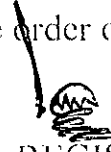


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - \_\_\_\_\_

794/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/04/2023	<p>The appeal of Mr. Khurshid Alam presented today by Mr. Muhammad Yaseen Hassan Khelvi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel to date the fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. 796 /2023  
Khurshid Alam (ASI)

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa & others.

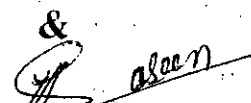
**INDEX**

S.No.	Description of documents	Annex	Pages
1	Memo of Appeal and Affidavit		1-4
2	Address of Parties		5
3	Copy of Appointment Order dated 18.01.2016	A	6-7
4	Copy of Regularization order dated 14-06-2022	B	8
5	Copy of F.I.R	C	9
6	Copies of Medical Summary/Discharge Slips	D & E	10-11
7	Copy of Application & Order Dated 02-02-2023	F & G	12-13
8	Copy of Departmental Appeal and Order Dated 08-03-2023	H & I	14-15
9	Copy of Minutes Dated 19-10-2022	J	16
10	Copy of Standing Order No 01/2016	K	17-18
11	Wakalatnama		19

Dated 06-03-2023.

  
Appellant

Through: **Muhammad Amin Khattak Lachi**  
**Advocate, Supreme Court.**

  
**Muhammad Yaseen Hassankhelvi**  
**Advocate, High Court.**

①

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. 794 2023.

Khurshid Alam (ASI) S/o Khurshid R/o Zahor ul Islam Road, C.I.A  
Chaoki, Kohat Cantt, Tehsil & District, Kohat.

.....APPELLANT.

**VERSUS**

1. Inspector General of Police Khyber Pakhtunkhwa, Central  
Police Office, Peshawar.
2. Assistant Inspector General of Police, Training, Khyber  
Pakhtunkhwa, Central Police Office, Peshawar.
3. Regional Police Officer Kohat.
4. District Police Officer Kohat.

..... RESPONDENTS.

**APPEAL UNDER SECTION 04 OF The KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 READ  
WITH RELAVANT RULES AND ENABLING LAWS AGAINST  
THE ORDER OF RESPONDENTS NO. 02 & 03 DATED 08-03-  
2023& 02-02-2023 WHEREBY EXEMPTION FROM BASIC  
ELITE COURSE ON PHYSICAL DEFORMITY HAS NOT BEEN  
CONSIDERED/ REGRETTEED**

**PRAYER IN APPEAL: -**

On acceptance of instant appeal, the  
Impugned Orders dated 08-03-2023 & 02-02-2023 may  
kindly be set aside and the appellant may please be  
Exempted from Basic Elite Course on Physical Deformity  
in accordance to Standing Order 01/2016.

**Respectfully Sheweth:**

**F A C T S**

1. That the Appellant was appointed as PASI (BPS-09) under Quota  
reserved for the children of Shaheed Police Officers dated 18-01-  
2016 in District Kohat. (Copy of Appointment Order is Annexed  
as A).

2

2. That the appellant performed his duties to the utmost of his abilities and entire satisfaction of his superiors and thus regularized vide order No 8778-84/EC, dated 14-06-2022. **(Copy of order dated 14-06-2022 is Annexed as B)**
3. That during this period the appellant Completed required trainings i.e. A, B, C & D at Police Training College Hangu in the year of 2017/2018.
4. That the appellant while on routine patrol was attacked by unknown Assailants / Terrorists at Main Bazar Thakht-e-Nasrati and as a result sustained firearm injuries. **(Copy of F.I.R is Annexed as C)**
5. That the Appellant got two surgeries of Exploratory Laparotomy & Colostomy Reversal, respectively. **(Copies of Medical Summary/Discharge Slips are annexed as D & E).**
6. That the Appellant being qualified submitted an application to Respondent No.02, for inclusion of his name in the seniority list for Elite Course which has been regretted with the observation that the Appellant must undergo Elite Course otherwise he may not be considered for inclusion of promotion list "E". **(Copy of Application & Order Dated 02-02-2023 is Annexed as F & G).**
7. That against the Order dated 02-02-2023 the appellant submitted departmental appeal to the Respondent No.02 which has been turned down/ regretted vide order dated 08-03-2023. **(Copies of Appeal and Order Dated 08-03-2023 are Annexed as H & I)**
8. That now the Appellant being aggrieved from the impugned Order approaches this Honorable Tribunal for redressal of his grievances inter-alia on the following ground: -

## **G R O U N D S**

- I. That the impugned orders dated 08-03-2023 & 02-02-2023 of Respondents No. 02 & 03 are wrong, illegal, unfounded, unconstitutional, based on nepotism and favoritism, hence, is liable to be set aside.
- II. That the impugned Orders of Respondents are in sheer violation of the Fundamental Rights guaranteed to the Appellant as envisaged under the Constitution of Islamic Republic of Pakistan 1973.

