

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 6726/2021

BEFORE: **MR. SALAH-UD-DIN** ... **MEMBER (J)**
MISS FAREEHA PAUL ... **MEMBER (E)**

Mr. Riazullah S/O Abdul Qadir, Naib Qasid (BPS-04), District Office,
Social Welfare Department, Peshawar..... (*Appellant*)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary, Social Welfare,
Special Education & Women Empowerment Department, Civil
Secretariat, Peshawar.
2. The Director, Social Welfare, Special Education & Women
Empowerment Department, Peshawar.
3. The District Officer, Social Welfare Department, District Charsadda.
..... (*Respondents*)

Mr. Muhammad Mahaz Madni,
Advocate ... For appellant

Mr. Asad Ali Khan,
Assistant Advocate General ... For respondents

Date of Institution..... 05.07.2021
Date of Hearing..... 08.06.2023
Date of Decision..... 08.06.2023

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the inaction of the respondents by not promoting the appellant to the post of Junior Clerk (BPS-11) in the light of promotion quota reserved for Class-IV employees and against not taking any action on his departmental appeal dated 16.03.2021 within the statutory period of ninety days. It has been prayed that on acceptance of this appeal the



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inaction of the respondents by not considering the appellant for promotion to the post of Junior Clerk (BPS-11) in light of the quota reserved for Class-IV employees might be declared illegal and the respondents be directed to consider him for promotion to the post of Junior Clerk (BPS-11) from the date when his colleagues and juniors were given promotion with all back alongwith consequential benefits and any other remedy, which the Tribunal deemed fit and appropriate.

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as Naib Qasid (BPS-01) now (BPS-04) in the respondent Department on 16.06.2007. He assumed the charge of the post on 18.06.2007 and was placed at S.No. 16 in the seniority list as circulated on 04.09.2019. The appellant improved his educational qualification by acquiring SSC from the Board of Intermediate & Secondary Education, Peshawar in the year 2008, whereas HSSC was in progress. In the year 2017, the respondent No. 2 issued letter dated 13.12.2017 wherein PIRs for five years i.e. 2013-2017 alongwith willingness/non-willingness was asked for promotion of Class-IV employees to the post of Junior Clerk (BPS-11) which was submitted to respondent No. 2 by respondent No. 3 vide letter dated 21.12.2017 alongwith willingness signed by the appellant. The appellant came to know through reliable source that respondents had issued promotion order dated 30.07.2020, whereby various categories of employees including colleagues and juniors of the appellant were given promotion to the post of Junior Clerk (BPS-11) by ignoring the appellant despite having sufficient length



of service. Feeling aggrieved, he filed departmental appeal on 16.03.2021 which was forwarded to respondent No. 2 vide letter dated 25.03.2021 and remained unresponded within the statutory period; hence the instant appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We heard the learned counsel for the appellant as well as the learned Assistant Advocate General for the respondents and perused the case file with connected documents in detail.

4. Learned counsel for the appellant, after presenting the case in detail, contended that the appellant was not treated in accordance with law and rules. He further contended that the appellant had acquired the requisite qualification, with at least 14 years experience, and according to the notification dated 18.07.2019 issued by the Establishment Department of Khyber Pakhtunkhwa, he was fully entitled for promotion to the post of Junior Clerk (BPS-11) but vide order dated 30.07.2020, his colleagues/junior colleagues were promoted in the light of Section 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Section-7 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 while the appellant was ignored. He requested that the appeal might be accepted.

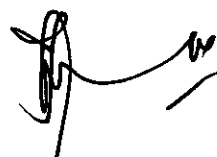
5. Learned Assistant Advocate General, while rebutting the arguments of learned counsel for the appellant, contended that since the upgradation of post of Junior Clerk from BPS-07 to BPS-11, service rules were revised and only those class-IV employees were declared fit for promotion to the post of



Junior Clerk (BPS-11) who availed a minimum of FA/F.Sc qualification. He further contended that pursuant to the amendment in Service Rules vide notification dated 25.09.2019, seniority lists were amended on the basis of date of acquisition of the prescribed qualification i.e. FA/F.Sc. Since the appellant did not have the prescribed qualification hence the respondents only issued promotion orders of those employees who had the requisite qualification of FA/F.Sc. He requested that the appeal might be dismissed.

6. After hearing the arguments and going through the record presented before us it is clear that the appellant was appointed as Naib Qasid in the respondent department in 2007. During the course of his service, he improved his qualification and acquired the Secondary School Certificate in 2008. The respondent department, after upgradation of the post of Junior Clerk from BS-7 to BS-11, amended the Service Rules and prescribed the minimum qualification for promotion as FA/F.Sc. from a recognized board, with two years service for that post; 30% quota was reserved for Daftari, Naib Qasid; Chowkidar, Sweeper, Mali, Security Guard etc. and a joint seniority list of all the posts was maintained. After amendment in the rules, seniority list was revised and certain promotions were made based on that revised seniority list. The appellant felt aggrieved of those promotions and filed a departmental appeal which was not responded and hence he approached this Tribunal.


7. From the details presented before us there is no doubt that the appellant at the relevant time had the length of service required for




promotion but he lacked the minimum qualification of FA/F.Sc from a recognized university required as per Service Rules notified on 25.09.2019.

8. In view of the foregoing, the appeal in hand is dismissed. Costs shall follow the event. Consign.

9. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 08th day of June, 2023.*



(FAREEHA PAUL)
Member (E)



(SALAH-UD-DIN)
Member (J)

Fazle Subhan, P.S

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8th June, 2023 01. Mr. Muhammad Mahaz Madni Advocate for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgment consisting of 05 pages, the appeal in hand is dismissed. Costs shall follow the event. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 08th day of June, 2023.*

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(FAREEHA PAUL)
Member (E)


(SALAH-UD-DIN)
Member (J)

Fazle Subhan, P.S

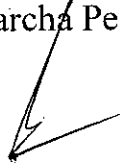
17.05.2023


Appellant in person present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is unable to attend the Tribunal today due to death of his uncle. Adjourned. To come up for arguments before the D.B on 09.06.2023. Parcha Peshi given to the parties.

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Naeem Amin


(Muhammad Akbar Khan)
Member (E)


(Salah-ud-Din)
Member (J)

06th Dec. 2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Appellant submitted an application for adjournment on the ground that his counsel was busy before the Hon'ble Peshawar High Court Mingora Bench, Swat. Last opportunity granted to the appellant to argue the case failing which the case will be decided on the available record. To come up for arguments on 13.03.2023 before the D.B. P.P is given to the parties.

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(Fareeha Paul)
Member(Executive)



(Kalim Arshad Khan)
Chairman

13th March, 2023

Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment being not prepared for arguments today. Adjourned. To come up for arguments on 17.05.2023 before the D.B. Parcha Peshi given to the parties.

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(Salah-ud-Din)
Member (J)



(Kalim Arshad Khan)
Chairman

30.09.2022

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Former made a request for adjournment as he has not made preparation of the case. Adjourned. To come up for arguments on 17.11.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

17.11.2022

Appellant present in person.

Naseer Uddin Shah learned Assistant Advocate General alongwith Haider Ali Assistant for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 06.12.2022 for arguments before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

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25.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 17.03.2022 for the same as before.



Reader.

17.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 9.06.2022 for the same as before.



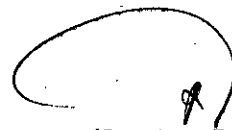
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09.06.2022

Appellant present in person.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Nabi Gul Superintendent for respondents present.

Reply on behalf of respondents was submitted. Copy of the same was handed over to the appellant. To come up for rejoinder, if any, and arguments on 21.07.2022 before D.B.



(Rozina Rehman)
Member (J)

21.07.2022

Counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Former requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 12.08.2022 before D.B.

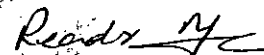


(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)


12-8-22 Proper DB not available the case is adjourned to 30-9-22

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06.01.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General present. None present on behalf of respondent department.

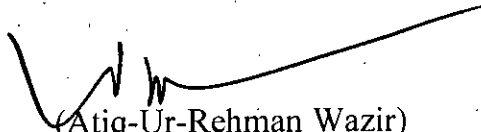
Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General sought time for submission of reply/comments. Another last opportunity is extended subject to costs of Rs.5000/ to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 11.01.2022.


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

01.02.2022

Appellant in person present. Mr. Kabirullah Khattak, Addl. AG for respondent present.


Reply/comments on behalf of respondents are still awaited. Notice be issued to respondent department for submission for reply/comments. To come up for reply/comments before the S.B on 25.02.2022. Status quo be maintained till the date fixed.


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

03.11.2021 Appellant present in person.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Awais Senior Clerk for respondents present.

Reply on behalf of respondents is still awaited. Learned A.A.G made a request for time to submit reply/comments; granted with direction to furnish the same within 10 days in office positively. If the reply/comments are not submitted within stipulated time, the right of respondents for submission of reply shall be deemed as struck off. To come up for arguments on 15.12.2021 before D.B. Status quo be maintained till the date fixed.


(Rozina Rehman)
Member (J)


Chairman

15.12.2021 Appellant in person present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Granted but as a last chance. To come up for written reply/comments on 06.01.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

10.09.2021

Clerk of counsel for the appellant present. Mr. Asif Masood Ali Shah, 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 08.10.2021. Status-quo be maintained till the date fixed.



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



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

08.10.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Former seeks adjournment due to engagement of his learned counsel before the Hon'ble High Court today. Request is accorded. To come up for arguments on 03.11.2021 before the D.B. Status quo be maintained till the date fixed.



(Mian Muhammad)
Member(Executive)



Chairman

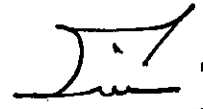
23.08.2021

Mr. Muhammad Maaz Madni, Advocate, for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contends that the appellant is serving as Naib Qasid in District Office Social Welfare Department Charsadda, who is eligible for his promotion to the post of Junior Clerk, however the respondent issued promotion order dated 30.07.2020, whereby certain colleagues of the appellant as well as certain employees junior to the appellant were promoted to the post of Junior Clerk by ignoring the appellant, without any plausible reasons.

