


FORM OF ORDER SHEET

Court of _____

Appeal No. 1365/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/06/2023	<p>The appeal of Mr. Shakeel Ahmad presented today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 1365 /2023

Shakel Ahmad

versus


Director General & Others

I N D E X

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Appellant

Through


(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

Dated 17-06-2023

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No 1365 /2023

Shakel Ahmad S/O Khurshid Ali,
R/O Buner, Assistant Director,
Provincial Headquarter, Govt. of
KP, Sports, Tourism, Archeology,
Museum of Youth Affairs Department,
Peshawar, Presently serving Regional
Sports Officer Malakand at Swat Appellant

VERSUS

1. Director General, Sports, KP
Peshawar.
2. Chief Secretary, Govt. of KP,
Peshawar.
3. Secretary Sports, KP,
Peshawar.
4. Deputy Director, Sports,
KP, Peshawar.
5. Muhammad Ismail Khan,
District Sports Officer,
Lakki Marwat.
6. Tariq Muhammad, District
Sports Officer, Swabi.
7. Asad Khan, Assistant Director,
Peshawar Sports Complex.

8. Ahmad Zaman, District Sports Officer, Manshera.
9. Munir Abbas, District Sports Officer, Peshawar Sports Complex.
10. Kashif Farhan, Assistant Director, Peshawar Sports Complex.
11. Hazrat Ullah, District Sports Officer, Hangu.
12. Gul Rukh Gulfam, Assistant Director, District Sports Office, Peshawar Sports Complex Respondents

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974
AGAINST THE FINAL SENIORITY LIST OF ASSISTANT
DIRECTOR, DISTRICT SPORTS OFFICER AND
ADMINISTRATOR BPS-17 STOOD ON 18-01-2023
ISSUED VIDE COVERING LETTER DATED 27-01-2023
AND AGAINST NOT TAKING ACTION ON THE
REPRESENTATION DATED 17-03-2023.**

Respectfully Sheweth:

1. That appellant was initially inducted in the department in the year 2008 and lastly promoted to the post of Assistant Director from the post of Budget and Account Officer B-16 through DPC/PSB on 28-05-2019.
2. That department maintain combine seniority list of Assistant Director, District Sports Officer and Administrators B-17 according to the rules of 2019 as all these posts having same cadre in the department. (Copy as annex "A")

3. That the department issued Tentative Seniority List for the year 2021 stand on 15-09-2021, issued vide covering letter dated 15-09-2021 inviting objections from the concerned officials within 15 days positively. Here it is to be pointed out that officials from S. No. 09 to 16 who were not regularly promoted through DPC but only upgraded were placed senior to appellant whereas appellant was placed at S. No. 19 of the seniority list in violation of law and as he was regularly promoted through DPC/PSB. (Copy as annex "B")
4. That appellant preferred objection on proforma to the respondents on the ground that the official from S. No. 09 to 16 has not been promoted to the post of District Sports Officer B-17 on the recommendation of DPC but upgradation of the post that too only post is upgraded, and the post was not upgraded along with incumbents but in vain. (Copy as Annex "C")
5. That on 16-08-2022, the same Tentative Seniority List which was issued on 15-09-2021 was again issued vide covering letter dated 16-08-2022 on which the appellant filed objection on 29-08-2022 but in vain / not responded / not considered. (Copies as annex "D" & "E")
6. That on 27-01-2023, the department issued Final Seniority List stood on 18-01-2023 but without circulating the same among the concerned officials and was kept in dark from the appellant and other officials, the same Seniority List was got from the office on 08-03-2023, here it is to be noted that in the seniority list R. No. 05 to 12 who were only upgraded and not regularly promoted was made senior to appellant whereas appellant who was regularly promoted as Assistant Director on the recommendation of DPC / PSB in the year 2019 he was placed at S. No. 17, against the law and rules and thereafter the appellant preferred departmental appeal to R. No. 02 on 17-03-2023 which is not responded with in the statutory period of three months. (Copies as annex "F" & "G")

Hence this appeal, inter alia, on the following grounds:-

GROUNDS:

- a. That R. No. 05 to 12 has not been regularly promoted and only upgraded so has no right of seniority over the appellant who is regularly promoted on the recommendation of DPC / PSB to the post, post / cadre of Assistant Director BPS-17.
- b. That upgradation of a post is only meant for monetary benefits having no right of seniority over the officials who are regularly promoted
- c. That appellant has every right to be placed above R. No. 05-12 on the basis of regular promotion to the post / cadre of Assistant Director BPS-17.
- d. That the department / official respondents are legally bound to draw seniority list according to law and rules on the subject.
- e. That by drawing wrong seniority list of the incumbents of the department the respondents are trying to deprive the appellant from further promotion which is right of the appellant according to law and rules on the subject.
- f. That charge on the upgraded post does not give right of seniority over the incumbents who are regularly promoted on the recommendation of PSB / DPC.
- g. That the rules provides for promotion and not upgradation to the promotion post / vacancy. So upgradation in no way give right of seniority to the particular incumbents who are only upgraded.
- h. That the superior courts has drawn distinction between promotion and upgradation in many many judgment clarifying the position.

It is, therefore, most humbly prayed that on acceptance of the appeal, seniority list stood on 18-01-2023 issued vide covering letter dated 27-01-2023 be modified to the extent that R. No. 05 to 12 be excluded from the same and appellant be placed at S. No. 09 above the name of Hamid Ali and below the name of Amjid Iqbal with all back / service / consequential benefits in the interest of justice.

[Handwritten Signature]

Appellant

Through

[Handwritten Signature]

Saadullah Khan Marwat.

[Handwritten Signature]
Arbab Saiful Kamal

[Handwritten Signature]
Amjad Nawaz
Advocates.

Dated 17-06-2023

AFFIDAVIT

I, Shakeel Ahmad S/O Khurshid Ali, (Appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief.

[Handwritten Signature]
16-6-23
[Handwritten Signature]
DEPONENT

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

[Handwritten Signature]
ADVOCATE

Rules

A



GOVERNMENT OF KHYBER PAKHTUNKHWA,
SPORTS, TOURISM, ARCHAEOLOGY, MUSEUMS & YOUTH AFFAIRS DEPARTMENT.