- III. That the Appellant has not been treated in accordance with law and rules by the Respondents on the subject noted above and as such the Respondents violated Article 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan 1973.
- IV. That the Regional Medical Board in its meeting dated 19-10-2022 has recommended that according to Standing Order 01/2016 the appellant may be exempted from the mandatory Elite Course and with further request that extra light courses in lieu of his exemption may be arranged.  
**(Copy of minutes Dated 19-10-2022 is Annexed as J)**
- V. That According to "Standing Order 01/2016" Clause 04 Major Physical Deformity any Police officer who suffers from any disability which causes hindrance in the discharge of official duties e.g. loss of eyesight or hearing suffering from heart disease, loss of limb or any major organ will be entitled for exemption from physical training but such officers shall undergo extra courses in lieu of the exemption from physical training subject to the approval of a regional board to be chaired by the concerned region police officer and consisting of medical superintendent of district headquarters and head of Unit" the appellant is fully eligible to be treated in terms of the Standing Order. **(Copy of Standing Order No 01/2016 is annexed as K)**
- VI. That the impugned orders are violation of the standing order 01/2016 and the appellant has been deprived from its fruits just for no reasons.
- VII. That the impugned orders are based on surmises and conjectures, and the same has been passed in slipshod manners.
- VIII. That any other ground will be adduced at the time of arguments with the kind permission of this Honorable Tribunal.

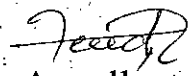
**It is therefore, most respectfully, prayed that on acceptance of instant appeal:**

- i. **The Impugned Orders dated 08-03-2023 & 02-02-2023 may kindly be set aside and the appellant may please be Exempted from Basic Elite Course on**

4

**Physical Deformity in accordance to Standing Order 01/2016.**

- ii. **Any other relief not specifically prayed for, to which the Appellant is entitled in the facts and circumstances of the case may also be granted.**

  
Appellant

Through

**Muhammad Amin Khattak Lachi**

**Advocate Supreme Court**

&

  
**Muhammad Yaseen Hassan Khelvi**

**Advocate High Court**

**AFFIDAVIT**

I, **Khurshid Alam** (ASI) S/o Khurshid R/o Zahor ul Islam Road, C.I.A Chaoki, Kohat Cantt, Tehsil & District, Kohat, do hereby affirm and declare on oath that the contents of the instant Appeal are true and correct to the best of my knowledge and belief.

  
**Deponent**

5

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2023.

Khurshid Alam (ASI)

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa & others

**ADDRESSES OF PARTIES**

**Appellant:**

Khurshid Alam (ASI) S/o Khurshid R/o Zahor ul Islam Road, C.I.A  
Chaoki, Kohat Cantt, Tehsil & District, Kohat.

**Respondents:**

- A. Inspector General of Police Khyber Pakhtunkhwa, Central  
Police Office, Peshawar.
- B. Assistant Inspector General of Police Legal, Khyber  
Pakhtunkhwa, Central Police Office, Peshawar.
- C. Regional Police Officer Kohat.
- D. District Police Officer Kohat.

**Through:**

  
**Appellant**

**Muhammad Amin Khattak Lachi**

**Advocate, Supreme Court.**

&   
**Muhammad Yaseen Hassan Khelvi**

**Advocates, High Courts.**



Annex-A

6

OFFICE OF THE  
REGIONAL POLICE OFFICER  
KOHAT REGION

ORDER

Consequent upon creation of supernumerary posts of PASIs BPS-09 vide Finance Department Letter No. SO(Budget)/HD/15-02/2014, dated 16.09.2015 and approved by the Inspector General of Police, Khyber Pakhtunkhwa Peshawar vide Letter No. 8905-8935/A-3, dated 17.09.2015, the following Constables / candidates of this Region are hereby appointed / absorbed as PASIs (BPS-09) for ward of Police Shuhada purely on temporary basis subject to the condition that on creation of permanent / regular posts as per ratio of Shuhada quota under Police Order 2002, the senior most of the supernumerary post will be adjusted against the post falls vacant, with immediate effect.

