



22<sup>nd</sup> Nov, 2022

Clerk to counsel for the appellant present. Mr. Muhammad Adeel Butt: AG for respondents present.

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned to 20.01.2023 for arguments before D.B.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member(Executive)

  
(Kalim Arshad Khan)  
Chairman


20.01.2023


Counsel for the appellant present.

Muhammad Jan learned District Attorney for the respondents present.

SCANNED  
KPST  
Peshawar

Former made a request for adjournment in order further prepared the brief. Adjourned. To come up for arguments on 20.03.2023 before D.B.

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)


20.03.2023

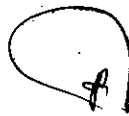
Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for the respondents present.

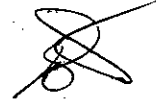
Former requested for adjournment as he has not prepared the brief. Adjourned. To come up for arguments on 06.06.2023 before D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

  
(Muhammad Akbar Khan)  
Member (E)

  
(Rozina Rehman)  
Member (J)

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



Reader

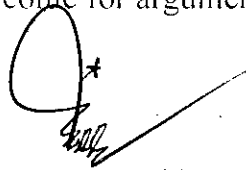
2-3-22

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



16.06.2022 Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is indisposed. Adjourned. To come for arguments on 09.08.2022 before the D.B.



(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

9-8-2022


Due to the Public holiday the case is adjourned to 22-11-2022



Reader

20.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 12.08.2021 for the same as before.

  
Reader

12.08.2021

Appellant present through counsel.

Asif Masood Ali Shah learned D.D.A for respondents present.

Former submitted that similar nature cases are fixed in 21.09.2021 before D.B-II, therefore, the instant case may also be fixed on the said date. Request is accorded. To come up alongwith similar nature appeals on 21.09.2021 before D.B-II.



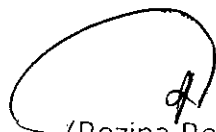
(Rozina Rehman)  
Member (J)

  
Chairman

21.09.2021

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

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



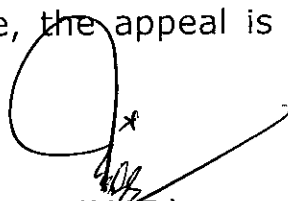
(Rozina Rehman)  
Member(Judicial)

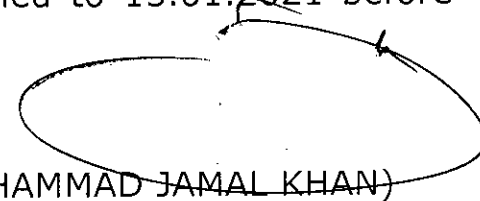
  
Chairman

05.01.2021

Mr. Irfan Ali Yousafzai, Advocate, for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Fazal Mahboob, Inspector (Legal) for the respondents are also present.

Learned counsel for appellant submitted that on the issue involved in the instant appeal there are similar appeals bearing No. 1525/2019 to 1528/2019 Captioned Sher Zamin ASI Versus Government of Khyber Pakhtunkhwa, pending adjudication in this Tribunal in which next date of hearing is fixed on 13.01.2021, therefore, he requested that it may be fixed alongwith referred to appeals so that matter is decided simultaneously. The request is appropriate, the appeal is adjourned to 13.01.2021 before D.B-I.

  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

13.01.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Due to COVID-19, the case is adjourned for the same on 20.04.2021 before D.B.

  
READER

16.09.2020

Counsel for the appellant present.

The grievance of appellant is that despite qualifying as per Paragraph 2 of the Incentives Part contained in Standing Order No. 11, he has not been included in promotion list "E" by the respondents. The delay in doing the needful has contributed towards jeopardizing the valuable service rights of the appellant.

Subject to all just exceptions instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments on 29.10.2020 before S.B.

Appellant Deposited  
Security & Process Fee

Chairman

30.10.2020

Appellant present through representative.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Fazal Mabood Inspector for respondents present.

