

Service Appeal No.1067/22

#### **VERSUS**

- 1) Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar
- 2) Secretary Finance Department, Khyber Pakhtunkhwa Civil Secretariat Peshawar
- 3) The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
- 4) Regional Police Officer, Malakand at Saidu Sharif Swat......Respondents.

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(Zahir Shah) SI Legal Dir Lower

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- 4. Regional Police Officer, Malakand at Saidu Sharif Swat......Respondents.

### PARA WISE REPLY BY RESPONDENTS NO. 03 AND 04.

Respectfully Sheweth:

#### PRELIMINARY OBJECTIONS.

- 1) That the service appeal is not maintainable in its present form
- 2) That the appellant has not come to this honourable Service Tribunal with clean hands.
- 3) That the present appeal is badly barred by law & limitation.
- 4) That the instant appeal is bad for mis-joinder and non-joinder.
- 5) That the appellant has got no cause of action.
- 6) That the appellant has concealed the material facts form this honorable Tribunal.

#### ON FACTS.

- 1. Incorrect, the appellant was enlisted as SPO purely on contract basis on fixed pay of Rs.10000/- not 15000/- vide OB No.1094 dated 29-07-2009 (copy of enlistment order is enclosed as Annexure "A").
- Pertains to the record of august Supreme Court of Pakistan, however the
  appellant shall dealt strictly in accordance with Khyber Pakhtunkhawa
  Special Police Officers Regularization of Services Act 2019 where there is no
  provision exists.





- 3. Incorrect, the appellant was enlisted as SPO purely on contract basis and later on regularized under Section-3 of KP Special Police Officers (Regularization of Services) Act 2019. Every notification is issued with immediate effect. (Copy of Act and notification is enclosed as "B"-"C")
- 4. Incorrect, as already discussed that the appellant was recruited on contract basis and his Services was regularized in the light of KP Special Police Officer (Regularization of Services) Act 2019. Now the appellant service is regular and his plea regarding counting contract service as regular is not justifiable and based on flimsy grounds, liable to be dismissed.

### GROUNDS.

- A. Incorrect, the appellant has been treated in accordance with law and no violation of rules has been committed by the respondents.
- B. Incorrect, the appellant services has been regularized in view of the ibid Act in the very spirit of natural justice.
- C. Correct to the extent that appellant was remained in contract service under the command of respondents and later on regularized however legally, he is not entitled for the benefits being asked for.
- D. Each and every case has its own facts and circumstances. The appellant is not entitled for such entitlement.
- E. Already discussed in preceding paras, no comments.
- F. Incorrect, the appellant was regularized in service as per KP Special Police Officers (Regularization of services) Act 2019 and earlier appellant was recruited purely on contract basis with fixed pay of Rs.10000/-. Therefore he has no legal rights for the purpose.
- G. Incorrect, no violation of the law / rules and constitution of Pakistan has been committed by the respondents.
- H. The respondents may also be allowed to adduce additional grounds at the time of argument / hearing.



### PRAYER.

Keeping in view of above submission, the instant appeal, being devoid of merits may graciously be dismissed with costs please.

Inspector General of Police Khyber Pakhtunkhwa Peshawar.

Regional Police Officer, Malakand at Saidu Sharif Swat.

> Regional Police Officer Malakand Region Saldu Sharif Swat.



Service Appeal No.1067/22

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- 4. Regional Police Officer, Malakand at Saidu Sharif Swat......Respondents.

#### **POWER OF ATTORNEY**

SI Zahir Shah of Legal Branch Dir Lower is hereby authorized to appear on our behalf before the Honorable Service Tribunal and to pursue the case on each and every date.

He is also authorized to submit the comments in connection with the above Service Appeal.

**Inspector General of Police** Khyber Pakhtunkhwa Peshawar.

Regional Police Officer, Malakand at Saidu Sharif, Swat.