They are temporarily appointed and their appointment is subject to verification of their educational certificates / degrees and that in case their educational documents were found forged, criminal case would be registered against appointee besides forthwith dismissal. Their appointment will be on temporarily basis subject to medical fitness and character verification and their seniority be fixed as per Standing Order No. 05/2014 at Para No. 08 issued vide Inspector General of Police, Khyber Pakhtunkhwa Letter No. 364-427/CO dated 12.09.2014:-

S.No.	Name with Father / brother name	Date of Shahadat	Number Allotted
1.	Tariq Waheed s/o Shaheed FC Waheed Zaman r/o Near Govt. High School Kaghazai Kohat	24.08.1996	1.
2.	FC Muhammad Hanif s/o Imran Ali b/o Shaheed FC Roshan Ali 707 r/o Lodhi Khel Hangu.	03.06.2000	2.
3.	Shan Ali s/o Shaheed FC Azmat Ali r/o Lodhi Khel Hangu	04.04.2002	3.
4.	Muhammad Afaq s/o Shaheed FC Eid Rehman 167 r/o Vill: Topi Kalay Bogara district Karak	22.04.2003	4.
5.	FC Syed Gulshan Abbass No. 1200 s/o Syed Ghani Abbas b/o Shaheed Const: Mir Akbar Hussain No. 707 r/o Moh: Syedan Esa Khel Kachai Kohat	02.01.2004	5.
6.	Wahid Ullah s/o Shaheed ASI Shafi Ullah r/o Moh: Rangeen Khel Takht-e-Nasrati Karak	29.06.2004	6.
7.	FC Tasawar Hussain b/o FC Nihad. Hussain 1109 r/o Usterzai Bala Kohat	29.07.2007	7.
8.	Alla Ullah b/o Shaheed FC Muzammil Shah r/o Adam Khel Banda Hangu	21.09.2008	8.
9.	Muhammad Iqbal s/o Shaheed FC Sartaj Muhammad r/o Sharif Wala Latamber Tehsil & district Karak	29.09.2008	9.
10.	FC Waseem Akram s/o Shaheed Const: Hassan Mehmood No. 609 r/o Kaghazai Kohat	06.12.2008	10.
11.	FC Sana Ullah No. 400 s/o ASI Muhammad Ishaq r/ Koly Kalay Tehsil & district Karak	25.09.2009	11.
12.	Alif Ullah s/o Shaheed ASI Bakhtawar Shah r/o Sida Din Banda Tehsil & district Karak	28.05.2009	12.



Annex-A

13.	FC Muhammad Irfan s/o Abdul Habib b/o FC Ajab Khan No. 1065 r/o Baora Ghari Billitang Kohat	06.09.2009	13.
14.	Khurshid Alam s/o Shaheed DFC Khurshid Ahmad r/o Zahoor Islain Road CIA Chowki Kohat Cantt	05.10.2009	14.
15.	Muhammad Anwar b/o Shaheed FC Muhammad Riaz r/o Moh Ashraf Khel Takht-e-Nasrati, Karak	27.02.2010	15.
16.	FC Muhammad Irfan Shah s/o Shaheed DSP Farid Khan r/o Zarin Kalay district Karak		16.
17.	LHC Shaheed Ullah s/o Khadar Khan b/o Shaheed Const: Raqeeb Ullah r/o Vill: Mohrabi Banda, Tekht-e-Nasrati Karak	09.04.2010	17.
18.	Shehryar Khan s/o Shaheed FC Sabaz Ali Khan r/o Police Lines Family quarter Hangu Road Kohat	26.01.2011	18.
19.	Sohail Ahmed s/o Shaheed Si Arif Hussain r/o Hoti Banda, Banda Daud Shah PO Khurran, Karak.	05.12.2011	19.
20.	Adeel Salah-ud-Din b/o Shaheed FC Adil Salah-ud-Din r/o House No. T-337 Chowk Charagh Shah Moh: Mian Khel Kohat City	07.02.2011	20.
21.	Umer Nawaz s/o Khial Nawaz b/o Shaheed LHC Habib Nawaz r/o Tarkha Kio, Tehsil & district Karak	02.02.2012	21.
22.	FC Zafran s/o Shaheed Insp: Arman Gul r/o Sirat Khel, Tehsil & district Karak	24.04.2012	22.
23.	Sher Andaz s/o Shaheed Insp: Sattar Khan r/o Vill: Behran Khel, Teh. Takht-e-Nasrati, district Karak	08.07.2012	23.
24.	Umer Zahid s/o Musharrat Khan b/o Shaheed FC Ashraf Zahid r/o Dagar Nari Tehsil B.D.Shah, district Karak	22.12.2012	24.
25.	FC Shaheen Ullah s/o Khadar Khan b/o Shaheed FC Rasheed Ullah r/o Shahu Khel, Tehsil & district Hangu	25.04.2013	25.
26.	Muhammad Zafran s/o Shaheed FC Sher Ayaz r/o Umer Din Kalay Tehsil Tekht-e-Nasrati district Karak	07.02.2014	26.