Representative of respondents submitted written reply/comments. To come up for rejoinder, if any, and arguments on 05.01.2021 before D.B.

SCANNED  
KPST  
Peshawar



(Rozina Rehman)  
Member (J)

Form- A

# FORM OF ORDER SHEET

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

Case No.- 8819 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/07/2020	<p>The appeal of Mr. Riaz Ali presented today by Mr. Irfan Ali Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/09/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

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

Service Appeal No. 8819/2020

Riaz Ali.....**Appellant**

**VERSUS**

Provincial Police Office and other..... **Respondents**

**I N D E X**

<b>S.No</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Memo of Appeal	*	1-8
2.	Affidavit	*	9
3.	Copy of posting order	A	10
4.	Copies of Standing Orders and letter	B	11-18
5.	Copy of Notifications	C	19-23
6.	Copy of the application	D	24
7.	Copy of the order	E	25-27
8.	Wakalat Nama		* 28

Through

Date: 28/07/2020

Appellant

*Irfan Ali Yousafzai*

**Irfan Ali Yousafzai**

Advocate, High Court,

Peshawar

Cell# 0314-9070658

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

Service Appeal No. \_\_\_\_\_/2020

**ASI**

Riaz Ali

Law Instructor Police Training College Hangu

.....Appellant

**V E R S U S**

**1. Provincial Police Office**

Govt of Khyber Pahtunkhwa Peshawar.

**2. The Commandant**

Police Training College Hangu. ....Respondents

**APPEAL UNDER SECTION 4 OF  
THE SERVICES TRIBUNAL ACT  
1974 FOR CONFIRMATION OF  
THE APPELLANT IN RANK OF  
ASI AND BROUGHT HIS NAME  
ON THE PROMOTION LIST "E"**

**Prayer in Appeal:**

On acceptance of this appeal, this Hon'ble Tribunal may graciously be please to declare the acts and action of the respondents as unlawful and illegal by not confirming the appellant in rank of ASI and not brought his



2

name in the promotion list "E", and to direct the respondents to confirm the appellant as ASI as well as brought his name in "E" List of promotion as the other candidates were also confirmed as ASIs and also enlisted in the "E" List of promotion, as per their eligibilities and entitlement under the standing order No. 11/87, letter No. 20610-60/E-1 dated 01.10.1995, standing order No. 07/2003 and Act-IV of 2005 Khyber Pahtunkhwa (Validation of standing order Act, 2005). Therefore the appellant also deserve to be treated similarly and is entitled to be promoted to the rank of ASI and enlisted in "E" list. The respondents are going to confirmed and enlisted in the list "E" the other candidates except the appellant which is illegal, unlawful, without lawful authority and ineffective upon the rights of the present appellant.

**Respectfully Sheweth:**

1. That the appellant is ASI of the respondents department presently serving as a Law Instructor in the Police Training College/Center at Hangu. (Copy of posting order is attached as Annexure A)

2. That the respondent No 1 vide standing order No. 11\87, standing No. 7\2003 and the Government of Hyderabad Patrunkhw vide Act-VI of 2005 (Validation of standing order Act, 2005) and Office\Police letter No. 20710-60\E-1, dated 01\10\1995 has declare certain incentives for those Police Officer, who has secured higher marks in Intermediate Training Course and Voluntarily opted to joint Police Training College as Law Instructors. (Copies of Standing Orders and letter dated 01\10\1995 are attached as Annexure B)

3. That due to deficiency of the skilled and experience Instructional Staff, the service of appellant was required to the Police Training College Hangu and thus the respondent No.2 approached to the respondent No.1 for the immediate transfer of the appellant to PTC Hangu in the larger interest of the Police Force. Appellant was promised that he will be entitled for the benefits of Policy Letter No. 20710-60\E-1 dated 01\10\1995 in case they voluntarily opted to join PTC, Hangu as Law Instructor.

