


FORM OF ORDER SHEET

Court of _____

Appeal No. 1104/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/05/2023	<p>The appeal of Mr. Kamal ud Din resubmitted today by Mr. Mian Muhammad Imran Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on-</p> <p>_____</p> <p>By the order of Chairman</p> <p></p> <p>For REGISTRAR</p>

The appeal of Mr. ^{revised} Judd Din Driver Governor House Peshawar received today i.e. on 26.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellant.
- 2- Annexures of the appeal are not attested.
- 3- Appeal has not been flagged/marked with annexures, marks.
- 4- Copy of rules mentioned in para-E of the grounds of the memo of appeal (Annexure-E) is not attached with the appeal which may be placed on it.
- 5- Page nos: 6, 12, 17, 19, 20, 23, 27 & 28 of the appeal are illegible which may be replaced by legible/better one.
- 6- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1345 /S.T,

Dt. 5/5 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mian Muhammad Imran Adv.
High Court Peshawar.

*Respected Sir,
The deficiencies have been
rectified & re submitted please*

*M M Imran
Adv*

BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1104 /2023

Kamal ud Din (Driver) (BPS-6), Governor's House Peshawar

....Appellant

VS

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar Et. Al.

...Respondents

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Through



(Mian Muhammad Imran)
Advocate High Court
BC-13-4213
0333-9577770 0333-9274073

①

BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2023

Kamal ud Din (Driver) (BPS-6), Governor's House Peshawar

.....Appellant

VS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
2. Chief Secretary, Khyber Pakhtunkhwa, Peshawar
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat Peshawar
4. Secretary to Government of Khyber Pakhtunkhwa, Administration Department, Civil Secretariat Peshawar
5. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat Peshawar
6. Secretary to Governor, Governor's Secretariat Peshawar
7. Military Secretary to Governor(MSG), Governor's House Peshawar

...Respondents

APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR INCLUSION OF THE APPELLANT IN THE SENIORITY MAINTAINED FOR THE DRIVERS OF THE ESTABLISHMENT & ADMINISTRATION DEPARTMENT IN CIVIL SECRETARIAT PESHAWAR KEEPING IN VIEW THE PROBITY THAT THE APPELLANT HAS SUBMITTED HIS DEPARTMENTAL APPEAL ON 27/12/2022 BUT HITHERTO, NO RESPONSE OR REPLY HAS BEEN RECEIVED & TO SET-ASIDE ANY ORDER IF ISSUED IN RESPONSE OF DEPARTMENTAL

**APPEAL DATED: 27/12/2022 BUT NOT COMMUNICATED, IF
DETRIMENTAL, TO THE INTEREST OF THE APPELLANT & NOT SYNC
WITH THE CIRMUNSTANCES**

The Appellant is pleased to beseech before this Honorable Tribunal as under;

1. That the Appellant got appointed on the post of "Driver" (BPS-04) on 01.08.2007 in the Governor's House Peshawar. With the flow of time, he got upgraded to BPS-06 based on the Khyber Pakhtunkhwa Finance Department Notification/Circular. It is also axiomatic to submit that the Appellant is a Civil Servant, holding a civil post in connection with the affairs of the province as defined by Section 2(b) of the Khyber Pakhtunkhwa Civil Servants Act, 1973. (Copy of Appointment Order & Pay Slip is attached as F/A)
2. That since inception of his service, the Appellant has not been given any promotion because of absence of proper service structure.
3. That it is also axiomatic to submit that even there is no concept of seniority in the Governor's House Peshawar because no seniority list of the Drivers has been introduced, prepared or maintained hitherto.
4. That in order to get promotion vistas via getting opportunity to be included in the seniority list of the Drivers of the Civil Secretariat, the Appellant submitted his departmental appeal to the competent authority on 27/12/2022 which was duly diarized. Despite the passage of more than three months, no response or reply has been received. (Copy of the Departmental Appeal is attached as F/B)
5. That feeling badly peeved, the Appellant being a Civil Servant, has utilized and complied with the command provided by Section 04 of the K-P Service Tribunal Act, 1974 by filing his departmental appeal on 27/12/2022 but no response has been received even after the flow of more than 03 months, hence, the instant appeal on the following grounds *inter-alia*;

GROUNDS:

- A. That act/omission and inaction on the part of Respondents not to include the Appellant in the seniority of Civil Secretariat Drivers is void ab-initio, unlawful, illegal and against the mandate of Article 04, 09, 25 and 27 of the Constitution of Islamic Republic of Pakistan 1973.

- B. It is an established principle that every civil servant has got "Legitimate Expectations" to have promotion prospects and to have fair opportunities regarding promotion but the Appellant has been deprived because of absence of any service structure within the Governor's House, so to include the Appellant in the seniority of the "Drivers" of the Civil Secretariat would be tantamount to a *silver lining and breaking in the clouds*.
- C. That it is legit to submit before this Honorable Tribunal that previously, a number of employees appointed in the "Governor's House" have been included in the seniority of their counterparts in Civil Secretariat Peshawar. Even, later on, they got promotions and currently serving on different posts within the Civil Secretariat. (Copy of the Appointment Orders etc is attached as F/C)
- D. That axiomatic is to submit that by placing the Drivers of the Civil Secretariat and Governor's House Peshawar at *juxta-position*, it would be evident that there is not even a speck of difference in the job-description and performance of duties. All the perks and privileges which are being taken and enjoyed by the Civil Secretariat Drivers are equivalent to the Appellant's. Thus, the Appellant is entitled to be included in the seniority of the Drivers of Civil Secretariat Peshawar.
- E. That it is further essential to submit that the Drivers serving in the Civil Secretariat Peshawar have got promotion opportunities as they have proper service structure and promotion opportunities like if any person is appointed as a "Driver", he gets promotion to the post of "Senior Driver" followed by "Supervisor" (BPS-08) and then "Garage Superintendent" (BPS-16). In the case of the Appellant, there is no service structure and promotion opportunities, hence, the Appellant needs to be included in the seniority of the Civil Secretariat Drivers. (Copy of Civil Secretariat Drivers Appointment Rules & Creation of different posts of Garage Superintendent is attached as F/D & Pay Slips of Secretariat Drivers is attached as F/E)
- F. That it is further legit to submit that the Appellant is a household staff of the Governor's House Peshawar and serving with profound zeal and zest since inception of his service. Recently, in the near past on 08/05/2018, a departmental promotion

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committee (DPC) meeting was conducted in the Establishment & Administration Department Civil Secretariat Peshawar where the house-hold staff has been declared Civil Servants and endorsed the fact that they be governed under the Civil Servants Act, 1973 and other applicable rules. It is also added that Class-IV house-hold staff were allowed to be included in the seniority list of the Civil Secretariat Class-IV staff. It is also added that even Class-IV staff also got promotion to the post of "Daftaris" and "Junior Clerks". Hence, the Appellant is entitled to be included in the seniority of the Civil Secretariat drivers. (Copy of the DPC Meeting is attached as F/F)