Page 1 of 12

Dated Peshawar, the 29/04/2019

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NOTIFICATION

No.SO(Sports)1-8/2019/S.Rules :- 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 all previous Notifications issued in this behalf, the Sports, Culture, Tourism, Youth Affairs, Archaeology and Museums Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in Column Nos. 3 to 5 of the Appendix to this Notification, which shall be applicable to the posts in the Directorate General of Sports, as specified in Column No. 2 of the said Appendix:

APPENDIX

S.No.	Nomenclature of post.	— Minimum qualification for appointment by Initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Director General (BPS-20).		-	By promotion, on the basis of seniority-cum-fitness, from amongst the Directors (BPS-19), having two (2) years' service in BPS-19 and seventeen (17) years service in BPS-17 and above. Provided that if no suitable officer is available for promotion then by transfer from amongst the PAS/PMS/PCS officers.

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29.04.2019
S. H. HANDEL

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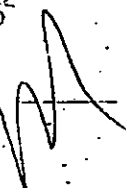
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2.	Director (BPS-19).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors (BPS-18) and Regional Sports Officers (BPS-18) having seven(07) years' service as such or twelve(12) years' service in BPS-17 and above.</p> <p>Note: For the purpose of promotion, a joint seniority list of Deputy Directors and Regional Sports Officers shall be maintained.</p>
3.	Deputy Director / Regional Sports Officer (BPS-18).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst Assistant Directors (BPS-17), District Sports Officers (BPS-17) and Administrators (BPS-17), having five years' service as such.</p> <p>Note: For the purpose of promotion, a joint seniority list of the Assistant Directors, District Sports Officers and Administrators shall be maintained.</p>
4.	Chief Coach (BPS-18).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Coaches (BPS-17), having five years service as such.</p>
5.	Assistant Director (BPS-17).	<p>At least Second Class Master's Degree or B.S.(4 years) in Social Sciences, Management Science, Sports Sciences or its equivalent qualification from a recognized University.</p>	<p>22 to 35 years.</p>	<p>(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents (BPS-17), with two years service as such;</p> <p>(b) ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Budget and Accounts Officers (BPS-16), with two years service as such; and</p> <p>(c) fifty per cent by initial recruitment.</p>

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6.	District Sports Officer (BPS-17).	At least Second Class Master's Degree or BS (4 years) in Social Sciences, Management Science; Sports Sciences or its equivalent qualification from a recognized University.	22 to 35 years.	By initial recruitment.
7.	Administrator (BPS-17).	At least Second Class Master's Degree or BS (04 years) in Business Administration, Public Administration, Sports Sciences or its equivalent qualification from a recognized University.	22 to 35 years.	(a) Ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Manager-cum-Groundmen (BPS-16), with five years service as such; and (b) ninety per cent by initial recruitment.
8.	Senior Coaches (BPS-17).	<p>At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with five (5) years' experience as Coach in the relevant games before or after Graduation as recognized by the Directorate General of Sports with-</p> <p>(a) at least second position in the relevant individual sports event as a player at the National level, organized by Pakistan Olympic Association, Pakistan Sports Federation concerned or Pakistan Sports Board; or</p> <p>(b) participation as a team member as a playing player in the relevant National level sports competition, organized by Pakistan Olympic Association, Pakistan Sports Federation concerned or Pakistan Sports Board and team secured at least Second position.</p> <p>Note: Preference shall be given to International sports person in the relevant field.</p>	22 to 40 years.	(a) Seventy per cent by promotion, on the basis of seniority-cum-fitness, from amongst Coaches (BPS-16) with at least three years service as such; and (b) thirty per cent by initial recruitment.

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9.	Doctor (BPS-17).			By transfer of a suitable Doctor from the Health Department of Government.
10.	Physiotherapist (BPS-17).			By transfer of a suitable Physiotherapist from the Health Department of Government.
11.	Superintendent (BPS-17).			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants (BPS-16) and Senior Scale Stenographers (BPS-16), with five years service as such:</p> <p>Provided that if no suitable official is available for promotion then by transfer from any Government Department.</p> <p>Note: For the purpose of promotion, a joint seniority list of Assistants and Senior Scale Stenographers shall be maintained.</p>
12.	Coaches (BPS-16).	<p>At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with two (2) years' experience as Coach in the relevant games before or after Graduation as recognized by the Directorate General of Sports.</p> <p>(a) at least second position in the relevant individual sports event as a player at the National level, organized by Pakistan Olympic Association or Pakistan Sports Federation; or</p> <p>(b) participation as a team member or a playing player in the relevant National level sports competition.</p>	20 to 40 years.	<p>(a) Sixty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Junior Squash Coaches (BPS-10) and Junior Coaches (BPS-10) with at least two years services as such; and</p> <p>(b) forty per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, a joint seniority list of Junior Squash Coaches and Junior Coaches shall be maintained.</p>

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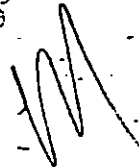
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		organized by Pakistan Olympic Association or Pakistan Sports Federation and team secured at least second position. Note: Preference shall be given to International sports person in the relevant field.		
13.	Manager-cum-Ground man (BPS-16).	(a) At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with participation in any National level Cricket tournament as a playing player and having at least three years experience in office management or administration; or (b) at least Second Class Bachelor's Degree or its equivalent qualification from a recognized University with Diploma in Physical Education and participation in the Inter University or Inter Board competitions as a Cricket player.	20 to 32 years.	(a) Twenty-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Supervisors (BPS-15) with five years' service as such; and (b) seventy-five per cent by initial recruitment.
14.	Budget and Accounts Officer (BPS-16).	At least Second Class Master's Degree or BS (04 years) in Business Administration (Finance), Commerce (Accounts) or its equivalent qualification, from a recognized University.	22 to 32 years.	By initial recruitment.