4. That in pursuance of the spirits of the standing orders and their legitimate expectancy of rapid

promotion prospects, appellant opted to join PTC, Hangu as a Law Instructor.

5. That the appellant was transferred and posted as Law Instructor and since then is performing his duty as such till the date.
6. That according to the standing orders the appellant qualify amongst the first five positions in his class notification n dated 7.11.2016 which was issued by the respondent No.2. **(Copy of Notification is attached as Annexure-C)**
7. That as per provision of the letter dated 01.10.1995 and Standing Order No. 11/87, Standing order No 07 of 2003 and the Govt. of Khyber Pahtunkhwa Vide Act VI of 2005 (Validation of Standing Order Act, 2005) appellant has completed the prescribed length of service as Law Instructor and was entitled to be conformed in the rank of ASI and his name would be brought on promotion list "E" but has been deprived from his accrued right with reason best known to the respondents, appellant being eligible and entitled to secure the benefit of the Act/Notifications and after completion of the Said period and the appellant submitted Application for his conformation to the concerned

authorities. **(Copy of application is attached as Annexure-D)**

8. That it is pertinent to mention here that the respondents has approved and conformed other having similar and identical cases with that of the appellant, but the respondents are reluctant to extent legal favour in respect of the appellant, which is a clear and visible discriminations. **(Copy of the order is attached as Annexure-E)**

9. That appellant, being aggrieved of the acts and actions of respondents and having no other adequate and efficacious remedy, filed this service appeal inter alia on the following grounds.

### **GROUND S:**

A. That respondents have been not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitutional of Islamic Republic of Pakistan, 1973. As per provision of the Standing Order No. 11 of 1987 Notification/Letter No. 200710-60/E-1 dated 01.10.1995 and subsequent Standing Order No. 07 of 2003 and Act IV of 2005 Khyber Pakhtunkhwa Validation

of Standing Order Act, 2005 appellant has completed the prescribed length of service as Law Instructor and now eligible and entitled to secure the benefits of the Act/Notifications, but have been ignored the appellant from confirmed and enlisted in "E" list of promotion.

- B. That all public powers are in nature of a trust and public functionary must act as repositories of such trust. The respondents were under legal obligation to allow the appellant to confirm in the rank of ASI and also enlisted in "E" list.
- C. That appellant has been discriminated as colleagues and even junior to the appellant, whose cases and similar and identical to that of appellant was confirmed on the rank of ASI and also enlisted in "E" list.
- D. That any other grounds will be raised at the time of arguments with prior permission of this Hon'ble Tribunal.

**It is, therefore, most humbly prayed that on acceptance of this appeal, this Hon'ble Tribunal may graciously be please to declare the acts and action of the respondents as**

unlawful and illegal by not confirming the appellant in rank of ASI and not brought his name in the promotion list "E", and to direct the respondents to confirm the appellant as ASI as well as brought his name in "E" List of promotion as the other candidates were also confirmed as ASIs and also enlisted in the "E" List of promotion, as per their eligibilities and entitlement under the standing order No. 11/87, letter No. 20610-60/E-1 dated 01.10.1995, standing order No. 07/2003 and Act-IV of 2005 Khyber Pahtunkhwa (Validation of standing order Act, 2005). Therefore the appellant also deserve to be treated similarly and is entitled to be promoted to the rank of ASI and enlisted in "E" list. The respondents are going to confirmed and enlisted in the list "E" the other candidates except the appellant which is illegal, unlawful, without lawful authority and ineffective upon the rights of the present appellant.