(DR. ISHTIAQ AHMAD MARWAT)  
Regional Police Officer,  
Kohat Region

No. 566-76 JEC, dt: 18.8.2016.

Copy of above is submitted to the Inspector General of Police, Khyber Pakhtunkhwa Peshawar for favour of information w/r to his office Memo: mentioned above please.

2. District Police Officer, Kohat.
  3. District Police Officer, Karak
  4. District Police Officer, Hangu
  5. All Heads of Investigation, Kohat Region.
  6. District Accounts Officers, Kohat, Karak & Hangu.
  7. Confidential Clerk Region Office
- Necessary gazette notification may be issued accordingly

(DR. ISHTIAQ AHMAD MARWAT)  
Regional Police Officer,  
Kohat Region

Annex-B

(8)



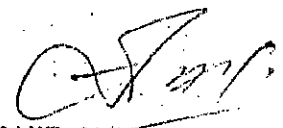
**OFFICE OF THE  
REGIONAL POLICE OFFICER,  
KOHAT REGION**

E-mail: ecregionofficekohat@gmail.com, Phone: No. 0922-9260115, Fax No. 0922-9260114

**ORDER.**

Consequent upon the occurrence of vacancies in 05% reserved quota fixed for Shuhada sons / brothers, the following supernumerary TASIs of Kohat Region Police are hereby regularized as Probationer ASIs against 05% quota under Police Rules 12.2 & 13.18 and allotted new Range Nos. as noted against each, with immediate effect.


S.No.	Name of official	Present Posting	New Range No.
1.	T/ASI Umer Nawaz	Karak district	46/K
2.	T/ASI Muhammad Anwar	Karak district	105/K
3.	T/ASI Zafran	Karak district	265/K
4.	T/ASI Khurshid Alam	Kohat district	266/K

  
(TAHIR AYUB KHAN) PSP  
Regional Police Officer,  
Kohat Region.

No. 8778-84 /EC, dated Kohat the 14-6-2022.

Copy of above is submitted to the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar for favour of information please.

1. All the District Police Officers, Kohat Region.
2. Confidential Clerk, Region Office, Kohat.

  
(TAHIR AYUB KHAN) PSP  
Regional Police Officer,  
Kohat Region.

تاریخ وقت و قومیہ 28/4/2008 وقت 22:00

تاریخ وقت رپورٹ 28/4/2008 وقت 22:00 بج جاگیدگی پریم	تاریخ وقت 28/4/2008 وقت 22:00
نام و سکونت اطلاع دہندہ مستفیث اسلام فور آسی مقامہ یعقوب خان شہید منظم کر کے	0333-9643501
تقریبیت پریم (مدد لہ) حال اگر کچھ لیا گیا ہو۔	14202-1348267-3
بات و آواز فاسد تھا نہ ت اور دست پر مول لوٹتے نظر شکسی سسٹم	اپر 324-353-421-7ATA-34
نام و سکونت ملزم	بین بوڈ بازار عین نعمت نظامیہ 1/ انار اڈنگ جانب شمال از قمانہ
کارروائی جو پیش ہے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	پرسیدگی و سزا سے پرہیز یا جاننا ہے
تھانہ سے روانگی کی تاریخ و وقت	بطور سسٹل رپورٹ