Points raised need consideration, therefore, the appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 10.09.2021 before the D.B.

The appeal is accompanied by an application for restraining the respondents from issuing any promotion orders to the post of Junior Clerk in the reserve quota. Notice of the application be issued to the respondents and meanwhile, status-quo be maintained till the date fixed subject to notice.



(SALAH-UD-DIN)
MEMBER (J)

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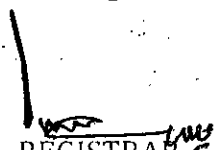

Appellant Deposited
Security & Process Fee

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 6726 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/07/2021	<p>The appeal of Mr. Riazullah presented today by Mr. Muhammad Maaz Madni Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/08/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

RIAZ ULLAH

VS

GOVT. OF KP & OTHERS

I N D E X

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1 - 4
2	Petition for Status Quo	5
3	Appointment order dated 16-06-2007	A	6
4	Seniority List	B	7 - 8
5	Educational Testimonials	C	9
6	letter dated 13-12-2017	D	10
7	letter dated 21-12-2017	E	11
8	Willingness	F	12
9	Order Dated 30-07-2020	G	13 - 15
10	Departmental Appeal dated 16-03-2021 & letter dated 25-03-2021	H	16 - 17
11	Notification dated 18-07-2019	I	18 - 20
12	Wakalatnama	-----	21

APPELLANT

Through:



MUHAMMAD MAAZ MADNI, 5/7

ADVOCATE, HIGH COURT, PESHAWAR

Khattak Law Associates,

Juma Khan Plaza,

WarsakRaod, Peshawar

0333-9313113, 0345-9090737

muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 6726 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6779

Dated 05/7/2021

Mr. RIAZ ULLAH s/o Abdul Qadir, Naib Qasid (BPS-04),
District Office, Social Welfare Department, Charsadda.

..... APPELLANT

VERSUS

- 1- GOVERNMENT OF KHYBER PAKHTUNKHWA,
through Secretary, Social Welfar, Special Education & Women
Empowerment Department, Civil Secretariat, Peshawar.
- 2- THE DIRECTOR,
Social Welfar, Special Education & Women Empowerment Department,
Jamrud Road, Peshawar.
- 3- THE DISTRICT OFFICER, Social Welfare Department, District Charsadda
Takht Bhai Road, near Hashtnagar Floor Mills, Charsadda.

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE INACTION OF THE RESPONDENTS BY NOT
PROMOTING THE APPELLANT TO THE POST OF JUNIOR
CLERK (BPS-11) IN LIGHT OF PROMOTION QUOTA
RESERVED FOR CLASS-IV EMPLOYEES AND AGAINST NOT
TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL
DATED 16-03-2021 OF THE APPELLANT WITHIN THE
STATUTORY PERIOD OF NINETY (90) DAYS

PRAYER:

That on acceptance of this appeal the inaction of the
respondents by not considering the appellant for promotion
to the post of Junior Clerk (BPS-11) in light of the quota
reserved for Class-IV employee may very kindly be declared
illegal and the respondents may kindly be directed to
consider the appellant for promotion to the post of Junior
Clerk (BPS-11) from the date when his colleague/junior
colleagues are given promotion with all back & consequential
benefits. Any other remedy which this august Tribunal deems
appropriate that may also be awarded in favor of the
appellant.

Respectfully Sheweth:.

FACTS:

Brief facts giving raise to the instant appeal are as under:

Filed to-day
Registrar
05/07/2021

1. That appellant is the employee of the respondent Department and is appointed as Naib Qasid (BPS-01) now (BPS-04) vide order dated 16-06-2007 with the terms & condition mentioned therein in the appointment order and since from the date of appointment the appellant the appellant is working quite efficiently, whole heartedly and upto the entire satisfaction of his high ups.

Copy of Appointment Order is attached as Annexure A.

2. That the appellant was medically examined and was declared medically fit for government job by the concerned Medical Officer as such assumed the charge of the post on 18-06-2007 and accordingly the appellant is given due placed and stood at serial no. 16 on 31-12-2018 in the seniority list as circulated on 04-09-2019.

Copy of the Seniority List is attached as Annexure B.

3. That appellant along with the performance of his official duties has also improved his education qualification by acquiring SSC from Board of Intermediate & Secondary Education Peshawar in the year 2008, whereas HSSC is in progress.

Copy of Educational Testimonials are attached as Annexure C.

4. That it is pertinent to mention here that in the year 2017 the respondent No. 2 issued letter dated 13-12-2017 wherein PERs for five years i.e. 2013-2017 alongwith willingness/non willingness was asked for promotion of Class-IV to the post of Junior Clerk (BPS-11) which was submitted to respondent no. 2 by respondent no. 3 vide letter dated 21-12-2017 along with willingness signed by the appellant.

Copy of Letter dated 13-12-2017, 21-12-2017 & Willingness is attached as Annexure D, E & F.

5. That the appellant came to know through reliable source that respondents has issued promotion order dated 30-07-2020 whereby various categories of employees including colleagues and junior colleagues to the appellant were given promotion to the post of Junior Clerk (BPS-11) by completely ignoring the appellant having sufficient and eligible length of service.

Copy of the Order Dated 30-07-2020 is attached as Annexure G.

6. That appellant aggrieved from the inaction of the respondents by not promoting the appellant to the post Junior Clerk (BPS-11) filed Departmental Appeal dated 16-03-2021 which was forwarded to respondent no. 2 vide letter

dated 25-03-2021 but till date no response has been received after the lapse of statutory period.

Copy of the Departmental Appeal dated 16-03-2021 & letter dated 25-03-2021 is attached as Annexure H.

7. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others.

GROUND:


- A- That act of the respondents by not promoting the appellant to the post of Junior Clerk (BPS-11) having all the requisites is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of Law.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That all the requisites required for promotion to the post of Junior Clerk (BPS-11) is available with the appellant but even then the respondent is not promoting the appellant to the post of Junior Clerk (BPS-11).
- D- That the appellant has the requisite qualification from a reputed and recognized institution with at least 14 years of service experience since from the date of appointment and according to the notification dated 18-07-2019 issued by the Establishment Department of Khyber Pakhtunkhwa the appellant is fully entitled for promotion to the post of Junior Clerk (BPS-11).
- Copy of the Notification dated 18-07-2019 is attached as Annexure I.
- E- That appellant is fully entitled for promotion to the post of Junior Clerk (BPS-11) w-e-f 30-07-2020 when his colleagues/ Junior Colleagues is given promotion to the post of Junior Clerk (BPS-11) in light of the section 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Section-7 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.
- F- That act of the respondents by not promoting the appellant to the post of Junior Clerk is against the prevailing Law & Rules.

- G- That respondents violated Article 38 (e) of the Constitution of Islamic Republic of Pakistan 1973, according to which state is bound to eliminate disparity in the income and earning of individuals including persons in the various service of Pakistan, thus in light of the above quoted Article of the Constitution the respondents are duty bound to modify/ rectify the impugned promotion order dated 30-07-2020 and the appellant be promoted to the post of Junior Clerk (BPS-11) with all back benefits.
- H- That, the respondent Department acted in arbitrary and malafide manner while not promoting the appellant to the post of Junior Clerk (BPS-11).
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that appeal of the appellant may be accepted as prayed for.

Dated: 05-07-2021

APPELLANT


RIAZ ULLAH

Through:


MUHAMMAD MAAZ MADNI
Advocate, High Court, Peshawar

CERTIFICATE

No, such like appeal has been filed or pending between the parties before this Honourable Tribunal.


ADVOCATE

AFFIDAVIT

I, Mr. Riaz Ullah s/o Abdul Qadir, do hereby solemnly affirm on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.


DEPONENT

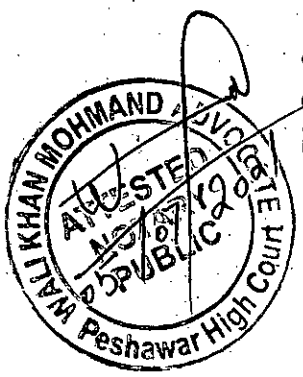
17101-0399030-7

NOTE:

Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.


ADVOCATE

5/7



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

RIAZ ULLAH

VS

GOVT. OF KP & OTHERS

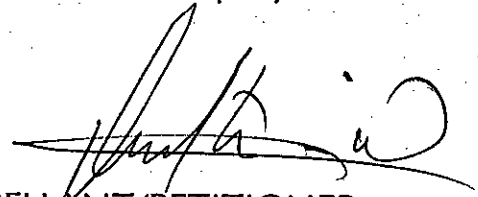
APPLICATION FOR RESTRAINING THE RESPONDENTS
NOT TO ISSUED ANY PROMOTION ORDER IN RESPECT
OF JUNIOR CLERK (BPS-11) IN THE RESERVE QUOTA

Respectfully Sheweth:

1. That, the appellant has filed the instant appeal for his promotion to the post of Junior Clerk (BPS-11) before this Honourable Tribunal in which no date has so far been fixed.
2. That, all the three ingredients required for the grant of status Quo are in favour of the appellant.
3. That, the instant application/petition may very kindly be consider as part and parcel of the main appeal.

It is, therefore, most humbly prayed that on acceptance of the instant application/petition the respondents may very kindly be restrained not to issue any promotion order in respect of Junior Clerk (BPS-11) in the quota reserved for Class-IV employees.

