


12.01.2023


Nemo for parties.

Muhammad Adeel Butt learned Additional Advocate General present.

SCANNED
KPST
Peshawar

Preceding date was adjourned due to general strike of the lawyers, therefore, both the parties be put on notice for the date fixed. To come up for arguments on 13.04.2023 before D.B.


(Fareeha Paul)
Member (E)

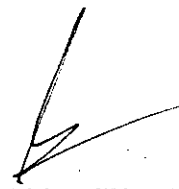

(Rozina Rehman)
Member (J)

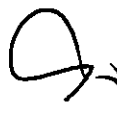
13th April, 2023

1. Clerk of counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl. Advocate General alongwith Waheed Ullah, J/C for the respondents present.

2. Lawyers are on strike. The case is adjourned to 13.06.2023 before the D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(M. Akbar Khan)
Member (Executive)


(Kalim Arshad Khan)
Chairman

**Adnan Shah, PA


22.06.2022

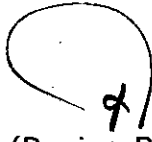
Nemo for parties.

Naseer Ud Din Shah learned Assistant Advocate General present.

Despite directions, parties were not put on notice for the reasons best known to concerned Moharrir. The matter be brought into the knowledge of learned Chairman for necessary action against the concerned. Notices be issued to both the parties for the date fixed. To come up for arguments on 30.08.2022 before D.B.

Notices issued for respondents previously counsel was also informed but not present on previous date. Once again counsel are telephonically informed for date 30/08/22



(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member (J)

30.08.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.


Learned Member (Judicial) Mrs. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 21.11.2022 before the D.B.


(Salah-Ud-Din)
Member(J)

21st Nov, 2022

Lawyers on general strike today.

To come up for arguments on 12.01.2023 before D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

22.09.2021

Junior to counsel for appellant present.

Muhammad Rasheed learned D.D.A for respondents present.

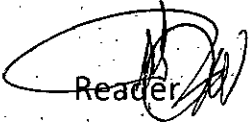
Former made a request for adjournment as senior counsel is not available today. Request is accorded. To come up for arguments on 12.01.2022 before D.B.


(Rozina Rehman)
Member (J)


Chairman

12.01.2022


Due to non-availability of the concerned DB, the case is adjourned to 28.04.2022 for the same before D.B.


Reader

28.04.2022

Nemo for the appellant. Mr. Muhammad Rasheed, District Attorney for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 22.06.2022 before the D.B.


(Mian Muhammad)
Member (E)


(Salah-ud-Din)
Member (J)

17.11.2020

Counsel for appellant present.

Muhammad Jan learned Deputy District Attorney for respondents present.

Former requests for adjournment. Request is acceded. To come up for arguments on 01.02.2021 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

01.02.2021

Due to COVID-19, the case is adjourned to 12.04.2021 for the same.

12.4.21

Due to COVID 19, the case is adjourned to 28.7.21 for the same.



Reader



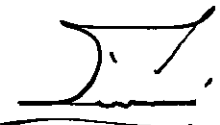
28.07.2021

Clerk of counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned. To come up for arguments before the D.B. on 22.09.2021.



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



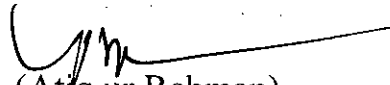
(SALAH-UD-DIN)
MEMBER (JUDICIAL)


14.09.2020

Appellant present in person .

Mr. Muhammad Jan learned Deputy District Attorney for respondents present.

Appellant submitted rejoinder with a request for adjournment as his counsel is not available. Adjourned. To come up for arguments on 17.11.2020 before D.B.



(Atiq ur Rehman)
Member (E)

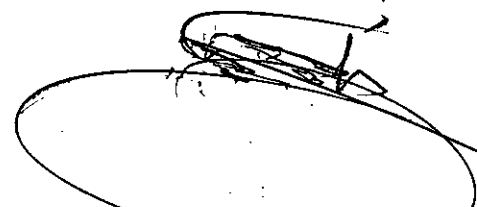

(Rozina Rehman)
Member (J)

30.09.2020

Appellant himself alongwith Mr. Nasir Mehmood, Advocate, are present. Mr. Usman Ghani, learned District Attorney alongwith Amjid Ali, Deputy Director Litigation are also present.

Appellant submitted that he is not pressing application for restraining the respondents for making promotion to the post of Superintendent BPS-17 and to the same effect he was instructed by the learned counsel. Accordingly the refer application stands dismissed. Time was sought for arguments, time is allowed. Adjourned to 17.11.2020 on which to come up for arguments before D.B


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


(Muhammad Jamal Khan)
Member (J)

16.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 13.07.2020 for the same. To come up for the same as before S.B.


Reader

13.07.2020

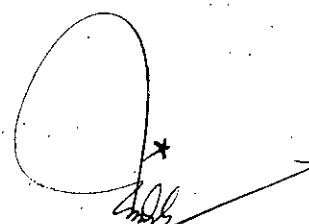
Appellant in person present. Addl: AG alongwith Mr. Farman Ali, Supdt for respondent present.

Representative of the respondents has submitted written reply ~~submitted~~ which is placed on file.

To come up for rejoinder and arguments on 14.09.2020 before D.B.

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~~_____~~
(Mian Muhammad)
Member(E)

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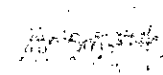
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~~_____~~
Member (J)





18.12.2019 Appellant present in person and Addl. AG alongwith Amjad Ali Shah, D.D and Sajid Superintendent for the respondents present.

Representative of respondents seeks time to furnish reply. Adjourned to 30.01.2020 on which date the requisite reply/comments shall positively be submitted.


Chairman

30.01.2020 Clerk to counsel for the appellant present. Written reply not submitted. Amjad Ali Shah Deputy Director, representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 09.03.2020 before S.B.


Member

09.03.2020 Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Farman Ali, Superintendent and Sajid, Superintendent for the respondents present. Representatives of the department seek further time to furnish reply. Last opportunity is given to the respondents. To come up for written reply/comments on 16.04.2020 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

629/2019

07.11.2019

Counsel for the appellant present.

Learned counsel has submitted an application for placing on record the departmental appeal of the appellant which was preferred before the concerned respondent on 17.01.2019 i.e. after coming into force of impugned rules dated 19.12.2018. Learned counsel also argued that although a joint departmental appeal was preferred by the appellant which was not to be regarded as legal impediment in submission of instant service appeal by the appellant singularly.

It is the case of appellant that 40% quota for promotion as Administrative Officer/Superintendent, was maintained for Senior Scale Stenographers under the rules dated 18.08.2011 whereas, the remaining 60% was allocated for Assistants. Under the impugned rules dated 19.12.2018, the quota of Senior Scale Stenographers was however, reduced to 20% without any legal or cogent reason and the remaining 20% was also added to quota of Assistants thereby enhancing the later to 80%. Additionally, the eligibility of appellant and similarly placed others for promotion was increased to five years service as Senior Scale Stenographer in the impugned rules. The rules were, therefore, highly detrimental to the rights of appellant.

In view of the available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 18.12.2019 before the S.B.

Appellant Deposited
Security & Process Fee


Chairman

06.08.2019

Appellant in person present.

Appellant requests for adjournment as his learned counsel has proceeded to perform Hajj.

Adjourned to 18.09.2019 before S.B.


Chairman

18.09.2019

Appellant present in person and once again requests for adjournment due to non-availability of his learned counsel.

Adjourned to 07.11.2019 but as a last chance.




Chairman 

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 629/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/05/2019	<p>The appeal of Mr. Sabir Ullah presented today by Mr. Nasir Mehmood 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 15/5/19</p>
2-	16/05/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/06/19</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant with counsel present. Heard.</p> <p>Learned counsel for the appellant was confronted with the issue that the present service appeal is not maintainable as departmental appeal available on file is joint, moreover the Notification challenged in the present service appeal has not been impugned in the departmental appeal. Learned counsel for the appellant seeks adjournment for proper assistance. Adjourn. To come up for preliminary hearing on 06.08.2019 before S.B</p> <p style="text-align: right;"> Member</p>
25.06.2019		

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No 629 of 2019

Sabir UllahAppellant

VERSUS

Govt of KPK & others Respondents

I N D E X

S NO	DESCRIPTION	ANNEX	PAGE
1.	Service Appeal	-	1-5
2.	Affidavit	-	6
3.	Copy of Appointment Order and Promotion order	A	7
4.	Copy of the Old Rules	B	8-20
5.	Copy of notification dated 19.12.2018	C	21-27
6.	Copy of Service Appeal	D	28-29
7.	copy of Civil Servant Rules	E	30-31
8.	Copy of office orders	F	32-33
9.	Wakalat Nama		34


Appellant

Through:

Dated: 08.05.2019


Nasir Mahmood
Advocate, Peshawar

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No _____ of 2019

Sabir Ullah S/o Baqi Khan, Senior Scale Stenographer, BPS-16
Directorate of Information and PRs Department Khyber Pakhtunkhwa
Peshawar.