G. That even a number of Governor's House drivers have been transferred at different intervals to the Civil Secretariat which is endorsement of the fact that there is no difference among the Governor's House drivers and Civil Secretariat drivers. If they can be transferred to the Secretariat, why not they are included in the seniority of Civil Secretariat drivers? (Copy of Transfer Orders of other Governor's House Employees is attached as F/G)

H. That the mandate of Article 25 of the Constitution of Islamic Republic of Pakistan 1973 is to provide equal opportunities and treatment to the similar placed persons and are required to be dealt with the same yardstick. The difference can only be made based on "Intelligible Differentia". The issue in hand is a classic example of discrimination because other similar employees have been given opportunity to be included in the seniority of Civil Secretariat while the Appellant has been left *in lurch*. Thus, the Appellant is entitled to be included in the Seniority of Civil Secretariat Drivers.

I. That Section 08 of the KP CSA 1973 in an un-equivocal terms provides that the seniority of Civil Servants shall be reckoned in relation to other Civil Servants belonging to the same service or cadre, whether serving in the same department or office or not. The Appellant is a Civil Servant and serving as a "Driver" in BPS-06 in Governor's House Peshawar needs to be included in the seniority of the Drivers of Civil Secretariat.

J. That any other ground can be raised at the time of arguments.

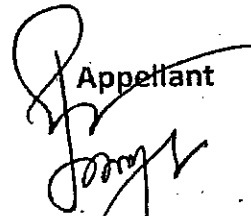
5

PRAYER:

In light of the foregoing submissions, it is therefore, most convivially and humbly prayed that on acceptance of the instant service appeal, this Honorable Tribunal may graciously be pleased to direct the Respondents to include the Appellant in the seniority maintained for the "Drivers" of Civil Secretariat Peshawar and any order, if available and not communicated to the Appellant in response to his departmental appeal Dated: 27/12/2022, if detrimental, may also be set-aside please.

Any other relief may also be awarded to the Appellant against the Respondents.

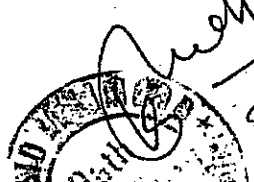
Through


Appellant

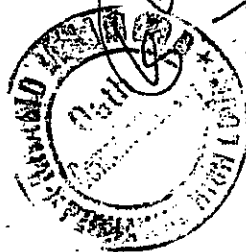
(Mian Muhammad Imran)
Advocate High Court
BC-13-4213
0333-9577770 * 0333-9274073

Affidavit:

I, Kamal ud Din (Driver) Governor's House Peshawar do hereby solemnly affirm and declare that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal. This is the 1st appeal having the same subject-matter.


26-4-23

Deponent



ORDER

No. SO/MSG/GH/2007. The following persons are appointed against the vacant posts mentioned in serials noted against each in the Governor's House, Peshawar, vide G.O. No. 018-2008 on the terms and conditions given below:

- i. Mr. Said Rehman, Cleaner, Governor's House, Peshawar. Driver (BPS-4)
- ii. Mr. Kamal-ud-Din S/O Milan Daud, Resident of Bkaghund Mohmand Agency. Driver (BPS-4)
- iii. Mr. Muhammad Shafiq S/O Muhammad Rafique, Resident of Dara Adam Kheil, TR Kohat. Cleaner (BPS-1)

TERMS & CONDITIONS.

- i. Their appointment is purely temporary and their services are liable to be terminated without assigning any reason.
- ii. In case they wish to resign from service, 15 days advance notice will be necessary or in lieu thereof 15 days pay shall be forfeited.
- iii. They will be entitled for Conveyance, Medical, House Rent Allowances, T/A/D/A and leave as per Government rules.
- iv. They will not be entitled to Pension or Gratuity. They shall however, be entitled to Contributory Provident Fund in terms of Civil Servants Amendment Act 2005 (NWFP Act No. IX of 2005).
- v. Their appointment is subject to the production of Medical Fitness Certificate from the Civil Surgeon, Peshawar.

Military Secretary to Governor NWFP

Endst. No. SO/MSG/GH/2007. Dated 21 July, 2007.

Copy forwarded for information and necessary action to:-

- 1. The Accountant General NWFP Peshawar.
- 2. The Comptroller, Governor's House, Peshawar.
- 3. The ADC to Governor, Governor's House, Peshawar.
- 4. The Section Officer (B&A), Governor's House Peshawar.
- 5. PS to MSG, Governor's House Peshawar.
- 6. Bill Assistant, Governor's House, Peshawar.
- 7. Individuals Concerned.
- 8. Personal Files.

Section Officer to MSG

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (December-2020)



(Handwritten initials)

→ Personal Information of Mr KAMAL UD DIN d/w/s of MIAN MUHAMMAD DAUD
Personnel Number: 00371048 CNIC: 2140759516481 NTN:
Date of Birth: 20.11.1982 Entry into Govt. Service: 01.08.2007 Length of Service: 13 Years 05 Months 001 Days

(Handwritten number 7)

Employment Category: Active Temporary
Designation: DRIVER : 80003814-GOVERNMENT OF KHYBER PAKH
DDO Code: FR4009-SECTION OFFICER (B&A) GOVERNOR'S HOUSE PESHAWAR
Payroll Section: 005 GPF Section: 002 Cash Center:
GPF A/C No: 371048 Interest Applied: Yes GPF Balance: 180,214.00
Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 06 Pay Stage: 13

Wage type	Amount	Wage type	Amount
0001 Basic Pay	17,900.00	1210 Convey Allowance 2005	1,932.00
1300 Medical Allowance	1,500.00	1580 Overtime Allowance	2,000.00
2148 15% Adhoc Relief All-2013	352.00	2199 Adhoc Relief Allow @10%	256.00
2211 Adhoc Relief All 2016 10%	1,313.00	2224 Adhoc Relief All 2017 10%	1,790.00
2247 Adhoc Relief All 2018 10%	1,790.00	2264 Adhoc Relief All 2019 10%	1,790.00
2283 Secretariat Perform Allow	8,950.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3006 GPF Subscription	-950.00	3501 Benevolent Fund	-600.00
4004 R. Benefits & Death Comp:	-450.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax
Payable: 0.00 Recovered till DEC-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 39,573.00 Deductions: (Rs.): -2,000.00 Net Pay: (Rs.): 37,573.00