Dated: 05-07-2021



APPELLANT/PETITIONER

Through:



MUHAMMAD MAAZ MADNI,
ADVOCATE, HIGH COURT, PESHAWAR

6

DISTRICT GOVERNMENT CHARSADE
SOCIAL WELFARE DEPARTMENT

Dated Chd: the 16/6/2007

ANNEXURE - A

OFFICE ORDER

No. DC/SW/CHD/60-10-45. Mr. Riaz Ullah S/O Abdul Qader Khan resident of Village Sheikhabad Rajjar District Charsadda is hereby appointed as Naib Qasid in BPS- 1 (2150-65-4100) plus regular allowances on regular basis on the following terms and conditions:-

1. He shall produced Medical Fitness Certificate issued by the Medical Superintendent DHQ Hospital Charsadda.
2. His Services shall be governed by such Rules/Regulations, Orders, Act and Ordinance etc, relating to the appointment, Transfer, leaves, efficiency and discipline and conduct as have been may be prescribed by the Government for the category of the government Servant of their states from time to time.
3. He shall not be entitled to any pension/gratuity.
4. He will have to submit one Month pay prior notice to the Department or for forfeit one month pay in lieu to the Government.
5. He will take over charge of the post with in 10 days after the receipt of this order, other wise the offer of appointment will stand cancelled.
6. 10% C.P fund shall be deducted from their monthly pay in accordance with NWFP Civil Servant (Amendment) Act 2005.
- 7.

EXECUTIVE DISTRICT OFFICER
SOCIAL WELFARE CHARSADE

End it : No and date even.

Copy forwarded to:-

1. The District Coordination Officer Charsadda with reference to his verbal permission dated 14/6/2007.
2. The Personal Assistant to Minister Zakat, Usher, & Social Welfare Department NWFP, with reference to his letter No. Nil dated 9/6/2007.
3. The Director Social Welfare NWFP Peshawer.
4. The District Account Officer Charsadda.
5. Mr. Riaz Ullah S/O Abdul Qader Khan S/o Shekh Abad Rajjar District Charsadda for compliance

ATTESTED
to be true
Advocate

EXECUTIVE DISTRICT OFFICER
SOCIAL WELFARE CHARSADE



091-9224253

Government of Khyber Pakhtunkhwa
Directorate of Social Welfare, Special Education and
Women Empowerment Jamrud Road Peshawar.

No. E-17-56-DSW-Vo-II 6932-35

In pursuance of Section 8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989, Tentative Seniority List of Matriculate Class-IV Employees BPS (3-5) of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, as stood on 31-12-2018 is hereby notified for the information of all concerns.

Dated 19-03-2019

ANNEXURE B

7

No 1708
21/04/19

Name of official	F- Name	Designation	Date of birth	Domicile	Qualification	Year of Passing Matriculate Examination	Date of 1 st Entry into Govt Service	Name of Office	Remarks
1	Muhammad Ilyas	Amir Ali							
2	Munir Ahmad	Abdul Aziz							
3	Munhir Mashi Bhatti	Maqbool Mashi	Workshop Atten.	16-01-1967	DI Khan	Matric			
4	Aziz Rehmat	Abdur Rahim	Chowkidar	3/2/1967	DI Khan	Matric			
5	Zahid Hussain	Ghulam Hussain	Sweeper	30-04-1969	DI Khan	Matric	1985 (A)	5/1/1984	GIB DI Khan
6	Zafar Alam	Mir Alam	Naib Qasid	3/3/1962	Chitral	Matric	1988	20-7-1991	DO SW DI Khan
7	Zafar Iqbal	Rab Nawaz	Chowkidar	15-8-1971	Mansehra	Matric	1989	13-08-1995	GIB DI Khan
8	Khair Muhammad Khan	Gul Zaman Khan	Naib Qasid	4/4/1974	Abbottabad	Matric (A)	1982(A)	1/2/1997	DO, SW Chitral
9	Lal Mehmood	Yousaf Muhammad	Chowkidar	23-09-1970	DI Khan	Matric	1997(A)	16-3-1995/26-4-2003 (Re-instated)	DO, SW Manshra
10	Yar Kamin Khan	Khan Muhammad	Naib Qasid	9/5/1972	Dir Lower	Matric	1990		P.F Incomplete
11	Muhammad Aman	Awal Khan	Chowkidar	1/4/1983	Dir Lower	Matric	2002	19-06-1999	Darul Aman A. Abad
12	Muhammad Sajid	Ghulam Sadiq	Naib Qasid	15-2-1981	Dir Lower	Matric	1992	13-08-1995	GIB DI Khan
13	Asghar Munir	Mir Hassan Khan	Workshop Atten.	1/10/1984	Kohat	Matric	2003	9/2/2004	GSDC Timargara
14	Hussain Ahmad	Shahir Ahmad	Chowkidar	2/4/1986	DI Khan	Matric-BA	1999 (A)	9/2/2004	GSDC Timargara
15	Muhammad Zahid	Ghulam Qasim	Sweeper	6/2/1984	Mardan	M.A	2003 (A)	23-2-2004	DO, SW Dir Lower
16	Riaz Ullah	Abdul Qadir	Naib Qasid	29-09-1977	DI Khan	Matric	2002	1/7/2004	Welfare Home Kohat
17	Sajjad Khan	Fateh Muhammad	Naib Qasid	2/4/1983	DI Khan	B.A	2001 (S)	2/9/2005	GIB DI Khan
18	Wahid Ur Rehman	Aziz Ur Rehman	Chowkidar	3/3/1978	Charsadda	Matric	1996	24-4-2006	DO SW, Mardan
19	Gulzar Ahmad	Fazal-e-Elahi	Chowkidar	3/1/1968	Peshawar	Matric		1/7/2006	RCDA DI Khan
20	Muzafar Khan	Hayat Khan	Sweeper	14-6-1970	Peshawar	B.A	2008(A)	1/7/2006	RCDA DI Khan
21	Noroz Khan	Inayat Khan	Sweeper	16-1-1973	Peshawar	Matric	1985 (S)	18-6-2007	DO Office Charsadda
22	Jan Gul	Sham-Ur- Rehman	Chowkidar	5/5/1977	Peshawar	B.A	1989	1/7/2007	WCC Peshawar
23	Zia Ullah	Saif-Ul-Wali	Mali	20-2-1980	Peshawar	B.A	1994 (A)	1/7/2007	WCC Peshawar
24	Akhtar Munir	M. Anwar	Chowkidar	2/1/1982	Peshawar	Matric	1996(S)	1/7/2007	Darul Kafala Peshawar
25	Zahid Ullah	Roiyat Khan	Cook	20-4-1985	Peshawar	Matric	1999(S)	1/7/2007	RCDA Peshawar
26	Zakir Ullah	Abdul Malik	Chowkidar	15-11-1976	Peshawar	Matric	2003	1/7/2007	Darul Kafal Peshawar
27	Khalid Khan	Sher Alam	Chowkidar	30-11-1986	Kohat	Matric	2003(A)	1/7/2007	G.I.B (Boys) Peshawar
28	Ahmer Nawaz	Shah Nawaz	Sweeper	15-12-1969	Mardan	Matric-FA	1996(S)	5/10/2007	Darul Kafala Peshawar
29	Qamar Ali Khan	Gul Nawaz Khan	Chowkidar	15-2-1978	Mardan	Matric	2004(A)	10/10/2007	G.I.B (Boys) Peshawar
			Naib Qasid	1/1/1972	Tank	Matric	1987 (A)	15-11-2007	DO SW Kohat
				12/6/1966	Bannu	M.A	1995 (S)	31-1-2008	DO, SW, Mardan
							1987 (A)	7/2/2008	Darul Aman Mardan
								30-6-2008	DO (SW) Tank
									W.F Bannu

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10/04/19

Milani
For Circulation
1/4/19



Annexure-
C No. 038354

Roll No 130328

**Board of Intermediate and Secondary Education
Peshawar
N.W.F.P Pakistan**

Secondary School Certificate Examination



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Advocate

**SESSION 2008- ANNUAL
(Arts Group)**

9

This is to Certify that Riaz Ullah Son of Abdul Qadir
and a resident of Charsadda District has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in April, 2008 as a Private
candidate. He obtained 484 Marks out of 900 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|--------------------|----------|---------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. General Science | 6. Maths | 7. Islamic Studies | 8. Pashto |

Date of birth according to admission form March 20, 1978

Asstt Secretary

District Officer
Social Welfare
Charsadda

Secretary

This certificate is issued without alteration or erasure.

10

MOST IMMEDIATE

A.C.R - 9/12/17

9/12/2017



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL EDUCATION AND
WOMEN EMPOWERMENT JAMRUD ROAD PESHAWAR.

091-9224253

No. E-17/56/DSW/Vol-04 7054-12

Dated Peshawar the 13/12/2017

To

District Officer Social Welfare,
D.I Khan, Dir Lower, Abbotabad, Mansehra,
Peshawar, Mardan, Charsadda, Kohat & Chitral.

ANNEX D

Subject: **COMPLETION/SUBMISSION OF PERs FOR LAST FIVE YEARS ALONG WITH WILLINGNESS/NON WILLINGNESS.**

I am directed to refer to the subject noted above and to request you to submit complete PERs (Reported & Countersigned) on prescribed form in duplicate for each year for the last five years (2013-2017) along with willingness / non willingness, of the following matriculate class-IV, employees working under your jurisdiction at the earliest, so as their promotion case is materialized in the shortest possible time.

Sr. #	Name	Designation	Place of Posting
1	Muhammad Ilyas	Work: Attend:	GIB DI Khan
2	Munir Ahmad	Chowkidar	DO SW DI Khan
3	Munjhir Mashi Bhatti	Sweeper	GIB DI Khan
4	Aziz Rehmat	Naib Qasid	DO, SW Chitral
5	Zahid Hussain	Chowkidar	DO, SW Mansehra
6	Zafar Alam	Chowkidar	Superintendent Darul Aman Abbotabad.
7	Zafar iqbal	Naib Qasid	GIB DI Khan
8	Khair Muhammad Khan		GSDC Timargara
9	Lal Mehmood	Naib Qasid	GSDC Timargara
10	Yar Kamin Khan	Chowkidar	DO, SW Dir Lower
11	Muhammad Aman	Naib Qasid	Welfare Home Kohat
12	Muhammad Sajid	Workshop Atten.	GIB DI Khan
13	Asghar Munir	Chowkidar	DO, SW, Mardan
14	Hussain Ahmad	Sweeper	RCDA DI Khan
15	Muhammad Zahid	Naib Qasid	RCDA DI Khan
16	Riaz Ullah	Naib Qasid	DO Office Charsadda
17	Sajjad Khan	Chowkidar	WCC Peshawar
18	Wahid Ur Rehman	Chowkidar	WCC Peshawar
19	Gulzar Ahmad	Sweeper	Darul Kafala Peshawar
20	Muzafar Khan	Sweeper	RCDA Peshawar

Assistant Director (Estab)

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Advocate

Copy forwarded to:

- 1- Superintendent Government Institute for the Blind, Dera Ismail Khan.
- 2- Rehabilitation Officer, Rehabilitation Centre for Drug Addicts, D.I Khan & Peshawar.
- 3- Manager Women Crises Center, Peshawar.
- 4- Manager Darul Kafala, Peshawar.
- 5- Superintendent Darul Amaan Abbotabad.
- 6- Principal, Government School for Deaf Children, Timargara, Dir Lower.

