

09th March, 2023

Junior of learned counsel for the appellant present.
Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate
General for the respondents present.

Junior of learned counsel for the appellant seeks
adjournment on the ground that learned counsel for the
appellant has proceeded to his native village due to some
domestic engagement. Adjourned. To come up for arguments
on 13.03.2023 before the D.B. Parcha Peshi given to the parties.



(Salah-ud-Din)
Member (J)




(Kalim Arshad Khan)
Chairman

13th March, 2023

Learned counsel for the appellant present. Mr. Asif
Masood Ali Shah, Deputy District Attorney for the respondents
present.

Learned counsel for the appellant seeks adjournment
being not prepared for arguments today. Adjourned. To come
up for arguments on 17.05.2023 before the D.B. Parcha Peshi
given to the parties.



(Salah-ud-Din)
Member (J)



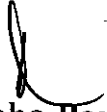
(Kalim Arshad Khan)
Chairman

SCANNED
Khan Painsdakhel
Peshi

1st Nov., 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General, for the respondents present.

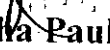
02. Learned counsel for the appellant requests for adjournment in order to further prepare the brief. Last opportunity is granted. To come up for arguments on 16.12.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

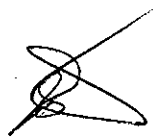
16th Dec. 2022

Appellant present in person. Mr. Naseerud Din Shah, Assistant Advocate General alongwith Fazle Mabood, Inspector (Legal) for the respondents present. Mrs. Rozina Rehman, learned Member (J) is on leave, therefore, D.B. is incomplete. The case is adjourned to 09.03.2023 for arguments before the D.B.


(Fareeha Paul)
Member(E)

SCANNED
KPST
Peshawar

23.11.2021 Proper D.B is not available, therefore, case is adjourned to 2 / 3 / 2022 for the same as before.


Reader

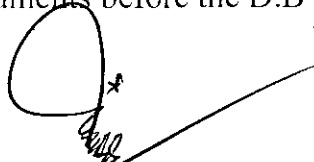
2-3-22

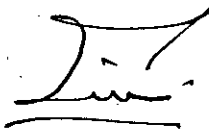
Due to retirement of the Honble Chairman the case is adjourned to come up for the same as before on 16-6-22


Reader

16.06.2022 Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.


Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 01.08.2022.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

1-8-2022

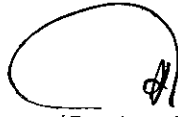
Proper DB not available the case is adjourned to 1-11-2022


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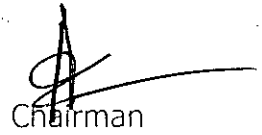
21.09.2021

Junior to counsel and Mr. Muhammad Riaz Khanm
Paindakhel, Asstt. AG alongwith Fazle Mabood, Inspector
(Legal) for the respondents present.

Learned counsel for the appellant is not in
attendance due to indisposition and request for
adjournment is made on his behalf. Request accorded.
To come up for arguments on 23.11.2021 before the
D.B.



(Rozina Rehman)
Member(Judicial)



Chairman

26.01.2021

Due to pandemic of Covid-19, the case is adjourned to 13.04.2021 for the same.


Reader

13.04.2021


Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 29.07.2021 for the same as before.

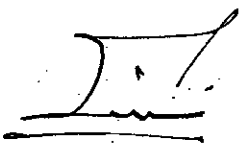

READER

29.07.2021

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Mr. Javed Ullah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments before the D.B on 21.09.2021.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

17.09.2020

Junior to counsel for the appellant and Addl. AG alongwith Tariq Umar, Inspector for the respondents present.

Representative of the respondents has furnished reply of the respondents which is made part of the record. Learned counsel states that Service Appeal No. 1525/2019 having similar proposition has been fixed for 09.11.2020. He requests that instant matter may also be clubbed with said appeal. To come up for arguments on 09.11.2020 alongwith appeal No. 1525/2019 before the D.B. The appellant may furnish rejoinder, within a fortnight, if so advised.

Chairman

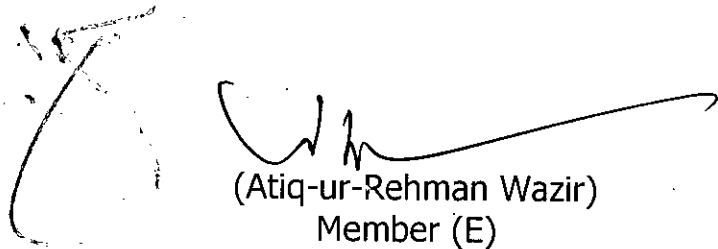


09.11.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Fazal Mabood Inspector for respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 26.01.2021 for hearing before the D.B.

Chairman



(Atiq-ur-Rehman Wazir)
Member (E)

15.07.2020

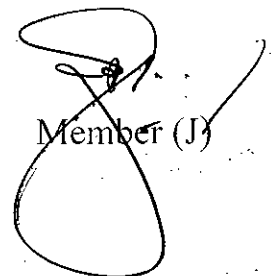
Counsel for the appellant present. Arguments heard and record perused.

Contends that various incentives were given to different categories of Instructors vide Standing Order No.11 dated 17.01.1987 which were later on validated through K.P Validation of Standing Order Act, 2005. The appellant being in top-05, was transferred under Standing Orders 11/1987 and 07/2003. He was promoted to the rank of ASI but the respondent No.1 issued the impugned notification on 10.01.2019 and ordered the withdrawal of Standing Order but later on vide order dated 17.01.2019, the notification dated 10.01.2019 was held in abeyance and as such the appellant was stated to have become entitled for confirmation to the rank of ASI, but respondents are not willing to implement their own order.

Points raised need consideration. Similar appeal No.1528 has already been admitted to regular hearing. As such the instant appeal stands admitted to regular hearing subject to all legal exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 17.09.2020 before S.B.

Appellant Deposited
Security & Process Fee

15/7/20


Member (J)

Form- A

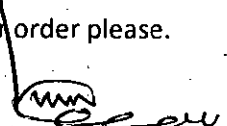

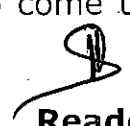
FORM OF ORDER SHEET

Court of _____

Case No.-

1282

/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/03/2020	<p>The appeal of Mr. Abidullah Khan presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p> REGISTRAR 2/3/2020</p>
2-	06/03/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17/04/2020</u></p> <p> MEMBER</p> <p>17.04.2020</p> <p>Due to public holiday on account of COVID-19, the case is adjourned to 15.07.2020 for the same. To come up for the same as before S.B.</p> <p> Reader</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR**

APPEAL NO. 1282 /2020

ABID ULLAH KHAN

VS

POLICE DEPTT:

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APPELLANT

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1282/2019

Mr. Abid Ullah Khan, Assistant Sub Inspector (BPS-11),
Cadet Law Instructor, Police Training Center, Hangu.

..... Appellant

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
- 2- The Additional Inspector General of Police (Establishment), Central Police Office, Khyber Pakhtunkhwa, Peshawar.
- 3- The Commandant Police Training Center/College, Hangu.

..... Respondents

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT IMPLEMENTING THE ORDER DATED 17.1.2019 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITH IN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the order dated 17.01.2019 may very kindly be implemented and the appellant may kindly be brought into promotion list- E w-e-f the date of arrival i.e. 20-11-2016 as Assistant Sub-Inspector. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

1. That appellant is performing his duty as instructor in the Police Training Center, Hangu and his service record in the PTC Hangu is up to the entire satisfaction of his superior officers.
2. That to make the PTC Hangu more successful and to make the finest officers of the Police willing to perform duty as Instructor, the Standing Order No.11 dated 17.01.1987 was issued, wherein various incentives were given to different categories of Instructors which are as under:

A) **H.C INSTRUCTOR:** Constable who are the holders of top five positions will be qualified to serve as H.C Instructors for three years and if during these three

years the earn "A" report they will be admitted to Intermediate School Course and their names will be placed in List-D after qualifying intermediate course.

B) **ASI INSTRUCTORS:** Head Constable who qualifies intermediate School Course, top five position holders will be qualified to serve as instructor for three years and if they earn category "A" report, they would be confirmed as ASI and would be placed in promotion list-E. Copy of the Standing Order No.11 dated 17-01-1987 is attached as annexure.....**A.**

3. That such incentives, mentioned in Standing Order No.11, were later on further clarified and slightly modified vide memo dated 01.10.1995, issued after approval of the then Police Chief. Similarly, vide Standing Order No. 7 of 2003 issued on 05.01.2004 by the then IGP after approval of Government under Article 10(3) of Police Order, 2002, granted the same incentives as mentioned in Standing Order No.11 of 1987. The Police Establishment also issued a Standing Order No.17 of 2014, whereby, the incentives for Lower School Course was also extended to Physical Training Instructors of PTC and Elite Training School. Copies of the memo dated 01-10-1995, the Standing Order No.7/2003 and Standing Order No. 17/2014 are attached as annexure**B,C&D.**
4. That the incentives provided in the Standing Order No.11 of 1987 were later on validated through an Act of Provincial Legislature, namely, K.P Validation of Standing Order Act, 2005 (KP Act No. IV of 2005). Thus rights of promotions and seniority accruing under Standing Order No.11 and all orders issued in pursuance to that Standing Order have been protected. Copy of the Act No. IV of 2005 is attached as annexure**E.**
5. That appellant being in top five in the intermediate college course in the term ending on 07.11.2016 was transferred and posted to PTC, Hangu under the Standing Orders No. 11/1987 and 07/2003 with immediate effect vide order dated 16-11-2016. Copy of the result dated 07-11-2016 and order dated 16-11-2016 are attached as annexure**F&G.**
6. That appellant submitted his arrival report to the concerned officials on 20-11-2016. Copy of the arrival report is attached as annexure.....**H.**
7. That appellant was promoted to the rank of Assistant Sub-Inspector (BPS-09) on the available vacancy of PTC Hangu from the date of his arrival i.e. 20-11-2016 as provided in the Standing Order No. 11/1987 and 07/2003 vide order dated 29-