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa Through Chief Secretary, Civil Secretariat Peshawar.
2. The Secretary Information & PRs Department Govt of Khyber Pakhtunkhwa Civil Secretariat Peshawar.
3. Secretary Finance Department, Govt of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
4. Secretary Establishment Department, Govt of Khyber Pakhtunkhwa Civil Secretariat Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,
AGAINST THE NOTIFICATION DATED 19.12.2018,
WHEREBY METHOD OF PROMOTION,
QUALIFICATION, AND OTHER CONDITIONS WERE
AMENDED AND THE NOTIFICATION DATED
18.08.2011 WAS AMENDED TO THE DETRIMENT OF
ACCRUED RIGHTS OF PROMOTION OF THE
APPELLANT TO THE POST OF SUPERINTENDENT /
ADMINISTRATIVE OFFICER BPS-17 AGAINST WHICH
THE DEPARTMENTAL APPEAL DATED 16.01.2019

(2)

**HAS NOT BEEN REPLIED, DESPITE THE LAPSE OF
90 DAYS.**

Prayer in Appeal: -

On acceptance of this appeal the notification dated 19.12.2018 may please be varied / modified / set aside to the extent of allowing enhanced 80% Quota to the Assistant for the purpose of promotion to the post of Administrative officer / Superintendent BPS-17 with further direction that the old rules through which 40% Quota was fixed for Senior Scale Stenographer with 5 years' service as such Or 10 years total service as a Senior Scale Stenographer and Stenographer may please be uphold.

BRIEF FACTS:-

- 1) That the Appellant was appointed in information Department in 1987 as Junior Scale Stenographer and thereafter was promoted to the post of Senior Scale Stenographer in January 2018 after a long 31 years serving as Junior Scale Stenographer. **(Copy of Appointment Order and Promotion order are attached as annexure A)**
- 2) That under the old rules criteria for promotion to the post of Administrative Officer / Superintendent BPS-17 was on the basis of Seniority cum fitness and 60 % Quota was fixed for the Assistant with 5 years' service as such and 40 Quota was fixed for Senior Scale Stenographer with 5 year service as such Or 10 Years Total Service as Senior Scale Stenographer and Stenographer. **(Copy of the Old Rules is attached as annexure B)**

- 3) That the Appellant was eligible for the post of Administrative Officer / Superintendent BPS-17 and was having legitimate expectancy to be considered for promotion but to the bad luck of the Appellant Rules were amended through notification dated 19.12.2018 through which the promotion right was taken away from the Appellant. **(Copy of notification dated 19.12.2018 is attached as annexure C)**
- 4) That the Appellant filed Departmental Appeal dated 16.01.2019 which is not been replied with in statutory period of 90 days **(Annexure D)** thus the instant appeal inter alia on the following grounds:

GROUND:-

- A) That the act of Respondents is unlawful, illegal, void ab-initio and in disregard of law applicable to the matter.
- B) That the appellant being in service since 1987 and has rendered 31 years of service and being on the verge of retirement was having legitimate expectancy to be promoted to the post of Administrative Officer / Superintendent but the rules were illegally amended, thus the promotion right of the Appellant was taken away illegally.
- C) That the total number of post of Assistants are 27 in number total number of post of Stenographers are 16 in number, thus on the basis of parity the Stenographer were entitled to 40% Quota but they have illegally been deprived of their quota which may kindly be set aside and the old Rules are liable to be restored.

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- D)** That in other department of the Civil Secretariat, the same ratio is applicable to the post of Superintendents and Private Secretaries Or personal Assistants and according to their rules 12% Quota is fixed for superintendents and 8% Quota is fixed for private Secretary or Personal Assistants for promotion to the post of PMS but the Respondents have illegally amended the rules to the detriment of the Appellant, which is liable to be set aside. **(copy of Civil Servant Rules is attached as annexure E)**
- E)** That in accordance with the new rules for promotion to the post of Administrative Officer / Superintendent 5 years' Service as Senior Scale Stenographer has been retained which is absolutely illegal because usually all the Stenographers will become retired before promotion to the post of Administrative Officer/ Superintendent, the examples are Abdul Qayyum, Nasreen Khalid and Jaffar Khan. **(Copy of office orders are attached as annexure F)**
- F)** That in accordance with the old rules, promotion of 5 years' service as Assistants has been retained and which has not been amended in the new rules, while the Service Experience has illegally been changed for the Senior Scale Stenographer.
- G)** That in accordance with new rules for promotion to the post of DG, the previous service has been counted while, in the case of the Appellant the same has been amended illegally.

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H) That other grounds will be raised at the time of arguments with the permission of this Honourable Court.

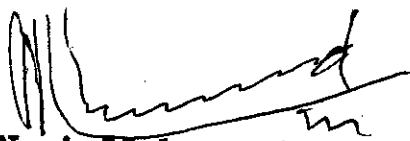
It is, therefore, respectfully prayed that On acceptance of this appeal the notification dated 19.12.2018 may please be varied / modified /set aside to the extent of allowing enhanced 80% Quota to the Assistant for the purpose of promotion to the post of Administrative officer / Superintendent BPS-17 with further direction that the old rules through which 40% Quota was fixed for Senior Scale Stenographer with 5 years' service as such Or 10 years total service as a Senior Scale Stenographer and Stenographer may please be uphold.

Any other relief, which this Honourable Court deems just and appropriate in the circumstances of the case, not specifically asked for, may also be granted in favour of Appellant.



Appellant

Through:



Nasir Mahmood

Advocate, Peshawar

Dated: 08.05.2019

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No _____ of 2019

Sabir UllahAppellant

V E R S U S

Govt of KPK & others Respondents

AFFIDAVIT

I, Sabir Ullah S/o Baqi Khan, Senior Scale Stenographer, BPS-16 Directorate of Information and PRs Department Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm and declare on Oath that all the contents of accompanied **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed **OR** withheld from this Honourable Court.


D E P O N E N T

⑦

Annex

DIRECTORATE OF INFORMATION, GOVERNMENT OF NWFP., PESHAWAR.

NO. INF/ESTT/FF/ _____ / DATED _____ / 9/1987.

OFFICE ORDER.

AS a result of the test and interview for the posts of Urdu Stenographers (Grade-12) held on Sunday September 27, 1987 following candidates are hereby appointed against the newly created posts mentioned against their names:-

<u>Name of Candidates.</u>	<u>Place of duty</u>
1. Mr. Shah Jehan Malik, S/O. Hussain Bukhsh Malik, Shayeli Awan Plaza 16-0 Gharbi Blue Area, Islamabad.	Divisional Information Office, D.I. Khan.
2. Hafiz Sabirullah S/O. Saqi Khan, C/O. Prof. Pareehan Khattak R-10 Peshawar University Campus.	Divisional Information Office Mingora, Swat.
3. Miss Nasrin Awan, Office of the Deputy Director Agriculture (I) Bureau of Agriculture Information, Jharud Road Peshawar.	Directorate of Information, Government of NWFP., Peshawar.

1. They will report to their respective places of appointments within 10 days of the issuance of this office order.

2. Their services will be governed by the usual Rules and Regulations on the subject.

3. Their appointments are purely temporary and liable to termination at any time without any notice during the probationary period as required under the Rules and at a notice of 14 days there-after on either side.

4. These appointments are subject to medical fitness of the candidates.

J. Ahmad
Assistant Director (Admin),
for Director.

Order No. INF/ESTT/FF/ 9458-68 Dated 28 / 9/1987.

Copy to:

1. All concerned.
2. Concerned files.
3. Concerned Asst. Directors.

J. Ahmad
Assistant Director (Admin),
for Director.

Vetted/ approved copy

(8)

(8)

GOVERNMENT OF KHYBER PAKHTUNKHWA, INFORMATION, PUBLIC RELATIONS AND CULTURE DEPARTMENT.

ANNEX-B

NOTIFICATION

o/c

Peshawar Dated the 18th August, 2011.

No.SO(INF)11(34)S.Rules/2011 Vol.V. In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous rules issued in this behalf, the Information Public Relations and Culture Department, in consultation with the Establishment Department and Finance Department hereby lays down the method of recruitment, qualifications and other conditions, specified in Columns 3 to 5 of the Appendix to this notification which shall be applicable to various posts in the Directorate of Information, Khyber Pakhtunkhwa as specified in column 2 of the said appendix.

APPENDIX

S. N 0	Nomenclature of Post.	Minimum qualification prescribed for appointment by initial recruitment.	Age Limit	Method of recruitment
	Director of Information (BS-19)			By Promotion on the basis of seniority-cum-fitness, from amongst the Deputy Director Information, Public Relations Officer to Governor and Station Directors with twelve years service in BPS-17 and above.

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o/c

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2.	Deputy Director Information/Public Relations Office to Governor/Station Director (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors Information, Information Officers and Producers with five years service as such.
3.	Assistant Director Information/Information Officer (BPS-17) <i>Station Manager Assistant Registrar</i>	(i) At least Second Class Master's Degree in Journalism or Mass-Communication from a recognized University; and (ii) two years practical experience in the relevant field.	21 to 32 years.	(a) Fifty per cent by promotion on the basis of seniority-cum-fitness, from amongst the Assistant Information Officers with five years services as such; and (b) fifty per cent by initial recruitment.
4.	Producer (BPS-17)	At least Second Class Master's Degree in Journalism or Mass-Communication from a recognized University with two years experience in radio programming and production.	21 to 32 years.	By initial recruitment.
5.	Budget and Account Officer (BPS-17)			By transfer on deputation from the office of Accountant General, Khyber Pakhtunkhwa.
6.	Assistant Director Programmer (BPS-17)	At least Second Class Master's Degree in Computer Science or Information Technology or equivalent qualification from a recognized University.	21 to 32 years.	By initial recruitment.

