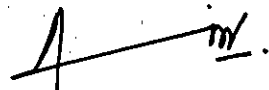


FORM OF ORDER SHEET

Court of _____

Appeal No. 1105/2023


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. Ikram Khan 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> For REGISTRAR</p>

The appeal of Mr. Ikram Khan Driver Governor House Peshawar received today i.e. on 25.04.2023 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. 1344 /S.T,

Dt. 5/5 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mian Muhammad Imran Adv.
High Court Peshawar.

Respected SW,
The deficiencies have been
rectified & resubmitted for,
15/5/23
M M Imran
AJC

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

Service Appeal No. 1105 /2023

Ikram Khan (Driver) (BPS-6), Governor's House Peshawar

....Appellant

VS

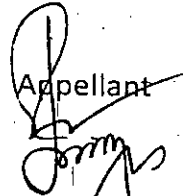
**Government of Khyber Pakhtunkhwa through Chief Secretary, Civil
Secretariat Peshawar Et. Al.**

....Respondents

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S.No	DOCUMENTS	FLAG	PAGE
01.	Service Appeal		1-5
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03.	Copy of Departmental Appeal	B	8-10
04.	Copy of Appointment Orders etc of other employees of Governor's House Peshawar	C	11-19
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05.	Copy of DPC Meeting	F	25-26
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Through

Appellant


(Mian Muhammad Imran)
Advocate High Court
BC-13-4713
0333-9577770 0333-9274073

BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1105 /2023

Ikram Khan (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*;

GROUND:

- 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 of the Employees of Governor's House 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. (Copy of Pay Slips of Secretariat Drivers is attached as F/D)
- 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 Rules for Appointment of Drivers of Civil Secretariat & Creation of Garage Superintendent 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

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)

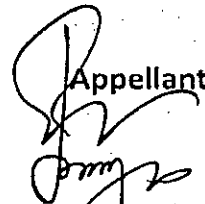
- G. That even a number of Governor's House drivers have been transferred at different intervals to the Civil Secretariat which is endorsement of the fact that there is no difference among the Governor's House drivers and Civil Secretariat drivers. If they can be transferred to the Secretariat, why not 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.

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 of 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.

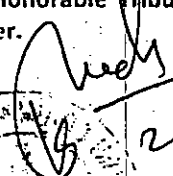
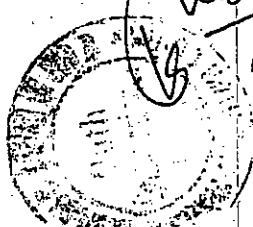
Through

Appellant


(Mian Muhammad Imran)
Advocate High Court
BC-13-4213
0333-9577720 0333-9274073

Affidavit:

I, *Ikram Khan* (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.


26-11-23


Deponent



GOVERNOR'S HOUSE
PESHAWAR

6th June, 2017

OFFICE ORDER

No. SO/MSGV/GH/2017 The Competent Authority is pleased to appoint Mr. Ikram Khan S/O Barkat Shah, R/O Kandl Taza Din, P.O Pabbi, Tehsil & District Nowshera as Driver (BPS-06) against the vacant post of household in Governor's House, Peshawar on permanent basis with immediate effect on the following terms and conditions:-

- i. His appointment is purely temporary and his services are liable to be terminated without assigning any reason.
- ii. In case he wishes to resign from service, 15 days advance notice will be necessary or in lieu thereof 15 days pay shall be forfeited.
- iii. He will be entitled for Conveyance, Medical, House Rent Allowances, TADA and leave as per Government rules.
- iv. His appointment is subject to the production of Medical Fitness Certificate from the Civil Surgeon, Peshawar.