11

ANNEXURE E



Government of Khyber Pakhtunkhwa
OFFICE OF THE DISTRICT OFFICER
Social Welfare, Special Education and Women Empowerment Department,
Near Hashtnagar Floor Mill Thakhtbhai Road Charsadda

NO.DO/SW/CHD/ 7674

Dated/ 21.12.2017

To,

✓
The Director,
Social Welfare, Special Education and Women Empowerment Department,
Khyber Pakhtunkhwa Peshawar.

Subject:- COMPLETION/SUBMISSION PERS FOR LOST FIVE YEARS ALONG WITH WILLINGNESS/NO WILLINGNESS.

Reference to your office letter no. E-17/56/DSW/Vol-04/7054-62 dated 13-12-2017 on the subject noted above.

Kindly find enclosed herewith the ACRs of Mr. Riaz Ullah Naib Qasid office of the under signed for the year 2015, 2016 and 2017

It is further requested that the ACRs for the year 2013 and 2014 vide this office letter no. DO/SW/CHD/3996 dated 11-09-2014 and letter no. /SW/CHD/5750 dated 06-10-2015 have already been submitted to your office please.

ENCLOSURES:

1. ACRs for the year 2015, 2016 & 2017.
2. Willingness of the Official.

DISTRICT OFFICER
SOCIAL WELFARE DEPARTMENT
CHARSADDA

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(12)

ANNEXURE E

بند مات جناب ڈسٹرکٹ آفیسر سوشل ویلفیئر ڈیپارٹمنٹ چارسدہ

عنوان: آمدگی اور ضمانندی برائے ترقی از نائیب قاصد تاجونیر کلرک

جناب عالی!

بجوالہ ڈائریکٹوریٹ آف سوشل ویلفیئر سیشنل ایجوکیشن و خود مختاری خواتین پشاور، صوبہ خیبر پختونخواہ چیٹی نمبر
E-17/56/DSW/Vol-04/7054-62 Dated 13-12-2017 بتاریخ 19-12-2017 بعنوان بالا موصل ہو
چکا ہے۔ تاکہ سائل ریاض اللہ نائیب قاصد گورنمنٹ سروس رولز کے مطابق اپنی ترقی از نائیب قاصد تاجونیر کلرک پر ضمانت اور آمادہ ہے،
اور رولز ریگولیشن فالو کر کے محکمہ ہذا کے ترقی کے لیے کام کرے گا اور محکمہ کے ناعد و ضوابط کا پابند رہوں گا۔

تاریخ: 21-12-2017

ریاض اللہ نائیب قاصد دفتر ڈسٹرکٹ آف سوشل ویلفیئر ڈیپارٹمنٹ چارسدہ۔

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GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE, SPECIAL
EDUCATION AND WOMEN EMPOWERMENT
JAMRUD ROAD PESHAWAR.

12

Answer 9

Dated Peshawar the 30-07-2020

ORDER

No. E-17/56/Vol-III/DSW/ 862-73. On recommendations of the Departmental promotion Committee in its meeting held on 30-07-2020, the following officials are hereby promoted to the post as recorded against their names with immediate effect.

1- JUNIOR CLERK BPS-11 TO BE PROMOTED AS SENIOR CLERK (BPS-14)

S. No	Name of Official	Place of present posting
1	Mr. Akbar Aii	GIB, Mardan
2	Mr. Taqweem Ul Haq	DO (SW) Office Dir Lower
3	Mr. Muhammad Altaf	DO (SW) Office Mansehra
4	Mr. Hamayun Khan	MR & PHC Peshawar
5	Mr. Saïd Rashid	SDC Kohat

2- AUXILIARY WORKER (BPS-7) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Shakirullah	DO (SW) Office Peshawar
2	Mr. Mujeebullah	DO (SW) Office DIKhan
3	Mst. Atiyya Rasool	DO (SW) Office Peshawar
4	Mst. Asmat Begum	DO (SW) Office Mardan
5	Mr. Imranullah	DO (SW) Office Charsadda
6	Mst. Rehana Yasmin	DO (SW) Office DIKhan
7	Mr. Ifkhar Ahmad	DO (SW) Office Charsadda
8	Mr. Hidayatullah	DO (SW) Office Malakand
9	Mr. KifayatUllah	DO (SW) Office DIKhan
10	Mr. Akbar Nawaz	DO (SW) Office Peshawar
11	Mr. Mansoor Ahmad	DO (SW) Office Mardan
12	Mr. Asad Khan	DO (SW) Office Mardan
13	Mr. Faiz Muhammad	DO (SW) Office Mansehra
14	Mr. Shahzadi Neelofar	DO (SW) Office Peshawar
15	Mst. Yasmin Begum	DO (SW) Office Mardan
16	Mr. Javed Iqbal	DO (SW) Office Swat
17	Mr. Shah Zeb	DO (SW) Office Mardan

a- STORE KEEPERS (BPS-6-8) TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Abdul Qadir	DO (SW) Office Buner
2	Mr. Shamsul Arifeen	School for Deaf Children Gulbahar Peshawar
3	Mr. Sadiq Akbar	GIB, Swat
4	Mr. Nasrullah	GIB (Male) Peshawar
5	Mr. Nasrullah	GIB D.I.khan

b- CLASS-IV TO THE POST OF JUNIOR CLERK (BPS-11)

S. No	Name of Official	Place of present posting
1	Mr. Muhammad Sajid Workshop Attendant	GIB D.I.Khan
2	Mr. Hussain Ahmad Sweeper	RCDA D.I.Khan
3	Mr. Sajjad Khan Chowkidar	Women Crises Centre Peshawar
4	Mr. Noroz Khan Chowkidar	Darul Kafala Peshawar
5	Mr. Muhammad Aman Naib Qasid	Welfare Home Kohat
6	Mr. Umar Ali Khan Chowkidar	Welfare Home Bannu

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- 2- The officials on promotion will remain on probation for a period of one year extendable for a further period of one year in terms of Rules 6 (2) of the Khyber Pakhtunkhwa Civil Servant Act 1973 read with Rule 15 (1) of the Khyber Pakhtunkhwa Government Servant (Appointment, Promotion & Transfer) Rules 1989.
- 3- Consequent upon of their promotions, the officials are hereby posted upon the post as mentioned against their names below.

134

Posting of Senior Clerks (BPS-14)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Akbar Ali, Senior Clerk (BPS-14)	Directorate of Social Welfare
2	Mr. Taqweem Ul Haq Senior Clerk (BPS-14)	CDC Chakdara Dir Lower
3	Mr. Muhammad Altaf Senior Clerk (BPS-14)	GIB Abbottabad
4	Mr. Hamayun Khan Senior Clerk (BPS-14)	GIB D.I. Khan
5	Mr. Sajid Rashid Senior Clerk (BPS-14)	GSDC Kohat

Posting of Junior Clerks (BPS-11)

S. No	Name & Designation of Official	Place of Posting
1	Mr. Shakirullah, Junior Clerk (BPS-11)	District office SW Peshawar
2	Mr. Mujeebullah, Junior Clerk (BPS-11)	Deaf School Karak
3	Mst. Attiya Rasool, Junior Clerk (BPS-11)	District office SW Peshawar
4	Mst. Asmat Begum, Junior Clerk (BPS-11)	GSDC (F) Mardan
5	Mr. Imranullah, Junior Clerk (BPS-11)	Bacha Khan Vocational Center Charsadda
6	Mst. Rehana Yasmin, Junior Clerk (BPS-11)	District office SW D.I. Khan
7	Mr. Ifikhar Ahmad, Junior Clerk (BPS-11)	RCDA Charsadda
8	Mr. Hidayatullah, Junior Clerk (BPS-11)	RCDA Malakand
9	Mr. KifayatUllah, Junior Clerk (BPS-11)	RCDA D.I. Khan
10	Mr. Akbar Nawaz, Junior Clerk (BPS-11)	Directorate of Social Welfare
11	Mr. Mansoor Ahmad, Junior Clerk (BPS-11)	Bacha Khan Vocational Center Nowshera
12	Mr. Asad Khan, Junior Clerk (BPS-11)	District Office, SW Swabi
13	Mr. Faiz Muhammad, Junior Clerk (BPS-11)	District Office SW Torghar
14	Mst. Shahzadi Neelofar, Junior Clerk (BPS-11)	District office SW Charsadda
15	Mst. Yasmin Begum, Junior Clerk (BPS-11)	GSDC Swabi
16	Mr. Javed Iqbal, Junior Clerk (BPS-11)	District office SW Swat
17	Mr. Shah Zeb, Junior Clerk (BPS-11)	MR&PH Swabi
18	Mr. Abdul Qadir, Junior Clerk (BPS-11)	Welfare Home Buner
19	Mr. Shamsul Arifeen,	District Office SW Abbottabad

