect, the appellant has been dealt according to the law and rules.
- D. Incorrect, as stated above.
- E. Incorrect. The appellant has been dealt according to the law and rules.
- F. Incorrect. That appellant has become ineligible as he has failed in the typing test.
- G. That the Respondent may be allowed to raise additional grounds at the time of arguments.

**PRAYER:**

It is, therefore, most humbly prayed that on acceptance of these joint Para wise Reply/Comments in response to the appeal filed by the appellant, the appeal in hand may very graciously be dismissed with cost.

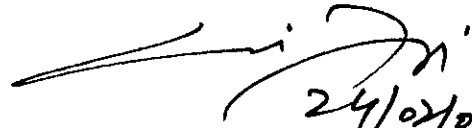
  
R No.1  
Secretary  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

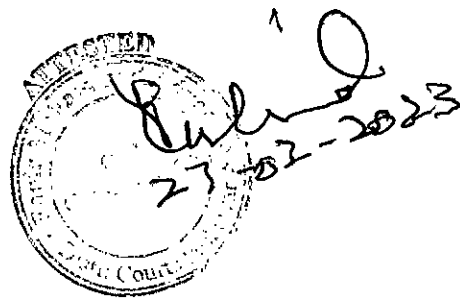
  
R No.2 24/2/2023  
District Education Office  
(Male) Bannu

AFFIDAVIT

3

I Mr. Saif Ullah Khan District Education Officer (Male) Bannu do hereby affirm and declare on oath that the contents of the para wise reply to the service appeal No. 886/2022 Titled Muhammad Ibrahim VS Govt: of KPK are true to the best of my knowledge and belief and nothing has been concealed from this honorable tribunal.

  
24/02/2023  
DEPONENT

  
23-02-2023

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BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PERSHAWAR

Service Appeal No \_\_\_\_\_/2022

**Muhammad Ibrahim .....Appellant**

**Versus**

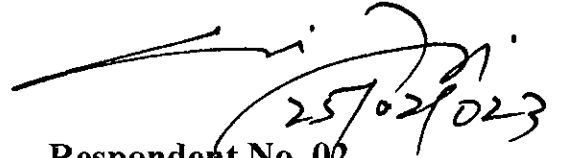
**Government of KPK & Other**

**Remission of payment of cost**

**Respectfully Sheweth:-**

1. That the above titled service appeal is pending in this honorable tribunal for submission of reply which is fixed on 02.03.2023.
2. That the respondent Department has not been served upon notices accompanying the appeal grounds till date.
3. That this honorable tribunal has imposed a total cost of payment of Rs. 3000/-+3000/- = 6000/-.

Therefore, it is prayed that on acceptance of this application the imposed cost may be waived off.

  
25/02/2023  
**Respondent No. 02  
DEO (Male) Bannu**

(13)

69	NASIR ULLAH KHAN	GPS Ali mai khatakan	Chowkidar	2	09-12-89	20-02-16	FA	08-10-07
70	Qaiser Ali Khan	GPS BAKERAY BHARAT	CHOWKIDAR	2	13-03-89	24-02-16	FA	18-10-07
71	Rakif Ullah	GPS BULAND BAIST KHEL	CHOWKIDAR	2	02-03-79	25-02-16	FA	22-03-00
72	Rifat Ullah Khan	GPS Koli sadat No 2	Chowkidar	2	29-03-95	25-02-16	FA	06-12-14
73	Siraj Khan	GPS Seru Bada Khel	CHOWKIDAR	2	30-08-92	27-02-16	FA	08-10-07
74	Aurangzeb Khan	GPS Farq Ismail Khani	CHOWKIDAR	2	20-04-76	05-03-16	FA	26-05-96
75	Sanaullah Khan	GMS Jahangi Lalozai Bannu	Sweeper	2	15-05-90	10-03-16	FA	09-09-13
76	MUJEEB REHMAN	GMS Muhammad Khan Kakki Bannu	W/OASID	2	07-04-91	30-05-16	FA	26-07-09
77	Shah Riaz Khan	GPS ZEBA KHEL KHOJARY NO.1	Chowkidar	2	12-05-93	04-06-16	FA	2012
78	Wahidullah	GPS Rushan Dad Kachkol	Chowkidar	2	04-10-94	04-06-16	FA	06-08-13
79	Nematullah Shah	GPS Degan shsh jafal	Chowkidar	2	15-04-86	06-10-16	FA	2014
80	GHWSULLAH JAN	GPS Koli sadat No 1	Chowkidar	2	01-03-84	31-10-16	FA	26-06-05
81	MUHAMMAD IBRAR KHAN	GPS RAOIB BHARAT	Chowkidar	2	25-10-90	31-10-16	FA	16-04-12
82	Noor Afzal Khan	GPS HASSAN KHEL KHAIRAKI	Chowkidar	2	05-10-89	16-02-17	FA	12-01-10
83	Safid Khan	GPS Pak ismail khel	Chowkidar	2	15-08-91	25-05-17	FA	11-05-11
84	IMDAD ULLAH KHAN	GPS Mosa khel baram	Chowkidar	2	25-03-92	06-04-17	FA	07-06-17
85	ALAM ZEB KHAN	GPS NAR SHERMAST	Chowkidar	2	05-03-91	25-10-13	FA	11-07-17
86	Taza Khan	GPS NAWAB KHAN DARDARIZ	Chowkidar	2	02-01-91	08-08-17	FA	14-12-11
87	IZAZ-ULLAH KHAN	GHS Sizap Khel Bannu	Chowkidar	2	25-03-96	08-08-17	FA	04-03-17
88	Rahman Ullah Khan	GPS MASTER LEWAN DRADARIZ	Chowkidar	2	06-12-87	03-01-11	FA	20-12-17
89	Muhammad Ibrahim	GPS Bebar Issaki	CHOWKIDAR	2	04-05-88	22-12-17	FA	27-05-06
90	ZIA UL ISLAM	GHS HAKIM HAVED Bannu	W/O	2	10-03-85	28-12-17	FA	12-08-05
91	Shanfullah	GPS KHUJARY KHASS	Chowkidar	2	30-03-90	28-12-17	FA	26-07-09
92	UMER SARFARAZ KHAN	GHS Ismail Mama Khel Bannu	Sweeper	2	15-05-97	28-12-17	FA	22-12-17
93	Kashif Khan	GPS FAIZ TALAB ABBAS NO 1	CHOWKIDAR	2	25-01-87	11-10-07	FA	01-01-16
94	Amir Ullah Khan	GPS Jameel Khan Nurar	Chowkidar	2	06-07-77	12-07-12	FA	13-07-16
95	IHSAN ULLAH	GHS No.2 Bannu	Chowkidar	2	02-04-92	28-12-17	FA	02-08-16
96	MUHAMMAD BILAL	GPS NO-2 GHORIWALA	Chowkidar	2	10-04-92	18-01-19	FA	01-01-18
97	WEQAR KHAN	GPS GUL BAZ KHAN MANDAN	CHOWKIDAR	2	15-03-84	04-03-01	FA	19-02-19
98	Ikrnullah	GPS LAR KILLA SELANI	Chowkidar	2	30/03/1995	14-10-17	FA	30-07-19
99	Abdullah Khan	GPS Fatmakhel	Chowkidar	2	02-04-99	22-02-17	FA	30-07-19
100	Abid Ullah Khan	GPS NO 2 BANNU	CHOWKIDAR	2	27-03-87	21-11-15	FA	13-09-15
101	Abid Ullah Khan	GHS Ganji Deud Shah Bannu	CHOWKIDAR	2	06-01-86	09-02-19	FA	23-05-18
		GHS Kingor Jan Bahader Bannu	CHOWKIDAR	2	20-01-75	08-07-18	FA	1995
			CHOWKIDAR	2	14-03-98	22-07-19	DAE	2013