MILITARY SECRETARY TO GOVERNOR

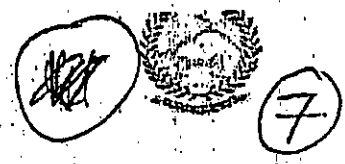
ENDST: NO. SO/MSGV/GH/2017/383-68 Dated 6th June, 2017

Copy forwarded for information and necessary action to:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. ADC to Governor, Governor's House, Peshawar.
3. PS to MSG, Governor's House, Peshawar.
4. Comptroller, Governor's House, Peshawar.
5. DSP (Security), Governor's House, Peshawar.
5. Section Officer (B&A), Governor's House, Peshawar.
7. Mr. Ikram Khan S/O Barkat Shah, R/O Kandl Taza Din, P.O Pabbi, Tehsil & District Nowshera.

Section Officer to MSG
Governor's House, Peshawar

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar,
(Monthly Salary Statement (January-2021))



→ **Personal Information of Mr IKRAM KHAN d/w/s of BARKAT SHAH**
 Personnel Number: 00847859 CNIC: 1720149442319 NTN:
 Date of Birth: 01.10.1991 Entry into Govt. Service: 06.06.2017 Length of Service: 03 Years 07 Months 027 Days

Employment Category: Active Permanent
 Designation: DRIVER 80003814-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR4009-SECTION OFFICER (B&A)GOVERNOR'S HOUSE PESHAWAR
 Payroll Section: 005 GPF Section: 001 Cash Center:
 GPF A/C No: Interest Applied: Yes GPF Balance: 48,679.00
 Vendor Number: 30324312 IKRAM KHAN 0476002 BOK 080159
 Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 06 Pay Stage: 3

Wage type	Amount	Wage type	Amount
0001 Basic Pay	12,300.00	1001 House Rent Allowance 45%	2,316.00
1210 Convey Allowance 2005	1,932.00	1300 Medical Allowance	1,500.00
1580 Overtime Allowance	2,000.00	2211 Adhoc Relief All 2016 10%	890.00
2224 Adhoc Relief All 2017 10%	1,230.00	2247 Adhoc Relief All 2018 10%	1,230.00
2264 Adhoc Relief All 2019 10%	1,230.00	2283 Secretariat Perform Allow	6,150.00

Deductions - General

Wage type	Amount	Wage type	Amount
3006 GPF Subscription	-950.00	3501 Benevolent Fund	-600.00
3534 R. Ben & Death Comp Fresh	-450.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax
 Payable: 0.00 Recovered till JAN-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 30,778.00 Deductions: (Rs.): -2,000.00 Net Pay: (Rs.): 28,778.00

Payee Name: IKRAM KHAN
 Account Number: 0476002
 Bank Details: THE BANK OF KHYBER, 080159 IBB Pabbi Branch IBB Pabbi Branch,

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: City: NOWSHERA Domicile: - Housing Status: No Official
 Temp. Address: City: Email: ikram4935867@gmail.com

Handwritten signature and initials: JAK

*System generated document in accordance with APPM 4.6.12.9(SERVICES/01.02.2021/04.03:00/v2.0)
 * All amounts are in Pak Rupees
 * Errors & omissions excepted*

(8)

4314
27/12

[Handwritten signature]
27/12

To

The Worthy Chief Secretary,
Khyber Pakhtunkhwa

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

o/c

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

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 nor 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

10

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:

27/12/022



(Ikram Khan)

Driver

Governor's House Peshawar

CNIC No. 17201-4944231-9

Cell No.

0333 8315562



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 Abeer 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 EPS-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

Nazim
Lt. Col
(Nazim Anwar Butt)
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.



GOVERNMENT OF NWFP
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

12

Dated Peshawar, the 13th March, 2009

ORDER

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

On the recommendations of the Departmental Promotion Committee, the following Duftaries/Naib 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 Taseem <i>Tahseem</i>
6.	Mr. Muhammad Younas
7.	Mr. Faisal Sarwar
8.	Mr. Zahir Shah
9.	Mr. Aftab Ahmad
10.	Mr. Muhammad Shahir <i>Sahir</i>
11.	Mr. Bakhtiar Khan
12.	Mr. Inayatullah Rehman
13.	Mr. Zar Taj Wali
14.	Mr. Imran Ahmad

M. Sahir promoted as Naib Qasid on 13/3/2009 on acting charge of Secy Estab.

Promoted as Naib Qasid

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 Taseem	Admin. 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)