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Transmission Engineer (BPS-17)	<p>(i) At least Second Class Master's Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University with one year experience in radio transmission; or</p> <p>(ii) at least Second Class Bachelor's Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University, with two years experience in radio transmission.</p>	21 to 32 years.	By initial recruitment.
8. Assistant Information Officer (BPS-16)	<p>(i) At least Second Class Bachelor's Degree from a recognized University, with Journalism as one of the subject; or</p> <p>(ii) at least Second Class Bachelor's Degree from a recognized University with two years practical experience in Journalism.</p>	21 to 30 years.	<p>(i) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Article Writers with four years service as such; and</p> <p>(ii) seventy-five per cent by initial recruitment.</p>

(10)

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9	Administrative Officer/ Superintendent (BPS-16).			<p>By promotion, on the basis of seniority-cum-fitness, in the following manner amongst-</p> <ul style="list-style-type: none"> (a) sixty per cent from amongst the Assistants with five years service as such; and (b) forty per cent from amongst the Senior Scale Stenographers with five years service as such or ten years total service as a Senior Scale Stenographer and Stenographer (English/Urdu). <p><u>Note:</u> For the purpose of promotion, separate seniority list of the Assistants and the Senior Scale Stenographers shall be maintained on the basis of their continuous appointment to the respective posts.</p>
10.	Film Production Officer (BPS-16).		Production	By promotion, on the basis of seniority-cum-fitness, from amongst the Cameramen with seven years service as such.
11.	Pictorial Publicity Officer (BPS-16).		Pictorial Publicity	By promotion, on the basis of seniority-cum-fitness, from amongst the Photographer-cum-Cameraman with at least five years service as such.

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12.	Junior Transmission Engineer (BPS-16).	<p>(i) At least Second Class Bachelor's Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University; or</p> <p>(ii) Diploma of Associate Engineering with one year experience in Radio transmission.</p>	21 to 32 years.	By initial recruitment.
13.	News Editor (BPS-16).	<p>(i) At least Second Class Bachelor's Degree from a recognized University; and</p> <p>(ii) two years experience of audio editing in Radio.</p> <p><u>Note:</u> Preference will be given to those having command on Pashto and Urdu Languages and computer literate.</p>	21 to 32 years.	By initial recruitment.

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14	Audio Editor (BPS-16)	(i) At least Second Class Bachelor's Degree from a recognized University; (ii) two years experience in audio editing; and (iii) one year experience in adobe Audition. <u>Note:</u> Preference will be given to Information Technology certificate or diploma holder.	21 to 32 years.	By initial recruitment
15	Senior Scale Stenographer (BPS-15)			By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers English/Urdu with five years service as such. <u>Note:</u> A joint seniority list of Stenographers (English/Urdu) shall be maintained.
16	Assistant (BPS-14)	At least Second Class Bachelor's Degree from a recognized University.	20 to 30 years.	(a) Sixty-seven per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with at least three years service as such; and (b) thirty-three per cent by initial recruitment

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	Non-Linear Editor (BPS-14)	<ul style="list-style-type: none"> (i) At least Second Class Bachelor's Degree from a recognized University; (ii) one year Diploma in Information Technology from a recognized Technical Board; and (iii) three years experience in Non-Linear Editor and Video Composition. 	21 to 32 years.	By initial recruitment.
18.	Cameraman (BPS-13)	<ul style="list-style-type: none"> (i) Intermediate Certificate from a recognized Board; and (ii) three years experience in out door cinematography and full knowledge of technical processing of documentary and news reel films. 	21 to 30 years.	By initial recruitment.
19.	Stenographer (English/Urdu) (BPS-12)	(i) Intermediate or equivalent qualification from a recognized Board;	18 to 30 years.	By initial recruitment.

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20.	XXXXXXXXXX	(ii) speed of fifty words per minute in English/Urdu shorthand and thirty-five words per minute in English/Urdu typing speed; and (iii) MS Word & MS Excel for English and Inpage for Urdu Sterographer.	20 to 30 years.	By Initial recruitment.
21.	Article Writer (BPS-11)	(i) At least Second Class Bachelor's Degree in Journalism as one of the subject from a recognized University; and (ii) one year practical experience of writing press articles and doing translation work.	20 to 30 years.	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Translators with at least three years service as such; and (b) fifty per cent by initial recruitment.

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22.	Photographer-cum-Cameraman (BPS-11).	Intermediate with three years experience of still working in computer Photoshop program and video photography with an established Agency.	18 to 30 years.	(a) Seventy per cent by promotion, on the basis of seniority-cum-fitness, from amongst Dark Room Attendants with three years service as such; and (b) thirty per cent by initial recruitment.
23.	Telecom Electric Technician (BPS-11).	Three years Diploma in Electrical Engineering from a recognized Institute or Technical Board. Note: Preference will be given to Information Technology literate.	18 to 30 years.	By initial recruitment. By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks with atleast two years service as such.
24.	Senior Clerk (BPS-09).			By initial recruitment.
25.	Operator (BPS-08).	Intermediate with two year experience of operating video-audio equipment.	20 to 35 years.	By initial recruitment.
26.	Junior Clerk (BPS-07).	(i) Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) a speed of thirty words per minute in typing.	18 to 30 years.	(a) Thirty-three per cent by promotion, from amongst the Daftaries having Secondary School Certificate with two years service as such; and (b) sixty-seven per cent by initial recruitment.

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Telephone Operator (BPS-07)	Intermediate or equivalent qualification from a recognized Board.	18 to 30 years.	By initial recruitment.
Translator (BPS-06)	(i) Intermediate from a recognized Board; and (ii) ability to translate from English to Urdu and vice versa.	18 to 30 years.	By initial recruitment.
Dark Room Attendant (BPS-05)	(i) Secondary School Certificate from a recognized Board; and (ii) two years practical experience of working in computer Photoshop program and video operating camera in some renowned Photo Studio, Newspapers or a Government Organization.	18 to 30 years.	By initial recruitment.
Driver (BPS-04)	Literate having valid driving licence.	18 to 35 years.	By initial recruitment.

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(59) (7) 85

31	Lightman (BPS-03)	Middle School Certificate with good knowledge making electric connections and throwing of light under the instruction of cameraman.	18 to 35 years.	By initial recruitment.
32	Dafti (BPS-02)			By promotion, on the basis of senibrity cum fitness, from amongst Naib Qasids, Cleaners, Chowkidars, Dak Runners, Despatch Riders, Malis, Camera Coolis or Sweepers who have passed Secondary School Examination with three years service as such.
33	Naib Qasid (BPS-01)	Literate.	18 to 35 years.	By initial recruitment.
34	Cleaner (BPS-01)	Literate.	18 to 35 years.	By initial recruitment.
35	Dak Runner (BPS-01)	Literate having valid LTV licence.	18 to 35 years.	By initial recruitment.
36	Dispatch Rider (BPS-01)	Literate having valid LTV licence.	18 to 35 years.	By initial recruitment.
37	Mali (BPS-01)	Preferably literate having experience in gardening.	18 to 40 years.	By initial recruitment.
38	Chowkidar (BPS-01)	Literate.	18 to 40 years.	By initial recruitment.

M

39	Sweeper (BPS-01)	Literate	18 to 40 years	By initial recruitment
40	Camera Coolie (PBS-1)	Literate	18 to 35 years	By initial recruitment

(17)

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
INFORMATION, PUBLIC RELATIONS AND CULTURE DEPARTMENT



**DIRECTORATE GENERAL INFORMATION & PRs
KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt:/ 1-59(A)/ _____
Dated Peshawar the ____/____/2018

OFFICE ORDER

Consequent upon recommendation of the Departmental Promotion Committee (DPC) meeting held on January 04, 2018 at 10:30 AM, Mr. Sabir Ullah, Stenographer (BPS-14) is hereby promoted as Senior Scale Stenographer (BPS-16) against the vacant post in Pakhtunkhwa Radio FM 92.2 MHz, Peshawar of the Directorate General Information & PRs, Khyber Pakhtunkhwa with immediate effect.

The promoted official will remain on probation in terms of Rule 6(2) of the Khyber Pakhtunkhwa Civil Servant Act 1973 read with Rule 15(1) & (2) of the Khyber Pakhtunkhwa Government Servant (Appointment, Promotion & Transfer) Rules 1989 for a period of one year extendable for another year.

Sd/-
**DIRECTOR GENERAL
INFORMATION & PUBLIC RELATIONS
KHYBER PAKHTUNKHWA**
Date Peshawar, the 21/1/2018

Endst.No. INF/Estt:/ 1/59(A)/ 152-59

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary Information & PRs Department, Govt: of Khyber Pakhtunkhwa, Peshawar.
3. Station Director, Pakhtunkhwa Radio FM 92.2 MHz, Peshawar.
4. Section Officer (Establishment), Information and Public Relations Department, Govt: of Khyber Pakhtunkhwa, Peshawar.
5. Mr. Sabir Ullah, Senior Scale Stenographer.
6. P/File of the official.
7. Bill Clerk.
8. Office Order File.