ابتدائی اطلاع نیچے درج کرو۔ اس وقت تک تحریری طور پر اسلام فور آسی مقامہ یعقوب خان شہید پر دست نشین عبدالقادر 5070 کو مول لوٹتے نظر مستفیث درجہ زلیہ ہے۔ آفیسر خارج مقامہ CID کو باٹ امریز میں وفد فور شہداء عالم Pasi بعد نشیمن اور سلطان 5074 و عبدالقادر 5070 مسواری گاڑی سے گاڑی 34989 میل ڈرائیور فور ملی 865 گشت نشین ڈرائیور کے ہوتے وقت وقوعہ بمشام بالا ناگہ بندی پر مول ہوئے تھے کہ اس دوران ایک موٹر سائیکل ہڈ 155 جانب دنگی سراج خیل آئی ہو اجن پر دو فور جوان اسم مکن ٹھکانا سوار تھے روڈ سولر سسٹم لڈنگ روشنی ان تھی موٹر سائیکل سوار کو بغرض خیلنگ روکنے کا اشارہ دیکر یہ روکنے کے ہم پوریس بارٹی پر بار بار وہ متعلق فائرنگ شروع ہو گئی فائرنگ سے فور شہداء عالم Pasi وقت پر گنگ کر شدید زخمی ہوا اور مسواری گاڑی کو بھی سامنے بانٹ پر گولی لگ کر زخمی ہوا اور سوار پریشیم پوریس بارٹی نے حق حفاظت خود احتیاری کی خاطر جو ابی فائرنگ کی مگر یہ روڈ دھشتگرد موٹر سائیکل پر سترہ سے لکل کر اندھیری بڑی آبادی میں رفلو چکر ہوئے ہم پوریس بارٹی ملزساں کو سامنے آنے پر شناخت کر سکتے ہیں۔ یہ روڈ ٹھکانا ملزساں کا فعل دھشتگردانہ ہے۔ مورخ Pasi کا نقشہ ملزساں کے زیر حفاظت نشین لیب خان 5074 سولر سسٹل تحت کونڈی بھوڑا ڈو۔ مورخ رپورٹ سے معلوم ہوا کہ بالائے ما کر فور اسلام فور مقامہ بطور سسٹل رپورٹ دست نشین عبدالقادر 5070 مقامہ CID کو باٹ ارسال بقمانہ ہے۔ اس دوران بالا کو اطلاع دی گئی۔ جائے وقوعہ کی حفاظت مناسب گارد کی بندوبست کی گئی فور اسلام فور مقامہ کو فور شہداء عالم Pasi سے دستخط و انگیزی اسلام فور آسی مقامہ یعقوب خان شہید مورخ 28/4 کارروائی مقامہ آمدہ فور اسلام فور مورخ درجہ زلیہ کریم جہ براج بالا جاگ ہو کر نقل پریم مدد سے اسلام فور لکشن انسپکٹر مسواری فور لکشن مورخ CID کو باٹ رجسٹر 03063810488 لگا جاتا ہے۔

پرسیدگی و سزا سے پرہیز یا جاننا ہے  
بطور سسٹل رپورٹ

Annex D

(10)



LADY READING HOSPITAL  
MEDICAL TEACHING INSTITUTION  
PESHAWAR, KP

Patient Identification

Khawshed Alam  
30 yrs  
MSCW

MR No-2673739

DISCHARGE SUMMARY

DOW

Attending Physician: Dr. Waqar Alam Jan

Clinical Service: SCW

Date of Admission: 29/04/18

Date of Discharge: 10-05-18

Secondary Diagnosis (es): FAI

Procedures / Operations: exploratory laprotomy

Consultation:

Brief History & Hospital

Findings:- <sup>extra</sup> Bladder injury

Rectal injury 7cm from anal verge

Procedures - extra bladder repaired w/ vicryl  
2/0 in two layers sigmoid colostomy formed  
Abdomen closed ASD done

Discharge Medication:

Tasycin 500mg 1+1 QD

Tas Voltal 500mg 1+1 QD

Cap Ruling 400mg QD

Activity & Dietary Instruction:

Daily Dressing

Follow-up Instruction:

Refer to urology for opinion

Nurse:

Signature

Doctor:

Signature

I have read and understand the given instructions.

Patient / Responsible Person's (Name

) Signature

Discharge summary

Annex E (11)



LADY READING HOSPITAL  
MEDICAL TEACHING INSTITUTION  
PESHAWAR, KP

Patient Identification

Dr. Khurshid Alam  
MSB- 833/93  
CR# 2890905

DISCHARGE SUMMARY

Attending Physician:

Clinical Service:

MSB ward

Date of Admission:

23/7/18

Date of Discharge:

30/7/18

Secondary Diagnosis (es):

Celestomy recessed

Procedures / Operations:

Celestomy recessed

Consultation:

Pinelings Dense Adhesion

Brief History & Hospital

loop Celestomy

• Tab cycin 500mg

1+1 - 1/0/18

Discharge Medication:

• Tab Plaggl 400mg

1+1+1 1/0/18

• Tab Riserk 20mg

1+1+1 1/0/18

Activity & Dietary Instruction:

• Tab Uxeren

1+1+1 1/0/18

Nurse:

[Signature]

Signature

Doctor:

[Signature]

Signature

I have read and understand the given instructions.