Through

Appellant



Irfan Ali Yousafzai

Advocate, High Court,  
Peshawar

Date: 28/07/2020

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

Service Appeal No. \_\_\_\_\_/2020

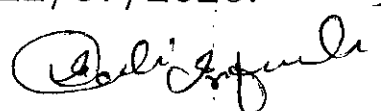
Riaz Ali.....**Appellant**

**VERSUS**

Provincial Police Office and other..... **Respondents**

**NOTE:**

No such like appeal has earlier been filed before this Hon'ble Tribunal, the appellant approached the Peshawar High Court, Peshawar through Writ Petition No. 3219-P/2020 in which the Hon'ble Peshawar High Court, Peshawar directed to appellant to approach this Hon'ble Tribunal vide order dated 22/07/2020.

  
**ADVOCATE**

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

Service Appeal No. \_\_\_\_\_/2020

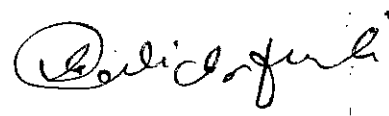
Riaz Ali.....**Appellant**

**VERSUS**

Provincial Police Office and other..... **Respondents**

**AFFIDAVIT**

I, **Irfan Ali Yousafzai Advocate (Counsel for appellant)**, do hereby solemnly affirm and declare on oath that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.



**DEPONENT**



9-A

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

Service Appeal No. \_\_\_\_\_/2020

Riaz Ali.....**Appellant**

**VERSUS**

Provincial Police Office and other..... **Respondents**

**ADDRESSES OF PARTIES**

**APPELLANT**

**ASI**

Riaz Ali

Law Instructor Police Training College Hangu

**RESPONDENTS**

**1. Provincial Police Office**

Govt of Khyber Pahtunkhwa Peshawar.

**2. The Commandant**

Police Training College Hangu.

Through

Appellant



**Irfan Ali Yousafzai**

Advocate, High Court,  
Peshawar

Date: 28/07/2020



"A"

90

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

ORDER

Head Constable Riaz Ali No. 480 of Buner District Police is hereby transferred and posted to PTC/Hangu Under Standing order No. 07/2016 with immediate effect.

*Wajid*

(NAJEEB-UR-REHMAN BUGVI)PSP

AIG/Establishment

For Inspector General of Police  
Khyber Pakhtunkhwa, Peshawar.

No. 11388-11401 E-IV dated Peshawar the 17 / 11 / 2016

Copy of above is forwarded for information to the:

1. Deputy Inspector General of Police Malakand Region, Swat
2. Commandant PTC/Hangu w/r to his office letter No. 1316/FC dated 04.11.2016.
3. District Police Officer Buner w/r to his Memo NO. 6916/EC dated 15.11.2016.

ATTESTED

*Wajid*  
to be true copy  
Advocate

ATTESTED

*Wajid*  
to be true copy  
Advocate

B

(11)

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

**BACK GROUND**

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

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

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

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

**INCENTIVES.**

**1. HC INSTRUCTORS.**

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

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

**2. ASI INSTRUCTORS**

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

**SI INSTRUCTORS.**

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to be true copy  
Advocate

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to be true copy  
Advocate

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

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

3.A.

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

NOTE.

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

-Sd-

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

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

Copies to :-

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

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to be true copy  
Advocate

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to be true copy  
Advocate

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

**INTRODUCTION**

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

**AIM**

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

**APPLICABILITY**

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

**OBJECTIVES**

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

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

The perception of in service training of newly promoted officers of their training needs in the light of their previous training and their operational experience. The perception of persons and organizations, out side the police service regarding the role and training of police supervisors.

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

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

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

**INCENTIVES.**

**3. TIC INSTRUCTORS.**

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

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Advocate

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Advocate

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

4. ASI INSTRUCTORS

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

SI INSTRUCTORS.