**DEPUTY DIRECTOR (ADMIN)
FOR DIRECTOR GENERAL**

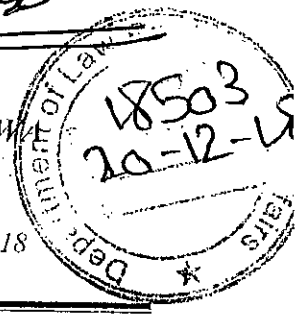


GOVERNMENT OF KHYBER PAKHTUNKHWA
INFORMATION & PUBLIC RELATIONS
DEPARTMENT

Dated Peshawar, the 19th December, 2018

(21)

Annex-C



NOTIFICATION

No.SO(Estt):11-34/SSRC/2018/Vol-III: In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of this Department's Notification No. SO.Estt:(INF)11-34/SSRC/2018 Vol.III, dated: 08-05-2018, the Information and Public Relations Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO(INF)11(34) S.Rules/2011/Vol-V, dated 18-08-2011, the following further amendments shall be made, namely;

AMENDMENTS

In the Appendix,-

- (a) Serial No.1 shall be re-numbered as Serial No. "1A" and before Serial No. 1A, as so re-numbered, the following new entries shall be inserted in the respective columns, namely:

1	2	3	4	5
1	Director General (BPS-20)	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Director Information (BPS-19) and Press Registrar (BPS-19) with seventeen (17) years service in BS-17 and above subject to successful completion of Senior Management Course (SMC); Provided that if no suitable officer is available from amongst the Director Information and Press Registrar (BPS-19) then by transfer from PAS and PMS officers. Note: A Joint seniority list of the Director Information (BPS-19) and Press Registrars (BPS-19) shall be maintained for the purpose of promotion."

Reg: 116/75

- (b) against Serial No. 1A as so re-numbered, in columns No. 2 and 5, for the existing entries, the following shall be substituted, namely:

2	5
Director Information/ Press Registrar (BPS-19)	By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors Information, Public Relations Officers to Governor and Station Directors (BS-18) with twelve years service in BPS-17 and above subject to successful completion of five (05) weeks mandatory training at Information Services Academy (ISA) Islamabad or any Government Training Institute."

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20/12
21/12

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21/12/18

(c) against Serial No. 2, in column No.5, for the existing entry, the following shall be substituted, namely:

5
“By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors Information, Information Officers and Producers with five years service as such subject to successful completion of five weeks mandatory training at Information Services Academy (ISA) Islamabad or any Government Training Institute.”;

(d) against Serial No. 2A, in column No.5, for the existing entry, the following shall be substituted, namely:

5
“By promotion on basis of seniority-cum-fitness from amongst the Assistant Director (I.T) (BPS-17) with five years service as such.”;

(e) for Serial No. 3, the following shall be substituted, namely:

1	2	3	4	5
3.	Assistant Director Information/ Information Officer/ Station Manager / Assistant Registrar / Producer (BPS-17).	At least Second Class Master’s Degree or BS (4 years) in Journalism, Mass Communication, International Relations, English and Sociology from a recognized University.	21 to 35 Years.	<p>(i) Forty percent (40%) by promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Information Officers and Assistant Producers (BS-16) with five years services as such subject to successful completion of five weeks mandatory training at Information Services Academy (ISA) Islamabad or any Government Training Institute.</p> <p>Note: For the purpose of promotion joint seniority of Assistant Information officers and Assistant Producers shall be maintained;</p> <p>(ii) ten percent (10%) by promotion on the basis of Seniority-cum-fitness, from amongst the Superintendents and Administrative Officers (BS-17) having Second Class Bachelor’s Degree from a recognized University with five year service as such subject to successful completion of five weeks mandatory training at Information Services Academy (ISA) Islamabad or any Government Training</p>

				<p style="text-align: center;">Institute.</p> <p>Note: For the purpose of promotion joint seniority of Superintendents and Administrative Officer shall be maintained; and</p> <p>(iii) fifty percent (50%) by initial recruitment.”.</p>
--	--	--	--	--

(f) Serial No. 4 shall be deleted;

(g) for Serial No. 5, the following shall be substituted, namely:

1	2	3	4	5
“5.	Budget and Account Officer (BPS-17)	At least Second Class Masters’ Degree in Commerce or BS (Finance) (4 years) and MBA (Finance) or relevant equivalent qualification from a recognized University.	20 to 35 Years.	By initial recruitment.”.

(h) for Serial No. 6, the following shall be substituted, namely:

1	2	3	4	5
“6-A.	Assistant Director (I.T) (BPS-17)	At least Second Class Master’s Degree / BS four (4) years in Computer Science or Information Technology or equivalent qualification from a recognized university	21 to 35 years	<p>(i) Fifty percent (50%) by promotion on the basis of seniority-cum-fitness from amongst the Assistant Network Administrators and Assistant Web Administrators (BPS-16)/ Computer Operators (BPS-16) and I.T Assistant (BPS-16) with five years service as such; and</p> <p>(ii) fifty percent (50%) by initial recruitment.</p> <p>Note: A Joint list seniority of Assistant Network Administrators, Assistant Web Administrator (BPS-16), Computer Operators (BPS-16) and I.T Assistants (BPS-16) shall be maintained for the purpose of promotion.”.</p>

(i) against Serial No. 6A, in columns No. 3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
“A least Second Class Master’s Degree in Computer Science and Information Technology or BS (4 Years) in Computer Science/IT or equivalent qualification from a recognized University.	21 to 35 years.”;

24

(j) against Serial No. 7, in columns No. 3, 4 and 5, for the existing, the following shall be substituted, namely:

3	4	5
(i) At least Second Class Master's Degree / BS (4 year) in Electronics or Electrical Engineering (Telecommunication) from a recognized University; or (ii) At least Second Class Bachelor Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University.	21 to 35 years	(i) Twenty-five percent (25%) by promotion, on the basis of seniority-cum-fitness, from amongst the Junior Transmission Engineer, (BS-16) with five years service as such; and (ii) seventy five percent (75%) by initial recruitment."

(k) after Serial No. 7, the respective columns, the following entries, shall be inserted, namely:

1.	2	3	4	5
"7A.	Statistical Data Analyst (BPS-17)	At least Second Class Master's Degree in Statistics or BS (4 years) or relevant equivalent qualification from a recognized university.	21 to 35 years	By initial recruitment.
7B.	Audio Visual Producer (BPS-17)	----	----	By promotion, on the basis of seniority-cum-fitness, from amongst the Non Linear Editors (BPS-15) with at least five years service as such.";

(l) against Serial No. 8, in column No.2, for the existing entries, the following shall be substituted, namely:

2
"Assistant Information Officer/Assistant Producers/Sub Editor (BPS-16).";

(m) after Serial No. 9, in column No.5, for the existing entries, the following shall be substituted, namely:

5
"By promotion, on the basis of seniority-cum-fitness, in the following manner, namely: (i) eighty percent (80%) from amongst the Assistants (BPS-16) with five years service as such; and (ii) twenty percent (20 %) from amongst the Senior Scale Stenographers (BPS-16) with five years service as such.

(25)

Note: For the purpose of promotion, separate seniority lists of the Assistants and the Senior Scale Stenographer shall be maintained.”

(n) after Serial No. 14, in the respective columns, the following new entries shall be inserted, namely:

1	2	3	4	5
“14-A	Graphics Designer (BPS-16)	At least Second Class Bachelors Degree in Fine Arts with Communication Design as a subject from a recognized University.	18 to 32 years.	By initial recruitment.”.

(o) against Serial No. 12, in Column No. 5, for the existing entries, the following shall be substituted, namely:

5
“(a) Twenty-five percent (25%) by promotions on the basis of seniority-cum-fitness, from amongst the Telecom Electric Technicians (BPS-12) with five year service as such; and (b) seventy five percent (75%) by initial recruitment.”.

(p) against Serial No. 13, in column No. 3, for the existing entry, the following shall be substituted, namely:

3
“At least Second Class Bachelor’s Degree from a recognized University having experience in Copy Editing/ Print / Electronic Media.”;

(q) against Serial No. 14, in column No. 3, for the existing entry, the following shall be substituted, namely:

3
“At least Second Class Bachelor’s Degree from a recognized University having complete Audio Editing Course.”.

(r) against Serial No. 15, in column No. 5, for the existing entry, the following shall be substituted, namely:

5
“By promotion, on the basis of seniority-cum-fitness, from amongst Stenographer English/Urdu with five years service as such.”;

(s) against Serial No. 16, in columns No.4 and 5, for the existing entries, the following shall be substituted, namely:

4	5
“20 to 32 years.	(a) Seventy-five percent (75 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with at least five years service as Junior and Senior Clerk; and

(b) twenty five percent (25%) by initial recruitment.”;

- (t) against Serial No. 17, in column No.3, for the existing entry, the following shall be substituted, namely:

3
“At least Second Class Bachelor’s Degree and having experience in video editing and videography.”;

- (u) against Serial No. 18, in column No.3, for the existing entry, the following shall be substituted, namely:

3
“At least Second Division Intermediate or equivalent qualification from a recognized Board and having two (2) years experience of still photography, Photo editing and videography.”;

- (v) against Serial No. 20, in column No. 2, after the words, brackets and figure “Computer Operator (BPS-16)” the oblique, words, brackets and figures “/I.T Assistant (BPS-16)” shall be added;

- (w) against Serial No. 21, in columns No. 3, 4 and 5, for the existing entries, the following shall be substituted, namely:

3	4	5
“(a) At least Second Division Intermediate from a recognized Board; and	18 to 30 years.	By initial recruitment.”;
(b) ability to translate from English to Urdu and vice versa.		