11-2016. Copy of the Promotion Order dated 29-11-2016 is attached as annexure**I.**

8. That astonishingly the Respondent No. 1 issued the impugned notification on 10-01-2019 on the basis of the Hon'able Supreme Court Judgment decided on 13.05.2018 passed in the cases of Province of Punjab Police and without taking into consideration the validation Act No. IV of 2005 and ordered withdrawal of

- i) Standing Order No.11/1987
- ii) Letter No. 20710-60/1995
- iii) Standing Order No. 07/2003
- iv) Standing Order No.17/2014, and
- v) Standing Order No. 05/2016. Copy of the impugned notification dated 10-01-2019 is attached as annexure.....**J.**

9. That later on vide order dated 17.1.2019 the Notification dated 10.1.2019 has been held in abeyance and as such the appellant has become entitle for confirmation to the Rank of ASI (BPS-11) i.e. w.e.f. the date of arrival but the respondents are not willing to implement its own order. Copy of the order dated 17-01-2019 is attached as annexure.....**K.**

10. That appellant feeling aggrieved filed departmental appeal for implementation of the order dated 17.1.2019 but no reply has been received so far. Copy of the departmental appeal is attached as annexure.....**L.**

GROUND:

- A- That the impugned notification dated 10.01.2019 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside and the held in abeyance order dated 17.01.2019 be implemented in its letter and spirit.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the concerned authorities violated article 4, 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondent Department acted in arbitrary and malafide manner by issuing the impugned notification dated 10.01.2019 and not implementing the order dated 17.1.2019.

- D- That since promotion of the appellant to the post of ASI the Annual Confidential Reports for the year 2016, 2017, 2018 and 2019 manifest good record of the appellant, so being good credentials, law knowing, honest and hard working officer it is the right of the appellant to be promoted as per the Standing Orders issued from time to time. The impugned notification dated 10.01.2017 be set aside and the held in abeyance order dated 17.01.2019 be implemented. Copies of the ACRs are attached as annexure.....**M.**
- E- That it is pertinent to mention here that the Standing Orders which are withdrawn vide impugned order dated 10.01.2019 were respected/recognized by the Honorable Peshawar High Court, Peshawar in its Judgments given in a number of writ petitions, namely, W.P No.395-P/2017, W.P No. 2189-P/2018 and W.P No. 3263-P/2018. The judgment passed in W.P No.3263-P/2018 was later on acted upon by the respondent No. 1 in it order dated 11.09.2019. Copies of the Judgments in W.P and order dated 11.09.2019 are attached as annexure.....**N&O.**
- F- That it is quite wondering to know that some of the colleagues who had completed their tenure in PTC, Hangu as instructor were given confirmation for promotion to the rank of ASI as well as their names are placed on promotion list-E. This act on the part of respondents are discriminatory in nature and is pure violation of the Article 27 of the constitution of the Islamic Republic of Pakistan, 1973 i.e. **Safeguard against discrimination in services**. Copies of the confirmation for promotion orders of colleagues of appellant are attached as annexure.....**P.**
- G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT

ABID ULLAH KHAN

THROUGH:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&

**MIR ZAMAN SAFI
ADVOCATES**

3

A - 5

STANDING ORDER NO.11
CHAPTER XIX OF POLICE RULES
TRAINING STAFF INCENTIVES CADET INSTRUCTORS

BACK GROUND

Personnel posted as instructor at Police Training School serve with extreme reluctance. The moment an officer is posted on an instructional assignment, he makes every conceivable effort, political, administrative, compassionate, etc, to have his posting orders cancelled.

The state of mind of such a person, who arrives at a police training institution as an instructor, can be clearly visualized. He feels that he has been discriminated against, he is disgruntled and in a pathetic frame of mind. With this state of mind, these instructors create an atmosphere of a penal institution in the Training Centers.

For many years, this department has been cognizant of this problem. Some efforts have been made to find a solution. Various incentives have been offered to instructors but none of them has had any impact. Posting at Police Training still continues to be considered as a punishment posting.

Ideally, Instructors in Training School should not only be willing to serve but must be amongst the finest officers in the department. To achieve this end, personnel posted to Police Training Institution as staff member, are being offered the following incentives, will be categorized as CADET INSTRUCTORS.

INCENTIVES.

1. HC INSTRUCTORS.

Constables undergoing the Lower School Course who pass amongst the first five in the class, will be qualified to serve as HC instructors provided that they volunteer to serve in the Training Institute for three years.

Immediately at the end of three years if they have earned category 'A' reports they would be admitted to Intermediate School Course and their names placed on promotion list 'D' as soon as they qualify the Intermediate School Course.

2. ASI INSTRUCTORS

Head Constable undergoing the Intermediate School Course, who qualify amongst the first five in the class, will be qualified to serve as instructors provided they volunteer to work there for three years and earn category 'A' reports. They would be confirmed in the rank of ASI and their names would be brought on promotion list 'E'.

SI INSTRUCTORS.

ATTESTED

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A (4) (6)
Sub-inspectors undergoing upper college course, who qualify amongst the first five in the class, will be qualified to serve as instructors provided they volunteer to work there for three years and earn category 'A' reports.

At the end of that period, they would be confirmed in the rank of SI and their names will be brought on promotion list 'F'.

3.A.

Alternative if volunteers are not available to the offer contained in Para 3 above. Sub Inspectors volunteer to serve as instructors and are selected by the Principal, PTS Hangu, will be offered the same incentive, i.e after a tenure of three years at PTS Hangu with 'A' reports, they will be confirmed as Sub Inspectors and their names will be brought on list 'F'.

NOTE.

1. These incentives will not apply to directly recruited ASI's.
2. These incentives can be availed of only once in person's career.
3. Officers, who are selected as instructors on the basis of promotion examinations passed before 1984, will have to serve in the training institution for two years instead of three years.
4. The instructional tenure at PTS Hangu will be reduced to half for those officers who have secured first five positions, in the promotion examination but have already served in the training institution for two years.

-Sd-

(Muhammad Abbas Khan)
Inspector General Of Police.
NWFP Peshawar. 15.01.1987.

No. 869-92/E-II, Dated Peshawar the 17th January, 1987

Copies to :-

1. All DIsG Police in NWFP.
2. All AIsG in NWFP.
3. All SsP in NWFP.
4. The Principle PTS Hangu

ATTESTED

h

11A
 From : The Inspector General of Police,
 NWFP, Peshawar

To : The All Heads of Police Offices,
 NWFP, Peshawar

No. 20710-60/E-I, dated 01-10-1995

Memorandum

The Deputy Commandant PTC Hangu vide his letter No. 4456, dated 19-07-95 (copy enclosed) has requested that procedure regarding selection of Lower Subordinates serving in PTC Hangu & RTW Kohat in lacking in uniformity and contrary fairness and unity.

In this connection a meeting was held under the chairmanship of DIG/Hqrs NWFP, Peshawar on 20-08-95 to streamline the affairs.

The committee after the discussion proposed the following procedure which was approved by the Police Chief.

I. INTERMEDIATE SCHOOL COURSE

- (A) Official (s) on deputation (other than member(s) of the staff serving under standing order No. 11/1987 must have a continuous service serving at PTC/RTW at least 02 years before joining the course against PTC vacancy.
- (B) During the period mentioned above the official(s) to earn category "A" reports.
- (C) Broken period(s) if any in respect of the incumbents/officials transferred on complaint earned bad reports to be counted.
- (D) The official(s) must be on list C-I on their respective District (s) before selection.
- (E) Seats allowed to go vacant if no one is eligible to qualify the conditions cut lined above.
- (F) Common seniority of the deputationist on the basis of length of their services will be maintained for selection in the Intermediate School Course.

II. LOWER SCHOOL COURSE

- (A) Procedure "Marking system" given in standing order No. XI/1987 to apply in selection against the standing order.
- (B) Service at PTC/RTW to be given due weight-age and one year service at PTC/RTW to carry 02 marks, but broken period(s) not form part in counting.
- (C) Common seniority/merit list to be prepared amongst PTC and RTW staff. The matter regarding selection of D.Is on deputation to PTC/RTW Kohat under PR 19-22 in lower School Course was also discussed and it was decided that in future the selection amongst D.Is in Lower School Course will be made from the personnel who have at least 08 years service.

(SAKANDAR MOHAMMAD ZAI)

DIG/Hqr;
 For Inspector General of Police,
 NWFP, Peshawar

C A (5) C (8)

STANDING ORDER NO. 7/2003
TRAINING STAFF INCENTIVES CADET INSTRUCTORS.

INTRODUCTION

In exercise of the power vested in me under article 10(3) of the Police Order 2002 are following standing order is issued with the prior approval of Provincial Government conveyed vide letter No. SO (Police) ID /13-1/2003 dated 27.03.2003 and letter No. SO (Police) / HD / 13-1/82 /1220 dated 12.07.2003.

AIM

- i. To attract official staff to the training institutions.
- ii. To improve the quality of the training.

APPLICABILITY

This Standing Order will apply to all the training institutions and shall come into force with effect from 11.12.2003.

OBJECTIVES

Training is an integral function of personnel management. It is a continuous process and involved in depth instructions for all personnel. For many years police work was considered as an instinctive activity while only gifted officer could perform effectively without formal instructions or training, but in the modern world today in the light of the changing role of the working Police Office and growing emphasis on specialization, the need for a comprehensive program of Police training is irrefutable. Regardless of the individual qualifications, individual, negligence, judgment and emotional fitness, the Police officer must receive extensive vocational training they can learn the Police task and learn how to fulfill it.