> Regions! Police Officer Malakans Region Saldu Starl Strat



Service Appeal No.1067/22

#### **VERSUS**

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- 2. Secretary Finance Department, Khyber Pakhtunkhwa Civil Secretariat Peshawar
- 3. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
- 4. Regional Police Officer, Malakand at Saidu Sharif Swat..........Respondents.

#### AFFIDAVIT.

I, Zahir Shah SI Legal District Dir Lower do hereby solemnly affirm and declare on oath, that the contents of the Para wise reply is true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Court.

(Zahir Shah Khan SI Legal Dir Lower



# B) Annexuse per

The following personals are hereby enlisted as Special Police officer on scontract basis for a period of 02 years w.e., if 21:07:2009 on monthly fixed salary of Rs 10,000/-in aght of Provincial Police Officer NWFI Peshawar Letter no:15392/E-II dated:20-06-2009,17472-79/E-II dated 13-07-09 and Letter No: 17901-6/E-II dated17-07-09 their service will be purely of temporary nature and will be terminated by the Authority without showing any reason and notice.

| S#               | Name              | Father Name  | Address  | Tehsil     | Alloted<br>Const: No: |
|------------------|-------------------|--|--|------------|-----------------------|
|                  | Zubair Shah       | Fazal Rehman   | Yar Khan Banda   | Tuner Gara | 1/spo                 |
| 2                | Ayaz Khan         | Dawa Khan  | Begham Dara  | Timer Gara | 2Jspo                 |
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| 4 4              | Muhammad Farid    | Muslim Khan  | Seyar Dara   | Timer Gara | 4/spo                 |
| 5                | Zakir Ullah       | Dawa Khan  | Peto Dara  | Timer Gara | 5/spo                 |
| 6:               | Muhammad Amin     | Muhammad Arif  | Macho Talash   | Timer Gara | 6/spo                 |
| 7                | Taj Muhammad      | Said Rehman  | Yar khan Banda   | Timer Gara | 7/spo                 |
| 38 4             | "Muhammad Ralique | Zubardast  | Shamshi Khan   | Timer Gara | 8/spo                 |
| 9 🗸              | Nazir Muhammud    | Wali Muhammud  | Bundai Kandaw  | Timer Gara | 9/spo                 |
| 10               | <del></del>       | Sher Muhammad Khan   | Yar Khan Banda   | Timer Gara | 10/spó                |
| 211/             | Muhammad Uzair    | Muhammad Zahir Shah  | Shekh Banda  | Timer Gara | 11/spo                |
|                  | -Ihsanullah       | <sup>†</sup> Fazal Reliman   | Chenar Tangai  | Timer Gara | 12/spo                |
| 13 ×             | Muhammad Jamil    | Saleh Muhammad   | Yar Khan Banda   | Timer Gara | 13/spo                |
| <u>14 - </u>     | lkramullah -      | Gul Khan   | Yar Khan Banda   | Timer Gara | 14/spo                |
|                  | Muhammad Sadiq    | Muhammad Bostan  | Shago Kas  | Timer Gara | 15/spo                |
| 16               | Muhammad Adil .   | Said Aziz Khan   | Yar Khan Banda   | Timer Gara | 16/spo                |
| 17√              | Saghir Alam       | Sher Qayim   | Begham Dara  | Timer Gara | 17/spo                |
| 18               | Aminullah         | Said Akbur Khan  | Mian Banda   | Timer Gara | 18/spo                |
| 19 -             | Anwar Zaib        | Muhammad Wazir   | Ambar Zai  | Timer Gara |                       |
| 20/              | Azizullah         | Inayat Khan  | Danwa  | Timer Gara | 19/spo                |
| 214              | Shafiur Relunan   | Ihsanur Rehman   | Mian Banda   | Timer Gara | 20/spo                |
| 22               | Laig Muhammad     | Fazal hadi   | Chenar Tangai  | Timer Gara | 21/spo                |