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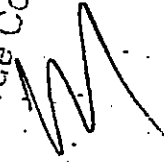


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15.	Senior Scale Stenographer (BPS-16).		20 to 32 years.	<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers (BPS-14) with at least five years' service as such:</p> <p>Provided that if no suitable person is available for promotion then by transfer from any Government Department.</p>
16.	Assistant (BPS-16).	At least Second Class Bachelor's Degree or its equivalent qualification from a recognized University.	18 to 30 years.	<p>(a) Seventy-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks (BPS-14) with at least five years' service as Junior Clerk and Senior Clerk; and</p> <p>(b) Twenty-five per cent by initial recruitment.</p>
17.	Computer Operator (BPS-16).	<p>(a) At least Second Class Bachelor's Degree in Computer Science/Information Technology (BCS/BIT four years) or its equivalent qualification, from a recognized University; or</p> <p>(b) at least Second Class Bachelor's Degree or its equivalent qualification, from a recognized University with one year Diploma in Information Technology or its equivalent qualification, from a recognized Board of Technical Education.</p>	18 to 28 years.	<p>By initial recruitment.</p>

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18.	Supervisor (BPS-15).	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with Junior Diploma in Physical Education.	20 to 32 years.	(a) Ten per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Hosiel Superintendents (BPS-10) with three (03) years service as such; and (b) ninety per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Caretakers (BPS-08) and Store Keepers (BPS-08) with two (02) years service as such. Note: For the purpose of promotion, a joint seniority list of Care Takers and Store Keepers shall be maintained.
19.	Stenographer (BPS-14).	(a) At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with- (b) speed of fifty (50) words per minute in shorthand in English and thirty-five (35) words per minute in typing; and (c) knowledge of Computer in using MS Word and MS Excel.	18 to 30 years.	By initial recruitment.
20.	Senior Clerk (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks (BPS-11) with at least two years service as such.
21.	Junior Clerk (BPS-11).	At least Second Division Intermediate Certificate or its equivalent qualification from a recognized Board with a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids (BPS-05), Chowkidars (BPS-05), Security Guards (BPS-05), Watchmen (BPS-05), Malies (BPS-05), Ground-men (BPS-05), Cleaners (BPS-05), Conductors (BPS-05), including holders of other equivalent posts in the Directorate General of Sports

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				<p>having at least two years' service as such, who have passed Intermediate Examination; and</p> <p>(b) sixty-seven per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, a joint seniority list of Naib Qasids, Chowkidars, Security Guards, Watchmen, Malies, Ground-men, Cleaners, Conductors, including holders of other equivalent posts in the Directorate General of Sports shall be maintained.</p> <p>Provided that if two or more officials have acquired the Intermediate Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post and where a senior official does not possess the requisite qualification at the time of filling of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p> <p>Provided further that where a senior official does not possess the requisite qualification at the time of filling of a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>
22.	Junior Squash Coach/Junior Coach (BPS-10).	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board, with three (3) years' experience as Coach in the relevant games before or after Secondary School Certificate; and	25 to 40 years.	By initial recruitment.

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		<p>(a) first or second position in the relevant individual sports event as a player at the National level organized by Pakistan Olympic Association or Pakistan Sports Federation; or</p> <p>(b) participation as a player in the relevant National level sports competition organized by Pakistan Olympic Association or Pakistan Sports Federation and the team secured at least second position.</p> <p>Note: Preference shall be given to International sports persons in the relevant field.</p>		
23.	Hostel Superintendent (BPS-10)	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years' experience in the relevant field.	18 to 30 years.	By initial recruitment.
24.	Care Taker / Store Keeper (BPS-08)	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board.	25 to 35 years.	(a) Twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Tube Well Operators (BPS-05), Wood Workers (BPS-05), Electrician (BPS-05) and Plumber (BPS-05) with three (03) years' service as such:

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				<p>(b) fifty per cent by promotion, on the basis of seniority-cum-fitness; from amongst Electricians (BPS-03), Plumbers (BPS-03), Tube-Well Operators (BPS-03) and Generator Operators (BPS-03); with three years' service as such; and</p> <p>(c) thirty per cent by initial recruitment.</p> <p>Note: For the purpose of promotion, joint seniority lists of Tube Well Operators (BPS-05), Wood Workers (BPS-05), Electricians (BPS-05) and Plumbers (BPS-05), and Electrician (BPS-03), Plumber (BPS-03), Tube-Well Operator (BPS-03) and Generator Operators (BPS-03), shall respectively be maintained.</p>
25.	Driver (BPS-6).	<p>Literate having valid Light Transport Vehicle driving license issued by the competent authority:</p> <p>Provided that preference shall be given to those who have vast experience in driving, repair and maintenance of vehicles.</p>	18 to 40 years.	By initial recruitment.
26.	Tube Well Operator/ Wood Worker/ Electrician (BPS-5).	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with at least five years practical experience in the relevant field.	18 to 40 years.	By initial recruitment.

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27.	Life Guard (BPS-04).	At least Second Division Secondary School Certificate or its equivalent qualification from a recognized Board with participation in at least at the District level swimming competitions.	18 to 40 years.	By initial recruitment.
28.	Electrician / Plumber / Generator Operator (BPS-03).	Certificate from a recognized technical institution in the relevant field with two years practical experience.	18 to 40 years.	By initial recruitment.
29.	Tube Well Operator (BPS-03).	At least Middle passed from a recognized Board.	18 to 40 years.	By initial recruitment.
30.	Naib Qasid (BPS-03).	Preferably literate.	18 to 40 years.	By initial recruitment.
31.	Chowkidar/Security Guard/ Watchman/ Cleaner (BPS-03).	Literate with sound physique, having two years relevant experience.	18 to 40 years.	By initial recruitment.
32.	Mali / Ground-man (BPS-3).	Literate with two years relevant working experience.	18 to 40 years.	By initial recruitment.

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33.	Conductor (BPS-03).	Preferably literate.	18 to 40 years.	By initial recruitment.
34.	Sweeper (BPS-03).	Literate.	18 to 40 years.	By initial recruitment.

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sd/x
 Secretary to Government of Khyber Pakhtunkhwa
 Sports, Tourism, Archaeology, Museums &
 Youth Affairs Department

Endst: No. No.SO(Sports)I-8/2019/S.Rules:

Dated Peshawar, the 29/04/2019

Copy forwarded to the:-

- 1) All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
- 2) Secretary to Governor-Khyber Pakhtunkhwa.
- 3) Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
- 4) Accountant General Khyber Pakhtunkhwa.
- 5) Director General Sports, Khyber Pakhtunkhwa Peshawar.
- 6) Secretary Public Service Commission Khyber Pakhtunkhwa Peshawar.
- 7) Registrar Peshawar High Court / Service Tribunal Peshawar.
- 8) All Regional Sports Officers / District Sports Officers, Khyber Pakhtunkhwa.
- 9) Manager Government Stationary & Printing Department.
- 10) PS to Chief Secretary Khyber Pakhtunkhwa Province.
- 11) PS to Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 12) PA to Additional Secretary Sports Department Khyber Pakhtunkhwa Peshawar.
- 13) Office Order File.