The quality training can only be provided if the trainers are sound academic and professional qualifications. The trainees should be willing and must posses the qualities of vision and research. The major objectives and areas of their in-put in training would:-

The perception of in service training of newly promoted officers of their training needs in the light of their previous training and their operational experience.

The perception of persons and organizations, out side the police service regarding the role and training of police supervisors.

An insight into the "Preferred" learning style of Police Officers. An elaborate study of what service requires from Police Officers.

An in depth knowledge of the requirement of new recruits and convert them into a fine Police Officer.

All these above objectives can be achieved by posting not only the willing to serve but must be among the finest officers in the department to achieve this and following incentives. Instructions selected in pursuance of these incentives will be categorizes as CADET INSTRUCTORS.

INCENTIVES.

3. **IIC INSTRUCTORS.**

Constables undergoing the Lower School Course who pass amongst the first five in the class, will be qualified to serve as HC instructors provided that they volunteer to serve in the Training Institute for three years. Immediately at the end of

ATTESTED

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three years if they have earned category 'A' reports they would be admitted to Intermediate School Course and their names placed on promotion list 'D' as soon as they qualify the Intermediate School Course.

4. ASI INSTRUCTORS

Head Constable undergoing the Intermediate School Course, who qualify amongst the first five in the class, will be qualified to serve as instructors provided they volunteer to work there for three years and earn category 'A' reports. They would be confirmed in the rank of ASI and their names would be brought on promotion list 'E'.

SI INSTRUCTORS.

Sub inspectors undergoing upper college course, who qualify amongst the first five in the class, will be qualified to serve as instructors provided they volunteer to work there for three years and earn category 'A' reports.

At the end of that period, they would be confirmed in the rank of SI and their names will be brought on promotion list 'F'.

3.A. Alternative if volunteers are not available to the offer contained in Para 3 above. Sub Inspectors volunteer to serve as instructors and are selected by the Principal, PTS Hangu, will be offered the same incentive, i.e after a tenure of three years at PTS Hangu with 'A' reports, they will be confirmed as Sub Inspectors and their names will be brought on list 'F'.

NOTE

1. These incentives will not apply to directly recruited ASI's.
2. These incentives can be availed of only once in person's career.
3. Officers, who are selected as instructors on the basis of promotion examinations passed before 1984, will have to serve in the training institution for two years instead of three years.
4. The instructional tenure at PTS Hangu will be reduced to half for those officers who have secured first five positions, in the promotion examination but have already served in the training institution for two years.

(MUHAMMAD RAFFAT PASHA)
Inspector General of Police
NWFP, Peshawar.

No. 91-141/C-1, dated Peshawar, the 05.01.2004.

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

TESTED

uB

1. The Section Officer (Police) Govt. of NWFP Home & TAs. Department of Peshawar with reference to their letters quoted above.
2. All Head of Police Offices in NWFP.
3. All Branches of CPO.

RECEIVED

u /



D

(9)

D-11

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

STANDING ORDER NO. 17/2014

Incentive for the physical training instructor at PTC and Elite School

This standing order is issued under Article 10(03) of Police Order 2002 in pursuance of the Police Policy Board decision taken in its 5th meeting held on 29th January 2014.

2. **Aim:-** Presently, the training institutions face shortage of physical training instructors due to lack of proper incentives for trainers. This Standing Order aims at addressing this issue.
3. **Selection of Physical Training instructors :-** Physical Training Instructor shall be selected for posting in PTC and Elite Training School in accordance with a criteria to be determined by the provincial Police Officer.
4. Physical Training Instructor shall be eligible for lower School Course at the Completion of three year tenure in PTC or any other police training institutions, in accordance with Police Rule 19:22. The same incentive shall also be provided to the Elite Training qualified officers who serve as Physical Training Instructors.
5. Physical Training Instructor shall be returned to their respective Districts at the completion of three years tenure, in accordance with Police Rules 19:22. A Physical Training Instructor shall not be retained at the PTC after the completion of three years except with the prior approval of the Inspector General of Police.
6. **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.
7. **Amendment:-** All previous standing orders on the subject, to the extent of the provisions of this order, shall stand amended.

ATTESTED

[Signature]

(NASIR KHAN DURRANI)
Provincial Police Officer
Khyber Pakhtunkhwa
Peshawar

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ACT IV OF 2005

NORTH-WEST FRONTIER PROVINCE

VALIDATION OF STANDING ORDER ACT, 2005

An Act to validate the rights created by Standing

Order No. 11 of 1987, issued by the Inspector General

of Police, North-West Frontier Province

(Gazette of NWFP extraordinary, 2nd February, 2005)

No. PA/NWFP/Logis: 1/2005/ 1899, dated 02.02.2015. The North-West Frontier Province Validation of Standing Order Bill, 2005 having been passed by Provincial Assembly of North-West Frontier Province on the 17th January, 2005 and assented to by the Governor of the North-West Frontier Province on 19th January, 2005 is hereby published as an Act of the Provincial Legislature of the North-West Frontier Province.

Preamble:

Whereas it is expedient to validate the rights created by Standing Order no. 11 of 1987, issued by the Inspector General of Police, North-West Frontier Province:

It is hereby enacted as follows:

1. **Short title and commencement:** (1) This Act may be called the North-West Frontier Province Validation of Standing Order Act, 2005.
2. It shall come into force at once and shall be deemed to have taken effect on the 17th day of July, 1987.
3. Validation of Standing Order No. 11 of 1987. (1) Notwithstanding anything contained in the existing service rules governing the promotion and seniority of Constables, Head Constables, Assistant Sub Inspector, and Sub Inspector of the Police Department, or any decree order of judgment of a Court, or for reason of any procedural deficiency.....
 - a. The rights of promotion and seniority accruing under Standing Order No. 11 of 1987 (hereinafter referred to as the said order), issued by the Inspector General of Police, North West Frontier Province, in the larger public interest, with the sole intention and object to improve the efficiency and sense of responsibility amongst the aforesaid police personnel, shall be deemed, and shall always be deemed, to have validity been accrued; and

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b. All appointments and promotions made and seniority lists drawn from 1987 till date, on the basis of the said order, shall always be deemed to have validly been made and drawn and shall not be called in question before any court or authority.

2. The existing service rules governing the seniority of the said Police personnel, till such time as formally amended, shall, to the extent of service the purposes under subsection (1), be deemed to have been impliedly modified.

Ref: VOL. LVII-2005 NWFP STATUES PLD NOV: 2005, PAGE NO: 27-28
NWFP VALIDATION OF STANDING ORDER ACT, 2005.

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Ph # 0925-621886

Fax # 0925-623236

Office the Commandant, Police Training College, Hangu.

F-15

FOR PUBLICATION IN KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II
ORDERS BY THE COMMANDANT POLICE TRAINING COLLEGE HANGU.

NOTIFICATION
Dated 07-11-2016.

No. 1909/S/RESULT: The result of the following Officers, of your Distt./Units, who appeared in the final examinations of Intermediate College Course, held at PTC Hangu for the term ending 30.09.2016 is hereby announced and given below. Their Order of Merit is noted against each. The Original Performance Reports, of the Passed Candidates shall be issued and sent separately.

Result of Top 10 Candidates of Intermediate College Course, Term Ending 30.09.2016.

S#.	Comp#.	Name	Belt#.	District.	Merit No
1	I-2763	Riaz Ali	480	Buner	1
2	I-2885	Abid Ullah	362	Bannu	2
3	I-2799	Muhammad Ali	352	Shangla	3
4	I-2904	Noor Unnas	720	Kohistan	4
5	I-2835	Syed Akhtar Ali	1474	Swat	5
6	I-2769	Abdul malik	154	Kohistan	6
7	I-2758	Akbar Ali	30	Shangla	7
8	I-2755	Muhammad Essa Khan	2514	CCP Pesh:	8
9	I-2857	Umar Hayat	65	PTC/CCP Pesh:	9
10	I-2919	Adnan khan	1192	Mardani	10

Result of Intermediate College Course, Term Ending 30.09.2016

11	I-2797	Muhammad Javed Khan	723	Dir Lower	11
12	I-2807	Fazal Malik	825	Swabi	12
13	I-2930	Qazi Saleem	1210	Mardan	13
14	I-2762	Amin Ullah	62	Dir Upper	14
15	I-2892	Masood Ali	267	Shangla	14
16	I-2910	Rahim khan	5575	CCP Pesh:	15
17	I-2808	Akhtar Ali	1276	Swabi	16
18	I-2932	Sher Muhammad	1468	Mardan	17
19	I-2784	Faiz Ali	175	Shangla	18
20	I-2862	Muhammad Ijaz	63	Haripur	19
21	I-2798	Gohar	66	Swat	20
22	I-2844	Ijaz Khan	872	Nowshera	21
23	I-2926	Muhammad Farooq	1273	Mardan	22
24	I-2800	Hameed Ullah Khan	4119	CCP Pesh:	23
25	I-2921	Muathar Shah	402	Charsadda	24
26	I-2914	Qari Hidayat Ullah	2414	CCP Pesh:	25
27	I-2785	Zahid Ullah	120/1278	Dir Upper	25
28	I-2861	Umar Hayat	468	Swat	26
29	I-2824	Khair Ullah Khan	248	Buner	27
30	I-2757	Muhammad Asif	517	Charsadda	28
31	I-2771	Sifat Ullah	408	Lakki Marwat	29
32	I-2890	Rehman Gul	1022	Mardan	30
33	I-2843	Hussain Ali,	1152	Swat	31
34	I-2906	Habib Ur Rehman	639	Mardan	32
35	I-2929	Muhammad Amin	930	Charsadda	32
36	I-2868	Waheed Ullah	1918	Dir Lower	33
37	I-2928	Alam Zeb	1094	Mardan	34
38	I-2840	Kashif Abbas	367	Abbottabad	35