- (x) against Serial No. 22, in columns No. 3 and 5, for the existing entries, the following shall be substituted, namely:

3	5
“At least Second Division Intermediate or equivalent qualification from a recognized Board and having one year experience of still photography, Adobe Photoshop and Video Photography.	By initial recruitment.”;

- (y) against Serial No. 23, in column No. 3, for the existing entry, the following shall be substituted, namely:

3
“Three years Diploma in Electrical Engineering from a recognized Institute or Technical Board.”;

- (z) after Serial No. 23, in the respective columns, the following new entries shall be inserted, namely:

27

1	2	3	4	5
"23-A	IT Technician (BPS-11)	DAE (Electrical) with one year experience in Electrical/ telecom/ network/ cabling/ wiring/ installation/ satellite receiver and other allied accessories.	18 to 32 years.	By initial recruitment.";

(aa) Serial No. 25 shall be deleted;

(bb) against Serial No. 30, in column No. 4, for the existing entry, the following shall be substituted, namely:

4
"18 to 40 years.";

(cc) against Serial No. 33, in columns No. 4 and 5, for the existing entries, the following shall be substituted, namely:

4	5
18 to 40 years	(a) Fifty percent (50%) by initial recruitment; and (b) fifty percent (50%) by transfer from the other Class-IV (BPS-3) employees of the Director General Information.";

(dd) against Serial No. 34, in column No.4, for the existing entry, the following shall be substituted, namely:

4
"18 to 40 years."; and

(ee) against Serial No. 35, in column No.4, for the existing entry, the following shall be substituted, namely:

4
"18 to 40 years.".

6858-63

Secretary to
Government of Khyber Pakhtunkhwa
Information and Public Relations, Department

Endst: No.SO(Estt):11-34/SSRC/2018/Vol-III

Dated: Peshawar the 19th December, 2018

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

1. Secretary Establishment, Government of Khyber Pakhtunkhwa.
2. Secretary Finance, Government of Khyber Pakhtunkhwa.
3. Secretary Law & Parliamentary Affairs, Government of Khyber Pakhtunkhwa.
4. Director General, Directorate General Information & PRs, Khyber Pakhtunkhwa.
5. Secretary Public Service Commission, Khyber Pakhtunkhwa.
6. P.S to Chief Secretary, Govt. of Khyber Pakhtunkhwa.
7. P.S to Secretary Information & Public Relation Department.
8. Manager, Government Stationery & Printing Department with the request to provide 50 copies of the Gazette Notification.


Section Officer (Establishment)

بخدمت جناب سیکرٹری انفارمیشن اینڈ پبلک ریلیشنز گورنمنٹ آف خیبر پختونخوا

عنوان:- درخواست برائے سٹیٹوگرافرز کی سپرنٹنڈنٹ کی پوسٹ پر ترقی کی 40 فیصد کوٹہ کی بحالی

جناب عالی:-

مودبانہ گزارش ہے کہ دیگر صوبائی محکموں کی طرح محکمہ اطلاعات و تعلقات عامہ کی 2011ء میں سروس رولز مرتب کئے گئے تھے۔ جس میں سٹیٹوگرافرز کی سپرنٹنڈنٹ کی پوسٹ پر ترقی کا 40 فیصد کوٹہ مقرر کیا گیا تھا (کاپی لف ہے۔ الف) جس کو محکمہ نظامت اطلاعات کے کلریکل سٹاف (اسٹینٹس) نے 2012ء میں خیبر پختونخوا سروس ٹریبونل میں چیلنج کیا گیا تھا جو تقریباً تین سال تک سروس ٹریبونل میں زیر بحث رہا اور آخر کار اسٹینٹ کیڈر کے تمام ایپیلوں کو رد کرتے ہوئے سٹیٹوگرافروں کی سپرنٹنڈنٹ کی پوسٹ پر ترقی کا 40 فیصد کوٹہ بحال رکھا (کاپی لف ہے۔ ب)۔

اب جبکہ ہمیں معلوم ہوا ہے کہ آپ کے زیر سایہ نظامت اطلاعات و تعلقات عامہ کے سینیڈنگ سروس رولز کمیٹی کے میٹنگ جاری ہے جس میں زیادہ تر آسامیوں پر ترقی کے مواقع کے لئے ٹریمیم و تجاویز زیر غور ہیں جبکہ سٹیٹوگرافرز کی سپرنٹنڈنٹ کی پوسٹ پر ترقی 40 فیصد کوٹہ کم کر کے 20 فیصد کیا جا رہا ہے۔ جو سراسر نا انصافی ہے۔

جناب عالی!

ہم بتاتے چلے کہ نظامت اطلاعات و تعلقات عامہ میں کل تین سینئر سکیل سٹیٹوگرافرز (B-16) اور 13 جونیئر سکیل سٹیٹوگرافرز (B-14) کی آسامیاں موجود ہیں۔ اگلے پوسٹوں پر ترقی نہ ہونے کی وجہ سے زیادہ تر جونیئر سکیل سٹیٹوگرافرز (B-14) میں بھرتی ہو کر تیس پینتیس سال تک نوکری کر کے بھی اسی گریڈ میں ریٹائرڈ ہو جاتے ہیں۔ جن کی مثال عارف، شاہ جہاں، عزیز الرحمان اور محمد ناصر سٹیٹوگرافروں وغیرہ کی موجود ہے جبکہ کلریکل سٹاف کے 13 جونیئر کلرکس 12 سینئر کلرکس اور 24 اسٹنٹ کی آسامیاں موجود ہیں۔ جس میں جونیئر کلرکس کی آسامیوں کے لئے 33% فیصد کوٹہ کلاس فور ملازمین کا بھی موجود ہے جو نائب قاصد یا کلاس فور بھرتی ہو کر سپرنٹنڈنٹ کی پوسٹ پر ترقی کر جاتے ہیں کیونکہ ان کے ترقی کے واضح اور روشن راستے موجود ہیں جن کی زندہ مثال نواب علی کی سپرنٹنڈنٹ ہے جو نائب قاصد سے ترقی کرتے ہوئے حال ہی میں سپرنٹنڈنٹ کی پوسٹ (B-17) پر پرموٹ کیا گیا ہے جبکہ سٹیٹوگرافروں کی ترقی اس کے برعکس ہے۔ تیس پینتیس سال تک نوکری کر کے بھی اسی گریڈ میں ریٹائرڈ ہو جاتے ہیں۔ جن کی مثال عارف، شاہ جہاں، عزیز الرحمان اور محمد ناصر سٹیٹوگرافروں وغیرہ کی موجود ہے

(صفحہ نمبر 2 جاری)

جناب عالی!

نظامت اطلاعات و تعلقات عامہ میں جو نیئر سکیل شیوگر افروز (B-14) کی 13 سینئر سکیل شیوگر افروز (B-16) پر ترقی کا موقع موجود ہے جبکہ نظامت کی 12 سینئر کلرکس (B-14) کے لئے اسٹنٹ (B-16) پر ترقی کے لئے 16 آسامیاں موجود ہیں جو ترقی کا 160 فیصد ہے جبکہ جو نیئر سکیل شیوگر افروز کی ترقی 30 فیصد ہے

جناب عالی!

جب کوئی محکمہ میں جو نیئر کلرک بھرتی ہوتا ہے تو وہ چند ہی سالوں میں سو فیصد کوٹہ ہونے کی وجہ سے سینئر کلرکس (B-14) سے اسٹنٹ (B-16) میں ترقی کر جاتا ہے اور کچھ عرصہ بعد اسٹنٹ (B-16) سے سپرنٹنڈنٹ (B-17) میں ترقی کر جاتا ہے جبکہ ہم جو نیئر سکیل شیوگر افروز اب بھی 30 سال 35 سال نوکری کر کے بھی اسی گریڈ میں موجود ہیں ہمیں پہلے بھی فورٹا فارمولہ میں نظر انداز کیا گیا ہے۔

لہذا ہم جملہ شیوگر افروز استدعا کرتے ہیں کہ شیوگر افروز کی سپرنٹنڈنٹ کی پوسٹ پر 40 فیصد کوٹے کو بحال رکھا جائے۔ نہایت ہی ممنون و مشکور رہیں گے۔

العارض

درخواست گزاران

- | | | | |
|-------|--|-------|--|
| (1) - | جعفر خان سینئر سکیل شیوگر افروز گورنر ہاؤس | (2) - | عبدالقیوم سینئر سکیل شیوگر افروز |
| (3) - | صابر اللہ سینئر سکیل شیوگر افروز | (5) - | انور خان خلیل جو نیئر سکیل شیوگر افروز |
| (4) - | شہناز اختر جو نیئر سکیل شیوگر افروز | (7) - | حسن علی شاہ جو نیئر سکیل شیوگر افروز |
| (6) - | جہانگیر جو نیئر سکیل شیوگر افروز | (9) - | فقیر حسین جو نیئر سکیل شیوگر افروز |
| (8) - | محمد یوسف جو نیئر سکیل شیوگر افروز | | |

کاپی برائے اطلاع:-

- (1) ڈائریکٹر جنرل، نظامت اطلاعات و تعلقات عامہ خیبر پختونخوا ایشاور
- (2) سیکشن آفیسر (اسٹبلشمنٹ) اطلاعات و تعلقات عامہ حکومت خیبر پختونخوا ایشاور
- (3) سیکشن آفیسر (اسٹبلشمنٹ) محکمہ اسٹبلشمنٹ حکومت خیبر پختونخوا ایشاور
- (4) سیکشن آفیسر (لاء) محکمہ لاء ڈیپارٹمنٹ حکومت خیبر پختونخوا ایشاور
- (5) سیکشن آفیسر (مناسن) مناسن بیار منٹ حکومت خیبر پختونخوا