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Sajid Nawaz
 29-04-2019
 (Sajid Nawaz)
 Section Officer Sports

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Sports are essential for the development of a happy, healthy & vigorous society.

DIRECTORATE GENERAL OF SPORTS

KHYBER PAKHTUNKHWA
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph: # 9212767, Fax # 9212766

No. 17/Seniority List/2021

Dated 15-09-2021

To,

- 1- All Regional Sports Offices in Khyber Pakhtunkhwa
- 2- All Assistant Directors o/o DG Sports Khyber Pakhtunkhwa.
- 3- Assistant Director o/o Director Sports (merged areas).
- 4- All District Sports Officers in Khyber Pakhtunkhwa.
- 5- All Administrators o/o DG Sports Khyber Pakhtunkhwa.

Subject: TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA FOR THE YEAR 2021.

Kindly refer to the subject noted above and to forward herewith a copy of Tentative Seniority list of Assistant Directors, Administrators and District Sports Officers (BPS-17) of the Directorate General of Sports Khyber Pakhtunkhwa for the year 2021 along with certificate proforma for perusal and intimation of objection / observation, if any. The tentative seniority list issued in pursuance of the Sports Department Notification No. SO(Sports)1-41/2020/2912-16, dated 10th September 2021.


2. Incorrect entry in service particulars or objection / observations on the list may be furnished on the enclosed proforma supported by attested photocopies of relevant documents within 15 days positively, otherwise, it will be presumed that entries made in the list are correct.

Encl: As above.

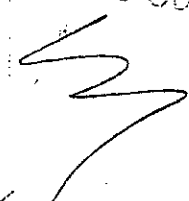

DIRECTOR GENERAL

Copy forwarded to the: -

- 1- Secretary to Govt of Khyber Pakhtunkhwa, Sports and Youth Affairs Department.
- 2- Director Sports (merged areas), Peshawar.


DIRECTOR GENERAL

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TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA (AS STOOD ON 15-09-2021).

S.#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 st Entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
1)	Mst Nazia Zekki	M.A.	05-06-1986	Korram	09-09-2013	09-09-2013	17	Regularization	Assistant Director	Appointed in the erstwhile FATA Sports Directorate
2)	Mr. Sikandar Shah Regional Sports Officer (a.c.b)	M.Sc.	25-04-1963	Kohat	04-06-1991	24-04-2019	18 (a.c.b)	By promotion	RSO (a.c.b)	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis.
3)	Muhammad Jamshid (District Sports Officer)	M.Sc.	05-05-1978	D.I.Khan	01-01-2005	20-12-2017	17	By promotion	DSO	Working as RSO Peshawar in OPS
4)	Muhammad Suleman (District Sports Officer)	M.Sc.	01-04-1971	Dir	06-06-1990	20-12-2017	17	By promotion	DSO	DSO Buner
5)	Mr. Anwar Kamal (District Sports Officer)	B.A	27-03-1975	D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO	Working as RSO Bannu in OPS
6)	Mr. Amir Zahid Shah (District Sports Officer)	M.Sc.	05-09-1967	Bannu	29-06-1992	20-12-2017	17	By promotion	DSO	DSO Karak
7)	Mr. Zakir Ullah (District Sports Officer)	M.A/M.Sc.	22-04-1977	Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO	Working against the post of Assistant Director
8)	Mr. Razi Ullah Khan (District Sports Officer)	M.Sc.	01-10-1979	Tank	02-09-2002	20-12-2017	17	By promotion	DSO	Working as RSO DIKhan in OPS
9)	Muhammad Ismail Khan (District Sports Officer)	M.Sc.	02-06-1977	Bannu	19-06-2005	08-03-2018	17	By Upgradation	DSO	DSO Lakki Marwat
10)	Mr. Tariq Muhammad (District Sports Officer)	M.Sc.	22-10-1972	Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO	DSO Swabi
11)	Mr. Asad Khan (District Sports Officer)	M.A.	20-05-1968	Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO	Working against the post of Assistant Director
12)	Mr. Ahmad Zaman (District Sports Officer)	M.Sc.	30-04-1980	Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO	DSO Manshra
13)	Mr. Munir Abbas (District Sports Officer)	MBA	12-3-1984	Hangu	09-08-2006	08-03-2018	17	By Upgradation	DSO	On Deputation to Tourism & Culture Authority

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S.#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 st Entry into Govt. Service	Regular appointment/ promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
14)	Kashif Farhan (District Sports Officer)	M.Phil	13-04-1984	Bannu	31-08-2017	08-03-2018	17	By Upgradation.	DSO	DSO Swat
15)	Hazrat Ullah (District Sports Officer)	MS	01-01-1984	Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Hangu
16)	Gul Rukh Gulfam (District Sports Officer)	M.Sc	01-06-1991	Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO	DSO Haripur
17)	Aasjad Iqbal, Assistant Director, Provincial HQ	MSc Botany (Gold Medalist)	19-6-1967	Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director	Assistant Director (Acctt:)
18)	Shakel Ahmad, Assistant Director, Provincial HQ	M.A.	04-1-1971	Bunir	18-1-2008	28-05-2019	17	By Promotion	Assistant Director	Assistant Director

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To.

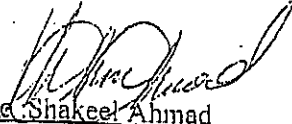
The Director General Sports,
Khyber Pakhtunkhwa, Peshawar.

D.M. 201-17/ Seniority List
Date: 28/9/21
Director General Sports
Khyber Pakhtunkhwa

Subject:- OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATOR BPS-17, DIRECTORATE GENERAL SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2021

Dear Sir,

Kindly refer to your good office letter No. 17/seniority list /2021 dated 15-09-2021 on the subject noted above and to submit herewith observations / objections regarding my seniority position for favorable action.



Name: Shakeel Ahmad

Designation: Assistant Director (Lit.)

Dated Peshawar the 28th September, 2021

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Clerks & Junior Clerks have been given, which is irrelevant because the position in said categories is the similar / same as explained in para 3 above.