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S#.	Comp#.	Name	Belt#.	District.	Merit No
39	I-2898	Muhammad Jehangir	2675	Mardan	36
40	I-2773	Ali Haider	231	Charsadda	37
41	I-2845	Masood Khan	494	CCP Pesh:	37
42	I-2815	Sar Zamin Khan	865	Swabi	38
43	I-2772	Muhammad Riaz	190	Dir Upper	39
44	I-2830	Aziz Ullah	294	Buner	40
45	I-2842	Muhammad Syar	814	Swabi	41
46	I-2829	Dil Jan	826	D.I.Khan	42
47	I-2918	Ayaz Ali	80	hangu	43
48	I-2836	Noor Muhammad	9	CCP Pesh:	44
49	I-2852	Rahat Shiah	596	CCP Pesh:	44
50	I-2847	Maroof Khan	19	PTC Hangu	45
51	I-2931	Muhammad Shoaib	949	Bannu	46
52	I-2878	Amjad Khan	336	Haripur	47
53	I-2775	Irshad Badshah	328	Charsadda	48
54	I-2793	Fazal Ilahi	402	CCP Pesh:	49
55	I-2765	Syed Gulbaz Shah	66	Kohistan	50
56	I-2915	Muhammad Ibrahim	657	CCP Pesh:	51
57	I-2848	Suleman Khan	818	Swabi	52
58	I-2779	Imran Ullah	175	Tank	53
59	I-2865	Muhammad Usman	190	Kohistan	54
60	I-2894	Bakhat Nawaz	2669	Mardan	55
61	I-2920	Afsar Khan	85	Mardan	56
62	I-2809	Imtiaz Ahmad	1805	Mardan	57
63	I-2879	Muhammad Hussain	1168	CCP Pesh:	58
64	I-2933	Atlas Khan	477	haripur	58
65	I-2767	Naseer Khan	248	Karak	59
66	I-2876	Syed Nasir Hussain	309	Hangu	60
67	I-2864	Amir Zeb	963	Swat	61
68	I-2900	Kifayat Ullah Khan	13	Bannu	62
69	I-2789	Hayat Ullah	1820	Bannu	63
70	I-2761	Shah Khalid	2670	Mardan	64
71	I-2801	Muhammad Zaib	905	Dir Lower	65
72	I-2923	Zahid Iqbal	321	Dir Upper	66
73	I-2831	Liaqat Ali	379	Buner	66
74	I-2905	Rasta Baz	75	Bannu	66
75	I-2853	Karim Dad	3910	CCP Pesh:	67
76	I-2825	Muhammad Khan	373	Buner	68
77	I-2893	Syed Inam Ullah Shah	2105	CCP Pesh:	69
78	I-2907	Muhammad Ishaq	1354	Swat	70
79	I-2826	Mushtaq Ahmad	261	D.I.Khan	71
80	I-2886	Aftab Ahmad	744	Kohat	71
81	I-2784	Miraj Muhammad	199	Dir Upper	72
82	I-2810	Mukamil Shah	769	Dir Lower	73
83	I-2877	Ihsan Ul Haq	252	Dir Lower	74
84	I-2901	Tasleem Mian	430	Swat	75
85	I-2777	Muhammad Farooq	235	Karak	76
86	I-2912	Tahir Ali	2445/432	Mardan	77
87	I-2872	Younas Ali Khan	181	Chitral	77
88	I-2828	Hamayun khan	511	D.I.Khan	78
89	I-2883	Abid Hussain	576	Mansehra	79
90	I-2756	Alamzeb	1935	CCP Pesh:	80
91	I-2860	Alaf Zada	5570	CCP Pesh:	81
92	I-2760	Syed Shahid Ali Shah	3709	CCP Pesh:	81
93	I-2791	Amjad Iqbal	259	Swat	82
94	I-2778	Naeem Ullah	483	Kohistan	83
95	I-2884	Tahir Shah	238	Shangla	83
96	I-2908	Falak Taj	36	CCP Pesh:	83
97	I-2782	Mansoor Khan	2979	CCP Pesh:	84
98	I-2806	Khalil Nawaz	1089	Bannu	85

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Sl.#.	Comp#.	Name	Belt#.	District.	Merit No
99	I-2812	Abdur Rehman	886	D.I.Khan	86
100	I-2875	Adil Hussain	322	Hangu	86
101	I-2867	Habib Ur Rehman	550/774	Swat	87
102	I-2846	Muhammad Shakeel	438	Abbottabad	88
103	I-2834	Safi Ullah Khan	601/SB	CCP Pesh:	88
104	I-2814	Nawab Khan	2051	CCP Pesh:	89
105	I-2925	Niamat Ullah	272	CPC Pesh:	90
106	I-2792	Niaz Ali	1437	Swat	91
107	I-2832	Gohar Khan	1943	CCP Pesh:	92
108	I-2880	Liaqat Ali	686	Mansehra	93
109	I-2838	Anwar Zeb	4099/3841	CCP Pesh:	94
110	I-2916	Mushtaq Ahmad	1372	Swat	95
111	I-2804	Muhammad Esa	38	Lakki Marwat	95
112	I-2780	Miraj Muhammad Khan	326	Karak	96
113	I-2873	Mushtaq Ahmad	72	Dir Lower	96
114	I-2871	Gohar Rehman	1532	Swat	97
115	I-2874	Nizam Ud Din	28	Dir Lower	98
116	I-2881	Zaheer Abbas	143	Mansehra	99
117	I-2783	Abdul Samad	1059/205	CCP Pesh:	100
118	I-2899	Lal Majeed	790	Kohat	101
119	I-2790	Farman Ali	500	Swat	101
120	I-2896	Rauf Khan	595/08	Kohat	102
121	I-2903	Muhammad Hayat	222	Kohat	103
122	I-2837	Alao Ud Din	136	Kohat	104
123	I-2802	Muhammad Fazil Shah	399	Bannu	105
124	I-2911	Farkh Siyar	71	Mardan	106
125	I-2816	Muhammad Akram	800	Swabi	107
126	I-2854	Johar Ali	716	Nowshera	108
127	I-2796	Muhammad Ibrahim Khan	2500	CCP Pesh:	109
128	I-2889	Shakeel	3941	CCP Pesh:	110
129	I-2833	Ijaz Khan	759	Nowshera	111

Result of Re-Appeared Candidates in Intermediate College Course, Term Ending 31.05.2016.

130	I-2590	Anwar Ul Haq	6	Swat	112
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Result of Intermediate College Course, Term Ending 30.09.2016

131	I-2839	Safdar Zaman	364	Abbottabad	113
132	I-2827	Shahinshah	202	CCP Pesh:	113

Result of Re-Appeared Candidates in Intermediate College Course, Term Ending 31.05.2016.

133	I-2485	Faiz Ur Rehman	2527	Mardan	114
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Result of Intermediate College Course, Term Ending 30.09.2016

134	I-2866	Muhammad Javed	36	CPC Pesh:	115
135	I-2820	Fatih Ul Mulk	375	Buner	116
136	I-2817	Sartaj Khan	2496	CCP Pesh:	117
137	I-2891	Arshad Hussain	604	Bannu	118
138	I-2870	Rashid Khan	204	Haripur	119
139	I-2856	Sajjad Ullah	2971	CCP Pesh:	120
140	I-2841	Mira Khan	1302	CCP Pesh:	121
141	I-2927	Mati Ullah	94	Lakki Marwat	122
142	I-2818	Muslim Khan	875	Charsadda	123
143	I-2766	Nowsharwan	246	Charsadda	124
144	I-2917	Hazrat Ali	912	Nowshera	125
145	I-2803	Khalil Ur Rehman	718	Mansehra	126
146	I-2811	Noor Ul Haq	255	CPC Pesh:	127
147	I-2774	Shams Ud Din	1	Tank	128
148	I-2794	Ajmal Khan	549/SB	CCP Pesh:	129
149	I-2913	Nadeem Shahzad	988	CCP Pesh:	129
150	I-2855	Gulab Sher	386	Nowshera	130

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S#.	Comp#.	Name	Belt#.	District.	Merit No
151	I-2788	Jameel Khan	995	Bannu	131

Result of Re-Appeared Candidates in Intermediate College Course, Term Ending 31.05.2016.

152	I-2596	Ijaz Ullah	485/SB	SB Pesh:	132
153	I-2630	Hanif Ur Rahman	26	Nowshera	133
154	I-2681	Muhammad Saleh	124	Swabi	134

Result of Intermediate College Course, Term Ending 30.09.2016

155	I-2882	Muhammad Iqbal	143	Kohat	135
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Result of Re-Appeared Candidates in Intermediate College Course, Term Ending 31.05.2016.