Payee Name: KAMAL UD DIN
Account Number: 08987900411103
Bank Details: HABIB BANK LIMITED, 220898 POLICE ROAD, PESHAWAR. POLICE ROAD, PESHAWAR., PESHAWAR

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: City: MOHMAND AGENCY Domicile: - Housing Status: No Official
Temp. Address: City: Email: kama1300kpk@gmail.com

(Handwritten signature and initials)

System generated document in accordance with APPM 4.6.12.9(SERVICES/31.12.2020/05-08-29/v2.0)
* All amounts are in Pak Rupees
* Errors & omissions accepted

(B)

(8)

4312
27-12-2022

To

The Worthy Chief Secretary
Khyber Pakhtunkhwa

[Signature] 27/12

Subject:

DEPARTMENTAL APPEAL FOR INCLUSION OF THE
UNDERSIGNED/APPELLANT IN THE SENIORITY LIST OF
THE CIVIL SECRETARIAT DRIVERS IN ORDER TO HAVE
PROMOTION AVENUES/VISTAS KEEPING IN VIEW THE
PROBITY THAT THE ABSENCE OF SERVICE STRUCTURE HAS
BEEN CAUSING INSURMOUNTABLE HARDSHIPS FOR THE
APPELLANT

[Handwritten initials]

Respected Sir,

The appellant is pleased to beseech as under;

1. That the appellant is a Civil Servant, serving as a "Driver" in the Governor's House Peshawar, and being dealt/governed by the "Civil Servants Act, 1973".
2. That it is indispensable to submit that since inception of his service, the appellant has not been promoted due to the absence of service structure.
3. That axiomatic is to submit that by placing the Drivers of the Civil Secretariat and Governor's House Peshawar at juxta-position, it would be evident that there is not even an iota and speck of difference in the job description and performance of duties. Both the set of employees are being governed under the "Civil Servant Act, 1973" and have been bestowed upon the same benefits including the "Secretariat Performance Allowance".
4. That un-skeptically, every Civil Servant has got the "Legitimate Expectation" to have promotion prospects and to have fair opportunities to get promotion but the appellant has been deprived of the same due to the absence of any service structure.
5. That it is further necessary to be added that the "Drivers" serving in the Civil Secretariat have got promotion opportunities as they have proper service structure and promotion opportunities like if any person is appointed as a "Driver" in the Civil Secretariat, he gets promotion to the post of "Senior Driver" followed by Supervisor(BPS-08) and then "Garage Superintendent" (BPS-16). It is also submitted that about 05 posts of "Garage Superintendent" (BPS-16) have been created for the Secretariat

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Drivers by the Finance Department vide Dated: 26/02/2018 which are no doubt, greatly beneficial but on the other side, the absence of service structure for the appellant has been causing gigantic impediments in the way of the appellant's legitimate expectancy regarding promotion which is required to be resolved.

6. That it is further legit to submit that the appellant is a house-hold staff of the Governor's House Peshawar and serving with profound zeal and zest since inception of his service. Recently in the near past on 08/05/2018, a Departmental Promotion Committee (DPC) meeting was conducted in the Establishment & Administration Department Civil Secretariat Peshawar where the House-Hold Staff serving under the Civil Secretariat have been declared Civil Servants and endorsed the fact that they be governed under Civil Servants Act 1973 and all the other laws and rules applicable on the Civil Servants. It is also added that the Class-IV House-Hold Staff were also allowed to be included in the seniority list of the Civil Secretariat Class-IV staff. It is further added that even the Class-IV House-Hold staff were also promoted to the post of "Daftaris" followed by "Junior Clerks".
7. That it is important to submit that the appellant has got every right to be included in the seniority list of the secretariat drivers because already, the house-hold staff has been included and even been promoted to the higher posts, thus, the rights of the appellant has been violated by not incorporating him in the aforesaid seniority list.
8. That it is further added that a number of Drivers from the Governor's House have also been transferred to the Civil Secretariat which is endorsement of the fact that there is no difference among the Governor's House Drivers and Secretariat Drivers. If they can be transferred to the Secretariat, then why not they be included in the Civil Secretariat Drivers seniority list keeping in view the probity that there is no service structure exist for the appellant which is tantamount to violation of the fundamental rights of the appellant.
9. That the absence of service structure is associated with great deal of problems and issues, both regarding career as well as mental agonies, which can only be resolved either by incorporating the appellant in the seniority list of the secretariat

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drivers or formulation of service structure for the Governor's House Drivers.

10. That the mandate of Article 25 of Constitution of Islamic Republic of Pakistan 1973 is to provide equal opportunities to the similar placed persons and are required to be dealt with the same yardstick. The difference can only be made based on "Doctrine of Intelligible Differentia". The issue in hand is a classic example of discrimination because neither the appellant is allowed to be incorporated in the seniority list of the Secretariat Drivers nor there is any service structure while on the other hand, the Secretariat Drivers have been blessed with promotion prospective/vista as well as service structure. The appellant has been badly discriminated.

In light of the foregoing submissions, it is therefore most humbly requested that on acceptance of the instant departmental appeal, direction may kindly be given for the incorporation/inclusion of the appellant in the seniority list of the Civil Secretariat Drivers so that the Appellant may have opportunity of promotion please.

Dated:

27/12/02

KA

(Kamal ud Din)

Driver

Governor's House Peshawar

CNIC No. 21407-5951648-1

Cell No. 03339142616



11

MILITARY SECRETARY
GOVERNOR'S HOUSE
PESHAWAR

No. MSG/GH/NWFP/2000
22 Sept, 2000

ETA

Amo

OFFICE ORDER

The Governor NWFP has been pleased to appoint Mr. Mohammad Sabir S/O. Abdur Rehman of Village Pahar Bandi Tehsil & District Abbottabad as Naib Qasid in relaxation of ban with effect from 01-10-2000 against the post of Mr. Mumtaz Ali Naib Qasid who has been terminated vide order No. MSG/GH/NWFP/2000 dated 22 Sept, 2000 in BPS-01 plus usual allowances as admissible under the rules.

In case he wishes to resign at any time 15 days notice will be necessary or in lieu thereof 15 days pay may be forfeited.

His appointment is purely temporary and his services are liable to be terminated without assigning any reasons.

His appointment is subject to the production of Medical Fitness Certificate from the Civil Surgeon Peshawar.

M. Sabir
M/Q
22/9/2000
by
MSG

Valer
Lt Col
(Naseem Anwar Hatt)
Military Secretary to Governor NWFP

No. & date even.

Copy forwarded to the:-

1. The Accountant General NWFP Peshawar for n/a please.
2. Comptroller, Governor's House, Peshawar.
3. Accountant, Governor's House, Peshawar.
4. Official concerned.
5. Personal file.
6. Order of the day file.