SCHEDULE-I

S. No.	Nomenclature of posts	Minimum qualification for appointment by initial recruitment	Age Limit for initial recruitment	Method of Recruitment
1	2	3	4	5
1	PMS (BS-17) as per detail at schedule-II	<p>2ND Division Bachelor Degree from a recognized University</p> <p>Provided that a candidate who has obtained a 3rd Division or D-Grade in Bachelor's Degree will be eligible for the examination in cases where he/she has obtained a higher Division in Master's Degree.</p>	21-30 Year	<p>1) Fifty per cent by initial recruitment on the recommendations of the Commission based on the result of competitive examination to be conducted by it in accordance with the provisions contained in ³Schedule-VIII.</p> <p>2) Subject to rule 7, by promotion in the following manner:</p> <p>(a) twenty per cent from amongst Tehsildars, who are graduates, on the basis of seniority-cum-fitness, having three years service as Tehsildar/Naib Tehsildar and have undergone a training course of nine weeks at the Pakistan Provincial Services Academy or Provincial Staff Training Institute;</p> <p>(b) twelve per cent, on the basis of seniority-cum-fitness, from amongst Superintendents, who are graduates having three years service as Superintendent or Assistant and have undergone a training course of nine weeks at the Pakistan Provincial Services Academy or Staff Training Institute; and"</p> <p>(c) eight per cent, on the basis of seniority-cum-fitness, from amongst Private Secretaries or Personal Assistants, who have opted to join Provincial Management Service and are graduates with three years service as Private Secretary or Personal Assistant and have undergone a training course of nine weeks at the Pakistan Provincial Services Academy or Staff Training Institute."</p> <p>3) Ten per cent by selection on merit, on the basis of competitive examination, to be conducted by the Commission in accordance with the provisions contained in Schedule-VIII, from amongst persons holding substantive posts of Superintendents, Private Secretaries, Personal Assistants, Assistants, Senior Scale Stenographers, Stenographers, Data Entry Operators, Computer Operators, Senior and Junior Clerks borne on the cadres strength of Secretariat who possess 2nd Class Bachelor's Degree from a recognized University and have at least five years service as such.</p>
2.	PMS(BS-18) as	NIL		By promotion on seniority-cum-fitness basis, from amongst

	per detail at schedule-II			the officers of PMS in BS-17 having at least five years service and have passed the prescribed Departmental Training or Departmental Examination.
3.	PMS(BS-19) as per detail at schedule-II	NIL	-	By promotion on the basis of Seniority-com-fitness, from amongst PMS officers holding posts in BS-18 and having at least 12 years service against posts in BS-17 and above and passed the prescribed Departmental Training/ Examination.
4.	PMS(BS-20) as per detail at schedule-II	NIL	-	By promotion on the basis of Selection-on-merit, from amongst PMS officers holding posts in BS-19 and having at least 17 years service against posts in BS-17 and above and have Undergone Advance Training Course from NIPA or any other training course prescribed by Government.
5.	PMS(BS-21) as per detail at schedule-II	NIL	-	By promotion on the basis of Selection-on-merit, from amongst PMS officers holding posts in BS-20 and having at least 22 years service against posts in BS-17 and above and have Undergone Course from Pakistan Administrative Staff collage/National Defence Collage or from any other training Institute prescribed by Government,



(32)
DIRECTORATE GENERAL INFORMATION & PRs
KHYBER PAKHTUNKHWA, PESHAWAR

ANNEX-F

No. INF/Estt:/1/28/_____ Dated Peshawar the, ___/___/2018

OFFICE ORDER

In exercise of the powers conferred on me vide Finance Department, Khyber Pakhtunkhwa letter No. FD(SR-IV)15-54/81-Vol-II, dated 20.11.1981, sanction to the encashment of 365 days in lieu of L.P.R is hereby accorded in favour of Mr. Abdul Qayum, Senior Scale Stenographer (BS-16), Directorate General Information & PRs, Khyber Pakhtunkhwa, Peshawar. He will stand retired from service on 31/12/2018 (Afternoon) on attaining the age of superannuation i.e. 60 years.

-Sd/-
DIRECTOR GENERAL
DIRECTORATE GENERAL INFORMATION & PRs,
KHYBER PAKHTUNKHWA

Endst: No. INF/Estt:/1-28/ 4508-12 Dated Peshawar, the 31/12/2018

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Mr. Abdul Qayum, Senior Scale Stenographer.
3. Bill Clerk.
4. Personal File of the official.
5. Office order file.


ASSISTANT DIRECTOR (ADMIN)
FOR DIRECTOR GENERAL

Signature

33



**DIRECTORATE GENERAL INFORMATION & PRs
KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt./1/28/_____
Dated Peshawar the ____/____/2017

OFFICE ORDER

In exercise of the powers conferred on me vide Finance Department, Government of Khyber Pakhtunkhwa letter No. FD(SR-IV)15-54/81-Vol-II, dated 20.11.1986, sanction to the encashment of 365 days in lieu of L.P.R is hereby accorded in favour of Mrs. Nasreen Khalid, Senior Scale Stenographer (BS-16), Directorate of Information, Khyber Pakhtunkhwa, Peshawar. She will stand retired from service on 29/12/2017 (Afternoon) on attaining the age of superannuation i.e 60 years.

Sd/=

**DIRECTOR INFORMATION,
KHYBER PAKHTUNKHWA**

Dated Peshawar, the 26/12/2017

Endst: No. INF/Estt./1-28/2869-73

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Mrs. Nasreen Khalid, Senior Scale Stenographer.
3. Bill Clerk.
- ✓ 4. Personal File of the official.
5. Office order file.

**ASSISTANT DIRECTOR (ADMN)
FOR DIRECTOR**

W

قیمت 50 روپے	7110			
ایڈوکیٹ: <u>ذوالفقار محمد درانی</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>B-3298</u>				
رابطہ نمبر: <u>0333-9176225</u>				

بعدالت جناب: سرور شہزاد بیگم فیروز پختونخواہ

مخاطب: <u>میسٹر</u>	دعویٰ:
<u>صاحب اللہ</u>	علت نمبر:
<u>بنام</u>	مورخہ:
<u>گورنمنٹ</u>	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام پشاور کیلئے ذوالفقار محمد درانی کو وکیل 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 برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق و زبانی پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر 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 یقیناً کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ 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

المقوم: ذوالفقار محمد درانی

DEPT. OF LAW ASSOCIATION
PESHAWAR

مقام: پشاور

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 629 /2019

Sabirullah _____ Appellant

Versus

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat
Peshawar and others _____

.....Respondents

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2.	Letter No. SO.Estt:(INF)4- 175/2017/Vol:II dated 07-01- 2020		02
3.	Comments		03-04
4.	Govt Of Khyber Pakhtunkhwa, Information & Public Relations Department Notification No. SO(INF)11(34)S.Rules/2011 Vol.V dated 18-08-2011	I	05-16

DEPONENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 629 /2019

Sabirullah s/o Baqi Khan, Senior Scale Stenographer, Directorate General Information & PRs, Khyber Pakhtunkhwa

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
2. The Secretary Information & PRs Department, Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
3. Secretary Finance Department, Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
4. Secretary Establishment Department, Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar

_____ Respondents

AFFIDAVIT

I Mr. Mian Amjad Ali Shah, Deputy Director (Litigation) Peshawar. Do hereby solemnly affirm and declare on oath that the contents Additional Department are true and correct into the best of my knowledge and behalf that nothing has been concealed from the Hon'ble Court.

DEPONENT:

CNIC NO: _____

17301-2564562-5

Identified by Advocate
General, Khyber
Pakhtunkhwa, Peshawar.



GOVERNMENT OF KHYBER PAKHTUNKHWA
INFORMATION & PUBLIC RELATIONS
DEPARTMENT
091-9223527

No. SO.Estt:(INF)4-175/2017/Vol:II
Dated Peshawar the 7th January, 2020

To

The Director General,
Directorate General Information & P.Rs.
Khyber Pakhtunkhwa.

QUALITY 70
DATE 8-1-2020
DIRECTOR GENERAL
Directorate General Information & P.Rs.
Khyber Pakhtunkhwa Peshawar

Subject: - JOINT PARAWISE COMMENTS

I am directed to refer to your letter No. INF/LIT/8555 dated 31st December, 2019 on the subject noted above and to return herewith joint parawise comments with the request to depute departmental representative to vet the same from Additional Advocate General, Service Tribunal at the earliest and resubmit to this Department for signatures of the respondents.

Section Officer (Establishment)

Encl: as above.
Endst: of even No & date.

Copy forwarded for information to the P.S to Secretary Information & PRs Department for information.

DDcLits
For ml - PL

8/1/2020
Section Officer (Establishment)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 629/2019

Sabirullah s/o Baqi Khan

Senior Scale Stenographer, Directorate General Information & PRs

Khyber Pakhtunkhwa, Peshawar.....**APPELLANT**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar
2. The Secretary Information & PRs Department, Govt. of Khyber Pakhtunkhwa, Civil Secretariat Peshawar
3. Secretary Finance Department, Govt. of Khyber Pakhtunkhwa, Civil Secretariat Peshawar
4. Secretary Establishment Department, Govt. of Khyber Pakhtunkhwa, Civil Secretariat Peshawar

.....**Respondents**

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO 1 TO 4

PRELIMINARY OBJECTIONS:

1. That the appellant has not come to this Tribunal with clean hand.
2. That the appellant have no locus standi to file this Appeal.
3. That the appellant has estopped by his own conduct to file this Appeal.
4. That the appellant's claim is based on mis-statement, therefore, his Appeal is liable to be dismissed.