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

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

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

NOTE:

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

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

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

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

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to be true copy  
Advocate

**ATTESTED**  
to be true copy  
Advocate

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

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to be true copy  
Advocate

**ATTESTED**  
*[Signature]*  
to be true copy  
Advocate

(16)

ACT IV OF 2005

NORTH-WEST FRONTIER PROVINCE

VALIDATION OF STANDING ORDER ACT, 2005

*An Act to validate the rights created by Standing  
Order No. 11 of 1987, issued by the Inspector General  
of Police, North-West Frontier Province  
(Gazette of NWFP extraordinary, 2<sup>nd</sup> February, 2005)*

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

Preamble:

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

It is hereby enacted as follows:

1. **Short title and commencement:** (1) This Act may be called the North-West Frontier Province Validation of Standing Order Act, 2005.
2. It shall come into force at once and shall be deemed to have taken effect on the 17<sup>th</sup> day of July, 1987.
3. Validation of Standing Order No. 11 of 1987. (1) Notwithstanding anything contained in the existing service rules governing the promotion and seniority of Constables, Head Constables, Assistant Sub Inspector, and Sub Inspector of the Police Department, or any decree order of judgment of a Court, or for reason of any procedural deficiency.....

a. The rights of promotion and seniority accruing under Standing Order No. 11 of 1987 (hereinafter referred to as the said order ), issued by the Inspector General of Police, North West Frontier Province, in the larger public interest, with the sole intention and object to improve the efficiency and sense of responsibility amongst the aforesaid police personnel, shall be deemed, and shall always be deemed, to have validity been accrued; and

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to be true copy  
Advocate.

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to be true copy  
Advocate



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

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

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

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From : The Inspector General of Police,  
NWFP, Peshawar

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

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

Memorandum

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

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

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

I. INTERMEDIATE SCHOOL COURSE

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

II. LOWER SCHOOL COURSE

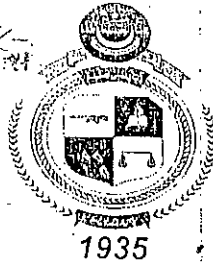
- (A) Procedure "Marking system" given in standing order No. XI/1987 to apply in selection against the standing order.
- (B) Service at PTC/RTW to be given due weight-age and one year service at PTC/RTW to carry 02 marks, but broken period(s) not form part in counting.
- (C) Common seniority/merit list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

(SAKANDAR MOHAMMAD ZAI)

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

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Advocate



OB NO. 808

dt 8/11/16

Ph # 0925-621886  
Fax # 0925-623236

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**Office the Commandant, Police Training College, Hangu.**

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

**NOTIFICATION**

Dated 07-11-2016.

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

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

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

**Result of Intermediate College Course, Term Ending 30.09.2016**

11	I-2797	Muhammad Javed Khan	723	Dir Lower	11
12	I-2807	Fazal Malik	825	Swabi	12
13	I-2930	Qazi Saleem	1210	Mardan	13
14	I-2762	Amin Ullah	62	Dir Upper	14
15	I-2892	Masood Ali	267	Shangla	14
16	I-2910	Rahim khan	5575	CCP Pesh:	15
17	I-2808	Akhtar Ali	1276	Swabi	16
18	I-2932	Sher Muhammad	1468	Mardan	17
19	I-2781	Faiz Ali	175	Shangla	18
20	I-2862	Muhammad Ijaz	63	Haripur	19
21	I-2798	Gohar	66	Swat	20
22	I-2844	Ijaz Khan	872	Nowshera	21
23	I-2926	Muhammad Farooq	1273	Mardan	22
24	I-2800	Hameed Ullah Khan	4119	CCP Pesh:	23
25	I-2921	Muathiar Shah	402	Charsadda	24
26	I-2914	Qari Hidayat Ullah	2414	CCP Pesh:	25
27	I-2785	Zahid Ullah	120/1278	Dir Upper	25
28	I-2861	Umar Hayat	468	Swat	26
29	I-2824	Khair Ullah Khan	248	Buner	27
30	I-2757	Muhammad Asif	517	Charsadda	28
31	I-2771	Sifat Ullah	408	Lakki Marwat	29
32	I-2890	Rehman Gul	1022	Mardan	30
33	I-2843	Hussain Ali,	1152	Swat	31
34	I-2906	Habib Ur Rehman	639	Mardan	32
35	I-2929	Muhammad Amin	930	Charsadda	32
36	I-2868	Waheed Ullah	1918	Dir Lower	33
37	I-2928	Alam Zeb	1094	Mardan	34
38	I-2840	Kashif Abbas	367	Abbottabad	35

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

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

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

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

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

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

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

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

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

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

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

Result of Intermediate College Course, Term Ending 30.09.2016

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

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

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

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

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

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

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

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

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

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

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

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

Prepared by In-charge Secrecy,

Checked and found correct.