GOVERNMENT OF NWFP
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

12

Dated Peshawar, the 13th March, 2009

ORDER

No. SOE.IV (E&AD) 1-7/2009-

On the recommendations of the Departmental Promotion Committee, the following Daftraries/Naiib Qasid of the Civil Secretariat, NWFP, are hereby appointed as Junior Clerks (BS-07), on acting charge basis, with immediate effect:-

S. No	Name
1.	Mr. Hashim Ali
2.	Mr. Hazratullah
3.	Mr. Muhammad Fayyaz
4.	Mr. Gul Hassan
5.	Mr. Muhammad Fasteem Tahseer
6.	Mr. Muhammad Younas
7.	Mr. Faisal Sarwar
8.	Mr. Zahir Shah
9.	Mr. Aftab Ahmad
10.	Mr. Muhammad Shabir Sabir
11.	Mr. Bakhciar Khan
12.	Mr. Inayat ur Rehman
13.	Mr. Zar Taj Wali
14.	Mr. Imran Ahmad

Mr. Sabir promoted as title on 13/3/2009 on acting charge of Secy Estab.
order of Secy

Promoted as title

Consequent upon their appointments as Junior Clerks (BS-07) on acting charge basis, the following transfers/postings are hereby ordered with immediate effect:-

S.No	Name	From	To
1.	Mr. Hashim Ali	Irrigation Deptt.	Retained in Irrigation Department
2.	Mr. Hazratullah	Industries Deptt.	Finance Department
3.	Mr. Muhammad Fayyaz	C.M's Secretariat	Establishment Deptt.
4.	Mr. Gul Hassan	Local Govt. Deptt.	Retained in Local Govt Department
5.	Mr. Muhammad Tehseen	Admn. Department	Establishment Deptt.
6.	Mr. Muhammad Younas	Irrigation Deptt.	Excise & Taxation Department
7.	Mr. Faisal Sarwar	Establishment Deptt	Retained in Establishment Deptt.
8.	Mr. Zahir Shah	S.T.I	Retained in S.T.I
9.	Mr. Aftab Ahmad	Establishment Deptt	Retained in Establishment Deptt.

SECRETARY ESTABLISHMENT
GOVERNMENT OF NWFP



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

Dated Peshawar, the 12th February, 2011.

ORDER

No. SOE.IV (E&AD) 1-7/2011 - On the recommendations of the Departmental Promotion Committee, the following Acting charge Junior clerks (BPS-07) of the Civil Secretariat, Peshawar are hereby promoted as Junior Clerks (BS-07), on regular basis, with immediate effect:-

S.No	Name	Department
1	Mr. Muhammad Younas	Excise & Taxation Deptt
2	Mr. Faisal Sarwar	E & A Deptt
3	Mr. Zahir Shah	STI, E&A Deptt
4	Mr. Aftab Ahmad	E&A Department
5	Mr. Muhammad Sabir	Governor's House
6	Mr. Bakhtiar Khan	Governor's Sectt
7	Mr. Inayatullah Rehman	Higher Education Deptt
8	Mr. Zartaj Wali	Chief Minister's Sectt
9	Mr. Imran Ahmad S/O Muhammad Afzal	PDMA
10	Mr. Said Karam	Industries Deptt

2. Consequent upon their promotion as Junior Clerks (BS-07) on regular basis, the following postings/transfer are hereby ordered with immediate effect:-

S.No	Name	From	To
1	Mr. Muhammad Younas	Excise & Taxation Deptt	Retained in Excise & Taxation Deptt
2	Mr. Faisal Sarwar	E & A Deptt	Retained in E & A Deptt
3	Mr. Zahir Shah	STI E&A Deptt	Retained in STI E&AD
4	Mr. Aftab Ahmad	E&A Department	Retained in E & A Department
5	Mr. Muhammad Sabir	Governor's House	Retained in Governor's House
6	Mr. Bakhtiar Khan	Governor's Sectt	Retained in Governor's Sectt
7	Mr. Inayatullah Rehman	Higher Education Deptt	Retained in Higher Education Deptt
8	Mr. Zartaj Wali	Chief Minister's Sectt	Retained in Chief Minister's Sectt
9	Mr. Imran Ahmad S/O Muhammad Afzal	PDMA	Retained in PDMA
10	Mr. Said Karam	Industries Deptt	Retained Industries Deptt

SECRETARY ESTABLISHMENT

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

14

MILITARY SECRETARY TO GOVERNOR,
N.W.F.P.



O R D E R.

Mr. Muhammad Latif Son of Mr. Nadir Khan is hereby appointed as a Bashti, in the Governor's House Peshawar against a vacant post on purely temporary basis in B.P.S.01 plus usual allowances as admissible under the rules with effect from 1/2/1995(P.N.).

In case he wishes to resign at any time 15 days notices will be necessary or in lieu thereof 15 days pay may be forfeited.

His appointment is purely temporary and his services are liable to be terminated without assigning any reasons.

His appointment is subject to the production of Medical fitness certificate from the Civil surgeon Peshawar.

Sd/- Lt Col
(Raja Kamran)
Military Secretary to Governor
N.W.F.P.

Dated:- 26 Jan 1995

No. MSG/PF/121

Copy to:-

- 1:- The Accountant General N.W.F.P. for n/a please.
- 2:- The Accountant Governor's House Peshawar.
- 3:- Official concerned.
- 4:- House Supervisor G. House Peshawar.
- 5:- Personal file.
- 6:- Office order file.

M. Latif appointed as
"Bashti" on
26/1/1995 by
MSG

(Amir Afzal Khan)
Comptroller,
Governor's House Pesh.



GOVERNMENT OF N.-W.F.P.
ADMINISTRATION DEPARTMENT

(Handwritten mark)

15

Dated Peshawar the 30.05.2007.

ORDER

No. E&A(AD)4(17)/2006. The following Class-IV officials are hereby promoted to the posts of Daftaries (BS-2) with immediate effect:-

- i. Mr. Muhammad Latif, Bhishti.
- ii. Mr. Muhammad Asif, Naib Qasid.
- iii. Mr. Ajmal Khan, Naib Qasid.

2. Consequent upon their promotion as Daftaries (BS-2), the following postings/transfers are hereby ordered with immediate effect:-

S.NO.	NAME & DESIGNATION	FROM	TO
1.	Mr. Muhammad Latif, Daftari	Governor's House, NWFP ✓	Irrigation Department ✓
2.	Mr. Muhammad Asif, Daftari	-do-	Civil Secretariat, FATA
3.	Mr. Ajmal Khan, Daftari	Finance Department	Local Govt. Department

DEPUTY SECRETARY (ADMN)
ADMINISTRATION DEPARTMENT

EDNST. OF EVEN NO & DATE.