Cont: Page-2

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CERTIFICATE

Subject:- OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATOR BPS-17. DIRECTORATE GENERAL SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2021

Dear Sir,

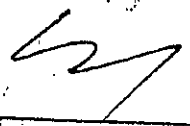
It is certified that I have gone through my particulars mentioned it Serial No. 18 of the tentative seniority list of Assistant Directors, District Sports Officers and Administrator BPS-17 and found them correct, except the following columns:-

S.No.	Column No.	Present entry	To be replaced by (attached copy, if any)	Remarks
1.	1	18	09	As per given reason / justifications

The following discrepancies are also brought into the notice:-

1. The notification No. SO (Sport) 1-41/2020/2913-6 dated 10-09-2021 is against the procedure / format laid down in the Manual of Secretariat Instructions as it relate to the clarification of objections raised on seniority position by the affecties. It was required to be issued in the form of letter and not in the shape of notification.
2. In sub Para 1 of Para 7 of the Sport Department notification No. SO (Sport) 1-41/2020/2913-6 dated 10-09-2021 it has been stated that Mr. Amjid Iqbal & Shakeel Ahmed were adjusted as Assistant (BPS-14) after being declared surplus. It is clarified that I was not adjusted from the Surplus Pool but appointed through initial recruitment by the District Government on 18-01-2008 (Copy of the order is attached). (Annexure-A)
3. In sub Para 2 of para 7 of the said notification it is stated that Mr. Amjid Iqbal and Shakeel Ahmed assumed charge on the upgraded posts of Assistant and no DPC was held. In this regard it is pointed out that in the notification of the Up-gradation of the scale of the post of Assistant from BPS-14 to BPS-16 it is clearly mentioned that the pay scale of the post of Assistant was upgraded with incumbents throughout the Province with the directions that the pay of all the incumbents of the posts of Assistant throughout the Province shall be fixed in the upgraded Pay scale without holding DPC as it was up-gradation of scale and not up-gradation of the posts. Thus there was no need to place the matter before DPC (copy attached). (Annexure-B)
The posts of Deputy District Sports Officers BPS-16 have been up-graded to the Posts of District Sports Officers BPS-17 without incumbents of the posts for which DPC is necessary as per laid down procedure (copy attached). (Annexure-C)
4. In sub para 3 of the said notification reference of superintendent, Assistants, Senior Clerks & Junior Clerks have been given, which is irrelevant because the positions of the said categories is the similar / same as explained in para 3 above.

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5. In sub-Para 4 of the said notification it is stated that in light of WP No. 428-P/2012 Peshawar High Court Peshawar judgment announced on 19-06-2013, Finance Department upgraded the post of Computer Operator in all the Departments / Offices of the Khyber Pakhtunkhwa and the incumbents took the charge without DPC / seniority. In this regard it is clarified that in the said notification of Finance Department clearly mentioned that the Pay of the incumbents will be fixed in the next higher Pay scale. As such there was no need of DPC. But in the case of Deputy District Sports Officers and District Sports Officers no such clarification was issued by the Finance Department (Copy attached). (Annexure-D)

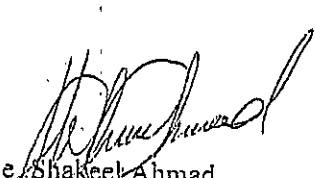
6. In sub-Para 7 of the said Notification it is stated that in the joint seniority list for promotion to the posts of Deputy Directors / Regional Sports Officers (BPS-18) Mr. Amjad Iqbal & Shakeel Ahmad had to be in the list of Assistant Directors (BPS-17) for being eligible to be in the list. Both the officers entered in to the list on 28-05-2019 while other officers on 08-03-2018.

In this regard it is stated that Mr. Amjad Iqbal & Shakeel Ahmad entered in to seniority list of Assistant Directors for Promotion to the post Deputy Directors / Regional Sports Officers through legal and regular process of DPC while the others officers (District Sports Officers) only took charge and avail all benefits of BPS-17 illegally because after the up-gradation of the posts of Deputy Districts Sports Officers BPS-16 to District Sports Officers BPS-17 DPC was required but no DPC was held for the up-graded post of Deputy Districts Sports Officers BPS-16 to District Sports Officers BPS-17.

In View of the above submission it is clear that the District Sport Officers in the Seniority List from No.9 to 16 are still BPS -16 and availing all benefits of BPS -17 without any legal procedure and they are still junior to me because I was promoted regularly through legal process of DPC on 28-05-2019.

Keeping in view the above clarification / justifications it is requested that necessary correction in the seniority list may kindly be made and my due right may be given to me.

Your's faithfully


Name: Shakeel Ahmad

Designation: Assistant Director (Lit.)

Dated Peshawar the 28th September, 2021

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Sp 42 is essential for the achievement of a happy, healthy & vigorous society.

DIRECTORATE GENERAL SPORTS, KHAYBER

PAKISTAN

Directorate General Sports, Khayber Pakhtunkhwa
Peshawar

No. Security Lin/2022-3107-34

Dated Peshawar, 16/08/2022

To

- 1. All Assistant Directors (DC Sports) Khayber Pakhtunkhwa
- 2. All Assistant Directors (Director Sports, Selected Areas)
- 3. All District Sports Officers in Khayber Pakhtunkhwa
- 4. All Secretaries (DC Sports) (RSO), Khayber Pakhtunkhwa

TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) DIRECTORATE GENERAL OF SPORTS, KHAYBER PAKHTUNKHWA FOR THE YEAR 2022.

Kindly refer to the subject mentioned above and to how to proceed in a copy of tentative seniority list of Assistant Directors, District Sports Officers and Administrators in BPS-17 of the Directorate General of Sports, Khayber Pakhtunkhwa along with the certificate proforma for general and information, objection (if any). The tentative seniority list is issued in pursuance of Establishment Department Letter No. SDR-1 (ESAD)-4/2021 dated 27/04/2022.

- 2. Incorrect entry in service particulars or objection/observation on the list may be furnished on the enclosed proforma supported by attested photocopies of rules and documents within 5 days positively otherwise, it will be considered that entries made in the list are correct.

Encl: As above.

[Signature]
DIRECTOR GENERAL

Copy forwarded for information to the:-

- 1. The Section Officer (Sports), Sports & Youth Affairs Department with att. Letter No. SC (Sports) 1-4/Security Lin/2022-3107-34 dated 22/07/2022.
- 2. Director Sports (Selected Areas), Peshawar.