156	I-2643	Khalid Khan	466	Charsadda	136
157	I-2720	Javed Iqbal	1254	CCP Pesh:	137
158	I-2698	Masood Khan	228	CPC Pesh:	138
159	I-2612	Muhammad Yaqoob	106	Swat	139
160	I-2466	Muhammad Zahir Shah	76	Tank	140
161	I-2683	Sittar Alam	464	Swabi	141
162	I-2605	Abdul Saeed	600	Kohistan	142
163	I-2726	Muhammad Hanif	6	Haripur	143
164	I-2533	Taimoor Shah	919	Mardan	144

Awarded Grace Marks, Declared Passed in Intermediate College Course, Term Ending 30.09.2016

165	I-2859	Tanveer Hassan	13	Hangu	145
166	I-2823	Arab Khan	568	D.I.Khan	146
167	I-2764	Zaffar Ali	3673	CCP Pesh:	147
168	I-2776	Sher Baiz	410	Chitral	148
169	I-2924	Muhammad Amjad	208	Mansehra	149
170	I-2851	Muhammad Saddique	401	Abbottabad	150
171	I-2759	Saeed Ullah	350	Chitral	151
172	I-2863	Shah Alam Niaz	180	Dir Lower	152
173	I-2869	Afzal Hussain	1485	Swat	153
174	I-2813	Sultan Bahadur	302	Dir Upper	154
175	I-2902	Inayat Ullah	898	D.I.Khan	155
176	I-2858	Ikhtlaq Ahmad	279	Abbottabad	156
177	I-2787	Muhammad Farooq	659	Mansehra	157
178	I-2819	Babar Khan	307	Kohistan	158
179	I-2849	Abid Khan	455	Abbottabad	159
180	I-2821	Ismail Shah	33	Buner	160
181	I-2822	Noor Zaman	272	Swabi	161
182	I-2887	Zahoor Ali	1551	Mardan	162
186	I-2805	Muhammad Afzal	597	Dir Lower	166
183	I-2922	Muhammad Iqbal ud Din	877	Chitral	163
184	I-2888	Hashim Khan	177	Lakki Marwat	164

Awarded Grace Marks, Declared Passed Re-Appeared Candidates in Intermediate College Course, Term Ending 31.01.2016

185	I-2542	Farman Ali	3483	CCP Pesh:	165
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Awarded Grace Marks, Declared Passed in Intermediate College Course, Term Ending 30.09.2016

187	I-2897	Muhammad Safdar	260	D.I.Khan	167
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Awarded Grace Marks, Declared Passed Re-Appeared Candidates in Intermediate College Course, Term Ending 31.01.2016

188	I-2684	Shahid Khan	1455	CCP Pesh:	168
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Awarded Grace Marks, Declared Passed in Intermediate College Course, Term Ending 30.09.2016

189	I-2795	Amjad Ali	167	Battagram	169
190	I-2770	Gul Sambar Ul Mulk	866	Chitral	170

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S#.	Comp#.	Name	Belt#.	District.	Merit No
191	I-2768	Muhammad Ali	512/174	CCP Pesh:	171
192	I-2850	Muhammad Zahid	3595	CCP Pesh:	172
193	I-2786	Aziz Ullah	133	Battagram	173
194	I-2895	Syed Waqar Hussain Shah	77	Abbottabad	174
195	I-2718	Reham Zeb	1488	Swat	175

(19)

Result of Failed Candidates in Intermediate College Course, Term Ending 30.09.2016

S#.	Comp#.	Name	Belt#.	District.	Failed Sub:
196	I-2909	Ihsan Ullah	159	Hangu	LSL

Prepared by In-charge Secrecy,

[Signature]

Checked and found correct.

[Signature]

Controller of Examinations,

Fasihuddin
Fasihuddin, PSP
Commandant,
Police Training College, Hangu.

[Signature]

No. 1910-44/S dated Hangu, the 07.11-2016.

Copy for information and necessary action to:

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Addl: IGP HQrs, Khyber Pakhtunkhwa, Peshawar.
3. The DIG Training, Khayber Pakhtunkhwa Peshawar.
4. The Capital City Police Officer, Peshawar.
5. The DIsG/RPOs Police Bannu, Hazara, Malakand, D.I.Khan, Kohat and Mardan Regions.
6. The DIG: Special Branch Khyber Pakhtunkhwa, Peshawar.
7. The Commandant Campus Peace Corps University of Peshawar.
8. The DPOs, Abbottabad, Bannu, Battagram, Buner, Charsadda, Chitral, D.I.Khan, Dir Lower, Dir Upper, Hangu, Haripur, Karak, Kohat, Lakki Marwat, Kohistan, Mansehra, Mardan, Nowshera, Swabi, Swat, Shangla & Tank.
9. The Office Superintendent, PTC Hangu.

ATTESTED

Fasihuddin
Fasihuddin, PSP
Commandant,
Police Training College, Hangu.

[Signature]



G-20

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE, PESHAWAR

ORDER

Head Constable Abidullah No. 302 of Bannu District Police is hereby transferred and posted to PTC/Hangu under standing order No. 07/2016 with immediate effect.

Najeeb
(NAJEEB-UR-REHMAN BUGVI) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 11277-79 /E-IV dated Peshawar the 16/11/2016

Copy of above is forwarded for information to the:-

1. Deputy Inspector General of Police Bannu Region Bannu.
2. Commandant PTC/Hangu w/r to his office letter No. 1316/EC, dated 04.11.2016.
3. District Police Officer Bannu w/r to his Memo NO. 18303/ dated 14.11.2016.

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Handwritten: 07/11/16

Ph # 0925-621886
Fax # 0925-620886

Office of The Commandant, Police Training College Hangu.

21

From: The Commandant,
Police Training College, Hangu.

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

No: 1316/IG, dated Hangu, this.

04/11/2016.

Subject: TRANSFER OF LOWER SUBORDINATE.

Memo:
The following Head Constables of various districts were among "Top five" in the promotion examination of Intermediate college course in the term ending 30.09.2016, and they are also volunteer / willing to serve at PTC Hangu under Standing Order No. 07/2003.

S. No	Rank and Name	District
01	Head Const: Riaz Ali No. 430	Buner
02	Head Const: Abidullah No. 362	Bannu
03	Head Const: Inoor-un-Nas	Kohistan
04	Head Const: Muhammad Ali No. 352	Shangla
05	Head Const: Syed Akhtar Ali No. 174	Swat

It is, therefore, requested that transfer order of the above named Head Constables to PTC may please be issued.

Handwritten signatures and dates: 07/11/16, 11/11/16

Stamp: 5976/EG
2016
Inspector General of Police
Khyber Pakhtunkhwa Peshawar

Signature: Fasihuddin
(Fasihuddin), PSP
Commandant
Police Training College, Hangu.

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OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA PESHAWAR

to H/S-IV, Peshawar the 11/11/2016

Copy of above is forwarded for concurrence to DPOs Buner, Bannu, District Shangha and Sait



(PERVEZ ILLAHI)

Registrar

for Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

ATTESTED



From: The District Police Officer, Bannu.

To: The Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.


23

No. 18303 / dated Bannu, the 14 / 11 / 2016.

Subject: TRANSFER OF LOWER SUBORDINATES


Memo: Kindly refer to the CPO, Peshawar Memo No. 11120-24/E-IV dated 11.11.2016 on the subject cited above.

This office has got no objection over the transfer of Head Constable Abid Ullah No. 362 from this district Police to PTC, Hangu, please.


District Police Officer
Bannu

Resigned
Syauq
HC

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1055

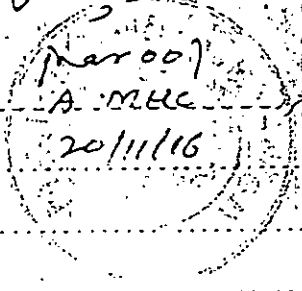
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مذکورہ

20/11/25
 353
 20/11/25
 15/16
 07/2023
 PT

خانہ نمبر
 نکل عظامیہ روزنامہ اہل



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(I)

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Ph # 0925-621886
Fax # 0925-620886

Office Of The Commandant Police Training College Hangu.

ORDER.

Consequent upon transfer to PTC, IHC Abidullah No. 362 of district Bannu is hereby promoted to the rank of ASI (BPS-09) on the available vacancy of PTC Hangu from the date of his arrival i.e 20.11.2016, as provided in Standing Order No. 07/2003.

OB No: 869

Dated: 29-11-2016.

Amiruddin
Commandant
Police Training College, Hangu

ATTSTED

M.T.



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR

J-26

No. 10012/F100 /G:B, dated

Peshawar the 10 /01/2019

NOTIFICATION

In compliance with the judgement of Supreme Court of Pakistan dated 13/05/2018, and recommendations of the committee constituted for the purpose, the following Standing Orders/Instructions which extend the incentives for promotion and confirmation to the Cadet Law Instructors and Drill Instructors serve in the Police Training College Hangu and other Training Institutions amount to out of turn promotion are hereby withdrawn:-

1. Standing Order No: H/1987.
2. Letter No: 20710-60/1995.
3. Standing Order No: 07/2003.
4. Standing Order No: 17/2014.
5. Standing Order No: 05/2016.

Sd/-
SALAH UD-DIN KHAN
Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Copy of above is forwarded to all Heads of Police Offices in Khyber Pakhtunkhwa for information and further necessary action.

(SADIQ BALOCH) P.S.P.
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

ATTENDED
M.S.



No. R.O. 1200

G.O. dated:

Peshawar the:

17/01/2019

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR

76
22/01/19
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ORDER

Notification No. 1001-1100/G.O. dated 10/01/2019 to be held in abeyance.

The issue needs to be discussed in detail prior to implementation.

Sd/-
SALAH UD-DIN KHAN
Inspector General of Police
Khyber Pakhtunkhwa
Peshawar

Copy of above is forwarded to all Heads of Police Offices in Khyber Pakhtunkhwa for information and further necessary action.

(SADIQ BALOCH) PSP
A/C Establishment
For Inspector General of Police
Khyber Pakhtunkhwa
Peshawar

Sen
Bc / Dep. Lagal
Lm 4 - m 708 Case

Commandant
Police Training College
Hangu

RECEIVED
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درخواست بمراد اجراء لیٹر برائے کنفریشن

28

جناب عالی!