Patient / Responsible Person's (Name)

Signature

[Signature]

Discharge summary

Annex-F

12  
PB

جناب عالی!

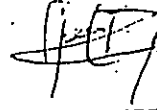
درخواست مابہت شامل کرنے سے نمبرائی لسٹ EC 13680-84 محررہ 19-09-2022

مؤدبانہ گزارش ہے کہ سائل اپنے کو لیگ سے نمبرائی لسٹ "E" سے رو چکا ہے۔ جبکہ سائل پروٹیشن کورس میں ماسوائے Elite Tactial کورس۔ جو کہ سائل ڈسٹرکٹ کرک میں بدوران گشت دشمن عناصر کے نائزنگ سے لگ کر زخمی ہوا تھا۔ جو کہ FIR نمبری تھا۔ تخت نھرتی کرک روز ہے۔ سائل کا والد صاحب پولیس سٹیشن صدر کے دھماکہ میں شہید ہوا تھا۔ (کامل فتوا ات لف ہیں)

لینڈ ایڈریس درخواست استدعا ہے کہ سائل کو S.O 01/2016 برطانیہ اس کورس سے Accept کیا جائے۔ اور اپنے کو لیگ کے ساتھ لسٹ "E" پر شامل کرنے کا حکم صادر فرمائیں۔ (شوقینٹ ہمراہ لف ہے)  
عین نوازش ہوگی

22-09-2022 مورخہ

عریضہ  
آپ کا تاجدار خورشید عالم PASI



دستخط

Annex - G

Phone No: 9260112.  
Fax No: 9260114.

102

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From: -

The Regional Police Officer,  
Kohat Region, Kohat.

To: -

The District Police Officer, Kohat.

No. 1651 /EC, Dated Kohat the 2 / 12 /2023.

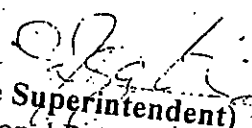
Subject: -

APPLICATION.

MEMO:

I am directed to refer to your office Memo: No. 889/SRC, dated .01.2023 on the subject quoted above and to state that the Worthy RPO Kohat has recorded the following remarks:-

"Why should he not undergo Elite Course? He must undergo Elite Course otherwise must not be considered for inclusion in promotion list 'E'. How can Police department afford to entertain disabled?"

  
(Office Superintendent)  
For Regional Police Officer,  
Kohat Region

Annex-A

(۱۶)

DIRECT

بھجھور جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ  
عنوان :- پروموشن لسٹ میں نام ڈالنے کا حکم صادر فرمائی جاوے۔

نائب عالی!

سائل ذیل عرض رساں ہیں۔

- من سائل شہید بابہ کا بیٹا ہے اور سال 2016 میں بحیثیت PASI بھرتی شدہ ہے۔
- شہید بابہ کے نقشہ قدم پر چلتے ہوئے تھانہ تخت نصرتی ضلع کر کے میں سماج دشمن عناصر کے ساتھ مقابلہ کر کے فائرنگ کے نتیجے میں زخمی ہو کر عرصہ تقریباً 2 سال تک زیر علاج رہا۔ (نقل FIR ہمراہ لف ہے)
- من PASI کی ایلینٹ کورس میں سلیکشن ہونے پر برطانیہ سینڈنگ آرڈر نمبر 01 سال 2016 جناب DIG صاحب کوہاٹ کی سربراہی میں میڈیکل بورڈ تشکیل ہو کر جس میں DPO صاحب کوہاٹ اور میڈیکل آفیسر DHQ ہسپتال کوہاٹ ممبران تھے جنہوں نے من PASI کی جسمانی معائنہ کر کے مشکل ایکس راز اور سخت کام کرنے کے لئے فٹ نہ ہونا تحریر کیا ہے۔
- اب تو نہ مجھے دیگر Light کورسز کے لئے سلیکشن ہوئی اور نہ ہی پروموشن لسٹ E میں شامل کیا جا رہا ہے۔