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LAB ATT

102	Sharif Ullah Khan	GHS Ismaili Mama Khel Bannu	Sweeper	2	14-07-87	01-04-08	FA	2018
103	Altab Ali Khan	GHS Sham Shai Khel Bannu	N/Oasid	2	07-04-95	05-06-16	FA	2018
104	Nafid Ullah Khan	GHS Sham Shai Khel Bannu	Lab. Attend	2	12-12-83	15-11-06	FA	2016
105	HAMEED KHAN	GPS NAWAB KHAN MAMASH KHEL	CHOWKIDAR	2	12-03-88	30-08-09	FA	2016
106	SHAH FAISAL	GPS CHE GARHI MAMASH KHEL	CHOWKIDAR	2	15-02-92	25-10-13	FA	2016
107	REHMAN ULLAH KHAN	GHSS DILASA KHAN MANDEW BANNU	CHOWKIDAR	2	07-06-95	02-09-14	FA	2016
108	IBRAR KHAN	GHS KHAN ZAMAN NURAR BANNU	SWEEPER	2	01-02-86	01-01-09	FA	2015
109	Zahid Ullah Khan	GMS Sakhi Sarwar Mandew Bannu	N/Oasid	2	27-04-89	03-12-09	FA	2015
110	MUHAMMAD AFAO KHAN	GPS AMANDI SHEIKH AMIR	CHOWKIDAR	2	30-03-97	25-02-16	FA	2015
111	Abid Rahman	GPS Hindi Khel Bannu	N/Oasid	2	10-01-81	27-03-17	FA	2015
112	Syed Noor Jahan Shah	GMS Shahdew Bannu	N/Oasid	2	05-02-95	14-10-17	FA	2015
113	SULAIMAN KHAN	GHS KAKKI BANNU	CHOWKIDAR	2	25-03-95	14-10-17	DAE	2014
114	SUFYAN SAMEEN	GHS MANDAN BANNU	NAIB QASID	2	25-01-94	22-11-13	FA	2013
115	NASIR KHAN	GHS KAKKI BANNU	NAIB QASID	2	20-03-95	05-06-15	FA	2013
116	Nasir Khan	GMS Asad Khujari Bannu	N/Oasid	2	05-05-94	04-06-16	DAE	2013
117	WAQAS Khan	GHS S.K.Bala Bannu	CHOWKIDAR	2	29-03-96	25-05-17	FA	2013
118	Zakir Ullah Khan	GHSS Lalozai Bannu	Lab Attendent	2	04-05-94	23-01-14	FA	2012
119	FARHAD KHAN	GHS KAKKI BANNU	CHOWKIDAR	2	13-04-84	03-10-06	FA	2011
120	Umar Ayaz Khan	GPS Sakhi Sarwar Mandew	Chowkidar	2	20-11-77	21-06-07	FA	2011
121	Hadayat Ullah	GHS Mira Khel Bannu	CHOWKIDAR	2	28-02-92	04-06-16	FA	2011
122	Adnan Khan	GMS Bazida Yousif Khan Bannu	CHOWKIDAR	2	07-09-88	04-2016	FA	2010
123	AURANG ZEB KHAN	GMS JAHANGIR LALOZAI BANNU	SWEEPER	2	07-04-91	30-05-16	FA	2009
124	Muhammad Ismail Khan	GHS Bazai Ahmad Khan Bannu	Sweeper	2	07-05-87	13-03-15	FA	2007
125	Allaullah Khan	GHSS NURAR BANNU	N/Oasid	2	14-02-79	11-11-09	FA	2005
126	Waheed Ullah Khan	GHSS Mamash Khel Bannu	CHOWKIDAR	2	07-11-84	15-06-05	FA	2004
127	Shadman Khao	GHS Seru Bada Khel Bannu	N/Oasid	2	01-11-78	15-01-12	FA	2004
128	HAMEED ULLAH KHAN	GHS KAKKI BANNU	WATER CARRIER	2	01-04-78	24-01-14	FA	2001
129	Iltikhar Khan	GMS Jhando Khel Bannu	Sweeper	2	01-01-82	12-09-05	FA	2016
130	Irfan Ullah Khan	GMS Bazida Yousif Khan Bannu	N/Oasid	2	01-11-85	?	D.cm	2003
131	Hadayat Ullah	GHS Ismaili Mama Khel Bannu	Lab Attendent	2	02-05-85	22-11-15	FA	2015
132	Imranullah Khan	GHSS Mamash Khel Bannu	Lab Attendent	2	?	?	BA	?
133	Asghar Ali Khan	GHS Nar Jaffar Bannu	N/Oasid	2	?	?	FA	?
134	Zahoor Anwar	GHS Asad Khujari Bannu	N/Oasid	2	?	?	BA/DIT	?
135	Muhammad Saad	GPS Pir Fida Jhando Khel Bannu	Lab Attand	2	?	?	BA	?
136	MOHIB ULLAH KHAN	GHSS Shahbaz Azmat Khel Bannu	Lab Attand	2	?	?	FA	?