| 23-1             | Rehmatullah       | Sahib Zada   | Syar Dara  | Times Comm | 22/spo                |
| 24 1             | Muhammad Ayuh     | Badshah Ghani  | Syur Dara  | Timer Garn | 23/spo                |
| 25               | Fazal Hamced      | Noor Wahid   | Syar Dara  | Timer Gara | 24/spo                |
| 26               | Jehan Bakhat Said | Abdul Wahid  | Syar Dara  | Timer Gara | 25'spo                |
| 27 .             | Ali Muhammad      | Gol Muhammad   | Banrgai  | Timer Gara | 26/spo                |
| 28 v             | Muhammad Saleem   | Fazal Malík  | Bajuro   | Timer Gara | 27/spo                |
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| 48 - Muhammad Rasool 🗸   | Abdussatar   | Banga -                     | Timer Gara            |
| 🤼 Nt Irshad Hussain 🥈 🔻  | Shah Zamin   | Begliam Dara                | Timer Gara            |
| 80 Mangir Khan   | Bukhtiar Khan  | Qila Shinishi Khan          | Timer Gara            |
| <1 \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\  | Maslahuddin  | Shamshi Khan                | Timer Gara            |
| S Bakhi Zada   | Sher Muhammad  | Kano Shamshi Khan           | , Timer Gara          |
| 5 Thuanin Shah   | Nhan Rahim Shah  | I Manuala Khan              | Timer Gara            |
| Sa Zahoor Elahi  | Cibulam Habib  | Bugh Dushkhel               | Timer Gara            |
| 88 Hayat Muhammad  | Am Muhammad  | Bagh Dushkhel               | Timer Gara            |
| So I Mian Muhammad   | Gul Muhammad   | Banrgar  <br>  Shamshi Khan | Timer Gara            |
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| 50 Haji Sarwar   | Sakhi Sarwar   | Amlook Dara                 | Timer Gara            |
| 60   Qadar Gul -   | Hazrat Gul<br>Muhammad Ratique   | Bajuro                      | Timer Gara            |
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| 62 - Muhammad Ghafoos _  | Hesab Gul  | Barikot                     | Timer Gara            |
| the same same same   | Abdur Raziq  | Bajuro                      | Timer Gara            |
|  | Habibur Rehman   | Bajuro                      | Timer Gara            |
| 7 Tariq Khan   | Amir Baz Khan  | Bajuro                      | Timer Gara            |
| 66   Waqif Khan / Shakeel Ahmad -  | Halimur Rahim  | Shamshi Khan                | Timer Gara            |
| os Adil Ahmad  | Bashiruddin  | Shamshi Khan                | Timer Gara            |
| 69 Muhammad Rafique  | Ghulam Sadiq   | Ziarat Talash               | Timer Gara            |
| 70 . Hamayun Khan  | Beradar khan   | - Sho Ba Ba                 | Timer Gara            |
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| 73 Azızul Hakim  | Muhammad Hakim   | Ziarat Talash               | Timer Gara            |
| 74   Islam Khan  | Gul Zamin  | Dehm Talash                 | Timer Gara            |
| 75 - Salim Khan  | Wazir khan   | Shamslu Khao                | Timer Gara            |
| 76 . Akhtar Husssam  | Gul Mardio   | Alulook Dara                | Timer Gara            |
| 17 - Babo Zaman  | Musamin Khan   | Barekot                     | Timer Gara            |
| - S. Anwar Ul Haq  | Strajul Haq  | K.mo Shamshi Khan           | Timer Gara            |
| 70 J Farid Gul   | Buna Gul   | Ahmad Gali                  | Timer Gara            |
| So - Muhammad Nacem V  | Muhammad Fahim Khan  | Kuno Shamshi Khan           | Timor Gara            |
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| Mohammad Jamil  | Muhammal Kalim  | Bajauro              | Larger Gara        | _107.spo             |
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District Police Officer. Dir Lower at Timergara. 9