Copy forwarded to the :-

- 1) Accountant General, N-WFP, Peshawar.
- 2) The Section Officer to M.S to Governor, N-WFP.
- 3) The Section Officer (Admn), Governor's Secretariat, NWFP.
- 4) The Section Officer (Admn), Finance Department, Civil Secretariat, FATA.
- 5) The Section Officer (Admn), Finance Department.
- 6) The Section Officer (General), Local Govt. Department.
- 7) The Section Officer (Estr), Irrigation Department.
- 8) P.A to Deputy Secretary (Admn), Admn: Department.
- 9) Officials concerned.

MSG	
SOMSG	21
SO (B&A)	✓
Diary No	123

Shah Jehan
(SHAH JEHAN)

ORDER

16

Mr. Hazratullah son of Qasid Khan r/o village Jamrud, Khyber Agency, Peshawar is hereby appointed as Naib Qasid against a vacant post in BPS-01. Plus usual allowances as admissible under the rules in the Governor's House, Peshawar with effect from 15-09-1997 (F.N), in relaxation of ban by the Governor.

N/A

In case he wishes to resign at any time 15 days notice will be necessary or in lieu thereof 15 days pay may be forfeited.

His appointment is purely temporary and his services are liable to be terminated without assigning any reasons.

His appointment is subject to the production of Medical Fitness certificate from the Civil Surgeon Peshawar.

Sd/- Lt. Col. (S) Mirza
Military Secretary to Governor NWFP

No. MSG/BPS/97/1020-24 Dated 16 Sept. 97

Copy forwarded to :-

1. The Accountant General N.W.F.P. Peshawar for necessary action please.
2. The Accountant, Governor's House, Peshawar
3. Official concerned
4. Personal file.
5. Order of the day file.

[Faint signature and stamp area]

*File to be cancelled
in 90 days
in Peshawar*

17

(Signature)

31/1/09

31/1/2009

ORDER

No.E&A(AD)4(17)/2004. The competent has been pleased to order the promotion of the following matriculate Class-IV Employees (BS-01) of the Civil Secretariat, Department to the post of Daftaries (BS-02) with immediate effect.

Sr No	Name of officials	Department
1.	Ijaz Khan, Naib Qasid	Admn: Deptt:
2.	S.Sakhawat Ali Shah, N/Q	Population Welfare
3.	Farman Ali, Naib Qasid	Sports & Culture
4.	Shahidur Rehman, Naib Qasid	C.M's Secretariat
5.	S.Sarwar Shah, Naib Qasid	F.D (FATA) Sectr:
6.	S.Yousaf Shah, Naib Qasid	Planning & Dev: Department
7.	Zarshad Khan, Naib Qasid	Finance Department
8.	Haider Khan, Naib Qasid	Environment Department
9.	Muhammad Riaz, Naib Qasid	Home & T.As Department
10.	Mohammad Wajid, N/Qasid	Agriculture Department
11.	Wasi Ahmad, Naib Qasid	Health Department
12.	Hashim Ali, N/Qasid	Irrigation & Power Department
13.	Hazratullah, Naib Qasid	Governor's House, NWFP
14.	Abdul Akbar, Naib Qasid	Works & Services Department

- Interview

2. Consequent upon their promotion as Daftaries (BS-02), they are hereby transferred and posted in the departments mentioned against each against the vacant post with immediate effect.

in 2nd

Sr. No	Name of officials	From	To
1.	Mr. Shahidur Rehman	C.M, Sectr., NWFP	Retained in C.M, Sectr., NWFP
2.	Mr. Hazratullah	Governor's House, NWFP	Retained in Governor's House, NWFP
3.	Mr. Ijaz Khan	Admn: Deptt:	Retained in Admn: Deptt:
4.	Mr. Zarshad Khan	Finance Deptt:	Retained in Finance Deptt:
5.	Mr. Abdul Akbar	W&S Deptt:	Finance Department
6.	Mr. Muhammad Riaz	Home & T.As Department	Remined in Home & T.As Department
7.	S.Sakhawat Ali Shah	Population Welfare Deptt:	Home & T.As Department
8.	Mr. Farman Ali	Sports & Culture Department	-do-
9.	Mr. Hashim Ali	Irrigation & Power Deptt:	Retained in Irrigation Department
10.	Mr. Muhammad Wajid	Agriculture Department	Elementary & Secondary Education Department
11.	Mr. Haider Khan	Environment Department	Industries Department

(18) (18)

GOVERNMENT OF NWFP
ADMINISTRATION DEPARTMENT

Dated Peshawar the 19.02.2009.

ORDER

No.E&A(AD)4(3)2008. The following postings/transfers amongst Class-IV are hereby ordered with immediate effect:-

Sr. No.	Name & Designation	From	To
1.	Mr. Hazratullah Daffari	Governor's House	Industries Department
2.	Mr. Khalid Javed, Naib Qasid	E&A Department	Local Govt. Department

DEPUTY SECRETARY (ADMN)
ADMINISTRATION DEPARTMENT

ENST OF EVEN NO & DATE.

Copy forwarded to the :-

- 1) Accountant General, N-WFP, Peshawar.
- 2) Section Officer (Admn), Governor's House, NWFP.
- 3) Section Officer (General), LG & RD Department.
- 4) P.A to DS(Admn), Admn: Department.
- 5) Officials concerned.
- 6) Personal file.
- 7) Office order file.

Ehsan Elahi
(EHSAN ELAHI)
SECTION OFFICER (ADMN)

19

19

Letter No. 19/1977

ORDER

No. S.O. IV (S&GAD) 1-2/97.- On the recommendation of the Departmental Promotion Committee Services and General Admn. Deptt the Competent Authority is pleased to approve the promotion of the following Matriculate Daftaris/Qasids etc. of Civil Secretariat as Junior Clerks (RFS-5) with immediate effect:-

S.No.	Name of Class-IV Employee
1.	Mr. Abdur Rashid
2.	Mr. Bunyad Hussain
3.	Mr. Sher Ali
4.	Mr. Sawab Gul
5.	Mr. Mohammad Javed
6.	Mr. Sardar Hussain
7.	Mr. Yaqoob Khan
8.	Mr. Mir Daud Khan
9.	Mr. Rehmat Shah
10.	Mr. Nawab Khan
11.	Mr. Muhammad Riaz
12.	Mr. Atiqur Rehman
13.	Mr. Abdul Majeed
14.	Mr. Mohammad Farooq
15.	Mr. Goga Amin
16.	Mr. Fazli Rauf
17.	Mr. Sona Khan

Consequent upon their promotion as Junior Clerks (RFS-5) the following postings/transfers amongst the Junior Clerks are hereby ordered:-