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21	Mr. Nasrullah, Junior Clerk (BPS-11)	GIB. (M) Peshawar
22	Mr. Nasrullah, Junior Clerk (BPS-11)	District office SW Chitral
23	Mr. Muhammad Sajid, Junior Clerk (BPS-11)	Bacha Khan Women Vocational Center Karak
24	Mr. Hussain Ahmad, Junior Clerk (BPS-11)	District Office SW D.I. Khan
25	Mr. Sajjad Khan, Junior Clerk (BPS-11)	Welfare Home Hangu
26	Mr. Noroz Khan, Junior Clerk (BPS-11)	SSMC Chakdara Dir (Lower)
27	Mr. Muhammad Aman, Junior Clerk (BPS-11)	GSDC Kohat
28	Mr. Umar Ali Khan, Junior Clerk (BPS-11)	District Office SW Lakki Marwat
29	Mr. Sajid Ali, Junior Clerk (BPS-11)	Directorate of Social Welfare
30	Mr. Naeem Kokar, Junior Clerk (BPS-11)	Welfare Home Buner

Sd—
Director
Social Welfare, Spl: Edu: & WE
Khyber Pakhtunkhwa

Copy to:

- 1- The Accountant General, Khyber Pakhtunkhwa
- 2- The Concerned District Account Officer in Khyber Pakhtunkhwa
- 3- PS to Minister for Social Welfare, Special Education & Women Empowerment, Department, Khyber Pakhtunkhwa
- 4- PS to Secretary, Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa
- 5- The Concerned District Officer, Social Welfare in Khyber Pakhtunkhwa
- 6- Deputy Director (MIS) Social Welfare Department, Khyber Pakhtunkhwa
- 7- The concerned Incharge of institute of Social Welfare in Khyber Pakhtunkhwa
- 8- PA to Director, Social Welfare, Special Education & Women Empowerment, Khyber Pakhtunkhwa
- 9- Assistant Director (E-1), Directorate of Social Welfare
- 10- All the official concerned
- 11- Personal file

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Deputy Director (Admin)
Social Welfare, SE & WE 30/7/22
Khyber Pakhtunkhwa

H

کفر جناب ڈسٹرکٹ آفیسر سوسائٹی ویلفر جا پندرہ

ملفوظان دد خواست بدلتی تر فر / پرو مویش

صباپ عالی

فود بلانہ گزاراں صباپ عالی کہ میں مجلہ سوسائٹی ویلفر ڈسٹرکٹ

جاریہ میں ثابت قاصد پوسٹ پر 18-6-1977 سے تمام کرایہ سوا

مجموع آج صباپ عالی سے لیا جاتا ہے اور کہ مجھ سے کوئی

کلکشن فور پرو مویش ہوتی ہے اور میں اسکی تک نہیں ہوں

میں بارگاہ پوسٹ کو لحاظ سے میں پرو مویش ان پورٹ سے

بیل دعویٰ جا ہے کہتی

آج صباپ عالی سے عاجز بلانہ گزاراں سے کہ میں کبھی پرو مویش

ان درخواستیوں کو آفسر ریسیل کرنے مشکل و فرمائش ہے

الحق

العارض

آدیا تا تعداد فرمان رضا اللہ نامی صاحب
ڈسٹرکٹ آفیسر سوسائٹی ویلفر جا پندرہ
(تاریخ) 16-3-77

Addl

Pat

16/3

Handwritten signature



(17)

**GOVERNMENT OF KHYBERPAKHTUNKHWA
OFFICE OF THE DISTRICT OFFICER**

Social Welfare Special Education and Women Empowerment Department
Takht Bhai Road Near Hashtnagar Floor Mill Charsadda

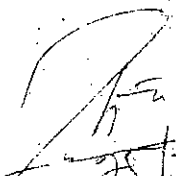
NO.DO/SW/CHD/4074/S
Dated 25.02.2024

To,

The Director,
WE, SE & WE Department Peshawar

Subject:- Application for promotion

Please find enclosed herewith a self explanatory application received from Mr Riaz Ullah Naib Qasid BPS-04, District Office Social Welfare Department Charsadda forwarded for further necessary action as per Rules please.


25/3/2024
DISTRICT OFFICER
SOCIAL WELFARE DEPARTMENT
CHARSADDA

Copy for information to:-

1. Mr Riaz Ullah Naib Qasid Social Welfare Department Charsadda.

DISTRICT OFFICER
SOCIAL WELFARE DEPARTMENT
CHARSADDA

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

Dated Peshawar, the 18th July, 2019

NOTIFICATION

No.SOE.IV(E&AD)/1-35/2014:-

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, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SOE.IV (E&AD)/1-35/2012 dated 6th December, 2012, the following amendments shall be made, namely:

AMENDMENTS

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Junior Clerk.	(i) FA/ F.Sc with second division or equivalent qualification from a recognized Board; and (ii) a speed of thirty (30) words per minute in typing.	18 to 30 years.	(a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed FA/F.Sc Examination or its equivalent qualification from a recognized Board; and (b) sixty per cent by initial recruitment. Note: For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification.

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ANNEXURE I

18

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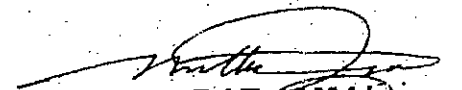
1.	2.	3.	4.	5.
			<p>TESTED To be true copy Advocate</p>	<p>Provided that-</p> <ul style="list-style-type: none">(i) if two or more officials have acquired the FA/F.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post;(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials: <p>Provided further that The condition of FA/F.Sc or its equivalent qualification from a recognized Board as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11)."</p>

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Endst: No. SOE-IV(E&AD)/1-35/2014, dated 18th July, 2019

Copy forwarded for information and necessary action to: -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Senior Member of Board of Revenue.
3. The Principal Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary, Khyber Pakhtunkhwa Public Service Commission.
7. Deputy Director (IT), Establishment & Administration Department with the request to upload on the official website.
8. PS to Chief Secretary Khyber Pakhtunkhwa.
9. PS to Secretary Establishment Department,
10. PS to Special Secretary (Estt), Establishment Department.
11. PS to Special Secretary (Reg), Establishment Department.
12. PA to Addl: Secretary (Est/ Reg), Establishment Department.
13. PA to Addl: Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar.
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette with the request to provide 50 copies of Gazette.


(HAZRAT JAMAL)
SECTION OFFICER (E-IV)

ATTACHED
TO ORIGINAL COPY
18/07/2019

20

(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

RIAZULLAH

VS

GOVT. OF KP& Others

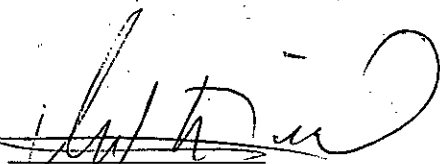
I, Riaz Ullah do hereby nominated and appointed **MUHAMMAD MAAZ MADNI**, Advocate, High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred in the above matter as and is agreed to sign and file petition, appeals, statements, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc and to apply for and issue summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceedings that may arise there out; and to apply for and receive payment of any or all sums or submit the above matter to arbitration, and to employ an other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the advocate whenever he may think fit to do so.

AND to do all acts legally necessary to manage and conduct the said case in all respects whether herein specified or not, as may be proper and expedient.

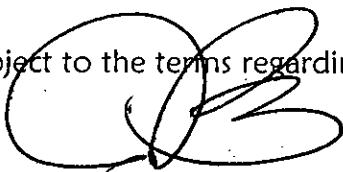
AND I/WE hereby agree to ratify and confirm all lawful acts done on my/our behalf; under or by virtue of these present or of the usual practice in such matter. PROVIDED always that I/WE undertake at the time of calling of the case by the court I/MY authorized agent shall inform the advocate and make him appear in the court, if the case, may be dismissed in default, it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHERE OF I/We hereunto set MY/OUR hand to these presents, the contests of which have been explained to and understood by ME/US this 05th day of July 2021.

EXECUTANT


(Riaz Ullah)

Accepted subject to the terms regarding fees:



MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
BC No. (BC-11-1460)
CNIC No. 17101-9263898-1

OFFICE: KHATTAK LAW ASSOCIATES, Juma Khan Plaza, Warsak Road, Peshawar.
Contact#: 0333-9313113, 0345-9090737

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Mr. Riaz Ullah----- (Appellant)

Versus

Government of Khyber Pakhtunkhwa

INDEX

S. No.	Detail of Documents	Page No.
1.	Affidavit	1
2.	Reply/comments	2-4
3.	Annex-I	5-7
4.	Annex-II	8-14

hmgk
DEPONENT
CNIC No.17101-0377128-9
Cell# 0346-9148582

①

BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR

Service Appeal No.6726 of 2021

Mr. Riaz Ullah..... (Appellant)

Versus

Government of Khyber Pakhtunkhwa

AFFIDAVIT

I Syed Nabi Gul, Superintendent (Lit), Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of the accompanying reply/comment are true and correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'ble Tribunal.

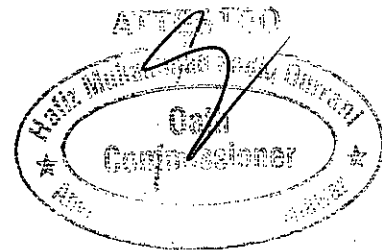
hmg

DEPONENT

CNIC No.17101-0377128-9

Cell# 03469148582

09 JUN 2022



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service appeal No. 6726/2021

Mr. Riaz Ullah s/o Abdul Qadir, Naib Qasid (BPS-04), District Office Social Welfare, Charsadda.....**APPELLANT**

VERSUS

1. The Secretary, Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa..
2. The Director, Directorate of Social Welfare, and Women Development Department Khyber Pakhtunkhwa.
3. The District Officer, Social Welfare Department, Charsadda.

Khyber Pakhtunkhwa Service Tribunal

220

Slary No. _____

Dated 9-6-2022

.....**RESPONDENTS**

PARA-WISE COMMENTS ON BEHALF OF THE RESPONDENTS.

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. The appellant has got no cause of action to file the present service appeal.
2. The appeal is not maintainable in its present form.
3. The appeal is based on malafide intentions.
4. The appellant has no locus standi.
5. The appeal in hand is badly time barred.
6. The appellant has not come to Honorable Tribunal with clean hands.
7. The appellant has concealed the material facts from this Honorable Tribunal, hence liable to be dismissed.
8. The appeal is liable to be dismissed for non joinder & misjoinder of necessary parties.
9. The appeal is against the prevailing laws & rules.