Annexure ( 66B 66 )

# THE KHYBER PAKHTUNKHWA SPECIAL POLICE OFFICERS (REGULARIZATION OF SERVICES) ACT, 2019

### (KHYBER PAKHTUNKHWA ACT NO. XXXVII OF 2019)

#### CONTENTS

#### **PREAMBLE**

- 1. Short title, extent and commencement.
- 2. Definitions.
- 3. Regularization of services of Special Police Officers.
- 4. Determination of seniority.
- 5. Scrutiny Committee.
- 6. Overriding effect.
- 7. Removal of difficulties.

Central Police Office



## THE KHYBER PAKHTUNKHWA SPECIAL POLICE OFFICERS (REGULARIZATION OF SERVICES) ACT, 2019

#### (KHYBER PAKHTUNKHWA ACT NO. XXXVII OF 2019)

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa, (Extraordinary), dated 8<sup>th</sup> October, 2019).

AN ACT

to provide for the regularization of the services of Special Police Officers appointed on contract basis or fixed pay basis.

WHEREAS it is expedient to provide for the regularization of the services of Special Police Officers, appointed on contract basis or fixed pay basis, from time to time, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:

- **I.** Short title, extent and commencement.---(1) This Act may be called the Khyber Pakhtunkhwa Special Police Officers (Regularization of Services) Act, 2019.
  - (2) It shall extend to the whole of the Province of the Khyber Pakhtunkhwa.
  - (3) It shall come into the force at once.
- 2. **Definitions.---** In this Act unless the context otherwise provides, the following expressions shall have the same meanings as are assigned to them, that is to say-
  - (a) "contract appointment" means appointment of Special Police Officers, made otherwise than in accordance with the prescribed method of recruitment;
  - (b) "Government" means the Government of the Khyber Pakhtunkhwa;
  - (c) "law or rule" means the law or rule, for the time being in force, governing the selection and appointment of Police Force in Khyber Pakhtunkhwa Province;
  - (d) "Police Department" means the Police Department of the Khyber Pakhtunkhwa Province;
  - (e) "post" means a post under Government or in connection with the affairs of Government to be filled in through prescribed method; and

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- (f) "Special Police Officer" means an employee, appointed in Police Department, from time to time, on contract basis or fixed pay basis, under the nomenclature of Special Police Officers or Special Police Force, performing Police or security duties.
- 3. Regularization of services of Special Police Officers.—All the Special Police Officers, appointed on contract basis or fixed pay basis who are holding the post on 1<sup>st</sup> August 2019, shall be regularized with immediate effect, subject to the condition of section 5 of this Act.
- 4. Determination of seniority.---(1) The Special Police Officers, whose services are regularized under this Act, shall rank junior to all other members of the Police Force who are in service on regular basis on the commencement of this Act.
- (2) The inter se seniority of the Special Police Officers, whose services are regularized under this Act, within the same rank, shall be determined on the basis of their continuous officiating service in the rank:

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

- 5. Scrutiny Committee.—(1) A Scrutiny Committee, headed by the District Police Officer and having one member each from the District Administration and District Account Officer of the District concerned, shall prepare lists of all members of the Special Police Officers, after personal appearance and verification of CNIC's and scrutiny of record of the Special Police Officers for the submission to Provincial Police Officer.
- (2) The lists, submitted to the Provincial Police Officer, under sub-rule (1), after proper sifting, shall be forwarded to Home and Tribal Affairs Department of the Government with the recommendations for regularization of members of the Special Police Officers in the Police Department.
- (3) The Home and Tribal Affairs Department of Government, after receiving the lists of all members of Special Police Officers shall issue notification of regularization of Special Police Officers into Police after approval of the Cabinet.
- 6. Overriding effect.---Notwithstanding anything 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 provision of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.
- 7. Removal of difficulties.—If any difficulty arises in giving effect to any of the provisions of this Act, Government may issue such order as may appear to it to be necessary for the purpose of removing such difficulty; provided that no such powers shall be exercised after the expiry of one year from the coming into force of this Act.