RESPECTFULLY SHEWETH

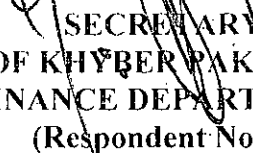
REPLY ON FACTS:


1. Correct, pertain to service record.
2. The criteria mentioned in the old service rules vide notification dated 18th August, 2011 was not based on total strength of the Assistants (BPS-16) and Senior Scale Stenographers (BPS-16). Besides, the benefit of counting of service in lower scale was not extended to the Assistant cader in the old service rules (*Annex-I*).
3. Incorrect, hence denied. The fact is that as per previous service rules at *Annex-I*, an official who according to seniority has to be promoted to the post of Admn. Officer / Superintendent (BS-17) was required to have 05 years service as Assistant (BPS-16) whereas the Senior Scale Stenographers (BPS-16) was benefited excessively for counting of length of service rendered in lower scale.
4. Denied as laid. The fact is that upon script of the Departmental Appeal of the petitioner, the same was processed as per rules, however, since the same was not based on rationale as the quota of 60/40 already awarded to Assistant cader and Senior Scale Stenographers cader was also not based on their cadre strength i.e. Assistants are 27 and Senior Scale Stenographers are 3 in number. Hence the Appeal was regretted by the competent authority.

ON GROUNDS:

- A. Incorrect. hence denied. Detailed elucidation has already been given in Para-3 and 4 of the "Facts" above.
- B. Denied as laid. Facts have already been elaborated in Para-3 and 4 above.
- C. Incorrect, hence denied. The petitioner has attempted to manipulate record and misled the Hon'ble Court. The fact is that only 03 Nos. of Senior Scale Stenographer posts in BPS-16 remain occupied at present, whereas the number of Assistants (BS-16) is 27. At this point, attention is invited to the fact that the Senior Scale Stenographer, have even been favored in allocation of promotion quota. Since the same would have even lessen, had the ratio been fixed on the basis of 03 : 27.
- D. Incorrect hence denied. The petitioner has wrongly referred and compared rules of the Establishment Department which too are based on the strength of the cadres for promotion to Provincial Management Service (PMS). The amendment in service rules has not been made illegally rather quota has been rationalized. The Stenographer cader was enjoying 40% quota for promotion, over and above their cader strength i.e. 03 as compared to 27 Assistants under the old service rules at Annex-I, which was accordingly balanced through amendments in the service rules. Moreover no similar provision of counting of service of lower scale, was available to the Assistant cader as compared to the Senior Scale Stenographers which was a disparity and was accordingly removed from service rules for the post of Admin Officer / Superintendents (BPS-17).
- E. Incorrect hence denied. The retaining of 5 years length of service for Assistants as well as Senior Scale Stenographers (BPS-16) is in accordance with the laid down criteria in vogue in other Departments too and no illegality has been done.
- F. Incorrect hence denied. As explained above in Para-D.
- G. No comments as both the posts cannot be compared.
- H. No comments.

It is therefore, prayed before this Hon'ble Tribunal to dismiss the instant appeal of the appellant with costs being devoid of merit and his demand is against the norms of justice.


SECRETARY
GOVT. OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(Respondent No. 3)


SECRETARY
GOVT. OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(Respondent No. 4)
SECRETARY ESTABLISHMENT
Establishment & Administration
Department.


SECRETARY
INFORMATION & PRS DEPARTMENT
GOVT. OF KHYBER PAKHTUNKHWA
Information & PRS Department
(on behalf of Respondents No. 1 & 2)
Government of Khyber Pakhtunkhwa

Vetted/ approved copy

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(B)

(3)

GOVERNMENT OF KHYBER PAKHTUNKHWA, INFORMATION, PUBLIC RELATIONS AND CULTURE DEPARTMENT

NOTIFICATION

o/c

ANNEX-B

Peshawar Dated the 18th August, 2011.

No. SO(INF)11(34)S.Rules/2011 Vol.V. In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous rules issued in this behalf, the Information Public Relations and Culture Department, in consultation with the Establishment Department and Finance Department hereby lays down the method of recruitment, qualifications and other conditions, specified in Columns 3 to 5 of the Appendix to this notification which shall be applicable to various posts in the Directorate of Information, Khyber Pakhtunkhwa as specified in column 2 of the said appendix.

APPENDIX

S.N	Nomenclature of Post.	Minimum qualification prescribed for appointment by initial recruitment.	Age Limit	Method of recruitment
0	Director of Information (BS-19)			By Promotion on the basis of seniority-cum-fitness, from amongst the Deputy Director Information, Public Relations Officer to Governor and Station Directors with twelve years service in BPS-17 and above.

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2	Deputy Director Information/Public Relations Office to Governor/Station Director (BPS-18)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors/Information, Information Officers and Producers with five years service as such.
3	Assistant Director Information/Information Officer (BPS-17) <i>Station Manager Assistant Registrar</i>	(i) At least Second Class Master's Degree in Journalism or Mass-Communication from a recognized University, and (ii) two years practical experience in the relevant field	21 to 32 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Assistant-Information Officers with five years services as such; and (b) fifty per cent by initial recruitment.
4	Producer (BPS-17)	At least Second Class Master's Degree in Journalism or Mass-Communication from a recognized University with two years experience in radio programming and production.	21 to 32 years	By initial recruitment.
6	Budget and Account Officer (BPS-17) Assistant Director Programmer (BPS-17)	At least Second Class Master's Degree in Computer Science or Information Technology or equivalent qualification from a recognized University.	21 to 32 years	By transfer on deputation from the office of Accountant General, Khyber Pakhtunkhwa. By initial recruitment.

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Transmission Engineer (BPS-17)	<p>(i) At least Second Class Master's Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University with one year experience in radio transmission; or</p> <p>(ii) at least Second Class Bachelor's Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University with two years experience in radio transmission.</p>	21 to 32 years.	By initial recruitment.
8. Assistant Information Officer (BPS-16)	<p>(i) At least Second Class Bachelor's Degree from a recognized University, with Journalism as one of the subject; or</p> <p>(ii) at least Second Class Bachelor's Degree from a recognized University with two years practical experience in Journalism.</p>	21 to 30 years.	<p>(i) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Article Writers with four years service as such; and</p> <p>(ii) seventy-five per cent by initial recruitment.</p>

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9	Administrative Officer/ Superintendent (BPS-16)			<p>By promotion, on the basis of seniority-cum-fitness, in the following manner amongst-</p> <ul style="list-style-type: none"> (a) sixty per cent from amongst the Assistants with five years service as such; and (b) forty per cent from amongst the Senior Scale Stenographers with five years service as such or ten years total service as a Senior Scale Stenographer and Stenographer (English/Urdu). <p>Note: For the purpose of promotion, separate seniority list of the Assistants and the Senior Scale Stenographers shall be maintained on the basis of their continuous appointment to the respective posts.</p>
10	Film Production Officer (BPS-16)			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Cameramen with seven years service as such.</p>
11	Pictorial Publicity Officer (BPS-16)			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Photographer-cum-Cameramen with at least five years service as such.</p>

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12	Junior Transmission Engineer (BPS-16)	(i) At least Second Class Bachelor's Degree in Electronics or Electrical Engineering (Telecommunication) from a recognized University; or (ii) Diploma of Associate Engineering with one year experience in Radio transmission.	21 to 32 years.	By initial recruitment.
13	News Editor (BPS-16)	(i) At least Second Class Bachelor's Degree from a recognized University; and (ii) two years experience of audio editing in Radio. <u>Note:</u> Preference will be given to those having command on Pashto and Urdu Languages and computer literate.	21 to 32 years.	By initial recruitment.

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14	Audio Editor (BPS-16)	<p>(i) At least Second Class Bachelor's Degree from a recognized University;</p> <p>(ii) two years experience in audio editing, and</p> <p>(iii) one year experience in adobe Audition</p> <p>Note: Preference will be given to Information Technology certificate or diploma holder.</p>	21 to 32 years.	By initial recruitment
15	Senior Scale Stenographer (BPS-15)			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers English/Urdu with five years service as such.</p> <p>Note: A joint seniority list of Stenographers (English/Urdu) shall be maintained.</p>
16	Assistant (BPS-14)	At least Second Class Bachelor's Degree from a recognized University.	20 to 30 years.	<p>(a) Sixty-seven per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with at least three years service as such; and</p> <p>(b) thirty-three per cent by initial recruitment.</p>

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	Non-Linear Editor (BPS-14)	(i) At least Second Class Bachelor's Degree from a recognized University; (ii) one year Diploma in Information Technology from a recognized Technical Board; and (iii) three years experience in Non-Linear Editor and Video Composition.	21 to 32 years.	By initial recruitment.
18.	Cameraman (BPS-13)	(i) Intermediate Certificate from a recognized Board; and (ii) three years experience in out door cinematography and full knowledge of technical processing of documentary and news reel films.	21 to 30 years.	By initial recruitment.
19.	Stenographer (English/Urdu) (BPS-12)	(i) Intermediate or equivalent qualification from a recognized Board.	18 to 30 years.	By initial recruitment.

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20.	Article Writer	(i)	At least Second Class Bachelor's Degree from a recognized University, and one year Diploma in Information Technology from Board of Technical Education or its equivalent.	20 to 30 years	By Initial recruitment.
21.	Article Writer (BPS-11)	(i)	At least Second Class Bachelor's Degree in Journalism as one of the subject from a recognized University, and	20 to 30 years	(a) Fifty per cent by promotion, on the basis of seniority cum fitness, from amongst the translators with at least three years service as such and (b) Fifty per cent by initial recruitment.
		(ii)	speed of fifty words per minute in English/Urdu shorthand and thirty-five words per minute in English/Urdu typing speed, and		
		(iii)	MS Word & MS Excel for English and Image for Urdu Stereographer		
		(ii)	one year practical experience of writing press articles and doing translation work.		