گزارش ہے کہ من سائل کا بحوالہ سنڈنگ آرڈر نمبری 11/1987، 07/2003 اور ویلیڈیشن ایکٹ نمبر IV سال 2005ء اور بحوالہ حکم نمبری 79-11277 مورخہ 16-11-2016 جاریہ جناب آئی جی ایف پشاور خیبر پختونخوا بحیثیت کیڈٹ لاء انسٹرکٹر مورخہ 20-11-2019 کو بحوالہ مد 64 ادارہ ہذا میں حاضری کی ہے (آرڈر کاپی و نقل مد حاضری ہمراہ لفٹ ہیں)۔

مورخہ 19-11-2019 کو من سائل کا (تین) سالہ کیڈٹ لاء انسٹرکٹر پیریڈ سے مکمل ہو چکا ہے۔ اور جملہ ACR's A رپورٹ کے ساتھ حاصل کی ہیں۔

لہذا بذریعہ درخواست استدعا ہے کہ من سائل کے آبائی ریجن بنوں RPO صاحب کو بعدہ ASI کنفریشن اور لسٹ E پر لانے کی خاطر خط و کتابت فرمائی جائے۔

عین نوازش ہوگی

مورخہ 19-11-2019

العارض

آپکا تابع فرمان ASI عبداللہ خان لاء انسٹرکٹر پولیس ٹریننگ کالج ہنگو آبائی ریجن بنوں حال محرر پی ٹی سی ہنگو

عبداللہ خان

ATTESTED

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POLICE TRAINING COLLEGE HANGU
 Estab: 1935
 FORM NO. 13.17

30

DISTT: BANNU

POLICE DEPARTMENT

ANNUAL CONFIDENTIAL REPORT

ON THE WORKING OF INSPECTORS, SUB-INSPECTORS, ASSTT: SUB-INSPECTORS, PROSECUTING IN SPECTORS & PROSECUTING SUB-INSPECTORS. FOR THE YEAR ENDING ON 31 DECEMBER 2017.

1.	Name, Provincial or Range No. Rank and Grade.	Mr. Abidullah Asstt: Sub-Inspector (BPS-09)
2.	Father's Name.	Hayatullah Khan
3.	Where and on what duties employed during the past twelve months.	01.01.2017 to 31.12.2017 Law Instructor + Reader to CLI Police Training College Hangu.
4.	Is this officer in your opinion honest?	"yes"
5.	Class of Supdt: of Police's DIG of Police's Report i.e "A" or "B".	"A"
6.	Remarks by Reporting Officers:- Period: 01.01.2017 to 11.06.2017 <i>punctual, obedient and a Responsible police officer.</i> <i>(Signature)</i> (MUHAMMAD NAWAB KHAN) Chief Law Instructor Police Training College, Hangu	Period: 12.06.2017 to 31.12.2017 <i>"Dutiful & good Law instructor"</i> <i>(Signature)</i> (MIAN NASEEB JAN), SP Deputy Commandant, Police Training College, Hangu

Remarks / Countersigned by Higher Officer.

Agreed with the reporting officers,

ATTESTED

(Signature)
 (FASIHUDDIN), PSP
 Commandant,
 Police Training College, Hangu

(Signature)



POLICE TRAINING COLLEGE HANGU

Estab: 1935

FORM NO. 13.17

31

POLICE DEPARTMENT

DISTT: BANNU

ANNUAL CONFIDENTIAL REPORT

ON THE WORKING OF INSPECTORS, SUB-INSPECTORS, ASSTT: SUB-INSPECTORS, PROSECUTING INSPECTORS & PROSECUTING SUB-INSPECTORS. FOR THE YEAR ENDING ON 31 DECEMBER 2018.

1.	Name, Provincial or Range No. Rank and Grade.	Mr. Abidullah, No. 362 Asstt: Sub-Inspector (BPS-11)
2.	Father's Name.	Hayatullah Khan
3.	Where and on what duties employed during the past twelve months.	01.01.2018 to 28.08.2018 Law Instructor + Reader to CLI, 29.08.2018 to 31.12.2018 Law Instructor + Naib I/C: Record Branch, Police Training College Hangu.
4.	Is this officer in your opinion honest?	No Complaint
5.	Class of Supdt: of Police's DIG of Police's Report i.e "A" or "B".	"A"
6.	Remarks by:- Superintendent of Police's DIG of Police's/ Officer authorized by Comdt: PTC Hangu.	An Intelligent, hard working Law Instructor.

ATTESTED

(SHAH MUMTAZ), DSP
Chief Law Instructor,
Police Training College, Hangu

Remarks / Countersigned by Higher Officer.

agree

(DR: MASOOD SALEEM), PSP
Commandant,
Police Training College, Hangu

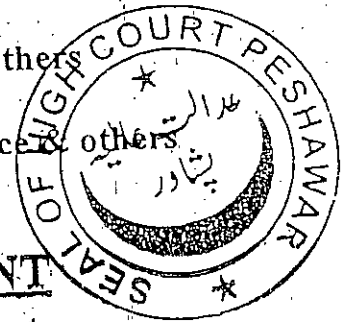
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Judgment sheet
PESHAWAR HIGH COURT,
PESHAWAR
Judicial Department

WP No. 3263-P/2018

Javed Nasir & others
Vs.
Provincial Police Officer & others



JUDGMENT

Date of hearing 15.05.2019
Appellant(s) by Mr. Irfan Ali Yousafzai, Advocate
Respondent(s) by Mr. Rab Nawaz Khan, AAG

IKRAMULLAH KHAN, J.- Through the instant constitutional petition, petitioners have prayed for the following relief:

"On acceptance of this instant writ petition this Hon'ble Court may graciously be please to declare the act of the respondents as unlawful and illegal by not allowing the petitioners to join the forth coming Lower Training Course which was to be commenced w.e.f 03.07.2018 and to direct the respondents to allow the petitioners to join the Lower Training Course at Police Training College/Center, Hangu as per their eligibilitites and entitlement under the provision of standing order No.17/2014 of the office of Inspector General of Polide Khyber Pakhtunkhwa. The case of the present petitioners are similar and identical both on factual as well as legal point and reference to those who has been allowed by the respondents, therefore, the petitioners also deserve to be treated similarly and are entitled to be

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2. In essence, petitioners are employees of the respondent Department, serving as Drill Instructor/Martial Art Instructor in the Police Training School at Swabi. Their grievance as gleaned out from the contents of this writ was despite the fact that they had already completed the prescribed length of service as Drill Instructors/Martial Art in view of Standing Order No.17/2014 but they were not enlisted for the Lower School Training.

3. The respondents were summoned, who submitted their comments, whereby on one hand they took the ground that the cases of the petitioners not covered under Standing Order 17/2014 while on the other hand they had taken refuge behind the judgment of the Apex Court, whereby out of turn promotion was highly deprecated.

ATTESTED

4. This Court while deciding WP No.3386-P/2016 and similar nature other writ petitions were allowed cadet at par with the petitioners to join the Intermediate Course, reference at this stage be given in WP No.628-P/2014 and WP No.395-P/2017 titled Khalil ur Rehman Vs Provincial Police Officer and

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the officers posted as PTC Hangu which reads as under:

- i. Such instructors may become eligible to be included in Lower Intermediate and Upper College Courses after completion of three (3) years period and earning satisfactory ACRs.
- ii. The incentive can be availed once during the career.
- iii. There should be a mechanism for selecting such candidates preferably through a board of officers including the officers from CPO.
- iv. It was further decided that the officers selected for such courses will not get out of turn promotion and the seniority list of other officers shall not be affected in any way.

5. Keeping in view the judgment of this Court as well as Standing Order 2 of 2012, this writ petition is disposed of in term that the respondents are directed to consider their cases in view of judgment of this Court referred hereinabove and Standing Order No.2 of 2012 as well as the relevant Rules in vogue.

Announced:
15.05.2019

ATTESTED

CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court Peshawar
Authd. 1994 Under Article 57 of
The Constitution of Pakistan Order 1994

19 JUL 2019

JUDGE

216

35

Judgment sheet
PESHAWAR HIGH COURT,
PESHAWAR
Judicial Department

WP No. 2189-P/2018

Farooq Anwar & others
Vs.
Provincial Police Office & others

JUDGMENT

Date of hearing : 22.05.2019
Appellant(s) by : Mr. Irfan Ali Yousafzai, Advocate
Respondent(s) by : Mr. Kamran Hayat, AAG

IKRAMULLAH KHAN, J.- Through the instant constitutional petition, petitioners have prayed for the following relief:

"On acceptance of this instant writ petition this Hon'ble Court may graciously be please to declare the act of the respondents as unlawful and illegal by not allowing the petitioners to join the forth coming intermediate Training Course which was to be commenced w.e.f 10.05.2018 and to direct the respondents to allow the petitioners to join the intermediate Training Course at Police Training College/Center, Hangu as per their eligibilities and entitlement under the provision of standing order No.11/87 letter No.20610-60/E-1 dated 01.10.1995, standing order No.07/2003 and Act-IV of 2005 Khyber Pakhtunkhwa (Validation of standing order Act, 2005). The case of the present petitioners are similar and identical both on factual as well as legal point and reference to those petitioners, who's writ petition bearing No.3386-

ATTESTED

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P/2016 decided on 25.10.2016, WP No.628-P/2014, WP No.395-P/2017 decided on 22.02.2018 has been allowed by this Hon'ble Court, therefore, the petitioners also deserve to be treated similarly and are entitled to be allowed to join the forth coming schedule Intermediate School Training at PTC Hangu commencing from 10.05.2018."

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2. In essence, petitioners are employees of the respondent department, serving as Drill Instructors in the Police Training College/Center at Hangu. Their grievance as gleaned out from the contents of this writ was despite the fact that they had already completed the prescribed length of service as Drill Instructors in view of Standing Order No.11/87, Standing Order No.7/2003 and the Government of Khyber Pakhtunkhwa Act-IV of 2005 (Validation of Standing Order Act, 2005) but they were not enlisted for the Intermediate School Training.

3. The respondents were summoned, who submitted their comments, whereby on one hand they took the ground that the cases of the petitioners not covered under Standing Order 7 of 2003 and 11 of 1987 as well as validation of Standing Order Act-IV of 2005 as petitioners were not cadet law instructors while on the other hand they had taken refuge behind

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the judgment of the Apex Court, whereby out of turn promotion was highly deprecated.