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## Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department

Dated Peshawar the April 8th, 2020

Annexure ("C")

No.SO(Budget)/HD/15-29/2016 Vol-D: In pursuance of the provisions contained in Section 3 read with Section 5 of the Khyber Pakhtunkhwa Special Police Officers (Regularization of Services) Act, 2019 (Khyber Pakhtunkhwa Act No.XXVII of 2019) and on the recommendation of Provincial Police Officer, Khyber Pakhtunkhwa and approval of the Provincial Cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regularization of the following Special Police Officers (SPOs) working in District Dir Lower under ODO Code DA4021- Law & Order Dir Lower as Constables (BPS-07) with effect from 01-03-2020:

| S.No                 | Nieme                   | Father Name          | Belt No. |
|----------------------|-------------------------|----------------------|----------|
| 1                    | Zubair Shah             | Fazal Rahman         | 1        |
| 2                    | Ayaz Khan               | Dawa Khan            | 2        |
| 3                    | Muhammad kamal          | Muhammad Ismaeel     | 3        |
| 4                    | Alam Zeb                | Aziz ur Rahman       | 4        |
| 5                    | Zakirullah              | Dawa Khan e          | 5        |
| 6                    | Muhammad Amin           | Muhammad Arif Khan   | 6        |
| 7                    | Taj Muhammad            | Syed Rahman          | 7        |
| 8                    | Aurang Zaib             | Gul Karam Khan       | 8        |
| 9                    | Fazal Hussain           | Muzamin Khan         | 9        |
| 10                   | Tajarnmul Khan          | Sher Muhammad Khari  | 10       |
| 11                   | Bakht Sardar            | Sher Muhammad Khan   | 11       |
| 12                   | Thsanullah              | Fazal Rahman         | 12       |
| 13                   | Gut Zamin Khan          | Bakhtawar            | 13       |
| 14                   | Horamullah              | Gul Khan             | 14       |
| 15                   | Muhammad Sadig Khan     | Muhammad Bostan Khan | 15       |
| 16                   | Hramullah               | Nadar Khan           | ~        |
| 17                   | Daulat Khan             | Akbar Khan           | 16       |
| 18                   | Aminullah Khan          | Syed Akbar Khan      | 17       |
| 19                   | Anwar Zaib              | Muhammad Wazir       | 18       |
| 20                   | Azizullah               | Inayat Khan          | 19       |
| 21                   | Zahir Khan              | Mirza Gul            | 20       |
| 22.                  | Laiag Muhammad          | Fazal Hadi           | 21       |
| 23                   | Muhammad Jamil          | Mehmood Khan         | 2.2      |
| 24                   | Yousaf Khan             | Sarzanin Khan        | 23       |
| 25                   | Muhammad Wahid          | Shaibar Khan         | 24       |
| 26                   | Deedar Gul              | Stana Gul            | 25       |
| 27                   | Ali Muhammad            | Gul Muhammad         | 26       |
| 28                   | Muhammad Salim          | Fazal Malik          | 2.7      |
| . 29                 | Naeem Ullah             | Gul Rahim            | 28       |
| 30                   | Sher Zaman Khan         | Ahmad Khan           | 29       |
| 31                   | Amjad Khan              | Rahim Gul            | 30       |
| 32                   | Muhammad Hasham         | Bakht Zamin          | 31       |
| 33                   | Abdul Faroog Khan       | Abdul Wakeel Khan    | 32       |
| 33<br>34<br>35<br>36 | Jawad All               | Nazir Malik          | 33       |
| 35 -                 | Muhammad Ayaz           | Noor Hakim           | 34       |
|                      | Rohullah                | Hamdullah            | 35       |
| $\frac{37}{38}$      | Bahadar Zalli           | Syed Khan            | 36       |
| = 38<br>39           | Rahim Budshah           | Muhammad Rokhan      | 37       |
| 40                   | Shaukat All Khain       | Muhanimad Habib      | 38       |
| 41                   | Nalk Zada<br>Shah Karim | Muhammad Zada        | 39       |
| 42                   | Aziz Khan               | Bacha Muhammad       | 40       |
|                      | 1 7 MAG. [AHeH]         | Sald Muhammad Khan   | 41       |