FACTS

1. Pertains to record.
2. Correct.
3. Correct to the extent that the appellant has improved his qualification by acquiring SSC from BISE Peshawar. However, since the upgradation of post of Junior Clerk from BPS-07 to BPS-11, Service rules of the respondents department were revised and only those class-IV employees were declared fit for promotion to the post of Junior Clerk (BPS-11), who availed a minimum of FAF.SC Qualification (Annex-I).
4. Pertains to record. However, since the upgradation of post of Junior Clerk from BPS-07 to BPS-11, Service rules of the respondents department were revised and only those class-IV employees were declared fit for promotion to

the post of Junior Clerk (BPS-11), who had availed a minimum of FAF.SC Qualification (**AnnexII**)

5. Correct with clarification that pursuant to the amendment in Service Rules vide Notification No. SO-II/SWD/II-12/Service Rules/2019 dated the 25th September 2019, Seniority Lists were amended on the basis of date of acquisition of the prescribed qualification i.e FAF.Sc. Since the Petitioner does not have the prescribed qualification hence the respondents only issued promotion orders to those employees who had the requisite qualification of FAF.SC as prescribed in the revised Service Rules.
6. As explained above that the appellant does not have the prescribed qualification to be promoted to the post of junior clerk BPS-11 that is the reason the Departmental Appeal was not considered by the respondents.
7. In light of the above facts it is requested to dismiss the appeal on the following grounds.

GROUND

- A) Incorrect, hence denied. As explained in the above paras that the appellant does not have the requisite qualification to be promoted to the post of Junior Clerk (BPS-11) that is the reason why the appellant was not promoted.
- B) Incorrect, hence denied. The factual position has been explained in above Paras.
- C) Incorrect, hence denied. As explained above, the appellant was not promoted to the post of Junior Clerk (BPS-11) as he does not have the prescribed qualification according to the set rules.
- D) Incorrect, hence denied. The factual position has been explained in above Paras.
- E) Incorrect, hence denied. The order dated 30-07-2020 has been issued in light of prevailing service rules and since the appellant does not possess the qualification of FA/FSC, hence he has not been promoted.
- F) Incorrect, hence denied. As explained above.
- G) Incorrect, hence denied. As explained above that the order dated 30-07-2020 has been issued in light of prevailing service rules and since the appellant does not possess the qualification of FA/FSC, as such, he has not been promoted.
- H) Incorrect, hence denied. The factual position has been explained in above Paras.
- I) The respondents seeking permission to advance other grounds and proofs at the time of hearing.

4

Keeping in view the above facts and grounds, it is requested to dismiss the instant service appeal being meritless.



SECRETARY to

Govt. of Khyber Pakhtunkhwa for
Ushr, Zakat
Social Welfare, Special Education &
Women Empowerment
(Respondent No. 1)



DIRECTOR

Social Welfare, Special Education &
Women Empowerment, Peshawar
(Respondent No. 2)



District Officer

Social Welfare, Charsadda
(Respondent No. 3)



Government of Khyber Pakhtunkhwa
Directorate of Social Welfare, Special Education and
Women Empowerment Jamrud Road Peshawar.

Dated Peshawar this 08/07/2020

091-9224253

ORDER

No. E-17/56/DSWN/CI-II 20-21 In pursuance of section 8 (1) of Khyber Pakhtunkhwa Civil Servants Act 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants Appointment, Promotion & Transfer) Rules 1989, final Seniority List of Class-IV Employees BPS(3-5) of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa who have attain the Intermediate Certificate from recognized Board, as stood on 31-03-2020 is hereby notified for the information of all concerned.

S.#	Name of official	F- Name	Designation	Date of birth	Domicile	Qualification	Year of Passing Matriculate Examination	Date of 1 st Entry into Govt Service:	Name of Office	Remarks
1	Muhammad Sajid	Ghulam Saddiq	Workshop Atten.	2/4/1986	Di Khan	M.A	2002	2/9/2005	GiB Di Khan	FSc (2005)
2	Hussain Ahmad	Shabir Ahmad	Sweeper	29-09-1977	Di Khan	B.A	1996	1/7/2006	RCDA Di Khan	FA(2006)
3	Sajjad Khan	Fateh Muhammad	Chowkidar	3/1/1968	Peshawar	B.A	1985 (S)	1/7/2007	WCC Peshawar	FA (1990)
4	Noroz Khan	Inayat Khan	Chowkidar	20-2-1980	Peshawar	B.A	1999(S)	1/7/2007	Darul Kafal Peshawar	FA (2003)
5	Muhammad Aman	Awal Khan	Naib Qasid	1/10/1984	Kohat	Matric-BA	2003 (A)	1/7/2004	Welfare Home Kohat	FA (2008)
6	Umar Ali Khan	Ghazi Marjan	Chowkidar	20-7-1970	Bannu	Matric-FA	1989	30-6-2008	W.H Bannu	FA(1989)
7	Muhammad Nabi	Muhammad Siraj	Naib Qasid	3/1/1981	Malakand	MA	1999 (A)	1/7/2008	GSDC Malakand	FA(2001)
8	Sajid Ali	Akhtar Gul	Naib Qasid	20-5-1986	Peshawar	F.A	2002(A)	1/7/2008	DSW	FA(2005)
9	Naeem Khokhar	Bona Masih	Sweeper	15-4-1987	Peshawar	F.A	2005 (A)	2/10/2009	G.I.B (Boys) Peshawar	FA (2008)
10	Asim Khan	Hamayoon Khan	Chowkidar	1/2/1989	Abbottabad	FA	2005(A)	21-10-2009	DO,SW, Abbottabad	FA(2007)
11	Abdul Mateen	Abdul Hamid	Naib Qasid	30-05-1973	Di Khan	M.A	1989	1/7/2008	W.H Di Khan	FA(2010)
12	Hamayun Khan	Akbar Nawaz Khan	Chowkidar	13-01-1975	Bannu	Matric D.Com	1992 (S)	13-3-2010	DO,SW, Bannu	DC didn't provide passing session of D Com
13	Adil Khan	Raees Khan	M. Sweeper	5/1/1990	Peshawar	B.A	2007 (A)	26-08-2010	ALW	FA(2009)
14	Noor Badshah	Lal Badshah	Naib Qasid	10/4/1982	Dir Lower	Matric.BA	1998 (S)	24-10-2010	DO,SW Dir Lower	FA(2007)
15	Abd Ullah	Roie Zameen Khan	Chowkidar	3/6/1989	Dir Lower	Matric.FA	2006 (A)	24-10-2010	DO,SW Dir Lower	FA(2008)
16	Ahmer Nawaz	Shah Nawaz	Chowkidar	1/1/1972	Tank	M.A		7/2/2008	DO (SW) Tank	FA(2011)
17	Gabril	Amir Hatim Jan	Cook	16-2-1970	Swat	F Sc	1997 (A)	1/7/2011	Darul kafaia Swat	FA(1990)
18	Qadar Khan	Abdul Wadood	Chowkidar	1/5/1974	Swat	Matric. FA	1990 (A)	1/7/2011	Darul kafaia Swat	FA(1992)
19	Noor Ullah	Abdul Rab	Chowkidar	12/3/1988	Charsarida	FA	2003 (S)	1/7/2011	W H Nowshera	FA(2006)
20	Syed Mubashir Habib	Syed Habib Shah	Chowkidar	1/2/1992	Peshawar	F.A	2014(A)	18-11-2011	DO Peshawar	FA (2011)
21	Irfikhar Ali	Sher Bahadur	Chowkidar	5/3/1984	Mardan	B.A	2003 (A)	28-12-2011	Darul Kafala Mardan	FA(2006)
22	Muzafar Khan	Hayat Khan	Sweeper	5/5/1977	Peshawar	B.A	1998(S)	1/7/2007	RCDA Peshawar	FA: 2005
23	Zakir Ullah	Ghulam Muhammad	Chowkidar	10/2/1988	Mardan	B.A	2006 (A)	28-12-2011	Darul Kafala Mardan	FA(2008)
24	Sadiq Nawaz	Sher Nawaz	Chowkidar	14-3-1989	Lakr Marwat	F.A	2006 (A)	28-12-2011	DO SW, Lakr Marwat	FA (2008)