13

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. Inayatpur Rehman	Higher Education Deptt
8	Mr. Zartaj Wali	Chief Minister's Sectt
9	Mr. Imran Ahmad Muhammad Afzal	S/O PDMA
10	Mr. Said Karam	Industries Deptt

Promoted
on regular basis

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. Inayatpur 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

1048

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 Beshti, 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
"Beshti" on
26/1/1995 by
MSG

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



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



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	1
SO (B&A)	1
Diary No	123

Shah Jehan
(SHAH JEHAN)



ORDER

16

~~(Signature)~~

N/A

Mr. Hameed Ahmad 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.

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/- ~~(Signature)~~
Military Secretary to Governor NWFP

Dated 16 Sept. 97

No. MSG/BPS/97/1020-24

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.

~~(Signature)~~

Handwritten notes at the bottom of the page, including "Currently" and "Supervised in Peshawar".

17

~~17~~

31/1/09

31/1/2009

ORDER

No.F&A(AD)4077/2002. 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) Sectt:
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

- interve

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.

Sr. No	Name of officials	From	To
1.	Mr. Shahidur Rehman	C.M. Sectt, NWFP	Retained in C.M. Sectt, 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	Retained 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

in 2nd

18

(18)

GOVERNMENT OF NWFP
ADMINISTRATION DEPARTMENT

Dated Peshawar the 19.02.2008.

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 Daffar	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

~~18~~

Director of S&CAD

Order

No. S&CAD/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 (SFS-5) with immediate effect:-

S.No.	Name of Clerks-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. Noza Amin
16.	Mr. Fazli Rauf
17.	Mr. Sonn Khan

Consequent upon their promotion as Junior Clerks (SFS-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&CAD)	Junior Clerk, Protocol Wing of S&CAD
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&CAD)	Jr. Clerk, Office of S.O. (Lit), S&CAD
5.	Mr. Mohammad Javed	Daftari (Governor's Sectt.)	Jr. Clerk, Governor's Sectt. NWFP.
6.	Mr. Sardar Hussain	Daftari (PE&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&CAD.
11.	Mr. Muhammad Riaz	Daftari (C&W Deptt.)	Jr. Clerk, C&W Deptt. NWFP.

SERVICE RULES FOR THE STAFF OF ADMINISTRATION DEPARTMENT

Support Wing)

1 Nomenclature of post	2 Minimum qualification for appointment by recruitment or by transfer	3 Minimum qualification for appointment by promotion	4 Age Limit	5 Method of recruitment	6
Technical Officer BS-15	i. Retired Commissioned Officer (JCO) in the relevant field from EME or other Technical Corps. OR ii. Diploma in auto mechanic in auto recognized institution with six (6) years practical experience in various types of vehicles in reputed workshop/ organization. Preferably in Govt Workshop.		i) 30-40 Yr in respect of retired persons ii) 25-35 Yrs in respect of fresh candidates.	By initial recruitment.	
Garage Supdt. BS-11 MT Technician (S-7) Motor Mechanic (S-7)	Certificate in relevant field from recognized institution with seven years practical experience. Preferably in Govt workshop.		30-32	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 iii. seniority-sum-fitness basis in Drivers promoted from the posts in Junior Mechanics/Auto Electricians.	

20

July 1956

Section Officer (Admin)
Establishment & Department

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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	1. 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

Shabbar

Section Officer (Admin)
Establishment & Adm. 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)

E

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 B0004065-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR5313-DDO for Minerals Development Department KP Peshawar
 Payroll Section: 003 GPF Section: 007 Cash Center:
 GPF AC 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
1000 Basic Pay	29,050.00	1004 House Rent Allow 45% KPZC	4,268.00
1210 Convey Allowance 2003	1,932.00	1300 Medical Allowance	1,500.00
1567 Wedding Allowance	150.00	1580 Overtime Allowance	2,000.00
2148 15% Adhoc Relief All-2013	540.00	2190 Adhoc Relief Allow @ 10%	247.00
2243 Secretariat Perform Allow	14,525.00	2315 Special Allowance 2021	3,500.00
2341 Dispr. Reli AB 15% 2022 KP	2,838.00	2347 Adhoc Rel A) 15% 23(PS17)	2,838.00