[Signature]
DIRECTOR GENERAL
16/8/22

[Handwritten signature]

TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA (AS STOOD ON 15-09-2021).

25

S.#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 st Entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
1)	Mst Nazia Zakki	M.A.	05-06-1946	Kurram	09-09-2013	09-09-2013	17	Regularization	Assistant Director	Appointed in the erstwhile FATA Sports Directorate.
2)	Mr. Sikandar Shah Regional Sports Officer (a.c.b)	M.Sc.	25-04-1963	Kohat	04-06-1991	24-04-2019	18 (a.c.b)	By promotion	RSQ (a.c.b)	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis.
3)	Muhammad Jamshid (District Sports Officer)	M.Sc.	05-05-1978	D.I.Khan	01-01-2005	20-12-2017	17	By promotion	DSO	Working as RSO Peshawar in OPS
4)	Muhammad Suleman (District Sports Officer)	M.Sc.	01-04-1971	Dir	06-06-1990	20-12-2017	17	By promotion	DSO	DSO Buner
5)	Mr. Anwar Kamal (District Sports Officer)	B.A	27-03-1975	D.I.Khan	29-09-2005	20-12-2017	17	By promotion	DSO	Working as RSO Bannu in OPS
6)	Mr. Amir Zahid Shah (District Sports Officer)	M.Sc.	05-09-1967	Bannu	29-06-1992	20-12-2017	17	By promotion	DSO	DSO Kurak
7)	Mr. Zakir Ullah (District Sports Officer)	M.A/M.Sc.	22-04-1977	Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO	Working against the post of Assistant Director
8)	Mr. Razi Ullah Khan (District Sports Officer)	M.Sc.	01-10-1979	Tank	02-09-2002	20-12-2017	17	By promotion	DSO	Working as RSO DIKhan in OPS
9)	Muhammad Ismail Khan (District Sports Officer)	M.Sc.	02-06-1977	Bannu	19-06-2005	08-03-2018	17	By Upgradation	DSO	DSO Lakki Marwat
10)	Mr. Tariq Muhammad (District Sports Officer)	M.Sc.	22-10-1972	Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO	DSO Swabi
11)	Mr. Asad Khan (District Sports Officer)	M.A.	20-05-1968	Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO	Working against the post of Assistant Director
12)	Mr. Ahmad Zaman (District Sports Officer)	M.Sc.	30-04-1980	Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO	DSO Manshra
13)	Mr. Munir Abbas (District Sports Officer)	MBA	12-3-1984	Hangu	09-05-2006	08-03-2018	17	By Upgradation	DSO	On Deputation to Tourism & Culture Authority


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S#	Name of Officer and Designation	Academic Qualification	D.O.B	Domicile	Date of 1 st Entry into Govt. Service	Regular appointment/ promotion to the present posts			Present appointment	Remarks
						Date	BPS	Method of recruitment / appointment		
14)	Kashif Farhan (District Sports Officer)	M.Phil	13-04-1984	Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Swat
15)	Hazrat Ullah (District Sports Officer)	MS	01-01-1984	Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO	DSO Hangu
16)	Gul Rukh Gulfam (District Sports Officer)	M.Sc	01-06-1991	Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO	DSO Haripur
17)	Ainjad Iqbal, Assistant Director, Provincial HQ	MSc Botany (Gold Medalist)	19-6-1967	Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director	Assistant Director (Acctt:)
18)	Shakel Ahmad, Assistant Director, Provincial HQ	M.A.	04-1-1971	Bunir	18-1-2008	28-05-2019	17	By Promotion	Assistant Director	Assistant Director

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The Director General of Sports
Khyber Pakhtunkhwa Peshawar

Date: 1040-17/S. Lsc
30/8/22 9~

SUBJECT:-

OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICTS SPORTS OFFICERS AND AMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2022.

Dear Sir,

Kindly refer to your good office letter No 17/Seniorty list/2022 dated 16/08/2022 on the subject noted above and to submit here with observations/objection regarding my seniority position for favorable action.


(Shakti Ahmad)

Assistant Director (BPS-17)

Dated:- 29-08-2022

~~Director (Ops)~~
AD (HQ) 30/8

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CERTIFICATE

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SUBJECT:-

OBJECTION ON TENTATIVE SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICTS SPORTS OFFICERS AND AMINISTRATORS (BPS-17), DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA FOR THE YEAR 2022.

It is certified that I have gone through my particulars mentioned at Serial No. 18 of the tentative seniority list of Assistant Directors, Districts Sports Officers and Administrators (BPS-17) and found them correct except at the following columns:-

S.#	Column No.	Present entry	To be replaced by (attach copy if any)	Remarks
1	1	18	9	

The following discrepancies are also brought into the notice:-

1. The subject tentative seniority list was issued on 1-5-2020 for the year 2020 and I objected to it dated 22-06-2020 (Annexure -A).
2. In the light of the Sports Department Notification No. SO(Sports)1-41/2020/2913-16 dated 10-9-2021, the Directorate General of Sports issued the said seniority list vide letter No.17/Seniority list/2021 dated 15-9-2021 (Annexure-B) and I again objected to it dated 28-9-2021 (Annexure - C).
3. Now the subject seniority list has been issued for the third time vide No. 17/Seniority list/2021/5051-54 dated 16/8/2022. My objections are still same as already raised two times previously mentioned at serial Nos. 1 & 2 above.
4. In the first seniority list the name of Miss Nazia Zaki was not included as she do not belong to cadre but her name has been included in the seniority list issued second time on 15/9/2021 which is not understood. Her name may therefore be removed from the seniority list.

Dear Sir,

My objections are same on the subject current tentative seniority list as already objected on the first and second tentative seniority list as explain above.

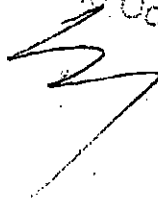
It is therefore requested that my objections may kindly be accepted being valid and justified on the basis of facts.