6

1	Abul Khan	Shahid Ali Khan	Naib Qasid	26-3-1991		FA	2007 (A)	1/7/2012	DO Shangia	FA(2009)
2	Abul Saood	Abdul Hassan	Conductor	01.05.1989		FA	1995 (A)	9/7/2011	MR & PH Nowhsera	FA (2005)
3	Abul Bibi	Ameer Khan	Naib Qasid	24-1-1986	Mardan	F.A	2012 (A)	31-10-2012	DO, SW, Mardan	FA(2012)
4	Abul Ullah	Jehangir Khan	Chowkidar	2/1/1981	Charsaddha	F.A	1997(A)	1/11/2012	W.H Charsaddha	FA(2012)
5	Akhtar Munir	Hussain Ahmad	Naib Qasid	24-7-1988	Charsaddha	B.A	2005(A)	1/11/2012	W.H Charsaddha	FA(2005)
6	Sikandar Khan	Fazle Qadir	Mali	13-3-1982	Peshawar	F.A	2000 (A)	4/6/2010	GSDC Gulbahar Peshawar	FA (2013)
7	Muhammad Sohail	Asmat ullah	Chowkidar	5/4/1992	Malakand	F A	2010 (A)	28-1-2012	DO, Malakand	FA(2013)
8	Bilal	Wahid Gul	Chowkidar	15-4-1993	Dir Lower	FA	2010	12/12/2012	W.H Dir Lower	FA(2013)
9	Irfan Jamil	Jamil Ahmad	Naib Qasid	12/12/1983	Kohat	B.A	1999(A)	14-12-2012	DO, SW Kohat	FA(2005)
10	Khurshid Ali	Bakht Jehan	Naib Qasid	1/1/1978	Swat	F.A, JDPE	2012 (SSC)	29-08-1996	GIB Swat	FA(2014)
11	Abdullah Jan	Sher Muhammad	Chowkidar	11/2/1992	Charsadda	F.A	2008(A)	9/5/2011	D.O SW Charsaddha	FA(2014)
12	Abdullah Ahmad	Sahib Zada	Sweeper	25-3-1986	Swat	F.A	2003 (A)	1/7/2011	Darul Kafala Swat	FA(2014)
13	Waheed Ahmad	Naseer Ahmad	Chowkidar	24-9-1988	Peshawar	FA	2010	5/5/2014	DO SW Peshawar	FA (2013)
14	Bus Bibi	Juma Gul	AYA	3/3/1979	Peshawar	B.A, B.Ed	1996(A)	25-5-2014	MR&PHC Peshawar	FA (2000)
15	Noor Niaz Khan	Mir Haikm Khan	Chowkidar	3/9/1994	Bannu	FA	2013	28/05/2014	DO(SW)Bannu	FA(2013)
16	M.Hilal Khan	Haji Ayub Khan	Naib Qasid	23-3-1994	Peshawar	M.A	2009 (A)	3/6/2014	DSW	FA(2011)
17	Muhammad Zahid	Raiyat Khan	Chowkidar	20/2/1985	Kohat	Matric(2008)+ Shadatul alamiah		13/06/2014	GSDC Kohat	Shadatul Alamiah (2006)
18	Zahid Ullah	Roiyat Khan	Chowkidar	30-11-1986	Kohat	Matric-FA	2004(A)	10/10/2007	DO SW Kohat	FA(2015)
19	Zai Gul	Akber	Naib Qasid/Aya	1/1/1989	Buner	FA	2013	18/04/2011	DO(SW) Buner	FA(2015)
20	Ali Shah	Hazrat Usman Shah	Assistant Cook	6/3/1990	Swat	Matric, FA	2013 (A)	1/7/2011	Darul Kafala Swat	FA(2015)
21	Muhammad Umer		Chowkidar		Kohat	FA		14/06/2014	DO(SW)Kohat	FA(2015)
22	Faisal Jawad	Abdul Nabi	Chowkidar	10/3/1985	Charsadda	B.A	2001	20-07-2016	GIB Mardan	FA(2003)
23	Sharifa Zarin	Huzoor Khan	AYA	15-03-1989	Chitral	F.A	2006	27-07-2016	MRPH Chitral	FA(2008)
24	Qadir Khan	Rahim Khan	Chowkidar	8/4/1991	Mardan	FA		25/10/2016	Mardan	FA(2016)
25	Ziaullah	Saiful Wali	Chowkidar	20/4/1985	Peshawar	FA		2005	Darul Kafala Peshawar	FA (2017)
26	Saddam Hussain	Ihsan Ullah	Chowkidar	13-05-1996	Peshawar	D.Com	2013	10/5/2017	Darul Kafala Peshawar	FA (2015)
27	Mr. Fazal Akber	Abdul Manan	Naib Qasid	3/4/1989	Dir Lower	FA		11/5/2017	Dir Lower	FA(2010)
28	Muhammad Saeed	Fazle Kareem	Naib Qasid	8/2/1986	Mardan	FA		7/7/2017	Mardan	FA(2005)
29	Bilal Ahmed	Inyatullah	Sweeper	3/3/1998	Dir Lower	FA		17/07/2017	Dir Lower	FA(2016)
30	Suleman Khan	Naseer Khan	Naib Qasid	3/5/1997	Dir Lower	FA		11/5/2017	Dir Lower	FA(2018)
31	Noor Muhammad	Muhammad Suleman	Sweeper	26/2/1998	Kohat	FA		17/07/2017	Kohat	FA 2018
32	Shah Khalid	Aman ud Din	Naib Qasid	10-04-1984	Charsadda	B.A	2001(A)	05-03-2018	GSDC Charsadda	FA(2003)
33	Muhammad Nawaz Khan	Rab Nawaz Khan	Chowkidar	22-05-1976	Mardan	MA	15-06-1998	15-06-1998	SEC Mardan	FA (1995) Darul Kafala

73

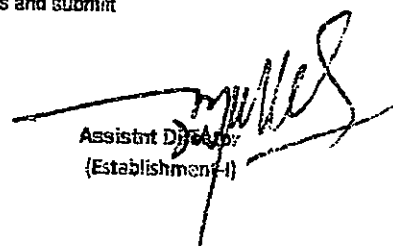
	Muhammad Iqbal Khan	Attendant	1/3/1989	Mardan	FA	8/3/2012	16-01-2010 as Attendant (Absorbed 12/01/2015)	Hostel Mardan	
8									
9	Ijaz Muhammad	Wali Muhammad							FA(2005)
0	Muhammad Sabir Khan	Akbar Khan	29/10/1973	Swabi	FA				
1	Mehreen	Obaid	02-10-1999	Swat	F.A	2015	1/12/1991	DO(SW) Swabi	FA(2018)
2	Ihsan Khan	Umar Rehman	1/1/1988	Mardan	FA		25-08-2018	D.O SW Swat	FA(2018)
3	Fouzia Naz	W/O Jamshed Khan	15-05-1996	Swat	F.A	2013	6/9/2019	Mardan	FA(2007)
4	Zakir Khan	Amin Khan	01-01-1983	Mardan		2000	01-10-2018	D.O SW Swat	FA(2014)
5	Sabir Khan	Akber Khan	5/4/1988	Swabi	M.A		07-09-2018	DO SW Mardan	FA(2005)
6	Saddam	Rahman Gul	2/10/1999	Swat	FA		24/9/2018	DO(SW) Swabi	FSc(2007)
7	Faisal Saleh Hayat	Sardar Ali	25/3/2000	Swabi	FA		24/9/2018	DO (SW)Swat	Fsc 2018
8	Irfan Ahmad	Muhammad Qayum	22-02-1988	Peshawar	B.A	2004	25/9/2018	DO(SW) Swabi	FSc(2018)
9	Majid Mehmood	Ghulam Mustafa	19-11-1999	Peshawar	F.Sc	F.A	28-09-2018	MR & PH Peshawar	FA(2006)
0	Junaid Khan	Gul Manan	19-01-1991	Haripur	M.A	2010	01-10-2018	GIB (G), Peshawar	FA (2018)
1	Saiman Khan	Umar Daraz Khan	20-09-1994	Bannu	M.A	2011	10-10-2018	DO SW Haripur	FA(2012)
2	Umar Muhammad	Nazar Muhammad	01-08-1995	Bannu	F.A	2014	10-10-2018	D.O SW Bannu	FA(2018)
3	Pir Musharaf Shah	Pir Maqbool Shah	20-02-1997	Swabi	M.A	2013	10-10-2018	MR & PH Bannu	FA(2018)
4	Qamar Zaman	Gulshan	11/2/1985	Mardan	FA		10-10-2018	GSDC Swabi	FA(2018)
5	Abid Ali	Muhammad Anwer	1/5/1994	Peshawar	BA	2010	7/2/2018	Mardan	FA(2019)
6	Waqas	Habib Ur Rehman	8/3/1983	Mansehra	FA+CT	2003	1/8/2019	SSEC Peshawar	FA(2014)
7	Muhammad Anees	Muhammad Nazir	12/1/1988	Mansehra	BA+DIT	2005	15/01/2009	MR&PH Mansehra	
			25/01/1990	Mansehra	Matric	2005	29/05/2014	MR&PH Mansehra	
							15/01/2009	MR&PH Mansehra	

Copy forward to:

- 1- The Section Officer-General, SW,SE&WE, Khyber Pakhtunkhwa.
- 2- The Assistant Director (Admin) Directorate of SW, SE&WE Khyber Pakhtunkhwa.
- 3- Manager Artificial Limbs Workshop KTH Peshawar.
- 4- All District Officer, Social Welfare Khyber Pakhtunkhwa

Sd/- Director (SW,SE&WE)

The officers at S.No. 2,3 & 4 above are requested to circulate the above Tentative seniority list amongst the incumbents and submit any objection / correction / addition within 15 days of the receipt of this letter


 Assistant Director
 (Establishment-I)

8.

Annex UP

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
SOCIAL WELFARE, SPECIAL EDUCATION AND WOMEN EMPOWERMENT DEPARTMENT

NOTIFICATION

Peshawar, dated the September, 25th 2019

No: SOII/SWD/II-12/Service Rules/2019-20: 320-52 In pursuance to 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 Notifications issued in this behalf, the Social Welfare Education and Women Empowerment Department Khyber Pakhtunkhwa, in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to this Notification, which is applicable to all the posts in the strength of Directorate of Social Welfare, Special Education and Women Empowerment Khyber Pakhtunkhwa (Welfare Side) specified in column 2 of the said Appendix:

APPENDIX

S.No:	Nomenclature	Minimum qualification for initial recruitment	Age Limit	Method of Recruitment
1	2	3	4	5
1	Director (BPS-19) ✓	---	---	By transfer of PCS/PMS/PAS Officer of the F Government.
2	Deputy Director (BPS-18) ✓	---	---	By promotion, on the basis of seniority-cum-fitness amongst the Social Welfare Officers, Managers, Rehabilitation Officers and Assistant Directors with at least five year as such. Note: A joint seniority list of Social Welfare Managers, Rehabilitation Officers and Assistant Directors be maintained for the purpose of promotion.
3	Assistant Director (BPS-17) ✓	At least Second Class Master's Degree or equivalent qualification from a recognized University.	21-35 years	(a) Thirty per cent (30 %) by promotion, on the seniority-cum-fitness, from amongst the Superintending Officers with at least three years service as such a qualification of graduation from a recognized University and (b) Seventy per cent (70 %) by Initial recruitment.