Controller of Examinations,

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

*Asaad*

No. 1910-44/S dated Hangu, the 07/11-2016.

Copy for information and necessary action to:

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

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

*Asaad*

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درخواست بھرا داجرا لئٹر برائے کنفر منیشن بعدہ ASI

جناب عالی

گزارش ہے کہ من سائل نے زیر شینڈنگ آرڈر نمبری 11-1987 ، 07-2003 اور ویلیڈیشن ایکٹ نمبر 04-2005 اور بحوالہ حکم نمبری 11399-11401/E-IV مورخہ 17-11-2016 بجاریہ جناب AIG سٹیٹس پشاور خیبر پختونخوا بحیثیت کیڈٹ لاء انسٹرکٹور مورخہ 05-12-2016 کو ادارہ ہذا میں حاضری کی ہے (آرڈر کا پی و نقل مد حاضری ہمراہ لف ہیں)۔

مورخہ 04-12-2019 کو شینڈنگ آرڈرز، ایکٹ زیر بحث بالا میں مطلوبہ 03 سالہ کیڈٹ لاء انسٹرکٹور پیریڈ خوش اسلوبی سے مکمل ہو چکا ہے۔

لہذا بذریعہ درخواست استدعا ہے کہ من سائل کے آبائی ریجن ملاکنڈ کے RPO صاحب کو بعدہ ASI کنفر منیشن کے خاطر خط و کتابت فرمائی جائے۔

عین نوازش ہوگی

مورخہ: 14.12.2019

العارض  
آپکا تابع فرمان ASI ریاض علی لاء انسٹرکٹور پولیس ٹریننگ کالج ہنگو آمدہ ریجن ملاکنڈ

Keep pending

الحاج

C.L.I  
P.T.C Hangu  
16-12-2019

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ORDER

ASI Aamir Khan No.487 of Haripur, District (Now on deputation to PTC Hangu) has completed his tenure of posting at PTC Hangu i.e. 03 years as Law Instructor in accordance with Police Peshawar Standing Order No.11/87 & 07/2003. He is fulfilling the required condition for accelerated promotion.

He is therefore, confirmed in substantive rank of ASI and brought on promotion list "E" with effect from 26-04-2018.

He is allotted Region No.348/H.

SRC

Commandant  
Police Training College  
Hangu 23/5

Regional Police Officer,  
Hazara Region (Abbottabad)  
(AEC Dilawar)

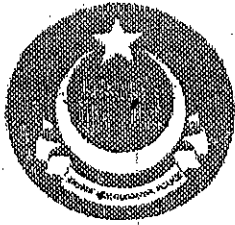
No. 14402-04 /E, Dated Abbottabad the 16/05 /2018.

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

1. ✓ Commandant Police Training College Hangu w/r to his office Memo: No.472/EC dated 24-04-2018. Service Record of above named ASI is returned herewith.
2. District Police Officer, Haripur. Necessary Gazette Notification may be issued accordingly.
3. OS/AS Region Office Abbottabad.

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Advocate



OFFICE OF THE  
REGIONAL POLICE OFFICER, MALAKAND

AT SAIDU SHARIF SWAT.