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138	ZIA ULLAH	GPS SHUKURULLAH BERI KHEL	CHOWKIDAR	2	01-01-72	16-09-05	?	?
	Muhammad Younas Khan	GPS GULAN KILLA	CHOWKIDAR	2	08-04-84	09-03-06	FA	?
139	FIDA UR REHMAN	GPS No.2 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	02-03-73	09-03-06	?	?
140	Shah Riaz	GPS AMANDI SHAH JAHAN	CHOWKIDAR	2		03-05-06	FA	?
141	ZAFAR IQBAL	GPS KOTKA JUMA KHAN	CHOWKIDAR	2	06-09-82	09-09-06	?	?
142	IHSAN ULLAH KHAN	GPS MIR HASSAN	CHOWKIDAR	2	22-02-81	05-10-06	?	?
143	Sharafat Khan	GPS NUSRAH SHAL KHEL	CHOWKIDAR	2	01-10-88	14-10-06	?	?
144	ABDUL JABBAR	GPS NO.1 BAZAR AHMAD KHAN	CHOWKIDAR	2	01-01-62	11-11-06	?	?
145	KHAIR ULLAH	GHSS JANI KHEL MALI KHEL BANNU	CHOWKIDAR	2		16-12-05		?
146	MUHAMMAD NISAR KHAN	GPS LANDI KILLA	CHOWKIDAR	2	05-04-83	08-01-07	?	?
147	ASHRAF KHAN	GPS MAMABATI BARAKZAI	CHOWKIDAR	2	18-12-71	03-09-07	?	?
148	ANAR JAN	GPS GATI KILLA BARAKZAI	CHOWKIDAR	2	01-07-80	22-09-07	?	?
149	BAKHT NAWAZ KHAN	GPS UMAR GULA WALIGAI	CHOWKIDAR	2	02-12-75	06-10-07	?	?
150	ARSHAD	GPS ZONDA GHAIBI	CHOWKIDAR	2	01-07-74	24-10-07	?	?
151	RAB NAWAZ	GPS KARAB KILLA	CHOWKIDAR	2	07-04-88	08-01-08	FA	?
152	ZAHID ULLAH	GPS GULA NOOR BARAKZAI	CHOWKIDAR	2	?	23-03-08	?	?
153	Hidayat Ullah Khan	GPS KOTKA AZAD KHAN	CHOWKIDAR	2	05-02-81	12-05-08	FA	?
154	AZIZ ULLAH KHAN	GPS Muhammad Khan Gambar	CHOWKIDAR	2	14-01-71	07-06-08	?	?
155	Shah Farias Khan	GPS UMER GUL PATOL KHEL	CHOWKIDAR	2	10-01-82	15-08-08	?	?
156	Mishqat Ullah	GPS Haji Daraz Khan	Chowkidar	2	25-03-90	04-01-09	FA	?
157	ABDUL SAMAD	GPS EMAL KHEL ESAKI	CHOWKIDAR	2	01-01-83	01-03-09	?	?
158	ABDUL AZIZ	GPS WALIZAR KILLA	CHOWKIDAR	2	15-01-88	14-03-09	?	?
159	UMAR RIAZ	GPS MIR ALAM CHASHMAI	CHOWKIDAR	2	01-01-91	13-07-09	?	?
160	MUHAMMAD IBRAHIM SHAH	GPS YAQOOB KHAN DHANUJ	CHOWKIDAR	2	12-09-72	14-01-10	?	?
161	Rahman Gul	GPS ZAHIR SHAH AKHUNDAN	CHOWKIDAR	2	02-05-85	23-06-10	?	?
162	NISAR KHAN	GPS No.1 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	01-01-70	23-06-10	?	?
163	MOIN ULLAH	GPS WAZIRULLAH	CHOWKIDAR	2	10-01-83	01-07-10	?	?
164	Alla ur Rehman	GPS MOINULLAH LANDI JALANDER	CHOWKIDAR	2	01-01-72	24-12-10	?	?
165	Mehmood Khan	GPS SOKARI KARIM Khan	CHOWKIDAR	2	01-07-81	11-01-11	?	?
166	RAHIM ULLAH	GPS HASSAN KHEL ISAKI	CHOWKIDAR	2	01-06-70	02-02-11	?	?
167	Habib Nawaz Khan	GPS KOTKA BILAWAR KHAN	CHOWKIDAR	2	03-02-80	08-02-11	?	?
168	Shadman Nawaz	GHSS Comp: Bannu	Chowkidar	2	25-08-89	01-03-11	FA	?
169	IHSAN ULLAH	GHSS Comp: Bannu	Mali	2	02-03-93	01-06-11	FA	?
170	SAFI ULLAH	GPS SALIM KHAN GADI TOP	CHOWKIDAR	2	01-07-86	11-06-11	?	?

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	Airfan Khan.	GMS HASSAN KHEL KHERAKI	NAIB QASID	2	06-10-91	11-06-11	FA	?
172	ZARBAT KHAN	GMS No.1 Bannu City	N/Q	2	12-01-11	23-07-11	FA	?
173	Muhammd Gul	GPS TAZA KHAN	CHOWKIDAR	2	01-01-77	17-10-11	?	?
174	Javed Khan	GPS NO 7 BANNU	CHOWKIDAR	2	01-01-86	22-11-11	?	?
175	Wasim Daraz	GPS AZMAT KALA	CHOWKIDAR	2	20-05-80	01-01-12	?	?
176	MUHAMMAD SHOJAB	GPS NO 9 BANNU	CHOWKIDAR	2	10-01-92	10-01-12	?	?
177	Abdul Hubab	GPS ALIM SHAH	CHOWKIDAR	2	22-03-94	09-02-12	?	?
178	Kemran Khan	GHSS Jani Khel Bannu	L/Al	3	?	23-04-12	?	?
179	UMAR GUL KHAN	GPS NO 3 BANNU	CHOWKIDAR	2	01-07-80	13-07-12	?	?
180	AZIM KHAN	GPS PURANA DAUD SHAH	CHOWKIDAR	2	?	08-10-12	?	?
181	Ghayur Khan	GPS KHODI KHEL DABAK	CHOWKIDAR	2	10-10-75	09-10-12	FA	?
182	ABDUL SHAKOOR	GPS KARIM KHAN BAIST KHEL	CHOWKIDAR	2	01-02-90	10-10-12	?	?
183	AMIN ULLAH	GPS EACHAKI JANI KHEL	CHOWKIDAR	2	10-08-84	25-10-13	FA	?
184	Asif Khan	GPS SAID NAWAZ TARKHOBA	CHOWKIDAR	2	27-04-87	25-10-13	?	?
185	RASHID ULLAH	GPS CHAREEB ABAD	CHOWKIDAR	2	15-09-95	25-10-13	?	?
186	ANWAR JAMAL KHAN	GPS NUSRAT DAUD SHAH	CHOWKIDAR	2	1984	25-10-13	?	?
187	NEK MAAN ULLAH	GHS AJMAL BARLASHTI DAUD SHAH BANNU	?	2	20-08-89	25-10-13	FA	?
188	FARMAN ULLAH	GPS DHANDI WAZIR	CHOWKIDAR	2	22-03-84	26-10-13	FA	?
189	MURTAZA KHAN	GPS GUL PAYO	CHOWKIDAR	2	07-04-92	29-10-13	FA	?
190	Shah Zeb Nawaz	GPS EAHADER ZAMAN SARDI KHEL	CHOWKIDAR	2	12-03-89	25-11-13	FA	?
191	SHAHZEB NAWAZ	GHSS Comp: Bannu	Chowkidar	2	04-09-95	01-01-14	FA	?
192	MIDASIR NOOR	GHSS (COMP:) NAZIM NASIB NAWAZ ISSAKI SHA	CHOWKIDAR	2	04-09-95	01-01-14	FA	?
193	NAZIF ULLAH	GPS WAZIR ABAD MARGHALI	CHOWKIDAR	2	02-03-89	24-01-14	?	?
194	RAFI ULLAH	GPS HAN ULLAH BAIK KHEL	CHOWKIDAR	2	09-01-85	27-05-14	FA	?
195	NAHEED ULLAH	GPS ALAM DIN	CHOWKIDAR	2	12-12-94	27-05-14	?	?
196	Shamroz Khan	GPS KAMAR KILLA	CHOWKIDAR	2	22-04-87	11-08-14	?	?
197	Zohaib Khan	GPS GARAY KALA	CHOWKIDAR	2	1984	18-08-14	?	?
198	UMER SHAH	GPS No.5 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	02-02-94	23-08-14	?	?
199	Sajid Ali Shah	GPS WEDAN KILLA	CHOWKIDAR	2	01-06-89	01-09-14	?	?
200	ABDUL HAMID KHAN	GPS MASTER ESAKI	CHOWKIDAR	2	04-05-96	13-09-14	?	?
201	IRFAN ULLAH	GPS MUHAMMAD KHALIL MANDAN	CHOWKIDAR	2	15/11/1975	09-10-14	FA	?
202	MUHAMMAD RAHMAN	GPS KOTKA SHANAWAZ	CHOWKIDAR	2	22-06-79	29-11-14	FA	?
203	ZIA UR REHMAN	GPS GUL IMAM	CHOWKIDAR	2	05-03-74	03-12-14	FA	?
204	FIDA ULLAH	GPS FIDULLAH KHAN WALI NOOR JANI KHEL	CHOWKIDAR	2	02-01-91	12-03-15	FA	?
205	TAHIR ULLAH	GPS MIRDARAZ SARKI KHEL	CHOWKIDAR	2	01-03-96	12-03-15	?	?