AD E II
AD B I

D. Prepare a case for publication in Govt gazette.

Director
Date: 30/9
45623
Date: 30-09-2019

17/80 D

Section 7-3 of 2019

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4	Manager (BPS-17)	At least Second Class Master's Degree in Social Work, Sociology, Anthropology or equivalent qualification from a recognized University.	21-35 years	(a) Ten per cent (10 %) by promotion, on basis of seniority-cum-fitness, from amongst the Administrative Officers with at least three years services as such; and (b) ninety per cent (90 %) by initial recruitment.
5	Rehabilitation Officer (BPS-17)	At least Second Class Master's Degree in Social Work, Sociology, Psychology, Anthropology or equivalent qualification from a recognized University.	21-35 years	By initial recruitment.
6	District Officer Social Welfare (BPS-17)	---	---	By transfer from amongst the officers in BPS-17 of Directorate of Social Welfare, Khyber Pakhtunkhwa, on social welfare side.
7	Social Welfare Officer (BPS-17)	At least Second Class Master's Degree in Social Work, Sociology, Anthropology or equivalent qualification from a recognized University.	21-35 years	(a) Ten per cent (10 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Field Officers with at least five years service as such; and (b) ninety (90) % by initial recruitment.
8	Medical Officer (BPS-17)	---	---	By transfer from Health Department on deputation basis.
9	Psychologist (BPS-17)	---	---	By transfer from Health Department on deputation basis.
10	Superintendent (BPS-17)	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographers with at least five years service as such. Note: A joint seniority list of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion.
11	Administrative Officer (BPS-17)	At least Second Class Master's Degree or equivalent qualification from a recognized University.	21-35 years	By initial recruitment.
12	Field Officer (BPS-16)	At least Second Class Master's Degree in Social Work, Sociology or Anthropology or equivalent qualification from a recognized University.	21-35 years	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Vocational Teachers with at least three years service as such.

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13	Senior Scale Stenographer (BPS-16)	---	---	By promotion, on the basis of seniority-cum-fitness amongst the Junior Scale Stenographers with at least service as such.
14	Assistant (BPS-16)	At least Second Class Bachelor's Degree or equivalent qualification from a recognized University.	20-32 years	(a) Forty per cent (40 %) by promotion, on the seniority-cum fitness, from amongst the Inst Trades with at least five years service as such. (b) thirty five percent (35 %) by promotion, on the seniority-cum-fitness, from amongst the Sen and Accountants with at least five years service and (c) twenty five per cent (25 %) by initial recruitment
15	Computer Operator (BPS-16)	(i) At least Second Class Bachelor's Degree in Computer Science, Information Technology (BIT/BCS four years) or equivalent qualification from a recognized University; or (ii) at least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from the Board of Technical Education.	21-35 years	By initial recruitment.
16	I.T Teacher Female (BPS-16)	At least Second Class Bachelor's Degree in Computer Science, Information Technology (BIT/BCS four years) or equivalent qualification from a recognized University.	21-35 years	By initial recruitment.
17	Hostel Warden (BPS-15)	---	---	By promotion, on the basis of seniority-cum-fitness, amongst the Assistant Hostel Wardens having at least service as such.
18	Instructor all Trades (BPS-14)	---	---	By promotion, on the basis of seniority-cum-fitness amongst the Instructors (Electrical), Instructors (Tailors), Instructors (Carpenter) with at least five years service Note: A joint seniority list of Instructors (Electrical), Instructors (Tailors) and Instructors (Carpenter) maintained for the purpose of promotion.

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19	Junior Scale Stenographer (BPS-14)	(i) At least Second Division Intermediate Certificate or equivalent qualification from a recognized Board; (ii) Fifty (50) words per minutes in English Short Hand and thirty (35) words per minutes in typing; and (iii) knowledge of Computer in using MS Word and MS-Excel.	18-30 years	By initial recruitment.
20	Senior Clerk (BPS-14)	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks with at least two years service :
21	Senior Vocational Teacher (BPS-12)	At least Second Division Secondary School Certificate from a recognized Board along-with three years Diploma in Women Vocational from the Board of Technical Education.	18-32 years	(a) Forty per cent (40 %) by promotion, on the seniority-cum-fitness, from amongst the New Instructors with at least five years services as s (b) five per cent (05 %) by promotion, on the seniority-cum-fitness, from amongst the Vocational Teachers with at least five years such; (c) five per cent (05 %) by promotion, on the seniority-cum-fitness, from amongst the Instructors with at least three years services as : (d) fifty per cent (50 %) by initial recruitment.
22	Assistant Hostel Warden (BPS-12)	---	---	By promotion, on the basis of seniority-cum-fitness amongst the Junior Hostel Warden having three years such.
23	Pharmacy Technician (BPS-12)	---	---	By transfer from Health Department on deputation basis
24	Orthotic and Prosthetic Technician (BPS-12)	---	---	By transfer from Health Department on deputation basis
25	Lady Health Visitor (BPS-12)	---	---	By transfer from Health Department on deputation basis

26	Junior Clerk (BPS-11)	<p>(i) FA / FSc with second division or equivalent qualification from a recognized board; and</p> <p>(ii) A speed of thirty (30) words per minute in typing</p>	18-32 years	<p>(a) Thirty per cent (30 %) by promotion, on the seniority-cum-fitness, from amongst the Daftaris, Qasids, Chowkidars, Sweepers, Malis, Security Cooks and Attendants with two years service who have passed FA / FSc Examination recognized Board;</p> <p>(b) thirty per cent (30 %) by promotion, on the seniority-cum-fitness, from amongst the Workers having at least three years service as such;</p> <p>(c) ten per cent (10 %) by promotion, on the seniority-cum-fitness, from amongst the Store having at least three years service as such; and</p> <p>(d) thirty per cent (30 %) by initial recruitment.</p> <p>Note: A joint seniority list of Daftaris, Naib Chowkidars, Sweepers, Malis, Security Guards, Cooks and Attendants shall be maintained for the purpose of promotion.</p>
27	Instructor (Electrical) (BPS-11)	At least Second Division Intermediate Certificate from a recognized Board with one year Diploma in Electrical Technology from the Board of Technical Education or Secondary School Certificate from recognized Board with three years Diploma in Electrical Technology.	18-28 years	By initial recruitment.
28	Instructor (Tailoring) (BPS-11)	At least Second Division Intermediate Certificate from a recognized Board with at least one year diploma in vocational skills from the Board of Technical Education with three years experience as Tailor.	18-28 years	By initial recruitment.
29	Instructor (Carpenter) (BPS-11)	At least Second Division Intermediate Certificate from a recognized Board with one year diploma in relevant field from the Board of Technical Education with three years experience as Carpenter.	18-28 years	By initial recruitment.

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30	Beautician Instructor (Female) (BPS-11)	At least Second Division Intermediate Certificate from a recognized Board along-with two years Beautician Diploma from the Board of Technical Education.	18-28 years	By initial recruitment.
31	Welfare Teacher (BPS-10)	At least Second Division Intermediate Certificate from a recognized Board.	18-30 years	By initial recruitment.
32	Junior Vocational Teacher (BPS-10)	At least Second Division Secondary School Certificate from a recognized Board along-with three years Diploma in Women Vocational from the Board of Technical Education.	18-28 years	By initial recruitment.
33	Junior Hostel Warden (BPS-10)	At least Second Division Intermediate Certificate from a recognized Board having two years experience in the relevant field.	18-32 years	By initial recruitment.
34	Needle Craft Instructor (BPS-09)	At least Second Division Secondary School Certificate from a recognized Board with two years Certificate (G-2) in Vocational skills from the Board of Technical Education.	18-32 years	By initial recruitment.
35	Auxiliary Worker (BPS-07)	At least Second Division Secondary School Certificate or equivalent qualification from a recognized Board.	18-32 years	By initial recruitment.
36	Nurse Attendant (BPS-07)	At least Second Division Secondary School Certificate from a recognized Board.	18-28 years	By initial recruitment.
37	Store Keeper (BPS-07)	At least Second Division Secondary School Certificate from recognized Board with one year experience in the relevant field.	18-32 years	By initial recruitment.
38	Driver (BPS-06)	Holding LTV/HTV Driving License and preferably literate.	18-40 years	By initial recruitment.
39	Daftari (BPS-04)	---	---	By promotion, on the basis of seniority cum fit amongst the holder of the post of matriculate Naib Q at least three years service.

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40	Naib Qasid (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.
41	Sweeper (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.
42	Chowkidar (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.
43	Mali (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.
44	Security Guard (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.
45	Cook (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.
46	Attendant (BPS-03)	Preferably literate.	18-40 years	By initial recruitment.

—Sd—

Secretary to Government of Khyber Pakhtunkhwa
Social Welfare, Special Education &
Women Empowerment Department

Endst: of Even No & Date:

Copy forwarded for information and further necessary action to the:

1. Secretary to Government of Khyber Pakhtunkhwa, Establishment & Administration, Finance and Law Departments.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. Director Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa.
5. Manager Government Printing Press Khyber Pakhtunkhwa, Peshawar for publication in the office gazette.
6. All District Account Officer Khyber Pakhtunkhwa.
7. PS to Governor Khyber Pakhtunkhwa Peshawar.
8. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar.
9. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
10. PS to Secretary Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa Peshawar.


Section Officer-II

لعدالت جناب حیرت علی صاحب سروس ٹریبیونل لٹریچر

درخواست لکھ کر دیکھیں تاریخ پیش

جناب عالی! گزارش حسب ذیل ہے

1۔ یہ کہ مقدمہ عدالت کے درمیان زیر طویل ہے جس میں تاریخ پیش آج فور ہے

2۔ یہ کہ من مسائل کا وکیل حسب سورت در القضاء میں پیش کیے سورت گیا ہے۔ اور یہ وہم آج تاریخ پیش پر حاضر عدالت نہیں ہو سکتا۔

3۔ یہ کہ وکیل حسب مذکورہ آئندہ تاریخ پیش پر حاضر عدالت ہو جائے گا۔

لہذا استدعا ہے کہ آج کی تاریخ تبدیل کر کے حاکم عدالت فرمایا جائے

تقریر: 12/6/22

محمد علی

دیا حق اللہ وللا علیہ العا در سکتہ شیخ آباد لٹریچر

چارندہ

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