لہذا ابذریعہ درخواست استدعا ہے کہ من سائل اور والد صاحب کی قربانی کو نظر انداز کر کے نا انصافی نہ کی جائے اور مجھے اپنے دیگر کولیکس کے ساتھ پروموشن لسٹ E میں میرا نام شامل کیا جاوے۔

مہربانی ہوگی۔

العارض

مورخہ 20-01-2023

عزیز عالم PASI مجیدہ چوکی تحصیل گیت تھانہ ٹی ضلع کوہاٹ





Annex-1

(15)

DIRECTORATE OF TRAINING  
CENTRAL POLICE OFFICE  
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 1155 /P/ dated 08.03.2023 Phone No. 021-9210941 Fax No. 9211318

To: The Registrar,  
CPO Khyber Pakhtunkhwa,  
Peshawar.

Subject: MINUTES OF THE REGIONAL MEDICAL BOARD  
Memo:

Please refer to your office letter No.2068/E-III dated 10.11.2022 & No.245/E-III dated 20.02.2023 on the subject captioned above.

After perusal, the Competent Authority has filed the said case with remarks "*the case is not under the purview of section-4 of Standing Order No.01/2016, hence filed*".

(Dr. Quraish Khan) PSP, PhD  
Assistant Inspector General of Police,  
Training, Khyber Pakhtunkhwa

Encls: No. & date even.

Copy of above is forwarded for information and necessary action to the:-

1. Deputy Inspector General of Police, Training Khyber Pakhtunkhwa Peshawar.
2. RPO Kohat w/c to his office letter 15131/EC dated 19.10.2023.

Annex-1

Better Copy

(15)

**DIRECTORATE OF TRAINING  
CENTRAL POLICE OFFICE  
KHYBER PAKHTUNKHWA, PESHAWAR**

1655/Trg: Dated 08/03/2023,

Phone No, 091-9210941, Fax No, 9211208

To

The Registrar,  
CPO Khyber Pakhtunkhwa,  
Peshawar.

Subject: **MINUTES OF THE REGIONAL MEDICAL BOARD**

Memo:

Please refer to your office letter No.2068/E-III dated 10.11.2022 & No.245/E-III dated 20.02.2023 on the subject captioned above.

After perusal, the competent Authority has filed the said case with remarks "the case is not under the purview of section-4 of Standing Order No. 01/2016, hence filed".

(Dr. Quraish Khan) PSP, PhD

Assistant Inspector General of Police,

Training, Khyber Pakhtunkhwa

Endst: No. & date even.

Copy of above is forwarded for information and necessary action to the:-

1. Deputy Inspector General of Police, Training Khyber Pakhtunkhwa Peshawar.
2. RPO Kohat w/r to his office letter 15131/EC dated 19.10.2022.

Annex-J (16)

Phone No: 9260112.  
Fax No: 9260114.

From: - The Regional Police Officer,  
Kohat Region, Kohat.

To: - The Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

No. \_\_\_\_\_ /EC, Dated Kohat the 15/10/2022.

Subject: - MINUTES OF THE REGIONAL MEDICAL BOARD.

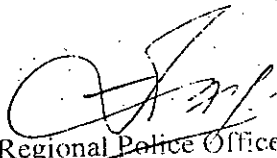
MEMO:

It is submitted that PASIs have to qualify Basic Mandatory Elite Course as per Standing Order No. 10/2014 prior to their confirmation as ASIs.

In this behalf, PAsi Khurshid Alam preferred application for his exemption from the said course as per Standing Order No. 01/2016 upon which Regional Medical Board was constituted and meeting was held today on 18.10.2022 at 1100 hrs. minutes of which are enclosed.

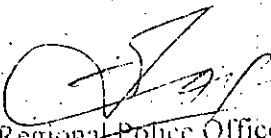
According to Standing Order ibid, an official who is exempted from the Elite Course will undergo extra light courses in lieu of his exemption, however, detail of such courses is not mentioned in Standing Order No. 01/2016.

It is, therefore, requested that extra light courses may kindly be conveyed to this office to proceed further into the matter, please.

  
Regional Police Officer,  
Kohat Region

No. 15/32 /EC,

Copy to Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar for information, please.