Deductions - General

Wage type	Amount	Wage type	Amount
3007 GPF Subscription	-1,010.00	3501 Benevolent Fund	-1,200.00
3601 Income Tax	-347.00	4004 R. Benefits & Death Comp	-461.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6501	HBA Loan Principal Instal	250,000.00	2,084.00	231,244.00
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.): -10,091.00 Net Pay: (Rs.): 53,797.00

Payee Name: SAJJAD AHMAD

Account Number: 3042328508

Bank Details: NATIONAL BANK OF PAKISTAN, 290598 KHYBER BAZAR PESHAWAR KHYBER BAZAR, PESHAWAR

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: PESH Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address:
 City: PESH Email: sajjadahmaddriver@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
 Date of Birth: 01-07-1977 Entry into Govt. Service: 16.05.2006

NTN:
 Length of Service: 11 Years 10 Months 017 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 4.6.129 (SERVICES/77.03.2018/16:32:06/v1.1)
 * All amounts are in Pak Rupees
 * Errors & omissions excepted

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BUDGET OFFICER-IV



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. Usqat 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:-

1	Mr. Bilal Khan	Mr. Zamin Khan ex-Naib Qasid	22-08-1995	Naib Qasid	Mr. Zamin Khan Invalidated as Naib Qasid from this department w.e.f 22-08-1995
2	Muhammad A. Waseem	Muhammad Saleem ex-Cook	12-03-2004	Naib Qasid	Muhammad Saleem Invalidated as Cook from this department w.e.f 12-03-2004
3	Mr. Ijaz Wali	Sher Ali Khan ex-Naib Qasid	20-12-2017	Naib Qasid	Sher Ali Khan Invalidated as Naib Qasid from this department w.e.f 20-12-2017

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

(i)	Mr. Bilal Khan s/o Mr. Zamin Khan , ex-Naib Qasid (Invalidated)	Recommended for appointment as <u>Naib Qasid (BPS-03)</u> in E&A Department.
(ii)	Muhammad Wasim s/o Muhammad Saleem , ex-Cook (Invalidated)	Recommended for appointment as <u>Farash</u> <u>(BPS-03)</u> in E&A Department.
(iii)	Mr. Ijaz Wali s/o Sher Ali Khan ex-Naib Qasid (Invalidated)	Recommended for appointment as <u>Naib Qasid (BPS-03)</u> 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 S#7,8,11,12,13,18 & 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 S#7, 8, 11,12,13,18 & 92 of seniority list.

[Handwritten signatures and initials]

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26

27

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



... Military Secretary to Governor ...
... in the basis for ...
... Allowance ...

- ... 1944 ...
1. The Accountant General, ...
 2. The ...
 3. The Accountant, Governor's House ...
 4. ...
 5. ...
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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

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28A

BETTER COPY

GOVERNOR'S HOUSE
PESHAWAR

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

To

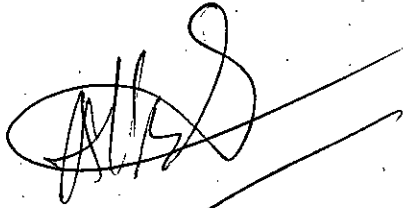

The Secretary to Govt of NWFP,
Administration Department,
Peshawar

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
50 روپے

70995



ایڈوکیٹ:
بار کونسل ایسوسی ایشن نمبر: BC-13-4213
رابطہ نمبر: 03339577999

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب:

مخائب: Appellant	دعوی:
90 Kham Kham بنام 90 Kham Kham of KP	علت نمبر: مورخہ: جرم: تھانہ:
باعت تحریر آگے	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام لکھنؤ کیلئے مسائل محمد علی (ایڈووکیٹ) کو پیش مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف 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 یا جزوی
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 اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم 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

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