Ph: 0946-9240381 & Fax No. 0946-9240390

Email: digmalakand@yahoo.com

(26)

177  
28/6/18

**ORDER:**

As per recommendation of the Commandant PTC, Hangu vide his office memo: No. 426/EC, dated 12/04/2018; ASI Zahid Ali No. 1036 of this Region who is on deputation to PTC, Hangu, in accordance with Standing Order No. 11/1987 and 07/2003 is hereby approved by the DPC held in this office on 05/06/2018 for confirmation in the rank of ASI from the date of his completion of three period of posting in PTC Hangu i.e. 11/04/2018 according to Standing Order No. 07/2003, 11/1987 and his name is brought on promotion to list "E" with immediate effect. He is allotted Region number 870/M.

(AKHTAR HAYAT KHAN) PSP  
Regional Police Officer,  
Malakand, at Saidu Sharif Swat.

\*\*Izhar\*\*

No. 5484-86 /E,  
Dated 13-06/2018.

13/06

Copy for information and necessary action to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Commandant, PTC Hangu with reference to his office memo: No. 426/EC, dated 12/04/2018. Service records of the above name ASIs received with the memo: under reference are returned herewith for record in your office, the receipt which may please be acknowledged.
3. District Police Officer, Swat.

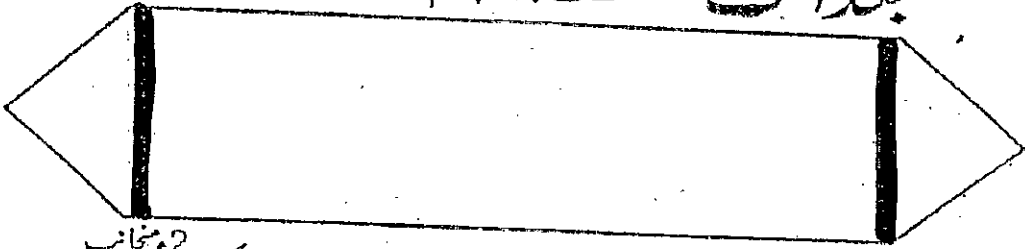
SRe  
28/6/18

ATTESTED  
to be true copy  
Advocate

ATTESTED  
to be true copy  
Advocate

10  
02

Service Tribunal بعدالت



2 مخمب

بنام P.P.O. وٹھسہ

ریاض علی

موزخہ  
مقدمہ  
دعوی  
جرم

باعث تخریب آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ  
آن مقام کیشاور کیلئے محمد علی جوہر کے نام سے درخواست  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ پر حلف دینے جو اب دہی اور اقبال دعوی اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک دور و سپر ارضی دعوی اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور مفوضی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
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 بھی وہی جملہ ذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ  
پر واخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو فریاد و رجاء التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ مندر ہے۔

الرقوم 28 ص 28  
ماہ جولائی 2023

بمقام کیشاور کے لئے منظور ہے۔

Attested  
Accepted  
[Signature]

**BEFORE THE HONORABLE KHAYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 8819/2020.

Riaz Ali ASI

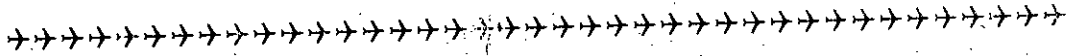
Versus

The Provincial Police Officer

& other

.....Petitioner

.....Respondents




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Dated: 27.10.2020

Respondent No. 1&2.

Through:-

  
Inspector Legal  
Fazal Maqood  
PTC Hangu

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. 8819/2020

Riaz Ali ASI, PTC Hangu .....Appellant

Versus

Provincial Police Officer, KPK Peshawar etc... Respondents.