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(17)

	IMRAN KHAN	GPS AQLIM KHAN KILLA	CHOWKIDAR	2	05-09-92	15-02-17	FA	?
	ASLAM FARID KHAN	GPS GUL JAWAR	CHOWKIDAR	2	15-02-86	15-02-17	?	?
225	ZEESHAN	SDEO MALE DOMEL	Naib Qasid	2	20-02-82	28-02-17	FA	?
226	SOHAIL KHAN	GPS DOGAR UMERZAI	CHOWKIDAR	2	26-03-96	17-05-17	?	?
227	Shahid Khan	GPS LABHA KHEL DAUD SHAH	CHOWKIDAR	2	01-01-99	17-05-17	?	?
228	Riaz Khan	GPS Waf Zaman Nurar	Chowkidar	2	20-11-97	25-05-17	FA	?
229	MUHAMMAD ASIF	GPS KALA KHEL MASTI KHAN	CHOWKIDAR	2	01-01-89	25-05-17	?	?
230	Haleem Rehman	GPS SHER GHULAM SHERI KHEL	CHOWKIDAR	2	29-03-90	13-07-17	?	?
231	GUL WALI KHAN	GPS AYUB REHMAN	CHOWKIDAR	2	12-01-76	27-07-17	?	?
232	MEHRAN KHAN	GPS LAKKI QAMAR DIN	CHOWKIDAR	2	01-01-82	08-08-17	?	?
233	Haroon Shehzad	GPS MAMASH KHEL KHAS	CHOWKIDAR	2	07-12-86	22-12-17	FA	?
234	Muhammad Yasin Khan	GPS NO 1 BANNU	CHOWKIDAR	2	01-04-96	22-12-17	?	?
235	SAMIMULLAH KHAN	GPS No 7 SHAHBAZ AZMAT KHEL	CHOWKIDAR	2	04-08-99	22-12-17	?	?
236	WALIJAZ	GPS BAIND KHEL KAKKI	Chowkidar	2	01-07-90	23-12-17	FA	?
237	M. RIAZ KHAN	GPS GADI TOP	CHOWKIDAR	2	02-06-01	22-07-19	?	?
238	Muhammad Masood	GHS SIKANDER BHARAT BANNU	NAIB QASID	2	13-07-12	?	FA	R.A.Date
239	ADNAN KHAN	GHSS Shabaz Azmat Khel Bannu	Lab Attendant	2	15-03-74	01-02-11	DAE	
240	KHALID REHMAN	GPS MUSA KHEL VOLIGAI	CHOWKIDAR	2	10-07-83	27-03-04	FA	?

District Education Officer  
(Male) Bannu

17

*Signature*

(18)

**JUDGMENT SHEET**  
**IN THE PESHAWAR HIGH COURT, D.I.KHAN BENCH**  
(Judicial Department)

W.P No. 1127-D/2017

**Farman Ullah**  
**Vs**  
**Government of Khyber Pakhtunkhwa through**  
**Chief Secretary, Peshawar and 04 others**

For petitioner      Muhammad Sajid Awan, Advocate  
For respondents    Mr. Kamran Hayat Miankhel Addl.  
                                 Advocate General  
                                 Mr. Umar Farooq Bhattani, Advocate  
Date of hearing     25.01.2021

**JUDGMENT**

Sahibzada Asadullah, J.- Through this single judgment, we intend to decide the following cases, having identical facts and law points involved therein.

1. W.P No. 1127-D/2017  
[Farmanullah  
Vs  
Govt. of Khyber Pakhtunkhwa and others]
2. W.P No. 702-D/2017  
[Sharifullah  
Vs  
Govt. of Khyber Pakhtunkhwa and others]

2. By virtue of these petitions filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, it is averred that the petitioners seek the directions to award promotion to the petitioners on the post of Junior Clerk in preference to Mr. Amir

Muhammad son of Yar Muhammad/respondent No. 5 and thereby by restoring the seniority of the petitioners, the promotion of respondent No. 5 may be recalled. They have further prayed that the petitioners have been deprived of promotion on the basis of fitness, therefore, the fitness criteria, as determined by official respondents is highly unjust, illegal and the policy in vogue of the Provincial Government, hence, this constitutional petition.

3. On direction of Court order, the comments were called from the respondents, which were submitted accordingly, wherein they submitted that the competent authority/Department had fulfilled all the codal formalities according to Rules and policy in vogue in the process of promotion for the post of Junior Clerk.

4. Heard. Record perused.

5. In this case facts admitted on the record reveal that there are 33% share of class-IV employees for the purpose of promotion to the post of Junior Clerk as per the recruitment policy of the provincial government. In every provincial department, the posts of Junior clerk are to be filled through 67% direct recruitment on the basis of open merits, whereas 33% posts are to be filled by way of promotion from amongst the holders of the posts of Naib Qasid, Chowkidar, etc on the basis of Seniority-cum-fitness. For the purpose of such promotion to the post of Junior Clerk, the Naib Qasid, Chowkidar etc must possess Matric Qualifications. Record further suggestive that total number of four posts of Junior Clerk were laying vacant in the office of District Education Officer

(Female), Education Department, Tank and out of said posts 33% quota was reserved for the class-IV who possess minimum matric qualification. To this effect, the respondent No.4 issued an advertisement wherein applications have been invited from the class-IV for promotion against 33% quota to the post of Junior Clerk. The petitioners having higher education as well as seniority applied for the post of Junior Clerk on the basis of 33% share of Class-IV, ultimately, the petitioners were dropped from promotion to the post of Junior Clerk and respondent No. 5 was promoted on the basis of fitness.