S.No.	Name and Designation	From	To
1.	Mr. Abdur Rashid	Daftari (S&GAD)	Junior Clerk, Proposed Wing of S&GAD
2.	Mr. Bunyad Hussain	Daftari (Finance Deptt.)	Junior Clerk Finance Deptt vice S.No.19
3.	Mr. Sher Ali	Daftari (Local Govt)	Junior Clerk, Local Govt. Deptt. NWFP.
4.	Mr. Sawab Gul	Daftari (S&GAD)	Jr. Clerk, Office of S.O. (Lit), S&GAD
5.	Mr. Mohammad Javed	Daftari (Governor's Sectt.)	Jr. Clerk, Governor's Sectt. NWFP.
6.	Mr. Sardar Hussain	Daftari (FE&D Deptt)	Jr. Clerk, PE&D Deptt. NWFP.
7.	Mr. Yaqoob Khan	Daftari (Forest Deptt)	Jr. Clerk, Social Welfar Deptt. NWFP.
8.	Mr. Mir Daud Khan	Daftari (PE&D Deptt)	Jr. Clerk, C&W Deptt vice S.No.18
9.	Mr. Rehmat Shah	Daftari (PE&D Deptt)	Jr. Clerk, Population Welfar Deptt. NWFP.
10.	Mr. Nawab Khan	Daftari (Irrigation)	Jr. Clerk, S.IV, S&GAD.
11.	Mr. Muhammad Riaz	Daftari (C&W Deptt.)	Jr. Clerk, C&W Deptt. NWFP.

SERVICE RULES FOR THE STAFF OF ADMINISTRATION DEPARTMENT

(Support Wing)

Nomenclature of post	Minimum qualification for appointment by recruitment or by transfer	Minimum qualification for appointment by promotion	Age Limit	Method of recruitment
2	3	4	5	6
1. Technical Officer BS-15	i. Retired Junior Commissioned Officer (JCO) in the relevant field from EME or other Technical Corps. OR ii. Diploma in auto mechanic from recognized institution with six (6) years practical experience in various types of vehicles in reputed workshop/organization. Preferably in Govt. Workshop.		i) 30-46 Yr in respect of retired persons ii) 25-35 Yrs in respect of fresh candidates.	By initial recruitment.
2. Garage Supdt. BS-11 3. JAT Technician BS-7 Motor Mechanic BS-7	Certificate in relevant field from recognized institution with seven years practical experience, preferably in Govt. Workshop		B-33	By selection on merit from amongst the holders of the posts of Drivers. i. 50% by initial recruitment. ii. 50% by promotion from amongst the holders of the posts of Junior Mechanics on seniority-cum-fitness basis on Drivers promoted from the posts of Junior Mechanics/Auto Electricians

[Handwritten Signature]

Section Officer (Admin)
Establishment & P.F. Support Wing

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RECEIVED
S.A. OFFICE
15/01/2022

(28)

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(28)

(21)

1	2	3	4	5	6
	Nomenclature of post	Minimum qualification for appointment by initial recruitment or by transfer	Minimum qualification for appointment by promotion	Age Limit	Method of recruitment
4	Driver BS-4 ✓	Literate having LTV driving license issued by the competent authority. Preference will be given to those who have sufficient experience in driving, repair and maintenance of vehicles.		18-32	i. 50% by initial recruitment. ii. 50% by promotion from amongst the holders of the posts of Junior Mechanics/Auto Electricians/Greasers, possessing valid driving license.
5	Junior Mechanic BS-3	Certificate from recognized institution in relevant field with two years practical experience.		-do-	By initial recruitment.
6	Auto Electrician BS-2	i. Certificate in Auto Electrician from a recognized institution with two years practical experience.		-do-	By initial recruitment.
7	Greaser BS-2	Literate.		-do-	By promotion from amongst the holders of the post of Cleaners on seniority-cum-fitness basis provided that the post shall be filled in by initial recruitment, if no suitable candidate is available for promotion.
8	Cleaner BS-1	-do-		-do-	By initial recruitment.

Sanjay Ahe

Shakti

Section Officer (Admin)
Establishment & Admin. Department



FINANCE DEPARTMENT

No./BOIV/FD/2-4/2017-18/SNE
Dated Peshawar the 26-02-2018

22

To,

The Secretary to Govt. of Khyber Pakhtunkhwa,
Administration Department,

Subject: DEMANDS OF DRIVER'S ASSOCIATION OF CIVIL
SECRETARIAT KHYBER PAKHTUNKHWA.

Dear Sir,

I am directed to refer to your letter No.E&A(AD)04(152)Drivers, dated. 31-01-2018, on the subject noted above and to state that in pursuance of the approval accorded by the Honorable Chief Minister, Khyber Pakhtunkhwa on a summary moved by the Administration Department, Khyber Pakhtunkhwa, the competent authority has been pleased to create posts of drivers as per the following tabulation with immediate effect in public interest, subject to the condition that necessary amendments may be made in the service rules of the above posts of drivers by the Administration Department.

S.No	DDO Code	Department	Designation	No of Posts
1	PR-4012	Chief Minister Secretariat	Garage Superintendent BPS-16	1
			Driver Cum-Supervisor BPS-08	1
2	PR-4041	Finance Department	Garage Superintendent BPS-16	1
			Driver Cum-Supervisor BPS-08	1
3	PR-4017	Administration Department	Garage Superintendent BPS-16	2
			Driver Cum-Supervisor BPS-08	2
4	PR-4058	P & D Department	Garage Superintendent BPS-16	1
			Driver Cum-Supervisor BPS-08	1
Grand Total				10

2- Audit Copies of the above posts may be prepared and send to this department for authentication with fulfillment of conditions as stated in para-1 above please.

Yours faithfully,

(MOAZAM KHAN)
BUDGET OFFICER-IV

Endst: of even No. & Date

Copy forwarded for information and necessary action to:-

- 1) Accountant General, Khyber Pakhtunkhwa, Peshawar.
 - 2) Director, FMIU, Finance Department.
 - 3) Section Officer (Admn) Finance Department
 - 4) Section Officer (Admn) Chief Minister Secretariat
 - 5) Section Officer (General) P & D Department
 - 6) Section Officer (Budget) Administration Department.
 - 7) Budget Officer-XI, Finance Departments alongwith a copy of summary for Chief Minister duly approved for further necessary action.
- Mr. Manzoor Khan and Mr. Shah Jehan Khan, Presidents Driver Association Civil Secretariat Peshawar

BUDGET OFFICER-IV

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (March-2023)

5

23



Personal Information of Mr SAJJAD AHMAD d/o/s of PIR MUHAMMAD

Personnel Number: (00423320) CNIC: 1730163652807 STN:
 Date of Birth: 01/01/1981 Entry into Govt. Service: 16/09/2008 Length of Service: 14 Years 06 Months 017 Days