(Shakil Ahmad)

Assistant Director (BPS-17)

Dated:- 29-08-2022

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Sports are essential for the development of a happy, healthy & vigorous society

DIRECTORATE GENERAL OF SPORTS

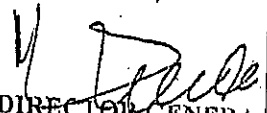
KHYBER PAKHTUNKHWA
PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT.
Ph: # 9212767, Fax # 9212766

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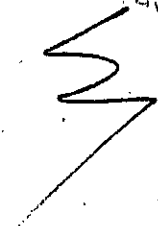
Dated Peshawar, the 27th January, 2023

CERTIFICATE

It is further certified that the final seniority list of ADs, DSOs & Administrators (BPS-17) stood on 18-01-2023 is circulated, not subjudice in any Court of Law and not disputed.


DIRECTOR GENERAL
Sports, Khyber Pakhtunkhwa
Peshawar

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SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS & ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS KHYBER PAKHTUNKHWA

ISSUED ON: 18-01-2023.

Total Sanctioned Posts: 46 Posts i.e 07 posts of Assistant Directors, 28 Posts of District Sports Officers & 11 posts of Administrators.
 Vacant Posts: 46 Posts

BASIC PAY SCALE: 17

S.#	Name of Officer with academic Qualifications	Date of birth and domicile	Date of 1 st entry into Govt. Service	Regular appointment / promotion to the present posts			Present appointment with date	Remarks
				Date	BPS	Method of recruitment / appointment		
1)	Mr. Sikandar Shah, Regional Sports Officer (a.c.b), M.Sc	25-04-1963 Kohat	04-06-1991	20-05-2014	17	By promotion	RSO (a.c.b) 20-05-2014	Promoted to the rank of Regional Sports Officer (BPS-18) on 24-04-2019 on acting charge basis. His seniority has been fixed w.e.f. 20-05-2014 in light of the judgments of PHC.
2)	Mr. Muhammad Jamshid, (District Sports Officer), M.Sc.	05-05-1978 D.I.Khan	01-01-2005	20-05-2014	17	By promotion	DSO 20-05-2014	The seniority has been fixed w.e.f. 20-05-2014 in light of the judgments of PHC.
3)	Mr. Muhammad Suleman, (District Sports Officer), M.Sc.	01-04-1971 Dir Lower	06-06-1990	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
4)	Mr. Anwar Kamal, (District Sports Officer), B.A	27-03-1975 D.I.Khan	29-09-2005	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
5)	Mr. Amir Zahid Shah, (District Sports Officer), M.Sc.	05-09-1967 Bannu	29-06-1992	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
6)	Mr. Zakir Ullah, (District Sports Officer), M.A/ M.Sc.	22-04-1977 Peshawar	29-09-2005	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
7)	Mr. Razi Ullah Khan, (District Sports Officer), M.A/ M.Sc.	01-10-1979 Tank	02-09-2002	20-05-2014	17	By promotion	DSO 20-05-2014	-do-
8)	Muhammad Ismail Khan, (District Sports Officer), M.A/ M.Sc.	02-06-1977 Bannu	19-06-2005	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
9)	Mr. Tariq Muhammad, (District Sports Officer), M.A/ M.Sc.	22-10-1972 Swabi	26-06-1997	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
10)	Mr. Asad Khan, (District Sports Officer), M.A	20-05-1968 Mardan	20-03-2006	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
11)	Mr. Ahmad Zaman, (District Sports Officer), M.Sc.	30-04-1980 Haripur	17-06-2009	20-05-2014	17	By Upgradation	DSO 20-05-2014	-do-
12)	Mr. Munir Abbas, (District Sports Officer), MBA	12-3-1984 Hangu	09-08-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	On Deputation to Tourism & Culture Authority

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S.#	Name of Officer with academic Qualifications	Date of birth and domicile	Date of 1 st entry into Govt. Service	Regular appointment/ promotion to the present posts			Present appointment with date	Remarks
				Date	BPS	Method of recruitment / appointment		
13)	Mr. Kashif Farhan, (District Sports Officer), M.Phil	13-04-1984 Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	Working against the post of RSO Swat in OPS
14)	Mr. Hazrat Ullah, (District Sports Officer), PhD	01-01-1984 Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Hangu
15)	Mrs. Gul Rukh Gulfam, (District Sports Officer), M.Sc	01-06-1991 Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	DSO Peshawar
16)	Mr. Amjad Iqbal, Assistant Director, Provincial HQ, MSc Botany (Gold Medalist)	19-6-1967 Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Assistant Director (Accounts)
17)	Mr. Shakel Ahmad, Assistant Director, Provincial HQ, M.A	04-1-1971 Buner	18-1-2008	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Assistant Director (Operation)
18)	Mr. Hamid Ali, Assistant Director, Provincial HQ, BIT (Hons:)	16-06-1985 Charsadda	14-07-2008	04-01-2022	17	By promotion	Assistant Director 04-01-2022	Assistant Director (H.Q)

The seniority of officers mentioned at S.No.1 to 11 has been fixed w.e.f. 20-05-2014 in light of the judgment of Peshawar High Court (Annex-I) and creation of supernumerary posts without back benefits by the Finance Department (Annex-II).

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بخدمت جناب سیکرٹری سپورٹس گورنمنٹ آف خیبر پختونخوا پشاور

عنوان:- اعتراض برائے سنیارٹی لسٹ اسسٹنٹ ڈائریکٹر، ڈسٹرکٹ سپورٹس آفیسر، ایڈمنسٹریٹو سٹیٹس بورڈ 18/01/2023

جناب عالی:-

گزارش ہے کہ ڈائریکٹوریٹ جنرل آف سپورٹس خیبر پختونخوا میں اسسٹنٹ ڈائریکٹر، ڈسٹرکٹ سپورٹس آفیسر، ایڈمنسٹریٹو سٹیٹس بورڈ کا سنیارٹی لسٹ 18/01/2023 کو ایٹو ہوا ہے جو کہ پہلے بھی دو دفعہ ایٹو ہوا تھا جس پر ہم نے اعتراض کیا تھا، لیکن ابھی تک اس کا کوئی جواب نہیں آیا۔

جناب عالی:-

اب سنیارٹی لسٹ کو 18/01/2023 کو ایٹو ہوا ہے جس پر ہمارا اعتراض ہے اور اس پر سب سے بڑا اعتراض یہ ہے کہ اس کو چھپکے سے ایٹو کیا ہے اور ہم کو بے خبر رکھا گیا ہے لیکن ہمیں سنیارٹی لسٹ کی کاپی مل ہے۔