  
Regional Police Officer,  
Kohat Region



Annex - K

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OFFICE OF THE  
THE INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar

STANDING ORDER NO. c1 /2016

Exemption of Injured Police Personnel from Training

This Standing Order is issued under Article 10(3) of Police Order 2002 and in pursuance of the decision made in 18<sup>th</sup> meeting of Police Policy Board held on 13<sup>th</sup> August 2015 and the recommendations of the committee constituted on the subject matter.

2. **Aim:-** A number of Police Officers who sustain injuries either during training program or in the line of duty are unable to continue or undertake the compulsory and mandatory training required under the Rules in various Police Training Institutions which impedes their promotion to the next higher rank. In order to ensure timely promotions of such officers it is essential that necessary exemptions from training be allowed to such injured Police personnel.
3. **Minor/temporary Physical deformity:-** Any Police Officer who suffers from minor/temporary injury e.g. weak eyesight, partial hearing loss, broken finger etc which does not become a hindrance in performing duties and shall not be based for exemption from physical training.
4. **Major Physical Deformity:-** Any Police Officer who suffer from any disability which causes hindrance in the discharge of official duties e.g. loss of eyesight or hearing suffering from heart disease, loss of limb or any major organ will be entitled for exemption from physical training but such officers shall undergo extra courses in lieu of the exemption from physical training subject to the approval of a Regional Board to be chaired by the concerned Region Police Officer and consisting of Medical Superintendent of District Headquarters and Head of the Unit.
5. **Permanent Deformity during Training:-** Any Police Officer who suffers any serious disability during training and is unable to continue training will be exempted from training and will be considered to have qualified the ongoing training subject to the condition that he will qualify the theoretical aspects of training. Such officers will be deployed on light duty/office works in their respective Units.

Annex-K

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E

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6. **Functions of the Board: -**

6.1:- To meet the requirements of Clause-4 ibid the following Boards will be constituted:

i). Regional Board as contemplated under Clause-4 ibid.

ii). Central Board at CPO headed by the Additional Inspector General of Police Headquarters and consisting of DIG Training and Medical Superintendent of Services Hospital to hear and decide appeals against the Regional Boards.

6.2. Any officer who wants exemption from any aspect of training on the basis of any disability or injury will apply to the concerned Head of Unit, who will refer the same to the Regional Police Officer for calling a meeting of the Board for consideration of the prayer of applicant.

6.3. If an officer suffers any injury during training, then the Principal of the Training Institute will inform the concerned Head of Unit, who will forward the case to the Regional Board for recommendations.

6.4. Any person aggrieved of the decision of the Regional Board may prefer appeal before the Central Board at the CPO whose recommendations will be final.

7. **Power to remove difficulties:-** If any difficulty arises in giving effect to this order, the Provincial Police Officer may, by Notification, make such provisions as deemed appropriate.

8. **Amendment:-** All previous orders on the subject, to the extent of the provisions of this order, shall stand amended.

(NASIR KHAN DURRANI)  
Inspector General of Police,  
Khyber Pakhtunkhwa Peshawar

No:- 149-225/143 dated Peshawar the 25 January 2016

Copy of the above is forwarded for information and necessary action to:

1. All Heads of Police Offices in Khyber Pakhtunkhwa;
2. PRO to PPO;
3. Registrar CPO.

No 1306-10/05 dt 25/01/16  
copy to all SDPOs SRE,

and OIC for ensuro compliance (Muhammad Alam Shinwari) PSP  
DIG Headquarters  
Khyber Pakhtunkhwa Peshawar

827  
28/1/16



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**BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR.**

**WAKALATNAMA**

Khurshid Alam (ASI)

(Applicant)  
(Appellant)

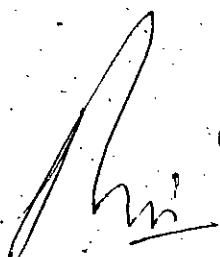
**VERSUS**

Inspector General of Police K.P

(Respondents)  
(Defendants)

I/We, Appellant in the above noted Appeal, do hereby appoint and constitute, **Muhammad Amin Khattak Lachi ASC & M. Yaseen HassanKhelvi Advocate High Court**, to appear, plead, act, compromise, withdraw or refer to arbitration to me/us as my/our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

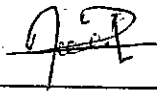
**ACCEPTED**



**Muhammad Amin Khattak Lachi.**

Advocate, Supreme Court of Pakistan.

**CLIENT (S)**



**M. Yaseen HassanKhelvi**



Advocate High Court.

0345-4949553.

Yaseenhasankhelvi6@gmail.com.