Employment Category: Active Permanent

Designation: SENIOR DRIVER 80004065-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR5313-DDO for Minerals Development Department KP Peshawar

Payroll Section: 008 GPF Section: 007 Cash Center:
 GPF A/C No: 422320 GPF Interest applied: GPF Balance: 152,668.00 (provisional)

Vendor Number: -
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 07 Pay Stage: 14

Wage type		Amount	Wage type		Amount
0001	Basic Pay	29,050.00	1004	House Rent Allow 45% KPZ	1,968.00
1210	Convey Allowance 2023	1,912.00	1100	Medical Allowance	1,500.00
1567	Washing Allowance	150.00	1580	Overtime Allowance	2,100.00
2128	15% Adhoc Relief All-2017	340.00	2199	Adhoc Relief Allow @ 10%	247.00
2283	Secretariat Perform Allow	14,525.00	2315	Special Allowance 2021	3,500.00
2341	Distt. Rel All 15% 2022KP	2,838.00	2347	Adhoc Rel At 15% 22(PS17)	2,838.00

Deductions - General

Wage type		Amount	Wage type		Amount
2007	GPF Subscription	-1,010.00	3501	Benevolent Fund	-1,200.00
3601	Income Tax	-347.00	4004	R. Benefits & Death Comp	-150.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6501	HBA Loan Principal Instal	250,000.00	2,184.00	231,243.00
6505	GPF Loan Principal Instal	90,000.00	-5,000.00	65,000.00

Deductions - Income Tax

Payable: 3,995.75 Recovered till MAR-2023: 2,955.00 Exempted: 0.07 Recoverable: 1,040.82

Gross Pay (Rs.): 63,888.00 Deductions: (Rs.): -10,891.00 Net Pay: (Rs.): 53,797.00

Payee Name: SAJJAD AHMAD
 Account Number: 3002328908
 Bank Details: NATIONAL BANK OF PAKISTAN, 230598 KHYBER BAZAR PESHAWAR KHYBER BAZAR, PESHAWAR

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: City: PESH Domestic: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address: City: PESH Email: sajjadkmdriver@gmail.com

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (March-2018)

March
2018



Personal Information of Mr KIPTAN AHMAD d/w/s of ALI AHMAD

Personnel Number: 00335118

CNIC: 1730180208273

NTN:

Date of Birth: 01-07-1977

Entry into Govt. Service: 16.05.2006

Length of Service: 11 Years 10 Months 07 Days

Employment Category: Active Temporary

Designation: SENIOR DRIVER

80003819-GOVERNMENT OF KHYBER PAKH

24

DDO Code: PR4014-ESTABLISHMENT & ADMINISTRATION DEPARTMENT.

Payroll Section: 005

GPF Section: 001

Cash Center:

GPF A/C No: 335118

Interest Applied: Yes

GPF Balance:

114,326.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil

BPS: 07

Pay Stage: 13

Wage type	Amount	Wage type	Amount
0001 Basic Pay	18,920.00	1210 Convey Allowance 2005	1,932.00
1300 Medical Allowance	1,500.00	1567 Washing Allowance	150.00
1580 Overtime Allowance	2,000.00	1966 Special Allowance 30%	5,676.00
2148 15% Adhoc Relief All-2013	425.00	2199 Adhoc Relief Allow @10%	301.00
2211 Adhoc Relief All 2016 10%	1,534.00	2224 Adhoc Relief All 2017 10%	1,892.00

Deductions - General

Wage type	Amount	Wage type	Amount
3007 GPF Subscription - Rs1010	-1,010.00	3501 Benevolent Fund	-600.00
3609 Income Tax	-130.00	4004 R. Benefits & Death Comp:	-690.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6503	MCYC Loan Principal Insta	39,900.00	-665.00	18,620.00

Deductions - Income Tax

Payable: 1,362.24 Recovered till March-2018: 973.00 Exempted: 0.19- Recoverable: 389.43

Gross Pay (Rs.): 34,330.00 Deductions: (Rs.): -3,095.00 Net Pay: (Rs.): 31,235.00

Payee Name: KIPTAN AHMAD

Account Number: 08987927363703

Bank Details: HABIB BANK LIMITED, 220898 POLICE ROAD, PESHAWAR. POLICE ROAD, PESHAWAR., PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: HANDKO KALAY MATHRA Domicile: -

Housing Status: No Official

Temp. Address:

City: Email: kiptanahmad1977@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SERVICES/27.03.2018/16:32:06/v1.1)

* All amounts are in Pak Rupees

* Errors & omissions excepted

BUDGET OFFICER-IV

Khyber
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GOVERNMENT OF KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

25

SUBJECT: MINUTES OF THE MEETING OF DEPARTMENTAL SELECTION / PROMOTION COMMITTEE HELD ON 08-05-2018.

A meeting of Departmental Selection / Promotion Committee was held on 08-05-2018 at 02:00 pm under the chairmanship of Deputy Secretary (Admn) Administration Department in his office. The following attended the meeting (list of attendees also annexed):-

(i)	Mr. Saeedullah.	Deputy Secretary (Reg-III) Establishment Dept.
(ii)	Mr. Uqat Ali.	Section Officer (SR-II) Finance Department.
(iii)	Muhammad Yousaf Khan.	Section Officer (Admn) Administration Department.

2- At the very outset of the meeting, some background information of the case was shared with attendees of the meeting.

3- The following agenda items were placed before the committee for recommendations:

ITEM NO.1: RECRUITMENT AS CLASS IV UNDER RULE-10(2) OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989.

4- The forum was informed that the following three (03) candidates have applied for recruitment under Rule 10(04) of the Khyber Pakhtunkhwa Civil Servants (Appointment, promotion & Transfer Rules) 1989 :-

S.No	Name	Designation	Date	Remarks	Remarks
1	Mr. Bilal Khan	Mr. Zamin Khan ex-Nalb Qasid	22-08-1995	Nalb Qasid	Mr. Zamin Khan Invalidated as Nalb Qasid from this department w.e.f 22-08-1995
2	Muhammad Waqar	Muhammad Saleem ex-Cook	12-03-2004	Nalb Qasid	Muhammad Saleem Invalidated as Cook from this department w.e.f 12-03-2004
3	Mr. Ijaz Wali	Sher Ali Khan ex-Nalb Qasid	20-12-2017	Nalb Qasid	Sher Ali Khan Invalidated as Nalb Qasid from this department w.e.f 20-12-2017

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AHC

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5- In this regard, the meeting recommended the following:-

(i)	Mr. Bilal Khan s/o Mr. Zamin Khan, ex-Nalib Qasid (Invalidated)	Recommended for appointment as Nalib Qasid (BPS-03) in E&A Department.
(ii)	Muhammad Wasim s/o Muhammad Saleem, ex-Cook (Invalidated).	Recommended for appointment as Farash (BPS-03) in E&A Department.
(iii)	Mr. Ijaz Wali s/o Sher Ali Khan ex-Nalib Qasid (Invalidated)	Recommended for appointment as Nalib Qasid (BPS-03) in E&A Department.