**PARAWISE COMMENTS/REPLY OF RESPONDENTS 1&2.**

Respectfully Sheweth:

**Preliminary Objections:-**

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

**FACTS:**


1. Correct to the extent that the appellant is permanent employee of District Police Buner and presently serving as law instructor at Police Training College Hangu.
2. Correct, that the Standing Order No. 11/1987, 07/2003 and validation of Standing Order Act IV of 2005 provides incentives to within five instructors but the same have been clogged after the judgment of the Supreme Court of Pakistan noted as 2013 SCMR 1752 and 2018 SCMR 1218 dated 13.05.2018.
3. Incorrect. The appellant was transferred to PTC Hangu on deputation basis as instructor and could not claim benefit of referred Standing Orders which has been clogged after the judgment of Apex Supreme Court.
4. Correct to the extent, that the Standing order 11/1987 and 07/2003 has the expectancy of rapid promotion, but the same loses its effect after announcement of the judgments by the Apex Court of Pakistan in respect of out of turn promotion.
5. Pertains to the terms and conditions of service.
6. Pertains to record, hence no comments.

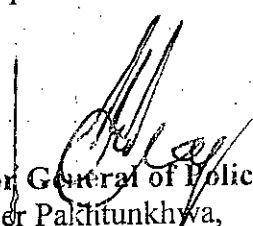
7. Correct that the appellant has completed his three years period at PTC Hangu, but after announcement of judgment of Apex Supreme Court of Pakistan on out of turn promotion the facility of confirmation has been stopped.
8. Correct to the extent that before the announcement of judgment the law instructors at the completion of three years period have been confirmed but its withdrawal is under process with the committee.
9. The appellant has wrongly arrayed the respondents through litigation before the Honorable Tribunal.

**GROUND:**

- A. That the respondents have treated the appellant in accordance with law, rules and policy on the subject and have not violated Article 4 of Islamic Republic of Pakistan. The appellant has completed the requisite period but the confirmation in the rank of ASI on the said period has been stopped after announcement of judgment of Apex Supreme Court on out of turn promotion.
- B. The respondents are no more under legal obligation to confirm the appellant in the rank of ASI and brought his name on list "E" as the seniority and promotion comes within the ambit of Region / District only.
- C. The appellant has not been discriminated in way of confirmation of juniors to appellant in list E, but they were confirmed before the announcement of Supreme Court judgment on out of turn promotion.
- D. The respondents will provide further proofs relating to the matter at the time of arguments before the Honorable Tribunal.

*It is therefore, very humbly prayed that the appeal of the appellant is not based on facts may kindly be dismissed with costs please.*

  
Commandant  
Police Training College, Hangu  
(Respondent No. 2)

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

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Service Appeal No. 8819/2020

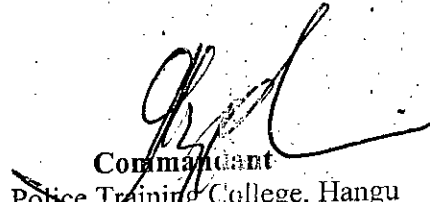
Riaz Ali ASI.....Appellant

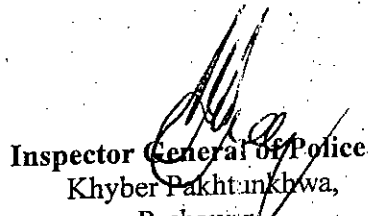
Versus

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

**AUTHORITY LETTER**

We respondent No. 1 & 2 do hereby authorized and allow Mr. Fazal Mabood Inspector Legal to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar on our behalf in connection with the Service Appeal No. 8819/2020 title as above and do whatever is needed in the Honorable Tribunal.

  
Commandant  
Police Training College, Hangu  
(Respondent No. 2)

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

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Service Appeal No8819/2020

Riaz Ali ASI.....Appellant

Versus

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

**AFFIDAVIT**

I Fazal Mabood Inspector Legal, PTC Hangu do hereby solemnly declare on oath that the content of Parawise comments submitted in reply to the Service Appeal No. 8819/2020 title as above are correct to the best of our knowledge, belief and nothing have been concealed from the Honorable Tribunal.

DEPONENT



**FAZAL MABOOD**  
Inspector/ Legal  
Police Training College Hangu  
15402-9066821-3