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4. This Court while deciding WP No.3386-P/2016 and similar nature other writ petitions were allowed cadet at par with the petitioners to join the Intermediate Course, reference at this stage be given in WP No.628-P/2014, and WP No.395-P/2017 titled Khalil ur Rehman Vs Provincial Police Officer and the Standing Order 2 of 2012, whereby at Para No.2 it has been decided by the respondents that incentive to the officers posted as PTC Hangu which reads as under:

"i. Such instructors may become eligible to be included in Lower Intermediate and Upper College Courses after completion of three (3) years period and earning satisfactory ACRs.

ii. The incentive can be availed once during the career.

iii. There should be a mechanism for selecting such candidates preferably through a board of officers including the officers from CPO.

iv. It was further decided that the officers selected for such courses will not get out of turn promotion and the seniority list of other officers shall not be affected in any way."

5. Keeping in view the judgment of this Court as well as Standing Order 2 of 2012, this writ petition is disposed of in term that the respondents are

ATTESTED

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directed to consider their cases in view of judgment of this Court referred hereinabove and Standing Order No.2 of 2012 as well as the relevant Rules in vogue.

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Announced:
22.05.2019

[Signature]
JUDGE

[Signature]
JUDGE

(DB) Hon'ble Mr. Justice Nazimullah Khan & Hon'ble Justice Musarrat Hossain

Dusan

ATTESTED
[Signature]



15
OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

39

No. 4461 Legal dated Peshawar, the // 10/09/2019.

To: - The Commandant,
Police Training College Hangu.

Subject:- COMMITTEE MEETING

Memo:- Kindly refer to your office letter No.674-77/PA dated 03.09.2019 on the subject cited above.

Petitioners Javed Nasir, Constable and 02 officers, drill instructor at PTS Swabi have lodged writ petition No. JJG3-P/2018 with the following prayers:-

"On acceptance of this instant writ petition this Hon'ble Court may graciously be please to declare the act of the respondents as unlawful and illegal by not allowing the petitioners to join the forth coming Intermediate Training Course which was to be commenced w.e.f 03.07.2018 and to direct the respondents to allow the petitioners to join the Lower Training Course at Police Training College/Center, Hangu as per their eligibilities and entitlement under the provision of standing order No. 17/2014 of the office of Inspector General of Police Khyber Pakhtunkhwa. The case of the present petitioners are similar and identical both on factual as well as legal point and reference to those who has been allowed by the respondents, therefore, the petitioners also deserve to be treated similarly and are entitled to be allowed to join the forth coming schedule Lower Course Training at PTC Hangu commencing from 03.07.2018."

The case was pursued by DSP Legal, PTC Hangu.

The honorable court vide judgment dated 15.05.2019 disposed off the writ petitions in the following terms:

Operative Para 4 & 5 of the judgment are reproduced as under:-

"This court while deciding WP No. 3386-P/2016 and similar nature other writ petitions were allowed eader at par with the petitioners to join the Intermediate Course, reference at this stage be given in WP No. 628-P/2014 and WP No. 395-P/2017 titled Khalil-ur-Rehman Vs Provincial Police Officer and the Standing Order 2 of 2012, whereby at Para No. 2 it has been decided by the respondents that incentive to the officers posted as PTC Hangu which needs as under:

- i. Such instructors may become eligible to be included in Lower Intermediate and Upper College Courses after completion of three (3) years period and earning satisfactory ACRs.
- ii. The incentive can be availed once during the career.
- iii. There should be a mechanism for selecting such candidates preferably through a board of officers including the officers from GPO.
- iv. It was further decided that the officers selected for such courses will not get out of turn promotion and the seniority list of other officers shall not be affected.

Keeping in view the judgment of this Court as well as Standing Order 2

of 2012, this writ petition is disposed of in term that the respondents are directed to consider their cases in view of judgment of this Court referred hereinabove and Standing Order No. 2 of 2012 as well as the relevant Rule in Vogue."

ATTESTED

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Scrutiny Committee, law department was approached to examine the case for lodging CPLA against the impugned judgment but it was returned vide Minutes of Meeting.

It is worth mentioning that in the light of Supreme Court judgment dated 13.05.2018 on "Out of Turn Promotion" a Committee was constituted at CPO level to examine all the Standing Orders referred to above and the committee under the chairmanship of Commandant PTC Hangu recommended withdrawal of all standing orders. However the Competent Authority remanded the case back to the Committee for revision.

The Competent Authority has directed the committee to resolve the issue at earliest.

In the meanwhile to consider the petitioners in term of Para 4 & 5 of the judgment, as approved by the Competent Authority.

[Signature]
AIG/Legal,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

No. 4462-63 Legal

Copy of the above is forwarded for information to the:-

- 1 Deputy Inspector General of Police Telecommunication Khyber Pakhtunkhwa Peshawar.
- 2 Deputy Inspector General of Police, Training, CPO, Peshawar.
- 3 AIG Establishment CPO Peshawar.

[Signature]
AIG/Legal,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

OFFICER OF THE DY. INSPECTOR GENERAL OF POLICE TRAINING
KHYBER PAKHTUNKHWA, PESHAWAR

No. 7441 Trg dated Peshawar the 18/09/2019.

Copy of above is forwarded to the Director PTS Swabi for further necessary action.

[Signature]
MUTTAHAR UDDIN (PSI)
Assistant Inspector General of Police,
Training
Khyber Pakhtunkhwa Peshawar

ATTESTED

[Signature]

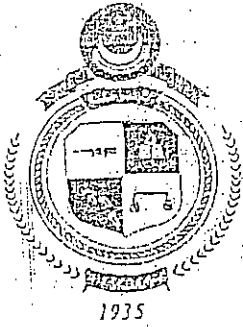
فہرست برائے انٹرمیڈیٹ کورس کو ایفائیڈ کیڈٹ لاء انسٹرکٹرز

نمبر شمار	نام، نمبر عہدہ	ضلع	کورس	تاریخ شمولیت کورس
1	فیاض خان نمبر HC	پشاور	انٹرمیڈیٹ	16.05.2018
2	عطاء اللہ نمبر HC	کرک	انٹرمیڈیٹ	04.09.2018
3	وقار احمد نمبر HC	ڈی آئی خان	انٹرمیڈیٹ	15.08.2018
4	نوشین صدیقی L-HC	ڈی آئی خان	انٹرمیڈیٹ	15.08.2018
5	ساجد حیات نمبر HC	دیر لویئر	انٹرمیڈیٹ	03.12.2018
6	جوہر اعظم نمبر HC	مردان	انٹرمیڈیٹ	03.12.2018
7	فضل دیان نمبر HC	دیر لویئر	انٹرمیڈیٹ	03.12.2018

ATTESTED

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Ph # 0925-621886
Fax # 0925-620886

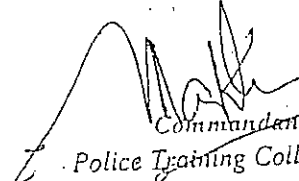
Office Of The Commandant Police Training College Hangu.

ORDER.

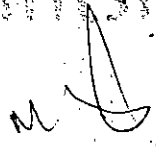
Consequent upon completion of 03 years mandatory period, Head Constable Fayaz Khan No. 91 of CCP Peshawar serving at PTC Hangu as Cadet Law Instructor is hereby allowed to join the on-coming intermediate college course as provided in Standing Order No. 07/2003. However, he shall complete the past duration of course i.e 02 months and 05 days.

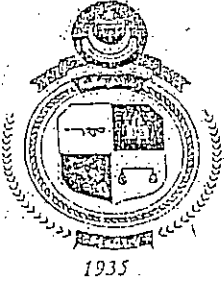
OB No. 190

Dated. 16/05/2018.


Commandant
Police Training College, Hangu.

ATTESTED





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Office Of The Commandant Police Training College Hangu.

ORDER.

Consequent upon completion of 03 years mandatory period, Head Constable Attaullah of Karak district, presently serving at PTS Kohat as Cadet Law Instructor is hereby allowed to join the forth coming intermediate college course on 04.09.2018 as provided in Standing Order No. 07/2003. However, he shall complete the past course duration.

OB No. 251

Dated 03/08/2018.

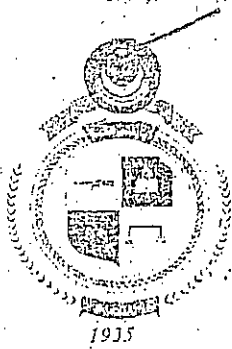
M. A. Khan
Commandant
Police Training College, Hangu.

No. 805 /EC, dated Hangu the 06/08/2018.

Copy to Director, PTS Kohat w/r to his Memo: No. 460/EC, dated 11.07.2018.

ATTESTED

M. A. Khan



P 52

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Ph # 0925-621886
Fax # 0925-623236

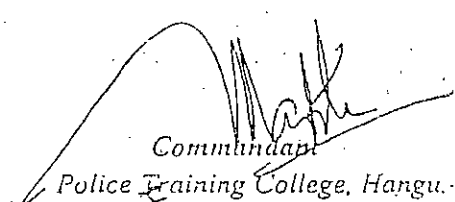
Office Of The Commandant, Police Training College Hangu.

ORDER.

Consequent upon completion of 03 years mandatory period, Head Constable Waqar Ahmad No. 93 of DI-Khan district, presently serving at PTS Kohat as Cadet Law Instructor is hereby allowed to join the forth coming intermediate college course expected to be commenced between 15 to 20 August, 2018 as provided in Standing Order No. 07/2003.


OB No. 260

Dated 06/08 /2018.


Commandant
Police Training College, Hangu.

No. 894 /EC, Dated: Hangu the, 15 /08 /2018.