6. The moot issue which requires consideration and determination before this Court is that whether the fitness criteria, as determined by the official respondents with regard to promotion for the post of Junior Clerk is highly unjust and against the policy in vogue of the Provincial Government?. Before answering to this question, it will be essential to highlight that '*Eligibility for promotion*' and '*determination of fitness*' are two different criteria. Eligibility primarily relates to the terms and conditions of service and their applicability to the civil servants whereas question of fitness is a subjective evaluation on the basis of objective criteria. Section 9(1) of the Civil Servants Act 1973 provides that civil servant has a right to be considered for promotion if eligible on account of possessing the prescribed minimum qualification etc. A civil servant however has no vested right to be promoted. Section 4 of the Service Tribunals Act 1973 contemplates that any civil servant who is aggrieved with respect to the terms and

condition of the service has right to file appeal before appropriate tribunal established for such purposes within prescribed period. On the other hand in the matters relating to determination of fitness of a civil servant to be promoted to a higher post, the law does not provide any remedy of appeal or representation in view of section 22 of the Act of 1973. Petitioners in this case therefore have no right to appeal or representation against the impugned recommendations of Department/respondents for promotion of the post of Junior Clerk. In view of the specific bar contained in clause (b) of proviso to section 4(1) of Service Tribunals Act 1973 the petitioners lacking adequate efficacious remedy therefore has a right to seek the constitutional remedy. This petition therefore is not violative to the mandate of Article 199 and 212 of the Constitution of Islamic Republic of Pakistan 1973. Reliance be made upon *Miss Zubaida Khatoon Vs. Mrs. Tehmina Sajid Sheikh and others (2011 PLC (C.S.) 596) (Supreme Court of Pakistan)*.

7. In legal sphere, seniority-cum-fitness means that *due and equal regard should be paid both to seniority and to fitness, and, since fitness is a matter of degree, it would appear that a senior person can be overlooked in favour of a junior who is demonstrably more fit for the appointment that he is*. Thus, the provision for promotion on the basis of seniority-cum-fitness permits the respondents/Department to select a junior, who is demonstrably more fit than the senior. In other words, the rule of comparative assessment was applied. The principle of seniority-cum-merit or seniority-cum-fitness visualises

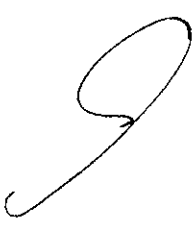
only rejection of the unfit. There is certainly difference where the promotion is based on the pure seniority and promotion based on seniority-cum-fitness. Likewise, in cases of promotion based on seniority cum-fitness apart from pure seniority, the person's fitness, to hold the post to which he may be promoted, his physical fitness, *his acquirement of qualifications prescribed for the promoted post* or such other positive factors from which it would be obvious that he is unfit for promotion would have to be taken into account.

8. Shorn-of unnecessary detailed to the merits of the case, it is beneficial to refer the method of recruitment, qualifications and other conditions specified in column 3 to 5 which shall be applicable to pots of Junior Clerk in the Khyber Pakhtunkhwa Civil Secretariat as infra:

Junior Clerk	(i) Matriculation with second division or equivalent qualification from a recognized Board and (ii) A speed of 30 words per minute in typing.	18 to 30 years	a) Thirty-three percent by promotion on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years' service as such, who have passed SSC examination; and b) Sixty-seven percent by initial requirement.
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From the bird's eye view of above tabulated criteria for the post of Junior Clerk, it is visible that minimum qualification for appointment or promotion to the post of Junior Clerk, a speed of 30 words per minute in typing is essential and sine qua non. Admittedly the petitioners have desperately failed in the typing test which is necessary requirement for promotion as Junior Clerk, therefore, the petitioners are not eligible according to the Rules and policy as they have failed in typing test.



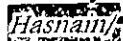
9. Plea of malice or discrimination raised by the petitioners qua their deferment is not substantiated through any speck of material. We do not find any jurisdictional error, legal infirmity or material irregularity in the impugned recommendations made by the Departmental Promotion Committee, therefore, the same do not call for any interference by this Court in exercise of constitutional jurisdiction.

10. Adherence to the statutory rules and procedures for selection of public jobs is the only surest method to objectively select the best out of the best from a competing lot; it is rooted into the fundamentals of equal opportunity, equal treatment and equal protections; any deviation therefrom would rock the bottom of the Republic, resting upon equiponderance. State authority in every sphere of life is a sacred trust to be exercised fairly and justly by the functionaries to accomplish the purposes assigned to them by law; it is their bounden duty to do right to the all manner of people, without any distinction. On the basis of said analogy, the respondents/Department have rightly denied the petitioners from

the promotion being failed candidates in typing test which is sine qua non for the post of Junior Clerk.

11. Even otherwise, there is no vested right accrued to the petitioners in case of promotion. Promotion against the non-selection post shall be made on the basis of seniority-cum-fitness and a civil servant cannot claim or ask for a promotion as a matter of right, as it is within the exclusive domain of the competent authority or departmental selection committee. Neither the promotion can take place automatically, nor the seniority alone is the deciding factor, as number of factors constitute fitness for promotion. Thus, the fitness criteria, as determined by the respondents/Department is just and in accordance with Policy in vogue by the provincial government and depriving the petitioners from award of promotion to the post of Junior Clerk on the basis of fitness is on compact ground, needs no interference to invoke the constitutional jurisdiction of this Court.

12. For the reasons *supra*, the instant writ petition as well as connected W.P No. 702-D/2017 are dismissed accordingly.

Announced  
January 25, 2021  
  
Hasnain



JUDGE



JUDGE

(D.B)

Hon'ble Mr. Justice Abdul Shakoor  
Hon'ble Mr. Justice Sahibzada Asadullah



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(ESTABLISHMENT WING)

Dated Peshawar, the 18<sup>th</sup> July, 2019

(25)

**NOTIFICATION**

**No.SOE.IV(E&AD)/1-35/2014:-**

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SOE.IV.(E&AD)/1-35/2012 dated 6<sup>th</sup> December, 2012, the following amendments shall be made, namely:

**AMENDMENTS**

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Junior Clerk.	(i) FA/ F.Sc with second division or equivalent qualification from a recognized Board; and  (ii) a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed FA/F.Sc Examination or its equivalent qualification from a recognized Board; and  (b) sixty per cent by initial recruitment.  <b>Note:</b> For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification.

197-7-10

81

C

W

L

Marks = 67 per word

5

Office of the District Education Officer (Male) Bannu.

Typing Test for Junior Clerk

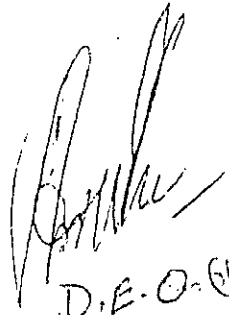
Total Time: 05 Minutes  
Total words: 150  
Speed: 30 Words P Minute  
Total Marks: 100  
Passing marks: 50

Typing Paragraph

1- The human body is a gift of God. It is like a machine. But no inventor can make such a perfect machine as the human body. It is one of our foremost duties to take care of it. We must try our best to keep ourselves healthy and fit.