ITEM NO.2: PROMOTION OF MALI TO THE POST OF HEAD MALI (BPS-04) IN E&A DEPARTMENT.

6- The forum was informed that there are two (2) sanctioned posts of Head Mali (BPS-04) at the strength of E&A Department. One post of Head Mali (BPS-04) is vacant which, as per service rules, is required to be filled by promotion on the basis of seniority-cum-fitness from amongst the Malis having at least twenty years service at his credit.

7- The forum recommended Mr. Nazir Muhammad, Mali, being senior most having more than 20 years service, for promotion to a vacant post of Head Mali (BPS-04) at the strength of E&A Department.

ITEM NO.3: PROMOTION OF MATRICULATE CLASS IV TO THE POST OF DAFTARI (BPS-04) IN CIVIL SECRETARIAT.

8- The forum was informed that there are 269 sanctioned posts of Daftari (BPS-04) at the strength of Civil Secretariat. 20 posts of Daftari (BPS-04) are filled whereas 248 other are vacant which are required to be filled-in by promotion on the basis of seniority-cum-fitness from amongst matriculate Class IV.

9- It was brought into notice of the forum that employees at SN# 7, 8, 11, 12, 13, 16 & 92 of notified seniority list belongs to the category of household staff. Mr. Taj Muhammad, Section Officer (B&D) Administration Department, was especially called to explain to the forum status of those employees. Referring to their appointment orders, Mr. Taj Muhammad contended that the employees in question are civil servants belonging to the general cadres of Civil Secretariat. He said that being civil servants they should be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and all the laws applicable to the Civil Servants and the Rules made there-under. He added that they (the employees in question) have every right to be included in the joint seniority list of matriculate Class IV so as to avail the benefit of promotion in Civil Secretariat. After threadbare discussion, the forum unanimously acknowledged the right of seniority / promotion in the Civil Secretariat of the employees at SN# 7, 8, 11, 12, 13, 16 & 92 of seniority list.

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BETTER COPY

MILITARY SECRETARY TO GOVERNOR
NWFP PROVINCE

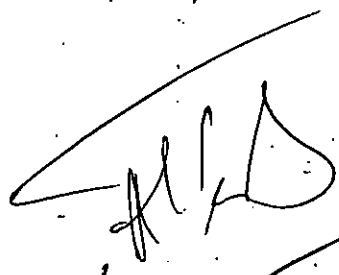
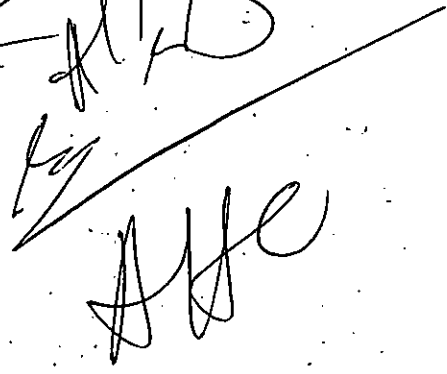
ORDER:

Syed Wajid Hussain Shah son of Syed Muhammad Shah is hereby appointed as a Driver in Governor's House Peshawar against a vacant post purely on temporary basis in the Basic Pay Scale No. (02) Rs 500-18-820 plus usual allowances as admissible under the rules with effect from 14/09/1985 (F.N).

Military Secretary
(Mir Alam Khan)

No. MSG/1019/PF

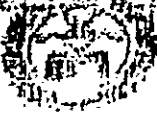
Dated: Peshawar the 14th September 1985

28

GOVERNOR'S HOUSE
PESHAWAR

No. SO/MSG/11-20/155/02
02 Oct. 2007



To

The Secretary to Govt of NWFP,
Administration Department,
Peshawar.

Subject: Posting/Transfer

Dear Sir,

I am directed to refer to the subject noted above and to say that Syed Waqar Hussain Shah, Driver, has been transferred to Transport Wing of Administration Department today for his further posting.

I am therefore to request that Posting/Transfer Order No. No. SO/AD/11-20/2006 dated 15/11/2007 may please be withdrawn giving effect to the order No. SO/AD/11-20/2006 dated 18/11/2007 whereunder Mr. Azmat Ali Driver will continue to perform his duties in the Governor's House, Peshawar as a substitute of Syed Waqar Hussain Shah Driver.

Yours faithfully,

(Signature)
Syed Waqar Hussain Shah
Driver

28A

BETTER COPY

GOVERNOR'S HOUSE
PESHAWAR

No. SO(MSG).....
02th Oct 2007

To

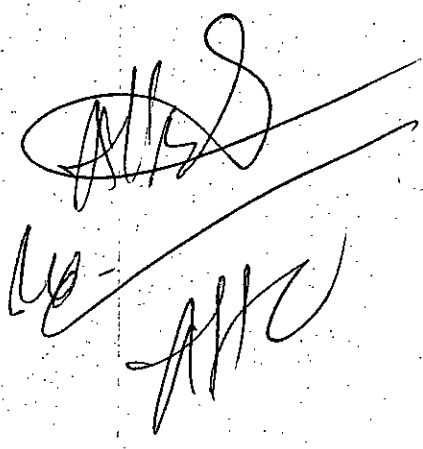
The Secretary to Govt of NWFP,
Administration Department,
Peshawar

Subject: Posting/Transfer

Dear Sir,

I am directed to refer to the subject noted above and to say that Syed Wajid Hussain Shah, Driver, has been directed to report to Transport Wing of Administration Department today for further posting.

I am therefore, to request that posting/transfer Order No. SOT(AD)..... Dated: 18/08/2007 may please be withdrawn giving effect to the letter..... Dated: 18/07/2007 where-under Mr. Azmat Ali Driver will continue to perform his duties in the Governor's House Peshawar as substitute of Syed Wajid Hussain Shah, Driver.




Yours faithfully

(Abdul Malik)
Section Officer to MSG

قیمت روپے 50	70994			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ ایسوسی ایشن نمبر: BC-13-4				
رابطہ نمبر: 03339577770				

KP Service Tribunal

بعد اٹ جناب:

منجانب:	دعویٰ:
Kamal ud Din	علت نمبر:
بنام	Service
	مورخہ:
	جرم:
	تھانہ:
باعث تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وہ اپیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل باجروزی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا سبب پر داخست منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

PESHAWAR BAR ASSOCIATION
 HYBER PAKHTOONKHWA

M. M. Imran
 Atc

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