ہمارا اعتراض اس پر وہی ہے جو پہلے تھا لیکن اس میں ایک اضافہ کر دیا ہے کہ اس کو چھپکے سے ایٹو ہوا ہے اور ہمارے معزز ساتھی نے اس پر پروموشن کیلئے کام بھی شروع کیا۔ جناب والا، اللہ تعالیٰ نے ایسا کوئی مسئلہ پیدا نہیں کیا ہے جس کا حل نہ ہو۔ موجودہ سنیارٹی لسٹ کے بارے میں، میں مندرجہ ذیل تجاویز پیش کرتا ہوں۔

1- اس سنیارٹی لسٹ میں سے لیکر 7 تک ہمارا کوئی اعتراض نہیں ہے کہ اگر ممکن ہو تو ان کا کیس PSB کو بغیر کسی ٹنک و شپ ارسال کر سکتے ہیں۔

2- جن DSOs کی ایگریڈیشن ہوئی ہے وہ ابھی تک 16 گریڈ میں ہے اور 17 کے مراعات لے رہے ہیں ان کی DPC کیا جائے۔

3- اگر پیر 21 تجویز قابل عمل نہیں ہے تو سنیارٹی کو الگ الگ کریں۔ DSO کو RSO اور AD کو DD سنیارٹی دی جائے۔ admin کیلئے chief admin کا پوسٹ کرینٹ کیا جائے جس طرح کو پوز کی سنیارٹی میں ہوا ہے۔

4- اگر پیر 31 کی تجویز قابل عمل نہیں ہے تو پھر فیصد کے لحاظ سے سنیارٹی دی جائے 70 فیصد DSO، 20 فیصد ADS اور 10 فیصد admin

جناب والا مندرجہ بالا تجاویز صرف اور صرف 8 سے لیکر 17 تک کے آفیسر کیلئے ہے اسے لیکر 7 تک اس تجاویز میں شامل نہیں ہیں اسکو جس طرح چاہیں پروموشن دیا جائے۔

العارض

کھلیل احمد

اسسٹنٹ ڈائریکٹر ڈائریکٹوریٹ جنرل آف سپورٹس، خیبر پختونخوا

DD (ASE)

کاپی برائے اطلاع یابی

1- ڈائریکٹر جنرل سپورٹس خیبر پختونخوا

2- سیکرٹری اسٹیبلشمنٹ گورنمنٹ آف خیبر پختونخوا پشاور؛ اس درخواست کے ساتھ کی مذکورہ سنیارٹی لسٹ متعلقہ ہے لہذا اس کو کوئی تبدیلی نہ کرے۔

اسسٹنٹ ڈائریکٹر ڈائریکٹوریٹ جنرل آف سپورٹس، خیبر پختونخوا

ATTESTED
to be true Copy

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BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

CM. No. _____ /2023

Shakel Ahmad

versus

Director General & Others

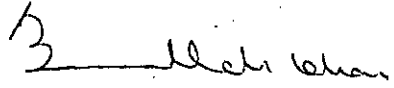
**APPLICATION FOR DIRECTION TO RESPONDENTS TO
NOT MAKE FURTHER PROMOTION:**

Respectfully Sheweth:

1. That applicant filed the subject Appeal before this hon'ble Tribunal today.
2. That prima facie case exists, balance of convenience lies in favor of applicant and is hopeful of the success of the appeal.
3. That if juniors were promoted to the post of Deputy Director / Regional Sports Officers B-18 then the Service Appeal would become infructuous.
4. That facts and grounds of the appeal be treated as integral part of this application for grant of Interim relief.

It is, therefore, most humbly requested that the official respondents be restrained from promoting R. No. 05 to 12 to the post of Deputy Director / Regional Sports Officers B-18 till the final decision of the case.

Through Applicant


(Saadullah Khan Marwat)
Advocate

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BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

C.M. No. _____ /2023

Shakel Ahmad versus Director General & Others

AFFIDAVIT

I, Shakel Ahmad, Applicant, do hereby solemnly affirm and declare that contents of **Application** are true and correct to the best of my knowledge and belief.

[Handwritten signature]
15/10/23

[Handwritten signature]

DEPONENT



بعد القیت جناب سرور کے طرز پر عمل صورت پر مشتمل ہے

مخواب اسٹیلٹ

تاریخ ۱۷ جون ۱۹۷۳ء
مقام
دعویٰ

باعتبار

مقررہ مندرجہ عنوان بالا میں ایسی طرف سے واسطے پیروی و جواب دہی و عمل کاروائی مستغافہ ان مقام پر
کیسٹ اسٹیلٹ آفیسر جن صاحب نے ایڈووکیٹ اے بی کورٹ کو وکیل مقرر کرنے کے اقرار کیا جاتا ہے کہ صاحب
مذکورہ کو مقدمہ کی کاروائی کا کابض اختیار ہوگا نیز وکیل صاحب کو کرنے والی نامہ و اقرار نامہ، و فیصلہ برتلاف
دینے جواب دہی اور اقبال دعویٰ اور لٹری کے لئے اجراء اور وصولی چیک و ریپورٹ اور مرضی دعویٰ اور درخواست
پر مشتمل کی تصدیق اور ان پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا تاخیر یا غلطی یا اہل کی برآمدگی
اور کسی بھی چیز دار کرنے یا اہل نگران و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ منسوخ
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مقرر قانونی کو اپنے ہمراہ یا اپنی بجائے لٹری کا اختیار ہوگا
اور فیصلہ مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر واضحہ منظور
قبول ہوگا و دوران مقدمہ میں جو شرطیں و ہر جائزہ التوا مقدمہ کے ساتھ ہوگا اس کے مستحق وکیل صاحب
مذکورہ ہوں گے نیز لٹریاں و فرسبہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام روزہ
پر ہو یا بد سے باہر ہو تو وکیل صاحب یا مقرر ہوں گے کہ پیروی مذکور کریں۔
لہذا رکالت نامہ رکھ دیا کہ سند ہے۔

الرقوم ۱۷-۰۶-۷۳

القید القید القید

اریاب سیف اسٹیلٹ
ایڈووکیٹ

سید الشہد خان مراد آباد
ایڈووکیٹ

اسٹیلٹ ایڈر

امجد کواز
ایڈووکیٹ