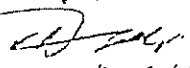
2- The requirements of good health can be divided in to three categories. We should take the right quality and right quantity of food. We should have habits which promote good health. We should take care to protect ourselves from diseases.

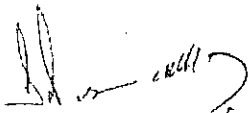
3- Some children have strange habits about food. They have a strong liking for certain things and a strong dislike for others. For instance; a child refuses to drink milk and is fond of tea. This means he is depriving himself of a valuable food.

①   
D.E.O. (Male)  
Bannu. 13/3/2020

④ Farzind Ali Supalli  
 13/3/2020

⑤ Rukhan Dad  
S/C

②   
MST# 13/3/2020  
Mahmood Khan

③   
Ihsanullah  
S/Clerk

⑩

48

13/3/2020

District Education Officer  
E.O. (M)  
BAU

*[Signature]*  
c/s

13/3/2020

03429346577

*[Signature]*

*[Signature]*  
12/1/17

*[Signature]*

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...

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*[Signature]*

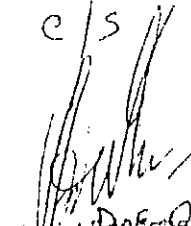
*[Signature]*

⑦  
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

STATEMENT SHOWING RESULT OF PROMOTION FROM CLASS IV TO JUNIOR CLERK TEST HELD AT DEO (M) BANNU ON DATED 13.03.2020.

S.#	NAME	ROLL NO.	TOTAL MARKS	MARKS OBTAINED	REMARKS
1-	RIFATULLAH KHA	03	100	00 (ZERO)	FAILED
2-	WAHEED ULLAH SHAH	06	100	00 (ZERO)	FAILED
3-	H.HAMEED ULLAH	07	100	00 (ZERO)	FAILED
4-	M.IBRAHIM	08	100	00 (ZERO)	FAILED
5-	ABDUR RAUF	09	100	00 (ZERO)	FAILED
6-	M.USMAN KHAN	11	100	24. (TWENTY FOUR)	FAILED
7-	NASER ALI KHAN	13	100	09. (NINE)	FAILED
8-	ASIF KHAN	15	100	31. (THIRTY ONE)	FAILED
9-	ASHRAFULLAH	16	100	12 (TWELEVE)	FAILED
10-	TAJ MURAD KHAN	18	100	58 FIFTY EIGHT)	PASSED
11-	RASOOL KHAN	19	100	00 (ZERO)	FAILED
12-	ALAM ZEB KHAN	22	100	05 (FIVE)	FAILED
13-	TAZA KHAN	23	100	00 (ZERO)	FAILED
14-	H.SHRIFULLAH	25	100	00 (ZERO)	FAILED
15-	KASHIF KHAN	27	100	14. (FOURTEEN)	FAILED
16-	IHSANULLAH	28	100	06. (SIX)	FAILED
17-	WIQAR KHAN	29	100	00 (ZERO)	FAILED
18-	DIL FARAZ KHAN	35	100	00 (ZERO)	FAILED
19-	DILA BAZ KHAN	37	100	22. (TWENTY TWO)	FAILED
20-	IRFANULLAH KH	38	100	11. (ELEVEEN)	FAILED
21-	REHMATULLAH SHA	39	100	35. (THIRTY FIVE)	FAILED
22-	FARMAN ULLAH	40	100	18. (EIGHTEEN)	FAILED
23-	MUHD: DIAZ KH	41	100	00(ZERO)	FAILED
24-	FATIH ULLAH	45	100	22. (TWENTY TWO)	FAILED
25-	MEHERULLAH	50	100	17. (SEVENTEEN)	FAILED
26-	HIDAYATULLAH	51	100	00 (ZERO)	FAILED
27-	IMRANULLAH	52	100	15. (FIFTEEN)	FAILED
28-	ASGHAR ALI KHA	53	100	16. (SIXTEEN)	FAILED

1, MAHMOOD KHAN  
SIC  
2, IHSANULLAH  
SIC  
3, ARSHAD SAIED  
SIC  
4, RAHMAN DAD  
SIC

c/s  
  
District Education Officer  
(Male) Bannu

8

29-	HAMEEDULLAH	54	100	50 (FIFTY)	PASSED
30-	NASIR KHAN	55-	100	16 (SIXTEEN)	FAILED
31-	ZAHOR ANWAR	56	100	00 (ZERO)	FAILED
32-	MUHD: MASOOD	57	100	37 (THIRTY SEVEN)	FAILED
33-	IBRAR KHAN	58	100	00 (ZERO)	FAILED

*[Signature]* 13/3/2020

District Education officer  
(Male) Bannu  
District Education Officer  
(Male) Bannu

TOTAL CANDIDATES CALLED = 58  
TOTAL APPEARED = 35  
TOTAL PASSED = 02  
TOTAL FAILED = 31

- 1- *[Signature]* Assistant B-16
- 2- *[Signature]* PA to DEO (MD) Bannu - B-14
- 3- *[Signature]* Deput Assistant B-14
- 4- *[Signature]* S/clock B-14

(9)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU.

MINUTES OF THE MEETING REGARDING CLASS-IV PROMOTION CASES.

A Meeting was held on 14-03-2020 at 12.00PM on the subject above in the office of the DEO Bannu. The following Officer attended the meeting.

- |    |                                   |           |
|----|-----------------------------------|-----------|
| 1- | DEO (M) E&SE, Bannu.              | Chairman. |
| 2- | Nominee of the Director E&SED KPK | Member    |
| 3- | ADEO Estab: Secy:                 | Member    |
| 4- | Dealing Assistant                 | Member    |

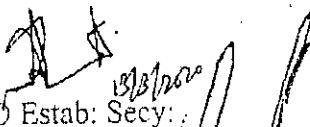
The meeting commenced with recitation from Holy Quran. The DEO (M) Bannu well-come the participants of the meeting and invited formal discussion on the agenda items. The Dealing Assistant Ministerial staff local Office highlighted the Promotion cases of Class-IV servants on the basis of seniority cum fitness in light of Govt. policy/Notification issued under Endst: No. SOE-IV(E&A)1/35/2014 dated; 18<sup>th</sup> July, 2019. He further Explained that Final seniority list (Common) of Class-IV servants District Bannu was prepared up to 31-12-2019 and pasted on notice board for seven days as well as endorsed to all Head of Institutions(Male) in District Bannu, but no objection was received to this office, therefore in light of Notification issued by DEO(M) Bannu vide No.2497-2502 Dated:10-03-2020, typing test was conducted on 13-3-2020 in the office Hall and 33 Class-IV servants were presented in the test out of 58. The type test was passed 02 candidate out of 33 as per result statement dated: 13-03-2020. The dealing assistant further explained that 04 J/Clerk post were reserved for 10% promotion quota, from Class-IV to Junior Clerk in District Bannu, the following Class-IV were interviewed and found fit for promotion from Class-IV post to the post of J/Clerk on seniority cum fitness bases as per detail given below:-