Copy to Director, PTS Kohat with reference to his Memo No. 461/HC, Dated 11.07.2018.


Commandant
Police Training Coliege, Hangu.

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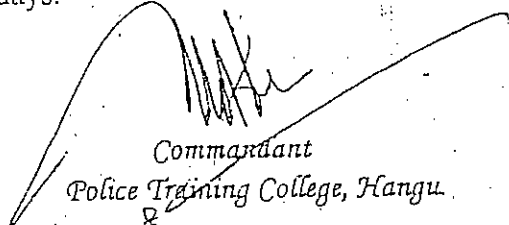
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Ph # 0925-621886
Fax # 0925-623236

Office Of The Commandant Police Training College Hangu.

ORDER.

Lady Head Constable Nousheen Siddiqui of DI-Khan district serving at PTC Hangu as Cadet Law Instructor under Standing Order No. 07/2003 since, 15.09.2015 is hereby allowed to join the ongoing intermediate college course with effect from 15.09.2018. However, she will complete the remaining portion of the course i.e 29 days.


Commandant
Police Training College, Hangu.

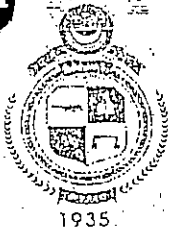
OB No. 286
Dt: 29/08/2018.

No. 321-24-IEC, dated Hangu, the 30/8/2018.
Copy to, SP Admin, SRC, CLI, Reader for necessary action.

Commandant
Police Training College, Hangu.

ATTESTED

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Ph # 0925-690236

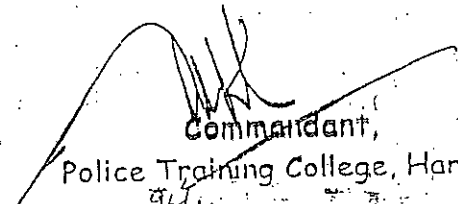
Fax # 0925-620886

OFFICE OF THE COMMANDANT POLICE TRAINING COLLEGE HANGU

ORDER

Consequent upon completion of 03 years mandatory period, the following Head Constables serving as Cadet Law Instructors in PTC Hangu under S.Os 11/1987 & 07/2003 are hereby allowed to join the in-coming intermediate college course:-

- i. HC Sajid Hayat, No. 84
- ii. HC Johar Azam, No. 93
- iii. HC Fazal Deyan, No. 136


Commandant,
Police Training College, Hangu.

O.B. 388

Dated: 03/12/2018.

No. 1398-1407 /EC, dated Hangu, the November 04/12/2018.

Copy forwarded to all concerned for compliance and further necessary action.

ATTESTED


VAKALATNAMA

Before the KP Service Tribunal, Peshawar

_____ OF 2019

Abid Ullah Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Abid Ullah Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. _____/_____/2019



CLIENT


ACCEPTED
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

&


MIR ZAMAN SAFI
ADVOCATES

OFFICE:
Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Mobile No.0345-9383141

BEFORE THE HONORABLE KHAYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1282/2020.

Abidullah AST

Versus

The Provincial Police Officer

& others

.....Petitioner

.....Respondents

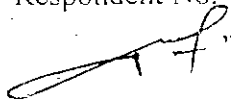
→→→

INDEX

S#	Description of the documents	pages
1	Copy of Para wise Comments	1-2
2	Authority letter	3
3	Affidavit	4
4	Service record	5

Dated: 26.08.2020

Respondent No. 1, 2 & 3



Through:-

Inspector Legal
Tariq Umar
PTC Hangu

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Service Appeal No. 1282/2020

Abid ullah ASI, PTC HanguAppellant

Versus

Inspector General of Police, KPK Peshawar etc... Respondents.

REPLY BY RESPONDENTS 1,2 &3.

Preliminary Objections:-

- i. That the appeal is not based on facts.
- ii. That the appeal is not maintainable in its present form.
- iii. That the appeal is bad for non joinder and misjoinder of unnecessary parties.
- iv. That the appellant has got no cause of action or locus standi.
- v. That the appeal is bad in law, hence not maintainable.
- vi. That the appellant has not come to this Honorable Tribunal with clean hands.

FACTS:

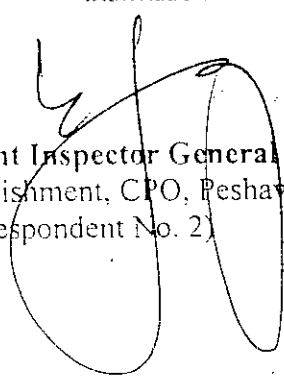
1. Pertains to record, hence no comments.
2. Correct, that the Standing Order No. 11/1987 provides incentives to instructors but the same have been clogged after the judgment of the Supreme Court of Pakistan noted as 2013 SCMR 1752 and 2018 SCMR 1218 dated 13.05.2018. Furthermore, the appellant's seniority + promotion relates to Bannu Region / District and he will serve in PTC for specific period.
3. Correct to the extent, but the same have been clogged as discussed in Para 2 above as far as the Standing Order 17/2014 referred in the said is concerned that relates to physical training instructors while the petitioners are cadet law instructors.
4. Correct to the extent, that the Standing order 11/1987 has been validated through an Act, but the same loses its effect after announcement of the judgments by the Apex Court of Pakistan in respect of out of turn promotion.
5. Pertains to the terms and conditions of service.
6. Pertains to record, hence no comments.
7. Correct that the appellant was promoted to the rank of ASI, but now after the judgment it comes within the ambit of out of turn promotion. He will be promoted on the basis of Region seniority cum fitness.
8. Correct the notification was issued in light of the decision of the Apex Court discussed in Para 2 above.
9. Correct that the Notification dated 10.01.2019 was held in abeyance through another Notification dated 17.01.2019, but the Supreme Court Judgment is still in existence.
10. Incorrect. Under rules, he will put departmental appeal to his Region being competent authority for disposal.

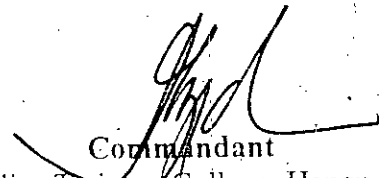
GROUND:

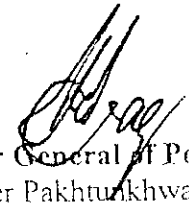
- A. Incorrect. The judgments of the Apex Court are still in existence whose compliance is still under process.

- B. Incorrect. The appellant has been treated in accordance with law, rules and the Article 4, 25 & 27 of the Constitution of Pakistan were not violated in any manner by the respondents.
- C. Incorrect. No malafide manner has been adopted by the respondents.
- D. Correct to the extent, that the appellant has got good ACRs but his promotion will come within the ambit of out of turn promotion which has been declared as illegal and unconstitutional by the Supreme Court of Pakistan. Furthermore, he will be considered for promotion by his Region i.e Bannu on the basis of seniority cum fitness.
- E. The writ petition No. 395-P/2017, 2189-P/2018 and 3263-P/2018 relates for inclusion into Intermediate and Lower College Course but not for confirmation purpose.
- F. Incorrect. The colleagues of the appellant referred by him have completed their tenure and as per available record they were confirmed by their respective region on the basis of seniority cum fitness and not by the PTC authority however the implementation of the judgments of the Apex Court is under process.
- G. The respondents will provide further proofs relating to the matter at the time of arguments before the Honorable Tribunal.

Prayer: Keeping in view the above facts, humbly prayed that the appeal of the appellant is not based on facts may kindly be dismissed with costs.


Assistant Inspector General of Police
Establishment, CPO, Peshawar
(Respondent No. 2)


Commandant
Police Training College, Hangu
(Respondent No. 3)


Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 1)

BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1282/2020

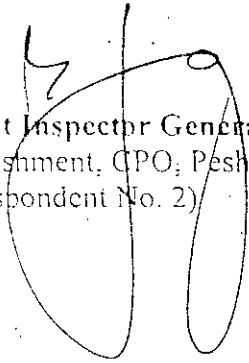
Abid Ullah AST.....Appellant

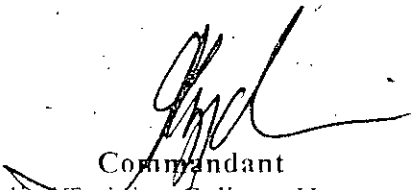
Versus


Inspector General of Police Khyber Pakhtunkhwa Peshawar etc....Respondents

AUTHORITY LETTER

We respondent No. 1,2 & 3 do hereby authorized and allow Mr. Tariq Umar Inspector Legal to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar on our behalf in connection with the Service Appeal No. 1282/2020 title as above and do whatever is needed in the Honorable Tribunal.


Assistant Inspector General of Police
Establishment, CPO, Peshawar
(Respondent No. 2)


Commandant
Police Training College, Hangu
(Respondent No. 3)


Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 1)

BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 1282/2020

Abid ullah ASI.....Appellant

Versus

Provincial Police Officer, Khyber Pakhtunkhwa Peshawar etc.... Respondents

AFFIDAVIT

I Tariq Umar Inspector Legal, PTC Hangu do hereby solemnly declare on oath that the content of Parawise comments submitted in reply to the Service Appeal No. 1282/2020 title as above are correct to the best of our knowledge, belief and nothing have been concealed from the Honorable Tribunal.

DEPONENT



TARIQ UMAR
Inspector/ Legal
Police Training College Hangu
17301-4997553-7

BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No1282/2020

Abid ullah ASI.....Appellant

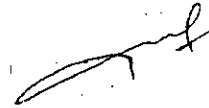
Versus

Provincial Police Officer, Khyber Pakhtunkhwa Peshawar etc....Respondents

AFFIDAVIT

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DEPONENT



TARIQ UMAR
Inspector/ Legal
Police Training College Hangu
17301-4997553-7