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|-----------------------------|---|---|-----------------|
| 43                          | Noor Rahman   | Kamin Khan<br>Ghulam Flaidar  | 43              |
| 44                          | Ghani Rahman  | ·   |                 |
| 45                          | Sher Afzal  | Amir Sher Ali Khan  | 45              |
| 46                          | Muhammad Hussin   | Muhaifuddin<br>Gul Hakim  | <u>46</u><br>47 |
| 47                          | Salim Zada  | with the state of | 48              |
| 48                          | Muhammad Rasool   | Abdul Sattar  | 49              |
| . 49                        | Ali Khan  | Alder Khan<br>Khan Said   | 50              |
| 50                          | Alam Said   | Musleh Uddin  | 51              |
| 51                          | Naseer uddlin   | Abdullah Khan   | 52              |
| 52                          | Shakir Ullah<br>Hussain Shah  | Mian Rahim Shah   | 53              |
| 53<br>54                    | Musafar Khan  | Shaibar Khan  | 54              |
| 55                          | Behram  | Mhammad Khan  | 55              |
| <u>56</u>                   | Khanzad Gul   | Khanzada  | 56              |
| 57                          | Niamat Ullah  | Gui Habib Khan  | 57              |
| <u>57</u>                   | Shah Jee  | Ahmad Khan  | 58<br>59        |
| 59                          | Saddam Hussain  | Bakht Zada  | 60              |
| 60                          | Qadar Gul   | Hazrat Gul  | 61              |
| 61                          | Wazir Zada  | Muhammad Rafeeg Gul Mateen  | 62              |
| 62                          | Muhammad Ghafoor  | Hisab Gul   | 63              |
| 63                          | Wazir Zada  | Abdul Raziq   | 64              |
| 64                          | Amir Muhammad Tariq Khan  | Habib ur Rahman   | 65              |
| 65                          | Fazal Nawab   | Fazal Bari  | 66              |
| 67                          | Gul Karim   | Gul Wali  | 67<br>68        |
| 68                          | Fazal Karim   | Bahre Rawan   | 69              |
| 69                          | Alam Zeb  | Said Faqir<br>Taaj Muhammad Khan  | 70              |
| 70                          | Ashraf Khari  | Gul Zada  | 71              |
| 71                          | Mansoor Akhtar  | Gran Bacha  | 72              |
| $\frac{72}{79}$             | Imran Khan<br>Tauheed Ullah   | Umar Zada   | 73              |
| 73                          | Rahat Gul   | Nasib Gul   | 74              |
| $-\frac{74}{75}$            | Saleem Khan   | Wazir Khan  | 75              |
| 76                          | Akhtar Hussain  | Gul Mar Din   | 76 ·            |
| 77                          | Babo Zaman  | Musamin Khan Toor Jan   | 79              |
| 78                          | Sultan  | Fazal Khaliq  | 80              |
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### Secretary to Govt. of Khyber Pakhtunkhwa Home & Tribal Affairs, Department

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2. Accountant General, Khyber Pakhtunkhwa, Peshawar. 3.

The Provincial Police Officer, Khyber Pakhtunkhwa.

45 The Regional Police Officer, Malakand.

The District Police Officer, Dir Lower. 5.

The District Accounts Officer, Dir Lower. 6.

PS to Home Secretary, Khyber Pakhtunkhwa.

SECTION OFFICER (BUDGET)