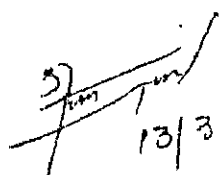
S.No.	Name & Designation	Qualifications	Date of Ist Appointment.	Test Marks	Remarks
1-	Taj Murad N/Q DEO (M) Office Bannu.	FA/session 12-02-2015	22-04-1998.	58/100	Selected for J/Clerk post B-11 under 10% promotion quota on the basis of passing type test seniority cum fitness
2-	Hamidullah Chowkidar Chowkidar GPS Nawab Khan Mamash Khel Bannu	BA/DIT 12-04-2013	29-08-2009	50/100	-d-

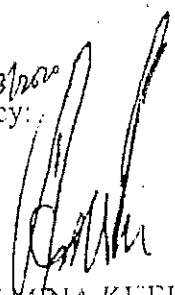
The DSC/DPC committee thoroughly checked the working papers as well as Seniority list and documents of the above candidates and also they were interviewed. After a length of discussion the house unanimously agreed that promotion order from class-IV to the post of J/Clerk B-11 of the above two Class-IV Official on the basis of seniority cum fitness may be issued out of 10% reserve quota on merit basis please.

The meeting ended with the vote of thanks.

  
Dealing Assistant

  
ADEO Estab: Secy:

  
13/3/2020  
Nominee of the Directorate

  
(ATTAULLAH KHAN MINA KHEL)  
DISTRICT EDUCATION OFFICER,  
(Male) BANNU



"E" ~~10~~ (10) Better copy

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU.**  
**PROMOTION ADJUSTMENT ORDER.**

Consequent upon the recommendation by the DPC/DSC Committee Education Department Bannu, the following Class-IV Govt. Servants Education Department District Bannu, are hereby promoted and adjusted against vacant J/Clerk post, w.e.f the date of taking over charge in the interest of public service, out of 40% promotion quota on the basis of seniority cum-fitness in light of Govt. policy dated 18 July, 2019 on merit basis as per the terms & conditions given below.

S. No	Name & Designation	Place of posting	Adjusted as J/Clerk	Remarks
1.	Taj Murad NO/WC FA	DEO (M) Office Bannu.	GHS Murib khel Bake Khel Bannu.	Adjusted against J/Clerk vacant post.
2.	Hamid Ullah Chowkidar BA/DIT	GPS Nawab Khan Mamash Khel Bannu.	GHSS Al-Hamid wati Noor Jani Khel Bannu.	Adjusted against J/Clerk vacant post.

**TERMS & CONDITIONS.**

1. Their regular basis promotion is issued as per the approval of DPC/DSC on the basis of seniority cum fitness.
2. They will be on probation for a period of one year extendable for another one year.
3. They will be reverted at any time without assigning any reason or notice to their original post if their efficiency is found unsatisfactory.
4. They are directed to join their new assignment within 15 days otherwise it will be presumed that they have xxx their promotion.
5. Their inter seniority on lower post will intact as usual.
6. Charge report should be submitted to all concerned.
7. No TA/DA is allowed.

Sd/-  
**(ATAULLAH KHAN MINAKHEL)**  
DISTRICT EDUCATION OFFICER.  
(MALE BANNU).

Endst: No. 3371-80/post Class-IV staff Dated Bannu the 14-03-2020.

Copy for information and necessary action to the:

1. Director of Elementary & Secondary Education Department, NWFP.
2. Deputy DEO (M) Bannu.
3. SDEO (M) Bannu.
4. District Accounts Officer, Bannu.
5. Principal / Head Master Concerned School.
6. Official concerned for strict compliance and report.

Sd/-  
District Education Officer,  
Male, Bannu

(11)

**OFFICE OF THE DISTRICT EDUCATION OFFICER MALE BANNU**

SENIORITY LIST OF CLASS-IV FOR PROMOTION TO JCLERK IN-DISTRICT BANNU UPDATED 31-01-2020 (Not valid for court)

S.No	Name	School/Office	Designation	BPS	D/O/Birth	D/O/1st Appointmen	Qualification	FA Passing Year
1	MURAD ALI KHAN	GPS DEGAN KHASS	Chowkidar	2	06-05-65	01-09-89	FA	1985
2	Mohammad Ishaq	GPS Panz khoni khel	Chowkidar	2	08-02-72	29-04-92	FA	11-10-92
3	ABDUL QAYUM	GPS IMTIAZ-KHUJRAM KHEL	Chowkidar	2	14-19-1968	01-01-94	FA	01-01-99
4	ABDUL SAMAD KHAN	GPS SABO KHEL-ABDUL QAYUM	CHOWKIDAR	2	03-01-74	25-04-90	FA	16-03-95
5	Idil Faraz Khan	GHS Bazar Ahmad Khan Bannu	N/Oasid	2	10-05-72	11-05-96	FA	1995
6	GUL AJAB NOOR	GPS SHAHBAZ KAKKI NO.2	Chowkidar	2	25-02-61	04-11-96	FA	04-03-81
7	Mabaz Khan	GPS Zabar Dasi Mandew	Chowkidar	2	19-01-71	04-11-97	FA	1991
8	IRFANULLAH KHAN	GPS JAHANGIR KAKKI	Chowkidar	2	09-04-71	09-01-98	FA	01-07-90
9	RAHMAT ULLAH KHAN	GPS WALHI MAMAKHEL	Chowkidar	2	09-01-67	16-01-99	FA	26-06-89
10	FARMANULLAH KHAN	GPS MAZANGA LANDIDAK	Chowkidar	2	23-03-77	19-07-99	FA	16-01-96
11	Aisar Ali Shah	GHS No.1 Bannu	Lab Attendent	2	01-12-71	01-12-93	FA	10-08-00
12	MUHAMMAD LIAZ	MUHAMMAD AYAZ	N/Oasid	2	15-08-77	18-10-00	FA	1997
13	Chutani Mustafa Khan	GMS Muhammad Khan Kakki Bannu	Sweeper	2	10-01-80	02-05-01	FA	2000
14	Rifat Ullah Khan	GHS Khujan Babar Bannu	N/Oasid	2	03-04-81	18-10-00	FA	19-12-03
15	FALAK NAZ	GHS NO.3.BANNU	LAB ATTENDENT	2	10-02-78	01-10-96	FA	30-03-05
16	Shahid Ali Shah	GPS PIR SABER SHAH	CHOWKIDAR	2	04-01-84	01-01-06	FA	26-01-04
17	Fatih Ullah Khan	GHS Gul Zaman Ghoriwala	Sweeper	2	10-08-85	23-02-06	FA	2005
18	WAHIDULLAH SHAH	GPS GUL SHAHDARAZ KAKKI	Chowkidar	2	02-05-83	09-01-06	FA	05-08-06
19	ZAFIRULLAH KHAN	GPS NEKUM KAKKI	Chowkidar	2	08-04-84	01-09-06	FA	12-05-05
20	MURAD ALI KHAN	GPS LEWAN DARDARIZ	Chowkidar	2	07-06-71	21-12-06	FA	13-06-00
21	Zehran Khan	GPS Bazida yousaf Khan	Chowkidar	2	14-04-90	07-08-07	FA	26-06-06
22	MEHRULLAH KHAN	GPS AMIRDAD KHAWAJAMAD-LANDIDAK	Chowkidar	2	20-04-88	06-03-08	FA	19-03-07
23	HAFIZ HAMID ULLAH	GPS BAYAZ-KHAN-DARDARIZ	Chowkidar	2	05-05-78	10-01-07	FA	10-03-08
24	Hamid Ullah	GPS Nawazb Khan Mamash Khel	Chowkidar	2	12-03-98	29-08-09	FA	2009
25	Muhammad Ibrahim	GHS Bawaf Khan Bannu	Sweeper	2	12-01-78	09-05-96	FA	27-12-09
26	ATTA ULLAH KHAN	GHSS NURAR BANNU	NAIB QASID	2	14-02-79	10-11-09	FA	30-03-05
27	Sajid Ali Shah	GPS Ghani Machan Khel	CHOWKIDAR	2	01-08-83	17-12-09	FA	21-11-01
28	SARTAJ ALI KHAN	GPS ASLAM KHAN DARDARIZ	Chowkidar	2	02-12-92	01-07-10	FA	20-07-01
29	SHAHID KHAN	GPS WALI AYAZ MAD MIR KAKKI	Chowkidar	2	03-12-84	19-01-10	FA	21-03-10
30	Kashif Khan	GPS Fazal haq malwana	Chowkidar	2	05-01-82	15-04-07	FA	07-03-11
31	Saif Ullah	GMS Hassan Khel Kharaki Bannu	N/O	3	06-10-91	11-06-11	FA	21-07-10
32	TAHIR ULLAH	GPS KOT-PUSHA	Chowkidar	2	08-02-79	12-06-11	FA	13-11-07