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22.	Photographer-cum-Cameraman (BPS-11)	Intermediate with three years experience of still working in computer Photoshop program and video photography with an established Agency.	18 to 30 years.	(a) Seventy per cent by promotion, on the basis of seniority-cum-fitness, from amongst Dark Room Attendants with three years service as such; and (b) thirty per cent by initial recruitment.
23.	Telecom Electric Technician (BPS-11)	Three years Diploma in Electrical Engineering from a recognized Institute or Technical Board. Note: Preference will be given to Information Technology literate.	18 to 30 years.	By initial recruitment.
24.	Senior Clerk (BPS-09)			By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks with atleast two years service as such.
25.	Operator (BPS-08)	Intermediate with two year experience of operating video audio equipment.	20 to 35 years.	By initial recruitment.
26.	Junior Clerk (BPS-07)	(i) Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) a speed of thirty words per minute in typing.	18 to 30 years.	(a) Thirty-three per cent by promotion, from amongst the Daftraries having Secondary School Certificate with two years service as such; and (b) sixty-seven per cent by initial recruitment.

Telephone Operator (BPS-07)	Intermediate or equivalent qualification from a recognized Board.	18 to 30 years.	By initial recruitment.
Translator, (BPS-06)	(i) Intermediate from a recognized Board, and (ii) ability to translate from English to Urdu and vice versa.	18 to 30 years.	By initial recruitment.
Dark Room Attendant (BPS-05)	(i) Secondary School Certificate from a recognized Board, and (ii) two years practical experience of working in computer PhotoShop program and video operating camera in some renowned Photo Studio, Newspapers or a Government Organization.	18 to 30 years.	By initial recruitment.
Driver (BPS-04)	Literate having valid driving licence.	18 to 35 years.	By initial recruitment.

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32	Lightman (BPS-03)	Middle School Certificate with good knowledge making electric connections and throwing of light camera man.	18 to 35 years.	By initial recruitment.	<p>(18)</p> <p>By promotion on the basis of seniority cum fitness from amongst Naib Qasids, Cleaners, Chowkidars, Dak Runners, Dispatch Riders, Mails, Camera Cobles or Sweepers who have passed Secondary School Examination with three years service as such.</p>
33	Dakhti (BPS-02)	Literate.	18 to 35 years.	By initial recruitment.	
34	Naib Qasid (BPS-01)	Literate.	18 to 35 years.	By initial recruitment.	
35	Cleaner (BPS-01)	Literate having valid LTV licence.	18 to 35 years.	By initial recruitment.	
36	Dispatch Rider (BPS-01)	Literate having valid LTV licence.	18 to 35 years.	By initial recruitment.	
37	Mali (BPS-01)	Literate having experience in gardening.	18 to 40 years.	By initial recruitment.	
38	Chowkidar (BPS-01)	Literate.	18 to 40 years.	By initial recruitment.	

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	Literate	18 to 40 years	By initial recruitment
39 Sweepers (BPS-01)	Literate	18 to 35 years	By initial recruitment
40 Camera Coolie (BPS-1)	Literate		

SECRETARY TO GOVERNMENT OF THE KHAYSER PAKHTUNKHWA
 INFORMATION PUBLIC RELATIONS AND CULTURE DEPARTMENT

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

IN RE APPEAL NO. 629/2019

Sabirullah Appellant

Versus

Govt Of KPK & others(Respondents)

REJOINDER ON BEHALF OF APPELLANT

RESPECTFULLY SHEWETH,

Rejoinder on behalf of appellant is as under: -

Reply to the preliminary objections: -

All the preliminary Objections have been taken in routine, the appellant has come to this Hon'ble Court with clean hands and is having locus standi to file the instant appeal. The Respondents had not shown anything which would estopped the appellant from filing of the Appeal. The Appeal is based on true statement and is liable to be accepted.

REPLY TO FACTS: -

1. Para No 1 needs no Reply.
2. Para No 2 of the comments is wrong and incorrect, the old service Rules were based on the total strength of Assistant BPS-16 and Senior Scale Stenographer BPS-16. Both were and are having separate Seniority List.

A. Ground A of the comments is wrong and incorrect and the facts narrated in ground A are reiterated.

B. Ground B of the comments is wrong and incorrect and the facts narrated in ground B are reiterated.

C. Ground C of the comments is wrong and incorrect the appellant has never manipulated the record. The Senior Scale Stenographer has not been favoured in allocation of promotion Quota.

D. Ground C of the comments is wrong and incorrect. While making amendment 5 years Service as Senior Scale Stenographer has wrongly been inserted in the Rules, because when Junior Scale Stenographer BPS-14 is

REPLY TO GROUNDS:

4. Para no 4 is wrong and incorrect, the department has discriminated the Senior Scale Stenographer. Through the impugned Rules the chances of the Senior Scale Stenographer has become very low.

3. Para No. 3 of the Comments is wrong and incorrect and the facts narrated para 3 of the appeal is reiterated. It is further submitted that no extra benefit was given to Senior Scale Stenographer rather they suffered because Senior Scale Stenographer has to serve the Department over and above 30 years when he will get promotion. Like the case of the appellant that he served the Department for 30 years and now he has been promoted to Senior Scale Stenographer BPS-16. Usually most of the Junior Scale Stenographer get retirement in the same scale and they are not promoted to senior scale stenographer.


promoted as Senior Scale Stenographer BPS-16 he has served the Department for 30 years like in ^{the} case of the Appellant. But on the other side Assistants get rapid promotion due to leniency in the Rules.

- E. Ground E of the comments is wrong and incorrect and the facts narrated in ground E are reiterated.
- F. Ground F of the comments is wrong and incorrect and the facts narrated in ground F are reiterated.
- G. Ground G of the comments is wrong and incorrect and the facts narrated in ground G are reiterated.
- H. Ground H of the comments is wrong and incorrect and the facts narrated in ground H are reiterated.

It is, therefore, humbly prayed that on acceptance this rejoinder and Appeal the Instant Appeal may kindly be allowed in favour of Appellant and against respondents: -


Appellant

Through


NASIR MAHMOOD
Advocate, Supreme Court
Of Pakistan

Dated: - 07.09.2020

AFFIDAVIT

It is solemnly affirm and declare on Oath that all the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.


DEPONENT

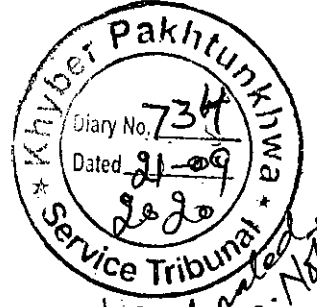


BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

CM No. ____/2020

In

Service Appeal No. 629/2020



*Be fixed before
DB on the accelerated
date i.e 30/9/2020. Notta*

[Signature]
22/9

Sabir Ullah..... Appellant

VERSUS

Govt of KP & others..... Respondents

*put up to the court with
relevant appraisals*

[Signature]
21/9/2020

APPLICATION FOR RESTRAINING
THE RESPONDENTS FOR MAKING
PROMOTION TO THE POST OF
SUPERINTENDENT BPS-17

Respectfully Sheweth:-

1. That the above titled Service Appeal is pending adjudication before this hon'ble Tribunal, which is fixed for 17/11/2020.

2. That the Appellant has challenged the amendment in the service rules for promotion to the post of administrative Officer / Superintendent BPS-17.
3. That through the new amended rules promotion for the post of Administrative Officer / Superintendent has been increased for assistance and the court of Appellant cadre i.e Stenographer has been decreased, which was challenged by the appellant before this Hon'ble Tribunal.

4. That now the Respondents through the new Amended Rules are going to make promotion in few days and if the promotions have been made, then the appellant would suffer irreparable loss, beside the appellant having prima facie case and balance of convenience tilts in favour of the appellant.

It is, therefore, respectfully prayed that On acceptance of this Application, the relief as prayed for in the heading of the application may please be granted to the Appellant.

Any other relief deemed proper and fit in the circumstances of the case may also very graciously be granted to the appellant.



Appellant

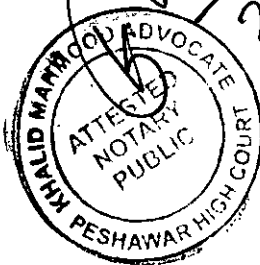
Through:

NASIR MAHMOOD

Advocate, Supreme Court
Of Pakistan

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that the contents of the Instant **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

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



*Put up to the court with
relevant appeal,*

**Sabir Ullah
VERSUS
Govt of KPK and others**

**APPLICATION FOR EARLY
HEARING OF THE CAPTIONED
CASE**

*Be accelerated
to 30/9/2020. Notice.*

22/9/20

Respectfully Sheweth:

1. That the above titled case is pending adjudication before this Honourable Court and is fixed for 17.11.2020.
2. That the Respondents are going to make promotion to the post of Administrative Officer / Superintendent in the coming week, therefore the issue being a urgent nature, the case may kindly be accelerated and fixed it as earlier as possible.

It is, therefore, most humbly prayed that on acceptance of this application, the above titled case may kindly be fixed an early date of hearing.

Sabir
Applicant

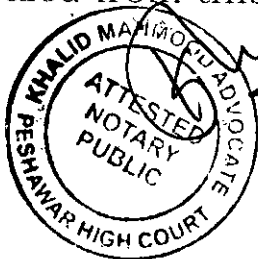
Through

Nasir Mahmood
Nasir Mahmood
Advocate, Supreme Court
Pakistan

Date: 21.09.2020

AFFIDAVIT

It is solemnly affirm and declare on oath that the contents of the Instant **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



21-9-20

Sabir
DEPONENT