	Saad Ullah Khan	GPS Saleh Khan Mendew	Chowkida	2	02-03-74	01-07-11	FA	2010
	SHOUR RAUF KHAN	GHSS NURAN BANNU	MA9 CAS 2	2	05-02-70	31-08-08	FA	23-12-11
35	Nazar Rehman	GPS Sadat madak shah	Chowkida	2	02-01-76	10-11-12	FA	2011
36	ANWAR ULLAH KHAN	GPS MIR SHAH JAHAN MAMAKHEL	Chowkida	2	01-04-82	11-07-12	FA	24-12-10
37	Muhammed Riaz Khan	GPS Siandar Bharal Bannu	NO	2	01-03-88	13-07-12	FA	0174
38	MUJAHID KHAN	GPS NAR MANSI KHAN	Chowkida	2	27-02-74	05-03-10	FA	21-07-12
39	ISRAR KHAN	GPS TOOR KHAN MAMA KHEL	Chowkida	2	22-05-65	10-09-12	FA	25-09-10
40	Nazer Rahman	GPS Sadat madak shah	Chowkida	2	01-02-76	01-10-12	FA	20-03-03
41	Sahad Ullah	GHSS Hakim Faved Bannu	NO/Case	2	15-03-90	09-10-12	FA	26-07-09
42	Muhammed Usman	GHS No.2 Bannu	NO/Case	2	10-03-92	01-05-10	FA	05-12-12
43	NAJEEB ULLAH KHAN	GPS HABAT KHAN MANDAN	CHOWKIDAR	2	15/09/1987	07-12-12	FA	08-10-08
44	Rafidullah Shah	GHS No. 2 Bannu	Lat Attendant	2	28-04-92	20-02-13	FA	2010
45	Amjad Ali Shah	GHS No.2 Bannu	Sweeper	2	07-05-93	01-03-13	FA	28-10-11
46	JAVED ZAMAN	GPS AMIR KHAN BHARAT	Chowkida	2	23-09-87	05-11-09	FA	04-08-13
47	NASRALI KHAN	GPS HAYAT KAKKI	Chowkida	2	15-02-59	14-12-97	FA	06-08-13
48	MUNIK SHAN	GPS NAR KHAN BANNU	CHOWKIDAR	2	08-08-89	25-10-13	FA	26-07-09
49	SUFIAN KHAN	GPS MIR KABOOT KHOJARY	Chowkida	2	04-08-95	28-10-12	FA	23-07-11
50	KRIF ULLAH KHAN	GPS ALAM MACHIN KHEL	Chowkida	2	08-02-53	25-10-12	FA	02-02-08
51	MUHAMMAD FAYAZ	GPS SHEKH MAHMOOD KAKKI	Chowkida	2	28-02-87	23-11-13	FA	01-12-13
52	Asif Khan	GPS No.2 Bannu	Resort	2	14-03-87	24-10-10	FA	01-12-13
53	SAAD ULLAH KHAN	GPS NO-1 BANNU	CHOWKIDAR	2	18-04-88	14-03-07	FA	01-12-12
54	Muhammad Javid	GPS Wanda ghalar	Chowkida	2	04-02-84	28-04-14	FA	17-10-08
55	Salah Ud Din	GPS Gatera Shah Jahan	Chowkida	2	19-04-84	02-05-14	FA	2012
56	ASHRAFULLAH	GPS SAHADAR MANAK KHEL	L/All	2	20-03-95	02-07-10	FA	26-07-14
57	ALLAH NOOR KHAN	GPS FAR KHEL KAKKI NO.1	Chowkida	2	14-03-78	25-11-14	FA	14-03-07
58	Taj Murad Khan	GPS Male Bannu	NO/Case	2	13-03-70	22-04-06	FA	05-03-10
59	Zehid Rehman	GPS Sekari Jabbar No.1	CHOWKIDAR	2	05-03-90	12-02-11	FA	05-03-10
60	Resool Khan	GPS Male Bannu	Dahar	2	1984	14-10-13	FA	06-10-15
61	ZAFAR REHMAN	GPS NAR NAJEEB	Chowkida	2	28-04-80	21-11-15	FA	1995
62	KHALID KHAN	GPS SEBI KHAN BARDARIE	Chowkida	2	20-05-83	21-11-15	FA	20-07-12
63	Muzb Ullah	GPS Khan Zaman Muzat	Chowkida	2	04-10-92	21-11-15	FA	2011
64	FARID ULLAH	GPS RAINA KHEL BANNU	L/ATTENDENT	2	14-06-84	21-11-15	FA	2011
65	ASHRAF ULLAH KHAN	GPS DIL NW-2 BHARAT	Chowkida	2	11-05-84	22-11-15	FA	2011
66	Izzat Rahman	GPS Amir Mohallir Ielozai	Chowkida	2	15-04-95	07-01-16	FA	25-07-13

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Provided that-

- (i) If two or more officials have acquired the FAF.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post;
- (ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials;

Provided further that The condition of FAF.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daffaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11).

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CHIEF SECRETARY  
KHYBER PAKHTUNKHWA